

---

# Final Supplemental Environmental Impact Report

# Site B-2 Hotel Project

---

STATE CLEARINGHOUSE NUMBER 2022060174

**MAY 2026**

*Prepared for:*

**CITY OF GARDEN GROVE**

Office of Economic Development

11222 Acacia Parkway

Garden Grove, California 92840

*Contact: Monica Covarrubias, Senior Project Manager*

*Prepared by:*

**DUDEK**

27271 Las Ramblas, Suite 340

Mission Viejo, California 92691

*Contact: Rachel Struglia, PhD, AICP*



---

# Table of Contents

<b>SECTION</b>	<b>PAGE NO.</b>
Acronyms and Abbreviations.....	ACR-1
1 Introduction .....	1-1
1.1 Contents and Organization of the Final Supplemental Environmental Impact Report .....	1-2
1.2 Draft SEIR Comments .....	1-2
2 Responses to Comments Received .....	2-1
Comment Letter – Caltrans (A1) .....	2-3
Response to Comment Letter A1 .....	2-5
Comment Letter – SAFER (O1) .....	2-7
Response to Comment Letter O1 .....	2-9
Comment Letter – Unite Here Local 11 (O2) .....	2-11
Response to Comment Letter O2 .....	2-39
References .....	2-76
3 Changes to the Draft Supplemental Environmental Impact Report .....	3-1
3.1 Introduction.....	3-1
3.2 Changes to the Draft SEIR .....	3-1
3.2.1 Changes to the Table of Contents, Tables .....	3-1
3.2.2 Changes to Chapter 1, Executive Summary.....	3-2
3.2.3 Changes to Chapter 3, Project Description .....	3-15
3.2.4 Changes to Section 4.1, Greenhouse Gas Emissions .....	3-15
3.2.5 Changes to Section 4.2, Transportation.....	3-36
4 Supplemental Mitigation Monitoring and Reporting Program.....	4-1
4.1 Introduction.....	4-1
4.2 Supplemental MMRP Table .....	4-1
5 General Responses to Post–Public Review Comment Letters Received .....	5-1

## TABLES

2-1	Comments Received on the Draft Supplemental Environmental Impact Report.....	2-1
4.2-4	VMT Reduction for Project-Generated VMT per Employee .....	3-37
4-1	Supplemental Mitigation Monitoring and Reporting Program.....	4-2
5-1	Representative Comment Letters Received After Close of the Public Review Period .....	5-1

## APPENDIX

A	Employee VMT Estimation for Site B-2 Hotel Project Memorandum
---	---

INTENTIONALLY LEFT BLANK

# Acronyms and Abbreviations

Acronym/Abbreviation	Definition
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CEQA	California Environmental Quality Act
CNG	compressed natural gas
CTR	Commute Trip Reduction
EIR	environmental impact report
EV	electric vehicle
EVSE	Electric Vehicle Supply Equipment
GHG	greenhouse gas
ITE	Institute of Transportation Engineers
LEED	Leadership in Energy and Environmental Design
MM	Mitigation Measure
MMRP	Mitigation Monitoring and Reporting Program
MND	Mitigated Negative Declaration
MT CO <sub>2</sub> e	metric tons carbon dioxide equivalent
NOP	Notice of Preparation
OCTAM	Orange County Transportation Analysis Model
OD	Origin/Destination
PA	Production/Attraction
PDF	project design feature
PRC	California Public Resources Code
RHNA	Regional Housing Needs Assessment
SAFER	Supporters Alliance for Environmental Responsibility
SANDAG	San Diego Association of Governments
SCAG	Southern California Association of Governments
SEIR	Supplemental Environmental Impact Report
South Coast AQMD	South Coast Air Quality Management District
TAZ	traffic analysis zone
TDM	transportation demand management
TNC	Transportation Network Company
TSF	thousand square feet
VMT	vehicle miles traveled
VOC	volatile organic compound

INTENTIONALLY LEFT BLANK

---

# 1 Introduction

In accordance with the California Environmental Quality Act (CEQA) Guidelines (CEQA Guidelines) Section 15088 and the Writ of Mandate (Appendix B to the Site B-2 Hotel Draft Supplemental Environmental Impact Report [SEIR]), the City of Garden Grove, as the lead agency, has evaluated the comments received regarding the Draft SEIR, dated September 2025. This Final SEIR assesses the potentially significant environmental effects of the Site B-2 Hotel Project (Project), SCH No. 2022060174.

As described in the Draft SEIR, the proposed Project would involve construction of a full-service high-rise (maximum height of 350 feet) resort hotel with hotel program entertainment/pool deck (height of approximately 61 feet) on a 3.72-acre site at the northwest corner of Harbor Boulevard and Twintree Avenue in the City of Garden Grove (City). The Project site is previously disturbed where the north-northeastern parcels of the Project site are paved and used for excess parking for the adjacent Sheraton Hotel; the remaining parcels are vacant dirt pads with limited vegetation. The proposed hotel would include 500 guest suites with balconies and guest amenities/services reserved exclusively for hotel patrons, such as a themed pool experience with lazy river; a theater; a ballroom; meeting rooms; food and beverage spaces, themed amenities and shops, and an arcade; and a spa and fitness center. The proposed Project would also include a five-level parking garage (approximately 61 feet in height, with four levels above grade and one level below grade) with a total of 528 spaces, including spaces available for valet parking. Project construction would last approximately 30 months and would be completed in a single phase.

The City will rely on the environmental impact analysis presented in this Final SEIR when issuing discretionary approvals associated with implementing the Project. In addition to City approvals, approvals from other state and local agencies may rely on the Final SEIR to the extent the Project requires discretionary approval from those agencies, including the following:

- **California Department of Transportation (Caltrans)** – Encroachment permit for any activity in a Caltrans right-of-way

If the Project requires other discretionary approvals from state or local agencies, those agencies may rely on the Final SEIR, pursuant to Section 21069 of the California Public Resources Code, as responsible agencies.

Before approving a project, CEQA requires the lead agency to prepare and certify a Final EIR (in this case, a Final SEIR). The contents of a Final EIR are specified in Section 15132 of the CEQA Guidelines as follows:

The Final EIR shall consist of:

- A. The draft EIR or a revision of the draft.
- B. Comments and recommendations received on the draft EIR either verbatim or in summary.
- C. A list of persons, organizations, and public agencies commenting on the draft EIR.
- D. The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- E. Any other information added by the Lead Agency.

The lead agency must provide each agency that commented on the Draft SEIR with a copy of the lead agency's proposed response at least 10 days before certifying the Final SEIR.

## 1.1 Contents and Organization of the Final Supplemental Environmental Impact Report

This Final SEIR will be used by the City as an informational document for the proposed Project. The Final SEIR, in compliance with Section 15132 of the CEQA Guidelines, is organized as follows:

**Chapter 1, Introduction.** This chapter provides a general overview of the proposed Project and the Final SEIR.

**Chapter 2, Responses to Comments Received.** This chapter includes a list of those who provided comments on the Draft SEIR during the public review period. This chapter also includes the comments received on environmental issues raised during the public review process for the Draft SEIR, and the City's responses to these comments. Each comment is assigned a comment number that corresponds to a response.

**Chapter 3, Changes to the Draft Supplemental Environmental Impact Report.** This chapter contains a summary of changes made to the document since publication of the Draft SEIR. Changes are signified by strikethrough text (i.e., ~~strikethrough~~) where text was removed, and by underlined text (i.e., underline) where text was added. As reflected in Chapter 3, these revisions make insignificant changes to the Draft SEIR and do not qualify as significant new information as described in CEQA Guidelines Section 15088.5(a).

**Chapter 4, Supplemental Mitigation Monitoring and Reporting Program.** This chapter of the Final SEIR provides the Supplemental Mitigation Monitoring and Reporting Program (MMRP) for the proposed Project. The Supplemental MMRP is presented in table format and identifies mitigation measures for the proposed Project, the party responsible for implementing each mitigation measure, the timing for implementing each mitigation measure, and the monitoring and reporting procedures for each mitigation measure.

**Chapter 5, General Responses to Post-Public Review Comment Letters Received.** This chapter includes three representative comment letters on the Draft SEIR that were received after the public review period and provides general responses to these letters, despite their having arrived outside the public review period.

**Appendix A, Employee Estimation Memorandum.** This appendix provides clarifying information relating to the methodology used for employee estimation in the SEIR's analysis.

## 1.2 Draft SEIR Comments

A Notice of Availability of the Draft SEIR was sent to agencies and interested parties on September 22, 2025, and the Draft SEIR was circulated for public review from September 22, 2025, through November 6, 2025. The City received three comment letters during the 2025 public review period from the following commenters:

- Caltrans
- Rebecca Davis, Lozeau Drury LLP, for Supporters Alliance for Environmental Responsibility (SAFER)
- Law Office of Jordan R. Sisson for Unite Here Local 11

A list of the comments received, copies of the comment letters received, and responses to comments are included in Chapter 2 of this Final SEIR.

---

## 2 Responses to Comments Received

This chapter of the final Supplemental Environmental Impact Report (Final SEIR) includes a copy of all comment letters that were submitted during the public review period for the Draft SEIR for the proposed Site B-2 Hotel Project (Project), along with responses to those comments in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15088. The public review period for the Draft SEIR began on September 22, 2025, and ended on November 6, 2025.

