DRAFT

Supplemental Environmental Impact Report (SCH No. 2022060174)

Site B-2 Hotel Project

SEPTEMBER 2025

Prepared for:

CITY OF GARDEN GROVE
Office of Economic Development
11222 Acacia Parkway
Garden Grove, California 92840
Contact: Monica Covarrubias, Senior Project Manager

Prepared by:

DUDEK

225 South Lake Avenue, Suite M-210
Pasadena, California 91101
Contact: Nicole Cobleigh

Printed on 30% post-consumer recycled material.

Table of Contents

SECTION **PAGE NO.**

FIGURES

TABLES

APPENDICES

Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
ATN	Anaheim Transportation Network
BRT	bus rapid transit
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBSP	Commuter Bikeways Strategic Plan
CEQA	California Environmental Quality Act
CFCs	chlorofluorocarbons
CH_4	methane
City	City of Garden Grove
CNRA	California Natural Resources Agency
CO_2	carbon dioxide
CO_2e	CO_2 equivalent
EPA	U.S. Environmental Protection Agency
FAR	Floor Area Ratio
GHG	greenhouse gas
GWP	global warming potential
HCFCs	hydrochlorofluorocarbons
HFCs	hydrofluorocarbons
I	Interstate
IPCC	Intergovernmental Panel on Climate Change
IS	Initial Study
LOS	level of service
MM	Mitigation Measure
MMRP	Mitigation Monitoring and Reporting Program
MND	Mitigated Negative Declaration
MMT	million metric tons
MT	metric tons
N_2O	nitrous oxide
NF_3	nitrogen trifluoride
NOP	Notice of Preparation
O_3	ozone
OCTA	Orange County Transportation Authority
OCTAM	Orange County Transportation Analysis Model
OEHHA	Office of Environmental Health Hazard Assessment
PDF	Project Design Feature
PFCs	perfluorocarbons
Project	Site B-2 Hotel Project
PUD	Planned Unit Development

Acronym/Abbreviation	Definition
RTP	Regional Transportation Plan
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCS	Sustainable Communities Strategy
SED	socio-economic data
SEIR	Supplemental Environmental Impact Report
SF_6	sulfur hexafluoride
SR	State Route
TAZ	traffic analysis zone
TPA	Transit Priority Area
VMT	vehicle miles traveled
Writ	Writ of Mandate
ZEV	zero emission vehicles

1 Executive Summary

1.1 Introduction

This Supplemental Environmental Impact Report (SEIR) has been prepared by the City of Garden Grove (City) in response to a Writ of Mandate regarding the proposed Site B-2 Hotel Project (Project). This SEIR has been prepared pursuant to the Writ of Mandate and in conformance with the California Environmental Quality Act of 1970 (CEQA) statutes (California Public Resources Code Section 21000 et seq., as amended) and its implementing guidelines (California Code of Regulations [CCR] Title 14, Section 15000 et seq.). Pursuant to Section 15367 of the State CEQA Guidelines, the City is the lead agency for the Project. This summary provides a brief description of the Project, alternatives to the Project, and areas of controversy known to the City. This chapter provides a table summarizing the environmental analysis that was conducted pursuant to the Writ regarding the Project's Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) impacts, that lists: (1) the potential environmental impacts that would occur as the result of the Project; (2) the level of impact significance before mitigation; (3) the proposed mitigation measures that would avoid or reduce significant environmental impacts; and (4) the level of impact significance after mitigation measures are implemented.

1.2 Project Background

In 2022, the City Council and/or Successor Agency approved the Project. Those approvals were challenged in litigation filed in Orange County Superior Court. Following those approvals, a Notice of Determination (NOD) was filed on August 24, 2022, with the County of Orange County Clerk. Those approvals were challenged in litigation filed in an Orange County Superior Court lawsuit challenging the City's MND. (*Perez et.al. v. City of Garden Grove et al.* OCSC Case No. 30-2022-01281816-CU-WM-CC.). That litigation led to the Court's entry of a Writ of Mandate, included as Appendix B hereto ("Writ").

Pursuant to the Writ, except as specified below, all claims challenging the 2022 approvals were dismissed with prejudice and the City and developer were directed to:

> (a) prepare a focused review under CEQA of the Project's or modified Project's potentially significant Vehicle Miles Travelled (VMT) and Greenhouse Gas (GHG) impacts; (b) assess whether modifications are needed to the Approvals, including any mitigation measures and conditions of approval, in light of that focused CEQA analysis; and (c) approve, approve with modifications, or deny the PUD in open session during a publicly agendized meeting of the City Council pursuant to Municipal Code section 9.32.030.

Pursuant to the Writ, this SEIR includes a focused review under CEQA of the Project's potentially significant VMT and GHG Emissions impacts.

1.3 SEIR Organization

This SEIR is organized as follows:

Chapter 1, Executive Summary. This chapter provides a summary of the Project description, Alternatives to the proposed Project, environmental impacts, mitigation measures, and determination of significance of each impact.

Chapter 2. Introduction. This chapter briefly discusses the purpose of the Draft SEIR and provides a summary of the relevant CEQA Guidelines that govern the preparation of this SEIR. This chapter summarizes the scoping period and the comments received by the City on the Notice of Preparation (NOP) during the scoping process.

Chapter 3. Project Description. In accordance with Section 15124 of the State CEQA Guidelines, this chapter outlines the City's underlying purpose and objectives for the Project and includes a summary of the components of the Project. A discussion of discretionary actions needed to approve the Project, and a list of other public agencies expected to use the SEIR in their decision making are also included.

Chapter 4. Environmental Analysis. In accordance with Section 15126 of the State CEQA Guidelines, this chapter includes Section 4.1 and Section 4.2, consistent with the requirements outlined in the Writ. Each section includes the following: existing conditions of the Project site and vicinity, identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, mitigation measures (if any), level of significance after mitigation, and references. Chapter 4 includes the following sections:

- Section 4.1, Greenhouse Gas Emissions
- Section 4.2, Vehicle Miles Traveled

Chapter 5. Other CEQA Considerations. In accordance with Section 15126(c) and (d), this chapter contains a summary discussion of any significant unavoidable impacts, potential growth-inducing impacts, energy impacts, and any significant irreversible environmental changes that would be caused by the Project.

Chapter 6. Alternatives. Pursuant to Section 15126.6 of the State CEQA Guidelines, this chapter includes an analysis of a reasonable range of feasible alternatives to the Project. Alternatives are analyzed that would feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen any of the significant effects of the Project. The comparative merits of each alternative are evaluated when compared to the proposed Project, and an environmentally superior alternative is identified in compliance with Section 15126.6(e)(2).

Chapter 7. List of Preparers. This chapter lists the persons who directly contributed to preparation of the Draft SEIR.

1.4 Overview of the Project

1.4.1 Project Description

The proposed Project involves construction of a full-service high-rise (maximum height of 350 feet) resort hotel with hotel program entertainment/pool deck (height of approximately 61 feet) on a 3.72-acre site at the northwest corner of Harbor Boulevard and Twintree Avenue in the City. The Project site is previously disturbed where the north/northeastern parcels of the Project site are paved and used for excess parking for the adjacent Sheraton Hotel and the remaining parcels are dirt pads with limited vegetation that are vacant. The proposed hotel would

include 500 guest suites with balconies and guest amenities/services such as a themed pool experience with lazy river; theater; a ballroom; meeting rooms; food and beverage spaces, themed amenities and shops, an arcade; and a spa and fitness center. The proposed Project would also include a five-level (approximately 61 feet) parking garage (four levels above grade and one level below grade) with a total of 528 spaces inclusive of spaces available for valet parking. Project construction would last approximately 30 months and be completed in a single phase.

1.4.2 Project Objectives

The primary objectives of the proposed Project include the following:

- Design, develop, and construct a development on an underutilized property with all required infrastructure in the immediate proximity.
- Develop a destination hotel that incorporates sustainability features such as on-site solar energy, lower water use appliances and energy saving fixtures on a property within a transit priority area.
- Provide for an enhanced overnight guest experience with themed amenities attractive to families and other visitors who will use the project as a tourist destination location in and of itself.
- Develop a project that allows for efficient operations and logistics.
- Implement the project site's International West General Plan designation by including hotel, entertainment and resort elements to promote guest visits of multiple days.
- Develop a destination hotel in a location with convenient access to public transit and a shuttle system that connects the project to other tourist attractions in the area including those along the Harbor Boulevard Resort corridor.
- Support increased tourism in the City while also complementing other tourist destinations in surrounding communities.
- Generate a material amount of transient occupancy and property tax revenue for the City.
- Generate additional construction and operational jobs to support the local and regional economy.
- Develop a facility of sufficient size and with sufficient amenities to attract a partnership with a national or international theme park franchise.

1.4.3 Project Design Features

An Initial Study/Mitigated Negative Declaration (IS/MND) was previously prepared for the proposed Project and approved by the City of Garden Grove in 2022 and included several Project Design Features (PDFs) as conditions of approval. The following section summarizes those applicable PDFs that are incorporated here. It should be noted that all the following PDFs are qualitative/supporting measures. Therefore, for purposes of quantifying the Project's GHG emissions, no GHG reductions were taken from implementation of these measures.

1.4.3.1 Construction

PDF-4 Construction equipment should be maintained in proper tune.

Qualitative/supporting – Maintaining heavy-duty off-road construction equipment in proper tune reduces GHG emissions. When engines are well-maintained—through regular servicing, timely replacement of filters, proper lubrication, and calibration—they operate more efficiently, burn fuel more

completely, and emit fewer pollutants. There is no way to quantify these reductions in CalEEMod. Potential GHG emissions reductions are not estimated.

PDF-5 All construction vehicles should be prohibited from excessive idling. Excessive idling is defined as five (5) minutes or longer.

Qualitative/supporting – Reduction in idling time helps to reduce fuel consumption and thus GHG emissions. There is no way to quantify these reductions in CalEEMod. Potential GHG emissions reductions are not estimated.

PDF-8 Establish an electricity supply to the construction site and use electric powered equipment instead of diesel-powered equipment or generators, where feasible.

Qualitative – Results in a reduction of diesel and gasoline and thus GHG emissions. Conservatively, given the uncertainty in predicting the amount of reduction and the mix of electric powered equipment and phase of construction, it would have been too speculative to take GHG emission reductions from this PDF.

PDF-10 Use haul trucks with on-road engines instead of off-road engines for on-site hauling.

Qualitative/supporting – On-road trucks are subject to more stringent emissions regulations such as Environmental Protection Agency (EPA) highway standards and California Air Resources Board (CARB) emission standards compared to off-road equipment. On-road trucks are also typically designed for better fuel economy resulting in fewer GHG emissions. There is no way to quantify these reductions in CalEEMod. Potential GHG emissions reductions are not estimated.

1.4.3.2 Operations

PDF-11 The Project should comply with the mandatory requirements of the latest California Building Standards Code, Title 24, Part 6 (Energy Code) and Part 11 (California Green Building Standards Code [CALGreen]), including the provisions for bicycle parking, electric vehicle charging stations, energy efficiency, material conservation, and water/waste reduction.

Qualitative/supporting – Complying with Title 24 Building Energy Efficiency Standards reduces GHG emissions by improving energy efficiency in non-residential buildings. Title 24 includes mandatory and voluntary green building measures that promote sustainable construction practices, reduce water usage, and support the integration of renewable energy systems like solar photovoltaics. These standards help decrease reliance on fossil fuels, thereby lowering emissions from power generation and building operations. Project compliance with current standards would generate GHG emission reductions compared to the CalEEMod GHG estimates disclosed in this technical report. CalEEMod provides conservative energy use estimates because its calculations are based on the 2019 consumption estimates from the California Energy Commission's' 2018-2030 Uncalibrated Commercial Sector Forecast and is based on default assumptions for building energy use, occupancy, and equipment efficiency, which does not reflect the most recent Title 24 energy efficiency standards. It would be speculative to estimate potential reductions with future standards in place at the time of building permit issuance for construction, when the current Title 24 standards would apply to building

operations. Proof of compliance with Title 24 standards is required prior to issuance of certificate of occupancy. Potential GHG reductions are not estimated.

PDF-12 Install signage at loading docks requiring trucks to limit engine idling times to 5 minutes or less.

Qualitative/supporting – The California Air Resources Board (CARB) has an Airborne Toxic Control Measure (ATCM) to limit diesel-fueled commercial motor vehicle idling, primarily to reduce public exposure to diesel exhaust. This ATCM, outlined in 13 CCR § 2485, restricts idling of diesel-fueled commercial vehicles (greater than 10,000 lbs) to a maximum of five consecutive minutes at any location. Limiting engine idling would reduce fuel combustion and thus reduce GHG emissions. There is no available method to estimate potential GHG emission reductions in CalEEMod attributable to the limit on idling time. This is a qualitative measure in CalEEMod, thus potential GHG emissions reductions are not estimated.

PDF-21 Engine idling time for all delivery vehicles and trucks must be limited to 5 minutes or less. Signage should be posted in the designated loading areas reflecting the idling restrictions.

Qualitative/supporting – This measure is intended to apply to all delivery vehicles and trucks accessing the site, regardless of potential vehicle weight that would be subject to CARB's ATCM for idling. Limiting engine idling would reduce fuel combustion and thus reduce GHG emissions. There is no available method to estimate potential GHG emission reductions in CalEEMod attributable to the limit on idling time. This is a qualitative measure in CalEEMod, thus potential GHG emissions reductions are not estimated.

1.5 Issues To Be Resolved

Section 15123(b)(3) of the CEQA Guidelines requires that an EIR contain issues to be resolved including the choice among alternatives and whether or how to mitigate significant impacts. With regard to the Project, the major issues to be resolved include decisions by the lead agency as to the following:

1. Whether the benefits of the Project override those environmental impacts which cannot be feasibly avoided or mitigated to a level of insignificance.
2. Whether there are any alternatives to the Project that would substantially lessen any of the significant impacts of the Project and achieve most of the basic Project objectives.

1.6 Areas of Known Controversy

A Notice of Preparation for this SEIR was published on April 18, 2025, beginning the 30-day public scoping period for the SEIR. During the public scoping period, input is obtained from public agencies and the general public regarding the environmental issues and concerns that may potentially result from the Project. Comments on the NOP were received from six organizations, which are provided in Appendix A. The City hosted a Scoping Meeting on April 30, 2026. Attendees at the Scoping Meeting all indicated support for the Project.

There are no areas of known controversy for the proposed Project. However, the following is a list of topics that were brought up during the scoping period. Concerns applicable to the CEQA process, in the context of the Writ, are addressed in this SEIR.

- Request for notice of any and all actions or hearings related to activities undertaken by the City related to the Project.
- AB 52 consultation requirements
- Request for the Project to rely on the South Coast Air Quality Management District's CEQA guidance and evaluate all phases of the Project and air pollutant sources
- Request for the Project applicant to consider including a Transportation Demand Management analysis within the EIR and implementation of appropriate detours, signage, and safety measures for pedestrians and bicyclists in the construction phase and encouragement of Complete Street design
- Request that the City should clarify what environmental review is being supplemented and receipt of all notices concerning any CEQA/land use actions associated with the Project

1.7 Required Permits and Approvals

The City is the lead agency for the proposed Project pursuant to CEQA Guidelines Section 15367. The proposed Project may require a number of permits and approvals by the City, including the following:

- Certification of the SEIR
- Adoption of Findings of Fact and Statement of Overriding Considerations
- Adoption of Mitigation Monitoring and Reporting Program
- Approval of Zone Change to subzone Planned Unit Development No. PUD-141-01(A)
- Approval of Grading
- Approval of Building and Occupancy Permits
- Approval of Final Water Quality Management Plan and Stormwater Pollution Prevention Plan (SWPPP)
- Other related approvals as specified during the entitlement process

1.8 Summary of Environmental Impacts and Mitigation

Table 1-1 summarizes the conclusions of the environmental analysis contained in this SEIR. Table 1-1 provides a complete list of the project's environmental impacts including the level of significance before and after mitigation, based on the analysis and conclusions presented in Chapter 4 of this SEIR. The potentially significant impacts related to VMT and conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs can be reduced to less than significant through incorporation of mitigation measures identified in Chapter 4 (see Impact GHG-2 and Impact TRA-1 in Section 4.1, Greenhouse Gas Emissions and Section 4.2, Transportation). The Project would result in significant unavoidable Project and cumulative impacts to GHG emissions, even with the implementation of identified mitigation measures (see Impact GHG-1 Section 4.1, and Table 1-1 for details).

Table 1-1. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
Greenhouse Gas Emissions			
Generate GHG emissions, either directly or indirectly, that may have a significant effect on the environment.	Potentially Significant	**MM-GHG-1. Electric Construction Equipment.** Prior to issuance of building permits, the Project applicant or designee shall submit documentation to the City of Garden that temporary power will be established to the Project site during vertical construction. All generator(s) and crane(s) shall be electric-powered. In addition, the Project shall limit air compressors used during the architectural coating/painting phase to equipment that is electric-powered. **MM-GHG-2. Construction Office Energy Efficiency.** Prior to issuance of building permits, the Applicant or designee shall submit documentation to the City of Garden Grove that temporary construction field office(s) are equipped with energy efficient lighting such as compact fluorescent or LEDs and that heating and cooling units are Energy Star certified. **MM-GHG-3. Construction Debris Recycling.** Prior to the start of construction, the Project's contractor shall develop a Construction Waste Management Plan for submittal and approval to the City of Garden Grove. The Construction Waste Management Plan shall recycle or salvage non-hazardous construction debris such that a minimum target of 75% is achieved. This will exceed the City's current target of 65% diversion. **MM-GHG-4. Electric Vehicle Charging Infrastructure.** Prior to issuance of building permits, the Project applicant or designee shall submit a site plan to the City of Garden Grove for approval noting the location of electric vehicle infrastructure and charging stations. Prior to issuance of the final certificate of occupancy, the Project applicant or designee shall provide electric vehicle (EV) charging infrastructure within the Project site as required by the	Significant and unavoidable

Table 1-1. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		applicable California Green Building Standards Code, but that, at a minimum, meets or exceeds 2022 California Green Building Standards Code Tier 2 standards. Tier 2 requires approximately 225 parking spaces to be EV capable, and 75 spaces to be equipped with EV Supply Equipment (EVSE). The Project shall install a minimum of 225 EV capable spaces and 100 EVSE spaces. **MM-GHG-5. Guest Vehicle Trip Reductions.** Prior to issuance of building permits, the Project applicant shall submit a site plan to the City of Garden Grove for approval identifying where pedestrian and bicycle connections to adjacent facilities will be provided and where bicycle parking spaces will be provided. The City shall verify the inclusion of pedestrian and bicycle infrastructure prior to the issuance of the final certificate of occupancy. The Project applicant or designee shall ensure that, at a minimum, the following trip reduction measures are implemented during Project operations to reduce the number of auto-based trips generated by the Project and to encourage the use of transit, bicycling, and walking. ▪ Improve the walkability and design of the Project by providing pedestrian and bicycling connections within the Project site and to adjacent off-site facilities (i.e., sidewalks, crosswalks, wayfinding signage, etc.). ▪ Provide secure on-site bicycle racks to accommodate a minimum of 38 bicycle parking spaces and provide bicycle rentals for hotel guests. ▪ Alternative transportation services such bike rentals and transit information shall be seamlessly integrated into the guest experience, making alternative modes of travel easy to understand, access, and use.	

Table 1-1. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		▪ Hotel management/concierge should provide information that promotes walking, bicycling and public transit options to nearby attractions. This should include information on local bus routes and schedules and wayfinding to the existing transit stops along Harbor Boulevard. ▪ Qualitative assessments (e.g., user satisfaction surveys, walk audits, guest feedback) shall be regularly conducted to evaluate the effectiveness of trip reduction strategies. ▪ An annual report summarizing how transportation options are being used, guest perceptions, and planned improvements shall be submitted to the City. **MM-GHG-6. Limit Large Diesel Trucks During Operation.** Prior to issuance of certificate of occupancy, the Project applicant or designee shall submit a Truck Delivery Management Plan to the City of Garden Grove that documents how truck deliveries will be restricted and monitored. The Project applicant or designee shall implement a monitoring program to restrict the number of large diesel trucks coming to the site (i.e. for deliveries, trash collection, or other services) to an average of 10 trucks per day or less. This restriction is specifically applicable to trucks classified as medium-heavy duty and heavy-heavy duty with gross vehicle weight (GVW) greater than 19,500 pounds. Annual reports summarizing heavy-duty truck trips shall be provided to the City of Garden Grove. **MM-GHG-7. Building Energy Efficiency Measures.** Prior to issuance of building permits, the Project applicant or designee shall submit documentation of building energy efficiency measures to the City of Garden Grove. Energy efficiency measures shall include, at a minimum, the following:	

Table 1-1. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		1. LED Lighting - High-lumen LED light fixtures shall be used exclusively for the lighting of spaces throughout the Project that require 8 to 10 watts per fixture 2. Energy efficient lighting shall be incorporated into all on-site lighting. 3. HVAC Optimization - The HVAC system shall include the following: a. Heat pumps will be used to heat spaces and water using a heat exchanger and will be monitored by the Project Building Management System (BMS). b. Smart thermostats, which include a motion sensor detector and door/window open sensors, will be installed in each guest room. c. The central plant will utilize a Combination Plant with SmartPlate EV 4. Glazing - All glazing for the tower and exterior public spaces shall be installed with Low-E glass [U-factor (thermal transmittance) ≤ 0.28 and Solar Heat Gain Coefficient (SHGC) ≤ 0.23. 5. Energy Management System - The Project shall use advanced systems to monitor and optimize energy use in real time. 6. Benchmarking and Monitoring- The Project shall incorporate an Energy Star Portfolio Management system to track and manage energy consumption 7. Third-Party Verification/LEED Certification - The Project shall obtain third-party HVAC commissioning verification or LEED certification to verify energy savings	

Table 1-1. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		MM-GHG-8. Cool Roof/Deck. Prior to issuance of building permits, the Project applicant or designee shall submit plans to the City for approval that require cool roof and cool deck surfaces to be included as part of the Project for the podium and tower, consistent with the specifications provided below. ▪ Cool Roof Installation: All roofing materials shall meet or exceed the California Title 24, Part 6 requirements for cool roofs, based on roof slope: ▪ Low-sloped roofs ($\leqslant$ 2:12 pitch): - Aged Solar Reflectance (SR) $\geqslant$ 0.63 - Thermal Emittance (TE) $\geqslant$ 0.75 - Or Solar Reflectance Index (SRI) $\geqslant$ 75 ▪ Steep-sloped roofs (> 2:12 pitch): - Aged SR $\geqslant$ 0.20 - TE $\geqslant$ 0.75 - Or SRI $\geqslant$ 16 ▪ Cool Deck Surfaces: All exterior hardscape surfaces exposed to sunlight (e.g., pool decks, patios, walkways) shall use high-albedo materials or cool surface coatings with: - Minimum SR of 0.29 or higher - Or materials with a demonstrated surface temperature reduction of at least 10°F compared to conventional concrete or asphalt To meet the above standards, the project applicant may implement one or more of the following:	

Table 1-1. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		▪ Use Energy Star®-rated roofing products or materials listed in the Cool Roof Rating Council (CRRC) directory. ▪ Apply reflective coatings or single-ply membranes with compliant SR and TE values. ▪ Install light-colored or permeable pavers, cool concrete, or coated surfaces for decks and walkways, such as permeable interlocking concrete pavers, porous asphalt, permeable concrete, geocell systems, or bio-asphalt. ▪ Incorporate green roofs or vegetated shading structures as alternative compliance pathways (subject to City approval). Monitoring and Reporting shall include: ▪ Submittal of roofing and hardscaping material specifications to the City of Garden Grove Building Division prior to issuance of building permits. ▪ City inspectors shall verify installation during final inspection and prior to issuance of the final certificate of occupancy. **MM-GHG-9. Renewable Energy.** The Project Applicant or designee shall install a solar photovoltaic system capable of generating a minimum of 267,000 kilowatt hours (kWh) per year prior to issuance of certificate of occupancy. **MM-GHG-10. Water Conservation.** Prior to receiving the final certificate of occupancy, the Project applicant or designee shall submit a Water Conservation Compliance Report to the City of Garden Grove for review and approval. The Project shall achieve a minimum 10% reduction in total water use compared to the baseline of 167 gallons per room per day as identified in the Water Supply Assessment (Psomas 2022). This equates to a target of no more than 150.3 GPCD at full occupancy. The Water Conservation Compliance Report shall include product specifications for	

Table 1-1. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		all water-saving fixtures and systems, landscape and irrigation plans, greywater system design and capacity documentation, post-occupancy water use monitoring plan for the first 12 months after occupancy. To meet or exceed the performance standard, the Project may implement a combination of the following water conservation strategies: ▪ Low-Flow Water Fixtures for guest rooms and public area ▪ Smart Irrigation System - outdoor landscaping shall include weather-based irrigation controllers and drought-resistant landscaping to minimize outdoor water use. ▪ Greywater Recycling. **MM-GHG-11. Waste Reduction.** Prior to issuance of the final certificate of occupancy, the Project applicant or designee shall submit a Waste Management, Recycling, and Composting Plan to the City of Garden Grove for review and approval. The program shall be implemented on-site at the Project location and apply to all operational areas, including guest services, food and beverage operations, maintenance, and administrative functions. The waste reduction program shall be fully implemented during Project operations. The Plan shall specify a minimum diversion of 25% of municipal solid waste generated on-site from landfill disposal. The Waste Management, Recycling, and Composting Plan may include but not be limited to the following: ▪ Recycling Program - Labeled bins for recyclables and certified hauler contracts. ▪ Organics and Composting Program - Collection of food scraps and compostables. ▪ Source Reduction Measures	

Table 1-1. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		- Reduce single-use items and paper use ▪ Employee and Guest Education - Staff training and signage for guests ▪ Monitoring and Reporting - Track waste and submit Annual Waste Diversion Report to the City of Garden Grove **MM-GHG-12. Zero Emission Landscape Equipment.** During Project operations, the Project Applicant or designee shall ensure zero-emission landscape equipment (defined as equipment that does not emit tailpipe emissions during operation) is utilized. The Project applicant or designee shall be responsible for ensuring that all landscape maintenance contractors and staff comply with this measure. All landscape maintenance activities associated with the Project shall utilize zero-emission landscaping equipment, such as electric-powered or battery-operated tools. This requirement applies to all landscaped areas within the Project site, including but not limited to courtyards, green spaces, perimeter landscaping, and rooftop gardens. The requirement shall be implemented prior to the commencement of landscape maintenance operations. To meet or exceed the performance standard, the Project may implement a combination of the following strategies: <u>Electric-Powered Equipment</u> ▪ Use of electric or battery-powered: - Leaf blowers - Lawn mowers - Hedge trimmers - Edgers	

Table 1-1. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		- Chainsaws <u>Contractor Requirements</u> ▪ Include zero-emission equipment requirements in all landscape maintenance contracts. ▪ Require contractors to provide documentation of equipment type and compliance. <u>On-Site Charging Infrastructure</u> ▪ Install dedicated charging stations or outlets for landscape equipment. <u>Equipment Inventory and Tracking</u> ▪ Maintain an inventory of all landscape equipment used on site. ▪ Submit an annual compliance report to the City of Garden Grove verifying that only zero-emission equipment is in use. <u>Training and Education</u> ▪ Provide training to landscape maintenance staff on the proper use and maintenance of electric equipment. ▪ Display signage or include information in sustainability reports to promote awareness. **MM-GHG-13. Prohibit Woodburning devices, Natural Gas Fireplaces and Fire Pits.** Prior to the issuance of building permits, the Project applicant or designee shall submit building design plans for approval of the City showing the prohibition of on-site woodburning devices, natural gas fireplaces, fire pits, or other decorative combustion features throughout the Project site. Prior to the issuance of the final certificate of occupancy, the City shall confirm that this prohibition has been implemented.	

Table 1-1. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		MM-GHG-14. Refrigerant Management Program. Prior to issuance of mechanical permits, the Project Applicant or designee shall develop and submit a Refrigerant Management Program to the City of Garden for review and approval. The Project applicant or designee shall be responsible for developing, implementing, and maintaining the refrigerant management program in coordination with HVAC contractors and facility operations staff. The Refrigerant Management Program shall include the use of low-GWP refrigerants (e.g., R-32 or better) and incorporate best management practices to reduce emissions from service, operation, and disposal of refrigerants. This measure shall apply to all refrigeration and HVAC systems installed and operated within the Project site, including guest rooms, common areas, kitchens, and mechanical rooms. The Project shall ensure that: ▪ 100% of installed HVAC and refrigeration systems use refrigerants with a GWP $\leqslant$ 750, consistent with California Air Resources Board (CARB) regulations. ▪ The refrigerant management program shall achieve a minimum 10% reduction in potential refrigerant emissions compared to standard industry practices, as demonstrated through leak rate tracking and maintenance logs. To meet or exceed the performance standard, the Project may implement a combination of the following strategies: <u>Mechanical Equipment</u> ▪ Install microchannel heat exchangers in A/C equipment in place of conventional heat exchangers. <u>Use of Low-GWP Refrigerants</u>	

Table 1-1. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		▪ Select refrigerants such as R-32, R-454B, or other CARB-compliant alternatives with GWP ⩽ 750. ▪ Avoid high-GWP refrigerants such as R-410A and R-404A. <u>Leak Detection and Prevention</u> ▪ Install automatic leak detection systems for large-capacity systems. ▪ Conduct quarterly inspections and maintain leak logs. <u>Refrigerant Recovery and Disposal</u> ▪ Use certified technicians for refrigerant recovery and disposal. ▪ Maintain documentation of recovered and recycled refrigerants. <u>Preventive Maintenance Program</u> ▪ Implement a scheduled maintenance plan to inspect and service HVAC and refrigeration systems. ▪ Include refrigerant charge optimization and system performance checks. <u>Training and Certification</u> ▪ Ensure all HVAC technicians are EPA Section 608 certified. ▪ Provide training on low-GWP refrigerant handling and leak prevention. <u>Third-Party Verification</u> ▪ Obtain third-party verification of refrigerant management practices through programs such as GreenChill or LEED Enhanced Refrigerant Management credit.	

Table 1-1. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		Prior to issuance of certificate of occupancy, the City of Garden Grove will verify that the equipment specified in the Refrigerant Management Program has been installed. Ongoing compliance shall be performed by the Project applicant or their designee. **MM-GHG-15. Carbon Offsets.** The Project Applicant (or its designee) shall implement the following carbon offsets in accordance with the Project's construction and operational phases as outlined below. *Timeline for Acquisition of Carbon Offset Credits* *Construction* Prior to issuance of grading permits, the Project Applicant (or its designee) shall purchase and retire carbon offsets in a quantity sufficient to offset all construction GHG emissions in a lump sum with the quantification, performance standards, and requirements set forth below. Alternatively, construction offsets may be purchased on an annual basis by purchasing the first phase of construction offsets prior to start of grading and then purchasing offsets for each following year by December 31 of the year preceding the new year in which construction will occur. Annual construction GHG emission offsets shall also be subject to the same quantification, performance standards, and requirements set forth below. *Operation* Prior to issuance of the final certificate of occupancy, the Project Applicant or its designee shall purchase and retire carbon offsets in a quantity sufficient to offset, for a 30-year period following occupancy of the Project, the construction and operational GHG emissions from Project to the 1,400	

Table 1-1. Summary of Environmental Impacts and Mitigation Measures

<table>
<tr><th>Environmental Topic</th><th>Impact</th><th>Mitigation Measure(s)</th><th>Level of Significance After Mitigation</th></tr>
<tr><td></td><td></td><td>MT CO_2e per year threshold, consistent with the quantification, performance standards and requirements set forth below. Alternatively, the Project Applicant or its designee may purchase and retire annual operational GHG offsets for a period of 30 years by December 31 of the year preceding each new year after the issuance of the final certificate of occupancy. Annual operational GHG emission offsets shall also be subject to the same quantification, performance standards, and requirements set forth below.

Quantification of GHG Emissions and Reductions Required.

<u>Construction</u>

The estimated total construction GHG emissions to be offset are 3,362.30 MT CO_2e if purchased in a lump sum. If purchased on an annual basis, the following schedule provides the estimated annual emissions and date of compliance.
<table>
<tr><th>Year</th><th>Offsets Required MT CO_2e</th><th>Purchase and Retirement Deadline</th></tr>
<tr><td>1</td><td>402.52</td><td>Prior to issuance of grading permits</td></tr>
<tr><td>2</td><td>1,434.02</td><td>December 31st of Year 1</td></tr>
<tr><td>3</td><td>1,410.81</td><td>December 31st of Year 2</td></tr>
<tr><td>4</td><td>114.95</td><td>December 31st of Year 3</td></tr>
<tr><td>Total</td><td>3,362.30</td><td></td></tr>
</table>
<u>Operation</u>

The estimated operational emissions are 7,408.02 MT CO_2e. To mitigate operational emissions below the 1,400 MT CO_2e</td><td></td></tr>
</table>

Table 1-1. Summary of Environmental Impacts and Mitigation Measures

<table>
<tr><th>Environmental Topic</th><th>Impact</th><th>Mitigation Measure(s)</th><th>Level of Significance After Mitigation</th></tr>
<tr><td></td><td></td><td>threshold, the Project would purchase and retire one lump sum of 180,270.60 MT CO_2e of offsets [7,408.02 MT CO_2e – 6,009.02 (offsets) = 1,399 MT CO_2e remaining]; 6,009.02 MT CO_2e x 30-year life = 180,270.60 MT CO_2e; or purchase and retire 6,002.46 MT CO_2e of offsets on an annual basis for 30 years. The following schedule provides the estimated offset emissions and dates of compliance.
<table>
<tr><th>Scenario</th><th>Offsets Required MT CO_2e</th><th>Purchase and Retirement Deadline</th></tr>
<tr><td>Lump Sum</td><td>180,270.60</td><td>Prior to issuance of certificate of occupancy</td></tr>
<tr><td>Annual Basis 30-year term</td><td>6,009.02</td><td>Prior to issuance of certificate of occupancy for Year 1 and December 31st of preceding year.</td></tr>
</table>
If the Project Applicant or its designee selects the Annual Basis scenario initially, they can purchase and retire the remaining offsets required in a lump sum in accordance with the remaining term and conditions outlined herein.

Carbon Offset Standards – Eligible Registries, Acceptable Protocols, Defined Terms, and Geographic Priorities

“Carbon offset” shall mean an instrument, credit or other certification verifying the reduction of GHG emissions issued by the following CARB-accredited registries: Climate Action Reserve, the American Carbon Registry, or Verra (formerly, the Verified Carbon Standard); as well as credits issued for</td><td></td></tr>
</table>

Table 1-1. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		projects listed on the California Carbon Sequestration and Climate Resiliency Project Registry, which is maintained by the California Natural Resources Agency and may provide additional offsets. This shall include, but is not limited to, an instrument, credit or other certification issued by these registries for GHG reduction activities. The Project shall neither purchase offsets from the Clean Development Mechanism registry nor purchase offsets generated under Clean Development Mechanism protocols. To be eligible under this mitigation measure, carbon offsets must satisfy the "Reporting and Enforcement Standards" below and demonstrate that each registry shall continue its existing practice of requiring the following for the development and approval of protocols or methodologies: 1. Adherence to established GHG accounting principles set forth in the International Organization for Standardization (ISO) 14064, Part 2 or the World Resources Institute/World Business Council for Sustainable Development (WRI/WBCSD) Greenhouse Gas Protocol for Project Accounting; and 2. Oversight of the implementation of protocols and methodologies that define the eligibility of carbon offset projects and set forth standards for the estimation, monitoring and verification of GHG reductions achieved from such projects. The protocols and methodologies shall: a. Be developed by the registries through a transparent public and expert stakeholder review process that affords an opportunity for comment and is informed by science;	

Table 1-1. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		b. Incorporate standardized offset crediting parameters that define whether and how much emissions reduction credit a carbon offset project should receive, having identified conservative project baselines and the length of the crediting period and considered potential leakage and quantification uncertainties; c. Establish data collection and monitoring procedures, mechanisms to ensure permanency in reductions, and additionality and geographic boundary provisions; and, d. Adhere to the principles set forth in the program manuals of each of the aforementioned registries, as such manuals are updated from time to time. The current registry documentation, includes the Climate Action Reserve's *Reserve Offset Program Manual*[1] (April 2024) and *Climate Forward Program Manual*[2] (December 2021); the American Carbon Registry's *The ACR Standard, Requirements and Specifications for the Quantification, Monitoring, Reporting, Verification, and Registration of Project-Based GHG Emissions Reductions and Removals*[3] (July 2023); and, Verra's VCS Standard, *Program Guide*[4] (August 2023) and *Methodology Requirements*[5] (October 2023).	

1 https://climateactionreserve.org/wp-content/uploads/2024/04/Reserve-Program-Manual-v9.2.pdf
2 https://climateforward.org/wp-content/uploads/2021/12/Climate-Forward-Program-Manual-December-2021_12-FINAL.pdf
3 https://acrcarbon.org/wp-content/uploads/2023/10/ACR-Standard-v8.0.pdf
4 https://verra.org/documents/vcs-program-guide-v4-4/
5 https://verra.org/documents/vcs-methodology-requirements-v4-4/

Table 1-1. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		The City has reviewed the registries' methodologies and has determined that protocols established pursuant to such methodologies – including updates to those protocols and methodologies as may occur from time to time by the registries in accordance with the registry documentation listed in the prior paragraph to ensure the continuing efficacy of the reduction activities – are eligible for use under this mitigation measure. The carbon offsets purchased to satisfy this measure must represent the reduction or sequestration of one MT CO_2e that is "not otherwise required" (CEQA Guidelines Section 15126.4(c)(3)). The carbon offsets must achieve the standard of additional, real, permanent, quantifiable, verifiable, and enforceable reductions, which are defined for purposes of this mitigation measure as follows consistent with the applicable provisions in the California Code of Regulations, Title 17: 1. "Additional" means that the carbon offset is not otherwise required by law or regulation, and not any other GHG emissions reduction that otherwise would occur. 2. "Real" means that the GHG reduction underlying the carbon offset results from a demonstrable action or set of actions, and is quantified under the protocol or methodology using appropriate, accurate, and conservative methodologies that account for all GHG emissions sources and sinks within the boundary of the applicable carbon offset project, uncertainty, and the potential for activity-shifting leakage and market-shifting leakage. 3. "Verifiable" means that the GHG reduction underlying the carbon offset is well documented, transparent and	

Table 1-1. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		set forth in a document prepared by an independent verification body that is accredited through the American National Standards Institute (ANSI). 4. "Permanent" means that the GHG reduction underlying the carbon offset is not reversible; or, when GHG reduction may be reversible, that a mechanism is in place to replace any reversed GHG emission reduction. 5. "Quantifiable" means the ability to accurately measure and calculate the GHG reduction relative to a project baseline in a reliable and replicable manner for all GHG emission sources and sinks included within the boundary of the carbon offset project, while accounting for uncertainty and leakage. 6. "Enforceable" means that the implementation of the GHG reduction activity must represent the legally binding commitment of the offset project developer to undertake and carry it out. The City has reviewed and determined that methodologies and protocols established by American Climate Registry, Climate Action Reserve, and Verra establish and require carbon offset projects to comply with standards designed to achieve additional, real, permanent, quantifiable, verifiable and enforceable reductions. Additionally, the "Reporting and Enforcement Standards" below shall ensure that the requirements of this mitigation measure will be enforced, as the City has authority to hold the applicant accountable and to take appropriate corrective action if it determines that any carbon offsets do not comply with the requirements herein.	

Table 1-1. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		Carbon offsets secured from the CARB-accredited registries shall be prioritized in accordance with the following criteria: (1) offsets within the City; (2) offsets within the County, only if in-City offsets are unavailable; (3) offsets within the State of California, only if in-county offsets are unavailable; (3) offsets within the United States, only if in-state offsets are unavailable.[6] The above definitions are provided as criteria and performance standards associated with the use of carbon offsets. Such criteria and performance standards are intended only to further construe the standards under CEQA for mitigation related to GHG emissions (see, e.g., State CEQA Guidelines Section 15126.4(a), (c)), and are not intended to apply or incorporate the requirements of any other statutory or regulatory scheme not applicable to the Project (e.g., the Cap-and-Trade Program). *Monitoring, Reporting and Enforcement Standards* Prior to the timeline identified in the initial section of this mitigation measure, the Project Applicant or its designee shall submit documentation in the form of a report to the City that identifies the quantity of emission reductions required by this mitigation measure, as well as the carbon offset proposed for acquisition to achieve compliance with this measure. For purposes of demonstrating that each offset is additional, real, permanent, quantifiable, verifiable and enforceable, the reports shall include: (i) the applicable protocol(s) and methodologies associated with the carbon	

[6] For purposes of this provision, offset credits will be deemed "unavailable" if they are either unobtainable generally from the CARB-accredited registries, or if on a per-unit basis if such a credit is otherwise available: (a) for offset credits within the City of Garden Grove, more than 2 times as costly as offset credits within the County of Orange, but not within the City of Garden Grove; (b) for offset credits within the County of Orange, more than 5 times as costly as offset credits within California, but not within the County of Orange; (c) for offset credits within the United State, sufficient offset credits within California are available for purchase at any cost.

Table 1-1. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		offsets, (ii) the third-party verification report(s) and statement(s) affiliated with the carbon offset projects, (iii) the unique serial numbers assigned by the registry(ies) to the carbon offset, which serves as evidence that the registry has determined the carbon offset project to have been implemented in accordance with the applicable protocol or methodology and ensures that the offsets cannot be further used in any manner, and (iv) the carbon offset meets the locational attributes as specified by this mitigation measure and verified through a market survey report prepared by a carbon offset broker that identifies the carbon registry listings reviewed for carbon offset availability, including the related date of inquiry. The Project Applicant (or its designee) shall select and retain at least one independent, third-party expert on GHG mitigation and offsets to review the documentation provided by the Applicant (or its designee) relating to, among other data, construction- and operation-related emissions, and provide a report with analysis and recommendations to the City (with supporting materials), on whether the Project has complied with the off-site GHG emissions reduction measures set forth in this mitigation measure. The Project Applicant's (or its designee's) selection of each expert, who shall not be a current or former employee or agent of the Project Applicant (or its designee), shall be subject to the approval of the City Attorney, which shall not be unreasonably withheld. The Project Applicant (or its designee) shall retain the expert(s) for all offset credit submissions made to the City until all offsets required this mitigation measure are acquired and accepted by the City. If the City determines that the Project's carbon offsets at issue in the Project Applicant's (or their designee's)	

Table 1-1. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		submission meet the requirements of this mitigation measure, the offsets required to be acquired by the Project will be proportionally reduced. Upon an affirmative finding from the City that the Project's carbon offsets are eligible for use under this measure, and within the applicable timeframe required by the first section of this mitigation measure, the Project applicant (or their designee) shall provide to the City copies of the relevant portions of the GHG offset contracts demonstrating the applicable carbon offsets have been acquired. This will serve as the final documentation required to demonstrate compliance with this mitigation measure. If the City determines that the Project's carbon offsets do not meet the requirements of this mitigation measure, the City shall provide a detailed explanation of the basis for the City's determination. Carbon offsets not approved by the City as meeting the requirements of this mitigation measure cannot be used to reduce Project GHG emissions and the Applicant will be required to submit qualifying carbon offsets accepted by the City prior to the applicable timeframe specified in the first section of this mitigation measure.	
Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.	Potentially Significant	The Project would implement the PDFs and MM GHG-1 through MM GHG-14.	Less Than Significant with Mitigation
Transportation			
Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).	Potentially Significant	**MM-TRA-1. Implement Commute Trip Reduction Marketing (T-7):** The Project applicant shall implement a marketing strategy to promote the Project site employer's Commute Trip Reduction (CTR) program. Information sharing and marketing promote and educate employees about their travel choices to the employment location beyond driving	Less Than Significant with Mitigation

Table 1-1. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		such as carpooling, taking transit, walking, and biking, thereby reducing VMT and GHG emissions. However, to ensure that CTR achieves VMT reduction of at least 4%, the following measures will be incorporated: a) The applicant shall provide on site or online commuter information services to employees. The applicant shall also distribute a quarterly newsletter with tips, success stories and updates to ensure education and encouragement for the CTR program. b) The CTR shall require the Project applicant or their designee to appoint a Commute Program Coordinator to oversee the implementation and management of the marketing strategy. c) The applicant shall ensure on-site or online subsidized transit pass sales are available to all employees. d) The applicant shall provide guaranteed ride home service by matching employees with other employees or providing access to platforms such as Rideharing.com and Lyft which connect riders for daily commutes with nearby drivers. e) A minimum of 10 preferential parking spaces for carpools/vanpools shall be provided.	

Table 1-1. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		MM-TRA-2. Provide End-of-Trip Bicycle Facilities (T-10): The Project shall install and maintain end-of-trip bicycle facilities for employee use. End-of-trip facilities include bike parking, bike lockers, showers, and personal lockers. The provision and maintenance of secure bike parking and related facilities encourages commuting by bicycle, thereby reducing VMT and GHG emissions. The Project design includes on-site bicycle racks to accommodate a minimum of 38 bicycle parking spaces and provide bicycle rentals for hotel guests on the ground level and 32 secure bicycle parking spaces and additionally, locker and shower facilities will be provided for employees.	

1.9 Summary of Project Alternatives

1.9.1 Alternative 1 – No Project Alternative

Under the No Project Alternative, development of the Project would not occur as discussed in Chapter 3, Project Description, of this Draft SEIR. The Project site would remain unchanged, and no development activity would occur. As a result, approval of the proposed Zone Change to Planned Unit Development and grading, building, and occupancy permits to develop the vacant and underutilized site would not be necessary, as no new development would occur on the Project site that would trigger such actions. Alternative 1 would have no visitor or workforce vehicle trips and would not generate GHG emissions compared to the proposed Project.

1.9.2 Alternative 2 – Reduced Project Alternative

The City considered an alternative that would result in the construction and operation of a development that is reduced in size. The size of this alternative project was selected based on its ability to avoid or substantially lessen the Project's significant impact. On this basis, the reduced project alternative would have an 85% reduction in total building square footage, resulting in 75 hotel rooms, and an 85% reduction in recreational water facilities (pool and lazy river) to serve the reduced hotel rooms. Other amenities such as the theater, larger meeting rooms, grand ballroom, arcade, and multiple restaurants would be eliminated due to size constraints imposed by the reduced project alternative. Similarly, with the limited square footage, retail, a single restaurant and other amenities like a spa and fitness facility included with the Project would either be substantially reduced due to size constraints or likely not practical because of the substantially reduced number of guests. As such, this hotel would be considered a limited-service hotel. As described in detail below, this reduced project alternative would avoid the proposed Project's significant GHG emissions impact. The reduced project alternative, however, would underutilize one of the larger undeveloped parcels in the City's IW land use designated area that allows a maximum floor area ratio (FAR) of 5.0. The reduced project alternative would result in an FAR of only approximately 0.75 on the 3.72-acre Project site. The smaller size of the reduced project alternative on such a relatively large site also likely makes the hotel operations and cost structure less efficient than a development like the Project where economies of scale and greater buying power create natural efficiencies.

Although total vehicle trips would decrease substantially under the reduced project alternative and VMT impacts would also be less than significant, guests of the reduced project alternative would likely drive more to other locations in the region for things such as meals and entertainment compared to the Project. The reduced project alternative would not be a destination in and of itself with substantial guest amenities and services. With the reduced amenities and services in the reduced project alternative, the alternative, in and of itself, would not provide tourists with enhanced overnight guest experiences with themed amenities attractive to families and other visitors.

Similarly, the size and limited features mean the reduced project alternative would be insufficient to entice a national or international theme park franchise arrangement and would instead be considered a limited-service hotel. According to industry data, theme park branded hotels typically range from many hundreds of rooms to more than several thousand whereas the reduced project alternative provides only 75 rooms. Because the reduced project would avoid the Project's potentially significant GHG impact and also have less than significant VMT impacts, however, the reduced project alternative was brought forward for analysis though it would not meet or only potentially partially meet most of the Project objectives.

1.9.3 Environmentally Superior Alternative

As indicated in Table 1-2, the No Project Alternative would result in the fewest environmental impacts and therefore would be considered the Environmentally Superior Alternative. However, the No Project Alternative would not meet any of the Project Objectives. Pursuant to CEQA Guidelines Section 15126.6(e)(2), if the No Project Alternative is the environmentally superior alterative, the EIR shall also identify an environmentally superior alternative among the other alternatives. As the analysis above demonstrates, Alternative 2, the reduced project alternative, would avoid or substantially lessen the potentially significant impacts of the Project. While Alternative 2 would avoid the significant and unavoidable GHG impacts of the Project and also result in less than significant VMT impacts, Alternative 2 does not meet or only partially meets most of the basic Project objectives, as discussed in Chapter 6, Alternatives, of this SEIR.

Table 1-2. Comparison of Project and Alternatives

Environmental Topic	Project Impact	Alternative 1 No Project	Alternative 2 Reduced Project
Greenhouse Gas Emissions	Significant and Unavoidable (Impact GHG-1)	No Impact	Less than Significant
	Less than Significant with Mitigation (Impact GHG-2)	No Impact	Less than Significant
Vehicle Miles Traveled	Less than Significant with Mitigation	No Impact	Less than Significant

INTENTIONALLY LEFT BLANK

2 Introduction

This chapter of the Supplemental Environmental Impact Report (SEIR) describes the purpose, scope, and legislative authority of the SEIR, the intent of the California Environmental Quality Act (CEQA) and other pertinent environmental rules and regulations, and the environmental review process. The section also includes the structure, required contents, and relationship of the SEIR to other potential responsible or trustee agencies.

2.1 Purpose and Scope

In 2022, the City Council and/or Successor Agency approved the Project. Those approvals included an amendment of PUD-141-01 establishing development standards for the Project ("PUD"), a Site Plan approval of the Project design, a Street Vacation, declaration of the intent to vacate and abandon Thackery Drive, adoption of a Mitigated Negative Declaration (MND) and Mitigation Monitoring and Reporting Program (MMRP) and approval of Disposition and Development Agreements addressing the conveyance and development of the Project site (collectively, "Approvals"). Following those approvals, a Notice of Determination was filed on August 24, 2022, with the County of Orange County Clerk. Those approvals were challenged in litigation filed in an Orange County Superior Court lawsuit challenging the City's MND. (*Perez et.al. v. City of Garden Grove et al.* OCSC Case No. 30-2022-01281816-CU-WM-CC.). That litigation led to the Court's entry of a Writ of Mandate, included as Appendix B hereto ("Writ").

Pursuant to the Writ, except as specified below, all claims challenging the 2022 approvals were dismissed with prejudice and the City and developer were directed to:

> (a) prepare a focused review under CEQA of the Project's or modified Project's potentially significant Vehicle Miles Travelled (VMT) and Greenhouse Gas (GHG) impacts; (b) assess whether modifications are needed to the Approvals, including any mitigation measures and conditions of approval, in light of that focused CEQA analysis; and (c) approve, approve with modifications, or deny the PUD in open session during a publicly agendized meeting of the City Council pursuant to Municipal Code section 9.32.030.

