

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
<b>Section 4.1 - Aesthetics</b>			
<p><b>Threshold 4.1-1</b> Would the Project substantially degrade the existing visual character or quality of the site and its surroundings?</p>	<p>The proposed development would be an improvement over the existing visual character and quality of the Project site. Construction activities, including infrastructure improvements, would be short term in nature and have less than significant impacts as these activities will not substantially degrade the existing visual character or quality of the Project site or its surroundings. Proposed development under the Development Plan would change the visual quality of the Project site, but compliance with the design guidelines and development standards in the Development Plan would prevent the substantial degradation of the visual character and quality of the Project site and the surrounding areas. Impacts on visual quality pursuant to Threshold 4.1-1 would be less than significant and no mitigation is required.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>
<p><b>Threshold 4.1-2</b> Would the Project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?</p>	<p>Proposed development would introduce new sources of light and glare that would increase lighting levels on the Project site. Distance from light-sensitive uses provided by streets and setbacks, existing developments and trees, and compliance with the design guidelines, development standards, and development requirements on lighting, as contained in the Development Plan, would prevent substantial light and glare spillover and change in the lighting levels that would have a significant and adverse effect on views in the area. Though no substantial spill-over lighting on adjacent development areas within the Project site are anticipated, DR AES-1 and DR AES-2 are provided regarding disclosure of potential spill over lighting. Pursuant to Threshold 4.1-2, impacts related to new sources of light and glare would be less than significant and no mitigation is required.</p>	<p><b>DR AES-1</b> Prior to issuance of any building permit, the County or its designee shall demonstrate that exterior lighting has been designed to be diffused, shielded, and low intensity and located so that direct rays are confined to the Project site in a manner meeting the approval of the Manager of Building &amp; Safety, or designee. For the development in and adjacent to the Mixed-Use District, a disclosure to the developers and end users of the potential for spill over lighting shall be incorporated into all lease agreements.</p> <p><b>DR AES-2</b> Prior to the approval of final inspection, the County or its designee shall provide a letter from the electrical engineer, licensed landscape architect, or licensed professional designer that a field test has been performed after dark and the light rays are consistent with the Development Plan. Specifically, the County or its designee shall submit a photometric study that demonstrates that lighting levels will not increase over 1-foot-candle over ambient conditions at the Project property line, excluding the Second Harvest Food Bank warehouse. The letter shall be submitted to the Manager of Inspection for review and approval. (Note: High voltage lighting requires a licensed electrical engineer stamp.)</p>	<p>Less Than Significant</p>

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
<b>Section 4.2 - Air Quality</b>			
<p><b>Threshold 4.2-1</b> Conflict with or obstruct implementation of the applicable air quality plan.</p>	<p>The proposed Project and the associated long-term emissions are not included in current regional air quality plans. Therefore, the Project conflicts with the current SCAQMD AQMP, which is a significant impact. Mitigation measure MM LU-1 would allow for the anticipated growth to be included in future long-range planning documents, which would eliminate the conflict. However, incorporation of the updated growth projections into the AQMP is not within the County's control. Therefore, the impact would be significant and unavoidable, pursuant to Threshold 4.2-1. Approval of the Project and commencement of construction would not obstruct implementation of the AQMP because the gradual completion of the Project and increase in operational emissions would be paralleled by AQMP revisions that would include the Project.</p>	<p>Refer to <b>MM LU-1</b> in Section 4.9, Land Use and Planning, below.</p>	<p>Significant and Unavoidable</p>
<p><b>Threshold 4.2-2</b> Violate any air quality standard or contribute substantially to an existing or projected air quality violation.</p>	<p>Pursuant to Threshold 4.2-2, construction mass (regional) emissions and local construction emissions would exceed SCAQMD CEQA significance thresholds. The unmitigated emissions include the implementation of DR AQ-1 through DR AQ-4. Implementation of MM AQ-1 would reduce the impacts to less than significant. Operational mass (regional) emissions of VOC, NOX, CO, PM10, and PM2.5 would exceed the SCAQMD CEQA significance thresholds, primarily due to mobile sources (i.e., vehicle travel). Implementation of DR AQ-6 would avoid emissions from indoor residential fireplaces. Mitigation measures MM AQ-2 through MM AQ-6 would reduce vehicle travel, but the impact would still be significant and unavoidable. It would be speculative to attribute specific numerical increases in adverse health impacts to the Project's exceedances of the SCAQMD significance thresholds. Local CO emissions would not have the potential to exceed applicable standards and would be less than significant.</p>	<p><b>DR AQ-1</b> During construction of the Project, the County or its designee shall comply with South Coast Air Quality Management District (SCAQMD) Rules 402 and 403, in order to minimize short-term emissions of dust and particulates. SCAQMD Rule 402 requires that air pollutant emissions not be a nuisance off site. SCAQMD Rule 403 requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. This requirement shall be included as notes on the contractor specifications. Tables 1 through 3 of Rule 403 prescribes the Best Available Control Measures that are applicable to all large operation construction projects and are included in Appendix C of the EIR for this Project. The County or its designee shall provide the Manager of Building &amp; Safety, or designee, with an SCAQMD-approved Dust Control Plan or other sufficient proof of compliance with Rule 403, prior to issuance of a grading permit.</p> <p><b>DR AQ-2</b> Architectural coatings shall be selected so that the volatile organic compound (VOC) content of the coatings is compliant with SCAQMD Rule 1113. This requirement shall be included as notes on the contractor specifications. The specifications for each project within the Development Plan area shall be reviewed by the Manager of Building &amp; Safety, or designee, for compliance with this requirement prior to issuance of a building permit.</p> <p><b>DR AQ-3</b> Prior to issuance of each grading and building permit, the County or its designee shall provide plans and specifications demonstrating that construction documents require the construction contractors to implement the measure listed below. The contractor shall comply with the identified requirements, and verification that the contractor has complied shall be confirmed by the Manager of Building &amp; Safety, or designee, during construction.</p> <p>All off-road diesel-powered construction equipment greater than 50 horsepower (hp) shall meet Tier 4 off-road emissions standards. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB). Any emissions-control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 4 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.</p>	<p>Significant and Unavoidable (Mass Operational Emissions)  Less Than Significant (Local CO Emissions)</p>

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
		<p><b>DR AQ-4</b> Prior to issuance of each grading and building permit, the County or its designee shall provide plans and specifications demonstrating that construction documents require the construction contractors to implement the following measures or provide information and data that demonstrate that implementation would not be feasible or practicable:</p> <ul style="list-style-type: none"> <li>a. Electricity shall come from power poles rather than diesel- or gasoline-fueled generators, compressors, or similar equipment;</li> <li>b. Construction parking shall be configured to minimize traffic interference;</li> <li>c. Construction trucks shall be routed away from congested streets and sensitive receptors;</li> <li>d. Construction activities that affect traffic flow on the arterial system shall be scheduled to off-peak hours to the extent practicable;</li> <li>e. Temporary traffic controls, such as a flag person(s), shall be provided where necessary to maintain smooth traffic flow, as necessary;</li> <li>f. Dedicated turn lanes for movement of construction equipment on- and off-site and signal synchronization shall be provided as necessary to maintain smooth traffic flow;</li> <li>g. All construction equipment shall be tuned and maintained in accordance with the manufacturer's specifications;</li> <li>h. Diesel truck idling time shall be five minutes or less, both on- and off-site;</li> <li>i. Work crews shall shut off diesel equipment when not in use; and</li> <li>j. Contractors and construction workers shall be encouraged to use ride-sharing and commute using Metrolink.</li> <li>k. For construction activities, require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and, if the lead agency determines that 2010 model year or new diesel trucks cannot be obtained, the lead agency shall use trucks that meet USEPA 2007 model year NOx emission requirements.</li> </ul> <p>The contractor shall comply with the identified requirements, and verification that the contractor has complied shall be confirmed by the Manager of Building &amp; Safety, or designee, during construction.</p> <p><b>DR AQ-5</b> Provided for Threshold 4.2-4, below.</p> <p><b>DR AQ-6</b> Fireplaces shall be limited to residential common areas, and none shall be provided in residential units. The specifications for each residential project within the Development Plan area shall be reviewed by the Manager of Building &amp; Safety, or designee, for compliance with this requirement prior to issuance of a building permit.</p> <p><b>MM AQ-1</b> Prior to the issuance of each grading permit, the County or its designee shall provide construction plans and specifications demonstrating that, after January 1, 2020, scrapers used for construction of the Project shall be required to meet Tier 4 Interim or equivalent off-road engine emissions standards. A copy of each unit's certified Tier specification shall be kept on site and available for inspection and</p>	

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
		<p>verification that the contractor has complied shall be confirmed by the Manager of Building &amp; Safety, or designee, during construction.</p> <p><b>MM AQ-2</b> Prior to the issuance of each non-residential building permit, the County or its designee shall provide plans and specifications demonstrating that the features listed below have been incorporated into the building designs. Proof of compliance shall be provided to the County prior to the issuance of occupancy permits.</p> <ul style="list-style-type: none"> <li>• For buildings with over ten tenant-occupants, changing/shower facilities shall be provided as specified in Section A5.106.4.3, Nonresidential Voluntary Measures, of the California Green Building Standards (CALGreen) Code.<sup>1</sup></li> <li>• Preferential parking for low-emitting, fuel-efficient, and carpool/van vehicles shall be provided, as specified in Section A5.106.5.1, Nonresidential Voluntary Measures, of the CALGreen Code.</li> <li>• Facilities shall be installed to support future electric vehicle charging at each non-residential building with 30 or more parking spaces. Installation shall be consistent with Section A5.106.5.3, Nonresidential Voluntary Measures (Tier 1), of the CALGreen Code.</li> </ul> <p><b>MM AQ-3</b> Prior to the issuance of each residential building permit, the County or its designee shall provide plans and specifications to the County demonstrating that the features listed below have been incorporated into the building designs or specifications. Proof of compliance shall be provided to the Manager of Building &amp; Safety, or designee, prior to the issuance of occupancy permits.</p> <ul style="list-style-type: none"> <li>• Visitor parking shall include preferentially located parking spaces for alternative-fueled vehicles.</li> <li>• Bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen Code.</li> <li>• Residential parking facilities shall include infrastructure to support electric vehicle charging stations consistent with the requirements of the CALGreen building standards codes.</li> <li>• Require use of electric lawn mowers and leaf blowers.</li> </ul> <p><b>MM AQ-4</b> Prior to issuance of each building permit for parking structures and parking lots with 20 or more parking spaces, the County or its designee shall provide plans and specifications demonstrating that the following features have been incorporated into the parking facility. Proof of compliance shall be provided to the Manager of Building &amp; Safety, or designee prior to the issuance of occupancy permits.</p> <ul style="list-style-type: none"> <li>• The parking facility shall include a minimum of five percent preferentially located parking spaces for alternative-fueled (electric, natural gas, or similar low-emitting technology) vehicles.</li> <li>• The parking facility shall include at least one electric vehicle charging station. Electrical lines shall be designed and sized to add additional charging stations for up to five percent of the total parking spaces when a demand is demonstrated. The design and installation shall be consistent with Section A4.106.8.2, Residential Voluntary Measures, of the CALGreen Code.</li> </ul>	

<sup>1</sup> Bicycle parking requirements are included in the CALGreen Code mandatory measures.

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
		<ul style="list-style-type: none"> <li>• For residential parking facilities, bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen code.</li> </ul> <p><b>MM AQ-5</b> The lease agreement for all non-residential uses shall require the tenants/operators to implement the features and procedures listed below. Proof of compliance shall be provided to the Manager, CEO Real Estate/Land Development (or Building &amp; Safety) within one month following the issuance of each occupancy permit.</p> <ul style="list-style-type: none"> <li>• Post signs stating that trucks shall not be left idling for prolonged periods (i.e., in excess of five minutes, as required by State law).</li> <li>• Affiliate with Spectrumotion or a similar employee program or develop an in-house transportation management program that promotes alternatives to solo commuting with fossil-fueled vehicles.</li> <li>• Post bus, Metrolink, and Amtrak schedules in conspicuous areas.</li> <li>• Configure employee work schedules around the Metrolink, OCTA, and iShuttle schedules to the extent reasonably feasible.</li> <li>• Charge fees for parking serving the office buildings.</li> <li>• Provide educational information on energy efficiency practices.</li> </ul> <p><b>MM AQ-6</b> The lease agreement for all residential uses shall require the operators to implement the features and procedures list below. Proof of compliance shall be provided to the Manager, CEO Real Estate/Land Development (or Building &amp; Safety) within one month following the issuance of each occupancy permit.</p> <ul style="list-style-type: none"> <li>• Affiliate with Spectrumotion or a similar program or develop an in-house transportation management program that promotes alternatives to solo commuting with fossil-fueled vehicles.</li> <li>• Post bus, Metrolink, and Amtrak schedules in conspicuous areas.</li> <li>• Educational information on energy efficiency practices.</li> </ul>	

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
<p><b>Threshold 4.2-3</b> Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).</p>	<p>Pursuant to Threshold 4.2-3, mass operational emissions of nonattainment pollutants and their precursors would be cumulatively considerable and a significant and unavoidable impact. Implementation of DR AQ-6 would avoid emissions from indoor residential fireplaces. Mitigation measures MM AQ-2 through MM AQ-6 would reduce vehicle travel, but the cumulative impact would still be significant and unavoidable. It would be speculative to attribute specific numerical increases in adverse health impacts to the Project's cumulatively considerable contribution to exceedances of the SCAQMD significance thresholds.</p> <p>Mass construction emissions of nonattainment pollutants and their precursors would be less than the SCAQMD CEQA significance thresholds and would be less than significant. The unmitigated emissions take into consideration the Project's implementation of DR AQ-1 through DR AQ-4. Implementation of MM AQ-1 would reduce the impacts to less than significant.</p>	<p>Refer to <b>DRs AQ-1 through AQ-4 and AQ-6</b> above. Refer to <b>MMs AQ-1 through AQ-6</b> above.</p>	<p>Significant and Unavoidable (Mass Operational Emissions)  Less Than Significant (Mass Construction Emissions)</p>
<p><b>Threshold 4.2-4</b> Expose sensitive receptors to substantial pollutant concentrations.</p>	<p>Exposure of sensitive receptors to criteria pollutants from on-site construction, to CO at congested intersections, or to off-site and future on-site receptors from TACs would be less than significant, pursuant to Threshold 4.2-4. DR AQ-5 would ensure that future sources of criteria or toxic air pollutants would comply with emissions limitation established by SCAQMD. No mitigation is required.</p>	<p><b>DR AQ-5</b> Commercial, medical office, or similar uses developed in the Development Plan area shall comply with SCAQMD Rule 201 and Regulation II (requiring a Permit to Construct prior to the installation of any equipment that may cause air contaminants) as well as Rule 203 (requiring a Permit to Operate prior to the use of any equipment that may cause air contaminants). These rules and regulation are required unless the equipment or aspects of the Project are exempt under Rule 219, which identifies those equipment, processes, or operations that do not require permits. Prior to issuance of the occupancy permit, the developer of each building or group of buildings shall provide the Manager of Building &amp; Safety, or designee with the SCAQMD-approved Permit to Construct and Permit to Operate or other sufficient proof of compliance with Rules 201 and 203.</p>	<p>Less Than Significant</p>
<p><b>Section 4.3 – Biological Resources</b></p>			
<p><b>Threshold 4.3-1</b> 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 or U.S. Fish and Wildlife Services?</p>	<p>The Project would impact suitable habitat for special status species. These impacts would be considered adverse, but less than significant. The Project has the potential to impact active burrowing owl burrows and/or nests of migratory birds and/or raptors. However, with implementation of DRs BIO-1 and BIO-2, these impacts would be avoided by limiting construction activities to the non-nesting season or by performance of a pre-construction nesting/bird survey and implementation of buffers excluding work activities around active nests, if observed during the pre-construction survey. Therefore, the potential impact on special status species would be less than significant, pursuant to Threshold 4.3-1. In addition, DR BIO-3 would minimize impacts on roosting bats through the performance of pre-construction bat surveys and installation of bat exclusionary devices</p>	<p><b>DR BIO-1</b> Per the <i>Staff Report on Burrowing Owl Mitigation</i> (CDFG 2012), the County, or its designee, shall ensure that a pre-construction survey for the burrowing owl is conducted by a qualified Biologist no less than 14 days prior to any ground disturbance for development of the study area. The pre-construction survey will include the Project site plus a 500-foot buffer (if access is available). If no active burrows are found, no further mitigation would be required.</p> <p>If an active burrow is observed outside the breeding season (September 1 to January 31) and it cannot be avoided, the burrowing owl shall be excluded from the burrow following methods described in CDFG 2012. One-way doors shall be used to exclude owls from the burrows. Once the burrow is unoccupied, as verified by site monitoring and scoping, the burrow shall be closed by a qualified Biologist who shall excavate the burrow by hand. If a burrow will be closed, the County, or its designee, shall contact CDFW to determine whether compensatory mitigation shall be required for the loss of the active burrow.</p> <p>If an active burrow is observed outside the breeding season (September 1 to January 31) and it can be avoided, a protective buffer shall be placed around the burrow per CDFG 2012 guidelines. The buffer shall range from 160 feet to 1,640</p>	<p>Less Than Significant</p>