One public scoping meeting was held on April 30, 2025. Comments received during the scoping meeting and in writing during the scoping period were included in the Draft SEIR in Chapter 2, Introduction, and included in Appendix A, Notice of Preparation and Scoping Comments, of the Draft SEIR.

All written letters commenting on the Draft SEIR during the public comment period have been coded with a letter and number to facilitate identification and tracking (see Table 2-1). The comment letters were reviewed and divided into individual comments. Individual comments and the responses to them were assigned corresponding numbers (e.g., A1-1, A1-2, A1-3). Each comment letter submitted by an agency is identified by an (A), and letters from organizations are identified by an (O). To aid readers and commenters, electronically bracketed comment letters have been reproduced in this document, with the corresponding responses provided immediately following each comment letter.

**Table 2-1. Comments Received on the Draft Supplemental Environmental Impact Report**

Comment Letter Designation	Commenter	Date
<b>Agencies</b>		
A1	California Department of Transportation (Caltrans)	October 16, 2025
<b>Organizations</b>		
O1	Rebecca Davis, Lozeau Drury LLP, for Supporters Alliance for Environmental Responsibility (SAFER)	November 3, 2025
O2	Law Office of Jordan R. Sisson for Unite Here Local 11	November 6, 2025

**Notes:** A = agency; O = organization.

The lead agency must evaluate comments on the Draft EIR and prepare written responses for inclusion in the Final EIR (California Public Resources Code Section 21091[d]; 14 CCR 15088[a], 14 CCR 15132). The written responses must describe the disposition of any “significant environmental issues” raised by commenters (California Public Resources Code Section 21091[d][2][B]); 14 CCR 15088[c], 14 CCR 15132[d], 14 CCR 15204[a]).

INTENTIONALLY LEFT BLANK

Comment Letter A1

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 12  
1750 EAST 4<sup>TH</sup> STREET, SUITE 100  
SANTA ANA, CA 92705  
PHONE (657) 328-6000  
FAX (657) 328-6522  
TTY 711  
www.do.ca.gov/caltrans-near-me/district12



Making Conservation  
California Way of Life.

October 16, 2025

File: IGR/CEQA  
SCH#: 2022060174  
LDR LOG #2022-02496

Ms. Monica Covarrubias  
Planning Services Division  
11222 Acacia Parkway  
Garden Grove, California  
92840

Dear Ms. Covarrubias,

Thank you for including the California Department of Transportation (Caltrans) in the review of the Draft Supplemental Environmental Impact Report for the Site B-2 Hotel Project. The proposed Project involves construction of a full-service, maximum height of 350 feet, hotel with a hotel program entertainment/pool deck (height of approximately 61 feet) on the 3.72-acre site. The proposed hotel would include 500 guest suites with balconies and guest amenities/services such as a themed pool experience with lazy river, theater, a ballroom, meeting rooms, food and beverage spaces, themed amenities and shops, an arcade and spa and fitness center. The proposed Project would also include a five-level (approximately 61 feet) parking garage (four levels above grade and one level below grade) with a total of 528 spaces inclusive of spaces available for valet parking.

A1-1

The mission of Caltrans is Improving lives and communities through transportation. Caltrans is a reviewing agency on this project and has the following comment:

A1-2

1. Consider installing high visibility crosswalks in all three existing crosswalks at the intersection of Twintree Lane and Harbor Blvd to increase visibility of pedestrian crossings.

*"Improving lives and communities through transportation."*

Ms. Monica Covanubias  
October 16, 2025  
Page 2

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 at Maryam Molavi at [Maryam.Molavi@dot.ca.gov](mailto:Maryam.Molavi@dot.ca.gov).

A1-3

Sincerely,

  
Scott Shelley (Oct 16, 2025 09:40:39 PDT)

Scott Shelley  
Branch Chief – Local Development Review/Climate Change/Transit  
Grants District 12

*"Improving lives and communities through transportation."*

## Response to Comment Letter A1

California Department of Transportation, District 12  
Scott Shelley  
Branch Chief – Local Development Review/Climate Change/Transit Grants  
October 16, 2025

- A1-1** This comment repeats the Draft SEIR’s summary of the Project. No response is necessary.
- A1-2** This comment recommends the installation of high visibility crosswalks at all three existing crosswalks at the intersection of Twintree Lane and Harbor Boulevard to increase the visibility of pedestrian crossings.
- The comment does not reference a specific CEQA topic area or section of the Draft SEIR. Nonetheless, **Mitigation Measure (MM) GHG-5** already requires the Project to implement measures that will encourage use of transit, bicycling and walking. Specifically, that mitigation measure requires the Project to “Improve the walkability and design of the Project by providing pedestrian and bicycling connections within the Project site and to adjacent off-site facilities (i.e., sidewalks, crosswalks, wayfinding signage, etc.)” Although not required to mitigate Project impacts, the City and Project applicant will evaluate the viability of the California Department of Transportation (Caltrans) request and, if merited and prior to Project operations, the City and Project applicant will install high visibility crosswalks at the location of the three existing crosswalks at the Twintree Lane and Harbor Boulevard intersection. A condition of approval has been added to the proposed Project accordingly.
- A1-3** This comment requests the City to continue to coordinate with Caltrans for any future development that could impact state transportation facilities. The City will continue to coordinate with Caltrans.

INTENTIONALLY LEFT BLANK



T 510.836.4200 | 1939 Harrison Street, Ste. 150 | www.lozeaudrury.com  
F 510.836.4205 | Oakland, CA 94612 | rebecca@lozeaudrury.com

November 3, 2025

**Via Email**

Monica Covarrubias, Senior Project Manager  
Economic Development and Housing Department  
City of Garden Grove  
11222 Acacia Parkway  
Garden Grove, CA 92507  
monicac@ggcity.org

**Re: Comment on Draft Supplemental Environmental Impact Report for Site B-2 Hotel Project (SCH 2022060174)**

Dear Ms. Covarrubias:

This comment is submitted on behalf of Supporters Alliance for Environmental Responsibility (“SAFER”) regarding the Draft Supplemental Environmental Impact Report (“DSEIR”) prepared for the Site B-2 Hotel Project (SCH 2022060174), which proposes the construction of a 23-story, 500-room hotel with a five-level parking garage located at the northwest corner of Harbor Boulevard and Twintree Avenue, along the west and east sides of, and on, Thackery Drive in the City of Garden Grove (“Project”).

01-1

SAFER is concerned that the DSEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project’s impacts. SAFER requests that the City address these shortcomings in a revised draft supplemental environmental impact report and recirculate it prior to considering approvals for the Project.

01-2

SAFER reserves the right to supplement these comments during the administrative process. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997).

01-3

Sincerely,

Rebecca Davis  
Lozeau Drury LLP

INTENTIONALLY LEFT BLANK

## Response to Comment Letter O1

Rebecca Davis, Lozeau Drury LLP  
On Behalf of SAFER  
November 3, 2025

**01-1** This comment provides a partial summary of the Project description in the Draft SEIR. No response is necessary.

**01-2** The comment alleges that the Draft SEIR fails as an informational document and also that it does not include all feasible mitigation measures to reduce the Project's impacts.

The comment does not identify any specific deficiencies in the Draft SEIR. The Draft SEIR has been prepared in conformance with CEQA and the CEQA Guidelines. The Draft SEIR analyzes the environmental impacts as identified in, and required by, the Writ of Mandate. Furthermore, the Draft SEIR was prepared by experts in the areas of vehicle miles traveled (VMT) and greenhouse gas (GHG) emissions modeling. The analysis and determinations in the Draft SEIR are supported by substantial evidence (including facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts), as defined in Section 15384 of the CEQA Guidelines.

CEQA Guidelines Section 15088.5, Recirculation of an EIR Prior to Certification, describes the requirements for recirculation of an EIR. This section applies to the SEIR as well. The comment identified no grounds that require recirculation and no further response is necessary.

**01-3** The comment states that SAFER reserves the right to supplement their comments during the administrative process. The comment is noted.

INTENTIONALLY LEFT BLANK

**LAW OFFICE OF JORDAN R. SISSON**  
LAND USE, ENVIRONMENTAL & MUNICIPAL LAW

3993 Orange Street, Suite 201  
Riverside, CA 92501

Office: (951) 405-8127  
Direct: (951) 542-2735

jordan@jrssonlaw.com  
www.jrssonlaw.com

November 6, 2025

**VIA EMAIL:**

Monica Covarrubias, Senior Project Manager  
City of Garden Grove, Economic Development and Housing Department  
11222 Acacia Parkway  
Garden Grove, California 92507  
monicac@ggcity.org

**RE: SEIR COMMENTS (SCH No. 2022060174); SITE B-2 HOTEL PROJECT**

Dear Ms. Covarrubias:

On behalf of UNITE HERE Local 11 ("Local 11"), this office respectfully provides the following comments<sup>1</sup> to the City of Garden Grove ("City") regarding the Supplemental Environmental Impact Report ("SEIR") for the proposed 500-room hotel development ("Project") on an approximately 3.72-acre property located at the northwest corner of Harbor Boulevard and Twintree Avenue ("Site"). Local 11 was a petitioner in the referenced litigation (i.e., *Perez et al. v. City of Garden Grove et al.*) (See [SEIR Appendix B](#)).