Further pursuant to the Writ, no further CEQA analysis of the Project is required with respect to the following CEQA topic areas:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation topics related to plan consistency, geometric design features hazards, and inadequate emergency access
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

CEQA contemplates the use of supplemental EIRs to make prior environmental documents adequate by addressing a confined set of issues. The project under consideration has not changed in any material way from the development analyzed in the MND that is the subject of the Writ. Thus, the City, as Lead Agency, has prepared this SEIR to comply with the Writ by evaluating and disclosing the potential GHG and VMT related environmental consequences of the proposed Project in accordance with CEQA.

2.2 Compliance with CEQA

2.2.1 Organization and Content of the SEIR

This SEIR is organized as follows:

Chapter 1, Executive Summary. This chapter provides a summary of the Project description, Alternatives to the proposed Project, environmental impacts, mitigation measures, and determination of significance of each impact.

Chapter 2. Introduction. This chapter briefly discusses the purpose of the Draft SEIR and provides a summary of the relevant CEQA Guidelines that govern the preparation of this SEIR. This chapter summarizes the scoping period and the comments received by the City on the Notice of Preparation (NOP) during the scoping process.

Chapter 3. Project Description. In accordance with Section 15124 of the State CEQA Guidelines, this chapter outlines the City's underlying purpose and objectives for the Project and includes a summary of the components of the Project. A discussion of discretionary actions needed to approve the Project, and a list of other public agencies expected to use the SEIR in their decision making are also included.

Chapter 4. Environmental Analysis. In accordance with Section 15126 of the State CEQA Guidelines, this chapter includes Section 4.1 and Section 4.2, consistent with the requirements outlined in the Writ. Each section includes the following: existing conditions of the Project site and vicinity, identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, mitigation measures (if any), level of significance after mitigation, and references. Chapter 4 includes the following sections:

- Section 4.1, Greenhouse Gas Emissions
- Section 4.2, Vehicle Miles Traveled

Chapter 5. Other CEQA Considerations. In accordance with Section 15126(c) and (d), this chapter contains a summary discussion of any effects found not to be significant, any significant and unavoidable impacts, potential growth-inducing impacts, and any significant irreversible environmental changes that would be caused by the Project.

Chapter 6. Alternatives. Pursuant to Section 15126.6 of the State CEQA Guidelines, this chapter includes an analysis of potential alternatives to the Project that would feasibly attain most of the basic objectives of the Project and avoid or substantially lessen any of the potentially significant effects of the Project.

Chapter 7. List of Preparers. This chapter lists the persons who directly contributed to preparation of the Draft SEIR.

2.2.2 Environmental Procedures

The basic purposes of CEQA are the following (CEQA Guidelines Section 15002(a)):

1. Inform governmental decision makers and the public about the potential significant environmental effects of proposed activities;
2. Identify the ways that environmental damage can be avoided or significantly reduced;
3. Prevent significant, unavoidable damage to the environment by requiring changes in the project through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
4. Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

This SEIR was prepared and is being circulated in response to the Writ issued in the litigation challenging the Project Approvals on CEQA grounds. Consistent with the Writ, this subsequent analysis evaluates potential GHG and VMT impacts.

2.2.2.1 Scoping

A Notice of Preparation (NOP) of the SEIR was circulated on April 18, 2025. The NOP was intended to encourage interagency communication concerning the proposed Project and provide sufficient background information about the proposed Project so that agencies, organizations, and individuals could respond with specific comments and questions on the scope and content of the SEIR within the context of the Writ. Pursuant to Section 15082 of the CEQA Guidelines, recipients of the NOP were requested to provide responses within 30 days after their receipt of the NOP. During the 30-day public review period of the NOP, the City held a Scoping Meeting on April 30, 2025, to gather additional public input. Copies of the NOP and the NOP distribution list are provided in Appendix A of this SEIR. All comments received during the NOP public notice period were considered during the preparation of this SEIR. Written comments received on the NOP are included in Appendix A of this SEIR.

The Project design has not materially changed and is within the scope of the previously adopted MND that is the subject of the Writ. Therefore, the previously approved MND is not being recirculated for public review nor does the SEIR analyze CEQA topic areas beyond those identified by the Writ. However, the SEIR includes an analysis of the following CEQA subjects that are not required when an agency prepares an MND: cumulative effects, a summary discussion of any significant unavoidable impacts, potential growth-inducing impacts, any significant irreversible environmental changes that would be caused by the Project, and alternatives to the proposed Project.

2.2.2.2 Public Review of Draft SEIR

The Draft SEIR will be made available for review to agencies and the public for 45 days to provide comments on the "sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the Project might be avoided or mitigated" (CEQA Guidelines Section 15204[a]).

During this public review period, written comments on the adequacy of the Draft SEIR can be submitted by all interested public agencies, organizations, community groups, and individuals to the following contact:

Monica Covarrubias, Senior Project Manager
City of Garden Grove
Economic Development and Housing Department
11222 Acacia Parkway
Garden Grove, California 92840
monicac@ggcity.org

The public review period shall run from September 22, 2025, through November 6, 2025. Comments must be received by 5:00 PM on November 6, 2025.

The SEIR is available for review online at the City's website: https://ggcity.org/planning/environmental-documents.

A physical copy of the SEIR is available at the Garden Grove City Hall for review during normal business hours at 11222 Acacia Parkway, Garden Grove, California, 92840.

2.2.2.3 Final SEIR

Following the close of the public comment period on the Draft SEIR, a Final SEIR will be prepared that will include all written comments received during the public review period, and responses to the comments that raise significant environmental issues related to the proposed Project. The Final SEIR may also include other revisions to the Draft SEIR and additional information as determined by the City.

As required by CEQA, written responses to comments submitted by public agencies will be provided to those agencies for review at least 10 days prior to the hearing on the Project required by the Writ. The City must certify the SEIR as complying with the requirements of CEQA and make specific findings regarding each potentially significant impact identified in the Final SEIR.

As the Lead Agency for the Project, the City is responsible for preparing this SEIR. The City Council will consider the SEIR and the relevant Project approvals as required by the Writ. As set forth in Section 15021 of the CEQA Guidelines, the City, as lead agency, has the duty to avoid or minimize environmental damage where feasible. Furthermore, Section 15021(d) states that:

> CEQA recognizes that in determining whether and how a Project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors and in particular the goal of providing a decent home and satisfying living environment for every Californian. An agency shall prepare a statement of overriding considerations as described in Section 15093 to reflect the ultimate balancing of competing public objectives when the agency decides to approve a Project that will cause one or more significant effects on the environment.

2.2.2.4 Adoption of Findings of Fact, Statement of Overriding Considerations, and Mitigation Monitoring and Reporting Program

CEQA requires that a program to monitor and report on mitigation measures be adopted by lead agencies as part of the project approval process. The Mitigation Monitoring and Reporting Program (MMRP) is prepared in

accordance with Section 21081.6 of the Public Resource Code. CEQA requires that such a program be adopted at the time the lead agency determines to carry out a project for which an EIR has been prepared, to ensure that mitigation measures identified in the EIR are implemented. The MMRP for the Project will be prepared during preparation of the Final SEIR to reflect any changes or revisions to mitigation measures made in response to public comments on the Draft SEIR.

The Final SEIR will be considered by the City prior to deciding whether to approve the proposed Project. If the City decides to approve the Project, as required by State CEQA Guidelines Section 15090, the City must first certify that the Final SEIR was completed in compliance with CEQA's requirements, was reviewed and considered by the City, and reflects its independent judgment and analysis. The City is then required to adopt findings of fact on the disposition of each significant environmental impact, as required by State CEQA Guidelines Section 15091. If significant and unavoidable impacts (those that cannot feasibly be mitigated to a less than significant level) would result from implementing the Project, the Project can still be approved, but the City must also adopt a "statement of overriding considerations" ("SOC"). The SOC requires public agencies to weigh a proposed project's benefits against its unavoidable environmental risks. The public agency may find the adverse impacts acceptable if the benefits outweigh the effects (PRC Section 21002; State CEQA Guidelines Section 15093).

2.2.3 Incorporated by Reference

The following documents are incorporated by reference within this SEIR:

City of Garden Grove. 2022. Final Initial Study/Mitigated Negative Declaration, Site B-2 Hotel (SCH No. 2022060174). August 2022.

Writ of Mandate entered on February 13, 2024 in *Perez et al. v. City of Garden Grove et al.* OCSC Case No. 30-2022-01281816-CU-WM-CC.

Other documents incorporated by reference in this SEIR, that relate solely to specific CEQA topic areas, are listed at the end of the respective discussions in Chapter 4, Chapter 5, and Chapter 6, where applicable, within this SEIR.

2.2.4 NOP Comments and Scoping Meeting

The NOP for the Project was published on April 18, 2025, which will thus be the environmental baseline for purposes of the SEIR's evaluation of the Project. The public review period for the NOP began on April 18, 2025 and ended on May 19, 2025. The agencies and organizations listed below commented on the NOP, and those comments can be found in Appendix A. During the 30-day public review period of the NOP, the City held a Scoping Meeting on April 30, 2025. Attendees at the Scoping Meeting all indicated support for the Project. Comments raised in comment letters during the 30-day scoping period are summarized in Table 2-1.

Table 2-1. NOP Comments

Commenter	Date	Comments
Lozeau Drury LLP	04/22/2025	This comment letter is written on behalf of Supporters for Environmental Responsibility (SAFER). The comment letter requests notice of any and all actions or hearings related to activities undertaken, authorized, approved, permitted, licensed, or certified by the City related to the Project.

Table 2-1. NOP Comments

Commenter	Date	Comments
Native American Heritage Commission	04/22/2025	This comment letter identifies that Assembly Bill (AB) 52 applies to a Project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015. The letter also transmits the guidelines and process for AB 52 Tribal Consultation. The AB 52 process for the Project was completed in 2022 in conjunction with the preparation and approval of the MND. As required by the Writ, the SEIR analyzed the Project's potential GHG and VMT impacts. Pursuant to the Writ, no further analysis regarding tribal cultural resources is required.
Pala Band of Mission Indians	04/24/2025	The Tribe wishes to defer to Tribes located in closer proximity to the Project area.
South Coast Air Quality Management District (SCAQMD)	05/16/2025	Although some of the comments exceed what the Writ and CEQA require for the SEIR, the following summarizes all the requests presented by SCAQMD. This comment letter requests that the SEIR be sent to SCAQMD upon release to the public. SCAQMD also requests all appendices and technical documents related to the air quality, health risk, and GHG analyses in electronic formats, including emission calculation spreadsheets, air quality modeling, and health risk assessment input and output files. SCAQMD requests that the City rely on the guidance provided in the South Coast AQMD's CEQA Air Quality Handbook and website when preparing the air quality and GHG analyses. SCAQMD requests that all phases of the Project and all air pollutant sources related to the Project, including from both construction and operation, be evaluated. In the event that the Project results in significant impacts, SCAQMD requests that mitigation measures from the CEQA Air Quality Handbook, South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2022 Air Quality Management Plan, and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy be incorporated. SCAQMD also requests that the Project: ▪ Maximize use of solar energy by installing solar energy arrays. ▪ Use light colored paving and roofing materials. ▪ Utilize only Energy Star heating, cooling, and lighting devices and appliances. ▪ Use water-based or low VOC cleaning products that go beyond the requirements of South Coast AQMD Rule 1113. SCAQMD also identifies several health risk reduction strategies that should be incorporated in the Project.

Table 2-1. NOP Comments

Commenter	Date	Comments
California Department of Transportation	05/19/2025	Caltrans requests that the Project applicant consider including a Transportation Demand Management (TDM) analysis within the SEIR, which should identify opportunities to minimize customer and employee VMT where possible, including but not limited to carpooling, transit incentives, schedule staggering, and support for bicycle accessibility. Caltrans also requests that appropriate detours, signage, and safety measures for pedestrians and bicyclists are used in the construction phase. Finally, Caltrans encourages the design of Complete Streets to promote regional connectivity, improve air quality, reduce congestion, and increase safety for all modes of transportation.
Law Office of Jordan R. Sisson	05/19/2025	The comment letter requests that the City should clarify what environmental review is being supplemented, that approvals required for the Project should be identified, and that the SEIR should include a robust analysis of GHG and VMT impacts, including consideration of all feasible mitigation measures. The comment letter also requests receipt of all notices concerning any CEQA/land use actions associated with the Project.

Source: Appendix A.

To the extent the issues raised in the comments fall within the scope of study required by the Writ, they have been fully addressed and analyzed in the SEIR.

INTENTIONALLY LEFT BLANK

3 Project Description

This chapter of the Draft Supplemental Environmental Impact Report (SEIR) provides a description of the proposed Site B-2 Hotel Project (Project), which is within the scope of the Project analyzed in the Mitigated Negative Declaration (MND) that is the subject of the Writ. The purpose of this chapter is to describe the Project in a manner that will be meaningful for review by the public, reviewing agencies, and decision-makers in accordance with CEQA the CEQA Guidelines and the Writ. Per the requirements of CEQA Guidelines Section 15124, a complete Project Description must contain the following information:

> (a) The precise location and boundaries of the proposed Project, shown on a detailed map, along with a regional map of the Project's location (see Section 3.1);
>
> (b) A statement of the objectives sought by the proposed Project, which should include the underlying purpose of the Project (see Section 3.3);
>
> (c) A general description of the Project's technical, economic, and environmental characteristics, considering the principal engineering documentation if any and supporting public service facilities (see Section 3.4); and
>
> (d) A statement briefly describing the intended uses of the EIR, including a list of the agencies that are expected to use the EIR in their decision making, a list of permits or other approvals required to implement the Project, and a list of related environmental review and consultation requirements imposed by federal, state, or local laws, regulations, or policies (see Sections 3.5 and 3.6).

In accordance with CEQA Guidelines Section 15124, the description of a project "should not supply extensive detail beyond that needed for evaluation and review of environmental impacts." This chapter of the Draft SEIR includes the required information, as listed above.

As stated in CEQA Guidelines Section 15126.2, and subject to the Writ, an EIR must identify and focus on the significant effects of a project on the environment. In assessing the impacts of a proposed project, the lead agency "should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published." (CEQA Guidelines Section 15125(a).)

The proposed Project involves the development of existing parcels with a new resort hotel. Pursuant to CEQA Guidelines Section 15123, this chapter describes the location, objectives, and characteristics of the proposed Project, followed by a statement describing the intended uses of this SEIR.

3.1 Project Location

The Project site is approximately 3.72 acres of land located at the northwest corner of Harbor Boulevard and Twintree Avenue, along the west and east sides of, and on, Thackery Drive in the City of Garden Grove. Regional access to the Project site is provided by State Route 22 and Interstate 5, as shown in Figure 3-1, Regional Location. Local access to the Project site is currently provided via Harbor Boulevard and Twintree Avenue. The Project site and surrounding area are shown in Figure 3-2, Project Location.

3.2 Environmental Setting

The existing Project site encompasses 3.72 acres of a previously disturbed site where the north/northeastern parcels of the Project site are paved and used for excess parking for the adjacent Sheraton Hotel, whereas the remaining parcels are dirt pads with limited vegetation that are vacant. The westerly portion of the former Thackery Drive road bed is still paved. The Project site is fenced and not accessible to the public. Demolition of the Project site's prior residential and commercial structures occurred between 2004 and 2013.

The Project site has a General Plan land use designation of International West Mixed Use (IW), as shown in Figure 3-3, General Plan Land Use Designation. The IW designation allows for a mix of uses, including resort, entertainment and hotel, that are appropriate for a major entertainment and tourism destination. The Project site is zoned as Planned Unit Development (PUD-141-01) and Single-Family Residential Zone (R-1-7). Approximately 2/3rds of the Project site is zoned PUD-141-01 and the western approximately 1/3rd of the project site is zoned R-1-7, as shown in Figure 3-4, Zoning.

The project site is located within a fully developed and urbanized area. The project site is bounded by the following uses and land use designations, as shown in Table 3-1, below, and Figure 3-3, General Plan Land Use Designation, and Figure 3-4, Zoning.

Table 3-1. Surrounding Land Uses and Designations

Direction from Site	Existing Land Use	General Plan Designation	Zoning Designation
North	Sheraton Hotel and associated paved parking areas	IW	PUD-141-01
Northwest	Multi-family apartments and associated paved parking areas	IW	R-3
East	Harbor Boulevard and vacant lots approved for hotel	IW	PUD-128-12
South	Twintree Avenue and commercial and residential uses	IW and Low Density Residential (LDR)	PUD-121-98 and R-1-7
West	Residential uses	IW and LDR	R-1-7

3.3 Project Objectives

The primary objectives of the proposed Project include the following:

- Design, develop, and construct a development on an underutilized property with all required infrastructure in the immediate proximity.
- Develop a destination hotel that incorporates sustainability features such as on-site solar energy, lower water use appliances and energy saving fixtures on a property within a transit priority area.
- Provide for an enhanced overnight guest experience with themed amenities attractive to families and other visitors who will use the project as a tourist destination location in and of itself.
- Develop a project that allows for efficient operations and logistics.
- Implement the project site's International West General Plan designation by including hotel, entertainment and resort elements to promote guest visits of multiple days.

- Develop a destination hotel in a location with convenient access to public transit and a shuttle system that connects the project to other tourist attractions in the area including those along the Harbor Boulevard Resort corridor.
- Support increased tourism in the City while also complementing other tourist destinations in surrounding communities.
- Generate a material amount of transient occupancy and property tax revenue for the City.
- Generate additional construction and operational jobs to support the local and regional economy.
- Develop a facility of sufficient size and with sufficient amenities to attract a partnership with a national or international theme park franchise.

3.4 Project Characteristics

3.4.1 Construction

Project construction would last approximately 30 months and be completed in a single phase. The construction and grading activities hours would comply with the noise limitation provisions set forth in the City of Garden Grove's Noise Ordinance, Garden Grove Municipal Code Sections 8.47.040 to 8.47.060, except that permitted hours and days of construction and grading will be as follows: Monday through Saturday – not before 7:00 a.m. and not after 8:00 p.m. (of the same day); and Sunday and Federal Holidays – may work the same hours, but be subject to the restrictions as stipulated in Sections 8.47.040 to 8.47.060 of the Municipal Code. Compliance with the permitted hours and days of construction and grading would be imposed as conditions of approval for the proposed Project. The maximum number of employees during construction would be 210 during the last six-month period of construction. Construction equipment used, and the durations for each of these pieces of equipment, is further detailed in Table 3-2, Construction Equipment Assumptions.

Table 3-2. Construction Equipment Assumptions

Construction Phase	Duration	Equipment		
		Equipment Type	Quantity	Usage Hours
Site Preparation	20 days	Rubber Tired Dozers	2	8
		Tractors/Loaders/ Backhoes	3	8
Site Grading	25 days	Graders	1	8
		Excavators	2	8
		Tractors/Loaders/ Backhoes	3	8
		Rubber Tired Dozers	3	8
		Compactor (Other Construction Equipment)	2	3
Building Construction	550 days	Forklifts	3	8
		Generator Sets	1	8
		Cranes	2	6
		Welders	1	8
		Tractors/Loaders/ Backhoes	3	8

Table 3-2. Construction Equipment Assumptions

Construction Phase	Duration	Equipment		
		Equipment Type	Quantity	Usage Hours
Paving	45 days	Tractors/Loaders/ Backhoes	1	8
		Cement and Mortar Mixers	2	6
		Pavers	2	8
		Paving Equipment	2	6
		Rollers	2	6
Architectural Coating	75 days	Air Compressors	6	6

Notes: No demolition is required for the Project as there are no structures on the Project site.

3.4.2 Operations

The proposed Project involves construction of a full-service high-rise (maximum height of 350 feet) resort hotel with hotel program entertainment/pool deck (height of approximately 61 feet) on a 3.72-acre site. The proposed hotel would include 500 guest suites with balconies; themed pool experience with lazy river; storage and loading area at 8,600 square feet maximum; event space with a 600-person maximum occupancy theater; a grand ballroom; two (2) meeting rooms, respectively; a variety of food and beverage opportunities to be placed throughout the hotel; themed amenities; an arcade; and a spa and fitness center, as shown in Table 3-3, Project Components. The proposed Project would also include a five-level (approximately 61 feet) parking garage with four levels above grade and one level below grade. A total of 528 spaces would be within the parking garage. All hotel amenities would be for the hotel guests use only. Figure 3-5, Ground Level Site Plan, includes the overall ground floor site plan of the proposed Project and Figure 3-6. Lower Level Site Plan, includes the below grade site plan.

Table 3-3. Project Components

Project Component	Summary
Project Site Area	3.72 acres
Hotel Rooms	500 keys
Hotel and Amenities	417,233 square feet
Parking Garage	301,686 square feet
Hotel Tower Maximum Height	350 feet
Hotel Program Entertainment/Pool Deck Height	60 feet, 7 inches
Total Building Area	718,919 square feet
Total Parking Spaces	528

To accommodate the proposed development, the Project also includes vacation of a public street (Thackery Drive) and public alley located entirely within the site.

3.4.3 Project Design Features

The following summarizes the Project Design Features (PDFs) that are incorporated into the Project relative to the analysis in this SEIR and that will be included in the conditions of approval and/or MMRP. It should be noted that

all the following PDFs are qualitative/supporting measures. Therefore, for purposes of quantifying the Project's GHG emissions, no GHG reductions were taken from implementation of these measures.

3.4.3.1 Construction

PDF-4 Construction equipment should be maintained in proper tune.

PDF-5 All construction vehicles should be prohibited from excessive idling. Excessive idling is defined as five (5) minutes or longer.

PDF-8 Establish an electricity supply to the construction site and use electric powered equipment instead of diesel-powered equipment or generators, where feasible.

PDF-10 Use haul trucks with on-road engines instead of off-road engines for on-site hauling.

3.4.3.2 Operations

PDF-11 The Project should comply with the mandatory requirements of the latest California Building Standards Code, Title 24, Part 6 (Energy Code) and Part 11 (California Green Building Standards Code [CALGreen]), including the provisions for bicycle parking, electric vehicle charging stations, energy efficiency, material conservation, and water/waste reduction.

PDF-12 Install signage at loading docks requiring trucks to limit engine idling times to 5 minutes or less.

PDF-21 Engine idling time for all delivery vehicles and trucks must be limited to 5 minutes or less. Signage should be posted in the designated loading areas reflecting the idling restrictions.

3.5 Intended Uses of the SEIR

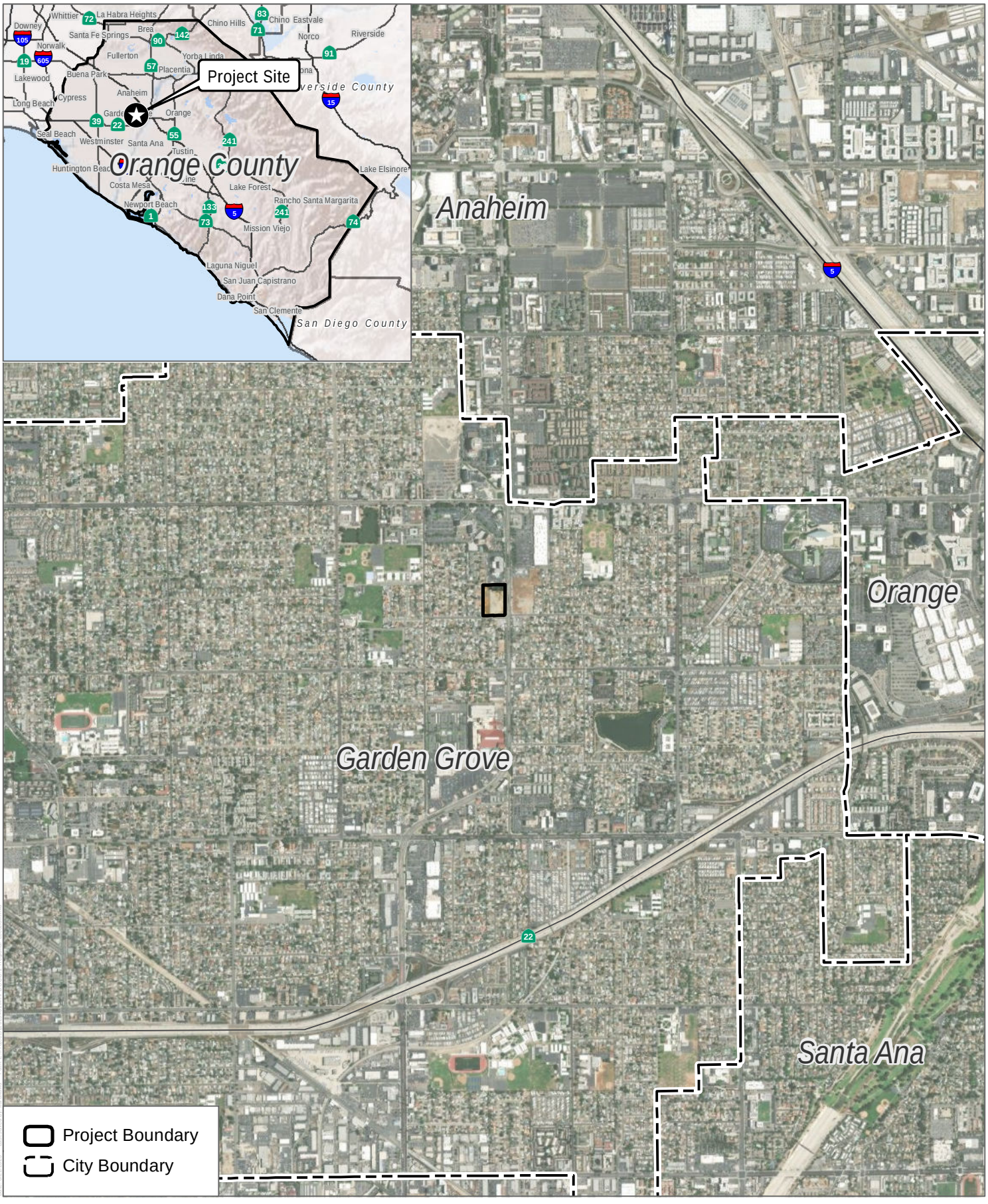
CEQA contemplates the use of supplemental EIRs to make prior environmental documents adequate by addressing a confined set of issues. Thus, the SEIR has been prepared to comply with the Writ by evaluating the Project's potentially significant GHG and VMT impacts. As an informational document, a SEIR does not make recommendations for or against a Project. The main purpose of a SEIR is to inform public agency decision makers and the public about potential environmental impacts of a project. This SEIR will be used by the City, as the lead agency under CEQA, to comply with the Writ.

3.6 Required Project Approvals

The City is the lead agency for the proposed Project pursuant to CEQA Guidelines Section 15367. The proposed Project may require a number of permits and approvals by the City, including the following:

- Certification of the SEIR
- Adoption of Findings of Fact and Statement of Overriding Considerations
- Adoption of Mitigation Monitoring and Reporting Program
- Approval of Zone Change to subzone Planned Unit Development No. PUD-141-01(A)
- Approval of Grading Permits

- Approval of Building and Occupancy Permits
- Approval of Final Water Quality Management Plan and Stormwater Pollution Prevention Plan (SWPPP)
- Other related approvals as specified during the entitlement process



SOURCE: Bing Maps 2021, USGS Topographic Basemap, PG&E 2021, Open Street Map 2021

DUDEK

0 1,000 2,000 Feet

FIGURE 3-1

Regional Location

Site B-2 Hotel Project

INTENTIONALLY LEFT BLANK

SOURCE: Bing Maps 2021, USGS Topographic Basemap, PG&E 2021, Open Street Map 2021

DUDEK

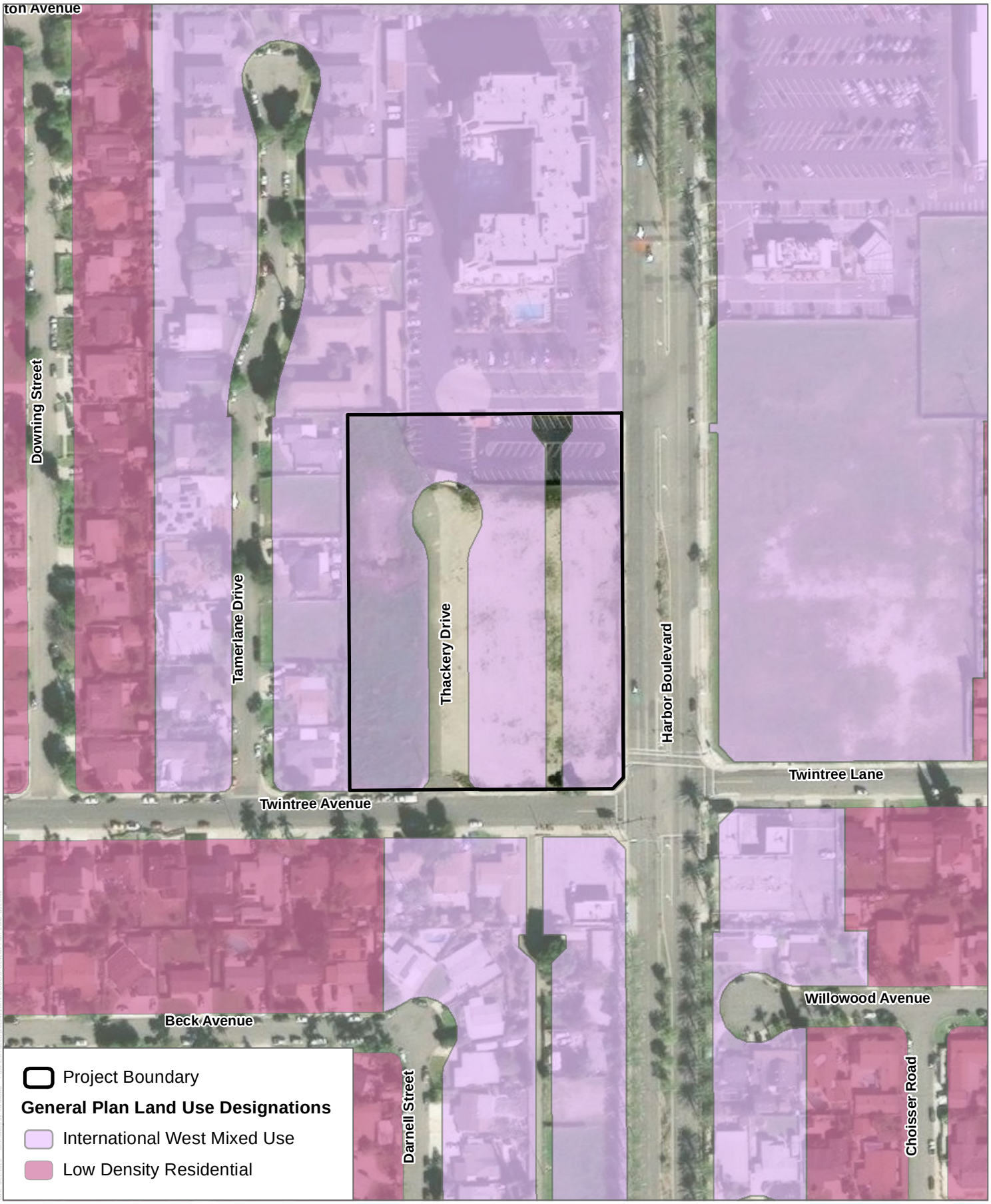
0 80 160 Feet

FIGURE 3-2

Project Location

Site B-2 Hotel Project

INTENTIONALLY LEFT BLANK



SOURCE: Bing Maps 2021, USGS Topographic Basemap, PG&E 2021, Open Street Map 2021, City of Garden Grove (2025)

DUDEK

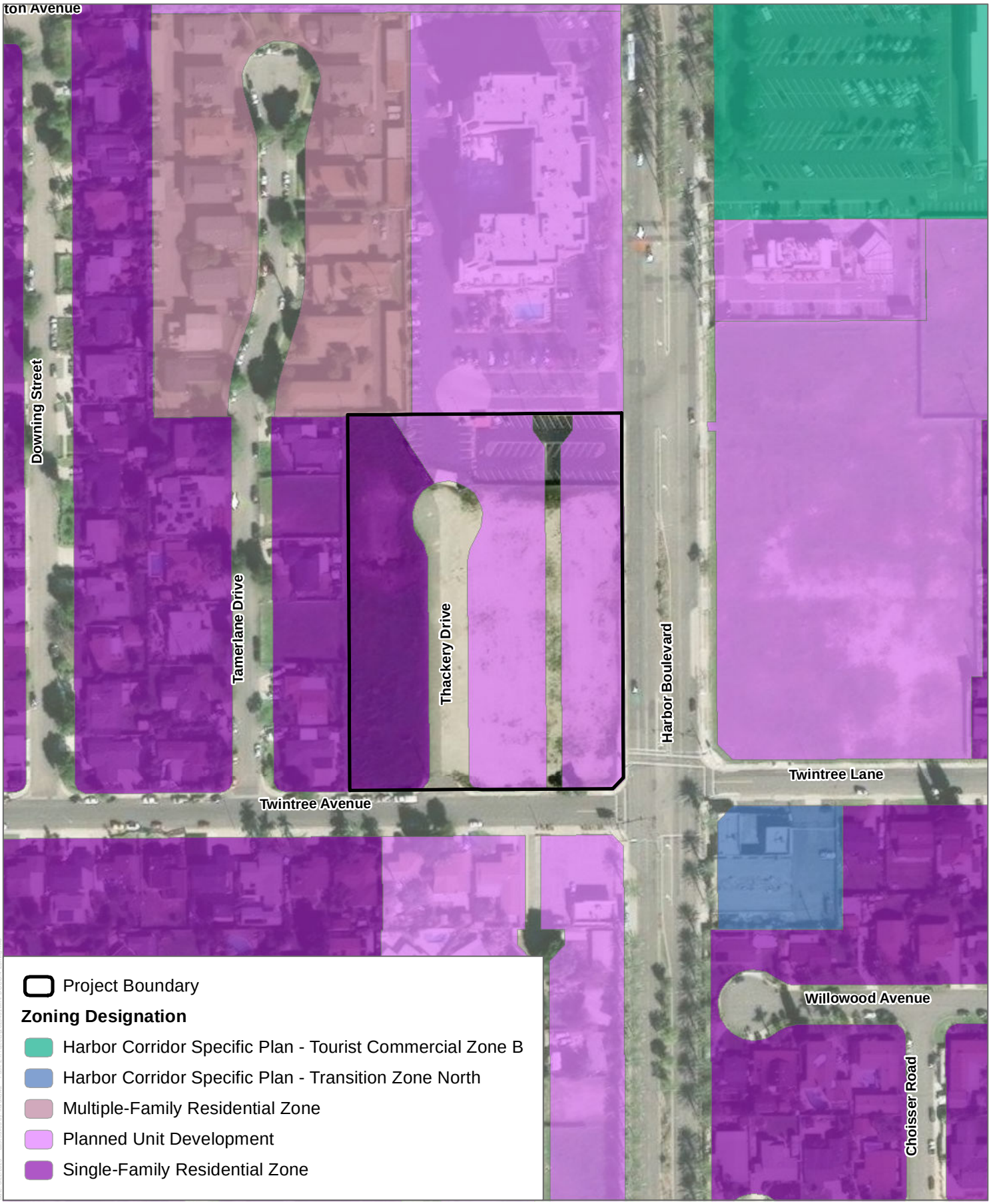
0 80 160 Feet

FIGURE 3-3

General Plan Land Use Designation

Site B-2 Hotel Project

INTENTIONALLY LEFT BLANK



SOURCE: Bing Maps 2021, USGS Topographic Basemap, PG&E 2021, Open Street Map 2021, City of Garden Grove (2025)

DUDEK

0 80 160 Feet

FIGURE 3-4

Zoning

Site B-2 Hotel Project

INTENTIONALLY LEFT BLANK

SOURCE: Kam Sang Company

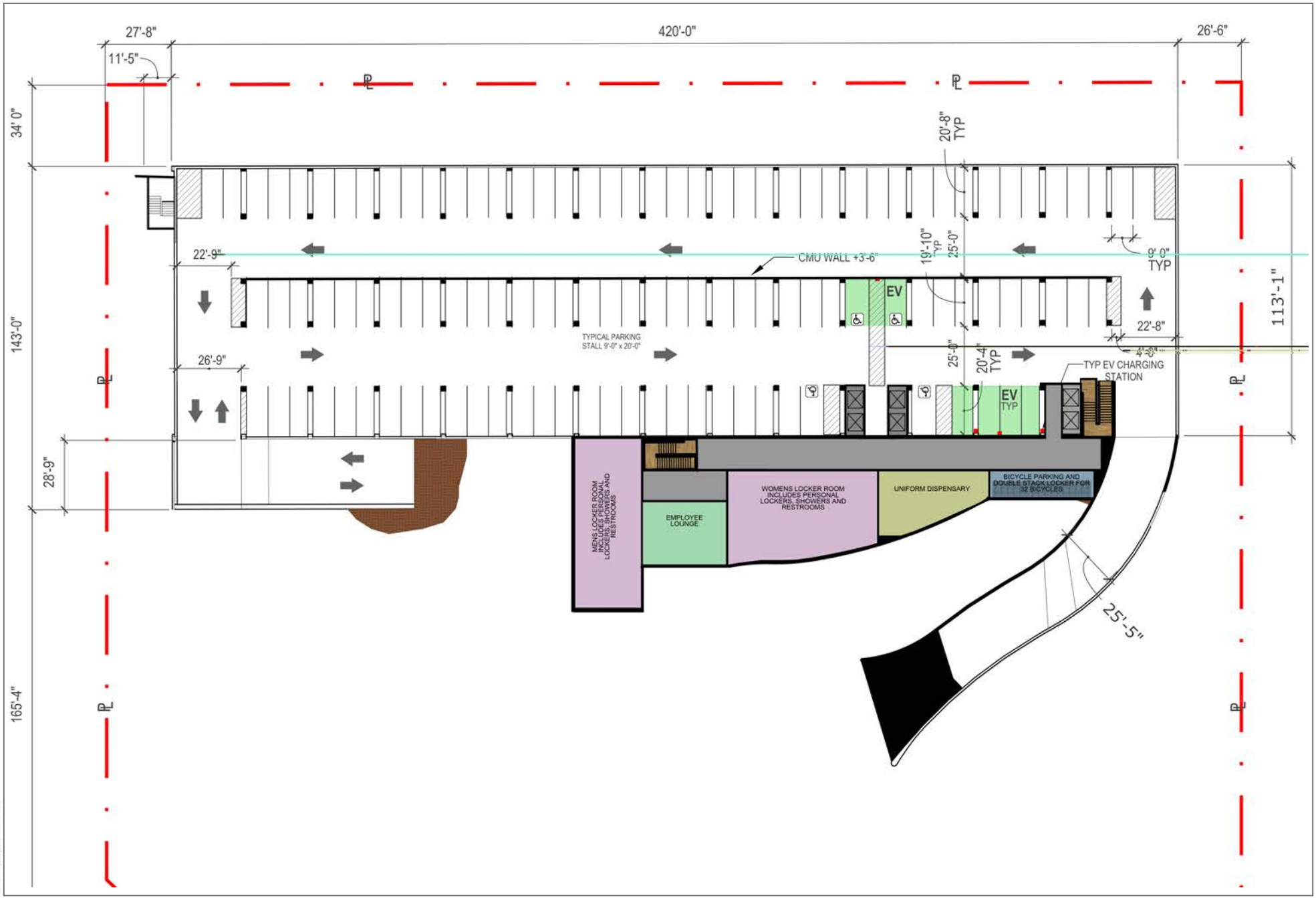
DUDEK N

FIGURE 3.5

Ground Level Site Plan

Site B-2 Hotel Project

INTENTIONALLY LEFT BLANK



SOURCE: Kam Sang Company

FIGURE 3-6

Lower Level Site Plan

Site B-2 Hotel Project

DUDEK N

INTENTIONALLY LEFT BLANK

4 Environmental Analysis Introduction

The purpose of this Chapter 4 of the Supplemental Environmental Impact Report (SEIR) is to evaluate the potential environmental effects of the proposed Site B-2 Hotel Project (Project) in accordance with the requirements of the Writ and the California Environmental Quality Act (CEQA). Full buildout of the Project, as discussed throughout Chapter 3, Project Description, of the SEIR, is assumed in the analysis herein.

The City of Garden Grove (City) circulated a Notice of Preparation (NOP) beginning on April 18, 2025, with the public review period ending on May 19, 2025. The NOP was transmitted to the State Clearinghouse, responsible agencies, other affected agencies, and interested parties to solicit issues or potential environmental effects related to the Project. The NOP and comment letters are contained in Appendix A and a summary of comments received during the scoping period are included in Table 2-1 within Chapter 2, Introduction, of this SEIR. Consistent with the requirements of the Writ, the analysis within this Chapter of the SEIR is focused on the following:

- Section 4.1. Greenhouse Gas Emissions
- Section 4.2. Vehicle Miles Traveled

Technical Studies

Technical studies were prepared in order to analyze potential greenhouse gas (GHG) emissions and vehicle miles traveled (VMT) impacts and were used in the preparation of this SEIR. These documents are identified in the discussions for the individual environmental issues and included as technical appendices to the SEIR. Hard copies of the technical studies are available at the City and will also be available on the City's website at https://ggcity.org/planning/environmental-documents.

Analysis Format

The SEIR assesses how the Project would impact the issue areas of GHG emissions and VMT. Each environmental issue addressed in this SEIR is presented in the following subsections:

- **Existing Conditions**: Provides information describing the existing setting on or surrounding the Project site that may be subject to change as a result of implementation of the Project. This setting discussion describes the conditions that existed when the NOP was sent to responsible agencies and the State Clearinghouse.
- **Relevant Regulations, Plans, Policies, and Ordinances**: Provides a discussion of federal, state, regional, and local regulations, plans, policies, and ordinances applicable to the Project.
- **Project Design Features:** Where applicable, features of the Project that are incorporated into the Project design that reduce or avoid potential environmental impacts are identified.
- **Thresholds of Significance**: Provides criteria for determining the significance of Project impacts for each environmental topic.
- **Impact Analysis**: Provides a discussion of the characteristics of the Project that may have an effect on the environment, analyzes the nature and extent to which the Project is expected to change the existing environment, and indicates whether the Project impacts meet or exceed the levels of significance thresholds. Project-related impact analysis is based on the assumptions detailed in Chapter 3, which include, but are not limited to, discussion on the following: existing baseline conditions, Project components, and Project construction assumptions.

- **Mitigation Measures**: Identifies mitigation measures to reduce significant adverse impacts to the extent feasible.
- **Level of Significance After Mitigation**: Provides a discussion of significant adverse environmental impacts that cannot be feasibly mitigated or avoided, significant adverse environmental impacts that can be feasibly mitigated or avoided, adverse environmental impacts that are not significant, and beneficial impacts.
- **Cumulative Effects**: Provides a discussion of cumulative environmental effects of the proposed Project in combination with related projects as well as the Project's contribution to cumulative impacts.
- **References Cited**: Provides a list of references and documents cited within the section and incorporated into the SEIR by reference.

Cumulative Effects Analysis Methodology

Section 15130(b)(1)(A) of the California Environmental Quality Act (CEQA) Guidelines (14 CCR 15000 et seq.) allows for the preparation of a list of past, present, and reasonably anticipated future projects as a viable method of determining cumulative impacts. As discussed in Section 4.1, Greenhouse Gas Emissions, for cumulative GHG emission impacts, GHG emissions are inherently cumulative in nature so all additional GHG emissions are evaluated for the potential to have cumulative impacts. Cumulative impacts are evaluated for significance against the 1,400 MT CO_2e GHG emissions threshold established by the South Coast Air Quality Management District and against applicable GHG reduction plans, policies and regulations. For VMT impacts, as discussed in Section 4.2, Transportation, of this SEIR, per the Cumulative Effects on Impacts in the Technical Advisory (Governor's Office of Planning and Research [OPR] 2018), "A project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact."

Section 15130(b)(3) of the CEQA Guidelines states that "lead agencies shall define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used." Unless otherwise indicated in the analysis in Chapter 4 of this SEIR, the geographic scope used in the cumulative analysis includes the global context for GHG emissions and the Southern California Association of Governments (SCAG) region for VMT impacts.

Table 4-1 describes the geographic scope of cumulative impact analysis for each environmental resource category, as well as the method of evaluation for each category.

Table 4-1. Geographic Scope and Method of Evaluation for Cumulative Impacts

Environmental Resource	Geographic Area	Method of Evaluation
Greenhouse Gas Emissions	Global	Exceedance of Established Thresholds; Plan, Policy and Regulation Consistency
VMT	Regional	Efficiency-Based Threshold

References Cited

OPR (Governor's Office of Planning and Research). 2018. Technical Advisory on Evaluating Transportation Impacts in CEQA. http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.

4.1 Greenhouse Gas Emissions

As described in Section 2.0 Introduction, in compliance with the stipulated Writ of Mandate (Writ) and pursuant to CEQA Guidelines Section 15163, the City is preparing a SEIR to evaluate the greenhouse gas (GHG) emissions and vehicle miles traveled (VMT) impacts of the Project. Pursuant to the Writ, all other claims related to the Project and compliance with CEQA with respect to the Project and the approvals related to the same, that were or could have been raised, were released and dismissed with prejudice.

This section describes the existing conditions of the project site and vicinity related to greenhouse gas (GHG) emissions, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed Project.

Information in this section is obtained from the Greenhouse Gas Emissions Technical Report included as Appendix C to this Draft SEIR.

4.1.1 Existing Conditions

This section discusses the existing environmental setting relative to GHG emissions. For purposes of existing conditions for GHG emissions, it considers the scientific basis of GHG emissions and climate change with a global consideration.

4.1.1.1 Climate Change Overview

Climate change refers to any significant change in measures of climate, such as temperature, precipitation, or wind patterns, lasting for an extended period (i.e., decades or longer). The Earth's temperature depends on the balance between energy entering and leaving the planet's system. Many factors, both natural and human, can cause changes in Earth's energy balance, including variations in the sun's energy reaching Earth, changes in the reflectivity of Earth's atmosphere and surface, and changes in the greenhouse effect, which affects the amount of heat retained by Earth's atmosphere (EPA 2023a).

The greenhouse effect is the trapping and build-up of heat in the atmosphere (troposphere) near the Earth's surface. The greenhouse effect traps heat in the troposphere through a threefold process as follows: Short-wave radiation emitted by the Sun is absorbed by the Earth, the Earth emits a portion of this energy in the form of long-wave radiation, and GHGs in the upper atmosphere absorb this long-wave radiation and emit it into space and toward the Earth. The greenhouse effect is a natural process that contributes to regulating the Earth's temperature and creates a pleasant, livable environment on the Earth. Human activities that emit additional GHGs to the atmosphere increase the amount of infrared radiation that gets absorbed before escaping into space, thus enhancing the greenhouse effect and causing the Earth's surface temperature to rise.

The scientific record of the Earth's climate shows that the climate system varies naturally over a wide range of time scales and that, in general, climate changes prior to the Industrial Revolution in the 1700s can be explained by natural causes such as changes in solar energy, volcanic eruptions, and natural changes in GHG concentrations. Recent climate changes, in particular the warming observed over the past century, however, cannot be explained by natural causes alone. Rather, it is extremely likely that human activities have been the dominant cause of that warming since the mid-twentieth century and is the most significant driver of observed climate change (IPCC 2013; EPA 2023a). Human influence on the climate system is evident from the increasing GHG concentrations in the

atmosphere, positive radiative forcing, observed warming, and improved understanding of the climate system (IPCC 2013). The atmospheric concentrations of GHGs have increased to levels unprecedented in the last 800,000 years, primarily from fossil fuel emissions and secondarily from emissions associated with land use changes (IPCC 2013). Continued emissions of GHGs will cause further warming and changes in all components of the climate system, which is discussed further in "Potential Effects of Climate Change".

4.1.1.2 Greenhouse Gases

A GHG is any gas that absorbs infrared radiation in the atmosphere; in other words, GHGs trap heat in the atmosphere. As defined in California Health and Safety Code, Section 38505(g), for purposes of administering many of the state's primary GHG emission reduction programs, GHGs include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3). (See also CEQA Guidelines, Section 15364.5.) Some GHGs, such as CO_2, CH_4, and N_2O, occur naturally and are emitted into the atmosphere through natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Manufactured GHGs, which have a much greater heat-absorption potential than CO_2, include fluorinated gases, such as HFCs, PFCs, and SF_6, which are associated with certain industrial products and processes. The following paragraphs provide a summary of the most common GHGs and their sources.[1]

Carbon Dioxide. CO_2 is a naturally occurring gas and a by-product of human activities and is the principal anthropogenic (i.e., caused by human activity) GHG that affects the Earth's radiative balance. Natural sources of CO_2 include respiration of bacteria, plants, animals, and fungus; evaporation from oceans; volcanic out-gassing; and decomposition of dead organic matter. Human activities that generate CO_2 are the combustion of fuels such as coal, oil, natural gas, and wood and changes in land use.

Methane. CH_4 is produced through both natural and human activities. CH_4 is a flammable gas and is the main component of natural gas. CH_4 is produced through anaerobic (without oxygen) decomposition of waste in landfills, flooded rice fields, animal digestion, decomposition of animal wastes, production and distribution of natural gas and petroleum, coal production, and incomplete fossil fuel combustion.

Nitrous Oxide. N_2O is produced through natural and human activities, mainly through agricultural activities and natural biological processes, although fuel burning and other processes also create N_2O. Sources of N_2O include soil cultivation practices (microbial processes in soil and water), especially the use of commercial and organic fertilizers, manure management, industrial processes (such as in nitric acid production, nylon production, and fossil-fuel-fired power plants), vehicle emissions, and using N_2O as a propellant (e.g., rockets, racecars, and aerosol sprays).

Fluorinated Gases. Fluorinated gases (also referred to as F-gases) are synthetic powerful GHGs emitted from many industrial processes. Fluorinated gases are commonly used as substitutes for stratospheric O_3-depleting substances (e.g., chlorofluorocarbons [CFCs], hydrochlorofluorocarbons [HCFCs], and halons). The most prevalent fluorinated gases include the following:

[1] The descriptions of GHGs are summarized from the Intergovernmental Panel on Climate Change (IPCC) Second Assessment Report (1995), IPCC Fourth Assessment Report (2007), CARB's "GHG Inventory Glossary" (2024a), and EPA's "Glossary of Climate Change Terms" (2024).

- **Hydrofluorocarbons:** HFCs are compounds containing only hydrogen, fluorine, and carbon atoms. HFCs are synthetic chemicals used as alternatives to O_3-depleting substances in serving many industrial, commercial, and personal needs. HFCs are emitted as by-products of industrial processes and are used in manufacturing.
- **Perfluorocarbons:** PFCs are a group of human-made chemicals composed of carbon and fluorine only. These chemicals were introduced as alternatives, with HFCs, to the O_3-depleting substances. The two main sources of PFCs are primary aluminum production and semiconductor manufacturing. Since PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere, these chemicals have long lifetimes, ranging between 10,000 and 50,000 years.
- **Sulfur Hexafluoride:** SF_6 is a colorless gas soluble in alcohol and ether and slightly soluble in water. SF_6 is used for insulation in electric power transmission and distribution equipment, semiconductor manufacturing, the magnesium industry, and as a tracer gas for leak detection.
- **Nitrogen Trifluoride:** NF_3 is used in the manufacture of a variety of electronics, including semiconductors and flat panel displays.