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
	<p>such that potential Project impacts are less than significant.</p>	<p>feet depending on the level of impact and the time of year. The County, or its designee, shall contact the CDFW to determine whether a reduced buffer can be accommodated without adversely impacting occupied burrows.</p> <p>If an active burrow is observed during the breeding season (February 1 to August 31), the active burrow shall be protected until nesting activity has ended. A protective buffer shall be placed around the active burrow per CDFG 2012 guidelines. The buffer shall range from 650 to 1,640 feet depending on the level of impact and the time of year. The County, or its designee, shall contact CDFW to determine whether a reduced buffer can be accommodated without adversely impacting occupied burrows. Construction shall be allowed to proceed when the qualified Biologist has determined that fledglings have left the nest. Additionally, the County, or its designee, shall contact CDFW to determine whether compensatory mitigation shall be required for the long-term loss of the nesting burrow due to construction of the Project.</p> <p>Upon completion of the pre-construction burrowing owl survey, a Letter Report shall be prepared and submitted to the Manager of Building and Safety, or designee, for review and approval prior to any ground disturbing activities. If an active burrow is observed, the Letter Report shall include a description of the protective buffer that has been designated and a summary of any correspondence with CDFW.</p> <p><b>DR BIO-2</b> In order to avoid impacts on nesting birds and raptors (common or special status), the County, or its designee, shall ensure that vegetation clearing shall be conducted during the non-breeding season (i.e., generally between September 16 and February 14 for migratory birds; July 1 and January 31 for nesting raptors) to the extent feasible. If Project timing requires that vegetation clearing occur between February 1 and September 15 (incorporating the typical breeding season for migratory birds and raptors), then a pre-construction nesting bird/raptor survey shall be conducted by a qualified Biologist within three days prior to vegetation clearing. If vegetation clearing would occur during the raptor nesting season, the survey shall also include areas within 500 feet of the Project impact area to determine the presence or absence of active raptor nests. If no active nests are found, no further mitigation would be required.</p> <p>If an active nest is located within or adjacent to the construction area and the Biologist determines that work activities may impact nesting, the Biologist shall determine an appropriate buffer to protect the nest. The size of the buffer shall be based on site features, the sensitivity of the species, and the type of construction activity in order to prevent disruption of nesting activity. No construction activities shall be allowed in the buffer zone until the Biologist determines that nesting activity has ended. Construction may proceed within the buffer once the Biologist determines that nesting activity has ceased and fledglings have left the nest.</p> <p>Upon completion of the pre-construction nesting bird survey, a Letter Report shall be prepared and submitted to the Manager of Building and Safety, or designee, for review and approval prior to any ground disturbing activities. If an active nest is observed, the Letter Report shall include a description of the protective buffer that has been designated.</p> <p><b>DR BIO-3</b> Trimming or removal of mature trees should be conducted outside the bat maternity season (i.e., between March 1 and August 31). One month prior to building demolition, the County, or its designee, shall ensure that a pre-construction survey for roosting bats shall be conducted by a qualified Bat</p>	

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
		<p>Specialist. The survey shall consist of one diurnal (i.e., daytime) survey followed by an evening emergence survey to determine if any bats are day roosting in the buildings proposed for removal. If day-roosting bats are observed, bat-exclusionary devices shall be installed prior to construction or demolition activities. The bat exclusionary devices shall be designed to allow for bats to exit the roost areas but not re-enter. All designs shall be approved by a qualified Bat Specialist and installation shall be monitored by a qualified Bat Specialist.</p> <p>Upon completion of the pre-construction roosting bat survey, a Letter Report shall be prepared and submitted to the Manager of Building and Safety, or designee, for review and approval prior to any ground disturbing activities. If any active roosts are observed, the Letter Report shall include a description of exclusionary measures recommended.</p>	
<p><b>Threshold 4.3-2</b> Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Services?</p>	<p>The Project would impact approximately 0.911 acre of riparian habitat (i.e., mulefat scrub vegetation under the jurisdiction of the RWQCB and the CDFW). However, processing of permits/agreements/certifications from the RWQCB and the CDFW, and implementation of the permit requirements would mitigate any potentially significant impact on this resource. In addition, DR BIO-4 would ensure compliance with Section 401 of the Clean Water Act and Section 1602 of the California Fish and Game Code. Therefore, through compliance with existing laws and implementation of DR BIO-4 the potential impact on riparian habitat would be less than significant pursuant to Threshold 4.3-2.</p>	<p><b>DR BIO-4</b> Prior to any impacts on jurisdictional areas, the County, or its designee, shall obtain permits/agreements/certifications from the U.S. Army Corps of Engineers (USACE), the Regional Water Quality Control Board (RWQCB), and the CDFW for impacts on areas within these agencies' jurisdictions. A pre-application meeting with these agencies shall be scheduled prior to submittal of permit applications to discuss existing conditions; jurisdictional resources; impacts to these resources that would result from the Project; proposed avoidance, minimization, and mitigation measures to offset these impacts; and the regulatory permitting process. Following the pre-application meeting, the County or its designee, shall prepare and process a USACE Section 404 Permit; a RWQCB Section 401 Water Quality Certification; and a CDFW Section 1602 Streambed Alteration Agreement.</p> <p>The County, or its designee, shall implement/comply with the mitigation measures required by the resource agencies regarding impacts to areas under their respective jurisdictions. Compensatory mitigation may include restoration (i.e., re-establishment or rehabilitation); establishment (i.e., creation); enhancement; and/or preservation of jurisdictional resources. Compensatory mitigation may occur through permittee-responsible mitigation; payment to an in-lieu fee program; or purchase of compensatory mitigation credits from an approved mitigation bank. Mitigation ratios for impacts to USACE jurisdictional resources would be based on the USACE's Standard Operating Procedure for Determination of Mitigation Ratios. For permittee-responsible mitigation, the County, or its designee, shall consider mitigating jurisdictional impacts resulting from Project implementation through the preparation of a Habitat Mitigation Monitoring Plan (HMMP) prepared by a qualified Biologist. The preparation of an HMMP early in the process can help to accelerate and shorten the regulatory permitting process. If required by the resource agencies, the detailed HMMP shall contain the following items:</p> <ol style="list-style-type: none"> <li>1. <b>Responsibilities and Qualifications of the Personnel to Implement and Supervise the Plan.</b> The responsibilities of the County, or its designee, specialists, and maintenance personnel, as well as the qualifications of specialists and maintenance personnel, that will supervise and implement the plan will be specified.</li> <li>2. <b>Site Selection.</b> Site selection for restoration, establishment, enhancement, and/or preservation mitigation shall be determined in coordination with the County, or its designee, and resource agencies. The mitigation site(s) shall be located in a dedicated open space area or on land that shall be dedicated and/or purchased off site.</li> </ol>	<p>Less Than Significant</p>

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
		<ol style="list-style-type: none"> <li>3. <b>Site Preparation and Planting Implementation.</b> Site preparation shall include the following, as determined by specific site conditions and permit requirements: protection of existing native species; trash and weed removal; native species salvage and reuse (i.e., duff); soil treatments (i.e., imprinting, decompacting); temporary irrigation installation; erosion-control measures (i.e., rice or willow wattles); seed mix application; and container species.</li> <li>4. <b>Schedule.</b> A schedule, which includes planting to occur in late fall and early winter (between October 1 and March 1) shall be developed.</li> <li>5. <b>Maintenance Plan/Guidelines.</b> The maintenance plan shall include the following, as determined by specific site conditions and permit requirements: weed control; herbivory control; trash removal; irrigation system maintenance; maintenance training; and replacement planting.</li> <li>6. <b>Monitoring Plan.</b> The site shall be monitored and maintained for a minimum of five years to ensure successful establishment of riparian habitat within the restored and created areas. The monitoring plan shall include qualitative monitoring (i.e., photographs and general observations); quantitative monitoring (e.g., randomly placed transects and/or California Rapid Assessment Method [CRAM] analysis); performance criteria, as approved by the resource agencies; and monthly reports for the first year, quarterly reports thereafter, and annual reports for all five years.</li> <li>7. <b>Long-Term Preservation.</b> Long-term preservation of the site shall also be outlined in the restoration and enhancement plan to ensure the mitigation site is not impacted by future development.</li> </ol> <p>Although the monitoring plan is scheduled to last five years, if there is successful coverage prior to five years, the County, or its designee, may request to be released from monitoring requirements by the USACE and the CDFW.</p> <p>Once the USACE, CDFW, and RWQCB permits have been obtained, they shall be submitted to the Manager of Land Development, or designee, for review and approval prior to any ground disturbing activities.</p>	
<p><b>Threshold 4.3-3</b> Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.</p>	<p>The Project would not directly impact any federally protected wetlands; however, it would impact approximately 0.004 acre, 0.721 acre, and 1.801 acres of waters under the jurisdiction of the USACE, the RWQCB, and the CDFW, respectively. Processing of and compliance with permits/agreements/certifications required by applicable law would reduce any potentially significant indirect impacts to federally and State protected jurisdictional waters to a less than significant level. Therefore, through compliance with existing laws, the potential impact on federally and State protected jurisdictional waters would be less than significant, pursuant to Threshold 4.4-3.</p>	<p>Refer to <b>DR BIO-4</b> above and <b>DR HWQ-9</b> in Section 4.8, Hydrology and Water Quality, below.</p>	<p>Less Than Significant</p>

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
<p><b>Threshold 4.3-4</b> 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.</p>	<p>The study area is not located within a regional wildlife movement corridor and occurs in a largely developed landscape matrix. Therefore, implementation of the Project would not impact the planned regional wildlife movement corridor or result in fragmentation of habitat. Impacts on wildlife movement would be considered less than significant, and no mitigation would be required. As disclosed in the Existing Conditions discussion of this Section 4.3, no native resident or migratory fish exist within the study area and thus the Project will have no adverse impacts. The Project may impact active nests of migratory birds and/or raptors. However, impacts would be avoided by complying with DR BIO-2, a measure limiting construction activities to the non-nesting season or performance of a pre-construction nesting/bird survey and implementation of buffers excluding work activities around active nests, if observed during the pre-construction survey. In addition, compliance with DR BIO-5 would ensure that rodenticide impacts on raptors and predator mammals due to Project construction are less than significant. Therefore, the potential impact to nesting birds and raptors and rodenticide impacts on raptors and predator mammals would be less than significant, pursuant to Threshold 4.4-4.</p>	<p>Refer to <b>DR BIO-2</b> above and <b>DR BIO-5</b> below.</p> <p><b>DR BIO-5</b> Anticoagulant rodenticides (e.g., difenacoum, brodifacoum, bromadiolone difethialone, warfarin, chlorophaninone, and diphacinone) shall be prohibited from being used throughout the Project. Future leases will include language related to landscaping and maintenance of open space areas prohibiting the use of anticoagulant rodenticides.</p>	<p>Less Than Significant</p>
<p><b>Threshold 4.3-5</b> Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.</p>	<p>The Project would not conflict with applicable local ordinances protecting biological resources. Therefore, there would be no impact, pursuant to Threshold 4.4-5.</p>	<p>No mitigation is required.</p>	<p>No Impact</p>
<p><b>Threshold 4.3-6</b> Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.</p>	<p>The Project would not conflict with provisions of the NCCP/HCP. Therefore, there would be no impact, pursuant to Threshold 4.4-6.</p>	<p>No mitigation is required.</p>	<p>No Impact</p>

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
<b>Section 4.4 – Cultural Resources</b>			
<p><b>Threshold 4.4-1</b> Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.</p>	<p>Pursuant to Threshold 4.4-1, the Project has a low potential to cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. However, implementation of MM CULT-1 would reduce potential impacts to less than significant levels should buried resources of that nature be discovered as part of grading activities.</p>	<p><b>MM CULT-1 Archaeological Observation and Salvage.</b> Prior to the issuance of any grading permit in which native soil is disturbed, the County or its designee shall provide written evidence to the Manager of Building &amp; Safety, or designee, that the County or its designee has retained a County-certified archaeologist to observe grading activities and to salvage and catalogue archaeological resources as necessary. The archaeologist shall be present at the pre-grade conference, shall establish procedures for archaeological resource surveillance, and shall establish, in cooperation with the County or its designee, procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the artifacts as appropriate. If the archaeological resources are found to be significant, the archaeological observer shall determine appropriate actions, in cooperation with the County or its designee, for exploration and/or salvage.</p> <p>Prior to the release of the grading bond, the County or its designee shall obtain approval of the archaeologist’s follow-up report from the Manager of Building &amp; Safety, or designee. The report shall include the period of inspection, an analysis of any artifacts found, and the present repository of the artifacts. The archaeologist shall prepare excavated material to the point of identification. The County or its designee shall offer excavated finds for curatorial purposes to the County of Orange, or its designee, on a first refusal basis. These actions, as well as final mitigation and disposition of the resources, shall be subject to the approval of the Manager of Building &amp; Safety, or designee. The County or its designee shall pay curatorial fees if an applicable fee program has been adopted by the Board of Supervisors and such fee program is in effect at the time of presentation of the materials to the County or its designee, all in a manner meeting the approval of the Manager of Building &amp; Safety, or designee.</p>	<p>Less Than Significant</p>
<p><b>Threshold 4.4-2</b> Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.</p>	<p>Pursuant to Threshold 4.4-2, the Project has a moderate potential to directly or indirectly destroy a unique paleontological resource or site. However, implementation of MM CULT-2 would reduce potential impacts to less than significant should unknown buried resources be discovered as part of grading activities. Additionally, due to lack of unique geologic features on the site, no impacts to such features would occur and no mitigation is required.</p>	<p><b>MM CULT-2 Paleontological Observation and Salvage.</b> Prior to the issuance of any grading permit in which native soil is disturbed, the County or its designee shall provide written evidence to the Manager of Building &amp; Safety, or designee, that the County or its designee has retained a County-certified paleontologist to observe grading activities and to salvage and catalogue fossils as necessary. The paleontologist shall be present at the pre-grade conference; shall establish procedures for paleontological resource surveillance; and shall establish, in cooperation with the County or its designee, procedures for temporarily halting or redirecting work to permit sampling, identification, and evaluation of the fossils. If the paleontological resources are found to be significant, the paleontologist shall determine appropriate actions, in cooperation with the County or its designee, to ensure proper exploration and/or salvage.</p> <p>Prior to the release of the grading bond, the County or its designee shall submit the paleontologist’s follow up report for approval by the Manager of Building &amp; Safety, or designee. The report shall include the period of inspection, a catalogue and analysis of the fossils found, and the present repository of the fossils. The County or its designee shall prepare excavated material to the point of identification and shall offer excavated finds for curatorial purposes to the County of Orange, or its designee, on a first refusal basis. These actions, as well as final mitigation and disposition of the resources, shall be subject to approval by Manager of Building &amp; Safety, or designee. The County or its designee shall pay curatorial fees if an applicable fee program has been adopted by the Board of Supervisors and such fee program is in effect at the time of presentation of</p>	<p>Less Than Significant</p>