02-1

As explained in the sections below, the SEIR and mitigation monitoring reporting program ("MMRP") is an improvement over the prior mitigated negative declaration ("MND"). However, the SEIR should be revised to address the following areas of concern: disclosure of project components, possibly imprecise assumptions about hotel guests (infra section A), greenhouse gas ("GHG") and vehicle miles traveled ("VMT") impacts may have been underestimated (infra section B and C, respectively), the alternative analysis should have included a housing alternative (infra section D), the need for additional/modified MMRP, including additional traffic demand management ("TDM") strategies among other recommendations (infra section E).

02-2

The recommendations included herein would address potential inconsistencies with relevant goals and objectives identified in the City's General Plan, mitigation strategies recommended by the California Air Pollution Control Officers Association ("CAPCOA"), and various policies and recommendations contained in the Southern California Association of Governments ("SCAG") Regional Transportation Plan/Sustainable Communities Strategy ("RTP/SCS") (also known as Connect SoCal) and the California Air Resources Board ("CARB") Scoping Plans. Therefore, the recommendations are relevant to the potential overriding considerations that the City may adopt in its evaluation of the Project's discretionary approval process.

02-3

Local 11 thanks the City for the opportunity to provide the following comments and respectfully requests that the SEIR and MMRP be revised to address the points raised below.

02-4

///

<sup>1</sup> Herein, page citations are either the stated pagination (i.e., "p. #") or PDF-page location (i.e., "PDF p. #")



SEIR Comments RE: B-2 Hotel Project  
 November 6, 2025  
 Page 2 of 27

**A. PROJECT DESCRIPTION**

An “accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR.” (*San Joaquin Raptor Rescue Ctr. v. Cnty. of Merced* (2007) 149 Cal.App.4th 645, 654-655 [quoting *Cnty. of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 199] [emphasis in original].) As one court explained, “only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal’s benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the ‘no project’ alternative), and weigh other alternatives in the balance.” (*Citizens for a Sustainable Treasure Island v. City & Cnty. of San Francisco* (2014) 227 Cal.App.4th 1036, 1052.) Hence, an accurate project description is an “indispensable component of a valid EIR.” (*Western Placer Citizens for an Agr. and Rural Env’t v. Cnty. of Placer* (2006) 144 Cal.App.4th 890, 898.)

O2-5

Here, as discussed below, the SEIR does not disaggregate the individual project components or make enforceable key assumptions that only 1,000 overnight guests will be traveling to and from the Site to access onsite amenities (beyond employees). As discussed below, this infects the SEIR’s GHG/VMT analysis and seems to be a departure from the prior MND and not consistent with experience at other nearby examples cited in the SEIR (i.e., Great Wolf Lodge and Disneyland Forward). (SEIR, PDF p. 165, 176, 196; SEIR VMT Study, PDF pp. 4, 5.)

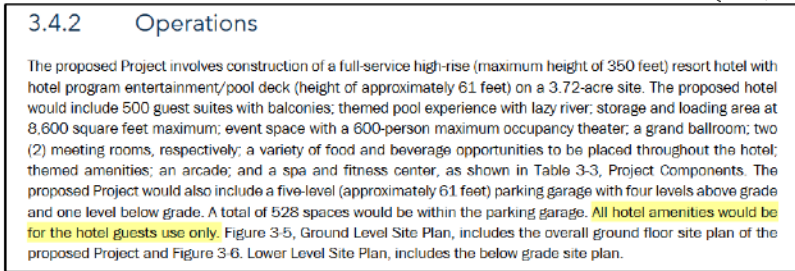
O2-6

**1. PROJECT COMPONENTS AND SIZES ARE NOT DISCLOSED.**

The Project includes various destination/tourist theme park amenities (e.g., a themed pool experience with a lazy river, a 600-person theater, a grand ballroom, themed amenities, and an arcade). (SEIR, PDF pp. 11, 52; MND, PDF pp. 5, 16.) However, the SEIR does not adequately clarify these project components or identify changes made to the Project between the MND and SEIR. As shown in the figures below, the SEIR states that the total building size is 718,919 square feet (“sf”), compared to 691,693 sf as stated in the prior MND. (Compare Fig. 1 with Fig. 2.) Additionally, the SEIR does not disclose the square footage associated with the hotel amenities, which the prior MND disaggregated. (Id.) Moreover, the SEIR relies on a key assumption that all “hotel amenities” would be available to “only” hotel guests.<sup>2</sup> (Fig. 1 below [highlighted section].) It is recommended that this be clarified.

O2-7

FIGURE 1: SEIR EXCERPT (SEIR, PDF P. 52)



<sup>2</sup> See e.g., SEIR, PDF p. 52 (“All hotel amenities would be for the hotel guests use *only*.” Emphasis added), PDF p. 95 (“Ancillary uses associated with the hotel such as restaurant, meeting rooms, entertainment spaces and health and fitness are included within the hotel building square footage as those uses will *only* be available to guests of the hotel.” Emphasis added); SEIR GHG Study, PDF p. 50 (same), PDF pp. 135-136, 208-209 (CalEEMod Worksheet sections 1.2)



SEIR Comments RE: B-2 Hotel Project  
 November 6, 2025  
 Page 3 of 27

FIGURE 1: CONTINUED

**Table 3-3. Project Components**

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

FIGURE 2: MND EXCERPT ([MND](#), PDF P. 16; SEE ALSO [MND Appendices](#), PDF PP. 8)

Project Features	Summary
Project Site Area	3.72 acres (161,933 square feet [SF])
Landscape Area (Additional 12,000 SF to be provided at the podium for a grand total of 51,711 SF of landscape or 31% coverage.)	26,224 SF (at street level) 13,487 SF (at podium level) 39,711 SF (27% coverage)
Total Hotel Rooms	500 keys
Ballroom/Meeting Rooms	
Ballroom	9,490 SF
Meeting Room 'A'	4,194 SF
Meeting Room 'B'	4,031 SF
Restaurant, Lobby, Amenities	
Food and Beverage	22,296 SF
Hotel Themed Amenities	13,238 SF
Nick Studio (Theater)	7,039 SF
Studio Hall	6,448 SF
Nick Arcade	7,000 SF
Spa/Fitness	8,532 SF
Hotel Themed Pool	24,980 SF
Office, Back of House, Others	
Hotel Office (Production)	3,173 SF
Hotel Support (Offices)	11,329 SF
Back of House (Support)	16,492 SF
Retail	5,480 SF
Hotel	289,891 SF
Storage, Loading	8,600 SF
Parking (528 spaces)	249,480 SF
Below Grade Parking	52,206 SF
Hotel Tower Maximum Height	350 feet
Hotel Program Entertainment/Pool Deck	60 feet 7 inches
Total Building Area	691,693 SF

O2-7  
 Cont.



SEIR Comments RE: B-2 Hotel Project  
 November 6, 2025  
 Page 4 of 27

**2. GHG EMISSION ANALYSIS SEEMS TO HAVE ANALYZED A GENERIC HOTEL WITH A MAXIMUM OF 1,000 OVERNIGHT GUESTS**

The SEIR’s GHG Study relies on emissions modeling under CalEEMod, which includes worksheets to show inputs and output results. (SEIR GHG Study, PDF p. 50.) Accordingly, the land use development assumption is that “only” hotel guests will have access to ancillary amenities. (See Fig. 3 below.) This is expressed in the CalEEMod worksheets that analyzed a limited number of uses (i.e., hotel use). (See Fig. 4 below.)<sup>3</sup> This is a departure from the prior MND, which included various land uses (i.e., resort hotel, parking structure, hotel theme pool, theater, etc.) that generated respective emissions. (See Fig. 5 & 6 below.)<sup>4</sup> The GHG analysis in the SEIR should separately account for those ancillary uses. Another example is the Disneyland Forward project, which was a nearby development cited in the SEIR that also included themed-park amenities, which considered separate land uses that included a hotel use and “user defined” recreational uses to account for that development’s unique theme/amusement park uses<sup>5</sup> (which is not a CalEEMod default land use).<sup>6</sup> By not disaggregating the various uses, the SEIR’s GHG modeling may have underestimated the emissions of the Project for the respective emission sectors (i.e., mobile, area, energy, water, waste, etc.). For example, the current CalEEMod modeling does not seem to account for the emissions associated with the themed-pool or 500-seat theater or arcade, which are likely to have emissions that are not captured by a generic hotel land use type.<sup>7</sup>

FIGURE 3: SEIR EXCERPT (SEIR GHG Study, PDF pp. 50)