Chlorofluorocarbons. CFCs are synthetic chemicals that have been used as cleaning solvents, refrigerants, and aerosol propellants. CFCs are chemically unreactive in the lower atmosphere (troposphere) and the production of CFCs was prohibited in 1987 due to the chemical destruction of stratospheric O_3.

Hydrochlorofluorocarbons. HCFCs are a large group of compounds, whose structure is very close to that of CFCs—containing hydrogen, fluorine, chlorine, and carbon atoms—but including one or more hydrogen atoms. Like HFCs, HCFCs are used in refrigerants and propellants. HCFCs were also used in place of CFCs for some applications; however, their use in general is being phased out.

Black Carbon. Black carbon is a component of fine PM, which has been identified as a leading environmental risk factor for premature death. It is produced from the incomplete combustion of fossil fuels and biomass burning, particularly from older diesel engines and forest fires. Black carbon warms the atmosphere by absorbing solar radiation, influences cloud formation, and darkens the surface of snow and ice, which accelerates heat absorption and melting. Black carbon is a short-lived species that varies spatially, which makes it difficult to quantify the global warming potential (GWP). DPM emissions are a major source of black carbon and are TACs that have been regulated and controlled in California for several decades to protect public health. In relation to declining DPM from the CARB regulations pertaining to diesel engines, diesel fuels, and burning activities, CARB estimates that annual black carbon emissions in California have reduced by 70% between 1990 and 2010, with 95% control expected by 2020 (CARB 2014).

Water Vapor. The primary source of water vapor is evaporation from the ocean, with additional vapor generated by sublimation (change from solid to gas) from ice and snow, evaporation from other water bodies, and transpiration from plant leaves. Water vapor is the most important, abundant, and variable GHG in the atmosphere and maintains a climate necessary for life.

Ozone. Tropospheric O_3, which is created by photochemical reactions involving gases from both natural sources and human activities, acts as a GHG. Stratospheric O_3, which is created by the interaction between solar ultraviolet radiation and molecular oxygen (O_2), plays a decisive role in the stratospheric radiative balance. Depletion of stratospheric O_3, due to chemical reactions that may be enhanced by climate change, results in an increased ground-level flux of ultraviolet-B radiation.

Aerosols. Aerosols are suspensions of PM in a gas emitted into the air through burning biomass (plant material) and fossil fuels. Aerosols can warm the atmosphere by absorbing and emitting heat and can cool the atmosphere by reflecting light.

4.1.1.3 Global Warming Potential

Gases in the atmosphere can contribute to climate change both directly and indirectly. Direct effects occur when the gas itself absorbs radiation. Indirect radiative forcing occurs when chemical transformations of the substance produce other GHGs, when a gas influences the atmospheric lifetimes of other gases, and/or when a gas affects atmospheric processes that alter the radiative balance of the Earth (e.g., affect cloud formation or albedo) (EPA 2023b). The Intergovernmental Panel on Climate Change (IPCC) developed the GWP concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP of a GHG is defined as the ratio of the time-integrated radiative forcing from the instantaneous release of 1 kilogram of a trace substance relative to that of 1 kilogram of a reference gas (IPCC 2014). The reference gas used is CO_2; therefore, GWP-weighted emissions are measured in metric tons (MT) of CO_2 equivalent (CO_2e).

4.1.1.4 Sources of Greenhouse Gas Emissions

A GHG emissions inventory is a snapshot of the GHG emissions within a geographic boundary during a given period. Per the U.S. Environmental Protection Agency's (EPA's) Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2022, total United States GHG emissions were approximately 6,343 million metric tons (MMT) CO_2e in 2022 (EPA 2024b). Total U.S. emissions have decreased by 3% from 1990 to 2022, down from a high of 15.2% above 1990 levels in 2007. Emissions increased from 2021 to 2022 by 0.2% (14.4 MMT CO_2e). Net emissions (i.e., including sinks) were 5,489.0 MMT CO_2e in 2022. Overall, net emissions increased 1.3% from 2021 to 2022 and decreased 16.7% from 2005 levels. Between 2021 and 2022, the increase in total GHG emissions was driven largely by an increase in CO_2 emissions from fossil fuel combustion due to economic activity rebounding after the height of the COVID-19 pandemic. The CO_2 emissions from fossil fuel combustion increased by 1% from 2021 to 2022 and were 1.1% below 1990 emissions levels. Natural gas use increased by 5.2% (84.8 MMT CO_2e) between 2021 and 2022 while CO_2 emissions from coal consumption decreased by 6.1% (58.6 MMT CO_2e). The increase in natural gas consumption was seen across all U.S. territories while the decrease in coal was due to reduced use in the electric power sector. Emissions from petroleum use increased by 0.9% (19.0 MMT CO_2e) from 2021 to 2022. Carbon sequestration from the Land Use, Land Use Change, and Forestry (LULUCF) sector offset 14.5% (67.6 MMT CO_2e) of total emissions in 2022.

According to California's 2000–2022 GHG emissions inventory (2024 edition), California emitted approximately 371.1 MMT CO_2e in 2022, including emissions resulting from out-of-state electrical generation (CARB 2024d). The sources of GHG emissions in California include transportation, industry, electric power production from both in-state and out-of-state sources, residential and commercial activities, agriculture, high-GWP substances, and recycling and waste. As shown, as of 2022, transportation represents 37.7% of the total percentage of annual GHG emissions in California. Table 2-1 presents California GHG emission source categories and their relative contributions to the emissions inventory in 2022.

Table 4.1-1. Greenhouse Gas Emissions Sources in California

Source Category	Annual GHG Emissions (MMT CO_2e)[a]	Percent of Total[a]
Transportation	139.9	37.69%
Industrial	72.7	19.59%

Table 4.1-1. Greenhouse Gas Emissions Sources in California

Source Category	Annual GHG Emissions (MMT CO_2e)[a]	Percent of Total[a]
Electric power	59.8	16.11%
Commercial and Residential	39.5	10.64%
Agriculture	29.8	8.03%
High global-warming potential substances	21.3	5.74%
Recycling and waste	8.2	2.21%
Total	**371.1**	**100%**

Source: CARB 2024
Notes: GHG = greenhouse gas; MMT CO_2e = million metric tons of carbon dioxide equivalent.
Emissions reflect the 2022 California GHG inventory by Scoping Plan Category (CARB 2022h).
[a] Percentage of total and annual GHG emissions have been rounded, and total may not sum due to rounding.

The most recent GHG emissions data by sector for the Southern California Association of Governments (SCAG) region is from 2012 for base year 2008 (SCAG 2012). Total SCAG region emissions in 2008 were 230.7 MMT CO_2e. The principal sources of SCAG's GHG emissions are transportation; electricity consumption, and residential, commercial, and industrial (RCI) fuel use accounting for 40%, 25%, and 16% of SCAG's gross GHG emissions in 2008, respectively (SCAG 2012).

4.1.1.4 Potential Effects of Climate Change

Globally, climate change has the potential to affect numerous environmental resources through uncertain impacts related to future air temperatures and precipitation patterns. The 2014 IPCC Synthesis Report (IPCC 2014) indicated that warming of the climate system is unequivocal, and since the 1950s, many of the observed changes are unprecedented over decades to millennia. Signs that global climate change has occurred include warming of the atmosphere and ocean, diminished amounts of snow and ice, rising sea levels, and ocean acidification (IPCC 2014).

In California, climate change impacts have the potential to affect sea-level rise, agriculture, snowpack and water supply, forestry, wildfire risk, public health, frequency of severe weather events, and electricity demand and supply. The primary effect of global climate change has been a rise in average global tropospheric temperature. Global surface temperature in the first two decades of the twenty-first century (2001–2020) was 0.99 [0.84 to 1.10]°C higher than 1850–1900 (IPCC 2023). Global surface temperature has increased faster since 1970 than in any other 50-year period over at least the last 2000 years (IPCC 2023). Scientific modeling predicts that continued emissions of GHGs at or above current rates would induce more extreme climate changes during the twenty-first century than were observed during the twentieth century. Human activities, principally through emissions of GHGs, have unequivocally caused global warming, with global surface temperature reaching 1.1°C above 1850-1900 in 2011-2020 (IPCC 2023).

Although climate change is driven by global atmospheric conditions, climate change impacts are felt locally. A scientific consensus confirms that climate change is already affecting California. OEHHA identified various indicators of climate change in California, which are scientifically based measurements that track trends in various aspects of climate change. Many indicators reveal discernible evidence that climate change is occurring in California and is having significant, measurable impacts in the state. Changes in the state's climate have been observed including an increase in annual average air temperature, more frequent extreme heat events, more extreme drought, a decline in winter chill, an increase in cooling degree days and a decrease in heating degree days, and an increase in variability of statewide precipitation (OEHHA 2022).

Warming temperatures and changing precipitation patterns have altered California's physical systems—the ocean, lakes, rivers and snowpack—upon which the state depends. Winter snowpack and spring snowmelt runoff from the Sierra Nevada and southern Cascade Mountains provide approximately one-third of the state's annual water supply. Impacts of climate on physical systems have been observed such as high variability of snow-water content (i.e., amount of water stored in snowpack), decrease in spring snowmelt runoff, glacier change (loss in area), rise in sea levels, increase in average lake water temperature and coastal ocean temperature, and a decrease in dissolved oxygen in coastal waters (OEHHA 2022).

Impacts of climate change on biological systems, including humans, wildlife, and vegetation, have also been observed including climate change impacts on terrestrial, marine, and freshwater ecosystems. As with global observations, species responses include those consistent with warming: elevational or latitudinal shifts in range, changes in the timing of key plant and animal life cycle events, and changes in the abundance of species and in community composition. Humans are better able to adapt to a changing climate than plants and animals in natural ecosystems. Nevertheless, climate change poses a threat to public health as warming temperatures and changes in precipitation can affect vector-borne pathogen transmission and disease patterns in California as well as the variability of heat-related deaths and illnesses. In addition, since 1950, the area burned by wildfires each year has been increasing.

The California Natural Resources Agency (CNRA) has released four California Climate Change Assessments (in 2006, 2009, 2012, and 2018), which have addressed the following: acceleration of warming across the state, more intense and frequent heat waves, greater riverine flows, accelerating sea level rise, more intense and frequent drought, more severe and frequent wildfires, more severe storms and extreme weather events, shrinking snowpack and less overall precipitation, ocean acidification, hypoxia,[2] and warming. To address local and regional governments' need for information to support action in their communities, the Fourth Assessment (CNRA 2018) includes reports for nine regions of the state, including the Los Angeles Region, which includes Orange County where the Project is located. Key projected climate changes for the Los Angeles Region include the following (CNRA 2018):

- Continued future warming over the Los Angeles Region. Across the region, average maximum temperatures are projected to increase around 4°F to 5°F by the mid-century, and 5°F to 8°F by the late century.
- Extreme temperatures are also expected to increase. The hottest day of the year may be up to 10°F warmer for many locations across the Los Angeles Region by the late century under certain model scenarios. The number of extremely hot days is also expected to increase across the region.
- Despite small changes in average precipitation, dry and wet extremes are both expected to increase. By the late twenty-first century, the wettest day of the year is expected to increase across most of the Los Angeles Region, with some locations experiencing 25% to 30% increases under certain model scenarios. Increased frequency and severity of atmospheric river events are also projected to occur for this region.
- Sea levels are projected to continue to rise in the future, but there is a large range based on emissions scenario and uncertainty in feedbacks in the climate system. Roughly 1 foot to 2 feet of sea level rise is projected by the mid-century, and the most extreme projections lead to 8 feet to 10 feet of sea level rise by the end of the century.
- Projections indicate that the number of wildfires may increase over southern California, but there remains uncertainty in quantifying future changes of burned area over the Los Angeles region.

[2] Hypoxia is the state in which oxygen is not available in sufficient amounts at the tissue level to maintain adequate homeostasis.

4.1.2 Regulatory Setting

Federal

Recent Federal Actions

President Trump's recent executive orders aimed at rolling back federal regulations related to climate change, vehicle fuel standards, and renewable energy do not impact California's current modeling encompassed in the California Emissions Estimator Model (CalEEMod). CalEEMod's mobile source emissions are based on California's EMFAC model, which was approved by the United States Environmental Protection Agency (EPA) in November 2022. The EMFAC model incorporates California-specific regulations such as Advanced Clean Cars and Advanced Clean Trucks. The state's robust climate policies, including its cap-and-trade program and current vehicle emissions standards, remain in effect and continue to guide local environmental assessments and modeling efforts. It should be noted that the federal actions are the subject of ongoing litigation and the final effect on regulations are still to be determined. Consequently, it would be speculative to assume how, if at all, the recent federal actions would alter the methodologies or outcomes of impact analyses contained herein. The changes to federal regulations and federal actions are provided for disclosure purposes only.

Massachusetts v. U.S. Environmental Protection Agency

In Massachusetts v. EPA (2007), the U.S. Supreme Court ruled that GHGs like CO_2 are pollutants under the Clean Air Act and directed the EPA to determine whether emissions from new motor vehicles endanger public health or welfare. This led to the 2009 Endangerment Finding, where the EPA concluded that elevated levels of six GHGs threaten public health and that emissions from vehicles contribute to this pollution. These findings enabled the EPA to regulate GHG emissions from vehicles. However, in 2025, under Executive Order 14154, the EPA proposed to rescind the Endangerment Finding, arguing that the Clean Air Act does not authorize climate-based regulation, that the original science was flawed, and that such regulations impose excessive costs

Federal Vehicle Standards

Following the 2007 Massachusetts v. EPA decision, the Bush and Obama administrations initiated a series of regulatory actions to reduce greenhouse gas (GHG) emissions from vehicles. These included fuel economy and emissions standards for light-, medium-, and heavy-duty vehicles, with increasingly stringent targets through model year 2025. The Obama-era rules projected significant reductions in CO_2 emissions and fuel consumption and included California's authority to set stricter standards under Clean Air Act waivers.

However, beginning in 2018 and continuing under the Trump administration, many of these regulations were reconsidered or rolled back. This included efforts to weaken fuel economy standards, revoke California's waiver authority, and freeze funding for electric vehicle infrastructure. In 2025, further actions were taken to rescind emissions rules and challenge California's programs through Congressional Review Act resolutions, sparking ongoing litigation. These shifts reflect a broader debate over the scope of federal authority to regulate climate-related emissions under the Clean Air Act.

The Inflation Reduction Act of 2022

The Inflation Reduction Act (IRA), signed into law in August 2022, is a major federal investment in energy and climate reform, aiming to reduce U.S. greenhouse gas emissions by 40% below 2005 levels by 2030. It supports

renewable energy infrastructure, offers tax credits for electric vehicle purchases, and promotes energy-efficient homes. The IRA also established the $27 billion Greenhouse Gas Reduction Fund to mobilize public and private financing for climate solutions.

Additionally, the IRA reinforces federal and state authority to regulate GHG emissions in three key areas: California's vehicle emissions standards, EPA's regulation of methane from oil and gas facilities, and EPA's oversight of power plant emissions. However, recent executive actions and legislation under President Trump have paused some IRA funding and challenged its provisions, with the full impact pending court decisions and further administrative review.

One Big Beautiful Bill Act (OBBBA)

The One Big Beautiful Bill Act (OBBBA), signed into law on July 4, 2025, represents a significant change to U.S. climate and clean energy policy. Key revisions include:

- Phase-Out of Clean Energy Tax Credits: The bill eliminates the clean electricity production (45Y) and investment (48E) tax credits for solar and wind by 2027. After that, only hydropower, geothermal, and nuclear projects remain eligible, with credits gradually reduced to zero by 2036.
- Regulatory Rollbacks: It introduces expedited environmental reviews under NEPA through a new opt-in fee system.
- Rescission of IRA Climate Funds: The bill rescinds billions in unspent Inflation Reduction Act funds, including those earmarked for coastal resilience, marine sanctuaries, and climate research.
- Executive Order Enforcement: A follow-up executive order directs the Treasury to tighten eligibility rules for remaining clean energy credits and restrict the use of safe harbor provisions.

Overall, the OBBBA significantly curtails federal support for renewable energy and climate resilience.

State

State Regulations

The statewide GHG emissions regulatory framework is summarized in this subsection by category: state climate change targets, building energy, renewable energy and energy procurement, mobile sources, water, solid waste, and other state actions. The following text describes Executive Orders (EOs), Assembly Bills (ABs), Senate Bills (SBs), and other plans and policies that would directly or indirectly reduce GHG emissions and/or address climate change issues.

State Climate Change Targets

The state has taken several actions to address climate change. These actions are summarized below, and include EOs, legislation, and CARB plans and requirements.

Executive Order S-3-05

Executive Order S-3-05 (June 2005) established the following statewide goals: GHG emissions should be reduced to 2000 levels by 2010, to 1990 levels by 2020, and to 80% below 1990 levels by 2050.

Assembly Bill 32

In furtherance of the goals established in EO S-3-05, the legislature enacted AB 32 (Núñez and Pavley). AB 32 provided initial direction on creating a comprehensive multiyear program to limit California's GHG emissions to 1990 levels by 2020 and initiate the transformations required to achieve the state's long-range climate objectives.

Executive Order B-30-15

EO B-30-15 (April 2015) identified an interim GHG-reduction target in support of targets previously identified under S-3-05 and AB 32. EO B-30-15 set an interim target goal of reducing GHG emissions to 40% below 1990 levels by 2030 to keep California on its trajectory toward meeting or exceeding the long-term goal of reducing GHG emissions to 80% below 1990 levels by 2050, as set forth in S-3-05. To facilitate achieving this goal, EO B-30-15 called for CARB to update the Climate Change Scoping Plan (Scoping Plan) to express the 2030 target in terms of millions of metric tons (MMT) CO_2e. The EO also called for state agencies to continue to develop and implement GHG emission-reduction programs in support of the reduction targets.

Senate Bill 32 and Assembly Bill 197

SB 32 and AB 197 (enacted in 2016) are companion bills. SB 32 codified the 2030 emissions-reduction goal of EO B-30-15 by requiring CARB to ensure that statewide GHG emissions are reduced to 40% below 1990 levels by 2030. AB 197 established the Joint Legislative Committee on Climate Change Policies, consisting of at least three members of the Senate and three members of the Assembly, to provide ongoing oversight over implementation of the state's climate policies. AB 197 also added two members of the Legislature to the Board as nonvoting members; requires CARB to make available and update (at least annually via its website) emissions data for GHGs, criteria air pollutants, and TACs from reporting facilities; and requires CARB to identify specific information for GHG emissions-reduction measures when updating the Scoping Plan.

Executive Order B-55-18

EO B-55-18 (September 2018) identified a policy for the state to achieve carbon neutrality as soon as possible (no later than 2045) and achieve and maintain net negative emissions thereafter. The goal is in addition to the existing statewide targets of reducing the state's GHG emissions. CARB will work with relevant state agencies to ensure that future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal.

Assembly Bill 1279

The Legislature enacted AB 1279, the California Climate Crisis Act, in September 2022. The bill declares the policy of the state to achieve net zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net negative GHG emissions thereafter. Additionally, the bill requires that by 2045, statewide anthropogenic GHG emissions be reduced to at least 85% below 1990 levels.

California Air Resources Board's Climate Change Scoping Plan

One specific requirement of AB 32 was for CARB to prepare a scoping plan for achieving the maximum technologically feasible and cost-effective GHG emission reductions by 2020 (Health and Safety Code Section 38561[a]), and to update the plan at least once every 5 years. In 2008, CARB approved the first scoping plan. Since 2008, the Scoping Plan has been updated, identifying new, technologically feasible and cost-effective strategies

that will serve as the framework to achieve the 2030 GHG target as established by SB 32 and define the state's climate change priorities to 2030 and beyond.

The 2022 Scoping Plan outlines the state's plan to reach carbon neutrality by 2045 or earlier, while also assessing the progress the state is making toward reducing GHG emissions by at least 40% below 1990 levels by 2030, as is required by SB 32. The carbon neutrality goal requires CARB to expand proposed actions from only the reduction of anthropogenic sources of GHG emissions to also include those that capture and store carbon (e.g., through natural and working lands, or mechanical technologies). The carbon reduction programs build on and accelerate those currently in place, including moving to zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high GWP; providing communities with sustainable options for walking, biking, and public transit; displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines); and scaling up new options such as green hydrogen. The 2022 Scoping Plan also emphasizes that there is no realistic path to carbon neutrality without carbon removal and sequestration, and to achieve the state's carbon neutrality goal, carbon reduction programs must be supplemented by strategies to remove and sequester carbon (CARB 2022).

Building Energy

California Code of Regulations, Title 24, Part 6

Title 24 of the CCR was established in 1978 and serves to enhance and regulate California's building standards. Although not initially promulgated to reduce GHG emissions, Part 6 of Title 24 specifically established building energy efficiency standards that are designed to ensure new and existing buildings in California achieve energy efficiency and preserve outdoor and indoor environmental quality. The Building Standards Commission and California Energy Commission (CEC) review these energy efficiency standards every few years and revise them if necessary (California Public Resources Code [PRC] Section 25402[b][1]). The regulations receive input from members of industry and the public, with the goal of "reducing of wasteful, uneconomic, inefficient, or unnecessary consumption of energy" (California PRC Section 25402). These regulations are carefully scrutinized and analyzed for technological and economic feasibility (California PRC Section 25402[d]) and cost effectiveness (California PRC Sections 25402[b][2] and [b][3]). As a result, these standards save energy, increase electricity supply reliability, increase indoor comfort, avoid the need to construct new power plants, and help preserve the environment.

The 2025 Title 24 building energy efficiency standards were adopted in September 2024 and will become effective January 1, 2026. The 2025 building energy code focuses on key areas:

- Encouraging inherently efficient electric heat pump technology for space and water heating in newly constructed single-family, multifamily, and select nonresidential building types.
- Replacing end-of-life rooftop heating, ventilation, and air-conditioning (HVAC) units of a certain size with high efficiency systems including heat pumps, for existing retail, existing schools, and existing offices and libraries.
- Establishing electric-ready requirements for commercial kitchens and some multifamily buildings, so owners can more easily switch to cleaner electric cooking and water heating, when ready.
- Updating solar and storage standards for assembly buildings, including religious worship, sport, and recreation buildings to make clean energy available for onsite use while minimizing exports to the electrical grid.
- Strengthening ventilation standards to improve indoor air quality in multifamily buildings.

California Code of Regulations, Title 24, Part 11

In addition to the CEC's efforts, in 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11 of Title 24) is commonly referred to as CALGreen and establishes minimum mandatory standards and voluntary standards pertaining to the planning and design of sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and interior air quality. The CALGreen 2022 standards, which are the current standards, became effective January 1, 2023.

The CEC formally adopted the 2025 Title 24 Energy Code on September 11, 2024, which was then approved by the California Building Standards Commission (CBSC) on December 17, 2024, making its effective date January 1, 2026. Buildings whose permit applications are applied for on or after January 1, 2026, must comply with the 2025 Energy Code. The 2025 Energy Code updates for nonresidential buildings introduces several key changes aimed at improving energy efficiency and supporting the state's climate goals. These include enhanced mechanical system standards, such as updated requirements for HVAC and heat pump water heaters, and stronger building envelope performance to reduce energy loss. Electrical systems now require more advanced lighting controls and expanded testing protocols. The code also adds readiness provisions for solar and battery storage installations and includes laboratories under its scope for energy-intensive processes. Compliance tools and manuals have been revised to reflect new modeling rules, and the updates continue to align with CALGreen standards for sustainability, including water efficiency and indoor air quality.

California Code of Regulations, Title 20

Title 20 of the CCR requires manufacturers of appliances to meet state and federal standards for energy and water efficiency. Performance of appliances must be certified through the CEC to demonstrate compliance with standards.

Senate Bill 1

SB 1 (2006) established a $3 billion rebate program to support the goal of the state to install rooftop solar energy systems with a generation capacity of 3,000 megawatts through 2016. SB 1 added sections to the California Public Resources Code, including Chapter 8.8 (California Solar Initiative), that require building projects applying for ratepayer-funded incentives for PV systems to meet minimum energy-efficiency levels and performance requirements (California Public Resources Code Sections 25780–25784). Section 25780 established that it is a goal of the state to establish a self-sufficient solar industry. The goals included establishing solar energy systems as a viable mainstream option for both homes and businesses within 10 years of adoption and placing solar energy systems on 50% of new homes within 13 years of adoption. SB 1, also termed "Go Solar California," was previously titled "Million Solar Roofs."

Assembly Bill 1470

This bill established the Solar Water Heating and Efficiency Act of 2007 (California Public Utilities Code Sections 2851–2869). The bill makes findings and declarations of the Legislature relating to the promotion of solar water heating systems and other technologies that reduce natural gas demand.

Assembly Bill 1109

Enacted in 2007, AB 1109 required CEC to adopt minimum energy efficiency standards for general-purpose lighting to reduce electricity consumption by 50% for indoor residential lighting and by 25% for indoor commercial lighting (California Public Resources Code Section 25402.5.4).

Renewable Energy and Energy Procurement

Senate Bill 1078, Senate Bill 1368, Executive Order S-14-08, Executive Order S-21-09 and Senate Bill X1-2, and Senate Bill 1020

California's Renewables Portfolio Standard (RPS) program was established in 2002 through SB 1078, initially requiring utilities to source 20% of their electricity from renewable resources by 2017. This goal was later accelerated to 20% by 2010 through subsequent legislation and executive orders. Over time, the RPS program expanded significantly: SB X1-2 (2011) set targets of 33% by 2020, SB 350 (2015) raised the goal to 50% by 2030, and SB 100 (2018) increased it further to 60% by 2030, with a long-term goal of 100% zero-carbon electricity by 2045. SB 1020 (2022) reinforced this trajectory by setting interim benchmarks of 90% by 2035 and 95% by 2040.

Complementary legislation such as SB 1368 (2006) established greenhouse gas emission performance standards for electricity procurement, while executive orders S-14-08 and S-21-09 directed state agencies to prioritize renewable energy development. These efforts collectively aim to reduce greenhouse gas emissions, promote clean energy technologies, and ensure reliable, cost-effective electricity for California's residents. The California Public Utilities Commission (CPUC) and California Energy Commission (CEC) oversee implementation and compliance across various electricity providers.

Mobile Sources

State Vehicle Standards (Assembly Bill 1493 and Executive Order B-16-12)

AB 1493, enacted in 2002, required the California Air Resources Board (CARB) to set GHG emission standards for passenger vehicles and light-duty trucks starting with model year 2009, in response to the transportation sector being the largest source of CO_2 emissions in the state. CARB adopted these standards in 2004. Later, Executive Order B-16-12 (2012) directed state agencies to accelerate the commercialization of zero-emission vehicles and set long-term goals to reduce transportation-related GHG emissions by 80% below 1990 levels by 2050, while exempting vehicles needed for public safety.

California's ability to establish its own vehicle standards has recently been called into question, as explained in Section 2.2.2. However, CalEEMod is based on CARB's EMFAC2021 approved by EPA in November 2022 and does not incorporate emission factors for vehicle standards that were affected by recent federal actions, particularly as the analysis uses a 2028 operational date.

Executive Order S-1-07

EO S-1-07 (January 2007, implementing regulation adopted in April 2009) sets a declining Low Carbon Fuel Standard for GHG emissions measured in CO_2e grams per unit of fuel energy sold in California. The target of the Low Carbon Fuel Standard is to reduce the carbon intensity of California passenger vehicle fuels by at least 10% by 2020 (17 CCR 95480 et seq.). The carbon intensity measures the amount of GHG emissions in the lifecycle of a fuel—including extraction/feedstock production, processing, transportation, and final consumption—per unit of

energy delivered. CARB approved amendments to the LCFS in December 2011, implemented on January 1, 2013. In September 2015, the Board re-adopted the LCFS, effective January 1, 2016, to address procedural issues. In 2018, further amendments were made to strengthen carbon intensity benchmarks through 2030, align with SB 32's GHG reduction targets, and add new crediting opportunities for zero-emission vehicles, alternative jet fuel, carbon capture and sequestration, and advanced decarbonization technologies. As of 2022, GHG emissions were cut by 20% since 2000 – with the biggest drop coming from transportation (CARB 2025d).

Senate Bill 375

SB 375 (2008) addresses GHG emissions associated with the transportation sector through regional transportation and sustainability plans. SB 375 required CARB to adopt regional GHG reduction targets for the automobile and light-truck sector for 2020 and 2035. Regional metropolitan planning organizations were then responsible for preparing a sustainable communities strategy (SCS) within their regional transportation plan (RTP). The goal of the SCS is to establish a forecasted development pattern for the region that, after considering transportation measures and policies, would achieve, if feasible, the GHG reduction targets.

Advanced Clean Cars Program and Zero-Emissions Vehicle Program

The Advanced Clean Cars (ACC) I program, launched in 2012, set emissions standards for model years 2015–2025 by integrating regulations for smog-forming pollutants, GHGs, and zero-emission vehicles (ZEVs). It aimed to reduce vehicle emissions significantly, with 2025 cars expected to emit 75% less smog-forming pollution than those sold in 2015. The program also required automakers to increase production of ZEVs and plug-in hybrids.

Building on this, the ACC II program was adopted in 2022 to extend and strengthen emissions and ZEV requirements beyond 2025. Its goals include maximizing real-world reductions in criteria pollutants and GHGs, accelerating ZEV adoption, and ensuring the program is technologically feasible, environmentally sound, equitable, and economically practical.

As described in Section 2.2.2 Federal Regulations, President Trump's Executive Orders and congressional actions could impact California's ability to implement the ACC II. For purposes of the analysis of the Project, given the various legal challenges that exist, it would be speculative to assume a regulatory scheme different from what is utilized by CalEEMod as of the date of the Notice of Preparation.

Executive Order N-79-20

EO N-79-20 (September 2020) requires CARB to develop regulations as follows: (1) Passenger vehicle and truck regulations requiring increasing volumes of new ZEVs sold in the state towards the target of 100% of in-state sales by 2035; (2) medium- and heavy-duty vehicle regulations requiring increasing volumes of new zero-emission trucks and buses sold and operated in the state towards the target of 100% of the fleet transitioning to ZEVs by 2045 everywhere feasible and for all drayage trucks to be zero emission by 2035; and (3) strategies, in coordination with other state agencies, the EPA, and local air districts, to achieve 100% zero emissions from off-road vehicles and equipment operations in the state by 2035. EO N-79-20 called for the development of a ZEV Market Development Strategy, which was released February 2021, to be updated every 3 years, that ensures coordination and implementation of the EO and outlines actions to support new and used ZEV markets. In addition, the EO specifies identification of near-term actions, and investment strategies, to improve clean transportation, sustainable freight, and transit options; and calls for development of strategies, recommendations, and actions by July 15, 2021, to

manage and expedite the responsible closure and remediation of former oil extraction sites as the state transitions to a carbon-neutral economy.

Advanced Clean Trucks Regulation

The Advanced Clean Trucks Regulation, approved by CARB in 2020, aims to accelerate the adoption of zero-emission vehicles (ZEVs) in the medium- and heavy-duty truck sector and reduce emissions from on-road sources. It includes a manufacturer sales requirement mandating increasing percentages of ZEV sales from 2024 to 2035, reaching up to 75% for certain truck classes. It also requires large companies and fleet operators to report vehicle usage data to support future strategies for deploying ZEVs where they are most effective.

As described in Section 2.2.2 Federal Regulations, President Trump's Executive Orders and congressional actions have impacted California's ability to implement the Advanced Clean Truck measures to require increased zero-emission truck vehicle percentages and lower NO_x emissions. For purposes of the analysis of the Project, given the various legal challenges that exist, it would be speculative to assume a regulatory scheme different from what is utilized by CalEEMod as of the date of the Notice of Preparation. The current CalEEMod includes updated methodologies and emissions factors that account for current state-level regulations and fleet turnover trends. While federal actions may affect long-term projections, near-term assumptions are still grounded in California's regulatory environment.

Water

Senate Bill X7-7

SB X7-7, or the Water Conservation Act of 2009, required that all water suppliers increase their water use efficiency with an overall goal of reducing per capita urban water use by 20% by December 31, 2020. Each urban water supplier was required to develop water use targets to meet this goal. This target was largely met, with many suppliers achieving or exceeding their individual goals.

Following 2020, California has continued to build on SB X7-7's foundation. In 2024, the state adopted new regulations under the "Making Conservation a California Way of Life" initiative, which implements AB 1668 and SB 606. These regulations, effective January 1, 2025, establish customized water efficiency standards for each urban retail water supplier based on local conditions. The new framework aims to reduce urban water use by an additional 400,000 acre-feet by 2030, supporting long-term water resilience in the face of climate change

Solid Waste

Assembly Bill 939, Assembly Bill 341, Assembly Bill 1826, and Senate Bill 1383

In 1989, AB 939, known as the Integrated Waste Management Act (California Public Resources Code Section 40000 et seq.), was passed because of the increase in waste stream and the decrease in landfill capacity. The statute established the California Integrated Waste Management Board (replaced in 2010 by the California Department of Resources Recycling and Recovery, or CalRecycle), which oversees a disposal reporting system. AB 939 mandated a reduction of waste being disposed where jurisdictions were required to meet diversion goals of all solid waste through source reduction, recycling, and composting activities of 25% by 1995 and 50% by the year 2000. By the early 2000s, most jurisdictions had achieved the 50% diversion target. The law was later amended to require jurisdictions to maintain the 50% diversion rate annually, not just as a one-time goal. In 2010,

the California Integrated Waste Management Board was replaced by CalRecycle, which continues to oversee compliance and reporting. A review of CalRecycle data for the most recent data available in 2023 for the City shows that the 50% diversion rate equivalent in pounds per person per day has been achieved.

AB 341 (2011) amended the California Integrated Waste Management Act of 1989 to include a provision declaring that it is the policy goal of the state that not less than 75% of solid waste generated be source-reduced, recycled, or composted by the year 2020, and annually thereafter. In addition, AB 341 required CalRecycle to develop strategies to achieve the state's policy goal. CalRecycle has conducted multiple workshops and published documents that identify priority strategies that it believes would assist the state in reaching the 75% goal by 2020. California is currently not meeting the waste reduction target established by AB 341. However, the state remains committed to this goal (CalRecycle 2024). While the 75% target was a statewide goal and not a mandatory diversion rate for each jurisdiction, AB 341 did require certain businesses and multi-family dwellings to implement recycling programs.

AB 1826 (Chapter 727, Statutes of 2014, effective 2016) requires businesses to recycle their organic waste (i.e., food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste) depending on the amount of waste they generate per week. This law also requires local jurisdictions across the state to implement an organic waste recycling program to divert organic waste generated by businesses, including multifamily residential dwellings that consist of five or more units. The minimum threshold of organic waste generation by businesses decreases over time, which means an increasingly greater proportion of the commercial sector will be required to comply.

SB 1383 (2016) requires a 50% reduction in organic waste disposal from 2014 levels by 2020 and a 75% reduction by 2025—essentially requiring the diversion of up to 27 million tons of organic waste—to reduce GHG emissions. SB 1383 also requires that not less than 20% of edible food that is currently disposed be recovered for human consumption by 2025.

California is not currently on track to meet the 75% organic waste diversion target set by SB 1383 for 2025. While the state has made progress in implementing organic waste diversion programs, various reports indicate that the current pace of implementation is not sufficient to reach the ambitious 75% reduction goal by the 2025 deadline.

Other State Actions

Senate Bill 97

SB 97 (2007) directed the Governor's Office of Planning and Research and CNRA to develop guidelines under CEQA for the mitigation of GHG emissions. CNRA adopted the CEQA Guidelines amendments in December 2009, which became effective in March 2010.

Under the amended CEQA Guidelines, a lead agency has the discretion to determine whether to use a quantitative or qualitative analysis or apply performance standards to determine the significance of GHG emissions resulting from a particular project (14 CCR 15064.4[a]). The CEQA Guidelines require a lead agency to consider the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (14 CCR 15064.4[b]). The CEQA Guidelines also allow a lead agency to consider feasible means of mitigating the significant effects of GHG emissions, including reductions in emissions through the implementation of project features or off-site measures (14 CCR 15126.4[c]). The adopted amendments do not establish a GHG emission threshold, instead allowing a lead agency to develop, adopt, and apply its own thresholds of significance or those developed by other agencies or experts. CNRA also acknowledged

that a lead agency could consider compliance with regulations or requirements implementing AB 32 in determining the significance of a project's GHG emissions (CNRA 2009).

With respect to GHG emissions, CEQA Guidelines Section 15064.4(a), as subsequently amended in 2018, states that lead agencies "shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions. The CEQA Guidelines now note that an agency "shall have discretion to determine, in the context of a particular project, whether to: (1) Quantify greenhouse gas emissions resulting from a project; and/or (2) Rely on a qualitative analysis or performance-based standards" (14 CCR 15064.4[a]). Section 15064.4(b) states that the lead agency should consider the following when assessing the significance of impacts from GHG emissions on the environment: (1) the extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting; (2) whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (14 CCR 15064.4[b]).

Executive Order S-13-08

EO S-13-08 (November 2008) is intended to hasten California's response to the impacts of global climate change, particularly sea-level rise. Therefore, the EO directs state agencies to take specified actions to assess and plan for such impacts. The final 2009 California Climate Adaptation Strategy report was issued in December 2009, and an update, Safeguarding California: Reducing Climate Risk, followed in July 2014. To assess the state's vulnerability, the report summarizes key climate change impacts to the state for the following areas: agriculture, biodiversity and habitat, emergency management, energy, forestry, ocean and coastal ecosystems and resources, public health, transportation, and water. Issuance of Safeguarding California: Implementation Action Plans followed in March 2016. In January 2018, CNRA released the Safeguarding California Plan: 2018 Update, which communicates current and needed actions that state government should take to build climate change resiliency.

Local Regulations

South Coast Air Quality Management District

Air districts typically act in an advisory capacity to local governments in establishing the framework for environmental review of air pollution impacts under CEQA. This may include recommendations regarding significance thresholds, analytical tools to estimate emissions and assess impacts, and mitigations for potentially significant impacts. Although air districts will also address some of these issues on a project-specific basis as responsible agencies, they may provide general guidance to local governments on these issues (SCAQMD 2008).

Southern California Association of Governments

California's 18 MPOs have been tasked with creating SCSs in an effort to reduce the region's vehicle miles traveled (VMT) in order to help meet AB 32's GHG targets through integrated transportation, land use, housing, and environmental planning. Pursuant to SB 375, CARB set per-capita GHG emission reduction targets from passenger vehicles for each of the state's 18 MPOs. For SCAG, the state's initial mandated reductions were set at 8% by 2020 and 13% by 2035. In March 2018, CARB updated the SB 375 targets for SCAG to require 8% reduction by 2020 and a 19% reduction by 2035 in per-capita passenger vehicle GHG emissions.

The RTP/SCSs do not require that local general plans, specific plans, or zoning be consistent with it but provide incentives for consistency for governments and developers. Incentives include access to state and federal transportation funds, streamlined environmental review for projects consistent with the RTP/SCS and located in high quality transit areas (HQTA), job centers, and transit priority areas (TPA), and eligibility for SCAG-administered grants such as the Sustainable Communities Program. The RTP/SCS is updated every 4 years. SCAG adopted the 2024–2050 RTP/SCS, also referred to as "Connect SoCal 2024" on April 4, 2024. The Connect SoCal 2024 builds upon prior planning cycles to update the vision of the region's future (SCAG 2024). Connect SoCal 2024 identifies the following strategy areas to support its environmental goals: Sustainable Development, Air Quality, Clean Transportation, Natural and Agricultural Lands Preservation, and Climate Resilience. SCAG's Connect SoCal 2024 RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The Connect SoCal 2024 RTP/SCS is a regional growth management strategy, which targets per capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region pursuant to SB 375. In addition to demonstrating the region's ability to attain the GHG emission reduction targets set forth by CARB, the Connect SoCal 2024 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands (SCAG 2024). Thus, successful implementation of the Connect SoCal 2024 RTP/SCS would result in more complete communities with various transportation and housing choices while reducing automobile use.

Amendment #1, approved on September 5, 2024, updates the original 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) to incorporate time-sensitive project modifications and ensure consistency with the 2025 Federal Transportation Improvement Program (FTIP). This amendment maintains compliance with state and federal planning, air quality, and environmental requirements while allowing critical transportation projects to advance on schedule

City of Garden Grove

City of Garden Grove General Plan

The City of Garden Grove General Plan (City of Garden Grove 2008) does not include specific goals and policies related to greenhouse gas emissions, but its Air Quality Element, Conservation Element, Safety Element, and Circulation Element include goals and policies that would have the co-benefit of reducing GHG emissions.

Air Quality Element

Goal AQ-1. Air quality that meets the standards set by State and Federal governments.

Policy AQ-1.2. Strive to achieve conformance with state-mandated congestion management plans (CMPs), transportation demand management (TDM) plans, or other like State or Federally required pollution reduction plans.

AQ-IMP-1B. Encourage and assist employers in developing and implementing work trip reduction plans, employee ride sharing, modified work schedules, preferential carpool and vanpool parking, or any other trip reduction approach that is consistent with the Air Quality Management Plan for the South Coast Air Basin.

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

Policy AQ-2.2. Promote and encourage ride sharing activities within the community.

Policy AQ-2.3. Continue to improve existing sidewalks, bicycle trails, and parkways, and require sidewalk and bicycle trail improvements and parkways for new development or redevelopment projects.

Policy AQ-2.4. Relive congestion on major arterials and reduce emissions.

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

Goal AQ-3. A diverse and energy efficient transportation system incorporating all feasible modes of transportation for the reduction of pollutants.

Policy AQ-3.1. Cooperate and participate in regional and local efforts to develop an efficient transportation system that reduces vehicle trips and vehicle miles traveled.

Policy AQ-3.2. Cooperate in efforts to expand and promote the use of bus, rail, and other forms of transit within the region in order to further reduce pollutants.

Goal AQ-4. Efficient development that promotes alternative modes of transportation, while ensuring that economic development goals are not sacrificed.

Policy AQ-4.1. Review site developments to ensure pedestrian safety and promote non-automotive users.

AQ-IMP-4C. Require sidewalks through parking lots, bicycle racks near building entrances and other provisions for the safety and convenience of pedestrian and bicycle riders at all commercial, mixed use, and production facilities.

Goal AQ-5. An improved balance of residential, commercial, industrial, recreational, and institutional uses to satisfy the needs of the social and economic segments of the population. Work towards clean air while still permitting reasonable planned growth.

Policy AQ-5.2. Encourage infill development projects within urbanized areas that include jobs centers and transportation nodes.

Policy AQ-5.6. Increase residential and commercial densities around bus and/or rail transit stations, and along major arterial corridors.

AQ-IMP-4C. Require sidewalks through parking lots, bicycle racks near building entrances and other provisions for the safety and convenience of pedestrian and bicycle riders at all commercial, mixed use, and production facilities.

Goal AQ-6. Increased energy efficiency and conservation.

Policy AQ-6.1. Develop incentives and/or regulations regarding energy conservation requirements for private and public developments.

Policy AQ-6.2. Promote energy conservation and disseminate information throughout the community about energy conservation measures.

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

Conservation Element

Goal Con-1. Garden Grove's water resources shall be conserved to ensure equitable amounts of clean water for all users.

Policy CON-1.2. Reduce the waste of potable water through efficient technologies, conservation efforts, and design and management practices, and by better matching the source and quality of water to the user's needs

Policy CON-1.3. Promote water conservation in new development or redevelopment project design, construction, and operations.

Policy CON-1.4. Continue to implement a Water Conservation Program.

CON-IMP-1B. Require on-site infiltration whenever feasible for new development or redevelopment projects.

CON-IMP-1C. Promote site appropriate, low water-use, and drought tolerant native plants city-wide.

CON-IMP-1F. Promote cost-saving conservation measures such as low-flow fixtures, waterless urinals, and other techniques that extend scarce supplies for all homes and businesses.

Goal Con-2. Protect and improve water quality.

Policy CON-2.1. Enhance water infiltration throughout watersheds by decreasing accelerated runoff rates and enhancing groundwater recharge. Whenever possible, maintain or increase a site's pre-development infiltration to reduce downstream erosion and flooding.

Policy CON-2.2. Encourage practices that enable water to percolate into the surrounding soil, instead of letting sediment, metals, pesticides and chemicals runoff directly into the storm drain system, creeks, or regional flood control facilities.

CON-IMP-2D. Minimize impervious services [surfaces] for new development, and incorporate technologies such as pervious paving, landscaped roofs, planter boxes, and rainwater capture and reuse.

Goal Con-3. Reduce Total waste diverted to treatment or disposal at the waste source and through re-use and recycling.

Policy CON-3.1. Update as appropriate and continue to implement the Source Reduction and Recycling Element (SRRE) for the City.

Policy CON-3.4. Encourage the use of materials with minimal impacts to the environment for new development or redevelopment projects in the City.

CON-IMP-3D. Encourage the use of recycled or rapidly renewable materials, and building reuse and renovation over new construction, where feasible.

Goal Con-4. Reduce per-capita non-renewable energy waste and city-wide peak electricity demand through energy efficiency and conservation.

Policy CON-4.1. Integrate energy efficiency and conservation requirements that exceed State standards into the development review and building permit processes.

Policy CON-4.2. Create incentives such as expedited permit processing, technical assistance, and other methods that will encourage energy efficiency technology and practices.

CON-IMP-4A. Adopt Energy Efficiency Standards for new and remodeled buildings that exceed Title 24 building standards.

Goal Con-5. Reduce dependency on non-renewable energy resources through the use of local and imported alternative energy sources.

Policy CON-5.1. Integrate technically and financially feasible renewable energy resources requirements into development and building standards through adopted Renewable Energy Building Standards.

Policy CON-5.2. Promote renewable energy use through regulations, incentives, and available funding opportunities.

Policy CON-5.3. Create opportunities for the purchase and development of local renewable energy resources.

CON-IMP-5G. Encourage renewable technologies through streamlined planning and development rules, codes, and processes.

CON-IMP-5H. Provide incentives such as expedited processing for facilities that use renewable sources for energy production.

Goal Con-6. Green Building programs achieve water and energy efficiency, minimize raw resource consumption, and reduce the amount of waste placed in landfills while improving human health and quality of life in the City.

Policy CON-6.1. The City shall promote improvement in the health and productivity of new buildings, by understanding and training building personnel in new construction practices and the use of alternative or recycled building materials.

Policy CON-6.2. Provide information, marketing, training, and education to the public to support green building activities

Safety Element

Goal SAF-10. A robust, climate-responsive community prepared to anticipate, adapt to, and mitigate impacts stemming from climate change.

Policy SAF-10.6. Encourage development projects to incorporate design features that reduce the impact of extreme heat events

Policy SAF-10.7. Consider the possibility of constrained future water supplies due to long-term climate change impacts on water supplies and require enhanced water conservation for new construction and retrofits.

Policy SAF-10.8. Contribute to and participate in ongoing climate change prevention programs at the regional, State, and Federal levels.

Policy SAF-10.9. Investigate all possible strategies to reduce greenhouse gases from municipal operations, private businesses, and residences.

Policy SAF-10.10. Encourage mixed-use development throughout the City consistent with the goals and policies of the Land Use Element in order to encourage jobs/housing proximity, promote transit-oriented development, and encourage high density development along major corridors, which encourages walking, bicycling and the use of public transit systems.

Policy SAF-10.11. Encourage infill, redevelopment, and higher density development consistent with the goals and policies of the Land Use Element.

SAF-IMP-10F. Design new buildings to use less cooling through passive heat and cooling techniques.

SAF-IMP-10G. Encourage the use of water-porous pavement materials to allow for groundwater recharge and reductions in stormwater runoff and materials that also can reflect solar energy, speed up evaporation, and otherwise stay cooler than traditional pavements.

SAF-IMP-10I. Require the use of sustainable landscaping techniques and water conservation measures in new development beyond the current requirements.

SAF-IMP-10O. Promote limiting idling time for commercial vehicles including delivery and construction vehicles, consistent with South Coast Air Quality Management District idling regulations.

SAF-IMP-10Q. Encourage the use of available energy saving measures that exceed the minimum Title 24 requirements for residential and commercial projects.

SAF-IMP-10AB. Develop a strategy to reduce greenhouse gas emissions citywide consistent with other City policy objectives. Consider developing a climate action plan or other document that defines that strategy. Actions that may be considered as part of the strategy may include:

- On-site renewable energy generation capabilities for larger-scale commercial, industrial, institutional, and multi-family residential developments
- Actions that will move Garden Grove toward zero-net energy over a longer time frame
- Enhanced transit connections to the streetcar station once it is operational
- Outreach to local businesses to identify measures they can pursue to reduce emissions associated with deliveries, production, cooking (for restaurants), and other business practices
- Coordination with local schools to reduce traffic congestion/idling vehicles during pick-up and drop-off times

Circulation Element

Goal CIR-4. A reduction in vehicle miles traveled in order to create a more efficient urban form.

Policy CIR-4.1. Strive to achieve a balance of land uses whereby residential, commercial, and public land uses are proportionally balanced.

Policy CIR-4.2. Strive to reduce the number of miles traveled by residents to their places of employment.

Goal CIR-5. Increased awareness and use of alternate forms of transportation generated in, and traveling through, the City of Garden Grove.

Policy CIR-5.1. Promote the use of public transit.

Policy CIR-5.3. Provide appropriate bicycle access throughout the City of Garden Grove.

Policy CIR-5.4. Provide appropriate pedestrian access throughout the City of Garden Grove.

Policy CIR-5.5. Continue to implement the provisions of the Transportation Demand Ordinance.

CIR-IMP-5A. Promote the use of Transportation Demand Management (TDM) Measures.

CIR-IMP-5B. Encourage the creation of programs such as Transportation Systems Management (TSM), public transit, carpools/ vanpools, ride-match, bicycling, and other alternatives to the energy-inefficient use of vehicles.

Goal CIR-6. A safe, appealing, and comprehensive bicycle network provides additional recreational opportunities for Garden Grove residents and employees.

Policy CIR-6.3. Encourage existing major traffic generators, and new major traffic generators to incorporate facilities, such as bicycle racks and showers, into the development.

CIR-IMP-6H. Encourage the placement of signage that educates and informs automobiles and bicyclists that use the facility.

Goal CIR-10. Participation in regional transportation planning efforts to address interjurisdictional issues, and maintain competitive advantage in capital improvement funding programs, as appropriate.

Policy CIR-10.3. Encourage employers to reduce employee-related travel.

Goal CIR-11. Continued compliance with regional congestion management, transportation demand, traffic improvement, air quality management, and growth management programs.

Policy CIR-11.5. Encourage employers to reduce employee-related travel.

CIR-IMP-11D. Continue to encourage employers to use vans, small buses, and other HOVs to link work places with potential park-and-ride facilities and transit centers.

CIR-IM-11E. Encourage the provision of convenient eating and recreational facilities on-site for businesses employing more than 100 people.

CIR-IM-11F. Encourage businesses to establish incentives and regulations to spread work trips over a longer period to reduce peak period congestion.