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
		the materials to the County of Orange or its designee, all in a manner meeting the approval of the Manager of Building & Safety, or designee.	
<p><b>Threshold 4.4-3</b> Disturb any human remains, including those interred outside of formal cemeteries.</p>	<p>Pursuant to Threshold 4.4-3, Project activities are not expected to disturb human remains. However, if human remains are encountered during grading activities, implementation of MM CULT-3 would reduce potential impacts to human remains to a less than significant level.</p>	<p><b>MM CULT-3 Human Remains.</b> If human remains are encountered during ground-disturbing activities, Section 7050.5 of the <i>California Health and Safety Code</i> states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition of the materials pursuant to Section 5097.98 of the <i>California Public Resources Code</i>. The provisions of Section 15064.5 of the California Environmental Quality Act Guidelines shall also be followed. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner shall notify the Native American Heritage Commission (NAHC). The NAHC will determine and notify a Most Likely Descendent (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The descendent must complete the inspection within 24 hours of notification by the NAHC. The MLD may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. These requirements shall be included as notes on the contractor specification and verified by the Development Services Department, prior to issuance of grading permits.</p>	<p>Less Than Significant</p>
<p><b>Section 4.5 – Geology and Soils</b></p>			
<p><b>Threshold 4.5-1</b> Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:</p> <ul style="list-style-type: none"> <li>i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?</li> <li>ii) Strong seismic ground shaking?</li> <li>iii) Seismic-related ground failure, including liquefaction?</li> </ul>	<p>The Project site is not included in an Alquist-Priolo Earthquake Fault Zone and there are no known active or potentially active faults traversing the Project site. Impacts associated with surface fault rupture are less than significant, pursuant to Threshold 4.5-1. The Project site is in a seismically active area that would likely experience strong ground shaking during the life of any project developed thereon. However, conformance with existing regulations (2013 CBC) and DR GEO-1 would reduce potentially significant impacts associated with seismic shaking and seismic ground failure in the form of liquefaction, seismically induced settlement, and lateral spreading to a less than significant level.</p>	<p><b>DR GEO-1</b> Prior to the issuance of a grading permit, the County, or its designee, shall submit a geotechnical report to the Manager of Building &amp; Safety, or designee, for approval. The report shall include the information and be in the form as required by the County Grading Manual. All grading proposed on the Project site must be consistent with the OC Grading and Excavation Code.</p>	<p>Less Than Significant</p>
<p><b>Threshold 4.5-2</b> Result in substantial soil erosion or the loss of topsoil.</p>	<p>Grading activities would increase the potential for soil erosion and loss of top soil. With the incorporation of construction BMPs as described in Section 4.8, Hydrology and Water Quality, implementation of DR HWQ-7 through DR HWQ-10 in Section 4.8, Hydrology and Water Quality, and compliance with applicable laws, Project impacts on soil erosion and loss of topsoil would be less than significant, pursuant to Threshold 4.5-2.</p>	<p>Refer to <b>DR HWQ-7</b> through <b>DR HWQ-10</b> in Section 4.8, Hydrology and Water Quality, below.</p>	<p>Less Than Significant</p>

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
<p><b>Threshold 4.5-3</b> Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.</p>	<p>The Project site is not located in an area with documented landslides and the potential for collapse/subsidence and soil corrosion is low. However, conformance with existing regulations (2013 CBC) and DR GEO-1 would reduce potentially significant impacts associated with unstable soils/site conditions and any impacts associated with landslides, collapse/subsidence, or corrosion would be less than significant. Similarly, liquefaction, seismically induced settlement, and lateral spreading (Threshold 4.5.1) would be reduced to a less than significant level with conformance with existing regulations (2013 CBC) and DR-GEO-1.</p>	<p>Refer to <b>DR GEO-1</b> above.</p>	<p>Less Than Significant</p>
<p><b>Threshold 4.5-4</b> Be located on expansive soils, as defined in Table 18-1-B of the California Building Code (1994), creating substantial risks to life or property.</p>	<p>Based on the Preliminary Geotechnical Investigation (Leighton and Associates, Inc. 2014), the Project site soil has medium expansion potential. Consistent with DR GEO-1 more detailed evaluation of near-surface soils would be conducted and appropriate design measures imposed. Compliance with these measures would ensure impacts associated with expansive soils would be less than significant, pursuant to Threshold 4.5-4.</p>	<p>Refer to <b>DR GEO-1</b> above.</p>	<p>Less Than Significant</p>
<p><b>Section 4.6 – Greenhouse Gas Emissions</b></p>			
<p><b>Threshold 4.6-1</b> Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.</p>	<p>Pursuant to Threshold 4.6-1, the Project’s GHG Emissions would be less than the SCAQMD-recommended plan-level efficiency threshold but would exceed the SCAQMD-recommended project-level efficiency threshold. Implementation of DR GHG-1 and DR GHG-2 and MM GHG-1 through MM GHG-6 would reduce the emissions to a level of less than significant.</p>	<p><b>DR GHG-1</b> Projects shall be designed in accordance with the applicable Title 24 Energy Efficiency Standards for Residential and Nonresidential Buildings (<i>California Code of Regulations</i> [CCR], Title 24, Part 6). These standards are updated, nominally every three years, to incorporate improved energy efficiency technologies and methods. The Manager of Building &amp; Safety, or designee shall ensure compliance prior to the issuance of each building permit.</p> <p><b>DR GHG-2</b> Projects shall be designed in accordance with the applicable California Green Building Standards (CALGreen) Code (24 CCR 11). The Manager of Building &amp; Safety, or designee shall ensure compliance prior to the issuance of each building permit.</p> <p><b>MM GHG-1</b> The Project shall incorporate renewable energy generation with the capacity to generate at least 6,168,000 kilowatt hours (kWh) of electricity per year at buildout. Prior to the issuance of each building permit, the Manager of Building &amp; Safety, or designee shall review the total amount of installed and planned renewable energy to ensure the Project is on trajectory to meet the buildout requirement.</p> <p><b>MM GHG-2</b> Low-energy Energy Star®-compliant or equivalent residential appliances shall be exclusively offered by residential builders for each appliance that is rated by Energy Star (e.g., refrigerator, clothes washer, dishwasher), or achieves an efficiency that is equivalent to the 2016 Energy Star compliance standard. Low-energy Energy Star®-compliant or equivalent commercial appliances shall be installed in the hotel. All ground lease agreements between the County and a residential developer or the CC&amp;Rs shall require replacement appliances to meet low-energy Energy Star®-compliant standards. The Manager of Building &amp; Safety, or designee shall ensure compliance prior to the issuance of each building permit.</p>	<p>Less than significant..</p>

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
		<p><b>MM GHG-3</b> High efficiency lighting (light-emitting diode [LED]) shall be used for all residential, office, retail, and outdoor (streets, pathways, parks, and parking structures) lighting applications. All ground lease agreements, between the County and developers, or the CC&amp;Rs, shall require replacement lighting to use high efficiency bulbs. The Manager of Building &amp; Safety, or designee shall ensure compliance prior to the issuance of each building permit.</p> <p><b>MM GHG-4</b> The County or its designee shall provide plans and specifications demonstrating that the following features have been incorporated into all new buildings (these requirements would not apply to any retrofitting of Building 317). Proof of compliance shall be provided to the Manager of Building &amp; Safety, or his/her designee prior to the issuance of occupancy permits.</p> <ul style="list-style-type: none"> <li>• Documentation that design and construction elements used would require buildings to be consistent with Leadership in Energy and Environmental Design (LEED) standards.</li> <li>• Installation of high albedo roof membranes.</li> <li>• Installation of formaldehyde free insulation in all buildings.</li> <li>• Use of locally sourced (i.e., Southern California) gypsum board.</li> </ul> <p><b>MM GHG-5</b> The County’s master lease and any subsequent replacement leases shall require landscape maintenance personnel to use electric lawnmowers and leaf blowers for all routine landscape maintenance.</p> <p><b>MM GHG-6</b> In conjunction with Level I, II, and III reviews, each applicant shall demonstrate how the proposed development will (i) satisfy its proportional contribution toward the Project’s overall GHG emission reduction requirement as identified in MM GHG-1 through MM GHG-3 in Section 4.6, Greenhouse Gas Emissions, of the Draft Program EIR (or achieve equivalent reduction through other qualifying measures); and (ii) incorporate elements from the menu of options, provided below, sufficient to further reduce for a period of 30 years that application’s incremental contribution to the Project’s overall GHG emissions to a less than significant level, which is defined as a performance standard equal to 3.0 MTCO<sub>2e</sub>/SP/year in 2030. For purposes of implementing this mitigation measure, each development project’s incremental contribution to the overall generation of GHG shall be determined using the application’s service population characteristics, which are defined as 1.88 persons per dwelling unit for residential development; 1 employees per 275 square feet of commercial/office; 1 employees per 257 square feet of retail; and 0.5 employees per room for the hotel. For example, if an application proposes a total of 500 dwelling units, based on the application’s service population of 940 (500 x 1.88), GHG emissions will be less than significant if the application’s net GHG emissions with mitigation are less than 2,820 (940 x 3.0) MTCO<sub>2e</sub>/year for year 2030.</p> <p>The GHG emissions calculation for 2030 shall be submitted using the most current version of CalEEMod or subsequent emissions calculator model accepted by SCAQMD. Mobile source emissions shall be calculated using the proposed project’s average daily trips. Furthermore, each application shall mitigate for the Project’s construction emissions based on a pro-rata share of the total Project’s construction emissions. This pro rata share shall be calculated using the total construction emissions identified in the Final Program EIR for the approved Project divided by the portion of proposed buildable area attributable to the development application. (For example, for the Draft Program EIR identified annual construction emissions of approximately 565 MTCO<sub>2e</sub> (16,964 MTCO<sub>2e</sub>/30</p>	

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
		<p>years) and 76.55<sup>2</sup> acres of developable area. If an application proposed development on 7.65 acres, that application would add emissions equal to 10 percent (56.5 MTCO<sub>2e</sub>) to its annual operational GHG emissions inventory.)</p> <p>Applicants shall identify the GHG emission reduction measures proposed by the application (or previously approved excess reductions achieved by other applications within the Project) that will bring the application's GHG emissions below the SCAQMD-recommended project level significance threshold of 3.0 MTCO<sub>2e</sub>/SP/year for 2030. Applications shall be accompanied by a GHG study/plan prepared by a qualified consultant, to substantiate the relative emissions reduction associated with each proposed reduction measure identified in the application.</p> <p>In addition to the GHG emission reduction measures identified elsewhere in the Final Program EIR, the following presents a menu of GHG emissions reduction options that the applicant may pick from to achieve GHG emission reductions required to satisfy the performance standard specified in this mitigation measure. In conjunction with Level I, II, and III reviews, the County will review the applicant submitted GHG study/plan prepared by a qualified consultant to quantify the relative emissions reduction associated with each option selected for the application. The Level I, II and III approvals will identify the approved GHG reduction measures incorporated into the application in order to achieve the less than significant GHG emissions. The measures shall be incorporated by the County as conditions of approval that will be demonstrated as part of plan check and permitting process. The County shall also verify implementation of the measures prior to the issuance of the use and occupancy permit for the application.</p> <ul style="list-style-type: none"> <li>• Install solar water heating for swimming pools in private recreation centers in lieu of natural gas heating. The GHG emissions reduction is the difference between the total GHG emissions from the annual energy usage associated with electricity and natural gas and the energy usage with the installation of solar equipment. The electricity and natural gas energy usage factors for swimming pools shall be based on the energy consumption identified in a published pools study, the Department of Energy estimates or other reliable methodology. The analysis would be scaled to represent energy consumption per year per volume of the pool and the contractor specifications for the specific equipment used.</li> <li>• Prepare a Transportation Demand Management Plan (TDM Plan) enhancing the use of alternative transportation modes through the provision of incentives, subsidies, bike-sharing and car-sharing programs, and other technology-based programs. Identify key implementation actions that would reduce vehicle miles traveled (VMT).</li> <li>• Install renewable energy power generation beyond the amount, if any, the application is getting credit for pursuant to MM GHG-1. The GHG emissions reduction would be calculated based on the amount of renewable energy provided.</li> <li>• Install electric vehicle charging stations capable of charging on- or off-site parking spaces that would achieve the same or better functionality as Level 2 charging stations.</li> </ul>	

<sup>2</sup> KTG. 2017 (July). 100-Acre Parcel Land Use Summary Excel Spreadsheet.

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
		<ul style="list-style-type: none"> <li>• Reduce GHG emissions by purchasing and retiring carbon credits that have been issued by a recognized and reputable accredited carbon registry. The credits purchased must be real, quantifiable, enforceable, validated, and for the period of time specified in the application's GHG emissions analysis.</li> <li>• Implement other quantifiable, GHG emission reduction measures identified and substantiated in the GHG study/plan submitted with each application.</li> </ul>	
<p><b>Threshold 4.6-2</b> Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.</p>	<p>Pursuant to Threshold 4.6-2, because of the lack of regulatory guidance regarding the specific method the State will utilize to achieve SB 32 compliance and despite all the elements of the Project that are consistent with existing plans, policies and regulations adopted to reduce GHG emissions, the DEIR concludes that Project GHG Emissions impacts would be less than significant.</p>	<p>Refer to <b>DR GHG-1</b> and <b>DR GHG-2</b> and <b>MM GHG-1</b> through <b>MM GHG-3</b>, above.</p>	<p>Less than significant</p>
<p><b>Section 4.7 – Hazards and Hazardous Materials</b></p>			
<p><b>Threshold 4.7-1</b> Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.</p>	<p><u>Hazardous Building Materials</u> Significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment due to hazardous building materials present or presumed to be present in existing on-site buildings/structures and facilities are potentially significant. Implementation of development requirements that would address hazardous building materials include DR HAZ-1, which includes testing and abatement of hazardous building materials, and DR HAZ-2, which addresses transportation and disposal of hazardous waste. With implementation of these DRs, impacts would be less than significant pursuant to Threshold 4.7-1.</p> <p><u>Railroad Ties</u> Significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment due to railroad ties present at the Project site are potentially significant without mitigation. Mitigation Measure (MM) HAZ-1 addresses removal and off-site disposal of railroad ties, thereby reducing the impacts to less than significant pursuant to Threshold 4.7-1.</p>	<p><b>DR HAZ-1 Hazardous Building Materials.</b> Prior to demolition or renovation for reuse of buildings/structures or facilities, building materials shall be carefully assessed for the presence of lead-based paint (LBP), asbestos-containing materials (ACM), and other common hazardous building materials (e.g., polychlorinated biphenyl [PCB]-containing lighting ballasts and mercury-containing light tubes and switches). Their removal, where necessary, must comply with State and federal regulations, including Occupational Safety and Health Administration (OSHA) regulations in the <i>Code of Federal Regulations</i> (specifically Title 29, Part 1926) and South Coast Air Quality Management District (SCAQMD) Rule 1403. The OSHA rule establishes standards for occupational health and environmental controls for lead exposure and includes requirements addressing exposure assessment, methods of compliance, respiratory protection, protective clothing and equipment, hygiene facilities and practices, medical surveillance, medical removal protection, employee information and training, signs, recordkeeping, and observation of monitoring.</p> <p>Rule 1402 specifies work practices with the goal of minimizing asbestos emissions during building demolition and renovation activities, including the removal and associated disturbance of ACMs. During demolition, grading, and excavation, workers shall comply with the requirements of the <i>California Code of Regulations</i> (specifically, Title 8, Section 1532.1 and 1529), which provide for exposure limits, exposure monitoring, respiratory protection, and good working practice by workers exposed to lead and asbestos, respectively. LBP and ACM-contaminated debris and other wastes shall be managed and disposed of in accordance with the applicable provision of the <i>California Health and Safety Code</i>. Specific requirements for LBP include (i.e., Title 17, Division 1, Chapter 8) procedures that must be followed for accreditation, certification, and work practices for lead-based paint and lead hazards. Section 36100 specifically sets forth requirements for lead-based paint abatement in public and residential buildings. The requirements for demolition and renovation activities related to ACM include asbestos surveying; notification; ACM removal procedures and time schedules; ACM handling and cleanup procedures; and storage, disposal, and landfill disposal requirements for asbestos-containing waste materials.</p> <p><b>DR HAZ-2 Management of Hazardous Waste.</b> During site demolition, grading, and construction activities, hazardous contaminated soils or other hazardous</p>	<p>Less Than Significant</p>

