

**City of Garden Grove
Focused General Plan Update
And Zoning Amendments
Final Environmental Impact Report
(State Clearinghouse # 2021060714)**

Lead Agency:

City of Garden Grove
Planning Services Division
11222 Acacia Parkway
Garden Grove, California 92840



Consultant to the City:

MIG, Inc.
1650 Spruce Street, Suite 106
Riverside, California 92507
www.migcom.com



October 29, 2021

- This document is designed for double-sided printing -

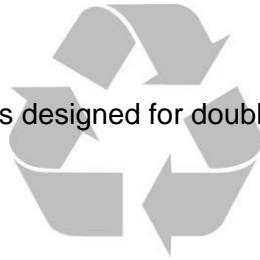


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1.0 INTRODUCTION

This Final Environmental Impact Report (FEIR) has been prepared to comply with Sections 15088 and 15089 of the State California Environmental Quality Act (CEQA) Guidelines (Guidelines). The City of Garden Grove (City) has prepared the Final EIR pursuant to the CEQA Guidelines, including Sections 15086 (Consultation Concerning Draft EIR) and 15088 (Evaluation of and Responses to Comments). As noted in Section 15089(b) of the Guidelines, the focus of a FEIR should be on responses to comments on the Draft Environmental Impact Report (DEIR). In conformance with these guidelines, the Final EIR consists of the following volumes:

- (1) The **Draft EIR** circulated for a 45-day public agency and public review and comment period commencing on August 18, 2021 and ending on October 6, 2021. A Notice of Availability was sent to neighboring cities, other government agencies and non-governmental interested parties. The City's Notification List for the DEIR is provided in Section 4.0 (Public Circulation) of this FEIR.
- (2) This **Final EIR document** includes all written comments received on the Draft EIR during the 45-day public review period, the written responses of the City to these comments, revisions to the Draft EIR in response to comments (presented in Section 3, Errata) and the public circulation record. None of the revisions to the Draft EIR represents a substantial increase in the severity of an identified significant impact or the identification of a new significant impact, mitigation, or alternative considerably different from those already considered in the Draft EIR.

Certification of this Final EIR by the Garden Grove City Council must occur prior to approval of the Focused General Plan Update and Zoning Amendments (FGPUZA).

Availability of EIR Materials

All materials related to the preparation of this EIR are available for public review on the City of Garden Grove website <http://www.ggcity.org/planning> and at the following physical location:

City of Garden Grove
Community and Economic Development Department
Planning Services Division
11222 Acacia Parkway
Garden Grove, California 92840

Summary Project Description

Provided below for ease reference is a summary of the description of the FGPUZA project. The full Project Description can be found in Chapter 3 of the Draft EIR.

Every city and county in California is required to have a general plan that functions as a comprehensive, long-range policy document. For cities, the general plan guides the physical development of the incorporated city (e.g., city limit) and any land outside city boundaries (e.g., unincorporated sphere of influence area) that has a relationship to the city's future growth and development. Although it should be noted that the City of Garden Grove does not have any unincorporated Sphere of Influence area.

The City of Garden Grove's General Plan was last comprehensively updated in 2008 and the City is proposing to amend the three Elements shown below:

- Housing
- Land Use
- Safety

The City also prepared a new Environmental Justice Element in response to recent State Legislation requiring its preparation. In addition to the General Plan update, the City proposed various amendments to Title 9 (Land Use) of the Garden Grove Municipal Code in compliance with California Government Code (CGC) Section 65300 et seq. and to make it consistent with the FGPUZA. The FGPUZA meets the requirements of CGC Article 5 (Authority for and Scope of General Plans)¹ and addresses anticipated changes to the demographic, economic and environmental conditions in Garden Grove through the year 2040.

Table 1-1 shows the existing and projected land uses expected to result from implementation of the FGPUZA.

**Table 1-1
Potential General Plan Update Growth**

Development Indicators	Existing Conditions (2020)	Future Buildout Conditions (2040)	Existing to Buildout Change (Numbers)	Existing to Buildout Change (Percentage)
Dwelling Units	48,257	68,499	20,242	41.9%
Population	174,801	238,619	63,818	36.5%
Non-Residential Building SF	30,232,500	29,718,000	(514,500)	-1.7%
Commercial	9,401,900	9,203,300	(198,600)	-2.1%
Office	1,992,800	1,941,500	(51,300)	-2.6%
Hotels/Motels SF	2,383,500	3,015,700	632,200	26.5%
	3,600 rooms	4,493 rooms	893 rooms	24.8%
Industrial	8,791,300	8,508,800	(282,500)	-3.2%
Public Facilities/Institutional	7,663,000	7,048,700	(614,300)	-8.0%
Employees	45,766	49,369	3,603	7.9%
Students	31,094	36,080	4,986	16.0%
Source: MIG, Inc. 2021 SF = square feet				

¹ CGC Article 5 requires every city and county to have a general plan that functions as a comprehensive, long-range policy document.

Intended Use of the EIR

The planning framework proposed in the General Plan Update would not result in the immediate construction of any new development nor entitlement of any new project. All new development within the City will continue to be subject to the City's permitting, approval, and public participation processes. Elected and appointed officials along with City Staff will review subsequent project applications for consistency with the General Plan, applicable Specific Plans, and the Zoning Ordinance, and will prepare appropriate environmental documentation to comply with CEQA and other applicable environmental requirements.

Pursuant to Section 15168 of the State CEQA Guidelines, this EIR is a Program EIR. The goals, policies, land use designations, implementation programs, and other substantive components of the General Plan and implementing sections of the Zoning Ordinance comprise the "program" evaluated in this Program EIR. Subsequent activities undertaken by the City and project proponents to implement the General Plan will be examined considering this Program EIR to determine the appropriate level of environmental review required under CEQA. Subsequent implementation activities may include but are not limited to the following:

- Rezoning of properties to achieve consistency with the General Plan.
- Updating and approval of Specific Plans and other development plans and planning documents.
- Approval of tentative maps, variances, conditional use permits, and other land use permits and entitlements.
- Approval of development agreements.
- Approval of facility and service master plans and financing plans.
- Approval and funding of public improvement projects.
- Approval of resource management plans.
- Issuance of permits and other approvals necessary for the implementation of the General Plan.
- Issuance of permits and other approvals necessary for public and private development projects.
- Future amendments to the City's Housing Element and other General Plan Elements.

Plan Preparation Process and Public Participation

Ensuring the focused Garden Grove General Plan Update reflects the diverse priorities and needs of the community, the General Plan Update program facilitated numerous engagement activities to gather community input. The engagement program included:

- Stakeholder Interviews and Focus Group Meetings
- Housing Element Webpage and Social Media
- Three (2) Community Surveys
- Two (2) Virtual Community Forums
- Six (6) Study Sessions

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2.0 RESPONSE TO COMMENTS

The Draft EIR was circulated for a 45-day public review and comment period beginning August 18, 2021 and ending on October 6, 2021. In compliance with CEQA, a Notice of Availability was sent to government agencies, neighboring cities, and non-governmental interested parties (CEQA Guidelines § 15087). The City's Local Agency Notification List, showing who received notice of the Draft EIR, is provided in Section 4.0 - Public Circulation - of this FEIR. Two comment letters were received from various agencies, conservation organizations, and private groups, as well as a letter from the California Office of Planning and Research (OPR) acknowledging receipt of the Draft EIR.

The correspondences listed in Table 2-1 (DEIR Comments) were submitted to the City of Garden Grove concerning the DEIR. A copy of each comment letter, followed by the City's written responses to those comments, follow.

**Table 2-1
DEIR Comments**

ID	Agency/Organization/Individual	Date
State Agencies		
A	California Office of Planning & Research, State Clearinghouse (acknowledge receipt of the DEIR)	8/18/6/21
B	California Department of Transportation (Caltrans)	10/5/21
County Agencies/Organizations		
	None	
Regional Organizations		
C	Mitchell M. Tsai, Attorney at Law, on behalf of the Southwest Regional Council of Carpenters (SRCC).	10/6/21
City Organizations		
	None	
Private Individuals/Companies		
	None	

COMMENT LETTER A – CALIFORNIA STATE CLEARINGHOUSE

City of Garden Grove Focused General Plan Update and Zoning Amendments (FGPUZA)

Summary

SCH Number	2021060714
Lead Agency	City of Garden Grove
Document Title	City of Garden Grove Focused General Plan Update and Zoning Amendments (FGPUZA)
Document Type	EIR - Draft EIR
Received	8/18/2021
Present Land Use	Residential, Commercial, Industrial, Office, Open Space, and Mixed-Use
Document Description	The City of Garden Grove is proposing to amend the Housing, Land Use, and Safety Element of the Garden Grove General Plan. The City will also prepare an Environmental Justice Element as well as various amendments to Title 9 (Land Use) of the Garden Grove Municipal Code and to bring the Municipal Code in compliance with the Focused General Plan Update.

Contact Information

Name	Chris Chung
Agency Name	City of Garden Grove Planning Department
Contact Types	Lead/Public Agency
Address	11222 Acacia Parkway Garden Grove, CA 92840
Phone	(714) 741-5314
Email	chrisc@ggcity.org

Name	Bob Prasse
Agency Name	MIG
Contact Types	Consulting Firm
Address	1650 Spruce Street, Suite 106 Riverside, CA 92507-7402
Phone	(951) 787-9222 ext. 802

A1

Email

bprasse@migcom.com

Location

Cities	Garden Grove
Counties	Orange
Zip	92840
State Highways	California
Schools	Garden Grove Unified School District

Notice of Completion

Review Period Start	8/18/2021
Review Period End	10/6/2021
Development Types	Residential (Garden Grove Focused General Plan Update and Zoning Amendments) (Units 20000, Acres 11464)
Local Actions	General Plan Update
Project Issues	Air Quality, Greenhouse Gas Emissions, Transportation, Utilities/Service Systems
Reviewing Agencies	California Air Resources Board (ARB), California Department of Conservation (DOC), California Department of Corrections and Rehabilitation (CDCR), California Department of Fish and Wildlife, South Coast Region 5 (CDFW), California Department of Forestry and Fire Protection (CAL FIRE), California Department of Housing and Community Development (HCD), California Department of Parks and Recreation, California Department of Transportation, District 12 (DOT), California Department of Transportation, Division of Aeronautics (DOT), California Department of Transportation, Division of Transportation Planning (DOT), California Department of Water Resources (DWR), California Energy Commission, California Governor's Office of Emergency Services (OES), California Highway Patrol (CHP), California Native American Heritage Commission (NAHC), California Natural Resources Agency, California Public Utilities Commission (CPUC), California Regional Water Quality Control Board, Santa Ana Region 8 (RWQCB), California State Lands Commission (SLC), Department of Toxic Substances Control, Office of Historic Preservation, State Water Resources Control Board, Division of Water Quality

A1

Attachments

Draft Environmental Document [Draft IS, NOI_NOA_Public notices, OPR Summary Form, Appx,]

[Garden Grove_DEIR **PDF** 18392 K](#)
[Garden Grove_DEIR_APPENDICES **PDF** 16123 K](#)
[NOA **PDF** 186 K](#)
[Summary_Form_for_Document_Submittal **PDF** 599 K](#)

Notice of Completion [NOC] Transmittal form

[NOC Final **PDF** 236 K](#)

Disclaimer: The Governor’s Office of Planning and Research (OPR) accepts no responsibility for the content or accessibility of these documents. To obtain an attachment in a different format, please contact the lead agency at the contact information listed above. You may also contact the OPR via email at state.clearinghouse@opr.ca.gov or via phone at [\(916\) 445-0613](tel:9164450613). For more information, please visit [OPR’s Accessibility Site](#).

ID	Response to Comment Letter A - State Clearinghouse
A-1	The City acknowledges the State Clearinghouse's receipt of the Draft EIR for distribution to state agencies. The City also acknowledges the 45-day public review period ran from August 18, 2021, to October 6, 2021, consistent with the City's local distribution and newspaper notification dates. Thank you for your assistance in this regard.

**COMMENT LETTER B – CALIFORNIA DEPARTMENT OF TRANSPORTATION
(CALTRANS)**

DEPARTMENT OF TRANSPORTATION

DISTRICT 12

1750 EAST 4TH STREET, SUITE 100

SANTA ANA, CA 92705

PHONE (657) 328-6000

FAX (657) 328-6522

TTY 711

www.dot.ca.gov/caltrans-near-me/district12

Making Conservation
a California Way of Life.