4.1.3 Thresholds of Significance

CEQA Guidelines

The significance thresholds used to evaluate the Project's GHG emissions impacts are based on the recommendations provided in Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.). For the purposes of this GHG emissions analysis, the Project would have a significant environmental impact if it would:

1. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment
2. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs

Global climate change is a cumulative impact; a project participates in this potential impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. The Appendix G thresholds for GHGs do not prescribe specific methodologies for performing an assessment, do not establish specific thresholds of significance, and do not mandate specific mitigation measures. Rather, the CEQA Guidelines emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance consistent with the manner in which other impact areas are handled in CEQA.

With respect to GHG emissions, CEQA Guidelines Section 15064.4(a) states that lead agencies "shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions resulting from a project. The CEQA Guidelines note that an agency has the discretion to either quantify a project's GHG emissions and/or rely on a "qualitative analysis or performance-based standards" (14 CCR 15064.4[a]). A lead agency may use a "model or methodology" to estimate GHG emissions and has the discretion to select the model or methodology it considers "most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change" (14 CCR 15064.4[c]). The CEQA Guidelines provide that the lead agency should consider the following when determining the significance of impacts from GHG emissions on the environment (14 CCR 15064.4[b]):

1. The extent a project may increase or reduce GHG emissions as compared to the existing environmental setting.

2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

In addition, the CEQA Guidelines specify that "[w]hen adopting or using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence" (14 CCR 15064.7[c]).

Governor's Office of Planning and Research Guidance

The Governor's Office of Planning and Research technical advisory titled, "CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review," states that "public agencies are encouraged but not required to adopt thresholds of significance for environmental impacts. Even in the absence of clearly defined thresholds for GHG emissions, the law requires that such emissions from CEQA projects must be disclosed and mitigated to the extent feasible whenever the lead agency determines that the project contributes to a significant, cumulative climate change impact" (OPR 2008). Furthermore, the advisory document indicates that "in the absence of regulatory standards for GHG emissions or other scientific data to clearly define what constitutes a 'significant impact,' individual lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice" (OPR 2008).

South Coast Air Quality Management District Guidance

In October 2008, SCAQMD proposed recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts, as presented in its Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold (SCAQMD 2008). This guidance document, which builds on the previous guidance prepared by the California Air Pollution Control Officers Association (CAPCOA), explored various approaches for establishing a significance threshold for GHG emissions. The draft interim CEQA thresholds guidance document was not adopted or approved by the Governing Board. However, in December 2008, SCAQMD adopted an interim 10,000 MT CO_2e per-year screening level threshold for stationary source/industrial projects for which SCAQMD is the lead agency (see SCAQMD Resolution No. 08-35, December 5, 2008).

SCAQMD formed a GHG CEQA Significance Threshold Working Group to develop GHG CEQA significance thresholds until statewide significance thresholds or guidelines are established. From December 2008 to September 2010, SCAQMD hosted working group meetings and revised the draft threshold proposal several times, although it did not officially provide these proposals in a subsequent document. The most recent proposal, issued in September 2010, proposed the following tiered threshold approach to evaluate potential GHG impacts from various uses (SCAQMD 2010):

Tier 1. Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.

Tier 2. Consider whether or not the project is consistent with a locally adopted GHG reduction plan that has gone through public hearing and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.

Tier 3. Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 MT CO_2e per-year threshold for industrial uses would be

recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 MT CO_2e per year), commercial projects (1,400 MT CO_2e per year), and mixed-use projects (3,000 MT CO_2e per year). Under option 2, a single numerical screening threshold of 3,000 MT CO_2e per year would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.

Tier 4. Consider whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of Assembly Bill (AB) 32 to reduce statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 MT CO_2e per-service population for project-level analyses and 6.6 MT CO_2e per-service population for plan-level analyses. The 2035 efficiency targets are 3.0 MT CO_2e per-service population for project-level analyses and 4.1 MT CO_2e per-service population for plan-level analyses If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.

Tier 5. Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project emissions to the target significance threshold.

Notably, the bright-line thresholds were intended to capture 90% of new development. The 2035 SCAQMD-efficiency threshold target date was based on Senate Bill 375 target date for achieving GHG reductions. The SCAQMD-efficiency thresholds specified in Tier 4, therefore, do not consider Senate Bill 32 which has a target date of 2030 or the new carbon neutrality target of 2045. These regulatory measures were adopted after the SCAQMD-efficiency thresholds were developed. As the Tier 4 efficiency thresholds may not be sufficient to achieve the deeper emissions cuts required under SB 32 and the carbon neutrality goals, to be conservative, the Tier 4 efficiency metric is not used here to determine the potential significance of the Project's GHG impacts. The conservative approach utilized to determine the potential significance of GHG impacts is described in the next subsection.

Approach to Determining Significance

The CEQA Guidelines do not prescribe specific methodologies for performing an assessment, do not establish specific thresholds of significance, and do not mandate specific mitigation measures. Rather, the CEQA Guidelines emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance consistent with the manner in which other impact areas are handled in CEQA (CNRA 2009). The 3,000 MT CO_2e per year threshold was recommended by the SCAQMD for all non-industrial projects, however, the City, in exercising its lead agency discretion, has conservatively elected to apply the SCAQMD recommended Tier 3 threshold of 1,400 MT CO_2e per year for commercial projects for this Project with respect to CEQA Guidelines Checklist Question 1 – Whether the Project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. This approach is conservative because the City is applying the lowest numeric threshold recommended by the SCAQMD. That threshold is significantly lower compared to the thresholds for mixed-use (3,000 MT CO_2e per year) and residential (3,500 MT CO_2e per year) development. As described previously, under the tiered approaches recommended by SCAQMD, the City exercised its discretion to not use the Tier 4 efficiency threshold. The Project is not eligible to use Tier 1 or 2 because it is not exempt from CEQA and there is no City adopted GHG reduction plan.

SCAQMD established the various bright line thresholds to facilitate the achievement of statewide and regional goals for GHG emissions. As discussed above, use of 1,400 MT CO_2e per year as a bright-line threshold for the Project is a conservative approach. The SCAQMD thresholds were derived from modeling and analysis that showed GHG

impacts would be less than significant at the identified threshold levels by screening out from further review only the lowest emitting 10% of projects Thus, the City's conservative use of the SCAQMD threshold demonstrates that GHG emissions for the Project would be less than cumulatively considerable if those emissions fall (or are reduced to) below the 1,400 MT CO_2e per year threshold.

Regarding CEQA Guidelines Checklist Question 2 – Whether the Project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, in the absence of a City Climate Action Plan, this analysis evaluates consistency with state and regional GHG reduction plans, as well as consistency with any GHG related goals and policies of the City's General Plan, to assess the impact.

The Scoping Plan (approved by CARB in 2008 and updated in 2014, 2017, and 2022) provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. The Scoping Plan is not directly applicable to specific projects, nor is it intended to be used for project-level evaluations.[3] Under the Scoping Plan, however, there are several state regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage, high-GWP GHGs in consumer products) and changes to the vehicle fleet (i.e., hybrid, electric, and more fuel-efficient vehicles) and associated fuels (e.g., Low Carbon Fuel Standard), among others. At the regional level, the 2024 Connect SoCal serves as the RTP/SCS and has been adopted for the purpose of reducing GHG emissions attributable to passenger vehicles in the Southern California region.

If the Project does not conflict with the regulations and actions outlined in the applicable state plans (i.e., 2022 Scoping Plan), regional plans (i.e., SCAG RTP/SCS) or applicable City General Plan goals and policies, then it would have a less-than-significant impact.

4.1.4 Approach and Methodology

The California Emissions Estimator Model (CalEEMod) 2022 Version 2022.1.1.30 was used to estimate emissions from construction and operation of the Project (CAPCOA 2022). CalEEMod is a computer model developed in cooperation with air districts throughout the state to quantify criteria air pollutant and GHG emissions associated with construction activities and operation of a variety of land use projects. CalEEMod input parameters, including the land use type used to represent the Project and its size, construction schedule, and anticipated use of construction equipment, were based on the experience of GHG experts and information provided by the City, or the applicant, or relevant default model assumptions where Project specifics were unavailable.

CalEEMod Land Use Assumptions

The land use assumptions used to estimate construction and operational emissions in CalEEMod are presented in Table 4.1-2.

[3] The Final Statement of Reasons for the amendments to the State CEQA Guidelines reiterates the statement in the Initial Statement of Reasons that "[t]he Scoping Plan may not be appropriate for use in determining the significance of individual projects because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan" (CNRA 2009).

Table 4.1-2. CalEEMod Land Use Development Summary

CalEEMod Land Use Type	CalEEMod Land Use Subtype	Land Use Amount (Size)	Land Use Size Metric	Building Square Footage	Land Use Acreage
Recreational	Hotel	500	Room	417,233	3.72
Parking	Enclosed Parking with Elevator	528	SP	301,686	0

Notes: CalEEMod = California Emissions Estimator Model; KSF = 1,000 square feet; SP = space. Ancillary uses associated with the hotel such as restaurant, meeting rooms, entertainment spaces and health and fitness are included within the hotel building square footage as those uses will only be available to guests of the hotel. The GHG emissions associated with the swim facilities were also calculated and included in the operational GHG emission estimates.

Construction Emissions

Construction Scenario

Construction of the Project would result in GHG emissions associated with use of off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles. For purposes of estimating Project emissions, the analysis conservatively evaluated project construction as if it would commence in October 2025.[4] The duration of construction activity and associated equipment represent a conservative assumption about the timing for the construction and a reasonable approximation of the expected construction fleet as required per CEQA guidelines. The analysis presented herein is based on the following durations.

- Site Preparation: 8 days (October 1, 2025 – October 28, 2025)
- Site Grading: 1 month (October 29, 2025 – December 2, 2025)
- Building Construction: 25 months (December 3, 2025 – January 11, 2028)
- Paving: 2 months (January 12, 2028 – March 14, 2028)
- Architectural Coating: 3 months (March 15, 2028 – June 27, 2028)

The Project is estimated to require 60,720 cubic yards of soil export. CalEEMod default trip length values were used for the distances for all construction-related trips. Construction worker, vendor, and haul truck trips are based on CalEEMod default assumptions.

The construction equipment mix and vehicle trips used for estimating the Project-generated construction emissions are shown in Table 4.1-3, Construction Scenario Assumptions.

[4] The construction schedule utilized in the analysis represents a "worst-case" analysis scenario since emission factors for construction equipment decrease as the analysis year progresses, due to improvements in technology and more stringent regulatory requirements for emissions from construction equipment. Therefore, construction emissions would likely decrease if the construction schedule moved to a later year.

Table 4.1-3. Construction Scenario

Construction Phase	One-Way Vehicle Trips				Equipment		
	Average Daily Worker Trips	Average Daily Vendor Truck Trips	Total Haul Truck Trips	On-Site Trucks	Equipment Type	Quantity	Usage Hours
Site Preparation	18	6	0	0	Rubber Tired Dozers	2	8
					Tractors/Loaders/Backhoes	3	8
Site Grading	16	6	254	0	Graders	1	8
					Excavators	1	8
					Tractors/Loaders/Backhoes	3	8
					Rubber Tired Dozers	1	8
					Compactor (Other Construction Equipment)	2	3
Building Construction	418	164	0	0	Forklifts	3	8
					Generator Sets	1	8
					Cranes	1	6
					Welders	1	8
					Tractors/Loaders/Backhoes	3	8
Paving	24	4	0	0	Tractors/Loaders/Backhoes	1	8
					Cement and Mortar Mixers	2	6
					Pavers	1	8
					Paving Equipment	2	6
					Rollers	2	6
Architectural Coating	84	4	0	0	Air Compressors	1	6

Notes: No demolition is required for the Project as there are no structures on the Project site.

Amortization of Construction Emissions

GHG emissions from construction activities occur over a relatively short-term period, accordingly, they contribute a relatively small portion of the overall lifetime project GHG emissions. In addition, GHG emission reduction measures for construction equipment are relatively limited. The SCAQMD recommends amortizing the construction GHG emissions over the life of the project so that GHG reduction measures present a more complete assessment of a project's GHG contributions (SCAQMD 2008). The California Association of Environmental Professionals Climate Change Committee also recommends amortizing construction emissions and combining them with operational emissions to make a single significance determination. Amortization of construction GHG emissions is done by adding all the construction GHG emissions for every year of construction and then dividing that number by the operational lifetime (CAEP 2016). The SCAQMD recommends that construction emissions be amortized over a 30-year project lifetime (SCAQMD 2008). This time frame is supported by lifecycle analyses and industry standards, which indicate that significant asset renewal and maintenance activities typically occur around this timeframe (RDH 2015). While the Project could continue to exist for more than 30 years. during and after the 30-year Project life period, the Project would be subject to a range of existing and future regulatory standards and policies applicable to the built environment. California is expected to implement numerous additional policies, regulations and programs to reduce statewide emissions to achieve the GHG reduction goals

of SB 32 and EO S-3-05. Based on SCAQMD guidance, lifecycle analyses, and industry standards, a 30-year project life has been utilized in this analysis.

Land Use Change (Stored Carbon Loss)

Land use development has the potential to result in loss of sequestered carbon that would result from removal of trees or vegetation on site during construction. The Project site is currently graded with no trees or substantial vegetation that would result in meaningful carbon storage. As such, this GHG analysis does not include a calculation of the existing vegetation-related carbon loss.

Operational Emissions

Operational Emission Sources

Project-generated operational GHG emissions were estimated for mobile, area, energy, water and wastewater, solid waste, refrigerants, and stationary sources using CalEEMod and based on Project-specific values and relevant CalEEMod default values for the land use type when Project-specifics were not available. The Project's first full year of operation after construction is estimated to be 2029, however because construction is anticipated to end in April 2028, the year 2028 was conservatively applied as the buildout year. Table 4.1-2 provides a summary of the land use inputs included in the CalEEMod modeling with additional details provided in Appendix C.

Mobile Sources

Mobile sources for the Project would be hotel guests, vendors, and employees traveling to and from the Project site. CalEEMod default emission factors representing the vehicle mix and emissions for 2028 were used for build-out of the Project. As represented in CalEEMod, motor vehicles may be fueled with gasoline, diesel, or alternative fuels, such as electricity. The Project's VMT assessment (Translutions 2025) was used to inform the mobile source emissions estimate.

The effectiveness of fuel economy improvements was evaluated using the CalEEMod emission factors for motor vehicles to the extent it was captured in CalEEMod 2022.1.1.30 which is based on EMFAC2021. As noted previously, this analysis does not speculate on how industry and other governments will respond to recent federal efforts related to fuel economy standards.

Area Sources

CalEEMod was used to estimate operational emissions from area sources, including emissions from landscape maintenance equipment. Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. The emissions associated with landscape maintenance equipment were calculated based on the relevant default values provided in CalEEMod.

Emissions associated with natural gas usage in space heating, water heating, and stoves are calculated in the building energy use module of CalEEMod, as described in the following text.

Energy Source

GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO_2 and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building. GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions. GHG emissions associated with the natural gas and electricity usage associated with the Project were calculated by CalEEMod using default parameters.

The relevant CalEEMod default energy intensity factor (CO_2, CH_4, and N_2O mass emissions per kilowatt-hour) for Southern California Edison (SCE) was applied, which is based on the projected value for SCE's energy mix in 2028 (CAPCOA 2022). As explained in Section 2.2.3.3, Renewable Energy and Energy Procurement, SB 100 and SB 1020 call for further development of renewable energy, with targets of 52% by December 31, 2027; 60% by December 31, 2030; 90% by December 31, 2035; 95% by December 31, 2040; and 100% by December 31, 2045. As such, GHG emissions associated with Project electricity demand would continue to decrease over time. However, conservatively, the Project analysis of GHG emissions related to energy sources is based on the energy mix projected to exist in 2028.

Water and Wastewater

Supply, conveyance, treatment, and distribution of water for the Project require the use of electricity, which would result in associated indirect GHG emissions. Similarly, the conveyance and treatment of the project's wastewater would generate GHG emissions.

Solid Waste

The Project would generate solid waste. A large percentage of this waste will be diverted from landfills by a variety of means, such as by reducing the amount of waste generated, recycling, and/or composting. The remainder of the waste not diverted will be disposed of at a landfill. The City and CALGreen require 65% diversion of waste from construction debris. California has established a target of 75% organic waste diversion target compared to 2014 levels and to recover 20% of edible foods by 2025. GHG emissions from landfills are associated with the anaerobic breakdown of material. GHG emissions based on the disposal of solid waste associated with the Project were calculated by CalEEMod using relevant default parameters. Municipal solid waste associated with the recreational water facilities (Swimming pool), such as empty chemical containers was included in the hotel solid waste estimates.

A review of CalRecycle data shows that hotels and lodging contribute 1.5% to the total commercial waste stream in Garden Grove (CalRecycle 2025). The CalRecycle data also shows that hotels and lodgings in Garden Grove divert approximately 19.8% of their mixed solid waste. The most recent statewide waste characterization study showed that large hotels divert 22.7% of their mixed solid waste (CalRecycle 2006).

Refrigerants

Refrigerants are substances used in the equipment for air conditioning (A/C) and refrigeration. Most of the refrigerants used today are HFCs or blends thereof, which can have high GWP values. All equipment that uses refrigerants has a charge size (i.e. quantity of refrigerant the equipment contains) and an operational refrigerant leak rate, and each refrigerant has a GWP that is specific to that refrigerant. CalEEMod quantifies refrigerant

emissions from leaks during regular operation and routine servicing over the equipment lifetime, and then derives average annual emissions from the lifetime estimates.

Refrigerant emissions are associated with buildings and mobile sources primarily from A/C usage.

Stationary Sources

A stationary source is defined as any building, structure, facility, or installation which emits or may emit any pollutants. A 1,341 horsepower (hp) back-up generator may be required during emergency outages. Emergency backup diesel generators are considered stationary sources and subject to permitting from the SCAQMD. The modeling evaluated the generators based on statewide average emission factors for a 2028 operational year and operation of an average of 40 hours annually, primarily for testing purposes.

Land Use Change (Carbon Sequestration)

The Project will plant trees that will serve to sequester carbon. Planting trees and enhancing landscaping can significantly contribute to carbon sequestration because trees absorb CO_2 during photosynthesis and store it in their biomass (trunks, branches, leaves, and roots). Over time, this process helps reduce the overall concentration of CO_2 in the atmosphere, mitigating the effects of climate change. The Project did not take any reduction in GHG emissions attributable to carbon sequestration benefits from tree planting.

4.1.5 Project Design Features Previously Approved

The following summarizes the previously approved GHG related Project Design Features (PDFs) that are incorporated into the Project. It should be noted that all the following PDFs are qualitative/supporting measures. Therefore, for purposes of quantifying the Project's GHG emissions and the potential significance of impacts, no GHG reductions were taken based on the implementation of these measures.

Construction

PDF-4 Construction equipment should be maintained in proper tune.

Qualitative/supporting – Maintaining heavy-duty off-road construction equipment in proper tune reduces GHG emissions. When engines are well-maintained—through regular servicing, timely replacement of filters, proper lubrication, and calibration—they operate more efficiently, burn fuel more completely, and emit fewer pollutants. There is no way to quantify these reductions in CalEEMod. Potential GHG emissions reductions are not estimated.

PDF-5 All construction vehicles should be prohibited from excessive idling. Excessive idling is defined as 5 minutes or longer.

Qualitative/supporting – Reduction in idling time helps to reduce fuel consumption and thus GHG emissions. There is no way to quantify these reductions in CalEEMod. Potential GHG emissions reductions are not estimated.

PDF-8 For construction activities other than those addressed by MM-GHG-1 and MM-GHG-2, establish an electricity supply to the construction site and use electric powered equipment instead of diesel-powered equipment or generators, where feasible.

Qualitative – Results in a reduction of diesel and gasoline use and thus GHG emissions. Conservatively, given the uncertainty in predicting the amount of reduction and the mix of electric powered equipment and phase of construction, it is too speculative to take GHG emission reductions from this PDF.

PDF-10 Use haul trucks with on-road engines instead of off-road engines for on-site hauling.

Qualitative/supporting – On-road trucks are subject to more stringent emissions regulations such as Environmental Protection Agency (EPA) highway standards and California Air Resources Board (CARB) emission standards compared to off-road equipment. On-road trucks are also typically designed for better fuel economy resulting in fewer GHG emissions. There is no way to quantify these reductions in CalEEMod. Potential GHG emissions reductions are not estimated.

Operations

PDF-11 The Project will comply with the mandatory requirements of the latest California Building Standards Code, Title 24, Part 6 (Energy Code) and Part 11 (California Green Building Standards Code [CALGreen]), including the provisions for bicycle parking, electric vehicle charging stations, energy efficiency, material conservation, and water/waste reduction.

Qualitative/supporting – Complying with Title 24 Building Energy Efficiency Standards reduces GHG emissions by improving energy efficiency in non-residential buildings. Title 24 includes mandatory and voluntary green building measures that promote sustainable construction practices, reduce water usage, and support the integration of renewable energy systems like solar photovoltaics. These standards help decrease reliance on fossil fuels, thereby lowering emissions from power generation and building operations. Project compliance with current standards would generate GHG emission reductions compared to the CalEEMod GHG estimates disclosed in this technical report. CalEEMod provides conservative energy use estimates because its calculations are based on the 2019 consumption estimates from the California Energy Commission's' 2018-2030 Uncalibrated Commercial Sector Forecast and is based on default assumptions for building energy use, occupancy, and equipment efficiency, which does not reflect the most recent Title 24 energy efficiency standards. It would be speculative to estimate potential reductions with future standards in place at the time of building permit issuance for construction, when the current Title 24 standards would apply to building operations. Proof of compliance with Title 24 standards is required prior to issuance of certificate of occupancy. Potential GHG reductions are not estimated.

PDF-12 Install signage at loading docks requiring trucks to limit engine idling times to 5 minutes or less.

Qualitative/supporting – The California Air Resources Board (CARB) has an Airborne Toxic Control Measure (ATCM) to limit diesel-fueled commercial motor vehicle idling, primarily to reduce public exposure to diesel exhaust. This ATCM, outlined in 13 CCR § 2485, restricts idling of diesel-fueled commercial vehicles (greater than 10,000 lbs) to a maximum of five consecutive minutes at any location. Limiting engine idling would reduce fuel combustion and thus reduce GHG emissions.

There is no available method to estimate potential GHG emission reductions in CalEEMod attributable to the limit on idling time. This is a qualitative measure in CalEEMod, thus potential GHG emissions reductions are not estimated.

PDF-21 Engine idling time for all delivery vehicles and trucks must be limited to 5 minutes or less. Signage should be posted in the designated loading areas reflecting the idling restrictions.

Qualitative/supporting – This measure is intended to apply to all delivery vehicles and trucks accessing the site, regardless of potential vehicle weight that would be subject to CARB's ATCM for idling. Limiting engine idling would reduce fuel combustion and thus reduce GHG emissions. There is no available method to estimate potential GHG emission reductions in CalEEMod attributable to the limit on idling time. This is a qualitative measure in CalEEMod, thus potential GHG emissions reductions are not estimated.

4.1.6 New Project Design Features

PDF-27 Sustainable Building Materials. The Project will prioritize low-impact, sustainably sourced, and recyclable materials across construction and interior finishes, including low-VOC paints, Forest Stewardship Council-certified wood, and recycled-content flooring. The Project is also implementing vendor standards that require environmental product declarations and third-party certifications to verify material sustainability .Materials shall be selected not only for their initial environmental footprint but also for durability and long-term performance, reducing the need for frequent replacement and associated waste.

Qualitative/supporting – Sustainable building materials play a crucial role in reducing GHG emissions by addressing both embodied and operational carbon impacts in the construction sector. Embodied carbon refers to emissions from the extraction, manufacturing, and transportation of materials, while operational carbon stems from a building's energy use over time. It is too speculative to claim GHG reductions for sustainable building design measures because actual emissions reductions depend on uncertain factors like material sourcing, construction practices, and long-term building performance. Without verified, project-specific data, such claims lack the certainty needed for credible crediting. Accordingly, this measure is qualitative and potential GHG emissions reductions are not estimated.

4.1.7 Impacts Analysis

GHG-1. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Quantification of GHG Emissions

Construction Emissions

Construction of the Project would result in GHG emissions, which are primarily associated with the use of off-road construction equipment, haul trucks, on-road vendor trucks, and worker vehicles.

CalEEMod was used to calculate the annual GHG emissions based on the construction scenario described in Section 4.1.4. Table 4.1-4 presents the unmitigated construction emissions for the Project in 2025 through 2028. As noted in Section 4.1.5, the Project includes PDFs for construction that would potentially reduce GHG emissions. The Project's PDFs include many of the best management practices for reducing GHG emissions from construction. Specifically, PDF-4, PDF-5, and PDF-10, would encourage more efficient fuel consumption and PDF-8 would establish electricity supply to the Project site for use of electric-powered equipment instead of diesel fueled equipment. Given the nature of those PDFs and to conservatively analyze the GHG emissions, the analysis does not take credit for any reductions in the Project's GHG emissions that may be attributable to those PDFs. The amortized construction emissions are also shown.

Table 4.1-4. Estimated Annual Construction Greenhouse Gas Emissions - Unmitigated

Year	CO_2	CH_4	N_2O	R	CO_2e
	Metric Tons per Year				
2025	397.94	0.02	0.04	0.34	411.57
2026	1,512.89	0.05	0.11	1.65	1,549.05
2027	1,491.17	0.05	0.11	1.48	1,525.84
2028	121.00	0.00	0.01	0.10	122.87
				Total	**3,609.33**
				Amortized 30-Year Construction Emissions	***120.31***

Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; R = refrigerant; CO_2e = carbon dioxide equivalent; <0.01 = reported value less than 0.01. The values shown are the annual emissions reflect CalEEMod "unmitigated" output.
Totals may not sum due to rounding.
See Appendix C for complete results.

As shown in Table 4.1-4, the estimated total unmitigated GHG emissions during construction would be approximately 3,609 MT CO_2e over the construction period. Estimated unmitigated Project-generated construction emissions amortized over 30 years would be approximately 120 MT CO_2e per year.

Operational Emissions

Operation of the Project would generate GHG emissions through vehicle trips by hotel guests, employees, and vendors to and from the Project site; area sources such landscape maintenance equipment operation; energy use (generation of electricity consumed by the Project and natural gas use); solid waste disposal; water supply, treatment, and distribution and wastewater treatment; and refrigerants. CalEEMod was used to calculate the annual GHG emissions based on the operational specifications described in Section 4.1.4.

The estimated unmitigated operational Project-generated GHG emissions are shown in Table 4.1-5. As noted previously, the operational PDFs are qualitative in nature and, to be conservative, the analysis does not include any reductions in the Project's GHG emissions attributable to those PDFs.

Table 4.1-5. Estimated Annual Operational Greenhouse Gas Emissions – 2028 - Unmitigated

Emission Source	CO_2	CH_4	N_2O	R	CO_2e
	Metric Tons per Year				
Mobile	2,614.57	0.14	0.11	3.24	2,655.24
Area	14.58	<0.01	<0.01	NA	14.63
Energy	4,982.24	0.45	0.02	NA	4,999.39
Water	40.13	0.93	0.02	NA	70.19
Waste	37.48	3.75	0.00	NA	131.11
Refrigerant	NA	NA	NA	107.99	107.99
Stationary	25.53	<0.01	<0.01	0.00	25.61
Total	**7,714.52**	**5.27**	**0.16**	**111.23**	**8,004.17**
				Amortized 30-Year Construction Emissions	*120.31*
				Project Operation + Amortized Construction Total	**8,124.48**
				GHG Threshold	**1,400**
				Exceed Threshold?	**Yes**

Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; R= refrigerant; CO_2e = carbon dioxide equivalent; <0.01 = reported value less than 0.01; NA = not applicable.
Columns may not sum due to rounding.
See Appendix C for complete results.

As shown in Table 4.1-5, most GHGs associated with the Project are generated by energy sources and mobile sources such as on-road vehicles. The Project would result in approximately 8,004.17 MT CO_2e per year without amortized construction emissions and 8,124.48 MT CO_2e per year with amortized construction emissions. This amount would exceed the GHG threshold of 1,400 MT CO_2e per year. Therefore, the Project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. This would represent a potentially significant impact without mitigation.

Level of Significance Before Mitigation

The Project would have the **potentially significant impact**.

Mitigation measures are required to minimize construction and operational-related GHG impacts.

GHG-2. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Applicable plans, policies or regulations adopted for the purpose of reducing GHG emissions include Connect SoCal 2024, the 2022 Scoping Plan, and applicable policies from the General Plan. The Project's potential to conflict with those applicable GHG reduction plans, policies or regulations is evaluated below.

Potential to Conflict with SCAG's RTP/SCS (Connect SoCal)

In April 2024, SCAG adopted the 2024–2050 RTP/SCS, also referred to as Connect SoCal 2024 which builds upon the prior RTP/SCS. Connect SoCal 2024 includes regional planning policies in the following categories: Mobility, Communities, Environment, and Economy. The primary objective of the RTP/SCS is to

provide guidance for future regional growth (i.e., the location of new residential and non-residential land uses) and transportation patterns throughout the region, as stipulated under SB 375 to achieve compliance with the State's GHG reduction goals. The Connect SoCal 2024 policies are evaluated in Table 4.1-6 below.

Table 4.1-6. Project Potential to Conflict with Connect SoCal 2024

Policy Number	Policy Description	Potential to Conflict
Mobility		
System Preservation and Resilience		
1	Prioritize repair, maintenance and preservation of the SCAG region's existing transportation assets, following a "Fix-It-First" principle	***Not applicable***. This policy addresses the potential development of new transportation assets and is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. The Project does not propose new transportation assets.
2	Promote transportation investments that advance progress toward the achievement of asset management targets, including the condition of the National Highway System pavement and bridges and transit assets (rolling stock, equipment, facilities and infrastructure)	***Not applicable***. This policy concerns transportation investments and is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. The Project does not propose transportation investments of the type addressed by this policy.
Complete Streets		
3	Pursue the development of Complete Streets that comprise a safe, multimodal network with flexible use of public rights-of-way for people of all ages and abilities using a variety of modes (e.g., people walking, biking, rolling, driving, taking transit)	***Not applicable***. This policy is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. As such they are beyond the control of a single project applicant. Nonetheless, the project would participate in providing a safe multi-modal network through its site plan and implementation of MM-GHG-5 that strives to improve walkability and design of the Project through the provision of pedestrian and bicycle connections.
4	Ensure the implementation of Complete Streets that are sensitive to urban, suburban or rural contexts and improve transportation safety for all, but especially for vulnerable road users (e.g., people, especially older adults and children, walking and biking)	***Not applicable***. This policy is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. Nonetheless, the Project promotes Complete Streets as it would participate in providing a safe multi-modal network through its site plan and implementation of MM-GHG-5 that strives to improve walkability and design of the Project through the provision of pedestrian and bicycle connections.
5	Facilitate the implementation of Complete Streets and curb space management	***Not applicable***. This policy related to Complete Streets and curb management strategies is

Table 4.1-6. Project Potential to Conflict with Connect SoCal 2024

Policy Number	Policy Description	Potential to Conflict
	strategies that accommodate and optimize new technologies, micromobility devices and first/last mile connections to transit and last-mile delivery.	designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders.
6	Support implementation of Complete Streets improvements in Priority Equity Communities, particularly with respect to Transportation Equity Zones, as a way to enhance mobility, safety and access to opportunities.	***Not applicable***. This Complete Streets policy is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. The Project is not located in a Priority Equity Community and does not conflict with this policy.
Transit and Multimodal Integration		
7	Encourage and support the implementation of projects, both physical and digital, that facilitate multimodal connectivity, prioritize transit and shared mobility, and result in improved mobility, accessibility and safety.	***Not applicable***. This policy is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders..
8	Support connections across the public, private and nonprofit sectors to develop transportation projects and programs that result in improved connectivity.	***Not applicable***. This policy is a transportation project measure designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders.
9	Encourage residential and employment development in areas surrounding existing and planned transit/rail stations	***No conflict.*** The Project is located on an infill site and would provide employment opportunities near existing transit consistent with the City's General Plan.
10	Support the implementation of transportation projects in Priority Equity Communities, particularly with respect to Transportation Equity Zones, as a way to enhance mobility, safety and access to opportunities	***Not applicable***. This policy relates to transportation projects and is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. The Project is not a transportation project and it is not located in a Priority Equity Community.
11	Create a resilient transportation system by preparing for emergencies and the impacts of climate change	***Not applicable***. This policy relates to transportation projects and is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders.
Transportation System Management		
12	Pursue efficient use of the transportation system using a set of operational improvement strategies that maintain the performance of the existing transportation system instead of adding roadway capacity, where possible.	***Not applicable***. This transportation system operational improvement policy is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. As such this policy does not apply to a single project applicant like the Project applicant.
13	Prioritize transportation investments that	***Not applicable***. This transportation investment

Table 4.1-6. Project Potential to Conflict with Connect SoCal 2024

Policy Number	Policy Description	Potential to Conflict
	increase travel time reliability, including build-out of the regional express lanes network.	policy is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. The project is in a transit priority area and does not propose the addition of roadway capacity.
Transportation Demand Management		
14	Encourage the development of transportation projects that provide convenient, cost-effective and safe alternatives to single-occupancy vehicle travel (e.g., trips made by foot, on bikes, via transit, etc.)	***Not applicable***. This policy regarding the development of transportation projects is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. Nonetheless, the Project is in a transit priority area and would not build new transportation projects but would encourage alternatives to single-occupancy vehicle trips through transportation mitigation measures to encourage employee commute trip reductions such as MM-TRA-1 and MM-TRA 2 and guest vehicle trip reductions through MM-GHG-5.
15	Encourage jurisdictions and TDM practitioners to develop and expand local plans and policies to promote alternatives to single occupancy vehicle travel for residents, workers and visitors	***Not applicable.*** This measure addresses local Transportation Demand Management (TDM) plans and policies and is intended for jurisdictions and TDM practitioners and not individual projects. Nonetheless, the Project would implement TDM measures through MM-TRA-1 and MM-TRA-2. In addition, the Project would implement MM-GHG-5 that seeks to reduce vehicle trips from guests visiting the site.
16	Encourage municipalities to update existing (legacy) TDM ordinances by incorporating new travel modes and new technology and by incorporating employment and residential sites of certain populations—for example, employers who have less than 250 employees (below the 250 or more employees threshold identified in AQMD's Rule 2202)	***Not applicable.*** This measure encourages updates to local TDM plans and policies my municipalities and not individual projects. Nonetheless, the Project includes TDM measures such as MM-TRA-1 that implements a commute trip reduction program and MM-TRA-2 that provides bicycle parking facilities for employees. In addition, the Project would implement MM-GHG-5 that seeks to reduce vehicle trips from guests visiting the site.
17	Support the implementation of technology designed to provide equal access to mobility, employment, economic opportunity, education, health and other quality-of-life opportunities for all residents within the SCAG region.	***Not applicable***. This technology-related policy that emphasizes equal access and is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. The policy is not applicable to an individual General Plan consistent development located in a

Table 4.1-6. Project Potential to Conflict with Connect SoCal 2024

Policy Number	Policy Description	Potential to Conflict
		transit priority area like the Project.
18	Advocate for data sharing between the public and private sectors to effectively evaluate the services' benefits and impacts on communities while protecting data security and privacy	***Not applicable.*** This data sharing policy is intended to be carried out by public agencies, such as SCAG, County Transportation Commissions, or local governments and is not applicable to a single-project applicant. This policy is more aspirational rather than an enforceable standard or requirement for individual projects.
19	Advocate for technology that is adaptive and responsive to ensure it remains up to date and meets the evolving needs of users and stakeholders	***Not applicable.*** This policy is intended to be carried out by public agencies, such as SCAG, County Transportation Commissions, or local governments and is not applicable to a single-project applicant. This policy is more aspirational rather than an enforceable standard or requirement for individual projects.
20	Promote technology that has the capacity to facilitate economic growth, improve workforce development opportunities, and enhance safety and security	***Not applicable.*** This policy is intended to be carried out by public agencies, such as SCAG, County Transportation Commissions, or local governments and is not applicable to a single-project applicant.
21	Proactively monitor and plan for the development, deployment and commercialization of new technology as it relates to integration with transportation infrastructure	***Not applicable.*** This policy is intended to be carried out by public agencies, such as SCAG, County Transportation Commissions, or local governments and is not applicable to a single-project applicant. This policy is more aspirational rather than an enforceable standard or requirement for individual projects.
Safety		
22	Eliminate transportation-related fatalities and serious injuries (especially those involving vulnerable road users, such as people, especially older adults and children, walking and biking) on the regional multimodal transportation system	***Not applicable.*** This policy addresses the regional multimodal transportation systems and is intended to be carried out by public agencies, such as SCAG, County Transportation Commissions, or local governments and is not applicable to a single-project applicant. This policy is more aspirational rather than an enforceable standard or requirement for individual projects. Nonetheless, the Project would support this policy through implementation of MM-GHG-5 that strives to improve walkability and design of the Project through the provision of pedestrian and bicycle connections within the Project site and to adjacent off-site facilities.
23	Integrate the assessment of equity into the regional transportation safety and security planning process, focusing on the analysis and	***Not applicable***. This policy is designed to address the regional transportation safety and security planning process and be implemented at a

Table 4.1-6. Project Potential to Conflict with Connect SoCal 2024

Policy Number	Policy Description	Potential to Conflict
	mitigation of disproportionate impacts on disadvantaged communities	regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. The Project does not propose any improvements that would trigger the regional transportation safety and security planning process and does not conflict with this policy.
24	Support innovative approaches for addressing transit safety and security issues so that impacts to transit employees and the public are minimized and those experiencing issues (e.g., unhoused persons) are supported.	***Not applicable***. This policy relates to safe and secure use of the transit system and is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. The Project does not conflict with this policy.
25	Support the use of transportation safety and system security data in investment decision-making, including consideration of new highway and transit/rail investments that would address safety and security needs	***Not applicable***. This policy relates to investments in a safe and secure transit system and is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. The Project does not conflict with this policy.
Funding		
26	Promote stability and sustainability for core state and federal transportation funding sources.	***Not applicable***. This policy concerns state and federal transportation funding and is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. This policy is more aspirational rather than an enforceable standard or requirement for individual projects.
27	Establish a user fee–based system that better reflects the true cost of transportation, provides firewall protection for new and existing transportation funds, and represents equitable distribution of costs and benefits.	***Not applicable***. This policy addresses user fees for the transportation system and is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. The Project does not conflict with this policy.
28	Pursue funding tools that promote access to opportunity and support economic development through innovative mobility programs	***Not applicable***. This policy relates to funding mobility programs and is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. The Project does not conflict with this policy.
29	Promote national and state programs that include return-to-source guarantees while maintaining the flexibility to reward regions that continue to commit substantial local resources	***Not applicable***. This policy concerns state and federal transportation funding programs and is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. This policy is more aspirational rather than an enforceable standard or requirement for individual projects.

Table 4.1-6. Project Potential to Conflict with Connect SoCal 2024

Policy Number	Policy Description	Potential to Conflict
30	Leverage locally available funding with innovative financing tools to attract private capital and accelerate project delivery.	***Not applicable***. This policy is transportation funding focused and is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. The Project does not conflict with this policy.
31	Promote local funding strategies that maximize the value of public assets while improving mobility, sustainability and resilience	***Not applicable***. This policy is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. This policy is more aspirational rather than an enforceable standard or requirement for individual projects.
Priority Development Areas		
32	Promote the growth of origins and destinations, with a focus on future housing and population growth, in areas with existing and planned urban infrastructure that includes transit and utilities.	***No conflict.*** The Project is located on an infill site that is zoned for commercial use. The Project would provide employment opportunities along a major transportation corridor near existing transit.
33	Promote the growth of origins and destinations, in areas with a proclivity toward multimodal options like transit and active transportation, to reduce single occupant vehicle (SOV) dependency and vehicle miles traveled.	***No conflict with mitigation.*** The Project is in a transit priority area which supports this policy. However, without TDMs to encourage multi-modal travel options the Project would potentially conflict with this policy. The Project includes MM-TRA-1 and MM-TRA-2, which would help to reduce employee commute trips. With the implementation of these measures, the Project would not conflict with this policy.
34	Seek to realize scale economies or a critical mass of jobs and destinations in areas across the region that can support non-SOV options and shorter trip distances, combined trips and reduced vehicle miles traveled.	***No conflict with mitigation***. The Project is a general plan consistent development located in a transit priority area that is convenient to other visitor serving uses. Without TDM measures to encourage non-SOV vehicle trips and reduced VMT, the Project would potentially conflict with the policy. The Project includes MM-TRA-1 and MM-TRA-2 that serves to reduce employee commute trips and MM-GHG-5 that serves to reduce guest vehicle trips through the promotion of transit and alternative transportation. With the implementation of these measures, the Project would not conflict with this policy.
Housing the Region		
35	Encourage housing development in areas with access to important resources and amenities (economic, educational, health, social and	***Not applicable***. This policy is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions,

Table 4.1-6. Project Potential to Conflict with Connect SoCal 2024

Policy Number	Policy Description	Potential to Conflict
	similar) to further fair housing access and equity across the region	agencies, and stakeholders. Notably, the Project is located on an infill site that is General Plan designated for visitor serving uses of the kind proposed by the Project. The City's General Plan designates other areas within the City to satisfy local and regional housing needs.
36	Encourage housing development in transit-supportive and walkable areas to create more interconnected and resilient communities	***Not applicable***. This policy is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. As such they are beyond the control of a single project applicant. The Project would offer employment opportunities near a major transportation corridor near existing transit consistent with the General Plan. The City's General Plan designates other areas within the City to satisfy local and regional housing needs.
37	Support local, regional, state and federal efforts to produce and preserve affordable housing while meeting additional housing needs across the region	***Not applicable***. This policy is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. The Project is located on an infill site that is General Plan designated for the visitor serving uses contemplated by the Project. The City's General Plan designates other areas within the City to satisfy local and regional housing needs.
38	Prioritize communities that are vulnerable to displacement pressures by supporting community stabilization and increasing access to housing that meets the needs of the region.	***Not applicable***. This policy is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. The Project does not require the displacement of existing housing, and the Project site is General Plan designated for the visitor serving uses contemplated by the Project. The City's General Plan designates other areas within the City to satisfy local and regional housing needs.
39	Promote innovative strategies and partnerships to increase homeownership opportunities across the region with an emphasis on communities that have been historically impacted by redlining and other systemic barriers to homeownership for people of color and other marginalized groups	***Not applicable***. This policy is more aspirational rather than an enforceable standard or requirement for individual projects. The Project is located on an infill site that is General Plan designated for the visitor serving uses contemplated by the Project. The City's General Plan designates other areas within the City to satisfy local and regional housing needs.
40	Advocate for and support programs that emphasize reducing housing cost burden (for renters and homeowners), with a focus on the	***Not applicable***. This policy is more aspirational rather than an enforceable standard or requirement for individual projects. This policy

Table 4.1-6. Project Potential to Conflict with Connect SoCal 2024

Policy Number	Policy Description	Potential to Conflict
	communities with the greatest needs and vulnerabilities.	is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. The Project is located on an infill site that is General Plan designated for the visitor serving uses contemplated by the Project. The City's General Plan designates other areas within the City to satisfy local and regional housing needs.
41	Support efforts to increase housing and services for people experiencing homelessness across the region.	***Not applicable***. This policy is more aspirational rather than an enforceable standard or requirement for individual projects. This policy is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. The Project is located on an infill site that is General Plan designated for the visitor serving uses contemplated by the Project. The City's General Plan designates other areas within the City to satisfy local and regional housing needs.
15-Minute Communities		
42	Promote 15-minute communities as places with a mix of complementary land uses and accessible mobility options that align with and support the diversity of places (or communities) across the region. These are communities where residents can either access their most basic, day-to-day needs within a 15-minute walk, bike ride or roll from their home or as places that result in fewer and shorter trips because of the proximity of complementary land uses.	***Not applicable***. This policy is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. It is also more aspirational rather than an enforceable standard or requirement for individual projects. The Project is located on an infill site that is General Plan designated for the visitor serving uses contemplated by the Project. The Project would offer employment opportunities near a major transportation corridor near existing transit.
43	Support communities across the region to realize 15-minute communities through incremental changes that improve equity, quality of life, public health, mobility, sustainability, resilience and economic vitality.	***Not applicable***. This policy is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. It is also more aspirational rather than an enforceable standard or requirement for individual projects. The Project is located on an infill site that is commercially zoned. The Project is located on an infill site that is General Plan designated for the visitor serving uses contemplated by the Project. The City's General Plan designates other areas within the City to satisfy local and regional housing needs and the other types of policies addressed in this policy.
44	Encourage efforts that elevate innovative	***Not applicable***. This policy is designed to be

Table 4.1-6. Project Potential to Conflict with Connect SoCal 2024

Policy Number	Policy Description	Potential to Conflict
	approaches to increasing access to neighborhood destinations and amenities through an array of people-centered mobility options	implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. It is also more aspirational rather than an enforceable standard or requirement for individual projects. The Project is located on an infill site in a transit priority area that is General Plan designated for the visitor serving uses contemplated by the Project. The Project would offer employment and visitor serving uses near a major transportation corridor that is near existing transit.
Equitable Engagement and Decision-Making		
45	Advance community-centered interventions, resources and programming that serve the most disadvantaged communities and people in the region, like Priority Equity Communities, with strategies that can be implemented in the short-to-long-term.	***Not applicable.*** This policy is intended to be carried out by public agencies such as SCAG, County Transportation Commissions, or local governments. The Project does not conflict with this policy as the Project site has long been General Plan designated for the proposed visitor serving use; it is located in a transit priority area and it is not located in a Priority Equity Community.
46	Promote racial equity that is grounded in the recognition of the past and current harms of systemic racism and one that advances restorative justice.	***Not applicable.*** This policy is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. This policy is more aspirational rather than an enforceable standard or requirement for individual projects. The Project does not preclude SCAG's ability to implement this policy and would not conflict with this policy.
47	Increase equitable, inclusive, and meaningful representation and participation of people of color and disadvantaged communities in planning processes.	***Not applicable.*** This policy reflects an aspirational goal rather than enforceable standards or requirements for individual development projects. The Project does not preclude SCAG's ability to implement this policy and would not conflict with this policy.
Environment		
Sustainable Development		
48	Promote sustainable development and best practices that enhance resource conservation, reduce resource consumption and promote resilience.	***Not applicable***. This is a region-wide measure. This policy reflects an aspirational goal rather than enforceable standards or requirements for individual development projects. The Project does not preclude SCAG's ability to implement this policy and would not conflict with this policy.