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
		<p>materials shall be managed in accordance with the requirements of Title 22, Division 4.5 of the <i>California Code of Regulations</i>, the U.S. Department of Transportation regulations in the <i>Code of Federal Regulations</i> (specifically, Title 49, Hazardous Materials Transportation Act and Title 40, Part 263, Subtitle C of Resource Conservation and Recovery Act), California Department of Transportation (Caltrans) standards, and Occupational Safety and Health Administration (OSHA) standards. Title 22 sets forth the requirements with which hazardous-waste generators, transporters, and owners or operators of treatment, storage, or disposal facilities must comply. These regulations include the requirements for packaging, storing, labeling, reporting, and generally managing and disposing of hazardous waste, which shall be done in a manner meeting the satisfaction of the Manager, Orange County Health Care Agency (OCHCA)/Hazardous Materials Program prior to shipment. In addition, the regulations identify standards applicable to transporters of hazardous waste such as the requirements for transporting shipments of hazardous waste, manifesting, vehicle registration, and procedures to enact in the case of emergency accidental discharges during transportation. The County shall sign necessary hazardous and non-hazardous waste manifests as "Generator".</p> <p><b>MM HAZ-1</b> Prior to commencement of grading activities, railroad ties will be removed and recycled or properly disposed of offsite. If railroad ties split, disintegrate, or break during removal, fragments of railroad ties that can be visually identified and that are large enough to physically remove will be collected for disposal. Splintered or disintegrated railroad tie materials that have been mixed with soil or track ballast will be collected along with the minimum amount of soil or track ballast necessary to remove them based on visual identification. This requirement shall be included on the contractors' specifications and verified by the OC Development Services.</p>	
<p><b>Threshold 4.7-2</b> 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.</p>	<p><u>Unknown Soil Impacts</u> Significant hazard to the public or the environment due to unknown soil impacts would be potentially significant. MM HAZ-2 requires development of a Soils Management Plan to address unknown hazardous-materials impacts and/or petroleum-hydrocarbon impacts to soil that are identified during grading. DR HAZ-2 addresses transportation and disposal of hazardous-materials-impacted soils and DR HAZ-3 addresses assessment, removal, and closure of unknown USTs should they be encountered during grading. With implementation of MM HAZ-2, DR HAZ-2, and DR HAZ-3, impacts during and after construction would be less than significant pursuant to Threshold 4.7-2.</p> <p><u>Potential Petroleum-Hydrocarbon-Impacted Soils at LOCs</u> Significant hazard to the public or the environment due to petroleum-hydrocarbon impacts would be potentially significant at each of the described IRP Sites and LOCs. MM HAZ-2 requires development of a Soils Management Plan to address petroleum-hydrocarbon impacts. With implementation of this mitigation measure, impacts during and after</p>	<p>Refer to <b>DR HAZ-2</b> above.</p> <p><b>DR HAZ-3 Underground Storage Tanks.</b> If any underground storage tanks (USTs) are encountered during site grading or excavation activities, they shall be removed in accordance with the existing standards and regulations of, and oversight by, the Manager, OCHCA/Hazardous Materials Program, based on compliance authority granted through the <i>California Code of Regulations</i> (specifically, Title 23, Division 3, Chapter 16, Underground Tank Regulations). The process for UST removal is detailed in the Orange County Health Care Agency's (OCHCA's) "Underground Storage Tanks: The Basics" manual. Soil samples from areas where storage tanks have been removed or where soil contamination is suspected shall be analyzed for hydrocarbons including gasoline and diesel in accordance with procedures set forth by the OCHCA. If hydrocarbons are identified in the soil, the appropriate response/remedial measures will be implemented as directed by OCHCA with support review from the Regional Water Quality Control Board (RWQCB) until all specified requirements are satisfied and a Tank Closure Letter is issued. Any aboveground storage tank (AST) in existence at the commencement of site development shall be removed in accordance with all applicable regulations under the oversight of Orange County Fire Authority (OCFA). Compliance requirements relative to the removal/closure of storage tanks are set forth in Sections 25280 through 25299 of the <i>California Health and Safety Code</i>.</p> <p><b>DR HAZ-4 Changes from Non-residential to Residential Land Use.</b> In conjunction with Level I, II, or III reviews for any project that proposes residential uses in planning areas identified for other land uses on the Conceptual Site Plan (Exhibit 3-5 in the Draft Program EIR 620), the developer shall submit supplemental information documenting re-evaluation of the potential residential risks for those planning</p>	<p>Less Than Significant</p>

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
	<p>construction would be less than significant pursuant to Threshold 4.7-2.</p> <p><u>Installation Restoration Program Site 8 – Defense Realization and Marketing Office Storage Area</u></p> <p>Given commercial re-use for all the above referenced sites and residential, use for Planning Area 14, non-radiological impacts for all Units of IRP Site 8 are less than significant without mitigation. Radiological impacts in IRP Site 8 Units 1 and 4 would be potentially significant without mitigation. MM HAZ-3 will address potential radiological impacts at IRP Site 8 Units 1 and 4. With implementation of this mitigation measure and compliance with applicable laws, impacts would be less than significant pursuant to Threshold 4.7-2.</p> <p><u>Installation Restoration Program Site 12 – Sludge Drying Beds</u></p> <p>Impacts at IRP Site 12 Units 1 and 2 are potentially significant without mitigation. MM HAZ-4 would address impacts in Units 1 and 2 and reduce hazards to less than significant pursuant to Threshold 4.7-2. Based on the available information regarding existing cumulative human health risks in Unit 3 a mitigation measure would be required. MM HAZ-5 would address impacts in Unit 3 and reduce hazards to less than significant pursuant to Threshold 4.7-2. Hazards in Unit 4 would be less than significant without mitigation pursuant to Threshold 4.7-2.</p> <p><u>Installation Restoration Program Site 21 – Materials Management Group</u></p> <p>Impacts due to the catch basin would be potentially significant without mitigation. MM HAZ-6 would address impacts at the catch basin and reduce impacts to less than significant pursuant to Threshold 4.7-2.</p> <p><u>Installation Restoration Program Site 24 – Volatile Organic Compound Source Area/Vadose Zone</u></p> <p>Given commercial re-use, impacts due to VOCs in soil gas within non-LIFOC areas would be less than significant without mitigation.</p> <p>Impacts due to VOCs in soil gas within the LIFOC area were not able to be tested. Therefore, MM HAZ-7 would address this data gap and potential impacts due to VOCs present in soil gas. With implementation of this mitigation measure and compliance with applicable laws impacts would be less than significant pursuant to Threshold 4.7-2.</p>	<p>area(s). The supplemental information shall identify measures, as appropriate, to be completed in accordance with regulatory guidance per the California Health and Safety Code, that would reduce any identified cumulative human health risk to levels acceptable for the proposed residential land use. The supplemental information submitted shall include concurrence from the applicable regulatory agency(ies) (e.g., OEHHA, DTSC, RWQCB, or EPA) that implementation of the mitigation measures would reduce cumulative human health risks to acceptable levels for the proposed land use. The supplemental information shall be done in a manner meeting the satisfaction of the Manager, Orange County Health Care Agency (OCHCA)/Hazardous Materials Program.</p> <p><b>MM HAZ-2</b> Prior to initial grading, a site-specific Soils Management Plan will be developed to be implemented during grading, and will include measures for monitoring soil conditions for evidence of impacts and contingency measures in the event that impacted soils (including, but not limited to, petroleum hydrocarbons and other volatile organic compounds [VOCs]) are encountered during grading as evidenced by visual staining, olfactory perception, or field testing. The objective of the Soils Management Plan is to reduce exposures to impacted soils to less than significant levels, as defined by applicable law, for construction and utility workers during grading and construction phases of the Project and for future residents after construction is complete. Field testing will consist of periodically screening soils with a photoionization detector (PID) in accordance with SCAQMD Rule 1166. Grading equipment operators and environmental professionals performing Rule 1166 monitoring will be trained in identifying evidence of contaminated soils. The Soils Management Plan will specifically identify LOCs where the main chemical of potential concern (COPC) is petroleum hydrocarbons and other locations of concern (LOCs)/installation restoration programs (IRPs) where petroleum hydrocarbons have been identified and may still be present. The Soils Management Plan will include, at a minimum, identification of contaminants through use of field equipment (e.g., PID); sampling and laboratory analyses, if necessary; segregation; temporary stockpiling specifications; and on-site or off-site treatment and/or off-site disposal options in accordance with applicable law. This Soils Management Plan will be submitted to the Manager of Building &amp; Safety for review and approval.</p> <p><b>MM HAZ-3</b> Prior to initial grading, an independent radiological survey will be performed at IRP Site 8, Units 1 and 4 using the Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM) guidance to assess the cumulative human health risks associated with remaining radiological impacts above site background levels. If cumulative human health risks are greater than acceptable levels for the proposed land use, targeted soil excavation and off-site disposal will be performed until cumulative human health risks (above background) are below acceptable levels.</p> <p><b>MM HAZ-4</b> Prior to initial grading, data collected during the Phase I and Phase II RIs (JEG 1993b; BNI, 1997) for IRP Site 12 Units 1 and 2 will be used along with current exposure criteria and toxicity values to re-calculate cumulative human health risks, and if risks exceed acceptable threshold levels, additional sampling, targeted excavation, and/or confirmation sampling will be performed to assess conditions or to remove impacted soils in order to reduce cumulative human health risks to acceptable levels for the proposed land use (currently residential), to the satisfaction of the appropriate regulatory agency(ies) (e.g., OEHHA, DTSC, RWQCB, or EPA). Alternatively, if supported by risk assessment calculations, soils in the top several feet of IRP Site 12 Units 1 and 2 may be removed and stockpiled for use as fill material in Project site areas planned for non-residential use. If the planned</p>	

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
	<p><u>Installation Restoration Program Site 24 – Volatile Organic Compound Source Area/Shallow Groundwater Unit</u></p> <p>Impacts to the operation and maintenance of the groundwater treatment system and monitoring of the groundwater plume at IRP Site 24 would be potentially significant without mitigation. MM HAZ-8 would address protection of the system during grading and construction. With implementation of this measure, impacts would be reduced to less than significant pursuant to Threshold 4.7-2.</p> <p><u>Miscellaneous Location of Concern P1 Unit 2 – Past Pesticide Storage Area</u></p> <p>Given open space re-use, impacts to soil at MSC P1 Unit 2 would be less than significant without mitigation pursuant to Threshold 4.7-2.</p>	<p>land use changes from residential to non-residential, this mitigation measure will not be applied.</p> <p><b>MM HAZ-5</b> Prior to initial grading, confirmation sampling results for identified chemicals of concern (COCs) collected during remediation of IRP Site 12 Unit 3 if available, will be evaluated and cumulative human health risks will be calculated (utilizing risk-based concentrations [RBCs] that were developed and used as cleanup goals) and will be compared to acceptable levels for the proposed land use (currently residential). If calculated cumulative human health risks exceed acceptable threshold levels, additional sampling, targeted excavation, and/or confirmation sampling will be performed to remove impacted soils in order to reduce cumulative human health risks to acceptable levels for the proposed land use, to the satisfaction of the appropriate regulatory agency(ies) (e.g., OEHHA, DTSC, RWQCB, or EPA). Alternatively, if supported by risk assessment calculations, soils in the top several feet of IRP Site 12 Unit 3 may be removed and stockpiled for use as fill material in Project site areas planned for non-residential use. If the planned land use changes from residential to non-residential, this mitigation measure will not be applied.</p> <p><b>MM HAZ-6</b> Prior to initial grading, the sediment within the IRP Site 21 catch basin and/or the connected culvert will be removed, placed into 55-gallon drums, and profiled for disposal (note: depending on observations made during removal of the concrete catch basin, bedding material and underlying soils may also be removed and disposed of). If necessary to remove the sediment, the catch basin will be pressure washed and liquids will be collected, drummed, and profiled. Upon completion of sediment removal, the catch basin will be removed and properly disposed. Confirmation sampling will be performed to verify post-removal concentrations of the risk-driving chemicals of concern (COCs) (i.e., PAHs) are below the USEPA's industrial Regional Screening Levels (RSLs). Subsequent rounds of excavation and confirmation sampling will be performed until post-removal concentrations of PAHs are below the USEPA's industrial RSLs.</p> <p><b>MM HAZ-7</b> Prior to initial grading, soil vapor sampling will be performed within the Lease in Furtherance of Conveyance (LIFOC) area of the Project site. Sampling will be similar to the sampling that was completed during the recent soil gas investigation (Geosyntec 2015) in non-LIFOC areas. The probes will be sampled according to Advisory Active Soil Gas Investigations (DTSC et. al. 2015) and results will be compared to appropriate risk-based screening levels as in the 100-Acre Parcel Soil Gas Assessment Report (Geosyntec 2015). If concentrations are below screening levels, no further mitigation is required. If concentrations are above screening levels, other mitigation measures that are standard engineering practice (i.e., commonly-employed vapor intrusion mitigation technologies) shall be developed to reduce cumulative human health risks to acceptable levels for the proposed land use, to the satisfaction of the appropriate regulatory agency(ies) (e.g., OEHHA, DTSC, RWQCB, or EPA)</p> <p><b>MM HAZ-8</b> Prior to initial grading, the County will secure from the DoN an updated, complete listing, survey coordinates, and map showing locations of existing groundwater wells related to past and current remedial activities on the Project site. In addition, a field survey will be conducted within the area to be graded prior to grading of the area to confirm the location of existing groundwater wells on the portion of the Project site at issue and to identify whether other groundwater wells exist on that portion of the Project site. The final grading plan will be compared to the existing surface elevations at the location of each well and a Groundwater Well Management Plan will be prepared to assure required access to and protection of</p>	

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
		<p>the groundwater monitoring wells. That well plan shall, at a minimum, identify how the grade at each well location is proposed to change; identify how well heads will be protected during construction (e.g., placement of k-rails or other barriers); provide the methodology for extending or shortening well casings, realigning conveyance piping if necessary (for the remediation system), replacing surface completions or wells, as needed; and specify a final survey of finished well locations and elevations. The well plan will be approved by the Department of the Navy (DoN) and the Regional Water Quality Control Board (RWQCB).</p>	
<b>Section 4.8 - Hydrology and Water Quality</b>			
<p><b>Threshold 4.8-1</b> Violate any water quality standards or waste discharge requirements.</p> <p><b>Threshold 4.8-5</b> Otherwise substantially degrade water quality.</p>	<p>With the implementation of the recommended and applicable BMPs and the development requirements included in this section, the Project would not violate any water quality standards and waste discharge requirements nor would it otherwise substantially degrade water quality during construction and operation, pursuant to Thresholds 4.8-1 and 4.8-5. The water quality-related impacts would be less than significant. Additionally, implementation of DR HWQ-6 through DR HWQ-9, which include compliance with the Construction General Permit, preparation of an SWPPP, and General WDRs would ensure impacts to receiving waters from non-storm water flows during construction are less than significant.</p>	<p><b>DR HWQ-6 Water Quality Management Plan.</b> Prior to the issuance of any grading or building permits, the County or its designee shall submit for review and approval by the Manager of Building &amp; Safety, or designee, the Final Water Quality Management Plans (WQMP) specifically identifying Best Management Practices (BMPs) that will be used on site to control predictable pollutant runoff. The County or its designee shall utilize the Orange County Drainage Area Management Plan (DAMP), Model WQMP, and Technical Guidance Manual for reference, and the County's WQMP template for submittal. This WQMP shall include the following:</p> <ul style="list-style-type: none"> <li>• Detailed site and project description.</li> <li>• Potential storm water pollutants.</li> <li>• Post-development drainage characteristics.</li> <li>• Low Impact Development (LID) BMP selection and analysis.</li> <li>• Structural and Non-Structural source-control BMPs.</li> <li>• Site design and drainage plan (BMP Exhibit).</li> <li>• GIS coordinates for all LID and Treatment Control BMPs</li> <li>• Operation and Maintenance (O&amp;M) Plan that (1) describes the long-term operation and maintenance requirements for BMPs identified in the BMP Exhibit; (2) identifies the entity that will be responsible for long-term operation and maintenance of the referenced BMPs; and (3) describes the mechanism for funding the long-term operation and maintenance of the referenced BMPs.</li> </ul> <p>The BMP Exhibit from the approved WQMP shall be included as a sheet in all plan sets submitted for plan check, and all BMPs shall be depicted on these plans. Grading and building plans must be consistent with the approved BMP exhibit.</p> <p><b>DR HWQ-7 Compliance with the National Pollutant Discharge Elimination System (NPDES) Implementation Program.</b> Prior to the issuance of a certificate of use and occupancy, the County or its designee shall demonstrate compliance with the County's NPDES Implementation Program in a manner meeting the satisfaction of the Manager, OC Inspection, including the following:</p> <ul style="list-style-type: none"> <li>• Demonstrate that all structural BMPs described in the BMP Exhibit from the Project's approved WQMP have been implemented, constructed, and installed in conformance with approved plans and specifications;</li> <li>• Demonstrate that the County or its designee has complied with all non-structural BMPs described in the Project's WQMP;</li> </ul>	<p>Less Than Significant</p>