October 5, 2021

MR. Chris Chung
City of Garden Grove
11222 Acacia Parkway
Garden Grove, CA 92840

File: IGR/CEQA
SCH#: 2021060714
IGR LOG #2021-01764
Citywide

Dear Mr. Chung

Thank you for including the California Department of Transportation (Caltrans) in the review of the Draft Environmental Document for the City of Garden Grove Focused General Plan Update and Zoning Amendments. The City of Garden Grove is proposing to amend the Housing, Land Use, and Safety Element to the Garden Grove General Plan as well as preparing an Environmental Justice Element to the General Plan. The is also proposing multiple amendments to Title 9 (Land Use) of the Garden Grove Municipal Code to bring the Municipal Code in compliance with the Amended General Plan.

The mission of Caltrans is to provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability. Caltrans is a responsible agency on this project and has the following comments:

Transportation Planning

1. Caltrans supports the development of Complete Streets that include high-quality pedestrian, bicycle, and transit facilities that are safe and comfortable for users of all ages and abilities. Complete Streets promote regional connectivity, improve air quality and public health, reduce congestion, promote improved first-/last-mile connections, and increase safety for all modes of transportation. Continue to promote the development of Complete Streets facilities in the City.
2. Please consider including a discussion on the relationship between Housing Element, Land Use Element, Safety Element and alternative modes of transportation in the Update of the Focused General. The discussion could

B1

B2

"Provide a safe and reliable transportation network that serves all people and respects the environment"

indicate how different modes of transportation can impact the Housing Element, Land Use Element, and Safety Element and how policies and updates will affect transportation facilities and land use patterns, which can potentially impact different modes of transportation (regular vehicles, trucks, transit, bike, etc...). In the long run, traffic impacts of different modes of transportation will affect how policies are developed and adjusted. In addition, new and/or old development projects should incorporate opportunities to support sustainable and multimodal transportation options including but not limited to transit, walking, biking, electric cars, and bicycles.

B2

3. Please enlarge the legend text in Exhibit 4.14-1 and 4.14-2
4. Exhibit 4.14-4 is titled as the "Master Plan of Bikeway Facilities," but it appears to show bus routes instead.

B3

Encroachment Permits

5. In the event of any activity in Caltrans right of way an Encroachment Permit will be required. All environmental concerns must be addressed. If the environmental documentation for the project does not meet Caltrans requirements, additional documentation would be required before approval of the Encroachment Permit. For application forms and specific details on Caltrans Encroachment Permits procedure, please refer to Encroachment Permits Manual. The latest edition of the Manual is available on:
<http://www.dot.ca.gov/trafficops/ep/apps.html>.

B4

Please continue to coordinate with Caltrans for any future developments that could potentially impact State transportation facilities. If you have any questions, please do not hesitate to contact Maryam Molavi, at (657) 328-6280 or Maryam.Molavi@dot.ca.gov.

B5

Sincerely,



Scott Shelley
Branch Chief, Regional-IGR-Transit Planning
District 12

ID	Response to Comment Letter B – Caltrans
B-1	<p>The commenter encourages the City to continue promoting the development of Complete Streets facilities in the City. The Circulation Element of the existing General Plan contains the following goals and policies related to developing smart and complete streets:</p> <p>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.</p> <p>Policy CIR-1.7 Continue to work with OCTA to implement and maintain the “Smart Street” corridors in the City to provide improved multi-modal traffic operations along those corridors.</p> <p>Goal CIR-3 Minimized intrusion of commuter traffic on local streets through residential neighborhoods.</p> <p>Policy CIR-3.1 Conduct neighborhood circulation studies to determine the nature and extent of actual and perceived traffic through these areas.</p> <p>Policy CIR-3.2 Create disincentives for traffic traveling through neighborhoods, where feasible.</p> <p>Policy CIR-3.3 Review new development or redevelopment projects adjacent to established residential neighborhoods for potential traffic intrusion impacts. The review should recommend methods, such as but not limited to 1) expanding parkways to reduce the roadway width, 2) limiting the number of ingress/egress locations on-site, 3) traffic circles, 4) diverters, or speed humps, 5) curb extensions, 6) entrance treatments, or other effective traffic management techniques that reduce or eliminate the traffic intrusion impacts.</p> <p>Policy CIR-3.4 Prioritize circulation improvements that enhance through traffic flow on Major, Modified Major, Primary, and Secondary Arterials that provide parallel routes to residential streets, in order to reduce through traffic during peak commute periods.</p> <p>Policy CIR-3.5 Requires new developments to implement access and traffic management plans that will reduce the potential for neighborhood traffic intrusion through factors such as driveway location, turn restrictions, shuttle bus operations, and/or travel demand strategies.</p> <p>Goal CIR-4 A reduction in vehicle miles traveled in order to create a more efficient urban form.</p> <p>Policy CIR-4.2 Strive to reduce the number of miles traveled by residents to their places of employment.</p> <p>Policy CIR-4.3 Ensure the reduction in vehicle miles traveled through the approval of mixed-use development proposals.</p>

ID	Response to Comment Letter B – Caltrans
	<p>Goal CIR-5 Increased awareness and use of alternate forms of transportation generated in, and traveling through, the City of Garden Grove.</p> <p>Policy CIR-5.1 Promote the use of public transit.</p> <p>Policy CIR-5.2 Continue to work with OCTA to implement and maintain the “Smart Street” corridors in the City to provide improved multi-modal traffic operations along those corridors.</p> <p>Policy CIR-5.3 Provide appropriate bicycle access throughout the City of Garden Grove.</p> <p>Policy CIR-5.4 Provide appropriate pedestrian access throughout the City of Garden Grove.</p> <p>Policy CIR-5.5 Continue to implement the provisions of the Transportation Demand Ordinance.</p> <p>Goal CIR-6 A safe, appealing, and comprehensive bicycle network provides additional recreational opportunities for Garden Grove residents and employees.</p> <p>Policy CIR-6.1 Continue to implement an updated Master Plan of Bikeways and its amendments.</p> <p>Policy CIR-6.2 Continue to maintain roadways and remove barriers on streets with bikeway facilities.</p> <p>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.</p> <p>Policy CIR-6.4 Continue to pursue and monitor funding sources for bikeway facilities.</p> <p>Policy CIR-6.5 Sponsor bicycle safety and education programs.</p> <p>Goal CIR-13 Use of the OCTA right-of-way for alternative transportation systems.</p> <p>Policy CIR-13.1 Coordinate with the OCTA to facilitate the potential development of an alternative transportation system along the OCTA right-of-way. The City shall support such a use while recognizing that any impacts to the community must be appropriately mitigated.</p> <p>In these many ways, the City will be encouraging smart and complete streets in the future to the degree practical and possible within the City given its largely built-out condition. Please also note that this project (FGPUZA) does not include any amendments to the City’s Circulation Element; the goals and policies listed above are part of the existing General Plan.</p>

ID	Response to Comment Letter B – Caltrans
B-2	<p>The commenter asked for a discussion on the relationship between the Housing Element, Land Use Element, Safety Element, and alternative modes of transportation. The following language or equivalent will be added to the Land Use Element of the General Plan:</p> <p><i>Transportation and multi-modal facilities play a critical role to ensure that users of all ages and abilities can access their destinations in a safe and efficient manner. As such, the transportation element, safety element, and land use element are all connected to each other; as land use develops, the mobility network provides the linkage between the land uses and their users.</i></p> <p>This comment was regarding the General Plan and not specifically about the EIR. Therefore, no changes to the EIR will be reflected in FEIR Section 3, Errata, in this regard.</p>
B-3	<p>The two of the identified exhibits (4.14-1 and 4.14-4) will be corrected as shown in FEIR Section 3, Errata. Exhibit 4.14-2 which addresses existing truck routes has been deleted from the FEIR because its is inaccurate. A written list of the correct truck routes has also been provided in the Errata (see Section 3).</p>
B-4	<p>Private applicants or the City as appropriate will obtain encroachment permits from Caltrans as necessary for construction activities within the state freeway or highway right-of-way.</p>
B-5	<p>The City and private developers will coordinate with Caltrans for future development or improvements that could potentially impact State transportation facilities.</p>

COMMENT LETTER C – SOUTHWEST REGIONAL CARPENTERS UNION

P: (626) 381-9248
F: (626) 389-5414
E: info@mitchtsailaw.com



Mitchell M. Tsai
Attorney At Law

139 South Hudson Avenue
Suite 200
Pasadena, California 91101

VIA E-MAIL

October 6, 2021

Chris Chung
Urban Planner
City of Garden Grove
11222 Acacia Parkway
Garden Grove, CA 92840
Em: chrisc@ggcity.org

RE: City of Garden Grove Focused General Plan Update

Dear Chris Chung,

On behalf of the Southwest Regional Council of Carpenters (“**Commenter**” or “**Southwest Carpenters**”), my Office is submitting these comments on the City of Garden Grove’s (“**City**” or “**Lead Agency**”) Draft Environmental Impact Report for its Focused General Plan Update (“**Project**”).

The Southwest Carpenters is a labor union representing more than 50,000 union carpenters in six states and has a strong interest in well ordered land use planning and addressing the environmental impacts of development projects.

Individual members of the Southwest Carpenters live, work and recreate in the City and surrounding communities and would be directly affected by the Project’s environmental impacts.

Commenters expressly reserves the right to supplement these comments at or prior to hearings on the Project, and at any later hearings and proceedings related to this Project. Cal. Gov. Code § 65009(b); Cal. Pub. Res. Code § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal. App. 4th 1184, 1199-1203; see *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal. App. 4th 1109, 1121.

Commenters expressly reserves the right to supplement these comments at or prior to hearings on the Project, and at any later hearings and proceedings related to this Project. Cal. Gov. Code § 65009(b); Cal. Pub. Res. Code § 21177(a); *Bakersfield Citizens*

C1

C2

for Local Control v. Bakersfield (2004) 124 Cal. App. 4th 1184, 1199-1203; see *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal. App. 4th 1109, 1121.

C2

Commenters incorporates by reference all comments raising issues regarding the EIR submitted prior to certification of the EIR for the Project. *Citizens for Clean Energy v City of Woodland* (2014) 225 Cal. App. 4th 173, 191 (finding that any party who has objected to the Project’s environmental documentation may assert any issue timely raised by other parties).

C3

Moreover, Commenter requests that the Lead Agency provide notice for any and all notices referring or related to the Project issued under the California Environmental Quality Act (“CEQA”), Cal Public Resources Code (“PRC”) § 21000 *et seq*, and the California Planning and Zoning Law (“**Planning and Zoning Law**”), Cal. Gov’t Code §§ 65000–65010. California Public Resources Code Sections 21092.2, and 21167(f) and Government Code Section 65092 require agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency’s governing body.

C4

The City should require the City provide additional community benefits such as requiring local hire and use of a skilled and trained workforce to build the Project. The City should require the use of workers who have graduated from a Joint Labor Management apprenticeship training program approved by the State of California, or have at least as many hours of on-the-job experience in the applicable craft which would be required to graduate from such a state approved apprenticeship training program or who are registered apprentices in an apprenticeship training program approved by the State of California.

Community benefits such as local hire and skilled and trained workforce requirements can also be helpful to reduce environmental impacts and improve the positive economic impact of the Project. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of the Project Site can reduce the length of vendor trips, reduce greenhouse gas emissions and providing localized economic benefits. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of the Project Site can reduce the length of vendor trips, reduce greenhouse gas emissions and providing localized economic benefits. As environmental consultants Matt Hagemann and Paul E. Rosenfeld note:

C5

[A]ny local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling.