Table 4.1-6. Project Potential to Conflict with Connect SoCal 2024

Policy Number	Policy Description	Potential to Conflict
		Nonetheless, the Project would be designed to comply with current Title 24 standards, which continue to become more stringent over time. It also incorporates PDFs that promote resource conservation and the use of sustainable building materials. Additionally, during construction MM GHG-1 to MM GHG-3 would require the use of specific electric construction equipment, energy efficiency in the construction office(s), and construction debris recycling which would serve to conserve resources. During Project operations, MM GHG-4 to MM GHG-14 would promote EV charging, reduce guest vehicle trips, limit heavy-duty diesel trucks, encourage building energy efficiencies, include renewable energy, conserve water, and reduce waste which would serve to make the Project more sustainable during its operational life. The above measures represent best practices for resource conservation and reduction in resource consumption..
49	Support communities across the region to advance innovative sustainable development practices.	***Not applicable***. This is a region-wide measure. This policy reflects an aspirational goal rather than enforceable standards or requirements for individual development projects. The Project does not preclude SCAG's ability to implement this policy and would not conflict with this policy. Nonetheless, as described under Policy 48, the Project includes project features and mitigation measures that would further advance sustainable development practices.
50	Recognize and support the diversity of communities across the region by promoting local place-making, planning and development efforts that advance equity, mobility, resilience and sustainability.	***Not applicable***. This is a region-wide measure. This policy reflects an aspirational goal rather than enforceable standards or requirements for individual development projects. The Project does not preclude SCAG's ability to implement this policy and would not conflict with this policy. Nonetheless, as described under Policy 48, includes design features and mitigation measures that would advance mobility and sustainable development efforts.
Air Quality		
51	Reduce hazardous air pollutants and greenhouse gas emissions and improve air	***No conflict with mitigation***. As a hotel, the Project is not a source of substantial

Table 4.1-6. Project Potential to Conflict with Connect SoCal 2024

Policy Number	Policy Description	Potential to Conflict
	quality throughout the region through planning and implementation efforts.	hazardous air pollutants. The Project's CEQA analysis that is the subject of the Writ demonstrates that the Project has potentially significant air quality impacts prior to mitigation but less than significant air quality impacts with mitigation. The Project would potentially conflict with this policy if it did not reduce GHG emissions through planning and implementation efforts. As previously described, the Project is consistent with the General Plan land use designation, will be constructed on an infill site within a transit priority area near existing transit that would serve to support planning efforts to reduce GHG emissions through planning. Additionally, to further reduce GHGs, the Project also includes MM-GHG-1 through MM-GHG-14 that would serve to reduce GHG emissions.. The Project includes PDFs during construction that serve to increase fuel efficiencies and generate less criteria air pollutant emissions. With implementation of these measures Project would not conflict with this policy.
52	Support investments that reduce hazardous air pollutants and greenhouse gas emissions.	***No conflict with mitigation***. See the response to Policy 51. The Project would also invest in EV charging facilities and renewable energy system through MM-GHG-4 and MM-GHG-9, respectively. In addition, the Project would invest in building energy efficiencies above regulatory standards through MM-GHG-7. With implementation of these measures Project would not conflict with this policy.
53	Reduce the exposure and impacts of emissions and pollutants and promote local and regional efforts that improve air quality for vulnerable populations, including but not limited to Priority Equity Communities and the AB 617 Communities.	***Not applicable***. The Project is not located within a Priority Equity Community or an AB 617 community. Nonetheless, the Project would invest in technologies, project design features, and mitigation measures that reduce GHG emissions.
Clean Transportation		
54	Accelerate the deployment of a zero-emission transportation system and use near-zero-emission technology to offer short-term benefits where zero-emissions solutions are not yet feasible or commercially viable.	***No conflict with mitigation***. This is a region wide measure; however, the Project would potentially conflict with this measure if it did not incorporate technologies to encourage EV use. The Project would implement MM-GHG-4 that requires EV charging facilities that exceed Title 24 requirements and MM-GHG-9 requiring on site renewable energy generation thus helping

Table 4.1-6. Project Potential to Conflict with Connect SoCal 2024

Policy Number	Policy Description	Potential to Conflict
		to accelerate zero-emission transportation. With implementation of these measures Project would not conflict with this policy.
55	Promote equitable use of and access to clean transportation technologies so that all may benefit from them.	***Not applicable***. This is a region wide measure however, the Project would not limit SCAG's ability to promote the equitable use of and access to clean transportation technologies. Nonetheless, the Project would provide access to EV charging facilities to its guests and employees, which would support this policy.
56	Consider the full environmental life cycle of clean transportation technologies, including upstream production and end of life as an important part of meeting SCAG's objectives in economic development and recovery, resilience planning and achievement of equity.	***Not applicable***. This policy is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. As such they are beyond the control of a single project applicant Nonetheless, the Project incorporates several GHG reduction strategies, including EV charging infrastructure, solar energy generation, grey water recycling, and advanced building energy efficiency measures. These features demonstrate a commitment to sustainability and align with the SCAG's policy No. 56, which emphasizes the importance of considering the full environmental life cycle of clean transportation technologies. By integrating EV charging stations, the Project supports the adoption of zero-emission vehicles, contributing to reduced tailpipe GHG emissions. The use of solar energy and energy-efficient building systems reduces reliance on fossil fuels and lowers upstream GHG emissions associated with other forms of non-renewable electricity generation. Grey water recycling further enhances resource conservation and resilience. Although this policy is not applicable at the project-level the Project supports this Policy's objectives in economic development, climate resilience, and equity.
57	Maintain a technology-neutral approach in the study of, advancement of and investment in clean transportation technology.	***Not applicable*** This is a region wide measure and not applicable at the project-level. Nonetheless, by incorporating a range of sustainable features and mitigation measures—such as EV charging infrastructure, solar energy systems, grey water recycling, and energy-efficient building design—the Project supports the Policy of maintaining a technology-neutral approach in the study of,

Table 4.1-6. Project Potential to Conflict with Connect SoCal 2024

Policy Number	Policy Description	Potential to Conflict
		advancement of, and investment in clean transportation technology.
Natural Agricultural Lands Preservation		
58	Prioritize the climate mitigation, adaptation, resilience and economic benefits of natural and agricultural lands in the region.	***Not applicable***. The Project is an infill development on a previously developed site that has not supported and will not support natural or agricultural lands.
59	Support conservation of habitats that are prone to hazards exacerbated by climate change, such as wildfires and flooding.	***Not applicable***. The Project is an infill development on a previously developed site that does not impact habitats that are prone to hazards exacerbated by climate change such as wildfires or flooding.
60	Support regional conservation planning and collaboration across the region.	***Not applicable***. The Project is an infill development on a previously developed property without sensitive habitat or species. The Project does not preclude SCAG's ability to support regional conservation planning and collaboration across the region.
61	Encourage the protection and restoration of natural habitat and wildlife corridors	***Not applicable***. The Project is an infill development on a previously developed site without natural habitats or wildlife corridors. The Project does not preclude SCAG's ability to encourage the protection and restoration of natural habitat and wildlife corridors.
62	Encourage the conservation and viability of agricultural lands to protect the regional and local food supply and ensure the sustainability of local agriculture as a vital part of the region's economy.	***Not applicable***. The Project is an infill development on a previously developed site that does not qualify as agricultural land. The Project does not preclude SCAG's ability to encourage the conservation and viability of agricultural lands to protect the regional and local food supply and ensure the sustainability of local agriculture as a vital part of the region's economy.
63	Encourage policy development of the link between natural and agricultural conservation with public health.	***Not applicable.*** The Project is an infill development on a previously developed site that does not qualify as agricultural land. The Project does not preclude SCAG's ability to encourage policy development of the link between natural and agricultural conservation with public health.
Climate Resilience		
64	Prioritize the most vulnerable populations and communities subject to climate hazards to help the people, places and infrastructure that are most at risk for climate change impacts. In doing so, recognize that disadvantaged communities are often overburdened	***Not applicable***. This policy is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. As such they are beyond the control of a single project applicant. The Project would not preclude

Table 4.1-6. Project Potential to Conflict with Connect SoCal 2024

Policy Number	Policy Description	Potential to Conflict
		SCAG's ability to prioritize vulnerable populations and communities subject to climate hazards. Nonetheless, by incorporating EV charging, solar energy, grey water recycling, and energy-efficient systems and other features, the Project reduces greenhouse gas emissions and resource consumption in a manner that supports this climate resilience policy.
65	Support local and regional climate and hazard planning and implementation efforts for transportation, land use, and other factors.	***Not applicable***. This policy is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. As such they are beyond the control of a single project applicant. Nonetheless, the Project incorporates design and operational features that directly support local and regional climate and hazard planning goals. Through the integration of solar energy systems, grey water recycling, EV charging infrastructure, and energy-efficient building technologies, the project contributes to broader efforts to reduce greenhouse gas emissions, conserve resources, and enhance climate resilience. These measures not only reduce the environmental footprint of the development but also support regional strategies for sustainable land use and transportation. By proactively addressing climate-related risks and aligning with hazard mitigation best practices, the Project does not conflict with SCAG's regional planning objectives.
66	Support nature-based solutions to increase regional resilience of the natural and built environment	***Not applicable***. The Project is an infill development in an urban environment on a previously developed site and would not preclude SCAG's ability to support nature-based solutions.
67	Promote sustainable water use planning, practices and storage that improve regional water security and resilience in a drier environment	***Not applicable.*** This policy is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. As such they are beyond the control of a single project applicant. Nonetheless, the Project does not conflict with this policy as the Project must comply with all water conservation regulations and includes MM-GHG-7 (grey water recycling) and MM-GHG-10 (water conservation), which would support this policy.

Table 4.1-6. Project Potential to Conflict with Connect SoCal 2024

Policy Number	Policy Description	Potential to Conflict
68	Support an integrated planning approach to help local jurisdictions meet housing production needs in a drier environment.	***Not applicable***. This policy is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. As such they are beyond the control of a single project applicant. The Project does not preclude SCAG's ability to support integrated planning approaches for developing more housing in drier environments. The Project is located within a commercial district specifically designated as a location for visitor serving uses like the Project. Additionally, the Project includes water conservation measures such as MM-GHG-10, which would support this policy.
Economy		
Goods Movement		
69	Leverage and prioritize investments, particularly where there are mutual co-benefits to both freight and passenger/commuter rail.	***Not applicable***. This policy is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. The Project is not located near freight or passenger/commuter rail and does not involve the development of rail transportation.
70	Prioritize community and environmental justice concerns, together with economic needs, and support workforce development opportunities, particularly around deployment of zero-emission and clean technologies and their supporting infrastructure.	***Not applicable.*** This policy is intended to be carried out by public agencies such as SCAG, County Transportation Commissions, or local governments. Further, this policy reflects an aspirational goal rather than enforceable standards or requirements for individual development projects. However, the Project would support this policy through development consistent with the General Plan designation for the Project site, its proximity to transit and other visitor servicing uses.
71	Explore and advance the transition toward zero-emission and clean technologies and other transformative technologies, where viable.	***Not applicable.*** This policy is intended to be carried out by public agencies such as SCAG, County Transportation Commissions, or local governments, as such it beyond the scope and control of a single project applicant. Further, this policy reflects an aspirational goal rather than enforceable standards or requirements for individual development projects. Nonetheless, the Project would support this policy through its incorporation of on-site solar facilities, and compliance with the PDFs and mitigation measures including MM-GHG-4,

Table 4.1-6. Project Potential to Conflict with Connect SoCal 2024

Policy Number	Policy Description	Potential to Conflict
		which provides EV charging infrastructure and MM-GHG-12 that incorporates the use of zero-emission landscape equipment.
72	Advance comprehensive, systems-level planning of corridor/supply chain operational strategies that is integrated with road and rail infrastructure and inland port concepts	***Not applicable.*** This policy is intended to be carried out by public agencies such as SCAG, County Transportation Commissions, or local governments. Further, this policy reflects an aspirational goal rather than enforceable standards or requirements for individual development projects.
73	Ensure continued, significant investment in a safe, secure, clean and efficient transportation system—including both highways and rail—to support the intermodal movement of goods across the region.	***Not applicable.*** This policy is intended to be carried out by public agencies such as SCAG, County Transportation Commissions, or local governments. Further, this policy reflects an aspirational goal rather than enforceable standards or requirements for individual development projects.
Broadband		
74	Support ubiquitous regional broadband deployment and access to provide the necessary infrastructure and capability for Smart Cities strategies—to ensure the benefits of these strategies improve safety and are distributed equitably.	***Not applicable.*** This broadband policy is intended to be carried out by public agencies such as SCAG, County Transportation Commissions, or local governments. The Project is an infill development that does not conflict with this policy.
75	Develop networks that are efficient, scalable, resilient and sustainable to support transportation systems management, operations services and "tele-everything" strategies that reduce vehicle miles traveled, optimize efficiency and accommodate future growth of regional economies.	***Not applicable.*** This broadband policy is intended to be carried out by public agencies such as SCAG, County Transportation Commissions, or local governments. The Project is an infill development that does not conflict with this policy.
76	Encourage investments that provide access to digital activities that support educational, financial and economic growth.	***Not applicable.*** This broadband policy is intended to be carried out by public agencies such as SCAG, County Transportation Commissions, or local governments. The Project is an infill development that does not conflict with this policy.
77	Advocate for current, accurate data to identify opportunity zones and solutions that support the development of broadband services to community anchor institutions and local businesses	***Not applicable.*** This broadband policy is intended to be carried out by public agencies such as SCAG, County Transportation Commissions, or local governments. The Project does not conflict with this policy.
78	Promote an atmosphere that allows for healthy competition and speed-driven innovative solutions while remaining technologically neutral	***Not applicable.*** This broadband policy is intended to be carried out by public agencies such as SCAG, County Transportation Commissions, or local governments. The Project does not conflict with this policy.

Table 4.1-6. Project Potential to Conflict with Connect SoCal 2024

Policy Number	Policy Description	Potential to Conflict
79	Use a bottom-up approach to identify and support a community's broadband needs.	***Not applicable.*** This broadband policy is intended to be carried out by public agencies such as SCAG, County Transportation Commissions, or local governments, as such it beyond the scope and control of a single project applicant.
Universal Basic Mobility		
80	Encourage partnerships and policies to broaden safe and efficient access to a range of mobility services that improve connections to jobs, education and basic services	***Not applicable.*** This policy is intended to be carried out by public agencies such as SCAG, County Transportation Commissions, or local governments. Further, this policy reflects an aspirational goal rather than enforceable standards or requirements for individual development projects.
81	Promote increased payment credentials for disadvantaged community members and the transition of cash users to digital payment technologies to address payment barriers	***Not applicable.*** This policy is intended to be carried out by public agencies such as SCAG, County Transportation Commissions, or local governments. Further, this policy reflects an aspirational goal rather than enforceable standards or requirements for individual development projects.
Workforce Development		
82	Foster a positive business climate by promoting regional collaboration in workforce and economic development between cities, counties, educational institutions and employers	***Not applicable.*** This policy is intended to be carried out by public agencies such as SCAG, County Transportation Commissions, or local governments. Further, this policy reflects an aspirational goal rather than enforceable standards or requirements for individual development projects.
83	Encourage inclusive workforce development that promotes upward economic mobility.	***Not applicable.*** This policy is intended to be carried out by public agencies such as SCAG, County Transportation Commissions, or local governments. Further, this policy reflects an aspirational goal rather than enforceable standards or requirements for individual development projects.
84	Support entrepreneurial growth with a focus on underrepresented communities.	***Not applicable.*** This policy is intended to be carried out by public agencies such as SCAG, County Transportation Commissions, or local governments. Further, this policy reflects an aspirational goal rather than enforceable standards or requirements for individual development projects.
85	Foster a resilient workforce that is poised to effectively respond to changing economic conditions (e.g., market dynamics, technological advances and climate change).	***Not applicable.*** This policy is intended to be carried out by public agencies such as SCAG, County Transportation Commissions, or local governments. Further, this policy reflects an

Table 4.1-6. Project Potential to Conflict with Connect SoCal 2024

Policy Number	Policy Description	Potential to Conflict
		aspirational goal rather than enforceable standards or requirements for individual development projects.
86	Inform and facilitate data-driven decision-making about the region's workforce.	***Not applicable.*** This policy is intended to be carried out by public agencies such as SCAG, County Transportation Commissions, or local governments as opposed to an individual development project.
Tourism		
87	Consult and collaborate with state, county and local agencies within the region that are charged with promoting tourism and transportation.	***Not applicable.*** This policy is intended to be carried out by public agencies such as SCAG, County Transportation Commissions, or local governments. Consistent with the General Plan designation, the Project proposes a hotel that would support tourism.
88	Encourage the reduced use of cars by visitors to the region by working with state, county and local agencies (e.g., park services, transportation agencies) to highlight and increase access to alternative options, including transit, passenger rail and active transportation.	***No conflict with mitigation.*** The Project proposes visitor serving uses on a site designated by the General Plan for such a use that is also located in a transit priority area, near other visitor serving uses. The Project would potentially conflict with this policy if it did not promote transportation alternatives to guests visiting the region. The Project includes MM-GHG-5, which would serve to reduce vehicle trips by guests by promoting alternative transportation. With MM-GHG-5, the Project would not conflict with this policy.

Source: SCAG 2024.
Notes: SCAG = Southern California Association of Governments; MM = mitigation measure; GHG = greenhouse gas; CTR = Commute Trip Reduction; TDM = transportation demand management; SOV = single-occupancy vehicle; EV = electric vehicle; CEQA = California Environmental Quality Act; PDF = Project Design Feature.

Based on the analysis above, the Project has the potential to conflict with the SCAG 2024–2050 RTP/SCS. This is a potentially significant impact, and as such, mitigation is required to reduce the potential conflicts to a less than significant level.

Potential to Conflict with State Reduction Targets and CARB's Scoping Plan

The California State Legislature passed AB 32 to provide initial direction to limit California's GHG emissions to 1990 levels by 2020 and initiate the state's long-range climate objectives. Since the passage of AB 32, the state has adopted GHG emissions reduction targets for future years beyond the initial 2020 horizon year. CARB is required to develop a Scoping Plan, which provides the framework for actions to achieve the state's GHG emission targets. While the Scoping Plan is not directly applicable to specific projects, nor is it intended to be used as the sole basis for project-level evaluations, it is the official framework for the measures and regulations that will be implemented to reduce California's GHG emissions in alignment with the adopted targets. Therefore,

a project would be found to not conflict with the statutes if it meets the Scoping Plan policies and would not impede attainment of the goals therein.

For the Project, the relevant GHG emissions reduction targets include those established by SB 32 and AB 1279, which require GHG emissions to be reduced to 40% below 1990 levels by 2030, and 85% below 1990 levels by 2045, respectively. In addition, AB 1279 requires the state to achieve net zero GHG emissions by no later than 2045 and achieve and maintain net negative GHG emissions thereafter. CARB's 2017 Scoping Plan update was the first to address the state's strategy for achieving the 2030 GHG reduction target set forth in SB 32 (CARB 2017a), and the most recent CARB 2022 Scoping Plan update outlines the state's plan to reduce emissions and achieve carbon neutrality by 2045 in alignment with AB 1279 and assesses progress is making toward the 2030 SB 32 target (CARB 2022). As such, given that SB 32 and AB 1279 are the relevant GHG emission targets, the 2017 and 2022 Scoping Plan updates that outline the strategy to achieve those targets, are the most applicable to the Project.

The 2017 Scoping Plan included measures to promote renewable energy and energy efficiency (including the mandates of SB 350), increase stringency of the low-carbon fuel standard, measures identified in the Mobile Source and Freight Strategies, measures identified in the proposed SLCP Plan, and increase stringency of SB 375 targets. The 2022 Scoping Plan builds upon and accelerates programs currently in place, including moving to zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high GWP; providing communities with sustainable options for walking, biking, and public transit; and displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines) (CARB 2022). Many of the measures and programs included in the Scoping Plan would result in the reduction of project-related GHG emissions with no action required at the project level, including GHG emission reductions through increased energy efficiency and renewable energy production (SB 350), reduction in carbon intensity of transportation fuels (low-carbon fuel standard), and the accelerated efficiency and electrification of the statewide vehicle fleet (Mobile Source Strategy).

Table 4.1-7 highlights the measures from the 2022 Scoping Plan that are relevant to the Project and demonstrates that the Project would not conflict with the 2022 Scoping Plan with implementation of the described mitigation measures.

Table 4.1-7. Project Potential to Conflict with 2022 Scoping Plan

Sector	Action	Potential to Conflict
GHG Emissions Reductions Relative to the SB 32 Target	40% below 1990 levels by 2030	***No conflict with mitigation***. While the SB 32 GHG emissions reduction target is not an Action that is analyzed independently, it is included in Table 2-1 of the 2022 Scoping Plan for reference. As the analysis in this report demonstrates, including the Project's consistency with the RTP/SCS and the measures adopted to reduce GHG emissions, the Project would not obstruct or interfere with efforts to meet the SB 32 reduction goal.
Smart Growth / VMT	VMT per capita reduced 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045	***No conflict with mitigation***. The VMT goals outlined in the Scoping Plan are being pursued through a multi-prong approach that includes transforming land use and

Table 4.1-7. Project Potential to Conflict with 2022 Scoping Plan

Sector	Action	Potential to Conflict
		mobility options. The State is encouraging compact, infill development near high quality transit corridors to reduce VMT. The Project would not obstruct or interfere with agency efforts to meet this regional VMT reduction goal, including through implementation of SB 375. The Project is a General Plan land use consistent infill commercial development within a TPA [it is located within half a mile of a major transit stop (Harbor Boulevard and Chapman Avenue intersection), based on the frequency of bus services in the City]. These characteristics would be considered smart growth and supportive of the State's approach for achieving these VMT targets. However, as disclosed in Section 4.2 of the SEIR, the Project would have a potentially significant VMT impact which would result in a potential conflict with this strategy. The Project would implement TRA-1 and TRA-2 to reduce the VMT impact to a less than significant level. With the implementation of these mitigation measures, the Project would not conflict with this strategy.
Light-duty Vehicle (LDV) Zero Emission Vehicles (ZEVs)	100% of LDV sales are ZEV by 2035	***Not applicable***. This action pertains to automakers and LDV sales within California. The Project would not obstruct or interfere with its implementation. Nonetheless, the Project would support the transition from fossil fuel LDV to ZEV through compliance with regulations and its provision of reserved parking for EVs (MM-TRA-1) and EV chargers (MM GHG-4).
Truck ZEVs	100% of medium-duty vehicle (MDV)/ heavy-duty vehicle (HDV) sales are ZEV by 2040	***Not applicable***. This action pertains to automakers and MDV and HDV sales within California. The Project would not obstruct or interfere with its implementation.
Electricity Generation	Sector GHG target of 38 million metric tons of carbon dioxide equivalent (MMT CO_2e) in 2030 and 30 MMT CO_2e in 2035 Retail sales load coverage[1] 20 gigawatts (GW) of offshore wind by 2045	***Not applicable.*** This action pertains to the statewide procurement of renewably generated electricity. The Project would not obstruct or interfere with its implementation. Nonetheless, the Project would support increased generation of renewable electricity through the installation of on-site solar panels and/or other means

Table 4.1-7. Project Potential to Conflict with 2022 Scoping Plan

Sector	Action	Potential to Conflict
	Meet increased demand for electrification without new fossil gas-fired resources	sufficient to generate up to 267,000 kWh of electricity per year (MM GHG-9). Additionally, the Project would be designed to be energy efficient (MM-GHG-7), which would serve to reduce overall electricity demand.
New Residential and Commercial Buildings	All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030	***Not applicable***. The Project would be developed before the 2029 trigger date. Nonetheless, appliances within the Project will be largely electric.
Construction Equipment	25% of energy demand electrified by 2030 and 75% electrified by 2045	***Not applicable***. As this action pertains to the electrification of off-road equipment across California, the Project would not obstruct or interfere with its implementation.
Low Carbon Fuels for Transportation	Biomass supply is used to produce conventional and advanced biofuels, as well as hydrogen	***Not applicable***. As this action pertains to the statewide effort to use and develop low-cost fuels for use in the transportation sector across California, the Project would not obstruct or interfere with agency efforts to increase the provision of low carbon fuels for transportation.
Low Carbon Fuels for Buildings and Industry	In 2030s biomethane blended in pipeline Renewable hydrogen blended in fossil gas pipeline at 7% energy (~20% by volume), ramping up between 2030 and 2040 In 2030s, dedicated hydrogen pipelines constructed to serve certain industrial clusters	***Not applicable***. As this action pertains to the statewide effort to use and develop low-cost fuels for building and industry sectors across California, the Project would not obstruct or interfere with agency efforts to increase the provision of low carbon fuels for use in buildings and industry.
High GWP Potential Emissions	Low GWP refrigerants introduced as building electrification increases, mitigating HFC emissions	***Not applicable***. This action pertains to statewide efforts to develop Low GWP refrigerants and CARB regulations to decrease higher GWP refrigerants. The Project would not obstruct or interfere with efforts to introduce low GWP refrigerants and regulations. While this action may not be directly applicable, the Project includes MM-GHG-14, which supports the intent of the action by reducing refrigerant emissions through the use of low-GWP refrigerants and a refrigerant management program.

Based on the analysis in Table 4.1-7, the Project would potentially conflict with the 2022 Scoping Plan prior to mitigation. This is a potentially significant impact, and as such, mitigation is required to reduce the potential conflicts to a less than significant level.

The 2045 carbon neutrality goal required CARB to expand proposed actions in the 2022 Scoping Plan to include those that capture and store carbon in addition to those that reduce only anthropogenic sources of GHG emissions. However, the 2022 Scoping Plan emphasizes that reliance on carbon sequestration in the state's natural and working lands will not be sufficient to address residual GHG emissions, and achieving carbon neutrality will require research, development, and deployment of additional methods to capture atmospheric GHG emissions (e.g., mechanical direct air capture). Overall, the Project would comply will all regulations adopted in furtherance of the Scoping Plan to the extent applicable and required by law. As demonstrated above, the Project would potentially conflict with CARB's 2022 Scoping Plan and with the state's ability to achieve the 2030 and 2045 GHG reduction and carbon neutrality goals prior to mitigation. This is a potentially significant impact, and as such, mitigation is imposed that reduced those potential impacts to less than significant.

Potential to Conflict with City of Garden Grove General Plan

The City of Garden Grove General Plan does not include a greenhouse gas (GHG) reduction element, but many of its goals, policies, and implementation measures support GHG reduction as a co-benefit. These strategies align with state and regional climate goals by promoting sustainable land use, transportation, energy efficiency, and resource conservation. Table 4.1-8 presents the Project's potential to conflict with applicable GHG reduction related goals, policies, and implementation measures from the City's General Plan.

Table 4.1-8. Project Potential to Conflict with City of Garden Grove General Plan

General Plan Element/Type	General Plan Number	Description	Potential to Conflict
Air Quality Element			
Goal	AQ-4	Efficient development that promotes alternative modes of transportation, while ensuring that economic development goals are not sacrificed.	*No conflict with mitigation*. The Project is located on a previously developed infill site in a TPA near existing transit and is consistent with the General Plan land use designation. These Project characteristics would be supportive of this goal. However, the Project could generate substantial VMT from guests and employees, potentially conflicting with the City's goal to reduce emissions through efficient development and alternative transportation. The Project would and include measures to promote alternative transportation, such as MM-TRA-1, MM-TRA-2, and MM-GHG-5 to address the potential conflict. With the implementation of these

Table 4.1-8. Project Potential to Conflict with City of Garden Grove General Plan

General Plan Element/Type	General Plan Number	Description	Potential to Conflict
			measures, the Project would not conflict with this goal.
Policy	AQ-4.1	Review site developments to ensure pedestrian safety and promote non-automotive users.	***No conflict with mitigation.*** The Project includes PDFs to ensure pedestrian safety and the promotion of alternatives to automotive transportation. MM-TRA-2 and MM-GHG-5 require the inclusion of safe pedestrian and bicycle access and connections to adjacent uses.
Implementation	AQ-IMP-4C	Require sidewalks through parking lots, bicycle racks near building entrances and other provisions for the safety and convenience of pedestrian and bicycle riders at all commercial, mixed use, and production facilities.	***No conflict with mitigation.*** The Project includes MM-GHG-5 that requires the inclusion of safe pedestrian and bicycle access and bicycle parking and MM-TRA-2 that requires bicycle parking. Implementation of these mitigation measures would address the potential conflict.
Goal	AQ-5	An improved balance of residential, commercial, industrial, recreational, and institutional uses to satisfy the needs of the social and economic segments of the population. Work towards clean air while still permitting reasonable planned growth.	***No conflict with mitigation.*** The Project would construct a new resort hotel use within an infill developed area that is General Plan designated for such a visitor serving use within a TPA. These characteristics would support this goal, however without the inclusion of measures to reduce GHG emissions, the Project would potentially conflict with this goal. The Project incorporates project design features and MM-GHG-1 through MM-GHG-14 to reduce emissions from construction and operation of the Project. With implementation of these measures, the Project would not conflict with this policy.
Policy	AQ-5.2	Encourage infill development projects within urbanized areas that include jobs centers and transportation nodes.	***No conflict.*** The Project will create additional jobs and is located on an infill site within an urbanized area near existing transit lines and other job centers.

Table 4.1-8. Project Potential to Conflict with City of Garden Grove General Plan

General Plan Element/Type	General Plan Number	Description	Potential to Conflict
Policy	AQ-5.6	Increase residential and commercial densities around bus and/or rail transit stations, and along major arterial corridors.	***No conflict***. The Project would construct a new commercial use near existing transit lines and major arterial corridors.
Goal	AQ-6	Increased energy efficiency and conservation.	***No conflict with mitigation***. The Project would be built to current Title 24 standards at the time building permits are issued. The City's goal is addressing increased energy efficiency and conservation. The Project would potentially conflict with this goal without the inclusion of energy efficiency and conservation measures that go beyond regulatory requirements. The Project includes project design features and mitigation measures such as MM-GHG-7 which includes increased building energy efficiencies that serve to reduce and conserve energy use as well as generate on-site renewable energy.
Policy	AQ-6.1	Develop incentives and/or regulations regarding energy conservation requirements for private and public developments.	***No conflict with mitigation***. See response to Goal AQ-6. The Project would not prevent the City from implementing this policy.
Policy	AQ-6.2	Promote energy conservation and disseminate information throughout the community about energy conservation measures.	***No conflict with mitigation***. See response to Goal AQ-6. The Project would not prevent the City from implementing this policy.
Implementation	AQ-IMP-6D	Require new development to comply with the energy use guidelines in Title 24 of the California Administrative Code.	***No conflict***. The Project would be built to current Title 24 standards at the time building permits are issued. Additionally, the Project includes MM-GHG-7, which would include building energy efficiencies that serve to further reduce and conserve energy use.

Table 4.1-8. Project Potential to Conflict with City of Garden Grove General Plan

General Plan Element/Type	General Plan Number	Description	Potential to Conflict
Conservation Element			
Goal	CON-1	Garden Grove's water resources shall be conserved to ensure equitable amounts of clean water for all users.	***No conflict with mitigation***. Although the Project is located on a previously developed infill site and the resort hotels use is consistent with the General Plan designation for the Project site. The Project must comply with all applicable water conservation regulations and it includes grey water recycling and water conservation measures in MM-GHG-10, which requires a minimum 10% reduction in water use compared to baseline demand. The reduction would be achieved through low-flow fixtures, smart irrigation systems, and greywater recycling. These measures directly support water conservation and reduce the Project's impact on local water supplies. By integrating sustainable water management practices, the Project would not conflict with the City's goal of ensuring equitable and efficient use of water resources.
Policy	CON-1.2	Reduce the waste of potable water through efficient technologies, conservation efforts, and design and management practices, and by better matching the source and quality of water to the user's needs.	***No conflict with mitigation***. See response to Goal CON-1. Notably, the use of grey water recycling would be considered an efficient technology to reduce potable water use. The Project would not conflict with this policy with implementation of MM-GHG-10.
Policy	CON-1.3	Promote water conservation in new development or redevelopment project design, construction, and operations.	***No conflict with mitigation***. See response to Goal CON-1. MM-GHG-10 requires the implementation of water conservation measures. The Project would not conflict with this policy with implementation of MM-GHG-10.
Policy	CON-1.4	Continue to implement a Water Conservation Program.	***Not applicable***. This is a City-wide measure. The Project would not prevent the City from implementing this policy. The

Table 4.1-8. Project Potential to Conflict with City of Garden Grove General Plan

General Plan Element/Type	General Plan Number	Description	Potential to Conflict
			Project must comply with all applicable water conservation regulations and programs the City develops. Although this policy is not specifically applicable to the Project, the Project includes water conservation measures through MM-GHG-10, and thus, would not conflict with this policy.
Implementation	CON-IMP-1B	Require on-site infiltration whenever feasible for new development or redevelopment projects.	***Not conflict***. The Project would not prevent the City from implementing this policy. The Project must comply with all applicable on-site filtration requirements of the City and other applicable agencies. Although this policy is not specifically applicable at the project-level, the Project includes MM-GHG-8, which could include permeable surfaces to allow greater infiltration.
Implementation	CON-IMP-1C	Promote site-appropriate, low water-use, and drought-tolerant native plants city-wide.	***Not conflict***. The Project would not prevent the City from implementing this policy and the Project design contemplates landscaping as described by this policy. Nonetheless, the Project includes MM-GHG-10, which would require low water use and drought-tolerant plants in the landscaping plans for the Project.
Implementation	CON-IMP-1F	Promote cost-saving conservation measures such as low-flow fixtures, waterless urinals, and other techniques that extend scarce supplies for all homes and businesses.	***Not applicable***. This is a City-wide measure. The Project would not prevent the City from implementing this policy. Nonetheless, The Project includes MM-GHG-10, which would require low-flow water fixtures.
Goal	CON-2	Protect and improve water quality.	***No conflict***. The Project would comply with applicable regulations for protecting water quality during construction and operation. Protecting water

Table 4.1-8. Project Potential to Conflict with City of Garden Grove General Plan

General Plan Element/Type	General Plan Number	Description	Potential to Conflict
			quality through stormwater management helps to reduce more energy-intensive stormwater treatment.
Policy	CON-2.1	Enhance water infiltration throughout watersheds by decreasing accelerated runoff rates and enhancing groundwater recharge.	***Not applicable***. This is a City-wide measure. The Project would not interfere with the City's ability to implement this policy. Nonetheless, the Project would comply with applicable City standards and implement MM-GHG-8 to provide a mechanism for considering the use of permeable surfaces.
Policy	CON-2.2	Encourage practices that enable water to percolate into the surrounding soil, instead of letting sediment, metals, pesticides, and chemicals runoff directly into the storm drain system.	***Not applicable.*** This is a City-wide measure. The Project would not interfere with the City's ability to implement this policy and would comply with applicable City standards. Nonetheless, the Project would implement MM-GHG-8 to provide a mechanism for considering the use of permeable surfaces as a cool deck.
Implementation	CON-IMP-2D	Minimize impervious surfaces for new development, and incorporate technologies such as pervious paving, landscaped roofs, planter boxes, and rainwater capture and reuse.	***No conflict***. The Project would not interfere with the City's ability to implement this policy and would comply with applicable City standards. Nonetheless, MM-GHG-8 would provide a mechanism for considering the use of permeable surfaces as a cool deck.
Goal	CON-3	Reduce total waste diverted to treatment or disposal at the waste source and through re-use and recycling.	***No conflict with mitigation***. The Project must comply with all applicable waste diversion regulations. However, without the inclusion of additional waste reduction measures, the Project would potentially conflict with this goal. The Project would implement MM-GHG-3 to increase construction debris recycling above the City standard and MM-GHG-11 to reduce operational

Table 4.1-8. Project Potential to Conflict with City of Garden Grove General Plan

General Plan Element/Type	General Plan Number	Description	Potential to Conflict
			waste above current industry standards. With implementation of these measures, the Project would not conflict with this goal.
Policy	CON-3.1	Update as appropriate and continue to implement the Source Reduction and Recycling Element (SRRE) for the City.	***Not applicable***. This is not a project-specific policy. The Project would not interfere with the City's ability to implement this policy. Nonetheless, the Project would comply with all applicable waste diversion regulations and implement MM-GHG-3 to increase construction debris recycling above the City standard and MM-GHG-11 to reduce operational waste above current industry standards.
Policy	CON-3.4	Encourage the use of materials with minimal impacts to the environment for new development or redevelopment projects in the City.	***No conflict***. The Project includes PDF-27 that will prioritize sustainable building materials during material selection.
Implementation	CON-IMP-3D	Encourage the use of recycled or rapidly renewable materials, and building reuse and renovation over new construction, where feasible.	***No conflict***. The Project would not interfere with the City's ability to implement this policy. The Project includes PDF-27 that will prioritize sustainable building materials during material selection.
Goal	CON-4	Reduce per-capita non-renewable energy waste and city-wide peak electricity demand through energy efficiency and conservation.	***No conflict with mitigation***. Without the inclusion of measures to reduce non-renewable energy waste and reduce electricity demand the Project would potentially conflict with this goal. The Project includes Project design features that would serve to reduce non-renewable fuel use and reduce electricity use. Additionally, the Project includes MM-GHG-7, which would serve to reduce electricity demand through building efficiencies as well as MM-GHG-9 requiring on-

Table 4.1-8. Project Potential to Conflict with City of Garden Grove General Plan

General Plan Element/Type	General Plan Number	Description	Potential to Conflict
			site renewable energy generation. MM-GHG-10 serves to reduce water use which also indirectly reduces energy used to treat and supply water. With implementation of the above measure, the Project would not conflict with this goal.
Policy	CON-4.1	Integrate energy efficiency and conservation requirements that exceed State standards into the development review and building permit processes.	***Not applicable***. The City is responsible for integrating this policy into its development review and building permit process. The Project would not interfere with the City's ability to implement this policy. Nonetheless, the Project includes MM-GHG-7, which would require building energy efficiencies and MM-GHG-9 which requires on-site renewable energy generation.
Policy	CON-4.2	Create incentives such as expedited permit processing, technical assistance, and other methods that will encourage energy efficiency technology and practices.	***Not applicable***. The City is responsible for development of these incentives. The Project would not interfere with the City's ability to implement this policy.
Implementation	CON-IMP-4A	Adopt Energy Efficiency Standards for new and remodeled buildings that exceed Title 24 building standards.	***Not applicable***. The City is responsible for the adoption of energy efficiency standards. The Project would not interfere with the City's ability to implement this policy. Nonetheless, the Project includes MM-GHG-7 that would enhance building energy efficiencies consistent with this implementation measure.
Goal	CON-5	Reduce dependency on non-renewable energy resources through the use of local and imported alternative energy sources.	***No conflict with mitigation***. The Project would not interfere with the City's ability to implement this policy. However, without the inclusion of mitigation, the Project would potentially conflict with this goal.

Table 4.1-8. Project Potential to Conflict with City of Garden Grove General Plan

General Plan Element/Type	General Plan Number	Description	Potential to Conflict
			The Project includes MM-GHG-9, which requires the Project to provide a portion of its energy use from on-site renewable solar energy. With implementation of this measure, the Project would not conflict with this goal.
Policy	CON-5.1	Integrate technically and financially feasible renewable energy resources requirements into development and building standards.	***Not applicable***. The City is responsible for integrating renewable energy resource requirements into its development and building standards. The Project would not interfere with the City's ability to implement this policy. Nonetheless, the Project includes MM-GHG-9, which requires the Project to provide a portion of its energy use from on-site renewable solar energy. Although this policy is not applicable at the project-level, Implementation of this measure would be supportive of this policy.
Policy	CON-5.2	Promote renewable energy use through regulations, incentives, and available funding opportunities.	***Not applicable***. The City is responsible for development of incentives and regulations to promote renewable energy. Project would not interfere with the City's ability to implement this policy. Although this policy is not applicable at the project-level, the Project includes MM-GHG-9, which requires the Project to provide a portion of its energy use from on-site renewable solar energy; this measure would be supportive of this policy.
Policy	CON-5.3	Create opportunities for the purchase and development of local renewable energy resources.	***Not applicable***. The City is responsible for creating opportunities for the purchase and development of local renewable energy resources. The Project would not interfere with the City's ability to implement this policy.

Table 4.1-8. Project Potential to Conflict with City of Garden Grove General Plan

General Plan Element/Type	General Plan Number	Description	Potential to Conflict
			Although this policy is not applicable at the project-level, the Project includes MM-GHG-9, which requires the Project to provide a portion of its energy use from on-site renewable solar energy; this measure would not conflict with this policy.
Implementation	CON-IMP-5G	Encourage renewable technologies through streamlined planning and development rules, codes, and processes.	***Not applicable***. The City is responsible for implementation of this measure. The Project would not interfere with the City's ability to implement this policy. Nonetheless, the Project includes MM-GHG-9, which would require the Project to provide a portion of its energy use from on-site renewable solar energy.
Implementation	CON-IMP-5H	Provide incentives such as expedited processing for facilities that use renewable sources for energy production.	***Not applicable***. The City is responsible for implementation of this measure. The Project would not interfere with the City's ability to implement this policy. Nonetheless, the Project includes MM-GHG-9, which requires the Project to provide a portion of its energy use from on-site renewable solar energy.
Goal	CON-6	Green Building programs achieve water and energy efficiency, minimize raw resource consumption, and reduce the amount of waste placed in landfills while improving human health and quality of life in the City.	***Not applicable***. The City is responsible for the development of green building programs. The Project would not interfere with the City's ability to implement this goal. Although not applicable at the project-level, the Project includes MM-GHG-7, MM-GHG-8, MM-GHG-10, and MM-GHG-11, which would serve to meet the goals outlined in the City's policy to conserve energy and water and reduce waste.
Policy	CON-6.1	Promote improvement in the health and productivity of new buildings by training building personnel in new construction	***Not applicable***. The City is responsible for the development of training to promote improvements in the health and productivity of buildings. The Project would not interfere with

Table 4.1-8. Project Potential to Conflict with City of Garden Grove General Plan

General Plan Element/Type	General Plan Number	Description	Potential to Conflict
		practices and the use of alternative or recycled building materials.	the City's ability to implement this policy. Nonetheless, the Project includes PDF-27 that supports the use of sustainable building materials.
Policy	CON-6.2	Provide information, marketing, training, and education to the public to support green building activities.	***Not applicable.*** The City is responsible for the development of marketing, training, and education to support green building activities. The Project would not interfere with the City's ability to implement this policy. Nonetheless, the Project includes PDF-27, MM-GHG-7, MM-GHG-8, MM-GHG-10, and MM-GHG-11, which would serve to support this policy.
Safety Element			
Goal	SAF-10	A robust, climate-responsive community prepared to anticipate, adapt to, and mitigate impacts stemming from climate change.	***Not applicable***. The Project would not interfere with the City's ability to implement this policy. Nonetheless, the Project has incorporated PDFs and mitigation measures focused on the following categories: *Transportation and land use* ▪ The Project is an infill development on previously developed land consistent with its land use designation, located within a TPA near existing transit; ▪ MM-GHG-4 (EV charging), ▪ MM-GHG-5 (Guest Trip Reduction) ▪ MM-TRA-1 (Employee Commute Trip Reduction) ▪ MM-TRA-2 (Bike Facilities) *Energy and buildings* ▪ PDF-27 (Sustainable building materials) ▪ MM-GHG-1 (Construction Office Energy) ▪ MM-GHG-7 (Building Energy Efficiency) ▪ MM-GHG-8 (Cool Roof/Deck)

Table 4.1-8. Project Potential to Conflict with City of Garden Grove General Plan

General Plan Element/Type	General Plan Number	Description	Potential to Conflict
			▪ MM-GHG-9 (Renewable Energy) ▪ MM-GHG-12 (Zero Emission Landscape Equipment) *Water and waste* ▪ PDF-27 (Sustainable Building Materials) ▪ MM-GHG-3 (Construction Waste) ▪ MM-GHG-10 Water Conservation ▪ MM-GHG-11 Waste Reduction ▪ MM-GHG-14 (Refrigerant Management) The above measures represent best practices for anticipating and mitigating climate change impacts.
Policy	SAF-10.6	Encourage development projects to incorporate design features that reduce the impact of extreme heat events.	***Not applicable***. The Project would not interfere with the City's ability to implement this policy. See Response to SAF-10.
Policy	SAF-10.7	Consider the possibility of constrained future water supplies due to long-term climate change impacts on water supplies and require enhanced water conservation for new construction and retrofits.	***No conflict with mitigation***. Without the incorporation of measures to address potentially constrained water supplies in the future, the Project would potentially conflict with this policy. As discussed in the response to Goal SAF-10, the Project would not interfere with the City's ability to implement this policy and would include MM-GHG-10 to conserve water and mitigate the potential of constrained water supplies in the future. With implementation of this measure, the Project would not conflict with this policy.
Policy	SAF-10.10	Encourage mixed-use development throughout the City consistent with the goals and policies of the Land Use Element to promote jobs/housing proximity, transit-	***No conflict***. The Project does not interfere with the City's ability to implement this policy. While the Project is not mixed use, it does include jobs near existing transit within an infill urban area near

Table 4.1-8. Project Potential to Conflict with City of Garden Grove General Plan

General Plan Element/Type	General Plan Number	Description	Potential to Conflict
		oriented development, and high-density development along major corridors.	residential and other commercial uses.
Policy	SAF-10.11	Encourage infill, redevelopment, and higher density development consistent with the goals and policies of the Land Use Element.	*No conflict*. The Project would construct a resort hotel on an infill site near existing transit and surrounded by urban uses.
Implementation	SAF-IMP-10F	Design new buildings to use less cooling through passive heat and cooling techniques.	*No conflict with mitigation*. The Project includes MM-GHG-7 that requires building energy efficiency that would result in less energy use for heating and cooling. Implementation of this measure would eliminate the potential conflict.
Implementation	SAF-IMP-10G	Encourage the use of water-porous pavement materials to allow for groundwater recharge and reductions in stormwater runoff, and materials that reflect solar energy and stay cooler.	*No conflict with mitigation*. The Project does not interfere with the City's implementation of this measure. The Project includes MM-GHG-8, which could include permeable surfaces as well as light-colored materials with solar reflectivity to stay cooler. Implementation of this measure would remove the potential conflict.
Implementation	SAF-IMP-10I	Require the use of sustainable landscaping techniques and water conservation measures in new development beyond current requirements.	*No conflict with mitigation*. See Response to Goal SAF-10. The Project does not interfere with the City's implementation of this measure. The Project includes MM-GHG-10, which would serve to reduce water use beyond regulatory requirements. Implementation of this measure would remove the potential conflict.
Implementation	SAF-IMP-10O	Promote limiting idling time for commercial vehicles including delivery and construction vehicles, consistent with South Coast Air Quality Management District idling regulations.	*No conflict*. The Project includes PDF-12 and PDF-21, which serve to reduce idling by delivery and construction vehicles.

Table 4.1-8. Project Potential to Conflict with City of Garden Grove General Plan

General Plan Element/Type	General Plan Number	Description	Potential to Conflict
Implementation	SAF-IMP-10Q	Encourage the use of available energy-saving measures that exceed the minimum Title 24 requirements for residential and commercial projects.	*No conflict with mitigation*. See Response to Goal SAF-10. The Project does not interfere with the City's implementation of this measure. The Project includes MM-GHG-7, which would require the Project to include building energy efficiencies. Implementation of this measure would remove the potential conflict.
Implementation	SAF-IMP-10AB	Develop a strategy to reduce greenhouse gas emissions citywide consistent with other City policy objectives. Consider developing a climate action plan or similar document.	*Not applicable*. The City is responsible for development of a strategy to reduce GHG emissions citywide. The Project would not interfere with the City's ability to develop a Climate Action Plan. Nonetheless, the Project includes sustainable project design features and mitigation measures that often serve as best practices in new development for achieving GHG reductions.
Circulation Element			
Goal	CIR-4	A reduction in vehicle miles traveled in order to create a more efficient urban form.	*No conflict with mitigation*. The Project would not interfere with the City's ability to implement this goal. The Project would have less than significant VMT impacts under most scenarios, but mitigation is required for one VMT scenario as described in Section 4.2 of the SEIR. However, the Project's proximity to transit and inclusion of MM-TRA-1, MM-TRA-2, and MM-GHG-5 would resolve the potential conflict.
Policy	CIR-4.1	Strive to achieve a balance of land uses whereby residential, commercial, and public land uses are proportionally balanced.	*No conflict*. The Project would not interfere with the City's ability to implement this goal. The Project would develop visitor serving uses on appropriately designated land within a TPA on a previously developed infill site. These Project characteristics

Table 4.1-8. Project Potential to Conflict with City of Garden Grove General Plan

General Plan Element/Type	General Plan Number	Description	Potential to Conflict
			would be supportive of this policy and thus not conflict.
Policy	CIR-4.2	Strive to reduce the number of miles traveled by residents to their places of employment.	***No conflict with mitigation***. The Project would offer new employment opportunities in the City of Garden Grove. Without MM-TRA-1 and MM-TRA-2, the Project would initially potentially conflict with this policy. Implementation of these measures would reduce vehicle trips and associated VMT and resolve the potential conflict.
Goal	CIR-5	Increased awareness and use of alternate forms of transportation generated in, and traveling through, the City of Garden Grove.	***No conflict with mitigation***. The Project is located on a previously developed infill site within a TPA near transit. However, without MM-TRA-1, MM-TRA-2, and MM-GHG-5, the Project would initially potentially conflict with this policy. Implementation of these measures would reduce vehicle trips and associated VMT from employees and guests, thus resolving the potential conflict.
Policy	CIR-5.1	Promote the use of public transit.	***No conflict with mitigation***. See response to Goal CIR-5. The Project is located within a TPA and includes MM-GHG-5 and MM-TRA-1, which would include promoting the use of public transit.
Policy	CIR-5.3	Provide appropriate bicycle access throughout the City of Garden Grove.	***Not applicable***. The City is responsible for ensuring appropriate bicycle access throughout the City of Garden Grove. The Project would not interfere with the City's ability to implement this policy. In addition, the Project includes MM-GHG-5 and MM-TRA-2, which would provide access through the Project site and bicycle parking that would be supportive of this policy.

Table 4.1-8. Project Potential to Conflict with City of Garden Grove General Plan

General Plan Element/Type	General Plan Number	Description	Potential to Conflict
Policy	CIR-5.4	Provide appropriate pedestrian access throughout the City of Garden Grove.	***Not applicable.*** The City is responsible for providing appropriate pedestrian access throughout the City of Garden Grove. The Project would not interfere with the City's ability to implement this policy. Nonetheless, the Project design and MM-GHG-5 would provide safe pedestrian access throughout the Project site and to connecting public pedestrian networks.
Policy	CIR-5.5	Continue to implement the provisions of the Transportation Demand Ordinance.	***Not applicable***. The City is responsible for implementation of its Transportation Demand Ordinance. The Project does not interfere with the City's ability to implement this policy. Nonetheless, the Project includes MM-TRA-1 and MM-TRA-2, which would reduce employee commute trips by encouraging shared rides and use of alternative transportation. Implementation of these measures would be supportive of this policy.
Implementation	CIR-IMP-5A	Promote the use of Transportation Demand Management (TDM) Measures.	***Not applicable***. The City is responsible for promotion of TDM measures. The Project does not interfere with the City's ability to implement this policy. Nonetheless, the Project includes MM-TRA-1 and MM-TRA-2, which promote ride-sharing and alternative transportation to reduce employee commute trips, supporting this implementation measure.
Implementation	CIR-IMP-5B	Encourage the creation of programs such as Transportation Systems Management (TSM), public transit, carpools/vanpools, ride-match, bicycling, and other alternatives to the	***Not applicable***. The City is responsible for the creation of TSM programs. The Project does not interfere with the City's ability to implement this policy. Nonetheless, the Project includes MM-TRA-1 and MM-TRA-2, which

Table 4.1-8. Project Potential to Conflict with City of Garden Grove General Plan

General Plan Element/Type	General Plan Number	Description	Potential to Conflict
		energy-inefficient use of vehicles.	promote ride-sharing and alternative transportation to reduce employee commute trips, supporting this implementation measure.
Goal	CIR-6	A safe, appealing, and comprehensive bicycle network provides additional recreational opportunities for Garden Grove residents and employees.	***Not applicable***. The City is responsible for the development of a comprehensive bicycle network. The Project does not interfere with the City's ability to implement this policy. In addition, the Project includes MM-GHG-5 that would provide safe bicycle access through the Project site, thus supporting this goal.
Policy	CIR-6.3	Encourage existing and new major traffic generators to incorporate facilities such as bicycle racks and showers into the development.	***No conflict with mitigation***. The Project does not interfere with the City's ability to implement this policy. Without MM-TRA-2 and MM-GHG-5, the Project would initially potentially conflict with the City's policy encouraging bicycle racks and showers for new traffic generators. However, these measures include bicycle parking for employees and guests, and the Project design incorporates employee showers, resolving the potential conflict.
Implementation	CIR-IMP-6H	Encourage the placement of signage that educates and informs automobiles and bicyclists that use the facility.	***Not applicable*** The City is responsible for this implementation measure. The Project does not interfere with the City's ability to implement this measure. Additionally, the Project includes MM-GHG-5 that would be supportive of this implementation measure.
Goal	CIR-10	Participation in regional transportation planning efforts to address interjurisdictional issues and maintain competitive advantage in capital improvement funding programs.	***Not applicable***. The City is responsible for its participation in regional transportation planning. The Project does not interfere with the City's ability to implement this goal.

Table 4.1-8. Project Potential to Conflict with City of Garden Grove General Plan

General Plan Element/Type	General Plan Number	Description	Potential to Conflict
Policy	CIR-10.3	Encourage employers to reduce employee-related travel.	***No conflict with mitigation***. The Project does not interfere with the City's ability to implement this policy. Without MM-TRA-1 and MM-TRA-2, the Project would initially potentially conflict with this policy. However, these measures would reduce employee commute trips by encouraging shared rides and use of alternative transportation, resolving the potential conflict.
Goal	CIR-11	Continued compliance with regional congestion management, transportation demand, traffic improvement, air quality management, and growth management programs.	***No conflict***. The City is responsible for its compliance with regional congestion management, transportation demand, traffic improvement, air quality management, and growth management programs. The Project would not interfere with the City's ability to implement this goal. Nonetheless, the Project is consistent with the City's General Plan development and therefore, the City's planned growth. Additionally, the Project includes MM-TRA-1, MM-TRA-2, and MM-GHG-5 that seek to reduce vehicle trips from employees and guests and promote alternative transportation.
Policy	CIR-11.5	Encourage employers to reduce employee-related travel.	***No conflict with mitigation***. The Project does not interfere with the City's ability to implement this policy. Without MM-TRA-1 and MM-TRA-2, the Project would potentially initially conflict with this policy. However, these measure would reduce employee commute trips by encouraging shared rides and use of alternative transportation, thus resolving the potential conflict.
Implementation	CIR-IMP-11D	Encourage employers to use vans, small buses, and other HOVs to link workplaces with park-	***Not applicable***. The Project does not interfere with the City's ability to implement this measure. Nonetheless, the Project is located near existing transit and

Table 4.1-8. Project Potential to Conflict with City of Garden Grove General Plan

General Plan Element/Type	General Plan Number	Description	Potential to Conflict
		and-ride facilities and transit centers.	includes MM-TRA-1 and MM-TRA-2 to reduce employee commute trips and encourage alternative transportation.
Implementation	CIR-IMP-11E	Encourage the provision of convenient eating and recreational facilities on-site for businesses employing more than 100 people.	***No conflict***. The Project does not interfere with the City's ability to implement this measure. The Project also includes eating and recreational facilities that could serve employees.
Implementation	CIR-IMP-11F	Encourage businesses to establish incentives and regulations to spread work trips over a longer period to reduce peak period congestion.	***No conflict***. The Project does not interfere with the City's ability to implement this measure. As a resort hotel that requires 24-hour employment, workers will arrive at the Project at different times throughout the day and evening.