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
		<ul style="list-style-type: none"> <li>• Submit for review and approval an Operations and Maintenance (O&amp;M) Plan for all structural BMPs (the O&amp;M Plan shall become an attachment to the WQMP);</li> <li>• Demonstrate that copies of the Project's approved WQMP (with attached O&amp;M Plan) are available for each of the initial occupants;</li> <li>• Agree to pay for a Special Investigation from the County of Orange for a date 12 months after the issuance of a Certificate of Use and Occupancy for the Project to verify compliance with the approved WQMP and O&amp;M Plan; and</li> <li>• Demonstrate that the County or its designee has recorded one of the following:               <ol style="list-style-type: none"> <li>1. The Covenants, Conditions, and Restrictions (CC&amp;Rs), which includes the approved WQMP and O&amp;M Plan;</li> <li>2. A water quality implementation agreement that has the approved WQMP and O&amp;M Plan attached; or</li> <li>3. The final approved WQMP and O&amp;M Plan.</li> </ol> </li> </ul> <p><b>DR HWQ-8 Storm Water Pollution Prevention Plan.</b> Prior to the issuance of any grading or building permits, the County or its designee shall demonstrate compliance with California's General Permit for Stormwater Discharges Associated with Construction Activity by providing a copy of the Notice of Intent (NOI) submitted to the State Water Resources Control Board and a copy of the subsequent notification of the issuance of a Waste Discharge Identification (WDID) Number or other proof of filing in a manner meeting the satisfaction of the Manager of Building &amp; Safety, or designee. Projects subject to this requirement shall prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). A copy of the current SWPPP shall be kept at the Project site and be available for County review on request.</p> <p><b>DR HWQ-9 Erosion and Sediment Control Plan.</b> Prior to the issuance of any grading or building permit, the County or its designee shall submit an Erosion and Sediment Control Plan (ESCP) in a manner meeting approval of the Manager of Building &amp; Safety, or designee, to demonstrate compliance with the County's NPDES Implementation Program and State water quality regulations for grading and construction activities. The ESCP shall identify how all construction materials, wastes, grading or demolition debris, and stockpiles of soil, aggregates, soil amendments, and other construction materials shall be properly covered, stored, and secured to prevent transport into local drainages or coastal waters by wind, rain, tracking, tidal erosion, or dispersion. The ESCP shall also describe how the County or its designee will ensure that all BMPs will be maintained during construction of any future public rights-of-way. The ESCP shall be updated as needed to address the changing circumstances of the Project site. A copy of the current ESCP shall be kept at the Project site and be available for County review on request.</p>	

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
<p><b>Threshold 4.8-2</b> Substantially alter the existing drainage pattern of the site or area including the alteration of the course of a stream or river, in manner which would result in substantial erosion or siltation on or off-site.</p> <p><b>Threshold 4.8-3</b> Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite.</p> <p><b>Threshold 4.8-4</b> Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.</p>	<p>The Project would not alter the existing drainage pattern of the site or area in a manner that would result in substantial erosion or siltation on or off-site. The proposed improvements were designed to best maintain existing drainage runoff flow patterns, when feasible. However, the Project site topography and the proposed redevelopment for the MCAS El Toro have resulted in two small drainage area diversions for a total of 9.3 acres, which would not have any significant effect on the downstream receiving water bodies (i.e., Marshburn, Bee Canyon, and Agua Chinon Channels). Additionally, the Project would not change the existing drainage pattern of the site in a manner that would increase the rate or amount of runoff resulting in flooding on- or off-site. Also, the Project would not exceed capacity of existing or planned stormwater drainage system or provide substantial additional sources of polluted runoff. Therefore, no significant impacts would occur, with incorporation of the development requirements (DR HWQ-1 through DR HWQ-5) and no mitigation is required, pursuant to Thresholds 4.8-2 through 4.8-4.</p>	<p><b>DR HWQ-1 Drainage Study.</b> Prior to the issuance of any grading permits, the following drainage studies shall be submitted to and approved by the Manager of Building &amp; Safety, or designee:</p> <ul style="list-style-type: none"> <li>A. A drainage study of the Project including diversions, off-site areas that drain onto and/or through the Project, and justification of any diversions;</li> <li>B. When applicable, a drainage study evidencing that proposed drainage patterns will not overload existing storm drains; and</li> <li>C. Detailed drainage studies indicating how the Project grading, in conjunction with the drainage conveyance systems (including applicable swales, channels, street flows, catch basins, storm drains, and flood water retarding) will allow building pads to be safe from inundation from rainfall runoff, which may be expected from all storms up to and including the theoretical 100-year flood.</li> </ul> <p><b>DR HWQ-2 Drainage Facilities.</b> Prior to issuance of grading or building permits, drainage studies that demonstrate the following shall be submitted to and approved by Manager of Building &amp; Safety, or designee:</p> <ul style="list-style-type: none"> <li>1. All surface runoff and subsurface drainage directed to the nearest acceptable drainage facility, as determined by the Manager of Building &amp; Safety, or designee.</li> <li>2. Drainage facilities discharging onto adjacent property shall be designed to imitate the manner in which runoff is currently produced from the site and in a manner meeting the satisfaction of the Manager of Building &amp; Safety, or designee. Alternatively, the County or its designee may obtain a drainage acceptance and maintenance agreement, suitable for recordation, from the owner of said adjacent property. All drainage facilities must be consistent with the County of Orange Grading Ordinance and Local Drainage Manual.</li> </ul> <p><b>DR HWQ-3 Drainage Improvements</b></p> <ul style="list-style-type: none"> <li>A. Prior to the issuance of any grading permits, the County or its designee shall do the following in a manner meeting the approval of the Manager, of Building &amp; Safety, or designee: <ul style="list-style-type: none"> <li>1. Design provisions for surface drainage, and</li> <li>2. Design all necessary storm drain facilities extending to a satisfactory point of disposal for the proper control and disposal of storm runoff.</li> </ul> </li> <li>B. Prior to the approval of final inspection, said improvements shall be constructed, or provide evidence of financial security (such as bonding), in a manner meeting the approval of the Manager, OC Inspection.</li> </ul> <p><b>DR HWQ-4 Easement Subordination.</b> Prior to the final inspection approval, the County or its designee shall not grant any easements over any property subject to a requirement of dedication or irrevocable offer to the Orange County Flood Control District (OCFCD), unless such easements are expressly made subordinate to the easements to be offered for dedication to the County. Prior to granting any of said easements, the County or its designee shall furnish a copy of the proposed easement to the Manager of Building &amp; Safety, or designee for review and</p>	<p>Less Than Significant</p>

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
		<p>approval. Further, a copy of the approved easement shall be furnished to the Manager of Building &amp; Safety, or designee prior to the final inspection approval.</p> <p><b>DR HWQ-5 Diversion of Storm Water Flow.</b> Prior to issuance of any grading permits, the County or its designee shall obtain approval from the OCFCD for any diversion of storm water flow between County watersheds.</p>	
<b>Section 4.9 – Land Use and Planning</b>			
<p><b>Threshold 4.9-1</b> Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.</p>	<p><u>Comparison to Planning Documents</u> For the reasons disclosed above, the Project is not subject to the City of Irvine General Plan and Zoning Ordinance or any implementing requirements of the same and thus those are not applicable plans as defined by the CEQA significance threshold. For purposes of informed decision making, the above compares the Project to City General Plan goals and policies and analyzes whether the Project conflicts.</p> <p>Pursuant to Threshold 4.9-1, Project, is consistent with the goals and strategies of RTP/SCS. As the Project is not included in the OCP-2014 projections, or earlier versions of the same, the Project is not included within the growth projections of regional planning programs like the RTP/SCS. With implementation of MM LU-1, as part of the next updates, the regional planning programs would be modified to reflect the growth associated with the Project and any potential land use planning inconsistency impact would be reduced to less than significant. However, in the interim, until these planning programs are amended, this impact has been identified as a significant, unavoidable impact for regional planning programs as revisions to those programs is not within the jurisdiction or control of the County.</p> <p><u>Compatibility with Existing and Planned Land Uses</u> The Development Plan would introduce mixed-use, multi-family residential, office, retail, and recreation/open space uses that would be compatible with the existing and planned land uses around the site. Additionally, the Project would introduce features, such as the 50-foot “Park within the Park” along Marine Way that would create buffer(s) with adjacent uses. DR LU-1 addresses the obligation regarding modification and/or acquisition of applicable rights from the Second Harvest Food Bank prior to the implementation of these improvements. From a land use compatibility perspective, The proposed commercial uses would not conflict with the warehouse use of the Second Harvest Food Bank warehouse, as the warehouse use is not considered a sensitive use and is compatible with the future commercial uses. Hence, the impacts would be less</p>	<p><b>DR LU-1</b> Prior to the issuance of any grading or building permit for any improvement that directly affects the existing access easement to the Second Harvest Food Bank or requires infrastructure improvements on their parcel, the County shall demonstrate that it has obtained the requisite real property interest. Access will be maintained to the Second Harvest Food Bank parcel at all times, even during construction, and will be able to accommodate access to the delivery areas on the south side of the parcel for large trucks.</p> <p><b>MM LU-1</b> The County shall provide the Project data to the Center for Demographic Research and request inclusion of the Project into the Orange County Projections (OCP) dataset, which will be used for the regional planning programs. This shall occur either through a mid-cycle update or in conjunction with the next scheduled update (anticipated in 2018).</p>	<p><u>Consistency with Applicable Planning Documents</u> Significant and Unavoidable</p> <p><u>Compatibility with Existing and Planned Land Uses</u> Less Than Significant</p>

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
	than significant pursuant to Threshold 4.9-1 as it pertains to consistency with land use plans and no mitigation is required.		
<b>Section 4.10 – Noise</b>			
<p><b>Threshold 4.10-1</b> Result in exposure of persons to or generation of noise levels in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies.</p>	<p>Noise-generating construction activities would be limited to the hours specified in DR NOI-1, and the impact would be less than significant pursuant to Threshold 4.10-1. On-site stationary equipment and noise-generating activities have the potential to exceed the noise level limits. Impacts would be less than significant, pursuant to Threshold 4.10-1, with the implementation of MM NOI-1 and MM NOI-2. Post 2035 traffic noise and train noise could create a potential noise incompatibility with surrounding land uses. MM NOI-3, MM NOI-4, and MM NOI-5 would require Project design to reduce exterior and interior noise levels to the levels specified therein, and to provide disclosure of potential noise to residents of units with balconies. With implementation of MM NOI-3, MM NOI-4, and MM NOI-5, the impact would be less than significant pursuant to Threshold 4.10-1.</p>	<p><b>DR NOI-1</b> Construction activities shall be limited to the hours of 7:00 AM to 7:00 PM, Monday through Friday and 9:00 AM and 6:00 PM on Saturday and will not take place on Sundays or federal holidays.</p> <p><b>MM NOI-1</b> Prior to the issuance of each building permit, the County or designee shall obtain the approval of the Manager of Building &amp; Safety, or designee, for an Acoustical Analysis Report and appropriate plans that demonstrate that the noise levels generated by heating, ventilation, and air conditioning (HVAC), and similar mechanical equipment that can operate continuously at nighttime, would not exceed the nighttime noise limit of 50 dBA for a time period of 30 minutes at the nearest existing or potential future residential receptor as specified in the City of Irvine Noise Ordinance.</p> <p><b>MM NOI-2</b> Prior to the issuance of each building permit, the County or designee shall obtain the approval of the Manager of Building &amp; Safety, or designee, for an Acoustical Analysis Report and appropriate plans that demonstrate that the noise levels generated by loading docks, parking facilities, and other noise-generating activities associated with the proposed uses of the building would not exceed the exterior noise limits at the nearest buildings as specified in the City of Irvine Noise Ordinance.</p> <p><b>MM NOI-3</b> Prior to the issuance of each building permit for a residential building or hotel, the County or designee shall obtain the approval of the Manager of Building &amp; Safety, or designee, of an Acoustical Analysis Report and appropriate plans that demonstrate that the proposed site and architectural design features would provide an interior noise level of 45 A-weighted decibels (dBA) Community Noise Equivalent Level (CNEL) or less (based on buildout traffic and rail noise conditions) in all habitable rooms of the proposed buildings facing Marine Way and the rail line. The County or designee shall also submit building plans and specifications showing that the following occur:</p> <ul style="list-style-type: none"> <li>• All residential units shall be provided with a means of mechanical ventilation, as required by the California Building Code, for occupancy with windows closed.</li> <li>• All exterior use areas shall be located behind the buildings, shielded by a sound wall or other barrier, or at an adequate distance from the noise source to provide exterior noise levels not exceeding 65 dBA CNEL. Exterior use areas are defined in footnote 2 to Table 4.10-4, Irvine Interior and Exterior Noise Standards.</li> </ul> <p><b>MM NOI-4</b> Prior to the issuance of each building permit for a non-residential building, the County or designee shall obtain the approval of the Manager of Building &amp; Safety, or designee, of an acoustical analysis report and appropriate plans that demonstrate that the proposed architectural design would provide an interior average hourly noise level (<math>L_{eq}</math>) during the normal hours of occupancy of 55 dBA or less for commercial, retail, bank, and restaurant uses, and 50 dBA <math>L_{eq}</math> or less for office, professional, and research and development uses.</p> <p><b>MM NOI-5</b> Prior to the issuance of each occupancy permit for a residential building with balconies with forecasted future noise levels exceeding 65 dBA CNEL, the County</p>	<p>Less Than Significant</p>