Skilled and trained workforce requirements promote the development of skilled trades that yield sustainable economic development. As the California Workforce Development Board and the UC Berkeley Center for Labor Research and Education concluded:

. . . labor should be considered an investment rather than a cost – and investments in growing, diversifying, and upskilling California’s workforce can positively affect returns on climate mitigation efforts. In other words, well trained workers are key to delivering emissions reductions and moving California closer to its climate targets.¹

Local skilled and trained workforce requirements and policies have significant environmental benefits since they improve an area’s jobs-housing balance, decreasing the amount of and length of job commutes and their associated greenhouse gas emissions. Recently, on May 7, 2021, the South Coast Air Quality Management District found that that the “[u]se of a local state-certified apprenticeship program or a skilled and trained workforce with a local hire component” can result in air pollutant reductions.²

Cities are increasingly adopting local skilled and trained workforce policies and requirements into general plans and municipal codes. For example, the City of Hayward 2040 General Plan requires the City to “promote local hiring . . . to

¹ California Workforce Development Board (2020) Putting California on the High Road: A Jobs and Climate Action Plan for 2030 at p. ii, *available at* <https://laborcenter.berkeley.edu/wp-content/uploads/2020/09/Putting-California-on-the-High-Road.pdf>

² South Coast Air Quality Management District (May 7, 2021) Certify Final Environmental Assessment and Adopt Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions Program, and Proposed Rule 316 – Fees for Rule 2305, Submit Rule 2305 for Inclusion Into the SIP, and Approve Supporting Budget Actions, *available at* <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=10>

help achieve a more positive jobs-housing balance, and reduce regional commuting, gas consumption, and greenhouse gas emissions.”³

In fact, the City of Hayward has gone as far as to adopt a Skilled Labor Force policy into its Downtown Specific Plan and municipal code, requiring developments in its Downtown area to requiring that the City “[c]ontribute to the stabilization of regional construction markets by spurring applicants of housing and nonresidential developments to require contractors to utilize apprentices from state-approved, joint labor-management training programs, . . .”⁴ In addition, the City of Hayward requires all projects 30,000 square feet or larger to “utilize apprentices from state-approved, joint labor-management training programs.”⁵

Locating jobs closer to residential areas can have significant environmental benefits. As the California Planning Roundtable noted in 2008:

People who live and work in the same jurisdiction would be more likely to take transit, walk, or bicycle to work than residents of less balanced communities and their vehicle trips would be shorter. Benefits would include potential reductions in both vehicle miles traveled and vehicle hours traveled.⁶

In addition, local hire mandates as well as skill training are critical facets of a strategy to reduce vehicle miles traveled. As planning experts Robert Cervero and Michael Duncan noted, simply placing jobs near housing stock is insufficient to achieve VMT reductions since the skill requirements of available local jobs must be matched to those held by local residents.⁷ Some municipalities have tied local hire and skilled and

³ City of Hayward (2014) Hayward 2040 General Plan Policy Document at p. 3-99, *available at* https://www.hayward-ca.gov/sites/default/files/documents/General_Plan_FINAL.pdf.

⁴ City of Hayward (2019) Hayward Downtown Specific Plan at p. 5-24, *available at* <https://www.hayward-ca.gov/sites/default/files/Hayward%20Downtown%20Specific%20Plan.pdf>.

⁵ City of Hayward Municipal Code, Chapter 10, § 28.5.3.020(C).

⁶ California Planning Roundtable (2008) Deconstructing Jobs-Housing Balance at p. 6, *available at* <https://cproundtable.org/static/media/uploads/publications/cpr-jobs-housing.pdf>.

⁷ Cervero, Robert and Duncan, Michael (2006) Which Reduces Vehicle Travel More: Jobs-Housing Balance or Retail-Housing Mixing? *Journal of the American Planning Association* 72 (4), 475-490, 482, *available at* <http://reconnectingamerica.org/assets/Uploads/UTCT-825.pdf>.

trained workforce policies to local development permits to address transportation issues. As Cervero and Duncan note:

In nearly built-out Berkeley, CA, the approach to balancing jobs and housing is to create local jobs rather than to develop new housing.” The city’s First Source program encourages businesses to hire local residents, especially for entry- and intermediate-level jobs, and sponsors vocational training to ensure residents are employment-ready. While the program is voluntary, some 300 businesses have used it to date, placing more than 3,000 city residents in local jobs since it was launched in 1986. When needed, these carrots are matched by sticks, since the city is not shy about negotiating corporate participation in First Source as a condition of approval for development permits.

C5

The City should consider utilizing skilled and trained workforce policies and requirements to benefit the local area economically and mitigate greenhouse gas, air quality and transportation impacts.

I. THE PROJECT FAILS TO PROVIDE THE INFORMATION AND ANALYSES REQUIRED OF ALL HOUSING ELEMENTS

A. Background Concerning Housing Elements

Housing Elements of General Plans are the planning tools through which local governments ensure they make "adequate provision for the existing and projected housing needs" as determined through the share of the Regional Housing Needs Allocation ("RHNA") process. *See* Gov. Code § 65580(d). As specified in Gov. Code § 65580 et seq., Housing Elements must include particular information and analyses related to existing and projected housing needs, constraints relative to meeting those needs, and the local government’s specific plans to help fulfill those needs. Housing Elements that fail to provide required information and analyses may be deemed by the state or courts to be out of compliance with the law and the local government may be subject to substantial consequences. *See* Gov. Code §§ 65754, 65754.5, and 65755.

C6

B. The City’s Housing Element Fails to Provide Required Information and Analyses

The City’s Housing Element update is missing critically important information and analyses required by law. Those deficiencies include:

- The failure to describe diligent efforts to include all economic segments of the community in the development and update of the housing element and a summary of the public input received and a description of how it will be considered and incorporated into the housing element, Gov. Code, § 65583(c)(8);
- Failure to report on and analyze implementation of the 5th Cycle Housing Element's programs, Gov. Code, § 65588(a), (b);
- Failure to evaluate employment trends, to quantify the need for housing affordable to extremely low-income households, and to analyze of the housing characteristics, Gov. Code, § 65583(a);
- Inadequate analysis of governmental and non-governmental constraints on housing development, such as development fees, local permitting time, and land use controls, Gov. Code, § 65583(a)(5);
- Inadequate identification and analysis of the special housing needs in the City, including the housing needs of people with disabilities and large families, Gov. Code, § 65583(a)(7);
- The absence of a site-specific inventory of land “suitable for residential development” and be available for housing development within the planning period to accommodate the City's RHNA, Gov. Code, § 65583(a)(3), 65583.2;
- Inadequate programs to remove constraints to the development of housing for lower-income households and people with disabilities, Gov. Code, § 65583(c);
- Absence of a program to make sites available to accommodate the RHNA during the planning period, Gov. Code, § 65583(c)(1);
- Failure to identify the agencies and officials responsible for the implementation of the various program actions, Gov. Code, § 65583(c)(8).

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- Failure to demonstrate that manufactured housing is permitted in the same manner and in the same zones as conventionally constructed housing, Gov. Code, § 65582.3;
- Failure to identify a zone or zones where emergency shelters are allowed as a permitted use without discretionary review, Gov. Code § 65583(a)(4)(A);
- Lack of actions to promote fair housing and to affirmatively further fair housing, Gov. Code, § 65583(c)(5); and
- Absence of quantified objectives that estimate by income level the number of units that can be constructed, rehabilitated, and conserved over the planning period, Gov. Code, § 65583(b).

These deficiencies in the City’s Housing Element must be addressed to fulfill the City’s obligations and avoid noncompliance with the housing element law.

- i. *The Proposed Housing Element Fails to Include an Adequate Program to Affirmatively Further Fair Housing.*

For housing elements updated after January 1, 2021, the program to affirmatively further fair housing must include all of the following pursuant to Gov. Code § 65583(b)(10)(A)(i)–(v):

- A summary of fair housing issues in the jurisdiction and an assessment of the jurisdiction's fair housing enforcement and fair housing outreach capacity;
- An analysis of available federal, state, and local data and knowledge to identify integration and segregation patterns and trends, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs within the jurisdiction, including displacement risk;
- An assessment of the contributing factors for the fair housing issues identified under the foregoing analysis;
- An identification of the jurisdiction's fair housing priorities and goals, giving highest priority to those factors identified in the foregoing assessment that limit or deny fair housing choice or

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access to opportunity, or negatively impact fair housing or civil rights compliance, and identifying the metrics and milestones for determining what fair housing results will be achieved; and

- Strategies and actions to implement those priorities and goals, which may include (but are not limited to) enhancing mobility strategies and encouraging development of new affordable housing in areas of opportunity, as well as place-based strategies to encourage community revitalization, including preservation of existing affordable housing, and protecting existing residents from displacement.

For purposes of Gov. Code § 65584(d)(5), "affirmatively furthering fair housing" (AFFH) means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. Gov. Code § 65584(e).

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Here, the City has not neither characterized AFFH issues, or developed or incorporated substantive programs to address AFFH issues in the Draft HEU. HCD's Guidance is clear that specific goals and actions are required, such as:

- Enhancing mobility strategies and promoting inclusion for protected classes;
- Encouraging development of new affordable housing in high-resource areas;
- Implementing place-based strategies to encourage community revitalization, including preservation of existing affordable housing; and
- Protecting existing residents from displacement.⁸

⁸ *Id.* at 13.

The Draft HEU should be revised to implement specific goals and policies that address the proactive mandates of the AFFH statute.

- ii. *The Proposed Housing Element Includes an Inadequate and Flawed Inventory of Sites Available for Housing Development.*

Commenters are particularly concerned about a number of issues with the Draft HEU relating to its sites inventory, including:

- A failure to assess in the sites inventory any parcel's *likelihood* of development to satisfy RHNA requirements; and
- Vacant sites are identified to satisfy RHNA requirements which may not be suitable for development.

Planning's process for selecting sites and assessing their capacity seemingly fails to account for any parcel's *likelihood of development*, and its draft site inventory includes many parcels where housing development may or could be extremely unlikely. The Draft HEU includes a sites inventory table in the appendices.

First, while the inventory may or may not account for all or most APNs with a preliminary analysis of capacity, it does not analyze the likelihood that any of these APNs would be developed to increase the number of available housing units in the City. The inventory also does not analyze whether any of the available sites would improve or exacerbate fair housing conditions in the City.

The Draft HEU should also include information about the methodology utilized to analyze or determine site capacity and any site-specific constraints that might apply to particular APNs. All of this is required pursuant to Government Code, section 65583, subdivision (a)(3), and section 65583.1.

An accurate assessment of the site inventory's housing capacity is necessary in order for the housing element to achieve sufficient housing production. The site capacity estimate should account for the following two factors:

1. What is the likelihood that the site will be developed during the planning period?
2. If the site were to be developed during the planning period, how many net new units of housing are likely to be built on it?

The portion of the jurisdiction's RHNA target that a site will realistically accommodate during the planning period is:

C6

*(likelihood of development) × (net new units if developed) = realistic capacity*⁹.

Recommendations:

1. Provide a quantitative estimate of parcels' development probabilities, and incorporate this factor into the estimate of sites' realistic capacity.
2. Report the proportion of sites in the previous housing element's inventory that were developed during the planning period.
3. Remove parcels from the site inventory where redevelopment is unlikely to occur during the 6th Cycle.
4. Commit to a mid-cycle review to verify Planning's assumptions about development probabilities. If it turns out that sites within a tier, or category, were developed at a lower-than-expected rate during the first half of the cycle, then the city should rezone for additional capacity or make other appropriate adjustments for the second half of the planning period.
5. Identify sufficient sites to provide a 15-30% No Net.

Secondly, it appears that Planning may have counted many vacant sites towards specific income RHNA targets, despite their potential unsuitability for housing production. Planning must not include "vacant" sites that have no realistic chance of being developed. As with the Suitable Sites inventory, these sites must be discounted by their likelihood of development. Since the likelihood of development for some of these sites could effectively be zero, they should be excluded from Planning's list of vacant sites after further review.

Recommendations:

1. Exclude all vacant parcels that are unsuitable for residential development due to size, shape, gradient, location, and lack of street access.

⁹ See HCD June 10, 2020 Memo re Housing Element Site Inventory Guidebook Gov. Code Sec. 65583.2, available at https://www.hcd.ca.gov/community-development/housing-element/docs/sites_inventory_memo_final06102020.pdf.

2. Provide a quantitative estimate of parcels' development probabilities, and incorporate this factor into the estimate of sites' realistic capacity.

Lastly, Planning should not rely on an overly optimistic forecast of future ADU production which is unlikely to be achieved. There is no evidence that ADU production in the City will appreciably add to the housing stock. There is a difference between an ADU that is put on the rental market and one that is merely used internally by the owner.