Source: City of Garden Grove General Plan 2030, 2008.
Notes: TPA = transit priority area; MM = mitigation measure; GHG = greenhouse gas; VOC = volatile organic compound; VMT = vehicle miles traveled.

As shown above, the Project would potentially conflict with some of the applicable General Plan goals and policies adopted for the purpose of reducing the emissions of GHGs prior to mitigation. This is a potentially significant impact. The Project would implement mitigation measures that are considered best practices for the reduction of GHG emissions. Implementation of these measures would resolve any potential conflicts. Based on the preceding the Project would not conflict with the General Plan goals and policies adopted for the purpose of reducing GHG emissions. The impact would be less than significant with mitigation.

Level of Significance Before Mitigation

As shown in Table 4.1-6 through Table 4.1-8, the Project would potentially conflict with applicable plans policies, or regulations adopted for the purpose of reducing the emissions of GHGs; this is a **potentially significant impact**.

4.1.8 Mitigation Measures

Mitigation measures (MM) under CEQA are selected based on their ability to substantially lessen or avoid significant environmental impacts while considering feasibility. In CEQA, "feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors. The goal is to balance effective environmental protection with realistic implementation.

Construction (On-Site) Mitigation Measures

As noted previously, GHG mitigation measures for construction emissions are limited; however, available feasible construction GHG emissions mitigation measures are imposed as noted below. The following mitigation measures that were identified as quantifiable would reduce the Project's GHG emissions in a quantifiable way. Those

reductions are included in the quantitative analysis. Otherwise, for the non-quantifiable mitigation measures that are imposed, GHG reductions have not been identified in this analysis.

MM-GHG-1. Electric Construction Equipment. Prior to issuance of building permits, the Project applicant or designee shall submit documentation to the City of Garden that temporary power will be established to the Project site during vertical construction. All generator(s) and crane(s) shall be electric-powered. In addition, the Project shall limit air compressors used during the architectural coating/painting phase to equipment that is electric-powered.

MM-GHG-1 is quantified in the construction analysis.

MM-GHG-2. Construction Office Energy Efficiency. Prior to issuance of building permits, the Applicant or designee shall submit documentation to the City of Garden Grove that temporary construction field office(s) are equipped with energy efficient lighting such as compact fluorescent or LEDs and that heating and cooling units are Energy Star certified.

MM-GHG-2 is not quantified in the construction analysis.

MM-GHG-3. Construction Debris Recycling. Prior to the start of construction, the Project's contractor shall develop a Construction Waste Management Plan for submittal and approval to the City of Garden Grove. The Construction Waste Management Plan shall recycle or salvage non-hazardous construction debris such that a minimum target of 75% is achieved. This will exceed the City's current target of 65% diversion.

MM-GHG-3 is not quantified in the construction analysis.

Operational (On-site) Mitigation Measures

MM-GHG-4. Electric Vehicle Charging Infrastructure. Prior to issuance of building permits, the Project applicant or designee shall submit a site plan to the City of Garden Grove for approval noting the location of electric vehicle infrastructure and charging stations. Prior to issuance of the final certificate of occupancy, the Project applicant or designee shall provide electric vehicle (EV) charging infrastructure within the Project site as required by the applicable California Green Building Standards Code, but that, at a minimum, meets or exceeds 2022 California Green Building Standards Code, Tier 2 standards. Tier 2 requires approximately 225 parking spaces to be EV capable, and 75 spaces to be equipped with EV Supply Equipment (EVSE). The Project shall install a minimum of 225 EV capable spaces and 100 EVSE spaces.

MM-GHG-4 is not quantified in the operational analysis.

MM-GHG-5. Guest Vehicle Trip Reductions. Prior to issuance of building permits, the Project applicant shall submit a site plan to the City of Garden Grove for approval identifying where pedestrian and bicycle connections to adjacent facilities will be provided and where bicycle parking spaces will be provided. The City shall verify the inclusion of pedestrian and bicycle infrastructure prior to the issuance of the final certificate of occupancy. The Project applicant or designee shall ensure that, at a minimum, the following trip reduction measures are implemented during Project

operations to reduce the number of auto-based trips generated by the Project and to encourage the use of transit, bicycling, and walking.

- Improve the walkability and design of the Project by providing pedestrian and bicycling connections within the Project site and to adjacent off-site facilities (i.e., sidewalks, crosswalks, wayfinding signage, etc.).
- Provide secure on-site bicycle racks to accommodate a minimum of 38 bicycle parking spaces and provide bicycle rentals for hotel guests.
- Alternative transportation services such bike rentals and transit information shall be seamlessly integrated into the guest experience, making alternative modes of travel easy to understand, access, and use.
- Hotel management/concierge should provide information that promotes walking, bicycling and public transit options to nearby attractions. This should include information on local bus routes and schedules and wayfinding to the existing transit stops along Harbor Boulevard.
- Qualitative assessments (e.g., user satisfaction surveys, walk audits, guest feedback) shall be regularly conducted to evaluate the effectiveness of trip reduction strategies.
- An annual report summarizing how transportation options are being used, guest perceptions, and planned improvements shall be submitted to the City.

MM-GHG-5 is not quantified in the operational analysis.

MM-GHG-6. Limit Large Diesel Trucks During Operation. Prior to issuance of certificate of occupancy, the Project applicant or designee shall submit a Truck Delivery Management Plan to the City of Garden Grove that documents how truck deliveries will be restricted and monitored. The Project applicant or designee shall implement a monitoring program to restrict the number of large diesel trucks coming to the site (i.e., for deliveries, trash collection, or other services) to an average of 10 trucks per day or less. This restriction is specifically applicable to trucks classified as medium-heavy duty and heavy-heavy duty with gross vehicle weight (GVW) greater than 19,500 pounds. Annual reports summarizing heavy-duty truck trips shall be provided to the City of Garden Grove.

MM-GHG-6 is quantified in the operational analysis.

MM-GHG-7. Building Energy Efficiency Measures. Prior to issuance of building permits, the Project applicant or designee shall submit documentation of building energy efficiency measures to the City of Garden Grove. Energy efficiency measures shall include, at a minimum, the following:

1. LED Lighting - High-lumen LED light fixtures shall be used exclusively for the lighting of spaces throughout the Project that require 8 to 10 watts per fixture
2. Energy efficient lighting shall be incorporated into all on-site lighting.
3. HVAC Optimization - The HVAC system shall include the following:
    a. Heat pumps will be used to heat spaces and water using a heat exchanger and will be monitored by the Project Building Management System (BMS).
    b. Smart thermostats, which include a motion sensor detector and door/window open sensors, will be installed in each guest room.
    c. The central plant will utilize a Combination Plant with SmartPlate EV

4. Glazing - All glazing for the tower and exterior public spaces shall be installed with Low-E glass [U-factor (thermal transmittance) ≤ 0.28 and Solar Heat Gain Coefficient (SHGC) ≤ 0.23.
5. Energy Management System - The Project shall use advanced systems to monitor and optimize energy use in real time.
6. Benchmarking and Monitoring- The Project shall incorporate an Energy Star Portfolio Management system to track and manage energy consumption
7. Third-Party Verification/LEED Certification - The Project shall obtain third-party HVAC commissioning verification or LEED certification to verify energy savings

MM-GHG-7 is quantified in the operational analysis.

MM-GHG-8. Cool Roof/Deck. Prior to issuance of building permits, the Project applicant or designee shall submit plans to the City for approval that require cool roof and cool deck surfaces to be included as part of the Project for the podium and tower consistent with the specifications provide below.

- Cool Roof Installation:

  All roofing materials shall meet or exceed the California Title 24, Part 6 requirements for cool roofs, based on roof slope:

- Low-sloped roofs (⩽ 2:12 pitch):
  - Aged Solar Reflectance (SR) ⩾ 0.63
  - Thermal Emittance (TE) ⩾ 0.75
  - Or Solar Reflectance Index (SRI) ⩾ 75
- Steep-sloped roofs (> 2:12 pitch):
  - Aged SR ⩾ 0.20
  - TE ⩾ 0.75
  - Or SRI ⩾ 16
- Cool Deck Surfaces:

  All exterior hardscape surfaces exposed to sunlight (e.g., pool decks, patios, walkways) shall use high-albedo materials or cool surface coatings with:
  - Minimum SR of 0.29 or higher
  - Or materials with a demonstrated surface temperature reduction of at least 10°F compared to conventional concrete or asphalt

To meet the above standards, the project applicant may implement one or more of the following:

- Use Energy Star®-rated roofing products or materials listed in the Cool Roof Rating Council (CRRC) directory.
- Apply reflective coatings or single-ply membranes with compliant SR and TE values.
- Install light-colored or permeable pavers, cool concrete, or coated surfaces for decks and walkways, such as permeable interlocking concrete pavers, porous asphalt, permeable concrete, geocell systems, or bio-asphalt.
- Incorporate green roofs or vegetated shading structures as alternative compliance pathways (subject to City approval).

Monitoring and Reporting shall include:

- Submittal of roofing and hardscaping material specifications to the City of Garden Grove Building Division prior to issuance of building permits.
- City inspectors shall verify installation during final inspection and prior to issuance of the final certificate of occupancy.

MM-GHG-8 is not quantified in the operational analysis.

MM-GHG-9. Renewable Energy. The Project Applicant or designee shall install a solar photovoltaic system capable of generating a minimum of 267,000 kilowatt hours (kWh) per year prior to issuance of certificate of occupancy.

MM-GHG-9 is quantified in the operational analysis.

MM-GHG-10. Water Conservation. Prior to receiving the final certificate of occupancy, the Project applicant or designee shall submit a Water Conservation Compliance Report to the City of Garden Grove for review and approval. The Project shall achieve a minimum 10% reduction in total water use compared to the baseline of 167 gallons per room per day as identified in the Water Supply Assessment (Psomas 2022). This equates to a target of no more than 150.3 GPCD at full occupancy. The Water Conservation Compliance Report shall include product specifications for all water-saving fixtures and systems, landscape and irrigation plans, greywater system design and capacity documentation, post-occupancy water use monitoring plan for the first 12 months after occupancy. To meet or exceed the performance standard, the Project may implement a combination of the following water conservation strategies:

- Low-Flow Water Fixtures for guest rooms and public areas.
- Smart Irrigation System - outdoor landscaping shall include weather-based irrigation controllers and drought-resistant landscaping to minimize outdoor water use.
- Greywater Recycling.

MM-GHG-10 is quantified in the operational analysis.

MM-GHG-11. Waste Reduction. Prior to issuance of the final certificate of occupancy, the Project applicant or designee shall submit a Waste Management, Recycling, and Composting Plan to the City of Garden Grove for review and approval**.** The program shall be implemented on-site at the Project location and apply to all operational areas, including guest services, food and beverage operations, maintenance, and administrative functions. The waste reduction program shall be fully implemented during Project operations. The Plan shall specify a minimum diversion of 25% of municipal solid waste generated on-site from landfill disposal. The Waste Management, Recycling, and Composting Plan may include but not be limited to the following:

- Recycling Program
  - - Labeled bins for recyclables and certified hauler contracts.
- Organics and Composting Program
  - Collection of food scraps and compostables.
- Source Reduction Measures
  - Reduce single-use items and paper use

- Employee and Guest Education
  - Staff training and signage for guests
- Monitoring and Reporting
  - Track waste and submit Annual Waste Diversion Report to the City of Garden Grove

MM-GHG-11 is quantified in the operational analysis.

MM-GHG-12. Zero Emission Landscape Equipment. During Project operations, the Project Applicant or designee shall ensure zero-emission landscape equipment (defined as equipment that does not emit tailpipe emissions during operation) is utilized. The Project applicant or designee shall be responsible for ensuring that all landscape maintenance contractors and staff comply with this measure. All landscape maintenance activities associated with the Project shall utilize zero-emission landscaping equipment, such as electric-powered or battery-operated tools. This requirement applies to all landscaped areas within the Project site, including but not limited to courtyards, green spaces, perimeter landscaping, and rooftop gardens. The requirement shall be implemented prior to the commencement of landscape maintenance operations. To meet or exceed the performance standard, the Project may implement a combination of the following strategies:

Electric-Powered Equipment

- Use of electric or battery-powered:
  - Leaf blowers
  - Lawn mowers
  - Hedge trimmers
  - Edgers
  - Chainsaws

Contractor Requirements

- Include zero-emission equipment requirements in all landscape maintenance contracts.
- Require contractors to provide documentation of equipment type and compliance.

On-Site Charging Infrastructure

- Install dedicated charging stations or outlets for landscape equipment.

Equipment Inventory and Tracking

- Maintain an inventory of all landscape equipment used on-site.
- Submit an annual compliance report to the City of Garden Grove verifying that only zero-emission equipment is in use.

Training and Education

- Provide training to landscape maintenance staff on the proper use and maintenance of electric equipment.
- Display signage or include information in sustainability reports to promote awareness.

MM-GHG-12 is quantified in the operational analysis.

MM-GHG-13. Prohibit Woodburning devices, Natural Gas Fireplaces and Fire Pits. Prior to the issuance of building permits, the Project applicant or designee shall submit building design plans for approval

of the City showing the prohibition of on-site woodburning devices, natural gas fireplaces, fire pits, or other decorative combustion features throughout the Project site. Prior to the issuance of the final certificate of occupancy, the City shall confirm that this prohibition has been implemented.

MM GHG-13 is not quantified in the operational analysis.

MM-GHG-14. Refrigerant Management Program. Prior to issuance of mechanical permits, the Project Applicant or designee shall develop and submit a Refrigerant Management Program to the City of Garden for review and approval. The Project applicant or designee shall be responsible for developing, implementing, and maintaining the refrigerant management program in coordination with HVAC contractors and facility operations staff. The Refrigerant Management Program shall include the use of low-GWP refrigerants (e.g., R-32 or better) and incorporate best management practices to reduce emissions from service, operation, and disposal of refrigerants. This measure shall apply to all refrigeration and HVAC systems installed and operated within the Project site, including guest rooms, common areas, kitchens, and mechanical rooms. The Project shall ensure that:

- 100% of installed HVAC and refrigeration systems use refrigerants with a GWP $\leqslant$ 750, consistent with California Air Resources Board (CARB) regulations.
- The refrigerant management program shall achieve a minimum 10% reduction in potential refrigerant emissions compared to standard industry practices, as demonstrated through leak rate tracking and maintenance logs.

To meet or exceed the performance standard, the Project may implement a combination of the following strategies:

<u>Mechanical Equipment</u>

- Install microchannel heat exchangers in A/C equipment in place of conventional heat exchangers.

<u>Use of Low-GWP Refrigerants</u>

- Select refrigerants such as R-32, R-454B, or other CARB-compliant alternatives with GWP $\leqslant$ 750.
- Avoid high-GWP refrigerants such as R-410A and R-404A.

<u>Leak Detection and Prevention</u>

- Install automatic leak detection systems for large-capacity systems.
- Conduct quarterly inspections and maintain leak logs.

<u>Refrigerant Recovery and Disposal</u>

- Use certified technicians for refrigerant recovery and disposal.
- Maintain documentation of recovered and recycled refrigerants.

<u>Preventive Maintenance Program</u>

- Implement a scheduled maintenance plan to inspect and service HVAC and refrigeration systems.
- Include refrigerant charge optimization and system performance checks.

<u>Training and Certification</u>

- Ensure all HVAC technicians are EPA Section 608 certified.
- Provide training on low-GWP refrigerant handling and leak prevention.

Third-Party Verification

- Obtain third-party verification of refrigerant management practices through programs such as GreenChill or LEED Enhanced Refrigerant Management credit.

Prior to issuance of certificate of occupancy, the City of Garden Grove will verify that the equipment specified in the Refrigerant Management Program has been installed. Ongoing compliance shall be performed by the Project applicant or their designee.

MM GHG-14 is quantified in the operational analysis.

MM-GHG-1 through MM-GHG-14 will be imposed on the Project in accordance with CEQA to reduce construction and operational GHG emissions. Table 4.1-9 shows the Project's mitigated construction GHG emissions and Table 4.1-10 shows the Project's mitigated operational emissions.

Table 4.1-9. Estimated Annual Construction Greenhouse Gas Emissions - Mitigated

Year	CO_2	CH_4	N_2O	R	CO_2e
	Metric Tons per Year				
2025	388.92	0.02	0.04	0.34	402.52
2026	1,398.25	0.05	0.11	1.65	1,434.02
2027	1,376.54	0.04	0.11	1.48	1,410.81
2028	113.11	<0.01	0.01	0.10	114.95
				Total	**3,362.30**
				Amortized 30-Year Construction Emissions	*112.08*

Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; R = refrigerant; CO_2e = carbon dioxide equivalent; <0.01 = reported value less than 0.01. The values shown are the annual emissions reflect CalEEMod "unmitigated" output.
Totals may not sum due to rounding.
See Appendix C for complete results.

Table 4.1-10. Estimated Annual Operational Greenhouse Gas Emissions –2028 - Mitigated

Emission Source	CO_2	CH_4	N_2O	R	CO_2e
	Metric Tons per Year				
Mobile	2,447.19	0.13	0.09	3.08	2,479.52
Area	0	0	0	NA	0
Energy	4,714.60	0.42	0.02	NA	4,730.66
Water	35.48	0.84	0.02	NA	62.54
Waste	28.11	2.81	<0.01	NA	98.34
Refrigerant	NA	NA	NA	11.34	11.34
Stationary	25.53	<0.01	<0.01	0.00	25.61
Total	**7,250.91**	**4.20**	**0.13**	**14.42**	**7,408.02**
				Amortized 30-Year Construction Emissions	*112.08*
				Project Operation + Amortized Construction Total	**7,520.09**
				GHG Threshold	**1,400**
				Exceed Threshold?	**Yes**

Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; R= refrigerant; CO_2e = carbon dioxide equivalent; <0.01 = reported value less than 0.01; NA = not applicable.
Columns may not sum due to rounding.
See Appendix C for complete results.

As shown in Table 4.1-10, the mitigated GHG emissions with the imposition of MM-GHG-1 through MM-GHG-14 exceed the 1,400 MT CO_2e per year threshold. The Project's GHG emissions would be a potentially significant GHG impact after implementation of mitigation.

As mitigation measures MM-GHG-1 through MM-GHG-14 do not reduce the Project's GHG emissions below the applicable threshold, carbon offsets are evaluated below, consistent with Tier 5 of the SCAQMD guidance and other CEQA guidance which includes implementation of CEQA mitigation including the purchase of GHG offsets.

Carbon Offsets

Following implementation of all feasible construction and operational (on-site) MMs, the purchase and retirement of carbon offsets through the voluntary market to reduce operational GHG emissions plus amortized construction emissions below the 1,400 MT CO_2e threshold for the life of the Project (30 years) was evaluated.

The use of carbon offsets as a CEQA mitigation strategy for the reduction of GHG emissions was memorialized with the Senate Bill 97-directed amendments to the CEQA Guidelines, as adopted by Office of Planning and Research (now Office of Land Use and Climate Innovation) and the California Natural Resources Agency circa 2009. The use of offsite actions and credits, such as carbon offsets, to mitigate GHG impacts are based on the following:

- CEQA Section 15126.4 (c)(3) states that mitigation measures for GHG emissions may include "offsite measures, including offsets that are not otherwise required, to mitigate a project's emissions"
- CEQA Section 151370 (e) states that mitigation includes "Compensating for the impact by replacing or providing substitute resources or environments"
- CEQA Section 21168.6.5 (i)(1) states that "Offset credits shall be employed by the applicant only after feasible local emission reduction measures have been implemented."
- The California Natural Resources Agency's Final Statement Of Reasons For Regulatory Action for the CEQA Guidelines Amendments (2009) also supports the use of GHG credits: "Proposed subdivision (c)(3) recognizes the availability of various offsite mitigation measures. Such measures could include, among others, the purchase of carbon offsets, community energy conservation projects, and off-site forestry projects"

For these purposes, the City will require offsets purchased from the following CARB-accredited registries: Climate Action Reserve, the American Carbon Registry, or Verra (formerly, the Verified Carbon Standard); as well as credits issued for projects listed on the California Carbon Sequestration and Climate Resiliency Project Registry, which is maintained by the California Natural Resources Agency to be adequate to meet the offset requirements described herein.

Verra's Verified Carbon Units (VCUs) are issued only after projects undergo a rigorous validation and verification process. Each VCU represents one ton of CO_2-equivalent emissions reduced or removed and must meet quality assurance principles ensuring that reductions are *real, measurable, additional, permanent, independently verified, conservatively estimated, uniquely numbered, and transparently listed*.

Climate Action Reserve (CAR) protocols are developed through a transparent, multi-stakeholder process. Projects must be independently verified and adhere to standards that ensure emissions reductions are *real, permanent,*

and additional. CAR also assigns unique serial numbers to carbon credits to prevent double counting and ensure they are verifiable and enforceable.

American Carbon Registry (ACR) is widely recognized for its rigorous standards. ACR's protocols similarly require that carbon offset projects demonstrate *additionality*, undergo third-party verification, and ensure that reductions are *real, quantifiable, permanent, and verifiable*. ACR's standards are aligned with international best practices and are often referenced alongside Verra and CAR in regulatory and voluntary markets.

As discussed before, for purposes of assessing the Project's overall GHG emissions, construction emissions are typically amortized and added to the operational emissions. To provide flexibility for acquisition of carbon credits in bulk or in increments consistent with CEQA standards for contemporaneous mitigation of impacts, construction and operational emission offsets have been separately identified so that the purchase of construction offsets can occur prior to the start of construction while the purchase of operational offsets could occur prior to first occupancy in bulk or in increments. MM-GHG-15 requires the Project applicant to purchase carbon offsets to mitigate all construction GHG emissions and requires the Project to reduce the operational emissions below the 1,400 MT CO_2e per year threshold for a period of 30 years as a lump sum or purchase carbon offsets on an annual basis.

MM-GHG-15. Carbon Offsets – The Project Applicant (or its designee) shall implement the following carbon offsets in accordance with the Project's construction and operational phases as outlined below.

Timeline for Acquisition of Carbon Offset Credits

Construction

Prior to issuance of grading permits, the Project Applicant (or its designee) shall purchase and retire carbon offsets in a quantity sufficient to offset all construction GHG emissions in a lump sum with the quantification, performance standards, and requirements set forth below. Alternatively, construction offsets may be purchased on an annual basis by purchasing the first phase of construction offsets prior to start of grading and then purchasing offsets for each following year by December 31 of the year preceding the new year in which construction will occur. Annual construction GHG emission offsets shall also be subject to the same quantification, performance standards, and requirements set forth below.

Operation

Prior to issuance of the final certificate of occupancy, the Project Applicant or its designee shall purchase and retire carbon offsets in a quantity sufficient to offset, for a 30-year period following occupancy of the Project, the construction and operational GHG emissions from Project to the 1,400 MT CO_2e per year threshold, consistent with the quantification, performance standards and requirements set forth below. Alternatively, the Project Applicant or its designee may purchase and retire annual operational GHG offsets for a period of 30 years by December 31 of the year preceding each new year after the issuance of the final certificate of occupancy. Annual operational GHG emission offsets shall also be subject to the same quantification, performance standards, and requirements set forth below.

Quantification of GHG Emissions and Reductions Required

Construction

The estimated total construction GHG emissions to be offset are 3,362.30 MT CO_2e if purchased in a lump sum. If purchased on an annual basis, the following schedule provides the estimated annual emissions and date of compliance.

Year	Offsets Required MT CO_2e	Purchase and Retirement Deadline
1	402.52	Prior to issuance of grading permits
2	1,434.02	December 31st of Year 1
3	1,410.81	December 31st of Year 2
4	114.95	December 31st of Year 3
Total	**3,362.30**	

Operation

The estimated operational emissions are 7,408.02 MT CO_2e. To mitigate operational emissions below the 1,400 MT CO_2e per year threshold, the Project would purchase and retire one lump sum of 180,270.60 MT CO_2e of offsets [7,408.02 MT CO_2e – 6,009.02 (offsets) = 1,399 MT CO_2e remaining; 6,009.02 MT CO_2e x 30-year life = 180,270.60 MT CO_2e; or that same total amount of credits in increments over the 30 years. The following schedule provides the estimated offset emissions and dates of compliance under the scenarios where credits are purchased and retired in a lump sum or on an annual basis.

Scenario	Offsets Required MT CO_2e	Purchase and Retirement Deadline
Lump Sum	180,270.60	Prior to issuance of certificate of occupancy
Annual Basis 30-year term	6,009.02	Prior to issuance of certificate of occupancy for Year 1 and December 31st of preceding year.

If the Project Applicant or its designee selects the scenario where the credits are purchased on something other than in one lump sum initially, they can purchase and retire the remaining offsets required in a lump sum in accordance with the remaining term and conditions outlined herein.

Carbon Offset Standards – Eligible Registries, Acceptable Protocols, Defined Terms, and Geographic Priorities

"Carbon offset" shall mean an instrument, credit or other certification verifying the reduction of GHG emissions issued by the following CARB-accredited registries: Climate Action Reserve, the American Carbon Registry, or Verra (formerly, the Verified Carbon Standard); as well as credits issued for projects listed on the California Carbon Sequestration and Climate Resiliency Project Registry, which is maintained by the California Natural Resources Agency and may provide additional offsets. This shall include, but is not limited to, an instrument, credit or other certification issued by these registries for GHG reduction activities. The Project shall neither purchase offsets

from the Clean Development Mechanism registry nor purchase offsets generated under Clean Development Mechanism protocols.

To be eligible under this mitigation measure, carbon offsets must satisfy the "Reporting and Enforcement Standards" below and demonstrate that each registry shall continue its existing practice of requiring the following for the development and approval of protocols or methodologies:

1. Adherence to established GHG accounting principles set forth in the International Organization for Standardization (ISO) 14064, Part 2 or the World Resources Institute/World Business Council for Sustainable Development (WRI/WBCSD) Greenhouse Gas Protocol for Project Accounting; and
2. Oversight of the implementation of protocols and methodologies that define the eligibility of carbon offset projects and set forth standards for the estimation, monitoring and verification of GHG reductions achieved from such projects. The protocols and methodologies shall:
    a. Be developed by the registries through a transparent public and expert stakeholder review process that affords an opportunity for comment and is informed by science;
    b. Incorporate standardized offset crediting parameters that define whether and how much emissions reduction credit a carbon offset project should receive, having identified conservative project baselines and the length of the crediting period and considered potential leakage and quantification uncertainties;
    c. Establish data collection and monitoring procedures, mechanisms to ensure permanency in reductions, and additionality and geographic boundary provisions; and,
    d. Adhere to the principles set forth in the program manuals of each of the aforementioned registries, as such manuals are updated from time to time. The current registry documentation, includes the Climate Action Reserve's *Reserve Offset Program Manual*[5] (April 2024) and *Climate Forward Program Manual*[6] (December 2021); the American Carbon Registry's *The ACR Standard, Requirements and Specifications for the Quantification, Monitoring, Reporting, Verification, and Registration of Project-Based GHG Emissions Reductions and Removals*[7] (July 2023); and, Verra's VCS Standard, *Program Guide*[8] (August 2023) and *Methodology Requirements*[9] (October 2023).

The City has reviewed the registries' methodologies and has determined that protocols established pursuant to such methodologies – including updates to those protocols and methodologies as may occur from time to time by the registries in accordance with the registry documentation listed in the prior paragraph to ensure the continuing efficacy of the reduction activities – are eligible for use under this mitigation measure.

The carbon offsets purchased to satisfy this measure must represent the reduction or sequestration of one MT CO_2e that is "not otherwise required" (CEQA Guidelines Section 15126.4(c)(3)). The carbon offsets must achieve the standard of additional, real, permanent, quantifiable, verifiable, and enforceable reductions, which are defined for purposes of this

5 https://climateactionreserve.org/wp-content/uploads/2024/04/Reserve-Program-Manual-v9.2.pdf
6 https://climateforward.org/wp-content/uploads/2021/12/Climate-Forward-Program-Manual-December-2021_12-FINAL.pdf
7 https://acrcarbon.org/wp-content/uploads/2023/10/ACR-Standard-v8.0.pdf
8 https://verra.org/documents/vcs-program-guide-v4-4/
9 https://verra.org/documents/vcs-methodology-requirements-v4-4/

mitigation measure as follows consistent with the applicable provisions in the California Code of Regulations, Title 17:

1. "Additional" means that the carbon offset is not otherwise required by law or regulation, and not any other GHG emissions reduction that otherwise would occur.
2. "Real" means that the GHG reduction underlying the carbon offset results from a demonstrable action or set of actions, and is quantified under the protocol or methodology using appropriate, accurate, and conservative methodologies that account for all GHG emissions sources and sinks within the boundary of the applicable carbon offset project, uncertainty, and the potential for activity-shifting leakage and market-shifting leakage.
3. "Verifiable" means that the GHG reduction underlying the carbon offset is well documented, transparent and set forth in a document prepared by an independent verification body that is accredited through the American National Standards Institute (ANSI).
4. "Permanent" means that the GHG reduction underlying the carbon offset is not reversible; or, when GHG reduction may be reversible, that a mechanism is in place to replace any reversed GHG emission reduction.
5. "Quantifiable" means the ability to accurately measure and calculate the GHG reduction relative to a project baseline in a reliable and replicable manner for all GHG emission sources and sinks included within the boundary of the carbon offset project, while accounting for uncertainty and leakage.
6. "Enforceable" means that the implementation of the GHG reduction activity must represent the legally binding commitment of the offset project developer to undertake and carry it out.

The City has reviewed and determined that methodologies and protocols established by American Climate Registry, Climate Action Reserve, and Verra establish and require carbon offset projects to comply with standards designed to achieve additional, real, permanent, quantifiable, verifiable and enforceable reductions. Additionally, the "Reporting and Enforcement Standards" below shall ensure that the requirements of this mitigation measure will be enforced, as the City has authority to hold the applicant accountable and to take appropriate corrective action if it determines that any carbon offsets do not comply with the requirements herein.

Carbon offsets secured from the CARB-accredited registries shall be prioritized in accordance with the following criteria: (1) offsets within the City; (2) offsets within the County, only if in-City offsets are unavailable; (3) offsets within the State of California, only if in-county offsets are unavailable; (3) offsets within the United States, only if in-state offsets are unavailable.[10]

The above definitions are provided as criteria and performance standards associated with the use of carbon offsets. Such criteria and performance standards are intended only to further construe the standards under CEQA for mitigation related to GHG emissions (see, e.g., State CEQA Guidelines

[10] For purposes of this provision, offset credits will be deemed "unavailable" if they are either unobtainable generally from the CARB-accredited registries, or if on a per-unit basis if such a credit is otherwise available: (a) for offset credits within the City of Garden Grove, more than 2 times as costly as offset credits within the County of Orange, but not within the City of Garden Grove; (b) for offset credits within the County of Orange, more than 5 times as costly as offset credits within California, but not within the County of Orange; (c) for offset credits within the United State, sufficient offset credits within California are not available for purchase at any cost.

Section 15126.4(a), (c)), and are not intended to apply or incorporate the requirements of any other statutory or regulatory scheme not applicable to the Project (e.g., the Cap-and-Trade Program).

Monitoring, Reporting and Enforcement Standards

Prior to the timeline identified in the initial section of this mitigation measure, the Project Applicant or its designee shall submit documentation in the form of a report to the City that identifies the quantity of emission reductions required by this mitigation measure, as well as the carbon offset proposed for acquisition to achieve compliance with this measure. For purposes of demonstrating that each offset is additional, real, permanent, quantifiable, verifiable and enforceable, the reports shall include: (i) the applicable protocol(s) and methodologies associated with the carbon offsets, (ii) the third-party verification report(s) and statement(s) affiliated with the carbon offset projects, (iii) the unique serial numbers assigned by the registry(ies) to the carbon offset, which serves as evidence that the registry has determined the carbon offset project to have been implemented in accordance with the applicable protocol or methodology and ensures that the offsets cannot be further used in any manner, and (iv) the carbon offset meets the locational attributes as specified by this mitigation measure and verified through a market survey report prepared by a carbon offset broker that identifies the carbon registry listings reviewed for carbon offset availability, including the related date of inquiry.

The Project Applicant (or its designee) shall select and retain at least one independent, third-party expert on GHG mitigation and offsets to review the documentation provided by the Applicant (or its designee) relating to, among other data, construction- and operation-related emissions, and provide a report with analysis and recommendations to the City (with supporting materials), on whether the Project has complied with the off-site GHG emissions reduction measures set forth in this mitigation measure. The Project Applicant's (or its designee's) selection of each expert, who shall not be a current or former employee or agent of the Project Applicant (or its designee), shall be subject to the approval of the City Attorney, which shall not be unreasonably withheld. The Project Applicant (or its designee) shall retain the expert(s) for all offset credit submissions made to the City until all offsets required this mitigation measure are acquired and accepted by the City.

If the City determines that the Project's carbon offsets at issue in the Project Applicant's (or their designee's) submission meet the requirements of this mitigation measure, the offsets required to be acquired by the Project will be proportionally reduced. Upon an affirmative finding from the City that the Project's carbon offsets are eligible for use under this measure, and within the applicable timeframe required by the first section of this mitigation measure, the Project applicant (or their designee) shall provide to the City copies of the relevant portions of the GHG offset contracts demonstrating the applicable carbon offsets have been acquired. This will serve as the final documentation required to demonstrate compliance with this mitigation measure.

If the City determines that the Project's carbon offsets do not meet the requirements of this mitigation measure, the City shall provide a detailed explanation of the basis for the City's determination. Carbon offsets not approved by the City as meeting the requirements of this mitigation measure cannot be used to reduce Project GHG emissions and the Applicant will be required to submit qualifying carbon offsets accepted by the City prior to the applicable timeframe specified in the first section of this mitigation measure.

4.1.9 Level of Significance After Mitigation

Impact GHG-1

Table 4.1-11 shows the Project's GHG construction emissions after incorporation of all PDFs and mitigation measures including carbon offsets.

Table 4.1-11. Estimated Annual Construction Greenhouse Gas Emissions – Mitigated plus Carbon Offsets

Year	CO_2	CH_4	N_2O	R	CO_2e
	Metric Tons per Year				
2025	388.92	0.02	0.04	0.34	402.52
2026	1,398.25	0.05	0.11	1.65	1,434.02
2027	1,376.54	0.04	0.11	1.48	1,410.81
2028	113.11	<0.01	0.01	0.10	114.95
				Total	**3,362.30**
				Offsets to be purchased and retired	*3,362.30*
				Remaining Emissions	**0**

Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; R = refrigerant; CO_2e = carbon dioxide equivalent; <0.01 = reported value less than 0.01. The values shown are the annual emissions reflect CalEEMod "unmitigated" output.
Totals may not sum due to rounding.
See Appendix C for complete results.

Table 4.1-12 shows the Project's GHG operational emissions after incorporation of all PDFs and mitigation measures including carbon offset credits.

Table 4.1-12. Estimated Annual Operational Greenhouse Gas Emissions – 2028 – Mitigated plus Carbon Offsets

Emission Source	CO_2	CH_4	N_2O	R	CO_2e
	Metric Tons per Year				
Mobile	2,447.19	0.13	0.09	3.08	2,479.52
Area	0	0	0	NA	0
Energy	4,714.60	0.42	0.02	NA	4,730.66
Water	35.48	0.84	0.02	NA	62.54
Waste	28.11	2.81	<0.01	NA	98.34
Refrigerant	NA	NA	NA	11.34	11.34
Stationary	25.53	<0.01	<0.01	0.00	25.61
Total	**7,250.91**	**4.20**	**0.13**	**14.42**	**7,408.02**
				Annual GHG Offsets to be Purchased	**6,009.02**
				Remaining Emissions	**1,399**
				GHG Threshold	**1,400**
				Exceed Threshold?	**No**

Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; R= refrigerant; CO_2e = carbon dioxide equivalent; <0.01 = reported value less than 0.01; N/A = not applicable.
Columns may not sum due to rounding.

See Appendix C for complete results.

As shown in Table 4.1-11 and 4.1-12, with implementation of mitigation measures specified above, the Project's emissions would be below the 1,400 MT CO_2e per year significance threshold on an annual basis for the 30-year life of the Project. Other agencies have included carbon offsets as mitigation and concluded such a measure is effective at reducing GHG impacts to less than significant. Nonetheless, for the purpose of mitigating GHG emissions, the City recognizes that uncertainty exists regarding the availability of qualifying carbon offsets and the viability of carbon offsets qualifying as feasible and effective mitigation under CEQA. Therefore, notwithstanding the imposition of MM-GHG-15, the Project's GHG impacts were determined to be **significant and unavoidable**.

Impact GHG-2

The Project would implement MM-TRA-1, MM-TRA-2 (See Section 4.2 Transportation), and MM-GHG-1 through MM-GHG-14 described above to address potential conflicts with the applicable plans.

The Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs after implementation of the above described mitigation measures that would align the Project with the goals and strategies outlined in the GHG reduction plans. The impact would be **less than significant with mitigation.**

4.1.10 Cumulative Effects

GHG emissions inherently contribute to cumulative impacts, thus any additional GHG emissions would result in a cumulative impact. Development of the Project site would support the SCAG Connect SoCal by providing local jobs, incorporating energy efficiency, water conservation, and EV parking infrastructure; and would demonstrate consistency with the Scoping Plan and General Plan. However, the Project emissions would exceed the 1,400 MT CO_2e project-specific threshold after incorporation of mitigation measures MM-GHG-1 through MM-GHG-14 and would represent a cumulatively considerable impact. Implementation of MM-GHG-15 would reduce GHG emissions below 1,400 MT CO_2e per year, however, as described above the City recognizes that uncertainty exists regarding the availability of qualifying carbon offsets and the viability of carbon offsets qualifying as feasible and effective mitigation under CEQA. Therefore, notwithstanding the imposition of MM-GHG-15, the Project's GHG impacts were determined to be **significant and unavoidable**, thus the Project would have a **cumulatively considerable impact** with respect to GHG emissions.

4.1.11 References Cited

California Association of Environmental Professionals (CAEP). 2016. Final White Paper Beyond 2020 and Newhall: A Field Guide to New CEQA Greenhouse Gas Thresholds and Climate Action Plan Targets for California. October. Available: https://califaep.org/docs/AEP-2016_Final_White_Paper.pdf. Accessed July 2025.

CAPCOA (California Air Pollution Control Officers Association). 2008. *CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*. January 2008. Accessed April 2025. https://www.contracosta.ca.gov/DocumentCenter/View/34122/CAPCOA-2008-CEQA-and-Climate-Change-PDF.

CAPCOA. 2022. *California Emissions Estimator Model (CalEEMod) User's Guide Version 2022.1*. Prepared by ICF in collaboration with Sacramento Metropolitan Air Quality Management District, Fehr & Peers, STI, and

Ramboll. April 2022. Accessed June 2023. https://www.caleemod.com/documents/user-guide/CalEEMod_User_Guide_v2022.1.pdf.

CAPCOA (California Air Pollution Control Officers Association). 2024. *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerability, and Advancing Health and Equity*. October 2024. Accessed February 2025. https://www.airquality.org/ClimateChange/Documents/2024%20Handbook%20Update_AB434.pdf.

CARB (California Air Resources Board). 2008. *Climate Change Scoping Plan: A Framework for Change*. December 2008. Accessed December 2019. https://ww2.arb.ca.gov/sites/default/files/classic//cc/scopingplan/document/adopted_scoping_plan.pdf.

CARB. 2014. *First Update to the Climate Change Scoping Plan: Building on the Framework*. May 2014. Accessed August 2014. Accessed April 2025. http://www.arb.ca.gov/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf.

CARB. 2017. *The 2017 Climate Change Scoping Plan Update*. January 20, 2017. Accessed January 2024. https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf.

CARB. 2022. *2022 Scoping Plan for Achieving Carbon Neutrality*. December 2022. Last accessed June 2023. https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents.

City of Garden Grove. 2008. General Plan. Accessed June 2025. https://ggcity.org/planning/general-plan.

CNRA (California Natural Resources Agency). 2009. *Final Statement of Reasons for Regulatory Action: Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB 97*. December 2009. Accessed April 2025. https://www.sandiegocounty.gov/content/dam/sdc/pds/ceqa/JVR/AdminRecord/IncorporatedByReference/Section-3-1-3---Greenhouse-Gas-Emissions-References/CNRA%202009%20Final_Statement_of_Reasons.pdf.

CNRA. 2018. *California's Fourth Climate Change Assessment, Statewide Summary Report*. August 2018. Last Accessed June 2023. https://www.energy.ca.gov/sites/default/files/2019-11/Statewide_Reports-SUM-CCCA4-2018-013_Statewide_Summary_Report_ADA.pdf.

EPA (U.S. Environmental Protection Agency). 2023a. "Causes of Climate Change." Last Updated April 25, 2023. Accessed June 2023. https://www.epa.gov/climatechange-science/causes-climate-change.

EPA. 2024a. "Glossary of Climate Change Terms." Accessed February 2024. https://19january2017snapshot.epa.gov/climatechange/glossary-climate-change-terms_.html.

EPA. 2024b. *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2022*. EPA 430-R-24-004. April 4, 2024. Accessed March 2025. https://www.epa.gov/system/files/documents/2024-04/us-ghg-inventory-2024-main-text_04-18-2024.pdf.

IPCC (Intergovernmental Panel on Climate Change). 1995. *IPCC Second Assessment Climate Change 1995: A Report of the Intergovernmental Panel on Climate Change*. Accessed April 2025. https://archive.ipcc.ch/pdf/climate-changes-1995/ipcc-2nd-assessment/2nd-assessment-en.pdf.

IPCC. 2007. *IPCC Fourth Assessment Synthesis of Scientific-Technical Information Relevant to Interpreting Article 2 of the U.N. Framework Convention on Climate Change*.

IPCC. 2013. *Climate Change 2013: The Physical Science Basis*. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change, edited by T.F. Stocker, D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex, and P.M. Midgley. Cambridge, United Kingdom and New York, New York: Cambridge University Press.

IPCC. 2014. *Climate Change 2014 Synthesis Report: A Report of the Intergovernmental Panel on Climate Change.* Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change. Accessed August 2016. http://www.ipcc.ch/report/ar5/syr/.

IPCC. 2023. "Summary for Policymakers." In *Climate Change 2023: Synthesis Report*. Contribution of Working Groups I, II and III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change. Geneva, Switzerland: IPCC. Accessed June 2023. https://www.ipcc.ch/report/ar6/syr/downloads/report/IPCC_AR6_SYR_SPM.pdf.

OEHHA (Office of Environmental Health Hazard Assessment). 2022. *Indicators of Climate Change in California*. 4th ed. November 2022. Accessed June 2023. https://oehha.ca.gov/media/downloads/climate-change/document/2022caindicatorsreport.pdf.

OPR (Governor's Office of Planning and Research). 2008. "CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review." June 19, 2008. Accessed April 2025. https://opr.ca.gov/ceqa/docs/20210720-june08-ceqa.pdf.

RDH. 2015. How Long Do Buildings Last? January 28, 2015. Available: https://www.rdh.com/blog/long-buildings-last/. Accessed June 2025.

SCAG (Southern California Association of Governments). 2012. Regional Greenhouse Gas Inventory and Reference Case Projections, 1990-2035. Final. May 30, 2012. Prepared by the Center for Climate Strategies. Accessed June 2025. https://scag.ca.gov/sites/default/files/old/file-attachments/05-30-12_scag_revised_if_report_final.pdf.

SCAG. 2024. *Connect SoCal 2024.* Adopted April 4, 2024. Accessed February 2025. https://scag.ca.gov/sites/default/files/2024-05/23-2987-connect-socal-2024-final-complete-040424.pdf.

SCAQMD (South Coast Air Quality Management District). 2008. *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold*. October 2008. Accessed April 2025. https://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf.

SCAQMD. 2010. Agenda for Meeting 15. Greenhouse Gases (GHG) CEQA Significance Thresholds Working Group. September 28, 2010. Accessed April 2025. https://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-main-presentation.pdf.

Translutions Inc. 2025. "Vehicle Miles Traveled (VMT) Methodology and Outputs for B-2 Hotel." September.

INTENTIONALLY LEFT BLANK

4.2 Transportation

As described in Section 2.0 Introduction, in compliance with the stipulated Writ of Mandate (Writ) and pursuant to CEQA Guidelines Section 15163, the City is preparing a SEIR to evaluate the Greenhouse Gas (GHG) and Vehicle Miles Traveled (VMT) impacts of the Project. Pursuant to the Writ, all other claims related to the Project and compliance with CEQA with respect to the Project and the approvals related to the same, that were or could have been raised, were released and dismissed with prejudice. This section describes the existing transportation conditions of the Project site and vicinity, identifies associated regulatory requirements, evaluates potential impacts of the Project by evaluating consistency with CEQA Guidelines Section 15064.3, subdivision (b) i.e., VMT impacts, and identifies mitigation measures for the proposed Project (if required). The following analysis was performed in accordance with the City of Garden Grove (City) Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment (June 2020) ("VMT Guidelines"), consistent with Senate Bill (SB) 743. A project's effect on automobile delay or level of service (LOS) is no longer a significant impact under CEQA. The VMT Guidelines identify the methodology and significance thresholds for purposes of analyzing a project's potentially significant VMT impacts. The VMT analysis prepared for the Project is also based on information provided in the following document:

Appendix D Vehicle Miles Traveled (VMT) Methodology and Outputs for B-2 Hotel, prepared by Translutions Inc. September 03, 2025

Comments received in response to the Notice of Preparation (NOP) are summarized in Table 2-1, Notice of Preparation and Comment Letters Summary, included in Chapter 2, Introduction, of this Supplemental EIR. A copy of the NOP is included in Appendix A-1 and the comment letters received in response to the NOP are included in Appendix A of this SEIR.

4.2.1 Existing Conditions

The Project is proposed for an approximately 3.72-acre property located west of Harbor Blvd. north of Twintree Avenue and approximately 1,800 feet south of Chapman Avenue. The existing regional and local roadway network in the City is a hierarchical system of highways and local streets developed to provide regional traffic movement and local access. The City can be accessed by Interstate (I)-405, I-5, and State Highway (SR)- 22 (also known as the Garden Grove Freeway) which provide regional and local connections to the surrounding cities of Anaheim, Orange, Santa Ana, Westminster, and Cypress. Local circulation within the City is provided by a primarily grid-pattern system of arterial streets. The local arterial street system is classified by a functional hierarchy that includes Principal, Major, Primary, and Secondary Arterials. The network of major roadways is primarily designed in a north-south and east-west grid pattern with major and primary arterials spaced between one mile and one-half mile intervals. Many of the major and primary arterials within the City are built out to the full paved cross-section along the entire length. Local streets generally follow the same grid pattern.

Roadway System

Figure 4.2-1, Existing Circulation System, illustrates the roadway network in the City with existing and proposed classification per the City's General Plan Circulation Element. The roadway network in the vicinity of the Project includes:

Interstate (I)-5 is an interstate and is a major regional transportation corridor and connects destinations like Anaheim, Santa Ana, and Los Angeles to the north, and Irvine and San Diego to the south. It provides access to the

City from the east and the nearest interchange is at State College Boulevard and Chapman Avenue. The corridor of I-5 near Garden Grove is a ten-lane freeway with additional carpool lanes.

State Route (SR)-22 is classified by Caltrans as a Freeway that serves as primary regional access to the City. The freeway has four general-purpose lanes and one carpool lane in each direction, plus auxiliary lanes between interchanges. There are eight interchanges on SR-22 within the City and the nearest interchange to the Project is at Harbor Boulevard. The posted speed limit on SR-22 is 55.

Chapman Avenue is classified as a Primary Arterial between Knott Avenue to the west of Beach Boulevard and west of Dale Street to Lewis Street in the City's General Plan Circulation Element. Primary arterials are designated within a 100-foot right-of-way. Bike lanes may be included on primary arterials when separate facilities are not available. In the vicinity of the Project, Chapman Avenue is built out to General Plan standards with two lanes in each direction with a raised median and left turn lanes at intersections. The posted speed limit is 40 miles per hour (mph). On-street parking is not allowed along Chapman Avenue. The roadway segment between Valley View Street and Lewis Street is a designated truck route.

Harbor Boulevard is classified as a Major Arterial between Chapman Avenue and Westminster Boulevard in the City's General Plan Circulation Element. Major arterials are designated within a 120-foot right-of-way. Bike routes may be included on major arterials when separate facilities are not available. In the vicinity of the Project, Harbor Boulevard is built out to General Plan standards with three lanes in each direction with a raised median and left turn lanes at the intersections. The posted speed limit is 40 miles per hour (mph). On-street parking is not allowed along Harbor Boulevard. The roadway segment between Westminster Avenue to north of Chapman Avenue is a designated Truck Route. Harbor Boulevard within the City of Garden Grove is also designated as an OCTA Smart Street[1].

Twintree Avenue is a Local Residential Street per City's General Plan Circulation Element. It provides access to residential driveways and on-street parking for neighborhoods. The posted speed limit is 25 mph.

Access to the Project would be provided via two new driveways: one full access driveway (signalized) on Harbor Boulevard and one full access driveway (unsignalized) on Twintree Avenue. All employee and guest access to the site, including tourist buses and shuttles, would be via the access driveway along Harbor Boulevard. The Project would restrict access to the site along Twintree Avenue to emergency vehicles, maintenance, and trash/delivery trucks only.

Public Transportation Services

OCTA provides extensive bus and rail transit service throughout Orange County. While rail service can only be accessed from the neighboring cities of Anaheim or Santa Ana, bus service is provided throughout Garden Grove by OCTA. There are 19 OCTA bus routes that have stops within the City which include local service, community shuttles, intra-county express routes serving connecting cities, and inter-county express routes. Bus routes are located on all major roads in the City. The following OCTA routes operate in the vicinity of the Project:

Route 43 is a local fixed route which provides service between the cities of Fullerton and Costa Mesa via Harbor Boulevard. Service is provided on weekdays from 3:59 a.m. to 1:45 a.m. with approximately 15 to 20-minute headways. On weekends and holidays the service has 15-minute headways during the peak hours and 30-minute

[1] Garden Grove General Plan Circulation Element: The Smart Street concept seeks to improve roadway traffic capacity and smooth traffic flow through measures such as traffic signal synchronization, bus turnouts, intersection improvements and the addition of travel lanes by removing on-street parking and consolidating driveways.

headways during off peak hours and 60-minute headways at the start and end times of the service. The nearest bus stops for OCTA Route 43 are located on the west side of Harbor Boulevard approximately 170 feet south of the Harbor Boulevard/Twintree Avenue intersection and on the east side of Harbor Boulevard approximately 250 feet north of the Habor Boulevard/Twintree Avenue intersection and within 0.5 mile (or 2,640 feet) of the Project site.

Route 54 is a local fixed route which provides service between the cities of Orange and Garden Grove via Chapman Avenue. Service is provided on weekdays from 4:48 a.m. to 10:51 a.m. with approximately 15 to 20-minute headways during peak hour and 30 minutes headways during off-peak hours. On Saturdays, Sundays and holidays the service has approximately 30-minute headways. The nearest bus stops for OCTA Route 54 are located near the Harbor Boulevard/Chapman Avenue intersection along westbound and eastbound Chapman Avenue, approximately 0.26 mile north and within 0.5 mile of the Project site.