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
		<p>or designee shall obtain the approval of the Manager of Building &amp; Safety, or designee, of the process that the Project Applicant will use to provide occupancy disclosure notices to all future tenants regarding potential noise impacts that future noise levels at the balconies will exceed 65 dBA CNEL. Disclosure will also be provided to all residents within 500 feet of the 21-acre, potential future location of an OCTA rail maintenance facility.</p>	
<p><b>Threshold 4.10-2</b> Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.</p>	<p>Vibration-generating construction activities could occur within 25 feet of the Second Harvest Food Bank or future on-site buildings. The potential annoyance or structural damage impact would be less than significant through enforcement of MM NOI-6, pursuant to Threshold 4.10-2. Pile-driving operations have the potential to exceed vibration impact thresholds. Impacts would be less than significant, pursuant to Threshold 4.10-2, by implementation of MM NOI-7, which requires the pile driving activities to be designed to limit vibration to less than 0.24 peak particle velocity (ppv) inch per second (in/sec) or less at occupied buildings. Vibration from railroad operations have the potential to exceed vibration annoyance criteria. Impacts would be less than significant, pursuant to Threshold 4.10-2, by implementation of MM NOI-8, which requires building-specific design that rail operation-induced building vibrations would not exceed the vibration impact criteria recommended by the Federal Transit Administration or similar authority for Threshold 4.10-2.</p>	<p><b>MM NOI-6</b> Prior to the issuance of each grading permit, the County or designee shall produce evidence acceptable to the Manager of Building &amp; Safety, or designee demonstrating that the equipment to be used for demolition and grading that would occur within 25 feet of an occupied structure shall not include vibratory rollers, large bulldozers, or similar heavy equipment. Vibratory rollers operated in the static mode would be allowed.</p> <p><b>MM NOI-7</b> Prior to the issuance of each building permit that would include pile driving, the County or designee shall obtain the approval of the Manager of Building &amp; Safety, or designee of a vibration analysis demonstrating that the pile installation has been designed to limit vibrations to 0.24 peak particle velocity (ppv) inch per second (in/sec) or less at occupied buildings.</p> <p><b>MM NOI-8</b> Prior to the issuance of each building permit for buildings where people normally sleep within 200 feet of the railroad tracks south of the Project site, or buildings with primarily daytime use where vibration could interfere with normal activities within 120 feet of the railroad tracks, the County or designee shall obtain the approval of the Manager of Building &amp; Safety, or designee, for a Vibration Analysis Report and appropriate plans that demonstrate that anticipated building vibrations, based on the best available forecast of future rail operations, would not exceed the vibration impact criteria recommended by the Federal Transit Administration or similar authority acceptable to the Manager of Building &amp; Safety, or designee. The FTA-recommended criterion for vibration annoyance, at buildings where people normally sleep is 72 VdB. The vibration criterion for buildings with primarily daytime use is 75 VdB. The vibration analysis shall describe whether an increased setback or vibration-reducing structural building elements are required to achieve the performance standard.</p>	<p>Less Than Significant</p>
<p><b>Threshold 4.10-3</b> Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.</p>	<p>Project-generated traffic noise increases at sensitive receptors would be significant on two roadway segments with the Existing Plus Project scenario. However, this scenario is a hypothetical condition that would not practically occur. Under the remaining scenarios (2017, 2035, and post-2035) traffic noise increases at sensitive receptors would be less than significant pursuant to Threshold 4.10-3. With the implementation of MM NOI-1 and MM NOI-2, permanent ambient noise increases in the vicinity of the Project site generated by on-Project site sources would be less than significant pursuant to Threshold 4.10-3.</p>	<p>Refer to <b>MMs NOI-1</b> and <b>NOI-2</b> above.</p>	<p>Less Than Significant</p>

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
<p><b>Threshold 4.10-4</b> Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.</p>	<p>There would be a temporary increase in ambient noise levels in the Project vicinity due to Project construction. With distance and intervening buildings and traffic noise, Project construction noise would not be heard at off-site sensitive receptors. New residents of the Project would hear some of the ongoing construction noise. However, the noise increase would be less than significant because of noise reduction that would occur over the distance between the source and receptor. Temporary increases in ambient noise levels due to Project construction would not be substantial and would be less than significant pursuant to Threshold 4.10-4.</p>	<p>Refer to <b>DR NOI-1</b> above.</p> <p><b>DR NOI-2</b> Prior to the issuance of any grading permits, the County or designee shall produce evidence acceptable to the Manager of Building &amp; Safety, or designee, that:</p> <ol style="list-style-type: none"> <li>1. All construction vehicles or equipment, fixed or mobile, operated within 1,000 feet of an occupied dwelling unit, shall be equipped with properly operating and maintained mufflers.</li> <li>2. Stockpiling and/or vehicle staging areas shall be located as far as practicable from dwellings.</li> </ol> <p>Notations in the above format, appropriately numbered and included with other notations on the front sheet of the Project's permitted grading plans, will be considered as adequate evidence of compliance with this condition.</p>	<p>Less Than Significant</p>
<p><b>Section 4.11 - Population and Housing</b></p>			
<p><b>Threshold 4.11-1</b> Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).</p>	<p>The Project proposes new dwelling units and mixed-use development, which would generate approximately 3,954 new residents and approximately 7,779 new jobs in the City. Because this growth has not been incorporated into the long-range planning programs. The Project would have a direct growth-inducing impact. However, due to the infill nature of the Project a substantial indirect growth-inducing impact related to the Project is not anticipated. The direct growth-inducing effects would be considered a significant impact, pursuant to Threshold 4.11-1.</p>	<p>No mitigations would eliminate or reduce the direct population growth impact associated with the Project.</p>	<p>Significant and Unavoidable</p>
<p><b>Section 4.12 - Public Services</b></p>			
<p><b>Threshold 4.12-1(i)</b> Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:</p> <p>(i) Fire protection.</p>	<p>The Project would create the typical range of service calls for residential, commercial, office, and hotel developments, including structural fires; emergency medical and rescue services; and hazardous materials inspections and response. With the incorporation of DR FIRE-1 through DR FIRE-4, Project impacts on fire protection services would be less than significant pursuant to Threshold 4.12-1 (i). No new or physically altered fire facilities that would result in substantial adverse physical impacts would be required as a result of the Project.</p>	<p><b>DR FIRE-1 Fire Alarm and Monitoring Systems.</b> Prior to the issuance of a building permit which requires the installation of any fire alarm system, the County or its designee shall provide the Manager of Building &amp; Safety, or designee, with a clearance from the Orange County Fire Authority (OCFA) indicating compliance with Guideline D-03 (New and Existing Fire Alarm &amp; Signaling Systems). The fire alarm system shall be operational prior to the final inspection approval.</p> <p><b>DR FIRE-2</b></p> <ol style="list-style-type: none"> <li>A. <b>Fire Master Plan.</b> Prior to the issuance of a grading permit, the County or its designee must provide the Manager of Building &amp; Safety, or designee, with proof from the OCFA indicating that a Fire Master Plan has been prepared that complies with Chapter 5 of the Fire Code and Guideline B-09 (Fire Master Plans for Commercial &amp; Residential Development).</li> <li>B. <b>Site Access.</b> Prior to the issuance of any grading permit (with the exception of initial mass grading of a large-scale project), the County or its designee shall provide the Manager of Building &amp; Safety, or designee, with proof from the OCFA indicating that a Fire Master Plan has been prepared that complies with Guideline B-09 (Fire Master Plans for Commercial &amp; Residential Development), including identification of access to and in the project area. *Note-refer to the OCFA website to obtain a copy of Guideline B-09 for information regarding the submittal requirements.</li> <li>C. <b>Lumber Drop.</b> Prior to the issuance of a building permit, the County or its designee must provide the Manager of Building &amp; Safety, or designee, with</li> </ol>	<p>Less Than Significant</p>

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
		<p>proof from OCFA allowing the introduction of combustible materials into the Project area.</p> <p><b>DR FIRE-3 Automatic Fire Sprinkler Systems</b></p> <p>A. Prior to the issuance of a building permit, the County or its designee shall provide the Manager of Building &amp; Safety, or designee, with a copy of the OCFA approved Fire Master Plan or site plan indicating that an approved automatic fire sprinkler system will be provided.</p> <p>B. Prior to the final inspection approval, the automatic fire sprinkler system shall be operational in a manner meeting the approval of the Fire Chief.</p> <p><b>DR FIRE-4 Traffic Signal Preemption Devices.</b> Prior to the acceptance of public street improvements requiring installation of a traffic signal, if determined necessary by the Fire Code Official, the County or its designee shall install traffic signal preemption equipment for the surrounding signalized intersections. The clearance of this condition shall be by the Manager of Building &amp; Safety, or designee, based on evidence that an agreement is in place or that the traffic signal preemption equipment has been installed.</p> <p><b>DR FIRE-5 Secured Fire Protection Agreement.</b> Prior to approval of any building permits for the Project, the County or its designee shall enter into a Secured Fire Protection Agreement with the OCFA.</p>	
<p><b>Threshold 4.12-1(ii)</b> Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:</p> <p>(ii) Police protection.</p>	<p>The Project would increase the demand for police protection services, increasing demand by approximately 4 sworn officers, 1.4 non-sworn full-time professional staff and 1 non-sworn part-time staff member. However, the increase of sworn and non-sworn staff members would not require new or physically altered governmental facilities. Compliance with DR FIRE-4, would further ensure that adequate police protection response times are provided. This impact is considered less than significant pursuant to Threshold 4.12-1 (ii).</p>	<p>Refer to <b>DR FIRE-4</b> above.</p>	<p>Less Than Significant</p>
<p><b>Threshold 4.12-1(iii)</b> Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:</p> <p>(iii) Schools.</p>	<p>The Proposed Project would generate approximately 189 students in the SVUSD. The SVUSD has existing capacity in schools that would serve the Project. The Project would also be required to comply with the California Government Code (payment of State-mandated school fees). Additionally, the development would be required to pay the Measure B General Obligation bond taxes. Therefore, with these measures, impacts to schools would be less than significant pursuant to Threshold 4.12-1 (iii). The provision of new or physically altered school facilities would not be required.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
<p><b>Threshold 4.12-1(iv)</b> Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:</p> <p>(iv) Other Public Facilities.</p>	<p>With an increase of approximately 3,954 residents, the Project would result in additional demand on the OCPL. However, the County has not established a service standard and no such standard has been set forth by the American Library Association. Library services have changed in the last five years and, according to the OCPL, the focus is on incorporating electronic materials (e-materials) and not on volumes in the traditional sense. The OCPL has no plans for the construction of new facilities. Therefore, the Project would not, in and of itself, trigger the construction of new or expanded library facilities, and the impact is less than significant pursuant to Threshold 4.12-1 (v).</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>
<p><b>Section 4.13 – Recreation</b></p>			
<p><b>Threshold 4.13-1</b> 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.</p>	<p>The proposed Project would increase demand for recreational facilities and amenities by introducing increased population in the area. However, the Project has committed to providing a minimum of 2.5 acres of parkland per 1,000 residents (DR REC-1). This would be accomplished through the provision of active and passive parks and recreational facilities. Though the residents of the Project would reasonably avail themselves of larger recreational facilities in the County, including the OCGP, regional parks, and beaches, the anticipated increase in usage would not be substantial in light of the regional design of these recreational amenities nor would it accelerate substantial physical deterioration of these facilities. Therefore, the potential impacts to recreation would be less than significant, pursuant to Threshold 4.13-1.</p>	<p><b>DR REC-1</b> Prior to the issuance of a Certificate of Occupancy for any residential dwelling unit, the County or designee shall grade and improve common open space areas at a minimum ratio of 2.5 acres of parkland per 1,000 residents through provision of an open space system on site. The common open spaces areas that satisfy this requirement shall comply with Section 3.3.1, Common Open Space or Table 4.3, Development Standards of the Development Plan, as applicable.</p>	<p>Less Than Significant</p>
<p><b>Threshold 4.13-2</b> Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.</p>	<p>The proposed Project would include recreational facilities and amenities through a system of parks and open space in the development. These facilities would meet the needs of the future residents and users of the development and any adverse physical effects associated with implementation of these improvements are addressed elsewhere in this EIR. Given the availability of on-site recreational facilities, the Project would not require the construction or expansion of other recreational facilities that might have any adverse physical effects on the environment. No additional recreation facilities, beyond those associated with the Project, are proposed that would adversely impact the environment. Therefore, the potential impact to recreation would be less than significant, pursuant to Threshold 4.13-2.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
<b>Section 4.14 - Transportation/Traffic<sup>3</sup></b>			
<p><i>City of Irvine</i></p> <p><b>Threshold 4.14-1</b> In the City of Irvine outside of the Irvine Planning Area, Irvine Business Complex (IBC), the Bake Parkway/I-5 ramp, the Alton Parkway/Irvine Boulevard intersection, the Bake Parkway/Irvine Boulevard intersection, the Lake Forest/I-5 SB Ramp, and the Lake Forest/Irvine Center Drive, the addition of Project-generated trips increases the ICU at a study intersection by 0.02 or more of capacity, causing the intersection to change from an acceptable LOS D to LOS E or LOS F.</p> <p><b>Threshold 4.14-2</b> In the City of Irvine not addressed by Threshold 4.14-1, the addition of Project-generated trips increases the ICU at a study intersection by 0.02 or more of capacity, causing the intersection to change from an acceptable LOS E to LOS F.</p> <p><b>Threshold 4.14-3</b> In the City of Irvine outside of the Irvine Planning Area, Irvine Business Complex (IBC), the Bake Parkway/I-5 ramp, the Alton Parkway/Irvine Boulevard intersection, the Bake Parkway/Irvine Boulevard intersection, the Lake Forest/I-5 SB Ramp, and the Lake Forest/Irvine Center Drive, the addition of Project-generated trips increases the ICU by 0.02 or more at a study intersection operating at LOS E or F under baseline conditions.</p> <p><b>Threshold 4.14-4</b> In the City of Irvine outside of those identified by Threshold 4.14-3, the addition of Project-generated trips increases the ICU by 0.02 or more at a study intersection operating at LOS F under baseline conditions.</p> <p><b>Threshold 4.14-5</b> In the City of Irvine outside of PA33 (Irvine Spectrum Area) and PA36 (IBC), the addition of Project-generated trips increases the V/C ratio on a roadway segment by more than 0.02 on a roadway segment, causing the roadway segment to change from an acceptable LOS D or better to LOS E or F.</p> <p><b>Threshold 4.14-6</b> In the City of Irvine in PA33 (Irvine Spectrum Area) and PA36 (IBC), the addition of Project-generated trips increases the V/C ratio on a roadway segment by more than 0.02 on a roadway segment, causing the roadway segment to change from an acceptable LOS E or better to LOS F.</p> <p><b>Threshold 4.14-7</b> In the City of Irvine outside of PA33 (Irvine Spectrum Area) and PA36 (IBC), the addition of Project-generated trips increases the V/C ratio on a roadway segment by more than 0.02 on a roadway segment operating at LOS E or F.</p> <p><b>Threshold 4.14-8</b> In the City of Irvine in PA33 (Irvine Spectrum Area) and PA36 (IBC), the addition of Project-generated trips increases the V/C ratio on a roadway segment by more than 0.02 on a roadway segment operating at LOS F.</p>	<p>Based on the traffic data analysis and the threshold evaluations above, the proposed Project would not result in significant impacts pursuant to City of Irvine thresholds of significance (Thresholds 4.14-1 through 4.14-10) in the Existing Plus Project and 2017 Plus Project scenarios.</p> <p>Significant impacts would occur in Year 2035 Plus Project and Post-2035 Plus Project scenarios pursuant to Thresholds 4.14-1 through 4.14-3 and 4.14-9, and 4.14-10. While potential mitigation has been recommended and imposed that would reduce impacts to less than significant for the impacts pursuant to Thresholds 4.14-1 through 4.14-3, the feasibility of the mitigation is uncertain and outside the control of the County of Orange; therefore, the impacts would remain significant and unavoidable. Impacts associated with the freeway mainline and ramps (Thresholds 4.14-9 and 4.14-10) would be significant and unavoidable (see Section 4.14.8, Mitigation Program for a discussion of the mitigation approach.).</p>	<p><b>DR TRAN-3</b> Prior to the issuance of any building permits, the County or its designee shall deliver an irrevocable offer to dedicate a traffic signal maintenance easement to the applicable jurisdiction at the applicable Project site access points and Marine Way in a manner meeting the approval of the Manager of Building &amp; Safety, or designee.</p> <p><b>MM TRAN-3</b> Prior to the issuance of any building permits, the County shall conduct a fee reallocation study to establish the Project's fair share traffic mitigation fees to be paid to the NITM Program, toward improvements identified in the List of NITM Improvements. County shall pay, or cause its designee to pay, its fair share traffic mitigation fees toward the improvements identified in the List of NITM Improvements, pursuant to this fee reallocation study. The fair share shall be calculated based on the final Project entitlements.</p> <p>The direct and cumulative impacts associated with the Project are identified in the Table 4 (provided at the end of this MMRP). For locations where improvements other than those programmed by NITM are required, the County shall be responsible as follows:</p> <ul style="list-style-type: none"> <li>• For those locations where improvements, are required due to direct Project impacts, the County shall negotiate a formal agreement with the City of Irvine, to pay to the City of Irvine the cost of those additional improvements.</li> <li>• For those locations where a cumulative impact has been identified, the County shall negotiate an agreement to pay a fair share of the costs to mitigate the cumulative impact, per typical City protocols for identifying the share.</li> <li>• For improvements to Caltrans facilities not specifically identified on the List of NITM Improvements, the County shall be responsible for entering into a Traffic Mitigation Agreement (Agreement) with Caltrans pursuant to the Local Development-Intergovernmental Review Program (MM TRAN-4) to provide for a fair share payment by the Project toward the applicable improvement. Though a location may be covered by both NITM and the Agreement with Caltrans (i.e., those locations with shared jurisdiction), redundant improvements shall not be included in both NITM and the Caltrans Agreement.</li> </ul>	<p><u>Existing Plus Project Scenarios</u> Less Than Significant</p> <p><u>2017 Plus Project Scenarios</u> Less Than Significant</p> <p><u>2035 Plus Project Scenarios</u> Significant and Unavoidable</p> <p><u>Post-2035</u> Significant and Unavoidable</p>

<sup>3</sup> The Draft Program EIR identified two mitigation measures (MM TRAN-1 [City of Irvine signals] and MM TRAN-2 [Caltrans signals]), which pertained to optimization of the signal timing. Based on the committed improvements identified through the Project's mitigation program, these actions are not required. Signal timing is considered part of the general signal maintenance; therefore, the City of Irvine or Caltrans would optimize signal timing as deemed necessary by the agency with jurisdiction.