The City should also not rely on SCAG's affordability assumptions for ADU units to meet any conclusion that some ADUs will be allocated to moderate, low and very-low income residents. SCAG's affordability analysis calculations rely heavily upon evidence from outside jurisdictions because SCAG admits there is a lack of data available for the Southern California ADU market.¹⁰ Perhaps more importantly, the SCAG study also admits that many ADUs are "non-rented" ADUs and there is *no reliable data* on how many ADUs are actually put on the rental market versus used internally by the owner, e.g., for family member use.¹¹ In the Bay Area, it is estimated that approximately half of ADUs are non-rented.¹² Thus, the City cannot make any assumptions that newly permitted ADUs, even if they were produced, will be available to meet the City's RHNA obligations.

iii. The City Should Consider Incorporating Programs and Policies Designed to Achieve the Additional Production of Housing Units Under the Sixth Cycle RHNA Requirements.

The Draft HEU should undertake a schedule of actions that will achieve SCAG's Sixth Cycle RHNA allocation for the City. However, the City is not planning to implement any programs, plans, policies, or the like that will come anywhere close to achieving that mandate. The Draft HEU's Housing Plan only contains vague goals without any specific plan or mandates to implement the necessary changes to accelerate housing development.

¹⁰ SCAG ADU Affordability Analysis, available at https://scag.ca.gov/sites/main/files/file-attachments/adu_affordability_analysis_120120v2.pdf?1606868527.

¹¹ *Id.* at 10.

¹² *Id.*

HCD has suggested that effective programs contain the following items¹³:

- Definite time frames for implementation (e.g. annually during the planning period, upon adoption of general plan amendment, by June 2020, etc.).
- Identification of agencies and officials responsible for implementation (e.g., planning department, county community development department, city building official, housing manager, public housing authority, etc.).
- Description of the local government’s specific role in program implementation (e.g. a description of how the city will market the availability of rehabilitation funds).
- Description of the specific action steps to implement the program.
- Proposed measurable outcomes (e.g., the number of units created, completion of a study, development of a homeless shelter, initiation of a rezone program, preservation of at-risk units, etc.).
- Demonstration of a firm commitment to implement the program (e.g., the city will apply for HOME funds by June 2009).
- Identification of specific funding sources, where appropriate (e.g., dollar amounts of annual funding entitlements or allocations — Community Development Block Grants; Emergency Solutions Grants; Housing Opportunities for Persons with AIDS; continuum of care; redevelopment successor agency’s low- to moderate-income housing funds; bond proceeds; tax credit allocations; and other federal, state and local resources).

The Draft HEU should be amended to consider more effective and definite plans and policies to achieve the City’s 6th Cycle RHNA obligations.

¹³ See <https://www.hcd.ca.gov/community-development/building-blocks/program-requirements/program-overview.shtml>.

III. CONCLUSION

Commenters request that the City address all the aforementioned issues raised.

Please contact my Office if you have any questions or concerns.

Sincerely,



Mitchell M. Tsai

Attorneys for Southwest Regional
Council of Carpenters

Attached:

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling (Exhibit A);

Air Quality and GHG Expert Paul Rosenfeld CV (Exhibit B); and

Air Quality and GHG Expert Matt Hagemann CV (Exhibit C).

ID	Response to Comment Letter C – Southwest Regional Carpenters Union
C-1	The City understands the nature of the Southwest Regional Council of Carpenters (SRCC) and the role it plays in the CEQA process. As indicated in the comment, the City and SRCC are subject to the applicable requirements of CEQA.
C-2	The City acknowledges the SRCC may comment on the General Plan project and its EIR under the California Government Code and California Public Resources Code, including the specific provisions of CEQA.
C-3	The City acknowledges the SRCC may comment on issues raised by other commenters during the EIR process as cited.
C-4	The City acknowledges the rights of the SRCC under state law regarding public notices and noticing for the General Plan and its EIR.
C-5	<p>(SRCC Letter pages 2 through 5 of 13)</p> <p>The SRCC comment letter suggests “the City should require the Applicant provide additional community benefits such as require local hire and use of a skilled and trained workforce to build the Project.” As pointed out in the Draft EIR, the General Plan Update is the subject of the EIR. No specific development project or private applicant is involved. Therefore, the SRCC comments are not directly applicable to this EIR. Nonetheless, in response to the overarching subject raised by the commenter, the City is not specifically required to incorporate a local hire policy or mandate for the following reasons discussed below. Most local agencies in the State do not impose such requirements on private development projects not involving public subsidies.</p> <p>First, with regard to using local hiring / skilled workforce during construction, the commenter cites a letter from Soil Water Air Protection Enterprise (SWAPE) that alleges generally that local hire requirements result in a decreased worker trip length from default emissions modeling assumptions and thus result in a reduction in construction-related GHG emissions, although the level of emissions reductions achieved is contingent on a project's specific location. As discussed in the Draft EIR at the top of page 4.1-29, "The proposed FGPUZA would not directly result in construction of any development or infrastructure; however, future development supported by the FGPUZA would result in short-term construction-related criteria pollutant emissions that have the potential to have an adverse effect on air quality." Impact Air-2 and Impact GHG-1 conclude that future construction activities facilitated under implementation of the proposed FGPUZA could have the potential to generate construction emissions that are more than SCAQMD construction criteria air pollutant thresholds (pg. 4.1-29). Accordingly, Mitigation Measure AQ-2A requires the preparation of a project-level construction assessment for future discretionary development projects. If construction emissions exceed SCAQMD thresholds, a project would be required to implement measures to reduce those emissions. Specific measures that may be required for future discretionary projects would be evaluated on a case-by-case basis as those projects are proposed. An applicant may elect to use local, skilled, and/or trained labor as a means of reducing construction emissions. The City notes that such action by itself would be unlikely to substantially reduce or avoid an individual project's construction emissions and would not avoid the program-level significant construction emissions impact identified in Impact AIR-2 and GHG-1. This is because, as explained on Draft EIR</p>

ID	Response to Comment Letter C – Southwest Regional Carpenters Union
	<p>page 4.1-29, fugitive dust emissions are typically greatest during grading when soil is disturbed, oxides of nitrogen (NO_x) emissions are typically greatest during periods of heavy equipment use when fuel is combusted, and reactive organic gas (ROG) emissions are typically greatest during architectural coating activities from off-gassing. Construction worker trips, therefore, are not a substantial contributor to construction emissions estimates and mitigation for this activity would not be roughly proportional to typical construction impacts as required by CEQA (PRC Section 15216.4(a)(4)(b)). In addition, for GHG emissions, the SCAQMD does not maintain a distinct annual GHG construction emissions threshold. Rather, as explained on Draft EIR page 4.6-24, the SCAQMD recommends amortizing construction emissions over a 30-year time period and adding them to a project's operational GHG emissions. In this context, construction worker GHG emissions do not substantially contribute to annual GHG emissions estimates prepared following SCAQMD methodology and, again, mitigation for this source would not be proportional to the typical construction emissions impact.</p> <p>Second, with regard to local hiring / skilled workforce to reduce emissions during operation of land uses, the commenter cites a South Coast Air Quality Management District (SCAQMD) quote and actions taken by the Cities of Hayward and Berkeley. As described throughout the Draft EIR, the Project would implement numerous mitigation measures (e.g., Mitigation Measures VMT-1, VMT-2, and VMT-3) to help reduce mobile source emissions. Mitigation Measures VMT-1 and VMT-2 would be supportive of local transit and access to transit, improve pedestrian and/or bicycle networks and facilities, increase access to common goods and services, such as groceries, schools, and daycare, and support incorporation of neighborhood electric vehicle networks. While these measures do not specifically require the use of a local/skilled/trained workforce, they would serve to help reduce mobile source emissions by providing residents and employees with additional opportunities to reduce trips / VMT and/or use cleaner modes of transit. Pursuant to the CalEEMod Users Guide, Appendix D, Table 4-2, potential emissions from vendors during project operation are estimated assuming a 6.9-mile vehicle trip, which is less than customer trips (8.4 miles per trip) and worker trips (16.6 miles per trip). Operational vendor trips, therefore, are typically a very small percentage of a project's emissions and do not substantially contribute to an impact. As a programmatic document, the EIR correctly focuses on mitigation for the mobile sources that contribute the most to air pollutant and greenhouse gas emissions. Additional mitigation is not necessary because it would not serve to reduce or avoid a significant operational impact associated with vendor trips.</p> <p>Finally, while the commenter suggests that the City (emphasis added), "... should <i>consider</i>... utilizing local, skilled, and trained workforce policies and requirements, the commenter has not identified a reason directly linked to the Draft EIR for why such a policy is necessary. Businesses and private development projects have the option of using local skilled or union labor, including for the purpose of emissions reduction, and as noted above future applicants may choose to do so.</p> <p>It is worth noting that numerous factors can come into play regarding job site choices for construction workers, including fluctuations in demand for construction by geography, match of specific construction specialties to demand for such specialties, and pre-existing business relationships between construction companies</p>

ID	Response to Comment Letter C – Southwest Regional Carpenters Union
	<p>(or individual workers) and developers. Travelling to wherever the work is, whether or not it is local, is endemic to construction-related professions.</p> <p>SWAPE MATERIALS. The entire SWAPE memorandum attached to the SRCC letter relates to Comment/Response C-5 in terms of skilled labor force and whether the City should or can require future development to use union labor. Please see Response C -5 for discussion of the information and issues presented in this letter.</p> <p>All of the SWAPE materials, including the voluminous resume information for the SWAPE researchers, are provided in FEIR Appendix A.</p>
C-6	<p>(SRCC Letter pages 5-13 of 13) All the aspects of this comment are specifically regarding the Housing Element and do not address the General Plan EIR. Therefore, they are not addressed in this Final EIR but will be addressed separately by City staff for consideration by the Planning Commission and City Council.</p>

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3.0 ERRATA

This section identifies revisions to the City of the Garden Grove Focused General Plan Update and Zoning Amendments (FGPUZA) Draft EIR to incorporate clarifications, corrections, or additions prepared in response to comments on the Draft EIR. These changes include minor errors or editorial corrections identified through subsequent review. Additions are shown in underline. Deletions are shown in ~~strike through~~. Commentary Notes are shown in *Italic type* where needed.

None of the revisions below represents a substantial increase in the severity of an identified significant impact or the identification of a new significant impact, mitigation, or alternative considerably different from those already considered in the Draft EIR.

Draft EIR Section 2, Executive Summary

During circulation of the DEIR, a discrepancy in the executive summary - Impact -TRANS-4 in the Transportation Section indicated the impact after mitigation was Significant and Unavoidable while the Executive Summary incorrectly stated the impact was Less Than Significant (LTS) – the following table excerpt shows the correction:

(page 2-22, Impact Trans-4)

Impacts	Significance Before Mitigation	Mitigation	Significance After Mitigation
<p>Impact TRANS-4-Would the project cause substantial adverse cumulative impacts with respect to transportation and traffic?</p> <p>Future development under the FGPUZA will add housing which could contribute additional traffic on local and regional networks as well as hinder compliance with the state and regional VMT reduction goals outlined in SCAG's RTP/SCS. The FGPUZA could have potentially significant VMT impacts and mitigation is required.</p>	<p>S</p> <p><u>(Significant)</u></p>	<p>See Mitigation Measures VMT-1 through VMT-3, above</p>	<p><u>LTSU</u></p> <p>(Significant and Unavoidable)</p>

Draft EIR Section 4.6 Greenhouse Gases

(Page 4.6-31, Cumulative Impacts, Mitigation Measures, middle of page, typographic error)

See Mitigation Measures AQ-2B through AQ-2E2C and GHG-1A through GHG-1D.

Draft EIR Section 4.10, Noise

(Page 4.10-31, 1st paragraph, last sentence)

It is noted the traffic noise modeling does not consider any trip reductions that may occur as a result of Mitigation Measure AQ-2E 2C (Transportation Demand Management).

(Page 4.10-40, 8th and 9th paragraphs and Page 4.10-41, 1st paragraph)

- FPGUZA EIR Mitigation Measure AQ-2E 2C requires the City to achieve a 20% reduction below standard trip generation rates for certain new projects occurring in the City (see Chapter 4.1).

Mitigation Measure AQ-2E 2C would reduce vehicle trips and lower traffic-related noise levels; however, the specific roadway segments where this mitigation would reduce vehicle trips and traffic-related noise is not known and, therefore, no noise reduction has been taken for VMT and trip reduction measures required by Mitigation Measure AQ-2E 2C.

(Page 4.10-46, 2nd paragraph, last sentence)

This is considered a cumulatively considerable contribution to a significant cumulative noise impact even with the inclusion of existing General Plan EIR mitigation (NOI-2) and FGPUZA EIR Mitigation Measure AQ-2E 2C.