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

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

02-8

<sup>3</sup> See also SEIR GHG Study, PDF pp. 135-136, 208-209, 135-136, 208-209, 136-137, 209-210 (CalEEMod Worksheet sections 1.2).  
<sup>4</sup> See also MND Appendices, PDF pp. 34 (tbl. 1 Table 1 Land Use Summary), 58 (tbl. 11 Electricity and Natural Gas Usage), 60 (Tbl. 12), 84, 119, 155, 190, 226, 271 (CalEEMod tbl. 1.1).  
<sup>5</sup> Disneyland Forward, GHG Section, PDF pp. 32-33 (referencing air quality section for CalEEMod inputs for operational GHG emissions), [https://www.anaheim.net/DocumentCenter/View/51191/0507\\_Greenhouse\\_Gas\\_Emissions](https://www.anaheim.net/DocumentCenter/View/51191/0507_Greenhouse_Gas_Emissions); id., Air Quality Section, PDF p. 29 (discussing operational inputs relevant to both air quality and GHG analysis), [https://www.anaheim.net/DocumentCenter/View/51186/0502\\_Air\\_Quality](https://www.anaheim.net/DocumentCenter/View/51186/0502_Air_Quality); id., Appendix C-2 CalEEMod Calculations, PDF pp. 5, 36 (500 room hotel use), PDF pp. 79, 124 (5-acre theme Park with user defined recreational use), PDF pp. 195, 230 (5000 stall parking structure with enclosed parking use), PDF pp. 274, 319 (2045 Operations with user defined recreational use), <https://www.anaheim.net/DocumentCenter/View/51225/Appendix-C-2-CalEEMod-Calculations>.  
<sup>6</sup> CalEEMod User Guide, pp. 21, 23, 25, 26, 28, 29 (regarding “user defined” land use subtypes, such as the ability to input a user defined commercial, parking, recreational and retail land use subtype), [https://www.caleemod.com/documents/user-guide/01\\_User%20Guide.pdf](https://www.caleemod.com/documents/user-guide/01_User%20Guide.pdf).  
<sup>7</sup> Ibid., at p. 26.





SEIR Comments RE: B-2 Hotel Project  
 November 6, 2025  
 Page 6 of 27

FIGURE 7: SEIR EXCERPT (SEIR GHG Study, PDF pp. 52-53)

**Mobile Sources**

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

FIGURE 8: SEIR EXCERPT (SEIR GHG Study, PDF pp. 188, 261)

5.9. Operational Mobile Sources

###

5.9.2. Mitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/year
Total all Land Uses	3,262	3,262	3,262	1,190,630	21,914	21,914	21,914	7,998,610

FIGURE 9: SEIR EXCERPT (SEIR VMT Study, PDF pp. 6, 11)

**Table A: Project Generated OD VMT/SP**

	Project Baseline	Project Cumulative	Orange County Baseline
Service Population	1,446	1,446	5,784,934
OD VMT	21,914	19,659	146,761,959
OD VMT per service population	15.2	13.6	25.4
Impact Threshold			21.6
Impact?	No	No	

###

	2019	Nickelodeon Hotel (Project)	County of Orange*
Households		-	-
Population		-	3,196,231
Employment		446	1,805,476
Enrollment			783,227
Guests		1,000	
Service Population		1,446	5,784,934
Homebased Work (HBW) VMT		6,823	31,109,803
PA VMT		20,813	135,174,523
OD VMT		21,914	146,761,959
OD VMT per service population		15.2	25.4

O2-9  
 Cont.



SEIR Comments RE: B-2 Hotel Project  
 November 6, 2025  
 Page 7 of 27

**3. VMT ANALYSIS SEEMS TO HAVE ANALYZED A GENERIC HOTEL WITH A MAXIMUM OF 1,000 OVERNIGHT GUESTS.**

The SEIR’s GHG Study relies on VMT modeling under the Orange County Transportation Analysis Model (“OCTAM”). The SEIR’s VMT analysis demonstrates a limited amount of VMTs associated only with the hotel use. For example, the SEIR traffic study claims the Project would generate 3,995 daily trips compared to the prior MND finding of 4,318 daily trips. (*Compare SEIR*, PDF p. 174 with *MND Appendices*, PDF pp. 882.) This may be because the prior MND included consideration of a 600-seat hotel theater, which generated additional daily trips (suggesting VMTs independent of hotel use). (See *MND Appendices*, PDF pp. 881-82, 901-02, 919-20.) Additionally, as mentioned above, the VMT Study assumes a service population limited to 446 employees and 1,000 guests (a total of 1,446), with the latter based on the assumption that there would be two guests for each of the 500 hotel rooms. (See Fig. 9 above; see also *SEIR VMT Study*, PDF pp. 5-6, 11.) Hence, the current VMT Study assumes no other vehicle trips or people accessing the Project Site besides the 446 workers and 1,000 overnight guests.

O2-10

The above approach seems to be a departure from the Disneyland Forward project, which the SEIR cites as another resort/hotel that used OCTAM modeling for its VMT analysis. (*SEIR VMT Study*, PDF p. 4.) The Disneyland Forward VMT analysis considered trips from day guests not staying overnight at onsite hotels,<sup>8</sup> which were expressed as a unique “theme park rates” independent of hotel trip rates,<sup>9</sup> and accounted for in the VMT analysis.<sup>10</sup> These additional theme park VMTs were considered in the Disneyland Forward GHG, VMT, and mitigation analysis.<sup>11</sup>

**4. DAY ACCESS BEYOND JUST 1,000 HOTEL GUESTS SEEMS LIKELY.**

Access from non-overnight hotel guests (and thus greater impacts) is likely. Unlike other Nickelodeon hotel/resorts located in remote international destinations,<sup>12</sup> the Project is proposed in an urban area with relatively easy daily access by personal vehicles (e.g., inducing regional travel). It seems likely that this Project would offer access to non-overnight hotel guests, since nearby theme parks appear to do so (e.g., Disneyland, Knotts Berry Farm, Legoland, etc.). For example, the SEIR cites both the Great Wolf Lodge and Disneyland Forward. (*SEIR*, PDF p. 175; *SEIR VMT Study*,

O2-11

<sup>8</sup> Disneyland, Admission Tickets (offering single day passes), <https://disneyland.disney.go.com/en-ca/admission/tickets/>.

<sup>9</sup> See gen., City of Anaheim, Environmental Documents (providing CEQA documents for DEV2021-00069 Disneyland Forward), <https://www.anaheim.net/876/Environmental-Documents>; Operational Traffic Analysis (Aug. 2023), PDF p. 93, 115, 1603 (1,578 daily trips per parking space including guests and cast members as well as trip rates for other retail / entertainment), <https://www.anaheim.net/DocumentCenter/View/51211/Appendix-J-2-Operational-Traffic-Analysis>.

<sup>10</sup> See e.g., Disneyland Forward Draft SEIR, VMT Section, PDF pp. 37-38, 47-59 (tbls. 5.14-1 & 5.14-2), [https://www.anaheim.net/DocumentCenter/View/51198/0514\\_Transportation](https://www.anaheim.net/DocumentCenter/View/51198/0514_Transportation).

<sup>11</sup> See e.g., Disneyland Forward Draft SEIR, GHG Section, PDF p. 36-39, 44-55 (tbl. 5.7-4), [https://www.anaheim.net/DocumentCenter/View/51191/0507\\_Greenhouse\\_Gas\\_Emissions](https://www.anaheim.net/DocumentCenter/View/51191/0507_Greenhouse_Gas_Emissions); id., VMT Section, PDF pp. 37-38, 47-59 (tbls. 5.14-1 & 5.14-2), [https://www.anaheim.net/DocumentCenter/View/51198/0514\\_Transportation](https://www.anaheim.net/DocumentCenter/View/51198/0514_Transportation).

<sup>12</sup> See Nickelodeon Hotels & Resorts, Destinations (listing three open locations in Dominican Republic, Mexico, Turkey and one location opening 2026 in Orlando, Florida), <https://www.nickresorts.com/destinations>; see also Karisma Hotels, Nickelodeon Hotels & Resorts by Karisma (listing Dominican Republic and Mexico locations), <https://www.karismahotels.com/nickelodeon-hotels-resorts>; <https://www.nickresorts.com/destinations>.

O2-10  
 Cont.

O2-11  
 Cont.



SEIR Comments RE: B-2 Hotel Project  
 November 6, 2025  
 Page 8 of 27

PDF p. 4.) The Great Wolf Lodge is not limited to just overnight hotel guests, and “day pass admission” is offered.<sup>13</sup> Similarly, Disneyland also provides day access to guests who are not staying overnight at onsite hotels.<sup>14</sup>

↑ O2-11  
 Cont.

**5. RECOMMENDATION**

Although smaller than Disneyland, the Nickelodeon-themed attractions at the Project Site offer a unique amusement experience that goes beyond a typical resort hotel. Currently, the SEIR makes a fundamental assumption that onsite amenities are not accessible to non-overnight hotel guests (i.e., no mobile emissions or vehicle trips independent of hotel use). Both the GHG and VMT study assumes a maximum of 1,000 hotel guests, but that assumption is not an enforceable condition of approval. To the extent that the VMT analysis does not adequately account for VMTs generated by non-overnight guests, the concern is that the Project may generate even more GHG emissions and VMTs than analyzed, which may not have been adequately assessed or mitigated. It is recommended that the SEIR either reassess the Project for these independent uses (i.e., as a worst-case scenario with additional mitigation) or make this assumption enforceable via a condition of approval and a project design feature that is explicitly included in the MMRP (discussed infra section E).