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
<p><b>Threshold 4.14-9</b> In the City of Irvine, the addition of Project-generated trips increases the V/C ratio on a freeway ramp to increase by more than 0.02, causing the freeway ramp segment to change from an acceptable LOS E or better to LOS F.</p> <p><b>Threshold 4.14-10</b> In the City of Irvine, the addition of Project-generated trips increases the V/C ratio on a freeway ramp to increase by more than 0.02, on a freeway ramp segment operating at LOS F.</p>			
<p><b>City of Tustin</b></p> <p><b>Threshold 4.14-11</b> In the City of Tustin, the addition of Project-generated trips increases the ICU at a study intersection by 0.02 or more of capacity, causing the intersection to change from an acceptable LOS D to LOS E or LOS F.</p> <p><b>Threshold 4.14-12</b> In the City of Tustin, the addition of Project-generated trips increases the ICU by 0.02 or more at a study intersection operating at LOS E or F under baseline conditions.</p> <p><b>Threshold 4.14-13</b> In the City of Tustin, the addition of Project-generated trips increases the V/C ratio on a roadway segment by more than 0.02 on a roadway segment, causing the roadway segment to change from an acceptable LOS D or better to LOS E or F.</p> <p><b>Threshold 4.14-14</b> In the City of Tustin, the addition of Project-generated trips increases the V/C ratio on a roadway segment by more than 0.02 on a roadway segment operating at LOS E or F.</p> <p><b>Threshold 4.14-15</b> In the City of Tustin, the addition of Project-generated trips increases the V/C ratio on a freeway ramp to increase by more than 0.02, causing the freeway ramp segment to change from an acceptable LOS E or better to LOS F.</p> <p><b>Threshold 4.14-16</b> In the City of Tustin, the addition of Project-generated trips increases the V/C ratio on a freeway ramp to increase by more than 0.02, on a freeway ramp segment operating at LOS F.</p>	<p>Based on the traffic data analysis and the threshold evaluations above, the proposed Project would not result in significant impacts pursuant to City of Tustin thresholds of significance (Thresholds 4.14-11 through 4.14-16) in the Existing Plus Project, 2017 Plus Project, Year 2035 Plus Project, and Post-2035 Plus Project scenarios. No mitigation is required.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>
<p><b>City of Laguna Beach</b></p> <p><b>Threshold 4.14-17</b> In the City of Laguna Beach, the addition of Project-generated trips increases the ICU at a study intersection by 0.02 or more of capacity, causing the intersection to change from an acceptable LOS D to LOS E or LOS F.</p> <p><b>Threshold 4.14-18</b> In the City of Laguna Beach, the addition of Project-generated trips increases the ICU by 0.02 or more at a study intersection operating at LOS E or F under baseline conditions.</p> <p><b>Threshold 4.14-19</b> In the City of Laguna Beach, the addition of Project-generated trips increases the V/C ratio on a roadway segment by more than 0.02 on a roadway segment, causing the roadway segment to change from an acceptable LOS D or better to LOS E or F.</p>	<p>Based on the traffic data analysis and the threshold evaluations above, the proposed Project would not result in significant impacts pursuant to City of Laguna Beach thresholds of significance (Thresholds 4.14-17 through 4.14-22) in the Existing Plus Project, 2017 Plus Project, Year 2035 Plus Project, and Post-2035 Plus Project scenarios. No mitigation is required.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
<p><b>Threshold 4.14-20</b> In the City of Laguna Beach, the addition of Project-generated trips increases the V/C ratio on a roadway segment by more than 0.02 on a roadway segment operating at LOS E or F.</p> <p><b>Threshold 4.14-21</b> In the City of Laguna Beach, the addition of Project-generated trips increases the V/C ratio on a freeway ramp to increase by more than 0.02, causing the freeway ramp segment to change from an acceptable LOS E or better to LOS F.</p> <p><b>Threshold 4.14-22</b> In the City of Laguna Beach, the addition of Project-generated trips increases the V/C ratio on a freeway ramp to increase by more than 0.02, on a freeway ramp segment operating at LOS F.</p>			
<p><b>City of Lake Forest</b></p> <p><b>Threshold 4.14-23</b> In the City of Lake Forest, the addition of Project-generated trips increases the ICU at a study intersection by 0.02 or more of capacity, causing the intersection to change from an acceptable LOS D to LOS E or LOS F.</p> <p><b>Threshold 4.14-24</b> In the City of Lake Forest, the addition of Project-generated trips increases the ICU by 0.02 or more at a study intersection operating at LOS E or F under baseline conditions.</p> <p><b>Threshold 4.14-25</b> In the City of Lake Forest, the addition of Project generated trips increases the V/C ratio on a roadway segment by more than 0.02 on a roadway segment, causing the roadway segment to change from an acceptable LOS D or better to LOS E or F.</p> <p><b>Threshold 4.14-26</b> In the City of Lake Forest, the addition of Project generated trips increases the V/C ratio on a roadway segment by more than 0.02 on a roadway segment operating at LOS E or F.</p> <p><b>Threshold 4.14-27</b> In the City of Lake Forest, the addition of Project generated trips increases the V/C ratio on a freeway ramp to increase by more than 0.02, causing the freeway ramp segment to change from an acceptable LOS E or better to LOS F.</p> <p><b>Threshold 4.14-28</b> In the City of Lake Forest, the addition of Project generated trips increases the V/C ratio on a freeway ramp to increase by more than 0.02, on a freeway ramp segment operating at LOS F.</p>	<p>Based on the traffic data analysis and the threshold evaluations above, the proposed Project would not result in significant impacts pursuant to City of Lake Forest thresholds of significance (Thresholds 4.14-23 through 4.14-28) in the Existing Plus Project, 2017 Plus Project, Year 2035 Plus Project, and Post-2035 Plus Project scenarios. No mitigation is required.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
<p><b>City of Laguna Hills</b></p> <p><b>Threshold 4.14-29</b> In the City of Laguna Hills, the addition of Project-generated trips increases the ICU at a study intersection by 0.02 or more of capacity, causing the intersection to change from an acceptable LOS D to LOS E or LOS F.</p> <p><b>Threshold 4.14-30</b> In the City of Laguna Hills, the addition of Project-generated trips increases the ICU by 0.02 or more at a study intersection operating at LOS E or F under baseline conditions.</p> <p><b>Threshold 4.14-31</b> In the City of Laguna Hills, the addition of Project generated trips increases the V/C ratio on a roadway segment by more than 0.02 on a roadway segment, causing the roadway segment to change from an acceptable LOS D or better to LOS E or F.</p> <p><b>Threshold 4.14-32</b> In the City of Laguna Hills, the addition of Project generated trips increases the V/C ratio on a roadway segment by more than 0.02 on a roadway segment operating at LOS E or F.</p> <p><b>Threshold 4.14-33</b> In the City of Laguna Hills, the addition of Project generated trips increases the V/C ratio on a freeway ramp to increase by more than 0.02, causing the freeway ramp segment to change from an acceptable LOS E or better to LOS F.</p> <p><b>Threshold 4.14-34</b> In the City of Laguna Hills, the addition of Project generated trips increases the V/C ratio on a freeway ramp to increase by more than 0.02, on a freeway ramp segment operating at LOS F.</p>	<p>Based on the traffic data analysis and the threshold evaluations above, the proposed Project would not result in significant impacts pursuant to City of Laguna Hills thresholds of significance (Thresholds 4.14-29 through 4.14-34) in the Existing Plus Project, 2017 Plus Project, Year 2035 Plus Project, and Post-2035 Plus Project scenarios. No mitigation is required.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>
<p><b>City of Laguna Woods</b></p> <p><b>Threshold 4.14-35</b> In the City of Laguna Woods, the addition of Project-generated trips increases the ICU at a study intersection by 0.02 or more of capacity, causing the intersection to change from an acceptable LOS D to LOS E or LOS F.</p> <p><b>Threshold 4.14-36</b> In the City of Laguna Woods, the addition of Project-generated trips increases the ICU by 0.02 or more at a study intersection operating at LOS E or F under baseline conditions.</p> <p><b>Threshold 4.14-37</b> In the City of Laguna Woods, the addition of Project generated trips increases the V/C ratio on a roadway segment by more than 0.02 on a roadway segment, causing the roadway segment to change from an acceptable LOS D or better to LOS E or F.</p> <p><b>Threshold 4.14-38</b> In the City of Laguna Woods, the addition of Project generated trips increases the V/C ratio on a roadway segment by more than 0.02 on a roadway segment operating at LOS E or F.</p> <p><b>Threshold 4.14-39</b> In the City of Laguna Woods, the addition of Project generated trips increases the V/C ratio on a freeway ramp to increase by more than 0.02, causing the freeway ramp segment to change from an acceptable LOS E or better to LOS F.</p>	<p>Based on the traffic data analysis and the threshold evaluations above, the proposed Project would not result in significant impacts pursuant to City of Laguna Woods thresholds of significance (Thresholds 4.14-35 through 4.14-40) in the Existing Plus Project, 2017 Plus Project, Year 2035 Plus Project and Post-2035 Plus Project scenarios. No mitigation is required.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
<p><b>Threshold 4.14-40</b> In the City of Laguna Woods, the addition of Project generated trips increases the V/C ratio on a freeway ramp to increase by more than 0.02, on a freeway ramp segment operating at LOS F.</p>			
<p><b>City of Aliso Viejo</b></p> <p><b>Threshold 4.14-41</b> In the City of Aliso Viejo, the addition of Project-generated trips increases the ICU at a study intersection by 0.02 or more of capacity, causing the intersection to change from an acceptable LOS D to LOS E or LOS F.</p> <p><b>Threshold 4.14-42</b> In the City of Aliso Viejo, the addition of Project-generated trips increases the ICU by 0.02 or more at a study intersection operating at LOS E or F under baseline conditions.</p> <p><b>Threshold 4.14-43</b> In the City of Aliso Viejo, the addition of Project generated trips increases the V/C ratio on a roadway segment by more than 0.02 on a roadway segment, causing the roadway segment to change from an acceptable LOS D or better to LOS E or F.</p> <p><b>Threshold 4.14-44</b> In the City of Aliso Viejo, the addition of Project generated trips increases the V/C ratio on a roadway segment by more than 0.02 on a roadway segment operating at LOS E or F.</p> <p><b>Threshold 4.14-45</b> In the City of Aliso Viejo, the addition of Project generated trips increases the V/C ratio on a freeway ramp to increase by more than 0.02, causing the freeway ramp segment to change from an acceptable LOS E or better to LOS F.</p> <p><b>Threshold 4.14-46</b> In the City of Aliso Viejo, the addition of Project generated trips increases the V/C ratio on a freeway ramp to increase by more than 0.02, on a freeway ramp segment operating at LOS F.</p>	<p>Based on the traffic data analysis and the threshold evaluations above, the proposed Project would not result in significant impacts pursuant to City of Aliso Viejo thresholds of significance (Thresholds 4.14-41 through 4.14-46) in the Existing Plus Project, 2017 Plus Project, Year 2035 Plus Project, and Post-2035 Plus Project scenarios. No mitigation is required.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>
<p><b>City of Mission Viejo</b></p> <p><b>Threshold 4.14-47</b> In the City of Mission Viejo, the addition of Project-generated trips increases the ICU at a study intersection by 0.02 or more of capacity, causing the intersection to change from an acceptable LOS D to LOS E or LOS F.</p> <p><b>Threshold 4.14-48</b> In the City of Mission Viejo, the addition of Project-generated trips increases the ICU by 0.02 or more at a study intersection operating at LOS E or F under baseline conditions.</p> <p><b>Threshold 4.14-49</b> In the City of Mission Viejo, the addition of Project generated trips increases the V/C ratio on a roadway segment by more than 0.02 on a roadway segment, causing the roadway segment to change from an acceptable LOS D or better to LOS E or F.</p>	<p>Based on the traffic data analysis and the threshold evaluations above, the proposed Project would not result in significant impacts pursuant to City of Mission Viejo thresholds of significance (Thresholds 4.14-47 through 4.14 52) in the Existing Plus Project, 2017 Plus Project, Year 2035 Plus Project and Post-2035 Plus Project scenarios. No mitigation is required.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
<p><b>Threshold 4.14-50</b> In the City of Mission Viejo, the addition of Project generated trips increases the V/C ratio on a roadway segment by more than 0.02 on a roadway segment operating at LOS E or F.</p> <p><b>Threshold 4.14-51</b> In the City of Mission Viejo, the addition of Project generated trips increases the V/C ratio on a freeway ramp to increase by more than 0.02, causing the freeway ramp segment to change from an acceptable LOS E or better to LOS F.</p> <p><b>Threshold 4.14-52</b> In the City of Mission Viejo, the addition of Project generated trips increases the V/C ratio on a freeway ramp to increase by more than 0.02, on a freeway ramp segment operating at LOS F.</p>			
<p><b>City of Orange</b></p> <p><b>Threshold 4.14-53</b> In the City of Orange, the addition of Project-generated trips increases the ICU at a study intersection by 0.02 or more of capacity, causing the intersection to change from an acceptable LOS D to LOS E or LOS F.</p> <p><b>Threshold 4.14-54</b> In the City of Orange, the addition of Project-generated trips increases the ICU by 0.02 or more at a study intersection operating at LOS E or F under baseline conditions.</p> <p><b>Threshold 4.14-55</b> In the City of Orange, the addition of Project generated trips increases the V/C ratio on a roadway segment by more than 0.02 on a roadway segment, causing the roadway segment to change from an acceptable LOS D or better to LOS E or F.</p> <p><b>Threshold 4.14-56</b> In the City of Orange, the addition of Project generated trips increases the V/C ratio on a roadway segment by more than 0.02 on a roadway segment operating at LOS E or F.</p> <p><b>Threshold 4.14-57</b> In the City of Orange, the addition of Project generated trips increases the V/C ratio on a freeway ramp to increase by more than 0.02, causing the freeway ramp segment to change from an acceptable LOS E or better to LOS F.</p> <p><b>Threshold 4.14-58</b> In the City of Orange, the addition of Project generated trips increases the V/C ratio on a freeway ramp to increase by more than 0.02, on a freeway ramp segment operating at LOS F.</p>	<p>Based on the traffic data analysis and the threshold evaluations above, the proposed Project would not result in significant impacts pursuant to City of Orange thresholds of significance (Thresholds 4.14-53 through 4.14-58) in the Existing Plus Project, 2017 Plus Project, Year 2035 Plus Project, and Post-2035 Plus Project scenarios. No mitigation is required.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>
<p><b>County of Orange</b></p> <p><b>Threshold 4.14-59</b> In the County of Orange, the addition of Project-generated trips increases the ICU at a study intersection by 0.01 or more of capacity, causing the intersection to change from an acceptable LOS D to LOS E or LOS F.</p>	<p>Based on the traffic data analysis and the threshold evaluations above, the proposed Project would not result in significant impacts pursuant to County of Orange thresholds of significance (Thresholds 4.14-59 through 4.14-64) in the Existing Plus Project, 2017 Plus Project, Year 2035 Plus Project, and Post-2035 Plus Project scenarios. No mitigation is required.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
<p><b>Threshold 4.14-60</b> In the County of Orange, the addition of Project-generated trips increases the ICU by 0.01 or more at a study intersection operating at LOS E or F under baseline conditions.</p> <p><b>Threshold 4.14-61</b> In the County of Orange, the addition of Project generated trips increases the V/C ratio on a roadway segment by more than 0.01 on a roadway segment, causing the roadway segment to change from an acceptable LOS D or better to LOS E or F.</p> <p><b>Threshold 4.14-62</b> In the County of Orange, the addition of Project generated trips increases the V/C ratio on a roadway segment by more than 0.01 on a roadway segment operating at LOS E or F.</p> <p><b>Threshold 4.14-63</b> In the County of Orange, the addition of Project generated trips increases the V/C ratio on a freeway ramp to increase by more than 0.01, causing the freeway ramp segment to change from an acceptable LOS E or better to LOS F.</p> <p><b>Threshold 4.14-64</b> In the County of Orange, the addition of Project generated trips increases the V/C ratio on a freeway ramp to increase by more than 0.01, on a freeway ramp segment operating at LOS F.</p>			
<p><b>Caltrans (Intersections)</b></p> <p><b>Threshold 4.14-65</b> The addition of Project-generated trips causes the LOS at a study intersection to degrade from LOS A, B, C to D, E, or F (as measured by the application of the HCM methodologies).</p> <p><b>Threshold 4.14-66</b> The addition of Project-generated trips causes any increase in delay at a study intersection (as measured by the application of HCM methodologies), where the intersection operates at LOS D, E or LOS F prior to the addition of project traffic.</p> <p><b>Caltrans (Mainline Freeway Facilities)</b></p> <p><b>Threshold 4.14-67</b> The addition of Project-generated trips increases the traffic on a freeway mainline by more than 0.03, and causes the LOS to degrade from LOS A, B, C, D, E, to F.</p> <p><b>Threshold 4.14-68</b> The addition of Project-generated trips increases the traffic on a freeway mainline by more than 0.03, on a facility operating at LOS F prior to the addition of project traffic.</p>	<p>Based on the traffic data analysis and the threshold evaluations above, the proposed Project would result in significant impacts at intersections with shared jurisdictions with the City of Irvine and Caltrans. For these locations, the City of Irvine thresholds of significance have been applied (Thresholds 4.14-9 and 4.14-10). See discussion above.</p>	<p><b>DR TRAN-1</b> Prior to issuance of building permits, the County or its designee shall pay applicable fees for the Major Thoroughfare and Bridge Fee Program (i.e., Foothill/Eastern Transportation Corridor Zone A) in a manner meeting the approval of the Manager of Building &amp; Safety, or designee.</p> <p><b>MM TRAN-4</b> The County of Orange or its designee shall enter into a mutually acceptable Traffic Mitigation Agreement (Agreement) with Caltrans, to provide for payment of the Project's fair-share of the improvements required to mitigate the Project's impacts to Caltrans facilities as disclosed in Table 4.14-35 of the Draft Program EIR, as revised. The Agreement shall be entered into pursuant to the Caltrans Local Development-Intergovernmental Review Program, prior to the issuance of occupancy permits for the improvements that would have potentially significant impacts on the identified Caltrans facilities. The responsibilities covered by this agreement may extend beyond those facilities covered in the NITM program.</p> <p>The NITM Program also provides for improvements on some Caltrans facilities. Therefore, <b>MM TRAN-3</b>, identified above, will also be applicable at the appropriate locations.</p>	<p>Significant and Unavoidable</p>
<p><b>Orange County Transportation Authority Congestion Management Program</b></p> <p><b>Threshold 4.14-69</b> The addition of Project-generated trips causes the LOS at a study intersection in the Orange County Transportation Authority Congestion Management Program to change from an acceptable LOS E to LOS F.</p>	<p>Pursuant to Thresholds 4.14-69 through 4.14-71, Project-generated trips would not cause the LOS at a study intersection under the jurisdiction of OCTA CMP to change from an acceptable LOS E to LOS F. Additionally proposed Project-generated trips would not increase the ICU by 0.03 or more at a CMP study intersection operating at LOS F under baseline conditions. The proposed Project would not conflict</p>	<p>No mitigation is required.</p>	<p>No Impact</p>