(Page 4.10-46, 6th paragraph)

Mitigation Measures

See General Plan EIR Mitigation Measure NOI-2 and FGPUZA EIR Mitigation Measure AQ-2E 2C.

Draft EIR Section 4.14, Transportation

(Page 4.14-3, Exhibit 4.14-1, Existing Circulation and Master Plan of Arterial Highways)

Caltrans requested the legend be made more legible and a more current version of the exhibit has been provided – see attached modified exhibit

(Page 4.14-5, Primary Arterials, end of first paragraph)

Primary arterials in the City include the following roadways:

- Magnolia Street - Katella Avenue to Westminster Avenue
- Euclid Street - Katella Avenue to Chapman Avenue
- Euclid Street – Chapman Avenue to Hazard Avenue (six-lane section)
- Haster Street - Tiller Street to SR-22 Freeway
- Chapman Avenue - ~~Knott Avenue~~ Valley View Street to west of Beach Boulevard, west of Dale Street to Lewis Street
- Garden Grove Boulevard – Valley View Street to west of Park Vine Street
- Westminster Avenue - west of ~~Erin Street~~ Magnolia Street to eastern City limit

- Knott Avenue - Patterson Drive to Garden Grove Boulevard
- ~~Valley View Street~~

(Page 4.14-14, Exhibit 4.14-4, Master Plan of Bikeway Facilities)

Caltrans noted this was the wrong figure – see following modified exhibit

(Page 4.14-6, last paragraph) **Truck Routes**

During circulation of the DEIR, it was determined that Exhibit 4.14-2, Truck Routes, does not match the officially designated truck routes listed in Garden Grove Municipal Code Section 10.40.030, Truck Route and Large Truck Routes Established. For the purposes of the Final EIR, Exhibit 4.14-2 is hereby deleted from the Draft EIR. In addition, the following related text in the EIR is hereby modified as follows:

The City of Garden Grove has adopted a truck route system (Municipal Code 10.40 et. seq.) to provide access to those land uses requiring truck transportation, while protecting those land uses sensitive to the impacts of truck travel (i.e., noise and vibration,). The truck routes in the Planning Area are illustrated in ~~Exhibit 4.14-2 (City of Garden Grove Designated Truck Routes)~~ and designates those roadways for use by commercial vehicles exceeding a maximum gross weight of 6,000 pounds and with a maximum length from the kingpin to the rearmost axle not exceeding 38 feet (Municipal Code 10.40.030). In addition, “large truck routes” are also indicated for roadways designated for use by any commercial vehicle exceeding 38 feet in length from the kingpin to the rear-most axle.

For the FEIR, DEIR Exhibit 4.14-2, City of Garden Grove Truck Routes, is deleted from the EIR and instead the following list of truck routes shall apply.

These arterials include routes for standard and large trucks along the road segments listed below (page 4.14-9, 1st paragraph):

<u>Name of Street</u>	<u>Segment Designated as Truck Route</u>
<u>Standard Truck Routes</u>	
<u>Acacia Avenue</u>	<u>Knott Street east to Monarch Street</u>
<u>Beach Boulevard</u>	<u>Garden Grove Boulevard, south to Trask Avenue</u>
<u>Belgrave Avenue</u>	<u>Knott Street east to Industry Street</u>
<u>Bolsa Avenue</u>	<u>All portions within City</u>
<u>Brookhurst Street</u>	<u>Katella Avenue, south to Hazard Avenue</u>
<u>Cannery Street</u>	<u>Garden Grove Boulevard, south to Magnolia Street</u>
<u>Century Boulevard</u>	<u>Garden Grove Blvd. southeast to Euclid Street</u>
<u>Chapman Avenue</u>	<u>Valley View Street to Lewis Street, east to Beach Boulevard</u>
<u>Edison Way</u>	<u>Belgrave Avenue to Lampson Avenue</u>
<u>Euclid Street</u>	<u>Garden Grove Boulevard, south to Hazard Avenue</u>
<u>Fairview Street</u>	<u>Garden Grove Boulevard south to Westminster Avenue</u>
<u>Garden Grove Boulevard</u>	<u>City limits west of Beach Blvd. east to Siemon Street</u>
	<u>Knott Street, east to Beach Boulevard</u>
<u>Harbor Boulevard</u>	<u>Chapman Avenue, south to Westminster Avenue</u>
	<u>Garden Grove Boulevard, south to Westminster Avenue</u>
<u>Haster Street</u>	<u>City limits north of Chapman Ave. south to Garden Grove Blvd.</u>

<u>Name of Street</u>	<u>Segment Designated as Truck Route (cont'd)</u>
<u>Hazard Avenue</u>	<u>All portions within the City</u>
<u>Industry Street</u>	<u>Chapman Avenue south to Lampson Avenue</u>
<u>Katella Avenue</u>	<u>Dale Street, east to Euclid Street</u>
<u>Knott Street</u>	<u>City limits north of Orangewood Avenue, south to Garden Grove Boulevard</u>
<u>Lampson Avenue</u>	<u>Knott Street east to east of Western Avenue</u>
<u>Lewis Street</u>	<u>Chapman Avenue south to Garden Grove Boulevard</u>
<u>Magnolia Street</u>	<u>Katella Avenue south to Westminster Avenue</u>
<u>Monarch Street</u>	<u>Chapman Avenue south to Acacia Avenue</u>
<u>Nelson Street</u>	<u>Stanford Avenue south to Garden Grove Boulevard</u>
<u>Newhope Street</u>	<u>Garden Grove Boulevard south to Westminster Avenue</u>
<u>Nutwood Street</u>	<u>Stanford Avenue south to Garden Grove Boulevard</u>
<u>Pala Drive</u>	<u>Acacia Avenue north to terminus</u>
<u>Stanford Avenue</u>	<u>Nutwood Street east to Nelson Street</u>
<u>Trask Avenue</u>	<u>Beach Boulevard east to Fairview Street</u>
<u>Valley View Street</u>	<u>City limits north of Chapman Avenue, south to Garden Grove Freeway</u>
<u>Western Avenue</u>	<u>City limits north of Orangewood Avenue, south to Garden Grove Boulevard</u>
<u>Westminster Avenue</u>	<u>Newland Street, east to Fairview Street</u>

Large Truck Routes

<u>Beach Boulevard</u>	<u>Garden Grove Boulevard south to Trask Avenue</u>
<u>Brookhurst Street</u>	<u>Katella Avenue south to Hazard Avenue</u>
<u>Chapman Avenue</u>	<u>Valley View Street east to Beach Boulevard</u>
<u>Euclid Street</u>	<u>Garden Grove Boulevard south to Hazard Avenue</u>
<u>Garden Grove Boulevard</u>	<u>Knott Street east to Beach Boulevard</u>
<u>Harbor Boulevard</u>	<u>Garden Grove Boulevard south to Westminster Avenue</u>
<u>Katella Avenue</u>	<u>Dale Street east to Euclid Street</u>
<u>Knott Street</u>	<u>City limits north of Orangewood Avenue south to Garden Grove Boulevard</u>
<u>Valley View Street</u>	<u>City limits north of Chapman Avenue south to Garden Grove Freeway</u>
<u>Western Avenue</u>	<u>City limits north of Orangewood Avenue south to Garden Grove Boulevard</u>
<u>Western Avenue</u>	<u>Newland Street east to Fairview Street</u>

(Page 4.14-13, first three paragraphs) After circulation of the DEIR, City staff requested revisions to this section for more clarity.

Bikeways and Trails

With the increased popularity of cycling as a form of recreation and alternate transportation, the City of Garden Grove has established bicycle routes to meet the growing demand for safe places to ride bicycles. According to the City’s Active Streets Master Plan, all proposed and existing bikeway routes in Garden Grove and the surrounding area are classified in three types of facilities, as shown on **Exhibit 4.14-4** (Master Plan of Bikeway Facilities)(City of Garden Grove 2018). A Class I bicycle trail is

~~a facility that is physically separated from a roadway and designated primarily for the use of bicycles. A Class II bicycle lane facility is a facility featuring a striped lane on the paved area of a road for preferential use by bicycles. A Class III bicycle route is typically identified only by green and white “Bike Route” guide signage ~~only~~.~~








~~Several Class II bikeways are being developed in the City. The City is working on a Bicycle Corridor Improvement Program (BCIP). The BCIP which includes creating new Class II and Class IV bike lanes through road re-balancing, striping buffers on existing lanes, striping bike lane network gaps, improving and creating bicycle routes, and providing way finding signage.~~

Located along portions of Lampson and Trask Avenues and Ward and 9th Streets, Class II facilities total 22.75 miles. These Class II bicycle lane segments are located along the edge of the paved area outside the motor vehicle travel lanes. However, if sufficient pavement exists, the bicycle lane will be located between the parking lane and the outside motor vehicle travel lane. The three segments of bicycle routes in Garden Grove are characterized as bicycle facilities with typical widths of four feet (striping to curb), and widths of 12 feet (striping to curb) where on-street parking is permitted. A Class I bikeway is located along the Pacific Electric Right-of-Way (PE ROW) which begins at Nelson Street between Garden Grove Boulevard and Stanford Avenue and extends approximately one (1) mile west and ends at Brookhurst Street. The trail includes a 12-foot wide bike path and an 8-foot wide pedestrian walkway.

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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)

NOT TO SCALE



SOURCE: ITERIS, May 2008.

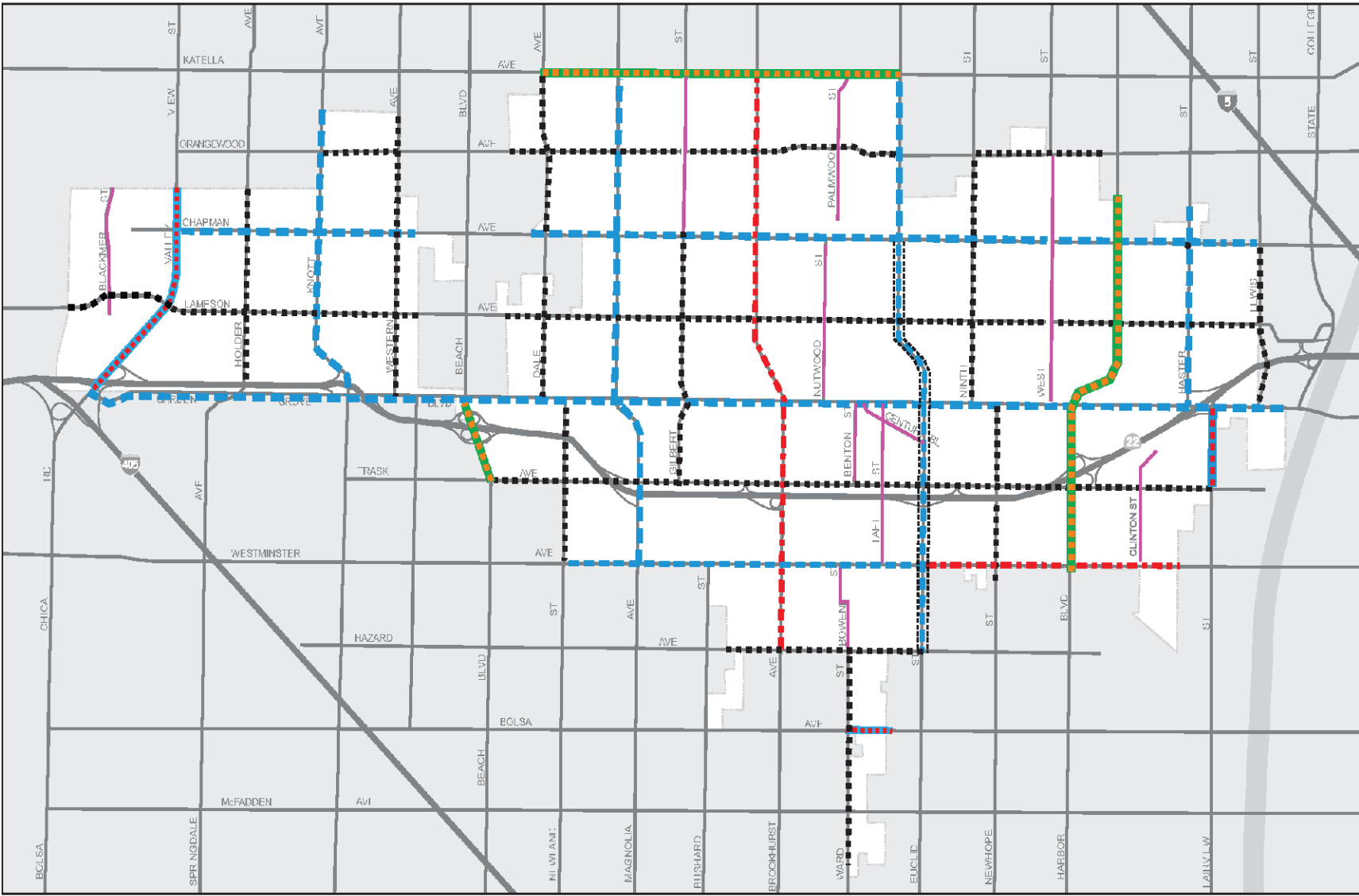


Exhibit 4.14-1 Existing Circulation System & Master Plan of Arterial Highways (MPAH)