O2-12

**B. GHG IMPACTS**

Local 11 was critical of the previous MND’s GHG analysis. The updated SEIR GHG Study estimates the Project will generate 7520.09 metric tons of CO2 equivalent per year (“MTCO2e/yr”). (SEIR, PDF p. 150 [tbl. 4.1-10].) This is significantly greater than the prior estimate of 3,316 MTCO2e/yr. (MND Appendices, PDF p. 76 [tbl. 19].) The current GHG study is an improvement; however, there are a few live issues of concern.

O2-13

**1. LAND USE COMPONENTS NEED TO BE CLARIFIED.**

As fully explained above (supra section A), the SEIR makes a key assumption that all onsite uses would be accessible to “only” hotel guests,<sup>15</sup> which is reflected in the GHG study’s land use assumptions. (SEIR GHG Study, PDF p. 50 [tbl. 2-2], PDF pp. 135-136, 208-209 (CalEEMod Worksheet sections 1.2).) It is unclear if these land use assumptions accurately capture the full scope of emissions from all other uses. It is recommended that either the SEIR make this fundamental assumption enforceable as an explicit project design feature incorporated into the MMRP, or the SEIR analysis should be revised to account for the likelihood of day access from non-overnight hotel guests.

O2-14

///

<sup>13</sup> See Great Wolf Lodge, Day Pass (“Splash into a day of fun with day pass admission to Great Wolf Lodge’s indoor water park”), <https://www.greatwolf.com/southern-california/daypass>; Id., Water Park Day Passes (offering full and half day passes), <https://www.greatwolf.com/southern-california/daypass/booking>.

<sup>14</sup> Disneyland, Admission Tickets (offering single day passes), <https://disneyland.disney.go.com/en-ca/admission/tickets/>.

<sup>15</sup> See e.g., SEIR, PDF p. 52,95 (“Ancillary uses associated with the hotel such as restaurant, meeting rooms, entertainment spaces and health and fitness are included within the hotel building square footage as those uses will only be available to guests of the hotel.” Emphasis added).



SEIR Comments RE: B-2 Hotel Project  
 November 6, 2025  
 Page 9 of 27

**2. ASSUMED CALFEEMOD MITIGATION MEASURES NEED TO BE ENFORCEABLE.**

The CalFEEMod worksheets identify over 20 emission reduction measures. (SEIR GHG Study, PDF pp. 136-137, 209-210 [C-1-A through LL-1].) These measures correlate to CAPCOA mitigation strategies.<sup>16</sup> However, it is unclear to what extent these measures relate to the project design features and mitigation measures listed in the SEIR. (SEIR, PDF pp. 11-37.) It is also unclear whether the SEIR’s project design features and mitigation measures are consistent with the CAPCOA measures referenced, and why other CAPCOA measures were considered for incorporation, which is explained further below (infra section E).

O2-15

**3. ONSITE MITIGATION MEASURES RELATED TO MOBILE AND ENERGY EMISSIONS NEED TO BE PRIORITIZED.**

The SEIR estimates that the unmitigated Project will generate 8,124 MTCO<sub>2</sub>e/yr, which will be reduced through mitigation (pre-carbon offsets) by roughly 7.4 percent (i.e., 7520 MTCO<sub>2</sub>e/yr). (Compare SEIR, PDF p. 103 [tbl. 4.1-5] with PDF p. 150 [tbl. 4.1-10].) The SEIR also states that, following implementation of “all feasible construction and operational (onsite)” mitigation measures, the applicant will purchase and retire carbon offsets. (Id., at PDF p. 151.) This is commendable and represents a notable improvement over the prior MND suite of mitigation measures. However, there is a concern that feasible onsite mitigation measures are being left off the table, which should be incorporated prior to resorting to offsets. Over 95 percent of the Project’s emissions are from mobile sources (32.9%) and energy (i.e., 62.8%, respectively). (Id., at PDF p. 150 [tbl. 4.1-10].) Thus, feasible mitigation measures targeting these sources should be prioritized before utilizing carbon offsets, which is explained further below (infra section E).

O2-16

**4. CARBON OFFSETTING IS COMMENDABLE, BUT SHOULD BE UTILIZED ONLY AFTER ONSITE MEASURES HAVE BEEN EXHAUSTED.**

As currently proposed, carbon offsets for operations can be purchased either in lump or on an annual basis (i.e., MM-GHG-15). (SEIR, PDF pp. 152-153.) The number of offsets is based on the GHG estimates, which may be underestimated due to the (likely incorrect) assumption that non-overnight guests will not visit the Site (discussed above). To the extent traffic generation may have been underestimated, additional data will become available once the Project begins operations (e.g., traffic counts, admission records, other site-specific data regarding overnight versus non-overnight guests, updated traffic modeling, etc.). Additionally, over a 30-year Project life, further onsite mitigation measures may become feasible, reducing the need for offsets and minimizing impacts. Notwithstanding good-faith efforts, there is the potential for impacts that can be meaningfully mitigated. To the extent the level of impact may be speculative at this time, this can be mitigated via an annual reporting requirement whereby the applicant can provide the City with updated information relevant to both the Project’s GHG/VMT impacts and operational assumptions (e.g., daily traffic trips, admissions from overnight versus non-overnight guests, VMT travel profile, effectiveness of TDM and mitigation measures, etc.) This would ensure not only compliance with MM-GHG-15, but also other project design features and mitigation measures that should be considered in the MMRP (infra section E), and provide an opportunity to assess the effectiveness of current measures and/or the need to supplement them with alternative feasible measures.

O2-17

<sup>16</sup> See CalFEEMod User Guide, PDF p. 16, 55, [https://www.caleemod.com/documents/user-guide/01\\_User\\_Guide.pdf](https://www.caleemod.com/documents/user-guide/01_User_Guide.pdf); see also CAPCOA 2021 Handbook, Appendix E Measure Index, [https://www.caleemod.com/documents/handbook/appendices/appendix\\_e.pdf](https://www.caleemod.com/documents/handbook/appendices/appendix_e.pdf).



SEIR Comments RE: B-2 Hotel Project  
November 6, 2025  
Page 10 of 27

**5. RECOMMENDATION**

In summary, it is recommended that the issues mentioned above be addressed in a revised SEIR, which should include consideration of additional mitigation measures (discussed further below in section E).

02-18

**C. VMT IMPACTS**

CEQA requires analysis of VMT traffic impacts related to a project. (See *Kings County Farm Bureau v. Hanford* (1990) 221 Cal.App.3d 692, 727.) In particular, CEQA requires analysis of project-related traffic impacts in a manner that does not minimize cumulative impacts. (See e.g., *Cleveland III*, 17 Cal.App.5th at 444-445 [on remand, traffic analysis based on methodology with known data gaps that underestimated traffic impacts necessarily prejudiced informed public participation and decisionmaking]; *Kings County Farm Bureau*, supra at 718, 727 [rejecting determination that less than one percent to area emissions was less than significant because analysis improperly focused on the project-specific impacts and did not properly consider the collective effect of the relevant projects on air quality]; *Save Cuyama Valley v. County of Santa Barbara* (2013) 213 Cal.App.4th 1059, 1072 [upheld the use of same thresholds for immediate and cumulative impacts when its application was “undoubtedly more stringent cumulative-impact threshold”]; *Al Larson Boat Shop, Inc. v. Board of Harbor Comm’rs*, (1993) 18 Cal.App.4th 729, 749 [upheld where cumulative impacts were not minimized or ignored].) The relevant inquiry is not only the relative amount of increased traffic that the Project will cause but whether any additional amount of Project traffic should be considered significant in light of the existing traffic conditions. (See *Los Angeles Unified School District v. City of Los Angeles* (1997) 58 Cal.App.4th 1019, 1025.)

02-19

Previously, Local 11 was critical of the prior MND, which failed to provide a VMT analysis based on the presumption that VMT impacts would be less than significant because the Project Site is within a transportation priority area (“TPA”). (MND Appendices, PDF p. 897, 964, 967, 990.) Here, the SEIR provided a VMT Study, which found impacts warranting mitigation. (SEIR, PDF pp. 173-174, 177, 179-180.) This is an improvement to the MND’s prior traffic analysis. However, there are a few live issues of concern.

**1. OTHER LAND USES SHOULD BE CONSIDERED.**

As fully explained above (supra section A), the SEIR makes a key assumption that all onsite uses would be accessible to “only” hotel guests,<sup>17</sup> which is reflected in the SEIR’s VMT Study (i.e., only 3,995 daily trips, 21,914 VMTs, service population limited to 446 employees and 1,000 guests). (See Fig. 9 above.) It is recommended that the SEIR make this fundamental assumption enforceable as an explicit project design feature incorporated into the MMRP or that the SEIR analysis be revised to account for the likelihood of day access from non-overnight hotel guests.