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
<p><b>Threshold 4.14-70</b> The addition of Project-generated trips increases the ICU by 0.03 or more at a study intersection operating at LOS F under baseline conditions.</p> <p><b>Threshold 4.14-71</b> Would the Project conflict with an applicable congestion management program, including, but not limited to level of service standard and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?</p>	<p>with applicable CMP standards. No impacts would occur, and no mitigation is required.</p>		
<p><b>General CEQA thresholds</b></p> <p><b>Threshold 4.14-72</b> The Project will not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).</p>	<p>With implementation of DR TRAN-4 and DR TRAN-5, which requires compliance with applicable City or County requirements, Project-generated traffic would not substantially increase hazards due to a design feature including, without limitations, connections with external roadways. Compliance with the Circulation Design Guidelines in the Development Plan (e.g., safety enhancing features and speed reduction mechanisms) would also avoid any potentially significant impacts. Further, based on the nature of the uses and the design of the Project, the Project would not substantially increase hazards due to incompatible uses. Therefore, the Project would have a less than significant impact as it relates to Threshold 4.14-72 and no mitigation is required.</p>	<p><b>DR TRAN-4</b> Prior to the issuance of any grading permits, the County or its designee shall provide adequate sight distance per Standard Plan 1117 at all street intersections which are internal to the Project, in a manner meeting the approval of the Manager of Building &amp; Safety, or designee. The Project Applicant shall make all necessary revisions to the plan to meet the sight distance requirement such as removing slopes or other encroachments from the limited use area in a manner meeting the approval of the Manager of Building &amp; Safety, or designee. In addition, sight distance for Project intersections and access points within the public right of way along Marine Way or Ridge Valley shall be based on City of Irvine Engineering Standard Plan 403 and City of Irvine Transportation Design Procedures.</p> <p><b>DR TRAN-5</b> In conjunction with Level I, II, or III reviews, when individual development projects under the Development Plan that require an encroachment permit from the City of Irvine, that portion of the development that requires the encroachment permit shall be evaluated for consistency with applicable design requirements outlined in the City of Irvine <i>Transportation Design Procedures</i>. Consistency with the City's design requirements shall be in a manner meeting the approval of the Manager of Building &amp; Safety, or designee.</p> <p><b>DR TRAN-6</b> The County or its designee shall prepare a construction traffic management plan, in coordination with the adjacent jurisdictions, prior to commencement of construction. The County or its designee shall provide the final plan to the City of Irvine and monitor implementation throughout the construction process. The plan shall include but not be limited to:</p> <ul style="list-style-type: none"> <li>• The identification of routes that construction vehicles will utilize for the delivery of construction materials to access the site, including any necessary traffic controls and detours, and proposed construction phasing plan for the project. Staging of truck/construction traffic will be done to avoid peak hour deliveries/traffic.</li> <li>• Specification of the hours during which transport activities can occur and methods to mitigate construction-related impacts to adjacent streets.</li> <li>• A requirement that the Applicant keep all haul routes clean and free of debris including but not limited to gravel and dirt as a result of its operations.</li> <li>• A requirement that hauling or transport of oversize loads be allowed between the hours of 9:00 AM and 3:00 PM only, Monday through Friday, unless approved otherwise by the County Manager of Building and Safety. No hauling or transport will be allowed on federal holidays unless approved by the County Manager of Building and Safety.</li> <li>• Identification of the location of construction-related parking and staging of vehicles, which shall occur on-site.</li> </ul>	<p>Less Than Significant</p>

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
		<ul style="list-style-type: none"> <li>• Identification of methods to encourage carpooling or transit use to minimize employee traffic.</li> </ul> <p>Construction on or near public rights-of-way would be required to comply with the California Manual on Uniform Traffic Control Devices (MUTCD) as adopted by the County.</p>	
<p><b>Threshold 4.14-73</b> Would the Project result in inadequate emergency access?</p>	<p>The proposed Project would not result in inadequate emergency access. The Project has been planned to be consistent with applicable emergency access requirements. In addition, DR FIRE-2 in Section 4.12, Public Services ensures adequate emergency fire access. Pursuant to Threshold 4.14-73, impacts would be less than significant and no mitigation is required.</p>	<p>Refer to <b>DR FIRE-2</b> in Section 4.12, Public Services.</p>	<p>Less Than Significant</p>
<p><b>Threshold 4.14-74</b> Would the Project conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?</p>	<p>Pursuant to Threshold 4.14-74, the Project would not conflict with adopted polices, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. The Project will create a multi-model circulation system that would accommodate various modes of transportation and facilitate connections to off-site public transit options. Implementation of DR TRAN-2 addresses the required improvements. Additionally, MM AQ-2 through MM AQ-6 (identified in Section 4.2) are measures to encourage use of multi-model transportation. Impacts would be less than significant and no mitigation is required.</p>	<p><b>DR TRAN-2</b> Prior to issuance of a grading permit the County or its designee shall design and construct, or provide evidence of an acceptable form of financial security, that improvements internal to the Project (i.e., streets, bus stops, on-road bicycle trails, street names, signs, striping and stenciling) shall be done in accordance with plans and specifications meeting the approval of the Manager of Building &amp; Safety, or designee. Further, all underground traffic signal conduits (e.g., signals, phones, power, loop detectors, etc.) and other appurtenances (e.g., pull boxes, etc.) needed for future traffic signal construction within the City of Irvine rights-of-way, and for future interconnection with adjacent intersections within the City of Irvine rights-of-way, shall be constructed in accordance with City of Irvine Engineering Standard, Plans, and Specifications.</p> <p>Also, refer to MM AQ-2 through MM AQ-6 in Section 4.2, Air Quality.</p>	<p>No Impact</p>
<p><b>Section 4.15 - Utilities and Service Systems</b></p>			
<p><b>Threshold 4.15-1</b> Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.</p>	<p>The Project would be required to comply with all applicable wastewater discharge requirements, as enforced by the Santa Ana RWQCB. Therefore, the Project's impacts would be less than significant pursuant to Threshold 4.15-1.</p>	<p>No mitigation required.</p>	<p>Less Than Significant</p>
<p><b>Threshold 4.15-2</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 impacts.</p>	<p>The Project would require water (potable and nonpotable) and wastewater service from the IRWD. A Conditional Water and Sewer Will Serve letter has been issued by IRWD (December 17, 2015) indicating IRWD has sufficient capacity and will provide required water and wastewater services based on the identified Project. Existing deficiencies identified by IRWD with or without the Project exist in Reaches A and B. The Project would use improvements identified by IRWD for Reaches A and B and IRWD has committed to providing the necessary improvements required to provide service to the Project. These improvements will be implemented by IRWD independent of whether the Project proceeds, are part of the District's Capital Improvement Program and the potential for environmental impact associated with those</p>	<p><b>DR UTIL-1</b> Prior to issuance of a grading permit, the County or its designee shall provide evidence acceptable to the Manager of Building &amp; Safety, or designee, that the SCAQMD-approved Dust Control Plan utilizes recycled water and not potable water for dust abatement.</p>	<p>Less Than Significant</p>

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
	<p>improvements would be addressed by IRWD pursuant to CEQA prior to these improvements being constructed. Based on the IRWD demands for nonpotable water in the year 2035, estimated to vary from approximately 25.9 MGD for a normal year supply and demand condition up to 29.7 MGD for an estimated a maximum dry supply and demand condition, primary treatment capacity of 33.5 mgd at the MWRP and the LAWRP combined, would be able to accommodate all wastewater discharges in order to satisfy IRWD's estimated demands for delivery of nonpotable water to its customers. The Project would not require the construction or expansion of new water or wastewater treatment facilities or expansion of existing treatment facilities. The Project would be required to construct sewer lines and local sewer collection facilities; however, the impacts associated with the construction of the local facilities have been addressed as part of the Project and no further environmental impacts are anticipated. With implementation of DR UTIL-2, wastewater flows from the proposed Project would be accommodated and impacts would be less than significant pursuant to Threshold 4.15-2.</p>		
<p><b>Threshold 4.15-3</b> Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which would cause significant environmental effects.</p>	<p>As discussed in Section 4.8, Hydrology and Water Quality, construction of new storm drain facilities associated with the proposed Project would result in a less than significant impact, pursuant to Threshold 4.15-3. DRs HWQ-1 through HWQ-9 identified in Section 4.8, Hydrology and Water Quality, would be applicable to the proposed Project.</p>	<p>Refer to <b>DRs HWQ-1 through HWQ-9</b> in Section 4.8, Hydrology and Water Quality, above.</p>	<p>Less Than Significant</p>
<p><b>Threshold 4.15-4</b> Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed.</p>	<p>The Project would require water supplies from IRWD. The WSA shows that the IRWD has available water supplies (current and under development supplies) to meet the water demands of the project for the next 20-years (through 2035), including demands during normal, single-dry and multiple-dry years. The IRWD has concurred with the findings of the WSA that available water supplies (potable and non-potable) would be adequate to serve the Project. Therefore, impacts would be less than significant and no mitigation is required, pursuant to Threshold 4.15-4.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>
<p><b>Threshold 4.15-5</b> Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.</p>	<p>IRWD would provide wastewater treatment service to the Project. Based on IRWD demands for nonpotable water in the year 2035, estimated to vary from approximately 25.9 MGD for a normal year supply and demand condition up to 29.7 MGD for an estimated a maximum dry supply and demand condition (as identified in the Project's Water Supply Assessment), the recently completed MWRP capacity expansion along with the current primary treatment capacity at</p>	<p>Refer to <b>DR UTIL-1</b>, above.</p>	<p>Less Than Significant</p>

**TABLE 1-2  
SUMMARY OF POTENTIAL IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Project Impacts	Mitigation Program	Level of Significance After Mitigation
	<p>the LAWRP (a combined total of 33.5 MGD) would be able to accommodate all wastewater discharges in order to satisfy IRWD's estimated demands for delivery of nonpotable water to its customers. IRWD has provided a Conditional Water and Sewer Will Service Letter (December 17, 2015) which indicates that IRWD would provide sewer service to the Project conditioned upon the County providing the construction of additional sewer trunk lines and local sewer collection facilities (as may be identified in the SAMP update) and necessary in-tract sewer mains. In addition, the Project would use future improvements identified by IRWD as part of their Capital Improvement Program. A SAMP addendum or update will be required prior to submittal of design drawings for any proposed IRWD facility for this Project. The September 2016 Area 51 SAMP Update only contemplated this Project's overall impacts on the IRWD facilities. Detailed information for the Project was not available; therefore, a SAMP update or addendum will be required to verify any changes to the impacts to the sewer systems. IRWD would have available wastewater treatment capacity to treat wastewater flows from the project. In addition, with IRWD's commitment and implementation of DR UTIL-1, wastewater flows from the proposed Project would be accommodated by IRWD and potential impacts related to wastewater treatment capacity would be less than significant, pursuant to Threshold 4.15-5.</p>		
<p><b>Threshold 4.15-6</b> Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?</p>	<p>There is sufficient solid waste disposal capacity in the existing landfills to meet the Project's solid waste disposal needs. Therefore, Project impacts to landfill capacity would be less than significant, pursuant to Threshold 4.15-6.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>
<p><b>Threshold 4.15-7</b> Comply with federal, state, and local statutes and regulations related to solid waste?</p>	<p>The proposed Project would comply with applicable solid waste statutes and regulations including waste diversion programs. DR UTIL-3 would be implemented with the proposed Project. Impacts to solid waste statutes and regulations would be less than significant, pursuant to Threshold 4.15-7.</p>	<p><b>DR UTIL-2</b> The County or its designee shall comply with the minimum solid waste diversion requirements of AB 939, SB 1610, and SB 341 for solid waste generated during demolition, construction, and operation. A minimum of 75 percent of construction and demolition solid waste diversion compliance shall be done through the implementation of the OC Waste &amp; Recycling's Construction &amp; Demolition Program or comparable measures to the satisfaction of the Manager of Building &amp; Safety, or designee. Pursuant to the Orange County Code of Ordinances, Title 4, Division 3, Article 2 (Solid Waste Management), Section 4-3-67 Franchise Required for Solid Waste Collection Services, waste diversion and recycling would be the responsibility of the designated franchise waste hauler under contract to the County.</p>	<p>Less Than Significant</p>