Focused General Plan Update and Zoning Amendments
Garden Grove, California

<http://www.migcom.com> • 951-787-9222






LEGEND

City of Garden Grove

Existing	Proposed	Class I Bike Trail (Off Street Trail)
		Class II Bike Lanes (On-Street Striped Lanes)
		Class III Bike Route (On-Street Signed Route)

County of Orange and Adjacent Cities

Existing	Proposed	Class I Bike Trail (Off Street Trail)
		Class II Bike Lanes (On-Street Striped Lanes)
		Class III Bike Route (On-Street Signed Route)

NOT TO SCALE



SOURCE: ITERIS, May 2008

Exhibit 4.14-4 Master Plan of Bikeway Facilities

Focused General Plan Update and Zoning Amendments
Garden Grove, California



4.0 PUBLIC CIRCULATION

Availability and Distribution

The Notice of Preparation (NOP) was submitted on June 29, 2021, to the State Clearinghouse for distribution to State agencies on the standard notification list maintained by the City of Whittier Community Development Department. The NOP was circulated for a 30-day public review period from June 30, 2021 to July 30, 2021. The NOP was electronically filed with the State Clearinghouse on June 29, 2021, and was available on the City's website during the entire NOP public review period.

A virtual Scoping Meeting was held on July 14, 2021, with the City Planning Commission for public agencies and the public to ask questions about the EIR and provide input as to important issues that should be addressed in the EIR.

The Notice of Availability (NOA) for the Draft EIR was distributed to all agencies and other entities on the standard notification list via certified mail (see below) and was posted to the Orange County Recorder's Office and published in the Orange County News on August 18, 2021. The NOA was sent to the same agencies and entities that received notification of the NOP. The NOA was sent to government agencies, neighboring cities, and non-governmental interested parties. The NOA and Notice of Completion (NOC) were both submitted electronically to the State Clearinghouse for distribution to State agencies. The NOA and DEIR materials were also available on the City's website during the entire DEIR review period. Notification was also submitted to local Native American Tribal Governments in accordance with CEQA statutes, guidelines, and Assembly Bill (AB) 52.

Agency Mailing List Recipients

State of California (through OPR)

State Clearinghouse
Department of Transportation District 12
Caltrans - Planning HQ LD-IGR
CA Department of Conservation
Native American Heritage Commission
Dept. of Toxic Substances Control
Department of Fish and Wildlife, SouthCoast Region 5
Office of Emergency Services
California Highway Patrol

Orange County

Orange County Clerk Recorder
Orange County Development Services
Orange County Fire Authority Planning and Development
Orange County Flood Control District
Orange County Local Agency Formation Commission (LAFCO)
Orange County Public Library (Garden Grove Branch)

Orange County Sanitation District
Orange County Transit Authority (OCTA)

Regional

Joint Forces Training Base Los Alamitos
Santa Ana Regional Water Quality Control Board
Southern California Association of Governments
South Coast Air Quality Management District CEQA IGR

Local Cities

City of Anaheim Planning Department
City of Cypress Planning Department
City of Fountain Valley Planning Department
City of Los Alamitos Planning Department
City of Orange Planning Department
City of Santa Ana Planning Department
City of Seal Beach Planning Department
City of Stanton Planning Department
City of Westminster Planning Department

Transportation

Orange County Transit Authority (OCTA)
Union Pacific Railroad

Education

Garden Grove Unified School District

Utilities/Services

Garden Grove Sanitation District (Republic Services)
Southern California Edison
Southern California Gas Company
Spectrum Pacific West LLC
AT&T

Notice of Preparation Distribution/Consultation



NOTICE OF PREPARATION

DATE: June 28, 2021

TO: Responsible Agencies, Trustee Agencies, and Interested Parties

LEAD AGENCY: City of Garden Grove
Contact: Chris Chung
11222 Acacia Parkway
Garden Grove, California 92507

SUBJECT: Notice of Preparation of a Draft Environmental Impact Report for the City of Garden Grove Focused General Plan Update and Zoning Amendments¹

NOTICE OF PREPARATION REVIEW PERIOD: June 30, 2021 to July 30, 2021

The City of Garden Grove (City) will be the Lead Agency and will prepare a Draft Environmental Impact Report (DEIR) pursuant to the California Environmental Quality Act (CEQA) for the proposed Focused General Plan Update (GPU) and Zoning Amendments (Project). For responsible and trustee agencies, we are interested in your agency's views as to the appropriate scope and content of the DEIR pertaining to your agency's statutory responsibilities related to the Project. We will need the name of a contact person for your agency. For interested individuals, we would like to be informed of environmental topics of interest to you regarding the Project.

The City has already determined that an EIR is required for the proposed Focused GPU and Zoning Amendments, however, as permitted by CEQA Guidelines Section 15060(d) (Preliminary Review), the City prepared an Initial Study (see attached) for the Project to determine which potential impacts are required to be analyzed further in the EIR and which impacts do not require any further evaluation (aesthetics, agriculture/forest resources, mineral resources, and wildfire do not require further evaluation).

¹ Per Title 14, California Code of Regulations, California Environmental Quality Act (CEQA) Guidelines, Sections 15082(a), 15103, and 15375

Pursuant to CEQA Guidelines Section 15082(a)(2), the proposed Project, its location, and its potential environmental effects are described in the **attached Initial Study**. The City welcomes public input during the Notice of Preparation (NOP) review period. Due to the time limits mandated by the CEQA Guidelines, your response must be sent not later than 30 days after your receipt of this notice. If no response or request for additional time is received by the end of the review period, the City may presume that you have no response. (CEQA Guidelines § 15103.)

Please send your comments to:

Chris Chung, Urban Planner
City of Garden Grove
Planning Services Division
11222 Acacia Parkway
Garden Grove, California 92840
(714) 741-5314
chrisc@ggcity.org

To allow for mailing, receipt, and 30-day review of this NOP, the comment period closes on July 30, 2021.



Chris Chung, Urban Planner

6/30/21

Date

SCOPING MEETING

Pursuant to CEQA Guidelines Section 15082(c) (Notice of Preparation and Determination of Scope of EIR), the City will conduct a scoping meeting for the purpose of soliciting comments from adjacent cities, responsible agencies, trustee agencies, and interested parties requesting notice as to the appropriate scope and content of the Draft EIR.

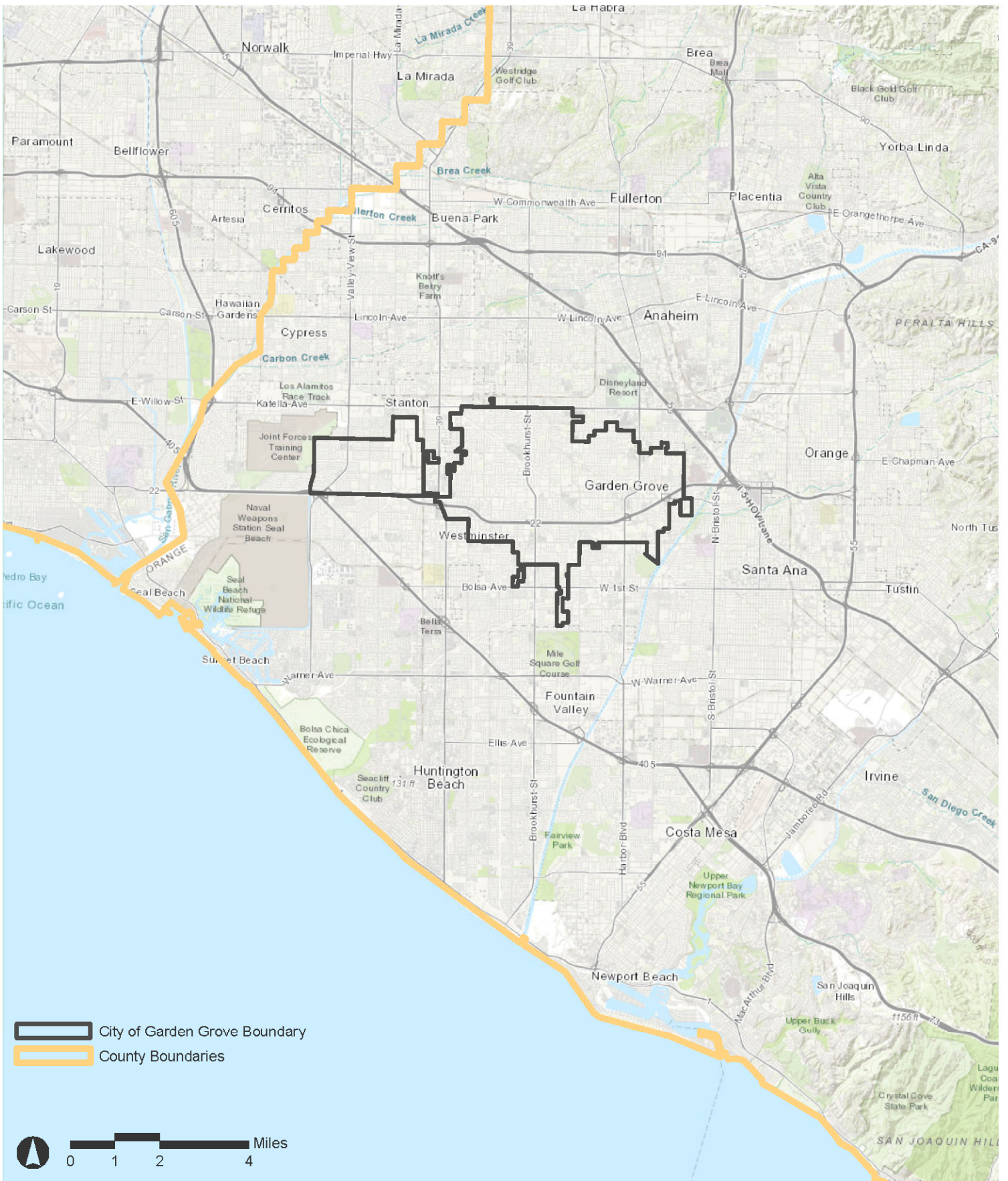
The purpose of the meeting is to present the Project and environmental topics in a public setting and provide an opportunity for the City to hear from the community and interested agencies on what potential environmental issues are important to them. The meeting will include a brief presentation of the proposed Project, the EIR process, and the topics to be analyzed in the EIR. Following the presentation, interested agencies, organizations, and members of the public will be encouraged to offer their views concerning what environmental issues should be included in the Draft EIR.

The Virtual Public Scoping Meeting will be held via Zoom on the following date/time:

Wednesday, July 14, 2021 at 06:00 PM to 08:00 PM

<https://zoom.us/j/98094503234>

Zoom Meeting ID: 980 9450 3234



Source: Esri World Terrain Base and Reference, 2020.