02-20

///

<sup>17</sup> See e.g., SEIR, PDF p. 52,95 (“Ancillary uses associated with the hotel such as restaurant, meeting rooms, entertainment spaces and health and fitness are included within the hotel building square footage as those uses will only be available to guests of the hotel.” Emphasis added);



SEIR Comments RE: B-2 Hotel Project  
November 6, 2025  
Page 11 of 27

**2. ASSUMPTIONS REGARDING GUEST SERVICE POPULATION MAY NOT BE ACCURATE.**

As mentioned above, the VMT Study estimates that the guest service population would be limited to 1,000 guests. (SEIR VMT Study, PDF pp. 5, 11.) The VMT study used the Great Wolf Lodge as a comparison, but it does not provide the underlying data to independently verify its occupancy levels. Nor does it explain why other data was not provided, such as data relevant to the potential use by non-overnight guests. It is recommended that the SEIR clarify whether the 1,000-guest service population is consistent with the Great Wolf Lodge and other comparable projects.

02-21

**3. ASSUMPTIONS REGARDING EMPLOYEE SERVICE POPULATION MAY NOT BE ACCURATE.**

The VMT Study estimates that the employee service population would be 446 employees, which seems inflated, and in turn may make the Project's VMTs appear to require less mitigation. Below are several issues with the VMT service population used in the SEIR:

- The estimate is based on a ratio (i.e., 1,550 sf per employee) applied against a purported 691,693 sf of commercial area. (SEIR, PDF p. 176; SEIR VMT Study, PDF p. 4, 10.) This is based on a ratio from the San Diego Association of Governments ("SANDAG") Activity Based Model (ABM 2+) (id., at PDF p. 10), for which the SEIR does not provide a hyperlink or other means for the SEIR reader to verify the rate. 691,693 sf seems to be a reference to the prior MND's "total building area," which includes over 300,000 sf of parking, and where the "resort hotel" was estimated at 289,891 - 379,366 sf (depending on inclusion of ballrooms, meeting spaces, arcade, back of house, and other amenities). (See Figs 2 & 5 above; see also MND Appendices, PDF pp. 8, 34, 774.) The current SEIR seems to suggest that the total building area includes 718,919 sf with "hotel and amenities" amounting to 417,233 sf. (See Fig. 1 above; see also SEIR, PDF pp. 52, 176.) Thus, the employee service population estimate might not be accurate. This underscores the need to provide precise project components and square footage (discussed supra section A).
- Also, it is unreasonable to assume parking areas (301,686 sf) would generate one employee per 1,550 square feet (i.e., approximately 194 employees).
- The VMT study cites a 0.8 to 1.2 employees per hotel room rate, purportedly based on an "industry source" from a "city-of-hotel.com" website that referenced the "World Tourist Organization" ("WTO") without providing any documentation or material explaining how this recommendation was established. The WTO seems to now be called the UN Tourism, which does not readily provide documentation or resources on the topic (based on a search). Additionally, no facts are provided to confirm the purpose and basis of this 0.8-1.2 recommendation, nor is it demonstrated that it is relevant to the current Project, the Southern California region, or has any relevance to a VMT/traffic analysis. There is a lack of substantial evidence to support this WTO rate. In contrast, the City of Los Angeles VMT calculator employs an employee generation rate of one employee per two rooms (i.e., 0.5 employees per room), based on the Institute of Transportation Engineers ("ITE") land use code 310 and SANDAG data, for the purpose of assessing VMT/traffic impacts.<sup>18</sup>

02-22

<sup>18</sup> LADOT (May 2020) City of Los Angeles VMT Calculator Documentation, pp. 11, 15, [https://ladot.lacity.gov/sites/default/files/documents/vmt\\_calculator\\_documentation-2020.05.18.pdf](https://ladot.lacity.gov/sites/default/files/documents/vmt_calculator_documentation-2020.05.18.pdf).



SEIR Comments RE: B-2 Hotel Project  
November 6, 2025  
Page 12 of 27

When corrected for the aforementioned issues, it appears that the Project’s employee service population is significantly lower. Based on square footage referenced in the MND and SEIR, the hotel resort (including the various amenities) would be approximately 289,891 - 417,233 sf with an estimated employee service population of 187 - 270 (based on purported SANDAG rate of 1,550 sf per employee). This estimate aligns with the City of Los Angeles’ estimate of 0.5 employees per room, or 250 employees for the proposed 500-room Project.

In sum, the use of 466 employees may understate the level of VMT impact as it relates to the Project’s VMT/employee impacts (15.3 VMT/employee, compared to the 14.6 threshold). (SEIR VMT Study, PDF p. 4, 10). This may, in turn, understate the level of mitigation required from mitigation measures TRA-1 and TRA-2. (SEIR, PDF pp. 177-178), which may warrant further mitigation. It is recommended that the SEIR clarify the above issues and address them with additional mitigation (discussed infra section E).

**4. VMT ANALYSIS MAY NOT BE CONSISTENT WITH CITY’S VMT GUIDELINES.**

The SEIR VMT study utilizes the OCTAM model. (SEIR VMT Study, PDF p. 3.) There are several assumptions that require clarification.

- The VMT study claims the hotel is similar to retail because some hotel guests may stay at other hotels. (Id., at PDF p. 4.) However, while this may be true for business and/or local-serving hotels, the SEIR states that the Project is “not” a local-serving use.<sup>19</sup> The themed amenities make the Project distinctly unique from a standard hotel. The VMT study seemingly concedes that the Project is expected to generate occupancy above the average for a business or tourist hotel in the City. (Id.)
- The VMT study claims that the City boundary is appropriate, despite being near the City border, due to various factors, including that guests are anticipated to visit the Site with the specific intent to enjoy the Project’s amenities, and that the Project is unlike a traditional business hotel. (Id., at PDF p. 4.) This explanation does not address why the City boundary is more appropriate than a larger boundary to prevent an “artificially truncated” VMT review.<sup>20</sup> The Project includes a significant new regional destination that is likely to attract patrons and VMTs well beyond the City and, thus, should be considered in the analysis to assess the Project’s impact on “change travel behavior in the region.”<sup>21</sup>
- Due to the uniqueness of the operations, the VMT study created a new TAZ (i.e., TAZ 386), which included 1,000 guests and 446 employees. (Id., at PDF p. 5.) The VMT study includes an OD VMT analysis that consists of both hotel guests and employees in the service population. (Id., at PDF p. 6.) It states that excluding one of the contributors would “inappropriately skew the conclusions.” However, the City’s VMT Guidelines appear to limit service population to population (i.e., residents) plus employment (i.e., workers) and do not include hotel guests.<sup>22</sup> While the City’s VMT guidelines mention circumstances where “a separate TAZ would be created to contain the project land uses[.]”<sup>23</sup> it does not state that

02-22  
Cont.

02-23

<sup>19</sup> SEIR, PDF p. 174; City VMT Guidelines, PDF p. 18 (“local serving hotels (e.g., non-destination hotels)”);

<sup>20</sup> City VMT Guidelines, PDF p. 20 (fn. 5).

<sup>21</sup> Ibid., at PDF p. 19.

<sup>22</sup> Ibid., at PDF pp. 16, 17, 20.

<sup>23</sup> Ibid., at PDF p. 19.



SEIR Comments RE: B-2 Hotel Project  
November 6, 2025  
Page 13 of 27

the inclusion of hotel guests is permissible. Hence, the SEIR may not be comparing apples to apples when it presents the Project's OD VMT per service population (15.2 and 13.6) to the Orange County threshold (21.6). (SEIR, PDF p. 177 [tbl. 4.2-1].)

- The City's VMT Guidelines state that model outputs must include reasonableness checks of production and attractions to ensure the proposed development's effect is accurately captured.<sup>24</sup> This may include estimates matching "traditional model process" or custom processes for "special generator trips (airport, seaport, stadium, etc.)."<sup>25</sup> Here, the VMT study cites Disneyland Forward as a comparable resort/hotel use in the County, which included custom rates based on the theme-park-related uses. It would seem prudent to take a similar approach here to provide a check. This would serve to verify whether the VMT's modeling is accurate, and also serve as an objective performance metric to implement MM-GHG-5 (Guest Vehicle Trip Reductions) (discussed infra section E).

**5. QUALITATIVE ANALYSIS WITH GENERAL PLAN PROVISIONS IS CURSORY.**

Like GHG qualitative analysis, the SEIR's VMT analysis referenced various transportation policies and strategies related to TDM and VMTs. (SEIR, PDF pp. 170-172.) However, there are numerous TDM measures that are not incorporated, whether to minimize VMT impacts or GHG emissions from mobile sources. This seems to leave off the table mitigation measures that would be relevant to the Project's qualitative consistency with numerous traffic related General Plan provisions, including but not limited to those listed in the City's Air Quality Element (e.g., AQ-IMP-1B, AQ-IMP-1C, Policy AQ-2.2, AQ-IMP-2A, Goal AQ-3, Policy AQ-3.1, Policy AQ-3.2, AQ-IMP-3C);<sup>26</sup> and Circulation Element (Goal CIR-4, Policy CIR-4.2, CIR-IMP-4A, Goal CIR-5, Policy CIR-5.1, -5.5, CIR-IMP-5A, -5B, -5C).<sup>27</sup>

**6. RECOMMENDATION**

In sum, it is recommended that the abovementioned issues be addressed in a revised SEIR, including consideration of additional mitigation (discussed further below infra section E).