Route 543 is an OC Bus Rapid Route which provides service between the Fullerton Transportation Center and Santa Ana via Harbor Boulevard. Service is provided only on weekdays from 4:57 a.m. to 8:02 p.m. with 20-minute headways. The nearest bus stop for OCTA Route 543 is located south of Harbor Boulevard/Chapman Avenue intersection along southbound Harbor Boulevard, approximately 0.30 mile north of the site and within 0.5 mile of the Project site.

The following Anaheim Transportation Network (ATN) routes operate in the vicinity of the Project:

Route 03 Grove Line operates as a looping fixed route, starting and ending at the Disneyland Main Transportation Center with stops throughout the Garden Grove and Anaheim regions, which includes Homewood Suites Main Gate Garden Grove, Marriott Suites Garden Grove, Delta Hotels and Residence Inn in Garden Grove.

Route 04 Harbor Line operates as a looping fixed route, starting and ending at the Disneyland Main Transportation Center with stops throughout the Garden Grove and Anaheim regions, which includes Hilton Garden Inn Anaheim/Garden Grove, and Hampton Inn Garden Grove.

Routes 03 and 04 also operate as 03/04 Combo Route starting and ending at the Disneyland Main Transportation Center with Great Wolf Lodge and Sheraton Garden Grove at stops along Harbor Boulevard.

The nearest bus stop for Route 3 Grove Line and 03/04 Combo ATN routes[2] is located along southbound Harbor Boulevard approximately 600 feet north of the Habor Boulevard/Twintree Avenue intersection, within 0.5 mile of the Project site. The nearest bus stop for Route 04 Harbor Line is located north of Harbor Boulevard/Chapman Avenue near the Embassy South, Hilton Garden and Hampton Garden Grove hotels and is approximately 0.6 mile north of the Project site.

Figure 4.2-2, Transit Facilities, illustrates the bus routes and bus stops in the vicinity of the Project.

Other Transit Services

OCTA provides ACCESS bus service for senior citizens and people with disabilities. ACCESS is a shared-ride service for people who are unable to use the regular, fixed-route bus service because of functional limitations caused by a disability. OCTA's Ridematch program helps registered users find carpool partners based on commuter schedules.

[2] The ATN Route 03 and 04 and 03/04 combo route are also popularly known as the hotel shuttles that stop at several locations including the Great Wolf Lodge, Sheraton Garden Grove and Disneyland Transportation Center and operate primarily along Harbor Boulevard.

OCTA also has vanpool services. Commuters can form groups and can apply for the vanpool service through OCTA. Commuters can get subsidies from OCTA or their employers.

Planned Transit Projects

Bus Rapid Transit (BRT) is a new approach to traditional bus travel and corridors of interest in the City include Harbor Boulevard and Westminster Avenue/17th Street. BRT is planned to offer frequent service, have its own distinct identity, offer traffic signal priority, and serve customized bus shelters that display real-time bus arrival information. The new buses will only stop at key destinations in order to provide faster service in existing transit corridors. OC Rapid Route 543is considered a variant of BRT due to its limited-stop service and streamlined routing along Harbor Boulevard.

OCTA's OC Streetcar Project will close a transit gap between Santa Ana and Garden Grove. It will operate along a 4.15-mile route that connects the Santa Ana Regional Transportation Center (SARTC) and a new transit hub at Harbor Boulevard and Westminster Avenue in Garden Grove located approximately two miles south of the Project. It will eventually connect to OCTA bus routes and to regional and intercity rail services and will provide users access to high-quality, low-cost transportation that complements existing travel infrastructure serving Southern California. The project is under construction and ridership is expected to start in 2025.

Active Transportation

Figure 4.2-3, Existing and Proposed Bike Facilities, illustrates the bike network in the City. The City's bicycle network has approximately 21.3 miles of existing bikeway facilities (Garden Grove Active Streets Master Plan, 2015). Bicycle parking can be found in select locations throughout the City's downtown. The closest bike facility near the Project is along Chapman Avenue, approximately 0.33 miles north of the Project site. There are Class II (striped) bike lanes along Chapman Avenue between West Street and Haster Street. Per the City's Master Plan of Bikeway Facilities in the Circulation Element, there are proposed Class II bike lanes along Harbor Boulevard between Chapman Avenue and Westminster Avenue and Lampson Avenue (no limits specified). The Active Streets Master Plan shows Harbor Boulevard (North City Limits to Westminster Avenue) as a Complete Street[3] including the proposed bike lane and notes that additional study is needed to determine feasibility and design of this section.

The sidewalk network in the City is thorough, particularly along major roads. However, gaps in the City's sidewalk network exist along local and residential streets. Near the Project, Harbor Boulevard and Twintree Avenue are constructed with paved sidewalks along both sides of the street. There are curb ramps and crosswalks at three legs of the Harbor Boulevard and Twintree Avenue intersection facilitated by pedestrian phasing from the traffic signal.

4.2.2 Relevant Plans, Policies, and Ordinances

Federal

There are no federal policies or regulations applicable to VMT with respect to the proposed Project.

[3] Garden Grove Active Streets Master Plan, pg 59: The term "Complete Streets" refers to designing streets for people of all ages and abilities using various travel modes such as walking, bicycling, transit, and driving.

State

Senate Bill 743

On September 27, 2013, Governor Brown signed SB 743, which became effective on January 1, 2014. The purpose of SB 743 is to streamline review under the CEQA process for several categories of development projects including the development of infill projects in transit priority areas and to balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions. SB 743 adds Chapter 2.7: Modernization of Transportation Analysis for Transit Oriented Infill Projects to the CEQA Statute (Public Resources Code Section 21099). Section 21099(d)(1) provides that aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment. In addition, SB 743 mandates that alternative metric(s) for determining impacts relative to transportation shall be developed to replace the use of LOS in CEQA documents.

In the past, environmental review of transportation impacts focused on the delay that vehicles experience at intersections and on roadway segments, which is often measured using LOS. Mitigation for impacts on vehicular delay often involves increasing roadway capacity such as widening a roadway or the size of an intersection, which in turn induces more vehicular travel and greater pollutant emissions. Additionally, improvements to increase roadway capacity can often discourage alternative modes of transportation such as biking, walking, and transit. SB 743 directed the Office of Planning and Research[4] (OPR) to develop an alternative metric(s) for analyzing transportation impacts in CEQA documents. The alternative shall promote the state's goals of reducing greenhouse gas emissions and traffic-related air pollution by promoting the development of multimodal transportation system and providing clean, efficient access to destinations. Under SB 743, LOS and vehicle delay are no longer considered significant impacts.

In December 2018, the CEQA Guidelines were updated to add Section 15064.3, Determining the Significance of Transportation Impacts, that describes specific considerations for evaluating a project's transportation impacts using VMT methodology. This new methodology was required to be used for projects starting on July 1, 2020.

CEQA Guidelines Section 15064.3(b) is divided into four subdivisions as follows:

1. **Land Use Projects.** Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop[5] or a stop along an existing high-quality transit corridor[6] should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.
2. **Transportation Projects.** Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately

[4] Effective July 1, 2024, the Governor's Office of Planning and Research was renamed the Governor's Office of Land Use and Climate Innovation (LCI).

[5] OPR's Technical Advisory 2018: Pub. Resources Code, § 21064.3 ("'Major transit stop' means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.")

[6] OPR's Technical Advisory 2018: Pub. Resources Code, § 21155 ("For purposes of this section, a high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.")

addressed at a programmatic level, such as in a regional transportation plan EIR, a lead agency may tier from that analysis as provided in Section 15152.

3. **Qualitative Analysis.** If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate.
4. **Methodology.** A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project.

The CEQA Guidelines Section 15064.3, subdivision (b)1 and (b)2 apply to the Project. The City's approved VMT Guidelines adopted screening criteria and impact criteria meant to serve as guidance for projects to determine whether a transportation impact analysis should be performed, and whether a project generates a significant transportation impact. Therefore, the City's adopted VMT Guidelines have been used in this section to determine Project's VMT impact.

Caltrans

Caltrans Draft Transportation Impact Study Guide (TISG) replaced the Guide for the Preparation of Traffic Impact Studies (Caltrans 2002). Per the 2020 TISG, Caltrans' primary review focus is VMT, replacing LOS as the metric used in CEQA transportation analyses (Caltrans 2020).

Regional

Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy

The Southern California Association of Governments (SCAG) develops the RTP, which presents the transportation vision for Los Angeles, Orange, San Bernardino, Imperial, Riverside, and Ventura Counties. SB 375 was enacted to reduce greenhouse gas emissions from automobiles and light trucks through integrated transportation, land use, housing and environmental planning. SCAG is tasked with developing a Sustainable Communities Strategy (SCS), an element of the RTP that provides a plan for meeting emissions reduction targets set forth by the California Air Resources Board (CARB). The SCS outlines the plan for integrating the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. The SCS focuses the majority of new housing and job growth in high-quality transit areas and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. This overall land use development pattern supports and complements the proposed transportation network that emphasizes system preservation, active transportation, and transportation demand management measures.

The RTP/SCS is updated every four years and SCAG adopted its current RTP/SCS, Connect SoCal 2024,in April 2024 (SCAG 2024a). The vision and goals for Connect SoCal 2024 are rooted in the direction set forth by Connect SoCal 2020. The Connect SoCal 2024 outlines a vision for a more resilient and equitable future, with policies and strategies for achieving the region's shared goals through 2050. Goals and subgoals for year 2050 pertain to building and

maintaining an integrated multimodal transportation network; developing, connecting, and sustaining livable and thriving communities; creating a healthy region for the people today and tomorrow; and supporting a sustainable, efficient, and productive regional economic environment that provides opportunities for all people. The Mobility Policies and Strategies in Connect SoCal 2024 include System Preservation and Resilience, Complete Streets, Transit and Multimodal Integration, Transportation Systems Management, and Transportation Demand Management.

Orange County Transportation Authority (OCTA)

The Orange County Transportation Authority (OCTA) serves as the county transportation planning commission, responsible for funding and implementing transit and capital projects for a balanced and sustainable transportation system (OCTA 2024). The OCTA is responsible for projects, programs and services including bus and rail transit, rideshare, environmental programs, active transportation and express lanes and freeways. This is achieved by administering a variety of Measure M[7] funding programs. On September 25, 2017, the Board of Directors approved externally rebranding M2 as OC Go to promote OCTA's Measure M awareness. The 2019 Orange County Congestion Management Program (CMP) was adopted by OCTA in November 2019. The goals of Orange County's CMP are to support regional mobility objectives by reducing traffic congestion, to provide a mechanism for coordinating land use and development decisions that support the regional economy, and to support gas tax funding eligibility. The City of Garden Grove is required to show continued compliance with the CMP in order to obtain Measure M2 funds.

OCTA is conducting a study to enhance bus travel times and reliability by implementing technology that would prioritize buses at signalized intersections. The Harbor Boulevard Pilot Innovative Transit Signal Priority (TSP) Study seeks to improve the overall efficiency of transit systems, reduce congestion and enhance the reliability of public transportation, benefiting both transit riders and overall traffic flow. The 12-mile study area along Harbor Boulevard spans five cities in central Orange County from Santa Ana to Fullerton. The study will be completed in December 2025 with its pilot study area in the City of Fullerton.

OCTA Bicycle Master Plan

The OCTA adopted the 2009 Commuter Bikeways Strategic Plan (CBSP) in May 2009 to encourage the enhancement of Orange County's regional bikeways network, in order to make bicycle commuting a more viable and attractive travel option. The plan was originally written in 1995 and is intended to create a comprehensive blueprint of the existing bikeways in the county, as well as propose new facilities to complete a network of bikeways. The 2009 CBSP is provided to the cities and the County to adopt, if they so choose. As the plan is implemented by local jurisdictions, bikeways and improved bicycle facilities will make a positive contribution to Orange County's goal of a balanced transportation system. The CBSP complies with the eligibility requirements of the Bicycle Transportation Account (BTA), which are the most stringent requirements of the available funding programs. The BTA is administered by Caltrans. The BTA is a desirable funding source, and OCTA encourages all cities and the

[7] In 1990, Orange County voters approved Measure M, a 20-year program for transportation improvements funded by a half-cent sales tax. Measure M allocates all sales tax revenues to specific Orange County transportation improvement projects in three major areas: freeways, streets and roads, and transit. Renewed Measure M (or Measure M2) was passed by the voters of Orange County in 2006 and extended the half-cent sales tax from 2011 to 2041 to fund specific transportation projects and programs in the County. The goal of M2 is to relieve congestion, improve street conditions, synchronize signals, expand Metrolink, reduce costs for seniors and persons with disabilities, and reduce transportation related air and water pollution. Revenue generated by Measure M2 is returned to local jurisdictions for use on local and regional transportation improvement and maintenance projects. Significant progress continues with projects completing construction, projects in and advancing towards construction, as well as regular funding allocations to local jurisdictions through local programs.

County to pursue these funds. (CBSP 2009). A 2.17-mile Class II bike facility is proposed along Harbor Boulevard between Chapman Avenue and Westminster Avenue in CBSP. The CBSP has not been adopted by the City.

Local

Garden Grove General Plan 2030

The Garden Grove General Plan was updated in 2008 as the City's main policy document to assist and guide local decision makers in planning the future of the City (Garden Grove 2008). In 2021, the city prepared a Focused General Plan Update and Zoning Amendments (FGPUZA), to amend the Housing, Land Use and Safety Elements; however, no updates were made to the Circulation Element. The Circulation Element identifies and establishes the City's policies governing the system of roadways, intersections, bicycle paths, pedestrian ways and other components of the circulation system, which collectively provide for the movement of people and goods throughout the City (Garden Grove 2008). The following goals are included in the Circulation Element:

Goal CIR-1 A transportation system that maximizes freedom of movement and maintains a balance between mobility, safety, cost efficiency of maintenance, and the quality of the City's environment.

Goal CIR-2 Improved traffic flows along the Garden Grove Freeway, as well as improved access along the Freeway, within the City of Garden Grove.

Goal CIR-3 Minimized intrusion of commuter traffic on local streets through residential neighborhoods.

Goal CIR-4 A reduction in vehicle miles traveled in order to create a more efficient urban form.

Goal CIR-5 Increased awareness and use of alternate forms of transportation generated in, and traveling through, the City of Garden Grove.

Goal CIR-6 A safe, appealing, and comprehensive bicycle network provides additional recreational opportunities for Garden Grove residents and employees.

Goal CIR-7 Adequate access to appropriate parking areas within the City.

Goal CIR-8 Minimized impacts associated with truck traffic through the City, as well as the parking locations of these vehicles.

Goal CIR-9 Improved aesthetic quality and maintenance of arterial highways and local roadways.

Goal CIR-10 Participation in regional transportation planning efforts to address interjurisdictional issues, and maintain competitive advantage in capital improvement funding programs, as appropriate.

Goal CIR-11 Continued compliance with regional congestion management, transportation demand, traffic improvement, air quality management, and growth management programs.

Goal CIR-12 A Citywide development phasing and monitoring program, as required by Measure M.

Goal CIR-13 Use of the OCTA right-of-way for alternative transportation systems.

The Circulation Element includes the OCTA Transit Vision and Go Local Project, which is a partnership between the Cities of Garden Grove and Santa Ana to expand the multi-modal transportation network by accommodating streetcars, bus rapid transit, automobiles, bicycles, and pedestrians. The Go Local program is a four-step process to plan and implement city-initiated transit extensions to OCTA's Metrolink commuter rail line. The Santa Ana-Garden Grove Go Local (or the OC Streetcar) would create a transportation corridor that links Garden Grove (at the Pacific Electric right-of-way/SR-22) to both the Santa Ana Civic Center and the Santa Ana Regional Transportation Center and Metrolink station (located approximately 5.8 miles from the Project).

Garden Grove Active Streets Master Plan

The City aims to increase the use of active transportation (e.g., walking, biking, and using other non-motorized devices) by residents and visitors of all ages and abilities. The City has adopted the Active Streets Master Plan 2018 to engage residents and visitors of Garden Grove toward healthier and more sustainable living through the development of a comprehensive pedestrian and biking network that provides safe and comfortable access to local parks, schools, workplaces, shopping, and dining, as well as to destinations in other Orange County communities. The goals described below are consistent with and support the Garden Grove General Plan 2030:

Mobility and Access	Increase and improve pedestrian and bicycle access to employment centers, schools, transit, recreation facilities, and other community destinations across the City of Garden Grove for people of all ages and abilities.
Safety	Improve safety for active transportation users through the design and maintenance of sidewalks, streets, intersections, and other roadway improvements such as signage, lighting, and landscaping; as well as best practice non-infrastructure programs to enhance and improve the overall safety of people walking and biking.
Infrastructure and Support Facilities	Maintain and improve the quality, operation, and integrity of the pedestrian and bicycle network infrastructure that allows for convenient and direct connections throughout Garden Grove. Increase the number of high quality support facilities to complement the network, and create public pedestrian and bicycle environments that are attractive, functional, and accessible to all people.
Non-Infrastructure Programs	Increase awareness of the value of pedestrian and bicycle travel for commute and non-commute trips through encouragement, education, enforcement, and evaluation programs that support walking and biking.
Equity	Improve accessibility for all people walking and biking through equity in public engagement, service delivery, and capital investments.
Implementation	Implement the Active Streets Master Plan over the next 20 years.

Harbor Boulevard from Westminster Avenue to north of Chapman Avenue (within the City boundary) is identified as a Resort District with Pedestrian Priority Area as well as a Complete Street corridor which warrants further evaluation.

VMT Guidelines

The City of Garden Grove VMT Guidelines outline the specific steps for complying with the CEQA requirements for VMT analysis. The VMT Guidelines address VMT project screening, methodology, significance criteria, impact assessment, and mitigation strategies.

4.2.3 Thresholds of Significance

The significance criteria used to evaluate the Project's impacts to transportation are based on CEQA Guidelines Appendix G. Pursuant to the Writ, the City must analyze the Project's potentially significant VMT impacts. VMT is addressed by Transportation Threshold b within Appendix G of the CEQA Guidelines. For the purposes of this Project, a potentially significant impact related to VMT would occur if the proposed Project would:

- Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

The VMT significance criteria as stated in the City's VMT Guidelines and used in the Project's analysis are:

A project would result in a significant project-generated VMT impact if either of the following conditions are satisfied:

- The baseline project generated VMT per service population exceeds the 15% below the County of Orange baseline VMT per service population, or
- The cumulative project generated VMT per service population exceeds 15% below the County of Orange baseline VMT per service population

The Project's effect on VMT would be considered significant if:

- The baseline or cumulative link-level boundary Citywide VMT per service population increases under the plus Project condition compared to the No Project condition.

Methodology

Vehicle Miles Traveled and Traffic Analysis Zone

CEQA Section 15064.3(a), Purpose, established VMT as the appropriate measure of transportation impacts. The subdivision (a) defines vehicle miles traveled as "the amount and distance of automobile travel attributable to a project." The term "automobile" refers to on-road passenger vehicles, specifically cars and light trucks.

As specified in the VMT Guidelines, the City of Garden Grove uses the Orange County Transportation Analysis Model (OCTAM) for detailed VMT analysis. The OCTAM is a regional travel demand model that is based on the traditional four-step transportation modeling methodology (i.e., trip generation, trip distribution, modal choice, and trip assignment). OCTAM takes into account land use types, household characteristics, transportation infrastructure, and travel costs such as transit fares, parking costs, tolls, and automobile operating costs. OCTAM uses socioeconomic data to estimate trip generation and mode choice as well as several sub-models that take into account complex travel behavior and multimodal transportation issues. OCTAM is developed and maintained by Orange County Transportation Authority (OCTA) and is designed to provide a greater level of consistency, detail, and sensitivity for transportation analyses in Orange County compared to the regional model developed by the Southern California Association of Governments (SCAG) and the statewide model developed by Caltrans.

The traffic analysis zones (TAZ) identified in OCTAM are the spatial units (or geographical areas) within which travel behavior and traffic generation are estimated in a travel demand model. The Project's VMT technical report is included in Appendix D.

4.2.4 Impacts Analysis

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

Less Than Significant Impact. In order to evaluate a project's potential VMT impacts, it is first compared against the City's VMT screening criteria. If the project does not screen out, a detailed VMT analysis is performed.

VMT Screening

The City's VMT Guidelines include three screening criteria that may be applied to screen projects from detailed VMT analysis. The criteria are described below:

1. Transit Priority Screening: Projects located within a Transit Priority Area[8] (TPA) may be presumed to have a less than significant impact absent substantial evidence to the contrary. This presumption may ***not*** be appropriate if the project:
   - Has a Floor Area Ratio (FAR) of less than 0.75;
   - Includes more parking for use by residents, customers, or employees of the project than required by the City;
   - Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Southern California Association of Governments [SCAG]); or
   - Replaces affordable residential units with a smaller number of moderate- or high-income.
2. Low VMT Area Screening: Residential and office projects located within a low VMT-generating area may be presumed to have a less than significant impact absent substantial evidence to the contrary. In addition, other employment-related and mixed-use land use projects may qualify for the use of screening if the project can reasonably be expected to generate VMT per resident, per worker, or per service population that is similar to the existing land uses in the low VMT area.
3. Project Type Screening: Some project types have been identified as presumptively less than significant. The following uses can be presumed to have a less than significant VMT impact absent substantial evidence to the contrary as their uses are local serving in nature:
   - Local-serving K-12 schools
   - Local parks
   - Day care centers
   - Local-serving retail uses less than 50,000 square feet, including: gas stations, banks, restaurants, shopping center

[8] A TPA is defined as a half mile area around an existing major transit stop or an existing stop along a high-quality transit corridor per the definitions below. Public Resources Code § 21099(a)(7)
Pub. Resources Code, § 21064.3 - 'Major transit stop' means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.
Pub. Resources Code, § 21155 - For purposes of this section, a 'high-quality transit corridor' means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

- Local-serving hotels (e.g. non-destination hotels)
- Student housing projects on or adjacent to a college campus
- Local-serving assembly uses (places of worship, community organizations)
- Community institutions (public libraries, fire stations, local government)
- Affordable, supportive, or transitional housing
- Assisted living facilities
- Senior housing (as defined by HUD)
- Local serving community colleges that are consistent with the assumptions noted in the RTP/SCS
- Projects generating less than 110 daily vehicle trips

Screening Criteria 1: The proposed Project is within a TPA[9] because it is located within a half-mile of the major transit stop: the Harbor Boulevard and Chapman Avenue intersection. This intersection is considered a major transit stop based on the frequency[10] of bus services in the City as stops for Bus Routes 43, 54, 543, and the 03/04 combo line, as discussed in Section 4.2.1. All those bus stops have a frequency of service of 20 minutes or less at morning and afternoon peak periods. The Project also proposes a FAR of more than 0.75, provides no more than the required amount of parking, is consistent with the SCAG adopted Sustainable Communities Strategy as demonstrated in Section 4.1 of this SEIR, and does not propose to demolish any affordable units. and it. Although the Project might have screened out of a detailed VMT analysis, in response to prior public comments, a Project-specific model run was conducted to assess the Project's potential VMT impacts.

Screening Criteria 2: Based on the City's Low VMT Area Map, the Project is not located in a Low VMT Area. Specifically, the Project is located in a zone which is between 0 – 15% below County's VMT threshold and therefore, cannot be screened out using the low VMT area screening.

Screening Criteria 3: The Project would not meet the Project Type screening threshold. because it is not considered a local serving use. Using the applicable trip rate of hotel use from the Institute of Transportation Engineer's Trip Generation Manual, the proposed Project would generate approximately 3,995 daily trips.

As explained above, while the Project might qualify for screening out under Screening Criteria 1, a Project-specific model run was conducted to assess the Project's potential VMT impacts.

VMT Analysis

For land use projects, per the VMT Guidelines, the analysis will evaluate "two types of VMT: (1) project generated VMT per service population and comparing it back to the appropriate benchmark noted in the thresholds of significance, and (2) the project effect on VMT, comparing how the project changes VMT on the network looking at citywide VMT per service population comparing it to the no project condition."

9 AB 2553, passed in September 2024, has revised the definition of Major Transit Stop for CEQA purposes, to be an intersection of 2 or more major bus routes with a frequency of service interval of 20 minutes or less (compared to 15 minutes previously) during the morning and afternoon peak commute periods.

10 AB 2553, passed in September 2024, has revised the definition of Major Transit Stop for CEQA purposes, to be an intersection of 2 or more major bus routes with a frequency of service interval of 20 minutes or less (compared to 15 minutes previously) during the morning and afternoon peak commute periods.

As to the first type of VMT, the analysis uses both the Total VMT per Service Population and the home-based work VMT per employee methodology.

Total VMT per Service Population: The total VMT to and from all zones in the geographic area are divided by the total service population to determine the efficiency metric of VMT per service population. The total service population is the sum of the Project user population plus the number of employees.

Home-based Work VMT per Employee: All auto vehicle trips between home and work are counted and then divided by the number of employees within the geographic area to get the efficiency metric of home-based work VMT per employee.

Thus, as the City's VMT significance thresholds require, the VMT analysis of project generated VMT compares a project's VMT per service population with the County's baseline VMT[11] per service population.

As to the second type of VMT, for a project effect on VMT, the analysis compares the baseline link-level boundary Citywide VMT per service population with and without the project. For this Project, which includes both a significant user population (e.g., hotel guests) and employment population, which independently generate vehicle trips and vehicle miles traveled, the service population requires a consideration of both populations.

The City's VMT Guidelines require analysis of four scenarios:

- Baseline Conditions No Project
- Baseline Conditions with Project
- Cumulative No Project
- Cumulative with Project

Per the City's VMT Guidelines, the most current version of OCTAM (version 5.1) with socio-economic data (SED) was used. The OCTAM model runs on the TransCAD software platform and is based on a four-step model structure, which includes trip generation, trip distribution, mode choice, and trip assignment. The model is made up of Traffic Analysis Zones (TAZs) (see Figure 4.2-4 for Project TAZ) that include the corresponding SED for each TAZ (e.g., population, employment, households, workers, and school enrollment). OCTAM has 3,142 TAZs, of which 1,741 are in Orange County. The Project is located in TAZ 521. OCTAM uses a baseline of Year 2019 conditions and a Cumulative condition forecast to Year 2050. The "with Project" conditions are developed by adding Project data to the Baseline and Cumulative scenarios.

As a resort hotel, with on-site entertainment and many amenities designed to attract families, the per room occupancy and the average occupancy rate are expected to exceed the average business or tourist hotel in the City and surrounding area. For comparison, the occupancy data from another nearby resort hotel in the City, The Great Wolf Lodge, shows an average occupancy of approximately 3 persons per room. To present a conservative analysis, an average occupancy of 2.5 was used for the proposed Project. Additionally, because uses of this nature tend to be seasonal and the resort would not be expected to achieve full capacity 365 days per year, an occupancy rate of 80% was assumed. Therefore, the total occupancy assumed for purposes of this analysis was 1,000 hotel guests in the 500-room resort hotel. This approach overstates project VMT per SP because it keeps the number of guests, the denominator, at a smaller number while keeping the project VMT, the numerator, the same. In other words, the project VMT is being divided by a smaller number

11 Baseline VMT is the VMT from the base year of the model (2019 for OCTAM)

of guests than the evidence would support thereby resulting in a higher VMT/SP than would result if a less conservative (higher) number of guests were included in the denominator.

OCTAM does not have a separate category for any type of hotel employment, including resort hotel employment. Hotel employees were coded as service employment per OCTAM Guidelines and consistent with the nature of the work. This approach is consistent with the North American Industry Classification System (NAICS) methodology that characterizes hotel employees as Service Employees and the Standard Industrial Classification (SIC) Codes incorporated into OCTAM. Based on applicant provided information, discussions with the City, other sources such as a SCAG Employment Density Study (2001), comparisons to ITE employee trip rates, review of industry sources, and SANDAG model inputs used for a High-Rise Hotel to estimate the number of employees. The VMT analysis uses the SANDAG model land use conversion of one employee per 1,550 square feet to estimate 446 employees for approximately 691,693 square feet of hotel space.

The Project TAZ was created in the OCTAM model. The Guidelines require that a project land use be added to the parent TAZ or that a separate TAZ created to contain the project land uses. On a TAZ with multiple land uses, the trips generated by each land use cannot be identified or isolated. As a result, a separate TAZ was created to estimate the project's VMT. Because OCTAM does not have a built in feature for the creation of a new TAZ, a TAZ is "borrowed" (i.e., modeling data for relevant uses in an existing TAZ are copied from that TAZ and added to a TAZ with characteristics such as external trips and employee numbers similar to the TAZ at issue) and located in the project's geographic area. In this case, the project was coded into TAZ 386 which was selected based on its similar number of external trips and employee numbers to TAZ 521 where the Project is located. Then the TAZ was connected to the adjacent roadways in the model, and the socio-economic data was updated to reflect the Project's 446 employees and 1,000 guests.

Model runs were conducted for the 2019 and 2050 conditions for both the without the project and with the project conditions with the above discussed SED and networks. The model outputs were obtained from OCTAM for both Project generated VMT and Project effect on VMT.

Project Generated VMT

A project's VMT can be calculated in the OCTAM model by using Origin/Destination methodology and the Production/Attraction methodology. The OD method quantifies the total VMT per service population and the PA method quantifies the home based work VMT per employee:

- The Origin/Destination (OD) method calculates VMT by summing all VMT from trips that either start or end within the analysis zones. It considers all vehicle trips, with "origins" being the starting points in a specific traffic analysis zone and "destinations" being the ending points in another. This method tracks all VMT from the analysis zone including intermediate stops.
- The Production/Attraction (PA) method focuses on trips originating or ending within a study area. This calculation occurs before trips are converted from person trips to vehicle trips and while their purpose is still identifiable. The PA method is useful for evaluating VMT based on specific trip purposes, such as commute VMT per employee. For uses with a significant number of customer trips such as retail, hotel, restaurant, etc. this method helps identify commute VMT related to the project which evaluates one of the primary goals of jobs-housing balance per SB-743.

For this Project, both the OD Method and the PA Method have been used to calculate the Project Generated VMT. As shown in Table 4.2-1, Project Generated OD VMT per Service Population, the County's Baseline

VMT/service population is 25.4. Table 4.2.1 identifies the VMT/service population threshold required to achieve the VMT Guidelines reduction of at least 15% below Countywide averages: 21.6. Using the OD methodology, in the Baseline Scenario, the Project is forecast to generate 15.2 VMT/service population which is below the City's VMT significance threshold of 21.6 VMT/service population. In the Cumulative Scenario, the Project is forecast to generate 13.6 VMT/service population which is also below the City's VMT significance threshold of 21.6 VMT/service population.

Table 4.2-1. Project Generated OD VMT per Service Population

Criteria	Project Baseline	Project Cumulative	Orange County Baseline
Service Population	1,446	1,446	5,784,934
OD VMT	21,914	19,659	146,761,959
OD VMT per service population	**15.2**	**13.6**	25.4
Impact Threshold			**21.6**
Potentially Significant Impact	**No**	**No**	-

Source: OCTAM Travel Demand Forecast Model, Translutions Inc.; Appendix D
(a) Baseline condition is based on OCTAM's existing baseline (year 2019).
(b) Cumulative condition is based on OCTAM's future cumulative condition (year 2050).
(c) Per the VMT Guidelines, a significant impact is identified if the Project-generated VMT per service population exceeds the impact threshold, which is 15% below the County-wide VMT per service population.

Therefore, the Project would result in a **less than significant impact** with respect to Project-generated OD VMT per service population.

Consistent with the City's VMT guidelines, to account for commute VMT, which would be generated by the hotel employees, the Project-generated PA or HBW VMT per employee was also evaluated. As shown in Table 4.2-2, Project Generated Home Based Work VMT per Employee, the County's HBW or PA VMT/employee is 17.2. Table 4.2-2 identifies the VMT/employee threshold required to achieve the VMT reduction of at least 15% below Countywide average: 14.6 VMT per employee. In the Baseline Scenario, the Project is forecast to generate 15.3 VMT/employee which is above the City's VMT significance threshold of 14.6 VMT/employee. In the Cumulative Scenario, the Project is forecast to generate 14.0 VMT/ employee which is below the City's VMT significance threshold of 14.6 VMT/service population.

Table 4.2-2. Project Generated PA or Home Based Work VMT per Employee

Criteria	Project Baseline	Project Cumulative	Orange County Baseline
Employees	446	446	1,805,476
HBW VMT	6,823	6,224	31,109,803
HBW VMT per Employee	15.3	14.0	17.2
Impact Threshold			14.6
Potentially Significant Impact	**Yes**	**No**	

Source: OCTAM Travel Demand Forecast Model, Translutions Inc.; Appendix D
(a) Baseline condition is based on OCTAM's existing baseline (year 2019).
(b) Cumulative condition is based on OCTAM's future cumulative condition (year 2050).
(c) Per the VMT Guidelines, a significant impact is identified if the Project-generated VMT per employee exceeds the impact threshold, which is 15% below the County-wide VMT per employee.

Project generated VMT per employee in the Cumulative Scenario would not exceed the City's baseline threshold VMT per employee and impacts would be less than significant. Because the Baseline Project

generated VMT per employee would exceed the City's baseline threshold of VMT per employee, the Project would result in a potentially significant impact in the Baseline Scenario. To reduce the Project's impact in the Baseline Scenario to less than significant, mitigation measures **MM-TRA-1** and **MM-TRA-2** would be implemented. After the implementation of mitigation, these impacts would be less than significant.

Project Effect on VMT

The VMT Guidelines specify that the "project effect on VMT is the link based VMT for a geographic region which is more appropriate to review to evaluate how these developments change travel behavior in the region." Per the VMT Guidelines, for a project that does not increase the link based VMT for the City, the project effect on VMT would be less than significant as the project would not have a significant adverse impact on travel behavior in the region.

To estimate the Project-effect on VMT, as required by the VMT Guidelines, citywide roadway VMT, the boundary method was used and link-level VMT within the city boundary was calculated. This method estimates VMT by multiplying the number of trips on each roadway segment within the selected boundary by the length of that segment. This approach includes all trips, including those trips that do not begin or end in the designated boundary, and captures the effect of cut-through and/or displaced (i.e. trips that change route due to increased congestion) traffic. The Project effect on VMT is calculated by dividing the citywide roadway VMT by the City's service population, in both the with and without Project conditions. As shown in Table 4.2-3, Project Effect on VMT, the boundary VMT per service population without the Project in the Baseline Scenario would be 10.96. In the Baseline Scenario with Project, the boundary VMT per service population would be the same: 10.96. In the Cumulative Scenario, the boundary VMT per service population without the Project is 11.21. In the Cumulative Scenario, the boundary VMT per service population with the Project decreases to 11.20. Therefore, the boundary VMT per service population was found to remain same under "with Project" conditions under Baseline and decrease under "with Project" conditions under and Cumulative conditions.

Table 4.2-3. Project Effect on VMT

	Baseline		Cumulative	
Criteria	With Project	Without Project	With Project	Without Project
Roadway VMT	2,920,280	2,916,309	3,114,170	3,110,743
Service Population	266,418	265,972	277,941	277,495
VMT per service population	10.96	10.96	11.20	11.21
Potentially Significant Impact	No		No	

Source: OCTAM Travel Demand Forecast Model, Translutions Inc.; Appendix D
(a) Baseline condition is based on OCTAM's existing baseline (year 2019).
(b) Cumulative condition is based on OCTAM's future cumulative condition (year 2050).
(c) Per the City's VMT Guidelines, a significant impact is identified if the VMT per service population is greater with the Project than without the Project.

Therefore, the Project's effect on VMT is considered **less than significant**.

VMT Impact Determination

As shown above, the Baseline and Cumulative Project Generated VMT per service population of 15.2 and 13.6, respectively, would be less than significant as they would not exceed the threshold of 15% below County of Orange baseline VMT per service population of 21.6. As shown above, impacts would also be less than significant as the Baseline and Cumulative link-level boundary Citywide VMT per service population would not increase under the "with Project" condition compared to the "No Project" condition for Project effect on VMT. The baseline Project Generated VMT per employee would exceed the City's baseline threshold of VMT per employee without mitigation, and the Project would result in a potentially significant impact under baseline with Project conditions. To reduce the Project's impact under baseline conditions for Project Generated VMT per employee, mitigation measures **MM-TRA-1 and MM-TRA-2** would be implemented. With the implementation of **MM-TRA-1** and **MM-TRA-2**, the Project's VMT impacts would be reduced to a **less than significant** level.

Therefore, the proposed Project would not conflict with CEQA Guidelines Section 15064.3(b).

4.2.5 Mitigation Measures

To reduce the Project Generated VMT per Employee under baseline conditions, applicable VMT reduction measures from the Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, California Air Pollution Control Officers Association (CAPCOA), October 2024 were reviewed. The following measures have been incorporated to reduce the Project Generated VMT per employee:

MM-TRA-1 Implement Commute Trip Reduction Marketing (T-7): The Project applicant shall implement a marketing strategy to promote the Project site employer's Commute Trip Reduction (CTR) program. Information sharing and marketing promote and educate employees about their travel choices to the employment location beyond driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT and GHG emissions.

However, to ensure that CTR achieves VMT reduction of at least 4%, the following measures will be incorporated:

a) The applicant shall provide on site or online commuter information services to employees. The applicant shall also distribute a quarterly newsletter with tips, success stories and updates to ensure education and encouragement for the CTR program.
b) The CTR shall require the Project applicant or their designee to appoint a Commute Program Coordinator to oversee the implementation and management of the marketing strategy.
c) The applicant shall ensure on-site or online subsidized transit pass sales are available to all employees.
d) The applicant shall provide guaranteed ride home service by matching employees with other employees or providing access to platforms such as Rideharing.com and Lyft which connect riders for daily commutes with nearby drivers.
e) A minimum of 10 preferential parking spaces for carpools/vanpools shall be provided.

MM-TRA-2 Provide End-of-Trip Bicycle Facilities (T-10): The Project shall install and maintain end-of-trip bicycle facilities for employee use. End-of-trip facilities include bike parking, bike lockers, showers, and personal lockers. The provision and maintenance of secure bike parking and related facilities encourages commuting by bicycle, thereby reducing VMT and GHG emissions. The Project design includes on-site bicycle racks to accommodate a minimum of 38 bicycle parking spaces and provide bicycle rentals for hotel guests on the ground level and32 secure bicycle parking spaces and additionally, locker and shower facilities will be provided for employees.

The implementation of MM-TRA-1 results in the reduction of VMT per employee under baseline conditions from 15.3 to 14.69, and the implementation of MM-TRA-2 further reduces the VMT per employee from 14.69 to 14.55. This results in Project Generated VMT per employee below the threshold of 14.60. These measures would also reduce the cumulative year VMT per employee, which is below the threshold of significance without any mitigation measures. Table 4.2.4 provides a summary for VMT reduction for the Project Generated VMT per employee under Baseline plus Project conditions.

Table 4.2-4. VMT Reduction for Project Generated VMT per Employee

Criteria	Value
Project Generated VMT per Employee	15.30
County's Baseline VMT Threshold	14.65
% VMT Reduction Required	4.25%
MM-TRA-1 (a,b,d,e): Commute Trip Reduction Marketing VMT Reduction	4.0%
MM-TRA-2: End-of-Trip Bicycle Facilities VMT Reduction	0.75%
% VMT Reduction[1] achieved with MM-TRA-1 (a,b,d,e) andMM-TRA-2	4.72%
Project Generated VMT per Employee with VMT Reduction	14.58
Less than Significant Impact with MM Incorporated	**Yes**
Additional VMT Reduction achieved by MM-TRA-1 c	
MM-TRA-1(c): Implement Subsidized or Discounted Transit Program	0.17%
% VMT Reduction[1] achieved with MM-TRA-1 (a,b,c,d,e) andMM-TRA-2	4.88%
Project Generated VMT per Employee with VMT Reduction	14.55

Source: VMT Reduction from Mitigation Measure, Appendix D

1 VMT Reduction% = 1 – [(1 – 4%) ∗ (1 – 0.75%)] = 4.72%

2 VMT Reduction% = 1 – [(1 – 4%) ∗ (1 – 0.75%) ∗ (1 – 0.17%)] = 4.88%

Table 4.2-4 demonstrates the amount of reduction required for the Project to result in a less than significant impact with mitigation under the Baseline Project Generated VMT per employee. The reduction in VMT achieved by the mitigation measures would exceed the 4.25% reduction required and achieve a reduction of at least 4.72% as identified in Table 4.2-4. With the implementation of MM-TRA-1(c), the VMT reduction achieved by the project would be 4.88%.

4.2.6 Level of Significance After Mitigation

With the implementation of **MM-TRA-1**and **MM-TRA-2**, the Project Generated VMT per employee under Baseline conditions would result in a **less than significant** impact. As disclosed in Section 4.2.4 above, no mitigation is required for the project to have **less than significant impacts** with respect to the Project Generated VMT per service

population under baseline and cumulative conditions, Project Generation VMT per employee under cumulative condition, and Project effect on VMT under baseline and cumulative conditions.

4.2.7 Cumulative Effects

Cumulative Effects or Impacts in the Technical Advisory (OPR 2018) state, "A project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact." Accordingly, without further analysis, a finding of a less-than-significant Project impact would equate to a less than significant cumulative impact. Nonetheless and additionally, a quantitative analysis of Project's potential for cumulatively considerable impacts was conducted per City's VMT Guidelines. As shown in Section 4.2.4, the VMT analysis of the Project under Cumulative conditions for the year 2050 was conducted using OCTAM. Based on the analysis of Project-generated VMT per service population and VMT per employee and Project-effect on VMT under cumulative conditions, the proposed Project would have a less than significant cumulative VMT impact. Therefore, cumulative effects would be **less than significant**.

4.2.8 References Cited

Caltrans. 2020. Transportation Impact Study Guide. Vehicles Miles Traveled-Focused Draft. May 2020.

CAPCOA (California Air Pollution Control Officers Association). 2024. Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity.

City of Garden Grove. 2008. Garden Grove General Plan. May 2008.

City of Garden Grove. 2018. Garden Grove Active Streets Master Plan. October 2018.

City of Garden Grove. 2021. City of Garden Grove Focused General Plan Update and Zoning Amendments Draft Environmental Report. August 18, 2021

City of Garden Grove. 2020. Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment. Adopted June 2020.

OPR (Office of Planning and Research). 2018. Technical Advisory on Evaluating Transportation Impacts in CEQA. http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.

OCTA (Orange County Transportation Commission) 2009. 2009 OCTA Commuter Bikeways Strategic Plan. Final May 2009. https://www.octa.net/pdf/bikeways09.pdf

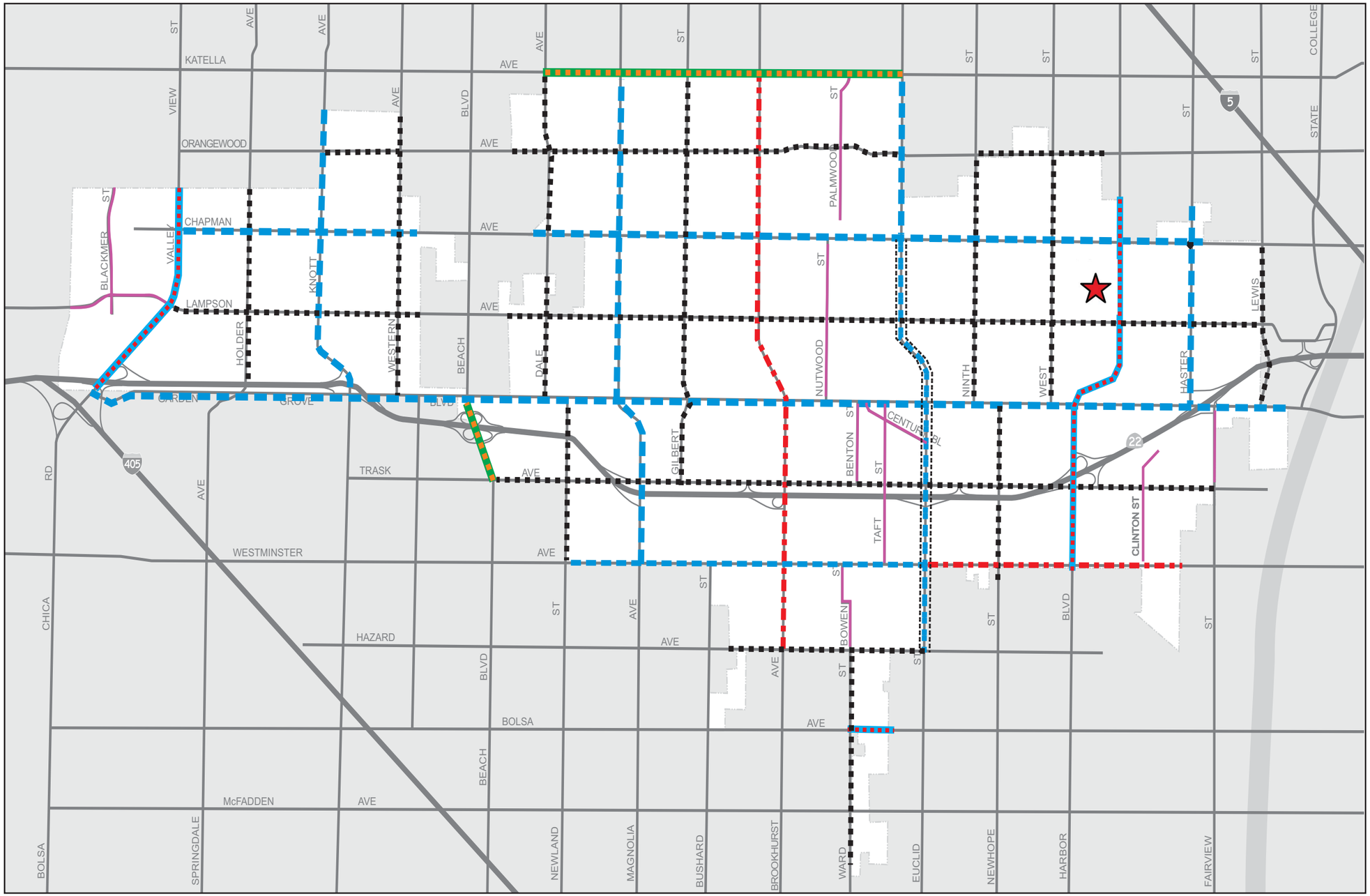
OCTA 2024. Connecting Orange County - Orange County Transportation Authority (octa.net)

SCAG. 2024a. Connect SoCal 2024, The 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments. Adopted April 2023. https://scag.ca.gov/sites/main/files/file-attachments/23-2987-connect-socal-2024-final-complete-040424.pdf?1714175547.

OPR (Office of Planning and Research). 2018. Technical Advisory on Evaluating Transportation Impacts in CEQA. http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.