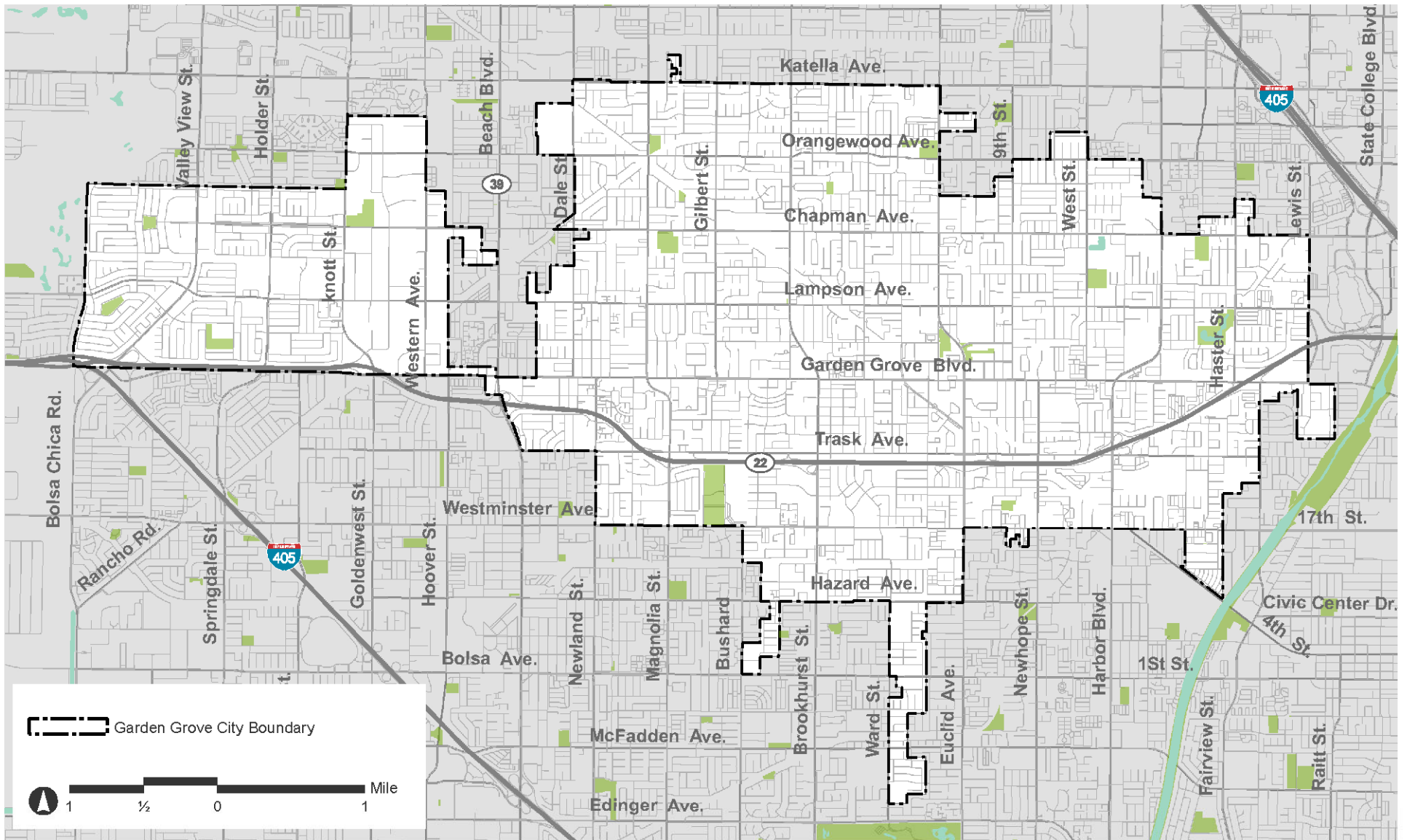
<http://www.mig.com> • 951-787-9222

Exhibit 1 Regional Context Map

Focused General Plan Update and Zoning Amendments
Garden Grove, California



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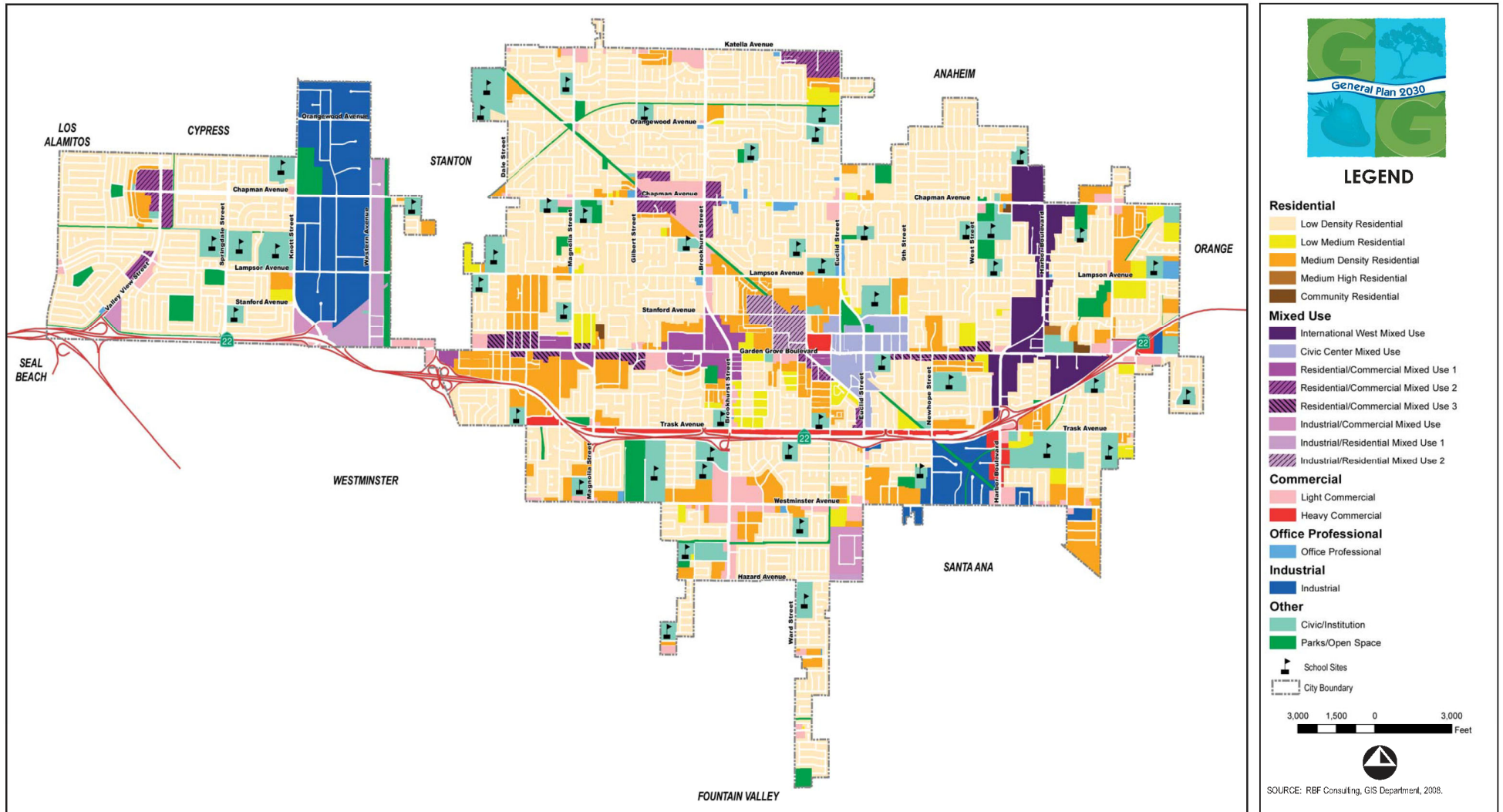
Source: SCAG GIS and MIG, 2021.
<http://www.migcom.com> • 951-787-9222

Exhibit 1 Project Vicinity Map

Focused General Plan Update and Zoning Amendments
 Garden Grove, California

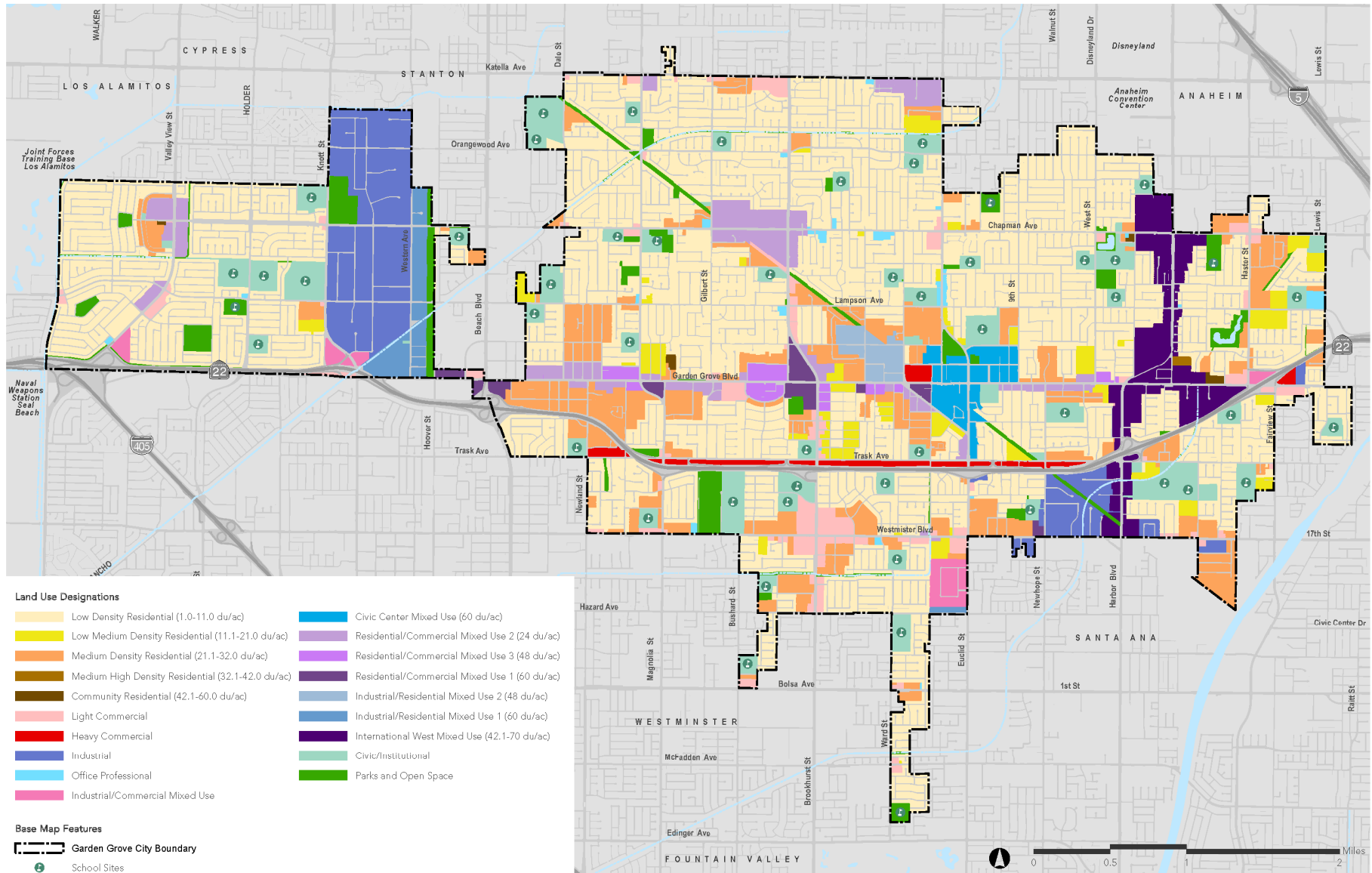


4.0 Public Circulation



Source: City of Garden Grove and RBF, 2008.
<http://www.mig.com> • 951-787-9222





Source: City of Garden Grove and MIG, 2021.
<http://www.migcom.com> • 951-787-9222



Exhibit 4 Proposed Land Use Plan
 Focused General Plan Update and Zoning Amendments
 Garden Grove, California

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Garden Grove Focused General Plan Update and Zoning Amendments

MITIGATION MONITORING AND REPORTING PROGRAM

This Mitigation Monitoring and Reporting Program (MMRP) identifies Mitigation Measures incorporated from the **Garden Grove Focused General Plan Update and Zoning Amendments (FGPUZA) Draft EIR**. For each Mitigation Measure, the MMRP identifies the potentially significant impact, the related mitigation measure, the implementation entity, the monitoring and verification entity, and timing requirements.