**D. PROJECT WITH HOUSING ALTERNATIVE SHOULD HAVE BEEN CONSIDERED**

Under CEQA, the core of an EIR requires a lead agency to select a reasonable range of alternatives for evaluation guided by a clearly written statement of objectives. (See *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564-65; see also CEQA Guidelines § 15124(b).) It is the lead agency's affirmative duty to approve a project only after "meaningful consideration of alternatives and mitigation measures." (*Mountain Lion Foundation v. Fish & Game Com.* (1997) 16 Cal.4th 105, 134.) This duty cannot be defeated by defining objectives too narrowly or too broadly or artificially limiting the agencies' ability to implement reasonable alternatives by prior contractual commitments. (See e.g. *City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1447; *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 736.) Instead, a "reasonable range of alternatives" should be: (i) "capable of being accomplished in a successful manner" (Pub. Res. Code § 21061.1); (ii) "attain most of the basic objectives of the project" (*Sierra*



<sup>24</sup> Ibid.  
<sup>25</sup> Ibid., at PDF p. 31  
<sup>26</sup> City General Plan, [Air Quality Element](#), pp. 8-2 – 8-6.  
<sup>27</sup> City General Plan, [Circulation Element](#), pp. 5-34 – 5-35.



SEIR Comments RE: B-2 Hotel Project  
 November 6, 2025  
 Page 14 of 27

*Club v. County of Napa* (2004) 121 Cal.App.4th 1490, 1509 [citing CEQA Guidelines § 15126.6(a) and (f)]; and (iii) achieve the project’s “underlying fundamental purpose” (*In re Bay-Delta* (2008) 43 Cal.4th 1143, 1164-1165 [citing CEQA Guidelines § 15124(b)]).

↑  
 02-26  
 Cont.

Here, the SEIR failed to consider the Project (i.e., resort/theme-park venue) with at least some levels of affordable housing on Site, which is recommended for the following reasons.

**1. SEIR DOES NOT ADDRESS WHY A PROJECT WITH SOME HOUSING IS INFEASIBLE.**

The SEIR’s alternative analysis considered only a no-project alternative and a reduced project alternative. (SEIR, PDF pp. 38-39.) The SEIR rejected a mixed-use development alternative because the majority of the Site is zoned IW. (Id., at PDF p. 199-200.) However, the Site is designated International West Mixed Use (“IW”) and zoned PUD or single-family residential (R-1-7). (Id., at PDF pp. 50, 59-61.) IW specifically allows and encourages a mix of uses, including residential (i.e., up to 60 dwelling units per acre) or greater.<sup>28</sup> The SEIR acknowledges that a “residential alternative is anticipated to result in fewer environmental impacts than the proposed Project because the Project site is in proximity to transit and would likely screen out from a VMT analysis, and VMT impacts would be less than significant. The reduction in vehicle trips related to VMT would also lead to a decrease in GHG emissions.” (Id., at PDF p. 198.) While an “exclusively residential alternative” would not likely serve the majority of project objectives (id.), there is no discussion of a mixed-use alternative that incorporates at least some level of housing (particularly affordable housing) into the Project. Such an alternative would arguably minimize GHG/VMT impacts while also serving the Project’s underlying fundamental purpose. It is recommended that the SEIR consider such an alternative.

↑  
 02-27

**2. AFFORDABLE HOUSING IS CONSISTENT WITH APPLICABLE POLICIES.**

The SEIR’s GHG qualitative analysis references various policies and strategies related to encouraging *mixed-use* development and *housing*, which the SEIR claims are either inapplicable or have no conflict because the Project involves an infill Project Site consistent with the General Plan. (SEIR, PDF pp. 109-111 [Connect SoCal 2024 policies 32, 35-42], PDF pp. 122-123 [CARB 2022 Scoping Plan], PDF pp. 125-143 [General Plan Nos. SAF-10.10].) However, the Project is an entirely commercial development, and the SEIR fails to consider how failure to include affordable housing is inconsistent with applicable policies, such as the following:

↑  
 02-28

**a. CAPCOA Measures**

Adding affordable housing to the Project can minimize GHG emissions and VMTs. This is consistent with *CAPCOA measures T-1* (increase residential density) and *measure T-4* (Integrate Affordable and Below Market Rate Housing).<sup>29</sup>

///

<sup>28</sup> SEIR, PDF pp. 50, 193; see also City General Plan, *Housing Element*, PDF pp. 49 (tbl. 12-17), 115 (Tbl. 12-43).

<sup>29</sup> CAPCOA Handbook, pp. 31, 70, 95, [https://www.caleemod.com/documents/handbook/full\\_handbook.pdf](https://www.caleemod.com/documents/handbook/full_handbook.pdf).



SEIR Comments RE: B-2 Hotel Project  
 November 6, 2025  
 Page 15 of 27

**b. SCAG RTP/SCS Policies**

SCAG's 2024 RTP/SCS (Connect SoCal)<sup>30</sup> has four primary goals (i.e., mobility, communities, environment, economy) (pp. 9-12), each with respective subgoals (p. 85) and categories of policies (RTP/SCS, pp. 88-112), which totals nearly 90 regional planning policies (pp. 114-121), and other implementation strategies where local governments play a partner/supporting role (pp. 124-135). Providing affordable and sustainable housing is a major cross-cutting theme in the 2024 RTP/SCS (pp. 8, 9, 10, 27, 28, 54, 56, 66, 100, 106, 112, 117, 135, 193, 197), including but not limited to the following goals and policies (emphasis added):

<p><b>Goal: Communities: Develop, connect and sustain communities that are livable and thriving</b></p> <ul style="list-style-type: none"> <li>- Sub-goal: Create human-centered communities in urban, suburban and rural settings to increase mobility options and <i>reduce travel distances</i></li> <li>- Sub-goal: Produce and preserve diverse housing types in an effort to <i>improve affordability, accessibility and opportunities for all households</i></li> </ul>
<p><b>Category: Housing the Region:</b> Providing sufficient housing opportunities throughout the region will require a range of strategies and methods to increase both the production of and access to a <i>wide range of housing types.</i></p>
<p><b>Regional Planning Policies:</b></p> <ul style="list-style-type: none"> <li>32. Encourage housing development in areas with access to important resources and amenities (economic, educational, health, social and similar) to <i>further fair housing access and equity</i> across the region</li> <li>33. Support local, regional, state and federal efforts to <i>produce and preserve affordable housing</i> while meeting additional housing needs across the region</li> <li>34. Prioritize communities that are vulnerable to displacement pressures by supporting community stabilization and <i>increasing access to housing that meets the needs</i> of the region</li> <li>35. Promote innovative strategies and partnerships to increase homeownership opportunities across the region with an <i>emphasis on communities that have been historically impacted</i> by redlining and other systemic barriers to homeownership for people of color and other marginalized groups</li> <li>36. Advocate for and support programs that emphasize reducing housing cost burden (for renters and homeowners), with a focus on the <i>communities with the greatest needs</i> and vulnerabilities</li> <li>37. Support efforts to increase housing and services for people experiencing homelessness across the region</li> </ul> <p><b>Communities Implementation Strategies:</b></p> <ul style="list-style-type: none"> <li>[a]. Support Provide technical assistance for jurisdictions to complete and implement their housing elements and support local governments and Tribal Entities to <i>advance housing production</i></li> <li>[b]. Identify and pursue partnerships at the local, regional, state and federal levels to align utility, transit and infrastructure investments with housing development and <i>equitable outcomes</i> across the region</li> <li>[c]. Research community stabilization (anti-displacement) resources that can be utilized to address <i>displacement pressures</i>, such as preservation and tenant protections for communities across the region and Affirmatively Further Fair Housing</li> </ul>

02-29

<sup>30</sup> 2024 RTP/SCS, <https://scag.ca.gov/sites/default/files/2024-05/23-2987-connect-socal-2024-final-complete-040424.pdf>.



SEIR Comments RE: B-2 Hotel Project  
 November 6, 2025  
 Page 16 of 27

**c. General Plan Provisions**

Promoting mixed-use development is consistent with various General Plan provisions, such as those listed in the Safety Element (e.g., Policies SAF-10.10 and SAF-10.12); Land Use Element (e.g., Goal LU—1, Policies LU-1.1, 1.2, 1.3, 1.7, 1.8); Community Design Element (e.g., CD-IMP-1A); Circulation Element (e.g., Policy CIR-4.1, -4.2, -4.3, CIR-IMP-4A); Economic Development Element (e.g., Policy ED-3.7, ED-IMP-3C, ); Air Quality Element (e.g., AQ-5, Policy AQ-5.1, 5.3, 5.6, AQ-IMP-5A); and the Housing Element (e.g., Goal H-2, Policy H-2-1, H-3.3, H-3.7).<sup>31</sup>

02-30

**d. Local Action Under CARB Scoping Plan**

There are numerous measures that CARB urges for local action, which are included in the 2022 Scoping Plan Appendix D (i.e., Local Action), building upon the prior 2017 Scoping Plan Appendix B (i.e., Local Action). Among the strategies mentioned are mixed-use development and affordable housing.<sup>32</sup>

02-31

It is recommended that the SEIR consider the Project’s consistency with the abovementioned measures.