Translutions Inc. VMT Methodology and Outputs for B-2 Hotel, City of Garden Grove, June 2025

INTENTIONALLY LEFT BLANK



General Plan 2030

LEGEND

- 8-lane divided roadway (Principal arterial & OCTA Smart Street)
- 6-lane divided roadway (Major arterial)
- 6-lane divided roadway (Major arterial & OCTA Smart Street)
- 6-lane divided roadway (Primary arterial)
- 4-lane divided roadway (Primary arterial)
- 4-lane undivided roadway (Secondary arterial)
- 2 to 4 lanes (Non-Master Plan of arterial highways local collectors)
- Project Location

SOURCE: RBF, ITERIS 2008

DUDEK

N

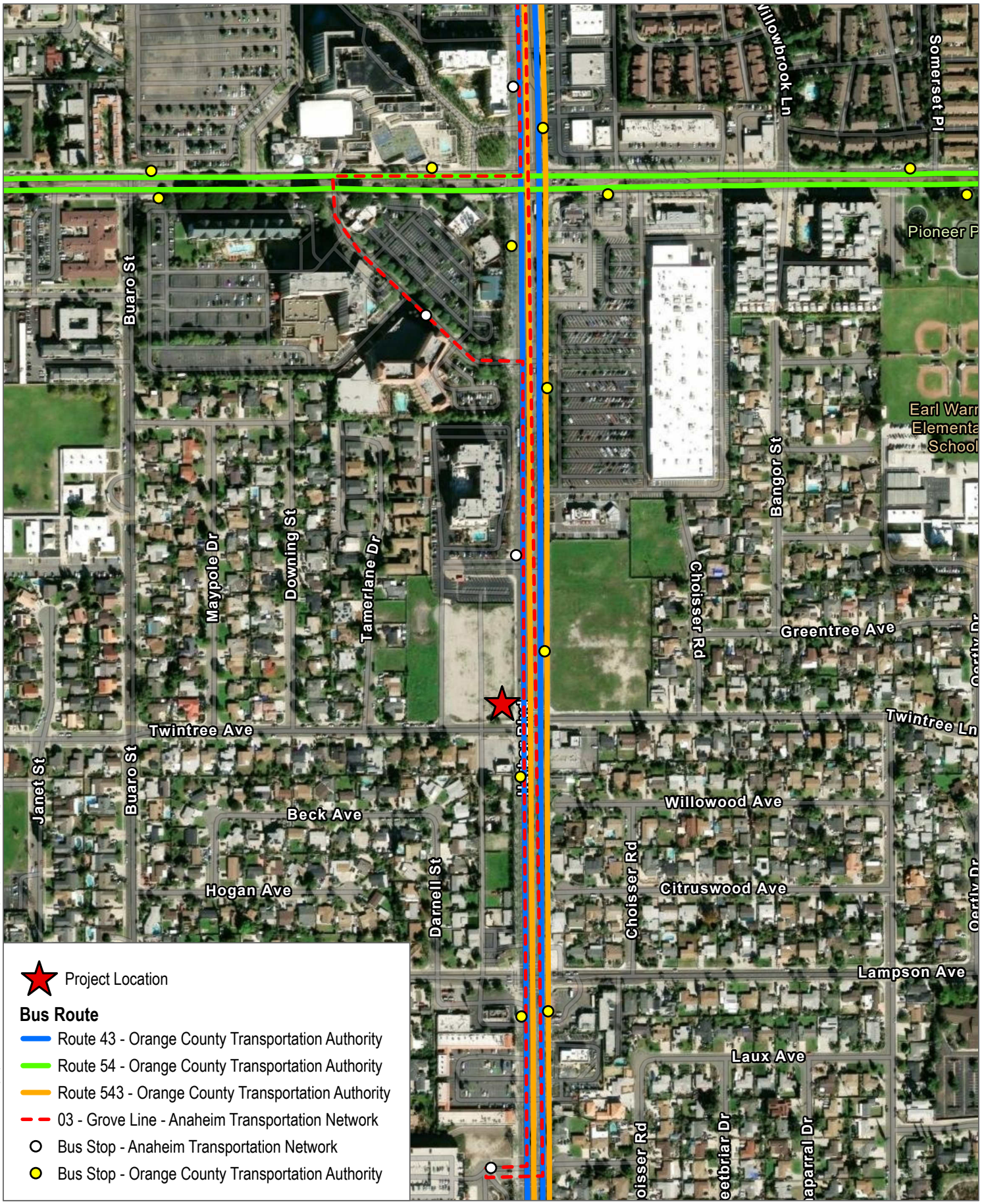
0 2,000 4,000 Feet

FIGURE 4.2-1

Existing Circulation System

B-2 Hotel Project

INTENTIONALLY LEFT BLANK



SOURCE: Orange County Transportation Authority, Anaheim Transportation Network, World Imagery

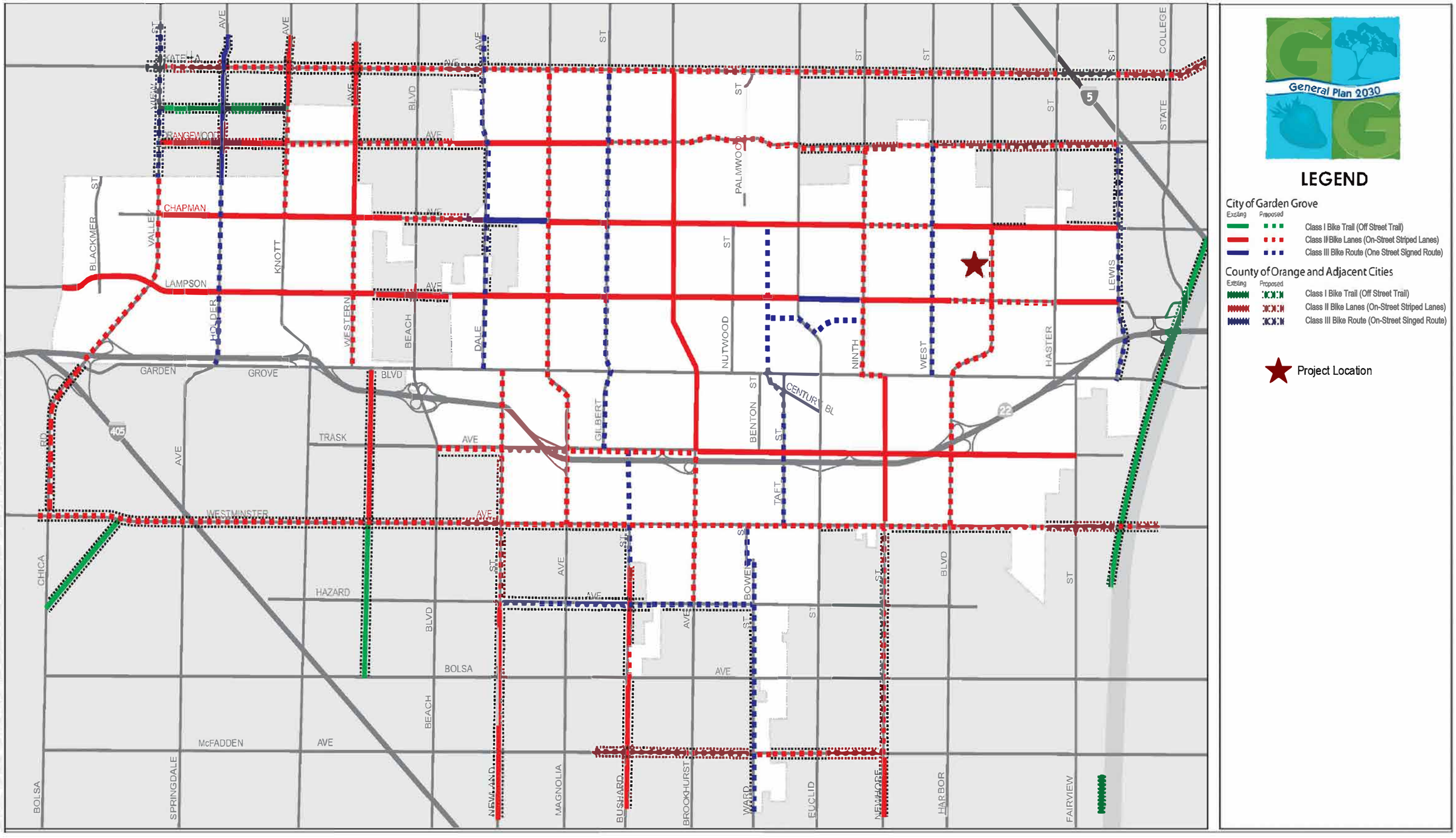
FIGURE 4.2-2

Transit Facilities

Site B-2 Hotel Project

DUDEK

INTENTIONALLY LEFT BLANK



SOURCE: RBF, ITERIS 2008

FIGURE 4.2-3

Existing and Proposed Bike Facilities

B-2 Hotel Project

DUDEK

INTENTIONALLY LEFT BLANK

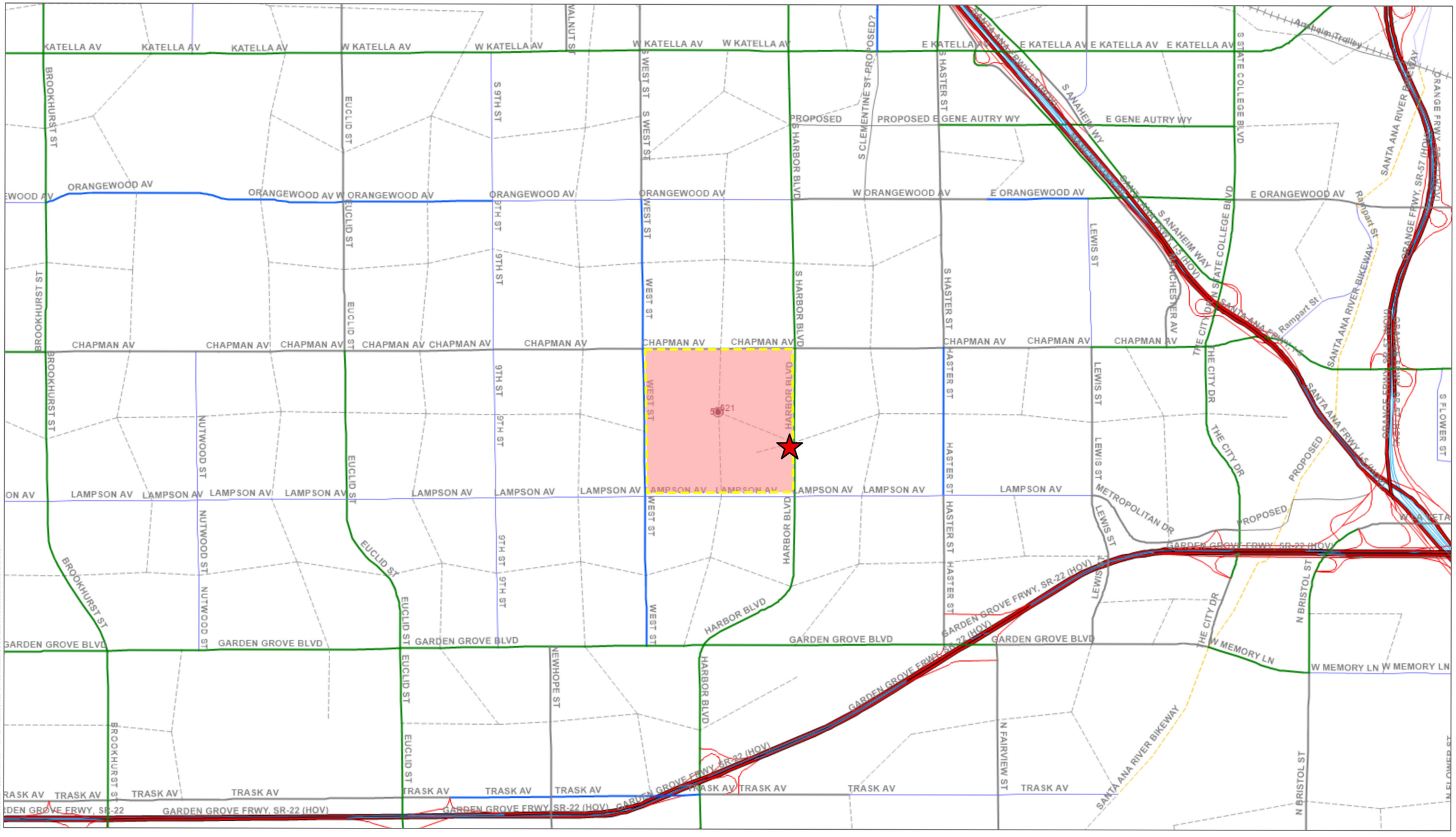


FIGURE 4.2-4

Project Traffic Analysis Zone

B-2 Hotel Project

DUDEK

INTENTIONALLY LEFT BLANK

5 Other CEQA Considerations

Pursuant to the Writ, the City and developer were directed to prepare a focused review under CEQA of the Project's or modified Project's potentially significant Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) Emissions impacts. The Writ dismissed with prejudice all other claims related to the 2022 approvals, including those arising out of the analysis of the Project in the approved MND. CEQA requires an EIR to evaluate and disclose several topic areas, typically identified as "Other CEQA Considerations" not required when a lead agency prepares a mitigated negative declaration, The City has prepared this SEIR to comply with the Writ. Therefore, this chapter discusses the following Other CEQA Considerations relative to the Project that are not evaluated when a lead agency prepares a MND: (1) significant effects that cannot be avoided, (2) significant irreversible environmental changes that would be caused by the proposed Site B-2 Hotel Project (Project) should it be implemented, and (3) growth-inducing impacts.

5.1 Effects Found Not to Be Significant

Pursuant to the Writ, the SEIR analyzes the Project's potential GHG and VMT impacts. The MND evaluated all other CEQA topic areas and determined Project impacts would be less than significant either with or without mitigation measures. That MND analysis addressed the following CEQA topic areas other than VMT and GHG: Aesthetics, Agricultural and Forest Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology/Soils, Hazards and Hazardous Materials, Hydrology/Water Quality, Land Use Planning, Mineral Resources, Noise, Population/Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities/Service Systems, Wildfire and Mandatory Findings of Significance. Pursuant to the Writ, no further analysis of those less than significant impact topics are included in the SEIR.

5.2 Significant and Unavoidable Environmental Effects

CEQA Guidelines Section 15126.2(c) requires an EIR to identify significant environmental effects that cannot be avoided if a project is implemented. As discussed in Chapter 4 of this SEIR, implementation of the Project would result in significant and unavoidable impacts related to GHG emissions. Where significant impacts were identified for GHG emissions, the SEIR imposes mitigation measures that would reduce the Project's GHG emissions; however, even with implementation of feasible mitigation, significant and unavoidable GHG emission impacts remain.

5.3 Significant Irreversible Environmental Effects

CEQA Guidelines Section 15126.2(d) requires an EIR to identify any significant irreversible environmental changes associated with a proposed project. That regulation involves an evaluation of the following:

> Uses of nonrenewable resources during the initial and continued phases of the project [that] may be irreversible since a large commitment of such resources makes removal or non-use thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as a highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the

project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Determining whether the Project could result in significant and irreversible effects requires a determination of whether key resources would be degraded or destroyed in such a way that there would be little possibility of restoring them. As an infill, resort hotel development consistent with the City's General Plan designation for the Project site, the Project does not require any extension of infrastructure to previously inaccessible areas or commit future generations to similar uses.

Approval of the Project would result in or contribute to the following irreversible environmental changes:

- Alteration of the human environment as a result of development of the Project site with a new resort hotel would irreversibly alter the existing conditions. The Project site was previously developed and demolition of the previously existing structures occurred between 2004 and 2013 in order to facilitate new development consistent with the City General Plan's International West Mixed Use (IW) designation. Although development of this infill property has been long contemplated, development of the Project would result in an irreversible change to the Project site compared to how it currently exists.
- Future construction and operation of the Project would use various new raw materials, such as lumber and forest products, metals (such as iron and steel), sand and gravel, asphalt, petrochemicals, and other materials. Some of these resources are finite and the Project would incrementally reduce those resources. The energy consumed in developing and operating the Project may be considered a permanent investment that would incrementally reduce existing, non-renewable supplies of fossil fuels, natural gas, and gasoline.
- Construction and operation of the Project, including use of natural gas, consumption of petroleum fuels and other factors disclosed in Section 4 of this SEIR, would result in emissions in excess of the GHG significance threshold. Those collective GHG emissions would be significant and unavoidable and they could result in significant and irreversible impacts.

Development of the Project would result in the irretrievable commitment of limited, slowly renewable, and nonrenewable resources, which would limit the availability of these resource quantities for future generations or for other uses during the life of individual developments. The continued use of such resources would be on a relatively small scale in a regional context. Although irreversible environmental changes would result from Project implementation, such changes would not be considered significant

5.4 Growth-Inducing Impacts

CEQA Guidelines Section 15126.2(e) requires a discussion of how the potential growth-inducing impacts of a project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Induced growth is distinguished from the direct employment, population, and/or housing growth of a project. If a project has characteristics that "may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively," then these aspects of a project must be discussed. Induced growth is any growth that exceeds planned growth and results from new development that would not have taken place in the absence of that project. Typically, the growth-inducing potential of a project would be considered significant if it stimulates population growth or a population concentration above what is assumed in local and regional land use plans, or in projections made by regional planning authorities, such as the Southern California Association of Governments (SCAG).

CEQA Guidelines Section 15126.2 also indicates that growth should not be assumed to be either beneficial or detrimental. A project may foster economic or population growth, or additional housing, either indirectly or directly, in a geographical area if it meets any one of the following criteria:

- The project would remove obstacles to population growth.
- Increases in the population that may tax existing community service facilities, causing significant environmental effects.
- The project would encourage or facilitate other activities that could significantly affect the environment.

Should a project meet any one of the above-listed criteria, it may be considered growth-inducing under CEQA. Generally, growth-inducing projects are either located in isolated, undeveloped, or underdeveloped areas, necessitating the extension of major infrastructure such as sewer and water facilities or roadways, or encourage premature or unplanned growth. Further, CEQA does not require an EIR to predict (or speculate) specifically where such growth would occur, in what form it would occur, or when it would occur.

The Project would result in the construction of a full-service high-rise resort hotel with hotel program entertainment, and a pool deck on an approximately 3.72-acre site. The Project would include 500 guest suites and employ approximately 446 individuals. Although a PUD is required for a portion of the Project site still zoned residential, the resort hotel use authorized by the PUD is consistent with the Project's existing General Plan designation of IW. The IW contemplates a mix of uses, including resort, entertainment and hotel, appropriate for a major entertainment and tourism destination (City of Garden Grove 2008).

The Project does not propose any new residential units and therefore would not result in a direct increase in population within the City. The Project would provide a new resort hotel with amenities for hotel guests in the City. The Project would also require approximately 446 additional employees given that the Project site is currently vacant. Developing the resort hotel would not necessarily generate an increase in residential population from employment needs, as employees would likely come from within the City itself and/or surrounding region. Indirectly, the Project could result in an added attractive community asset that is currently not in existence and add additional jobs to the area. However, the Project is not expected to result in population or employment growth above applicable planning forecasts, as discussed below and because the Project is consistent with the Project sites' existing General Plan designation.

According to the Connect SoCal 2024 Demographics and Growth Forecast Technical Report, the total employment population in the City in 2019 was 60,700. This City is expected to undergo an increase of 4,300 jobs between 2019 and 2035, and an additional increase of 5,500 jobs by 2050. The increase of 446 employees at full buildout of the Project would represent approximately 10% of the anticipated increase in the number of jobs within the City by 2035 and approximately 5% of the anticipated increase in the number of jobs within the City by 2050. As the Project is consistent with the Project Site's General Plan designation of IW and the resort hotel use has long been contemplated, the Project would not stimulate population growth or a population concentration above what is assumed in local and regional land use plans, or in projections made by regional planning authorities.

Indirect growth can also occur by a project installing infrastructure that can support further growth or remove impediments to growth. The Project site would be an infill development, on a previously developed property that is adequately served by existing public services and utilities. No new infrastructure or utilities would be needed to serve the Project. Therefore, indirect growth inducement as a result of the extension of these types of facilities would not occur as a result of the Project.

Overall, the Project could stimulate population growth through the addition of new employees. However, the growth would be consistent with employment growth envisioned in local and regional land use plans and in projections made by regional planning authorities because the planned growth of the Project site and its land use intensity have been factored into the underlying growth projections undertaken by the Southern California Association of Governments.

5.5 References Cited

City of Garden Grove. 2008. Garden Grove General Plan Land Use Element. https://ggcity.org/sites/default/files/LandUseElement.pdf. Accessed August 15, 2025.

Southern California Association of Governments. 2024. Connect SoCal 2024 Demographics and Growth Forecast Technical Report. https://www.scag.ca.gov/sites/default/files/2024-05/23-2987-tr-demographics-growth-forecast-final-040424.pdf. Accessed June 16, 2025.

6 Alternatives

6.1 Introduction

As explained previously, this Supplemental Environmental Impact Report (SEIR) is being prepared pursuant to the Writ. Consistent with the scope of review established by the Writ, the SEIR analyzes the Site B-2 Hotel Project's (Project) potential greenhouse gas (GHG) emissions and vehicle miles traveled (VMT) impacts. Within that context, this section provides an alternatives analysis as required by the California Environmental Quality Act (CEQA)

Pursuant to the CEQA Guidelines, an EIR must "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project" (14 CCR 15126.6[a]). An EIR "must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation" (14 CCR 15126.6[a]). This alternatives discussion is required even if these alternatives "would impede to some degree the attainment of the project objectives, or would be more costly" (14 CCR 15126.6[b]).

The CEQA Guidelines further provide that the range of alternatives is guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are included (14 CCR 15126.6[f]). The EIR need only examine alternatives that could feasibly attain most of the basic objectives of the project. "Among the factors that may be taken into account when addressing feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries … and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site."

The inclusion of an alternative in an EIR does not constitute definitive evidence that the alternative is in fact "feasible." The final decision regarding the feasibility of alternatives lies with the decision maker for a given project, who must make the necessary findings addressing the potential feasibility of an alternative, including whether it meets most of the basic project objectives or reduces the severity of significant environmental effects pursuant to CEQA (California Public Resources Code, Section 21081; see also 14 CCR 15091).

Beyond these factors, the Guidelines require the analysis of a "no project" alternative. Based on the alternatives analysis, an environmentally superior alternative must be designated. If the environmentally superior alternative is the "no project" alternative, then the EIR shall identify an environmental superior alternative among the other alternatives. (14 CCR 15126.6(e).)

6.2 Project Objectives

In developing the alternatives, consideration was given to the ability to meet the basic objectives of the proposed Project and eliminate or substantially reduce the potentially significant impacts associated with the CEQA analysis required for the Project by the Writ. As stated in Chapter 3, Project Description, of this SEIR the proposed Project

would result in the development and operation of a resort hotel in the City of Garden Grove (City). The primary objectives of the proposed Project include the following:

- Design, develop, and construct a development on an underutilized property with all required infrastructure in the immediate proximity.
- Develop a destination hotel that incorporates sustainability features such as on-site solar energy, lower water use appliances and energy saving fixtures on a property within a transit priority area.
- Provide for enhanced overnight guest experiences with themed amenities attractive to families and other visitors who will use the project as a tourist destination location in and of itself.
- Develop a project that allows for efficient operations and logistics.
- Implement the project site's International West General Plan designation by including hotel, entertainment and resort elements to promote guest visits of multiple days.
- Develop a destination hotel in a location with convenient access to public transit and a shuttle system that connects the project to other tourist attractions in the area including those along the Harbor Boulevard Resort corridor.
- Support increased tourism in the City while also complementing other tourist destinations in surrounding communities.
- Generate a material amount of transient occupancy and property tax revenue for the City.
- Generate additional construction and operational jobs to support the local and regional economy.
- Develop a facility of sufficient size and with sufficient amenities to attract a partnership with a national or international theme park franchise.

6.3 Alternatives Considered but Rejected

As set forth in CEQA Guidelines Section 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for rejection. According to the CEQA Guidelines, among the factors that may be used to eliminate an alternative from detailed consideration are the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. The following discussion presents information on alternatives to the Project that were considered but rejected. These alternatives are not discussed in further detail and have been eliminated from further consideration.

6.3.1 Alternative Site

In accordance with CEQA Guidelines, Section 15126.6(f)(2), the City attempted to identify a feasible off-site location within the Project area that could be available for the development of the Project. Pursuant to CEQA Guidelines, Section 15126.6(f)(2)(A), the key question and first step in analysis of the off-site location is whether any of the significant effects of the Project would be avoided or substantially lessened by moving the Project to another location.

After a review of available vacant parcels similar in size to the Project site and located within the Project vicinity, a parcel located immediately east of the Project site was identified. Finding an alternative vacant parcel in the Project vicinity is important because the Project site is in relatively close proximity to Disneyland (less than two miles) and the Anaheim Convention Center (approximately 1.5 miles), both of which attract overnight guests and the need for hotel rooms in the general project vicinity. While development of the Project on this parcel would achieve all of the

Project Objectives, development of the proposed Project on the footprint of that parcel would not reduce, avoid, or substantially lessen the impacts from the Project. The same GHG emissions and VMT impacts would occur just in a location on the east side of Harbor Boulevard instead of on the west side of Harbor Boulevard.

Additionally, neither the City nor the Project applicant own this parcel to the east such that the Project could be developed on an alternate site. The City is not aware of any other alternative site that would meet CEQA's criteria for purposes of an alternatives analysis. It is unlikely and speculative to assume the feasibility of assembling another site similar to the Project site with the correct General Plan designation, that meets most of the Project Objectives and avoids or substantially lessens the Project's potential significant impacts. (14 CCR 15126(f)(2)(3).) Therefore, off-site locations capable of accommodating the entire Project are considered infeasible and would not avoid or substantially lessen the impacts of the Project. No off-site location alternatives were carried forward in this analysis.

6.3.2 Hotel-Only Alternative

The City considered an alternative that would result in the construction and operation of a hotel only, without the inclusion of the waterpark and additional resort amenities associated with the Project. Under the hotel-only alternative, the hotel would operate in a manner similar to other hotels along the Harbor Boulevard corridor. The hotel would likely house guests visiting nearby area attractions, but would not serve as a destination in and of itself. Similar to the Project, the hotel-only alternative would likely result in home-based work VMT per employee impacts that are less than significant with mitigation incorporated since the hotel-only alternative would still require employee trips. Additionally, the hotel-only alternative would result in similar operational GHG emissions in comparison to the project. As such, the hotel-only alternative would not eliminate or substantially avoid the Project's impacts. Furthermore, the hotel-only alternative would not achieve the following Project objectives:

- Develop a destination hotel that incorporates sustainability features such as on-site solar energy, lower water use appliances and energy saving fixtures on a property within a transit priority area.
- Provide for enhanced overnight guest experiences with themed amenities attractive to families and other visitors who will use the project as a tourist destination location in and of itself.
- Develop a facility of sufficient size and with sufficient amenities to attract a partnership with a national or international theme park franchise.

As such, a hotel-only alternative was considered but rejected from further consideration as a Project alternative.

6.3.3 Resort-Only Alternative

The City considered an alternative that would result in the construction and operation of a resort on the Project site that does not include the accompanying hotel component. The resort would serve as a destination; however, no overnight guests or accommodations would be included. This alternative would increase the number of vehicle trips associated with VMT because people would be traveling to and from the Project site on the same day, without staying the night. The increase in vehicle trips associated with VMT would lead to increased GHG emissions when compared with the proposed Project. As such, the increase in the number of vehicle trips associated with VMT, and GHG emissions associated with the resort-only alternative would not avoid or substantially lessen the Project's potential significant impacts. Furthermore, this alternative would not achieve the following Project objectives:

- Develop a destination hotel that incorporates sustainability features such as on-site solar energy, lower water use appliances and energy saving fixtures on a property within a transit priority area.

- Provide for enhanced overnight guest experiences with themed amenities attractive to families and other visitors who will use the project as a tourist destination location in and of itself.
- Implement the project site's International West General Plan designation by including hotel, entertainment and resort elements to promote guest visits of multiple days.
- Develop a destination hotel in a location with convenient access to public transit and a shuttle system that connects the project to other tourist attractions in the area including those along the Harbor Boulevard Resort corridor.
- Generate a material amount of transient occupancy and property tax revenue for the City.

As such, a resort-only alternative was considered but rejected from further consideration as a Project alternative.

6.3.4 Residential Alternative

The City considered an alternative that would result in the construction and operation of a residential development on the Project site instead of the proposed resort hotel. Under this alternative, the residential uses at the Project site might result in fewer environmental impacts than the proposed Project relative to GHG emissions and VMT. The residential alternative is anticipated to result in fewer environmental impacts than the proposed Project because the Project site is in proximity to transit and would likely screen out from a VMT analysis conclude that VMT impacts would be less than significant. The reduction in vehicle trips related to VMT would also lead to a decrease in GHG emissions. However, an exclusively residential alternative would be inconsistent with the primary General Plan and zoning designation on the Project site and would not meet the following Project objectives:

- Develop a destination hotel that incorporates sustainability features such as on-site solar energy, lower water use appliances and energy saving fixtures on a property within a transit priority area.
- Provide for enhanced overnight guest experiences with themed amenities attractive to families and other visitors who will use the project as a tourist destination location in and of itself.
- Implement the project site's International West General Plan designation by including hotel, entertainment and resort elements to promote guest visits of multiple days.
- Develop a destination hotel in a location with convenient access to public transit and a shuttle system that connects the project to other tourist attractions in the area including those along the Harbor Boulevard Resort corridor.
- Support increased tourism in the City while also complementing other tourist destinations in surrounding communities.
- Generate a material amount of transient occupancy and property tax revenue for the City.
- Generate additional construction and operational jobs to support the local and regional economy.
- Develop a facility of sufficient size and with sufficient amenities to attract a partnership with a national or international theme park franchise.

For these reasons, a residential alternative was considered but rejected from further consideration as a Project alternative.

6.3.5 Commercial Alternative

The City considered an alternative that would result in the construction and operation of a retail commercial development on the Project site. Under this alternative, the Project site would become a retail commercial

destination, thereby increasing the potential for vehicle trips associated with VMT, and operational GHG vehicle emissions when compared with the proposed Project. The commercial alternative would increase the potential for the vehicle trips associated with VMT, and operational GHG vehicle emissions because the trip rate and associated VMT for retail commercial destinations is generally higher than that associated with the Project. An increase in VMT would also result in increased operational GHG vehicle emissions. Additionally, this alternative would not meet the following Project objectives:

- Develop a destination hotel that incorporates sustainability features such as on-site solar energy, lower water use appliances and energy saving fixtures on a property within a transit priority area.
- Provide for enhanced overnight guest experiences with themed amenities attractive to families and other visitors who will use the project as a tourist destination location in and of itself.
- Implement the project site's International West General Plan designation by including hotel, entertainment and resort elements to promote guest visits of multiple days.
- Develop a destination hotel in a location with convenient access to public transit and a shuttle system that connects the project to other tourist attractions in the area including those along the Harbor Boulevard Resort corridor.
- Support increased tourism in the City while also complementing other tourist destinations in surrounding communities.
- Generate a material amount of transient occupancy and property tax revenue for the City.
- Generate additional construction and operational jobs to support the local and regional economy.
- Develop a facility of sufficient size and with sufficient amenities to attract a partnership with a national or international theme park franchise.

For these reasons, a residential alternative was considered but rejected from further consideration as a Project alternative.

6.3.6 Mixed-Use Development Alternative

The City considered an alternative that would result in the construction and operation of a mixture of uses that could include a combination of residential, commercial, retail, and/or hotel. However, the majority of the Project site has a general plan designation of, and is zoned International West, which encourages hotel, entertainment, and resort uses on the Project site. Similar, to the residential alternative discussed above, VMT associated with the potential residential component of a mixed-use development would likely be screened out and result in less than significant impacts due to the Project site's proximity to a major transit stop. The other potential components of a mixed-use development alternative, including retail, commercial, and/or hotel, would result in vehicle trips associated with VMT impacts that are similar to or greater than VMT associated with the Project. This would result in operational GHG emissions that are similar to the Project. While the hotel use might partially satisfy portions of some of the Project Objectives, this alternative would not achieve the following Project objectives:

- Develop a destination hotel that incorporates sustainability features such as on-site solar energy, lower water use appliances and energy saving fixtures on a property within a transit priority area.
- Provide for enhanced overnight guest experiences with themed amenities attractive to families and other visitors who will use the project as a tourist destination location in and of itself.

- Implement the project site's International West General Plan designation by including hotel, entertainment and resort elements to promote guest visits of multiple days.
- Develop a destination hotel in a location with convenient access to public transit and a shuttle system that connects the project to other tourist attractions in the area including those along the Harbor Boulevard Resort corridor.
- Support increased tourism in the City while also complementing other tourist destinations in surrounding communities.
- Generate a material amount of transient occupancy and property tax revenue for the City.
- Develop a facility of sufficient size and with sufficient amenities to attract a partnership with a national or international theme park franchise.

For these reasons, a mixed-use development alternative was considered but rejected from further consideration as a Project alternative.

6.4 Alternatives Under Consideration

6.4.1 Alternative 1 – No Project Alternative

Under Alternative 1, development of the Project would not occur as discussed in Chapter 3, Project Description, of this Draft SEIR. The Project site would remain unchanged, and no development activity would occur. As a result, approval of the proposed Zone Change to Planned Unit Development and grading, building, and occupancy permits to develop the vacant and underutilized site would not be necessary, as no new development would occur on the Project site that would trigger such actions. Alternative 1 would have no visitor or workforce vehicle trips associated with VMT, nor would it generate GHG emissions compared to the proposed Project.

Environmental Analysis

Greenhouse Gas Emissions

As discussed in Section 4.1, Greenhouse Gas Emissions, the Project would result in significant and unavoidable GHG impacts from Project operations due to elements such as energy sources as well as mobile sources, such as operational vehicle trips. With mitigation measures MM-GHG-1 through MM-GHG-15, the total GHG emissions would be below the level of significance. However, impacts were determined to be significant and unavoidable due to the uncertainty associated with GHG carbon offsets.

Under Alternative 1, the Project would not be constructed or operated, and as such, no GHG emissions would be generated on the Project site. As a result, Alternative 1 would eliminate GHG impacts compared to the proposed Project and would avoid significant and unavoidable GHG impacts.

Vehicle Miles Traveled

As discussed in Section 4.2, Transportation, the Project would result in less than significant VMT impacts with implementation of mitigation measures MM-TRA-1 and MM-TRA-2. Under Alternative 1, the Project would not be constructed or operated, and as such, no vehicle trips would be associated with the Project site. As a result, Alternative 1 would eliminate VMT impacts compared to the proposed Project.

Project Objectives

Under Alternative 1, the land on the Project site would remain vacant, and no new construction would be developed on the Project site. As shown in Table 6-1, Alternative 1 does not meet any of the Project objectives.

Table 6-1. Summary of Alternative 1 Success at Meeting Project Objectives

Project Objective	Does Alternative 1 Meet Objective?
Design, develop, and construct a development on an underutilized property with all required infrastructure in the immediate proximity.	**No**. Under Alternative 1, the Project would not be constructed, and the Project site would continue to remain underutilized.
Develop a destination hotel that incorporates sustainability features such as on-site solar energy, lower water use appliances and energy saving fixtures on a property within a transit priority area.	**No**. Under Alternative 1, the Project would not be constructed, and as such, the site would not be developed in a destination hotel within a transit priority area.
Provide for enhanced overnight guest experiences with themed amenities attractive to families and other visitors who will use the project as a tourist destination location in and of itself.	**No**. Under Alternative 1, the Project would not be constructed, and no new overnight guest experiences would be provided on the Project site.
Develop a project that allows for efficient operations and logistics.	**No**. Under Alternative 1, the Project would not be constructed, and therefore, an efficiently operating Project would not be developed.
Implement the project site's International West General Plan designation by including hotel, entertainment and resort elements to promote guest visits of multiple days.	**No**. Under Alternative 1, the Project would not be constructed, and no new hotel, entertainment, or resort elements would be introduced to the Project site.
Develop a destination hotel in a location with convenient access to public transit and a shuttle system that connects the project to other tourist attractions in the area including those along the Harbor Boulevard Resort corridor.	**No**. Under Alternative 1, the Project would not be constructed, and no new destination hotel would be introduced along the Harbor Boulevard Resort corridor.
Support increased tourism in the City while also complementing other tourist destinations in surrounding communities.	**No**. Under Alternative 1, the Project would not be constructed, and the site would not result in or support increased tourism.
Generate a material amount of transient occupancy and property tax revenue for the City.	**No**. Under Alternative 1, the Project would not be constructed, and no new sources of transient occupancy and property taxes would be introduced on the Project site.
Generate additional construction and operational jobs to support the local and regional economy.	**No**. Under Alternative 1, the Project would not be constructed, and no new sources of construction or operational jobs would be introduced at the Project site.
Develop a facility of sufficient size and with sufficient amenities to attract a partnership with a national or international theme park franchise.	**No**. Under Alternative 1, the Project would not be constructed, and no new partnerships with national or international franchises would occur.

6.4.2 Alternative 2 – Reduced Project Alternative

The City considered an alternative that would result in the construction and operation of a development that is reduced in size. The size of this alternative project was selected based on its ability to avoid or substantially lessen the Project's significant impact. On this basis, the reduced project alternative would have an 85% reduction in total building square footage, resulting in 75 hotel rooms, and an 85% reduction in recreational water facilities (pool and lazy river) to serve the reduced hotel rooms. Other amenities such as the theater, larger meeting rooms, grand ballroom, arcade, and multiple restaurants would be eliminated due to size constraints imposed by the reduced project alternative. Similarly, with the limited square footage, retail, a single restaurant and other amenities like a spa and fitness facility included with the Project would either be substantially reduced due to size constraints or likely not practical because of the substantially reduced number of guests. As such, this hotel would be considered a limited-service hotel. As described in detail below, reduced project alternative would avoid the proposed Project's significant GHG emissions impact.

The reduced project alternative, however, would underutilize one of the larger undeveloped parcels in the City's IW land use designated area that allows a maximum floor area ratio (FAR) of 5.0. The reduced project alternative would result in an FAR of only approximately 0.75 on the 3.72-acre Project site. The smaller size of the reduced project alternative on such a relatively large site also likely makes the hotel operations and cost structure less efficient than a development like the Project where economies of scale and greater buying power create natural efficiencies.

Although total vehicle trips would decrease substantially under the reduced project alternative and VMT impacts would also be less than significant, guests of the reduced project alternative would likely drive more to other locations in the region for things such as meals and entertainment compared to the Project. The reduced project alternative would not be a destination in and of itself with substantial guest amenities and services. With the reduced amenities and services in the reduced project alternative, the alternative, in and of itself, would not provide tourists with enhanced overnight guest experiences with themed amenities attractive to families and other visitors.

Similarly, the size and limited features mean the reduced project alternative would be insufficient to entice a national or international theme park franchise arrangement and would instead be considered a limited-service hotel. According to industry data, theme park branded hotels typically range from many hundreds of rooms to more than several thousand whereas the reduced project alternative provides only 75 rooms. Because the reduced project would avoid the Project's potentially significant GHG impact and also have less than significant VMT impacts, however, the reduced project alternative was brought forward for analysis, though it would not meet or only potentially partially meet most of the Project objectives including the following:

- Develop a destination hotel that incorporates sustainability features such as on-site solar energy, lower water use appliances and energy saving fixtures on a property within a transit priority area.
- Provide for enhanced overnight guest experiences with themed amenities attractive to families and other visitors who will use the project as a tourist destination location in and of itself.
- Develop a project that allows for efficient operations and logistics.
- Implement the project site's International West General Plan designation by including hotel, entertainment and resort elements to promote guest visits of multiple days.
- Develop a destination hotel in a location with convenient access to public transit and a shuttle system that connects the project to other tourist attractions in the area including those along the Harbor Boulevard Resort corridor.

- Support increased tourism in the City while also complementing other tourist destinations in surrounding communities.
- Generate a material amount of transient occupancy and property tax revenue for the City
- Develop a facility of sufficient size and with sufficient amenities to attract a partnership with a national or international theme park franchise.

Environmental Analysis

Greenhouse Gas Emissions

As discussed in Section 4.1, Greenhouse Gas Emissions, the Project would result in significant and unavoidable GHG impacts from Project operations due to GHG emissions from Project construction and operations exceeding the SCAQMD's 1,400 MT CO_2e per year threshold of significance. With mitigation measures MM-GHG-1 through MM-GHG-15, the total GHG emissions would be below the level of significance. However, impacts were determined to be significant and unavoidable due to the uncertainty associated with GHG carbon offsets measures imposed by MM-GHG-15.

Similar to the Project, construction and operation of the reduced project alternative would generate GHG emissions through vehicle trips by hotel guests, employees, and vendors to and from the Project site; area sources such landscape maintenance equipment operation; energy use (generation of electricity consumed by the Project and natural gas use); solid waste disposal; water supply, treatment, and distribution and wastewater treatment; refrigerants; and stationary sources (emergency generator). Because the reduced project alternative would result in less rooms and less amenities compared to the Project, operational emissions would be substantially reduced compared to the Project. The reduced project alternative would also result in construction-related GHG emissions, but less than anticipated for the Project given the reduced scope of the development contemplated by the reduced project alternative.

CalEEMod was used to calculate the annual construction and operational GHG emissions for the reduced project alternative. CalEEMod values consistent with the Project scenario were applied and were then adjusted as necessary to reflect the reduced operational and construction characteristics of the reduced project alternative. For example, CalEEMod adjustments for the reduced project alternative include reduction in hotel rooms and square footage, reduced energy consumption, reduced water consumption, and reduced vertical building construction and architectural coating phases during construction. An example of CalEEMod values that were kept the same for the reduced project alternative and the Project are trip rates as overall estimated trips are a function of both trip rates and rooms; therefore, only the rooms were reduced, and the trip rates remain the same. The emergency generator included in the proposed Project (stationary source) was also assumed for the reduced project alternative. Even though the reduced project alternative would likely have reduced engine size and horsepower requirements, to ensure a conservative analysis, the modeling assumed the same engine size for the reduced project alternative as the proposed Project. Additional reduced project alternative assumptions are provided in the CalEEMod output in Appendix E.

Table 6-2 presents the unmitigated construction emissions for the reduced project alternative in 2025 through 2027 as well as the amortized construction emissions.

Table 6-2. Reduced Project Alternative Estimated Annual Construction Greenhouse Gas Emissions - Unmitigated

Year	CO_2	CH_4	N_2O	R	CO_2e
	Metric Tons per Year				
2025	397.94	0.02	0.04	0.34	411.57
2026	1,480.40	0.05	0.11	1.61	1,515.70
2027	50.53	0.00	0.00	0.03	51.01
				Total	**1,978.27**
				Amortized 30-Year Construction Emissions	*65.94*

Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; R = refrigerant; CO_2e = carbon dioxide equivalent; <0.01 = reported value less than 0.01.
Totals may not sum due to rounding.
No mitigation is included in the reduced project alternative GHG emissions modeling.
See Appendix E for complete results.

As shown in Table 6-2, the estimated total GHG emissions during construction of the reduced project alternative would be approximately 1,978 MT CO_2e over the construction period. Estimated reduced project alternative-generated construction emissions amortized over 30 years would be approximately 66 MT CO_2e per year.

The estimated unmitigated operational GHG emissions for the reduced project alternative are shown in Table 6-3.

Table 6-3. Reduced Project Alternative Estimated Annual Operational Greenhouse Gas Emissions – 2028 - Unmitigated

Emission Source	CO_2	CH_4	N_2O	R	CO_2e
	Metric Tons per Year				
Mobile	392.19	0.02	0.02	0.49	398.29
Area	2.19	0.00	0.00	NA	2.19
Energy	747.33	0.07	<0.01	NA	749.91
Water	6.02	0.14	<0.01	NA	10.53
Waste	5.62	0.56	0.00	NA	19.67
Refrigerant	NA	NA	NA	16.20	16.20
Stationary	25.53	0.00	0.00	0.00	25.61
Total	**1,178.88**	**0.79**	**0.02**	**16.68**	**1,222.40**
				Amortized 30-Year Construction Emissions	*65.94*
				Reduced Project Operation + Amortized Construction Total	**1,288.34**
				GHG Threshold	**1,400**
				Exceed Threshold?	**No**

Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; R= refrigerant; CO_2e = carbon dioxide equivalent; <0.01 = reported value less than 0.01; NA = not applicable.
Columns may not sum due to rounding.
No mitigation is included in the reduced project alternative GHG emissions modeling.
See Appendix E for complete results.

As shown in Table 6-3, the reduced project alternative would result in approximately 1,220 MT CO_2e per year without amortized construction emissions and 1,288 MT CO_2e per year with amortized construction emissions. Accordingly,

the reduced project alternative's operational emissions plus amortized construction emissions would not exceed the applied threshold of 1,400 MT CO_2e per year and impacts would be less than significant without mitigation.

Table 6-4 presents a comparison of the Project's GHG emissions to the reduced project alternative's GHG emissions by emission source (in CO_2e per year).

Table 6-4. Comparison of the Project and Reduced Project Alternative Estimated Annual Greenhouse Gas Emissions – 2028 - Unmitigated

Emission Source	Reduced Project Alternative	Proposed Project
	MT CO_2e per year	
Mobile	398.29	2,655.24
Area	2.19	14.63
Energy	749.91	4,999.39
Water	10.53	70.19
Waste	19.67	131.11
Refrigerant	16.2	107.99
Stationary	25.61	25.61
Total	**1,222.40**	**8,004.17**
Amortized 30-Year Construction Emissions	**65.94**	**120.31**
Project Operation + Amortized Construction Total	**1,288.34**	**8,124.48**
Threshold	**1,400**	**1,400**
Significant	**No**	**Yes**

Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; R= refrigerant; CO_2e = carbon dioxide equivalent.
Columns may not sum due to rounding.
See Appendix E for complete results.

The reduced project alternative would result in an overall reduction of approximately 6,836 MT CO_2e per year or approximately 84% reduction in operational and amortized construction GHG emissions.

While the reduced project alternative would not require GHG-related mitigation, the Project would require mitigation to reduce emissions below the applicable threshold of significance. With mitigation, including GHG offsets, the Project would reduce emissions below the 1,400 MT CO_2e per year threshold. However, as disclosed in Section 4.1, Project GHG impacts were determined to be significant and unavoidable due to the uncertainty associated with GHG carbon offsets imposed by MM-GHG-15.

Section 4.1, Greenhouse Gas Emissions, found that Project would result in a potentially significant impact regarding potential to conflict with a GHG reduction plan (Impact GHG-2). However, with implementation of MM-TRA-1, MM-TRA-2, and MM-GHG-1 through MM-GHG-14 the potential conflicts would be resolved, and the Project would have a less than significant impact with mitigation.

The following evaluates whether the reduced project alternative would potentially conflict with a GHG reduction plan.

Connect SoCal 2024 Plan

The reduced project alternative presents a potential conflict with regional goals for transit-oriented, high-density development due to its low floor area ratio and limited amenities. While it aligns with sustainability and mobility objectives by reducing GHG emissions and VMT, it remains only partially consistent with broader GHG reduction plan goals of placing developments of greater intensity on infill locations in transit priority areas. Compared to the proposed Project, which better supports land use efficiency and transit-oriented development, the reduced project alternative is less aligned overall with the plan even though it does not conflict with the plan.

California Scoping Plan

The reduced project alternative would avoid significant GHG impacts without requiring mitigation, aligning well with the Scoping Plan's climate goals. However, it lacks the scale of the proposed Project and the reduced scale likely means fewer sustainability features than offered by the proposed Project. While it presents fewer conflicts than the proposed Project in terms of GHG reduction, and the reduced project alternative does not conflict with the plan, the reduced project alternative is less effective in advancing some of the sustainable infrastructure and economic development elements intended to help achieve GHG reductions.

City of Garden Grove General Plan

Compared to the proposed Project, the reduced project alternative would result in lower GHG emissions consistent with the General Plan's GHG reduction goals and policies and would otherwise be required to substantially conform to the General Plan's applicable GHG reduction measures to secure an approval. Thus, the reduced project alternative would not conflict with the General Plan's goals and policies adopted for the purpose of reducing GHG emissions.

The reduced project alternative underutilizes a transit-priority site with a lower FAR, lacks the intensity and amenities that would make the development a visitor attraction in and of itself, and does not support regional goals for compact, mixed-use, transit-oriented development. However, with its reduced GHG emissions, compliance with laws and overall reduced intensity of development, the reduced project alternative would not conflict with applicable plans policies, or regulations adopted for the purpose of reducing the emissions of GHG.

Vehicle Miles Traveled

As discussed in Section 4.2, Transportation, the Project would result in less than significant VMT impacts with implementation of mitigation measures MM-TRA-1 and MM-TRA-2. Under Alternative 2, the reduced project alternative would result in the construction of a smaller-scale, local serving (i.e., non-destination) hotel. As detailed in the City of Garden Grove TIA Guidelines (City of Garden Grove 2020), there are three independent screening criteria that determine whether projects require a project specific VMT assessment. Step 1 screens out projects that are located within a transit priority area, Step 2 screens out residential or office projects located within a low VMT-generation area, and Step 3 screens out certain types of locally serving projects. Step 3's list of locally serving projects includes local-serving hotels (e.g., non-destination hotels). Because of the size of the reduced project alternative (i.e., 75 hotel rooms and a 85% reduction in the aquatic amenities), and the elimination or substantial reduction in amenities such as the theater, restaurants, meeting facilities and branded activities, the reduced project alternative would no longer result in the construction of a destination hotel and instead would be considered a limited-service, or local-serving, hotel. As such, the reduced project alternative would at least be screened out under Step 3 of the screening criteria, and VMT impacts of the reduced project alternative would be less than significant and potentially reduced when compared to the proposed Project.

Project Objectives

Under Alternative 2, a reduced project would be developed on the Project site. As shown in Table 6-5, Alternative 2 does not meet or only potentially partially meets most of the Project objectives.

Table 6-5. Summary of Alternative 2 Success at Meeting Project Objectives

Project Objective	Does Alternative 2 Meet Objective?
Design, develop, and construct a development on an underutilized property with all required infrastructure in the immediate proximity.	**Yes**. Under Alternative 2, a reduced project would be constructed on the Project site thereby redeveloping an underutilized property with all required infrastructure in the immediate vicinity.
Develop a destination hotel that incorporates sustainability features such as on-site solar energy, lower water use appliances and energy saving fixtures on a property within a transit priority area.	**No**. Under Alternative 2, a reduced project would be constructed on the Project site. Because of the significantly reduced size of the hotel, and other reduced or eliminated amenities including the substantially reduced aquatic facilities compared to the proposed Project, the new hotel constructed on the Project site would be a limited-service hotel and would not be considered a destination hotel that incorporates sustainability features for a property within a transit priority area.
Provide for enhanced overnight guest experiences with themed amenities attractive to families and other visitors who will use the project as a tourist destination location in and of itself.	**No**. Under Alternative 2, a reduced project would be constructed on the Project site. Because of the significantly reduced size of the hotel and the substantial reduction or elimination of guest amenities, the reduced project alternative would be a limited-service hotel and would not offer the types of themed amenities for overnight guests required to qualify as a tourist destination in and of itself.
Develop a project that allows for efficient operations and logistics.	**Partially**. Under Alternative 2, a reduced project would be constructed on the Project site. The development of a brand new hotel of the size of the reduced project alternative on such a relatively large property would be less operationally and logistically efficient compared to the Project.
Implement the project site's International West General Plan designation by including hotel, entertainment and resort elements to promote guest visits of multiple days.	**No**. Under Alternative 2, a reduced project would be developed on the Project site. While Alternative 2 would introduce a new hotel on the Project site, the entertainment and resort elements of the proposed Project would be substantially reduced or eliminated thereby making this a limited-service hotel and making it materially less likely to attract guest visits for multiple days.
Develop a destination hotel in a location with convenient access to public transit and a shuttle system that connects the project to other tourist attractions in the area including those along the Harbor Boulevard Resort corridor.	**No**. Under Alternative 2, a reduced project would be constructed on the project site. For the reasons described elsewhere in this table, the new hotel constructed on the Project site would be a limited-service hotel and would not be considered a destination hotel even though it is in a location that provides convenient access to public transit and a shuttle connecting to tourist attractions.

Table 6-5. Summary of Alternative 2 Success at Meeting Project Objectives

Project Objective	Does Alternative 2 Meet Objective?
Support increased tourism in the City while also complementing other tourist destinations in surrounding communities.	**Partially**. Under Alternative 2, a reduced project would be constructed. The new hotel would still have some potential to increase tourism in the City even though it would be a limited-service hotel, but the reduced project alternative would not serve as a tourist destination in and of itself that would complement other tourist destinations in the surrounding community because of its limited size and absence of tourist attracting amenities.
Generate a material amount of transient occupancy and property tax revenue for the City.	**Partially**. Under Alternative 2, a reduced project would be constructed. The new hotel would still have the potential to generate transient occupancy and property tax revenue in the City. However, the elimination of 425 hotel rooms and the corresponding reduction or elimination of amenities would result in substantially reduced transient occupancy and property tax revenue that would not qualify as material in nature for the City.
Generate additional construction and operational jobs to support the local and regional economy.	**Yes**. Under Alternative 2, a reduced project would be constructed. The new hotel would still have the potential to generate construction and operational jobs in the City.
Develop a facility of sufficient size and with sufficient amenities to attract a partnership with a national or international theme park franchise.	**No**. Under Alternative 2, a reduced project would be constructed on the project site. Because of the significantly reduced size of the hotel and number of hotel rooms, and other reduced or eliminated amenities including the substantially reduced aquatic features, restaurants and themed activities, the reduced project alternative would be a limited-service hotel and not have the ability to attract a partnership with a national or international theme park franchise.

6.5 Environmentally Superior Alternative

As indicated in Table 6-6, the No Project Alternative would result in the fewest environmental impacts and therefore would be considered the Environmentally Superior Alternative. However, the No Project Alternative would not meet any of the Project Objectives. Pursuant to CEQA Guidelines Section 15126.6(e)(2), if the No Project Alternative is the environmentally superior alterative, the EIR shall also identify an environmentally superior alternative among the other alternatives. As the analysis above demonstrates, Alternative 2, the reduced project alternative, would avoid or substantially reduce the potentially significant impacts of the Project. While Alternative 2 would avoid the significant and unavoidable GHG impacts of the Project and also result in less than significant VMT impacts, Alternative 2 does not meet or only potentially partially meets most of the basic Project objectives, as discussed in Section 6.4, above.

Table 6-6. Comparison of Project and Alternative

Environmental Topic	Project Impact	Alternative 1 No Project	Alternative 2 Reduced Project
Greenhouse Gas Emissions	Significant and Unavoidable (Impact GHG-1)	No Impact	Less than Significant
	Less than Significant with Mitigation (Impact GHG-2)	No Impact	Less than Significant
Vehicle Miles Traveled	Less than Significant with Mitigation	No Impact	Less than Significant

INTENTIONALLY LEFT BLANK

7 List of Preparers

7.1 City of Garden Grove

Monica Covarrubias – Senior Project Manager, Economic Development and Housing Department
Ricia R. Hager – City Attorney
Maria Parra – Planning Manager
Juan Navarro – Traffic Engineer

7.2 Dudek

Nicole Cobleigh – Senior Project Manager
Elena Nuño – Senior Air Quality Specialist
Jennifer Reed – Air Quality Services Manager
Hayley Rundle – Environmental Planner
Sabita Tewani – Senior Transportation Planner

INTENTIONALLY LEFT BLANK