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IDENTIFIED IMPACT	RELATED MITIGATION MEASURE	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
AIR QUALITY						
<p>AQ-1: Consistency with SCAQMD Air Quality Management Plan.</p> <p>AQ-2: Cumulatively Considerable Net Increase of Criteria Pollutants.</p> <p>AQ-3: Expose Sensitive Receptors to Substantial Pollutant Concentrations</p> <p>AQ-5: Cause substantial adverse cumulative air quality impacts.</p>	<p>AQ-2A: Require a Project-level Construction Air Quality Assessment for New Discretionary Development Projects.</p> <p>Prior to a discretionary approval by the City for development projects subject to CEQA (meaning, non-exempt CEQA projects), project applicants shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts to the City for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the SCAQMD’s adopted thresholds of significance, the City shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City. Mitigation measures to reduce construction-related emissions</p>	Project Applicant	City of Garden Grove Planning Division and Building Division.	Prior to discretionary project approval.		

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	<p>could include, but are not limited to:</p> <ul style="list-style-type: none"> • Require the selection of specific construction equipment (e.g., specialized pieces of equipment with smaller engines or equipment that will be more efficient and reduce engine runtime). • Require equipment to use alternative fuel sources (e.g., electric-powered and liquefied or compressed natural gas), meet cleaner emission standards (e.g., U.S. EPA Tier IV Final emissions standards for equipment greater than 50-horsepower), and/or utilize added exhaust devices (e.g., Level 3 Diesel Particular Filter). • Limit the idling time of diesel-powered construction equipment to two (2) minutes. • Ensure that construction equipment is properly serviced and maintained to the manufacturer's standards. • Limit on-site vehicle travel speeds on unpaved roads to 15 miles per hour. • Require wheel washers for all exiting trucks or wash off all trucks and equipment leaving the project area. • Require the application of Low-VOC 					

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	paints to interior and/or exterior surfaces (e.g., paints that meet SCAQMD Rule 1113 “Low-VOC” or “Super-Compliant” requirements). A list of applicable architectural coating manufacturers can be found on the South Coast AQMD’s website.					
<p>AQ-1 Consistency with SCAQMP Air Quality Management Plan.</p> <p>AQ-2: Cumulatively Considerable Net Increase of Criteria Pollutants.</p> <p>AQ-5: Cause substantial adverse cumulative air quality impacts.</p>	<p>AQ-2B: Require a Project-level Operational Air Quality Assessment for New Discretionary Development Projects.</p> <p>Prior to a discretionary approval by the City for development projects subject to CEQA (meaning non-exempt CEQA projects) project applicants shall prepare and submit a technical assessment evaluating potential project operation air quality impacts to the City for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology in assessing air quality impacts. If operation-related air pollutants are determined to have the potential to exceed the SCAQMD’s adopted thresholds of significance, the City shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational activities. The identified measures shall be included as part of the conditions of</p>	Project Applicant	City of Garden Grove Planning Division and Building Division.	Project approval (subject to conditions of approval). Prior to occupancy to verify implementation.		

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	<p>approval. Possible mitigation measures to reduce operational emissions could include, but are not limited to the following:</p> <ul style="list-style-type: none"> • New one and two-family dwellings and townhomes shall include electric vehicle infrastructure consistent with Section A4.106.8.1 of the 2019 CalGreen Code. • New multifamily dwellings with 17 or more units shall provide electric vehicle charging spaces capable of supporting electric vehicle supply equipment pursuant to Section A4.106.8.2. • New multifamily dwelling units shall provide bicycle parking pursuant to Section A4.106.9.2. • New non-residential development with more than 10 tenant-occupants shall provide changing/shower facilities for tenant-occupants in accordance with Table A5.106.4.3 of the 2019 CalGreen code. • New non-residential development shall provide designated parking for any combination of low-emitting, fuel-efficient, and carpool/van pool vehicles pursuant 					

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	<p>to the Tier 1 requirements of Table A5.106.5.1.1 of the 2019 CalGreen code. Such parking spaces shall be marked pursuant to Section A5.106.5.1.3 of the 2019 CalGreen code.</p> <ul style="list-style-type: none"> • New non-residential development shall provide electric vehicle charging spaces capable of supporting electric vehicle supply equipment pursuant to the Tier 1 requirements of Section A5.106.5.3.1 of the 2019 CalGreen code. Such spaces shall be marked pursuant to Section A5.106.5.3.3 of the 2019 CalGreen code. • Site-specific developments with truck delivery and loading areas and truck parking spaces shall include signage as a reminder to limit idling of vehicles while parked for loading/unloading in accordance with California Air Resources Board Rule 2845 (13 CCR Chapter 10 § 2485). • Provide facilities to support electric charging stations per Section A5.106.5.3 (Nonresidential Voluntary Measures) and Section A5.106.8.2 (Residential Voluntary Measures) of the 2019 CALGreen 					

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	<p>Code.</p> <ul style="list-style-type: none"> Applicants for future development projects along existing and planned transit routes shall coordinate with the City and Orange County Transportation Authority to ensure that bus pad and shelter improvements are incorporated, as appropriate. 					
<p>AQ-1 Consistency with SCAQMP Air Quality Management Plan.</p> <p>AQ-2: Cumulatively Considerable Net Increase of Criteria Pollutants.</p> <p>AQ-5: Cause substantial adverse cumulative air quality impacts.</p>	<p>AQ-2C: Transportation Demand Management</p> <p>The City shall require all new residential and non-residential development that meets the following criteria to incorporate measures to meet vehicle trip generation rates that are twenty percent lower than the standard rates as established in the most recent edition of the Institute of Transportation Engineers (ITE) trip generation manual:</p> <ul style="list-style-type: none"> New multi-unit development of ten units or more; New nonresidential development of ten thousand square feet or more; Additions to nonresidential buildings that are ten thousand square feet or more in size that expand existing gross floor area by 	Project Applicant	City of Garden Grove Planning Division and Building Division.	Project approval (subject to conditions of approval). Prior to occupancy to verify implementation.		

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	<p>ten percent or more; and</p> <ul style="list-style-type: none"> Establishment of a new use, change of use, or change in operational characteristics in a building that is ten thousand square feet or more in size that results in an average daily trip increase of more than ten percent of the current use, based on the most recent Institute of Traffic Engineers (ITE) trip generation rates. <p>Projects subject to TDM requirements may implement any combination of measures to achieve the twenty percent reduction. Measures may include, but are not limited to:</p> <ul style="list-style-type: none"> Connecting the project site to adjacent / nearby bicycle paths; Long-term bicycle parking; Bicycle fix-it stations with repair tools and an air pump; Scheduled mobile bicycle repair service; Commuter incentives and reward programs; Parking management strategies, such as reserved vanpool parking 					

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	and/or preferential carpool parking; <ul style="list-style-type: none"> • Transit subsidies; • Vanpool subsidies; • Pre-tax transit deduction payroll option; • Pre-tax parking deduction payroll option (for parking at a transit station); • Guaranteed ride home; • Paid parking at prevalent market rates. • Shuttle option; • Telework option; and On-site amenities (e.g., ATM, day care, cafeteria, exercise facilities, on-site transit pass sales, etc.).					
GREENHOUSE GAS EMISSIONS						
GHG-1: Generate GHG emissions, either directly or indirectly that may have a significant impact GHG-2: Conflict With an	See Mitigation Measures AQ-2A through 2C shown above and Mitigation Measures VMT-1 and VMT-2 shown below					

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
<p>Applicable GHG Reduction Plan, Policy or Regulation.</p> <p>GHG-3: Cause Substantial Adverse Cumulative Impacts with Respect to Greenhouse Gases</p>						
HYDROLOGY AND WATER QUALITY						
<p>Hydro-2: Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management for the basin</p>	<p>See Mitigation Measure UTIL-1 below</p>					

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
NOISE						
<p>Noise-3: Exposure to Noise Levels in Excess of Standards.</p> <p>Noise 4: Cause a Substantial Adverse Cumulative Impact with Respect to Noise or Vibration.</p>	<p>NOI-2: To ensure compliance with the City’s exterior and interior noise standards, all new development that may occur under the General Plan Update shall include noise reduction design measures (i.e., attenuation barriers, double pane windows, sound attenuating building walls, incorporate architecturally attenuating features, landscaping, etc.) where conditions exceed the Noise and Land Use Compatibility Criteria “Normally Acceptable” noise exposure levels.</p>	Project Applicant	City of Garden Grove Planning Division and Building Division	Prior to discretionary project approval.		
TRANSPORTATION						
<p>Trans 2: Conflict with VMT Guidelines .</p> <p>Trans-4: Cause a Substantial Adverse Cumulative Impact with Respect to Transportation.</p>	<p>Projects in Zone 1 and Transit Priority Areas (TPAs). Per the City of Garden Grove Traffic Impact Analysis Guidelines for VMT and Level of Service Assessment projects located in Zone 1 areas and TPAs (with meeting criteria) can be presumed not to have a significant VMT impact and can be screened from VMT analysis. Therefore, no VMT mitigation is necessary for project located in Zone 1 areas.</p> <p>VMT-1 Zone 2 Projects. Projects proposed in Zone 2 areas may or</p>	Project Applicant	City of Garden Grove Planning Division and Building Division.	<p>Prior to discretionary project approval.</p> <p>AND</p> <p>Project approval (subject to conditions of approval). Prior to occupancy to verify implementation.</p>		

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	<p>may not have a VMT impact and are required to provide further VMT analysis to verify and quantify potential impacts. Mitigation for impacts in Zone 2 areas is likely to be of a lower intensity due to the Zone 2 areas having a more efficient VMT than the county average, but not efficient enough to be lower than the City VMT impact threshold. Potential measures to be identified in the VMT analysis could include, but are not limited to:</p> <ul style="list-style-type: none"> • Incorporate affordable housing into the project; • Orient the project toward transit, bicycle and pedestrian facilities; • Provide bicycle parking; • Unbundle parking costs (selling or leasing a parking space separate from the purchase or lease of a multifamily residential unit); • Provide parking cash-out programs; • Provide car-sharing, bike sharing, and ride-sharing programs; • Provide transit passes; and/or • Increase project density. 					

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	<p>VMT-2 Zone 3 Projects. Projects proposed in Zone 3 areas would be expected to have a VMT impact and would need further VMT analysis to determine the significance of the impact. Mitigation for impacts in Zone 3 areas is likely to be of a higher intensity than Zone 2 areas due to the VMT inefficiency. Potential measures to be identified in the VMT analysis could include, but are not limited to:</p> <ul style="list-style-type: none"> • measures identified for Zone 2 areas; • improve or increase access to transit; • increase access to common goods and services, such as groceries, schools, and daycare; • incorporate neighborhood electric vehicle network; • improve pedestrian or bicycle networks, or transit service; • provide traffic calming; • implement roadway pricing; • locate the project near transit; 					

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	<ul style="list-style-type: none"> • increase the mix of uses within the project or within the project’s surroundings; • increase connectivity and/or intersection density on the project site; <p>VMT-3 Mitigation Exchange or Bank. The City may evaluate the feasibility of a local or regional VMT impact bank or exchange program. Such an offset program, if determined feasible, would be administered by the City or by a regional agency, and would offer demonstrated VMT reduction strategies through transportation demand management programs, impact fee programs, mitigation banks or exchange programs, in-lieu fee programs, or other land use project conditions that reduce VMT in a manner consistent with state guidance on VMT reduction. If, through onsite changes, a subject project cannot demonstrate consistency with state guidance on VMT reduction, the project can contribute on a pro-rata basis to a local or regional VMT reduction</p>					

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	bank or exchange, as necessary, to reduce net VMT impacts.					
UTILITIES AND SERVICE SYSTEMS						
Relocation or Construction of Util-1: New or Expanded Water, Wastewater Treatment, Stormwater Drainage, Electric Power, Natural Gas, or Communications Facilities. Util-2: Have Sufficient Water Supplies Available to Serve the Project and Reasonably Foreseeable Future Development. Util-3; Wastewater Treatment Capacity	<p>UTL-1: Water Supply. New developments under the General Plan Update that will be served by local water utility providers will not be approved if they increase water use in excess of what is identified for supply in 2040 under the most recent Urban Water Master Plan for the involved local water provider.</p> <p>UTL-2: Wastewater Treatment. The City shall not approve new development if it would increase wastewater generation demand in excess of the treatment capacity available and planned for in 2040 as described in the most current master planning document of the Orange County Sanitation District.</p>	Project Applicant	City of Garden Grove Planning Division and Building Division.	Proof of adequate water supply prior to discretionary project approval.		
		Project Applicant	City of Garden Grove Planning Division and Building Division.	Proof of adequate wastewater treatment capacity prior to discretionary project approval.		