**3. SEIR LACKS A JOB-HOUSING BALANCE ANALYSIS.**

SCAG’s RTP/SCS and SB-743 focus on improving jobs-housing balance, which is relevant to both the SEIR’s GHG and VMT analysis. (SEIR, PDF pp. 168, 176.). However, the SEIR does not include a jobs-housing analysis, which is only tangentially discussed in the context of growth-inducing impacts. (Id., at PDF p. 193-195.) Generally, adding more jobs in a job-rich or, conversely, housing-poor area can have an adverse impact on a community’s jobs-to-housing balance. Similarly, the quality of jobs can also impact the jobs-housing fit (“JHFit”), where an imbalance may exist between a city’s total number of low-wage workers and the number of homes affordable to them. A development that increases the demand for affordable housing can exacerbate an existing housing impact, especially where a community may have a current unmet affordable housing need under its Regional Housing Needs Assessment (“RHNA”) allocation.

02-32

It is recommended that the SEIR consider the Project’s impact on induced housing demand and its effect on the City’s jobs-to-housing balance and JHFit. This is reflected throughout a variety of qualitative policies applicable to the project’s GHG and traffic (mentioned above).

///

<sup>31</sup> City General Plan, [Safety Element](#), p. 11-20; id., [Land Use Element](#), PDF pp. 2-36 – 2-44; [Community Design Element](#), p. 3-19; id., [Circulation Element](#), pp. 5-34; id., [Economic Development Element](#), pp. 4-5; id., [Air Quality Element](#), pp. 8-4 – 8-5; id., [Housing Element](#), PDF pp. 12-153 – 12-154.

<sup>32</sup> CARB 2022 Scoping Plan, Appendix D (Local Action), pp. 6, 7, 12 (fn. 26), 20, 23, <https://ww2.arb.ca.gov/sites/default/files/2022-11/2022-sp-appendix-d-local-actions.pdf>; CARB 2017 Scoping Plan, Appendix B (Local Action), PDF pp. 6, [https://ww3.arb.ca.gov/cc/scopingplan/2030sp\\_appb\\_localaction\\_final.pdf](https://ww3.arb.ca.gov/cc/scopingplan/2030sp_appb_localaction_final.pdf).



SEIR Comments RE: B-2 Hotel Project  
November 6, 2025  
Page 17 of 27

**4. HCD DATA SHOWS COMPELLING NEED FOR AFFORDABLE UNITS IN THE CITY.**

The SEIR does not address the City's current demand for affordable housing under its RHNA allocation. Currently, the City's RHNA allocation under the 6<sup>th</sup> Housing Element cycle is 19,168 units by 2029, with approximately 53% of these units being affordable (i.e., 10,178 units at moderate income levels or lower).<sup>33</sup> Based on the California Housing and Community Development ("HCD") Annual Progress Report portal, which includes City data submitted through 2024, Garden Grove is 37.5 % through its 6<sup>th</sup> Housing Cycle, but has attained only 1.15% of its affordable units (i.e., 118 of 10,178) as compared to achieving 14.8% of its above moderate income allocation.<sup>34</sup> This suggests that the City is behind on its existing affordable housing allocation, which this Project may exacerbate. It is recommended that the SEIR consider the Project's impact on affordable housing and its consistency with various housing policies (e.g., those mentioned above) as well as the Project's consistency with SB 166 and Housing Element Program 8 (no net loss).<sup>35</sup>

02-33

**5. LACK OF HOUSING IS RELEVANT TO OVERRIDING BENEFITS**

To the extent that the City may consider overriding benefits, it should have the ability to consider what mitigation/benefits are being left off the table, such as a Project alternative that includes some level of affordable housing. Under CEQA, when approving a project that will have significant environmental impacts not fully mitigated, a lead agency must adopt a "statement of overriding considerations," finding that the Project's benefits outweigh its environmental harm. (Pub. Res. Code § 21081(b); see also CEQA Guidelines § 15043.) An overriding statement expresses the larger, more general reasons for approving the Project, such as the need to create new jobs, provide housing, generate taxes, and the like.<sup>36</sup> It must fully inform and disclose the specific benefits expected to outweigh environmental impacts, supported by substantial evidence. (See CEQA Guidelines §§ 15043(b) & 15093(b).<sup>37</sup>) However, an agency may adopt a statement of overriding considerations *only after* it has imposed all feasible mitigation measures to reduce a project's impact to less than significant levels. (See CEQA Guidelines §§ 15091 & 15126.4.) Hence, decisionmakers may not approve a project when feasible mitigation measures can substantially lessen or avoid such impacts. (See e.g., Pub. Res. Code § 21002; CEQA Guidelines § 15092(b)(2).) Similarly, additional overriding considerations may be necessary to adequately address those additional impacts that the SEIR underestimates.

02-34

**6. RECOMMENDATION**

For the reasons discussed above, it is recommended that the SEIR analyze a Project alternative that includes some level of affordable housing onsite, whether as a form of mitigation or alternative.

02-35

///

<sup>33</sup> City General Plan, *Housing Element*, PDF p. 39 (tbl. 12-16).

<sup>34</sup> HCD, Annual Progress Reports - Data Dashboard and Downloads (search Garden Grove, sheets 10, 12, 13 of 18), <https://www.hcd.ca.gov/housing-open-data-tools/apr-dashboard>.

<sup>35</sup> City General Plan, *Housing Element*, PDF pp. 170, 178-180, 200.

<sup>36</sup> See e.g., *Concerned Citizens of S. Central LA v. Los Angeles Unif. Sch. Dist.* (1994) 24 Cal.App.4th 826, 847.

<sup>37</sup> See also *Sierra Club v. Contra Costa County* (1992) 10 Cal.App.4th 1212, 1222-1223.



SEIR Comments RE: B-2 Hotel Project  
November 6, 2025  
Page 18 of 27

**E. ADDITIONAL MEANINGFUL MITIGATION MEASURES ARE AVAILABLE**

Under CEQA, the discussion of mitigation is a “core” part of a CEQA analysis. (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564-65; see also CEQA Guidelines § 15124(b).) CEQA requires lead agencies to craft non-illusory mitigation measures that will be enforceable.<sup>38</sup> Here, the SEIR acknowledges significant GHG impacts, which can be further mitigated through modifications to the current MMRP (as discussed below).

02-36

**1. PROJECT DESIGN FEATURES SHOULD BE EXPLICITLY INCORPORATED INTO THE MMRP.**

CEQA defines mitigation measures broadly (e.g., avoiding, minimizing, rectifying, reducing, eliminating, or compensating impacts). (CEQA Guidelines § 15370.) Incorporating mitigation measures into the description of the project, and then basing a conclusion of less-than-significant impacts in part on those measures, can run afoul of CEQA.<sup>39</sup>

Here, the SEIR identifies various project design features for construction and operations (i.e., PDFs 4, 5, 8, 10, 11, 12, 21, 27). (SEIR, PDF pp. 11-13, 53, 99-101.) These seem to be carried over from the prior MND. (MND, PDF pp. 17-20 [PDF-1 through PDF-26]; MND Appendices, PDF 38-39, 67-70 [DF-1 through DF-12].) A variety of these prior MND project design features remain relevant to lessen the Project’s emission and VMT impacts (i.e., PDF-1 through PDF-12, PDF-21). (Id.) For example, the SEIR states that these project design features are qualitative/supporting measures and not used for “quantifying” GHG emissions. (SEIR, PDF pp. 11, 99.) Additionally, these project design features directly serve to minimize potential emissions and impacts even though the SEIR does not take credit for them.<sup>40</sup> Also, many of these project design features are similar to CAPCOA measures included as part of the SEIR’s emissions modeling under CalEEMod to lessen the Project’s GHG emissions (i.e., measures C-1-A through LL-1). (SEIR GHG Study, PDF pp. 136-137, 209-210.<sup>41</sup>) Similarly, these project design features are cited to establish consistency with various

02-37

<sup>38</sup> See e.g., *City of Maywood v. Los Angeles Unified School Dist.* (2012) 208 Cal.App.4th 362, 407; *Concerned Citizens of Costa Mesa, Inc. v. 32<sup>nd</sup> Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 935 (enforceable performance standards “ensure the integrity of the process of decision making by precluding stubborn problems or serious criticism from being swept under the rug.”); *Lincoln Place Tenants Ass’n v. City of Los Angeles* (2005) 130 Cal.App.4th 1491, 1508 (“Mitigating conditions are not mere expressions of hope.”); *Federation of Hillside & Canyon Ass’ns v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261 (“feasible mitigation measures will actually be implemented as a condition of development.”); *Oro Fino Gold Mining Corp. v. County of El Dorado* (1990) 225 Cal.App.3d 872, 884 (“There cannot be meaningful scrutiny (of an environmental review document) when the mitigation measures are not set forth at the time of project approval.”).

<sup>39</sup> See *Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645, 656 [“avoidance, minimization and/or mitigation measures, ... are not ‘part of the project.’ ... By compressing the analysis of impacts and mitigation measures into a single issue, the EIR disregards the requirements of CEQA.”].

<sup>40</sup> See e.g., SEIR, PDF pp. 102 (“As noted in Section 4.1.5, the Project includes PDFs for construction that would potentially reduce GHG emissions. The Project’s PDFs include many of the best management practices for reducing GHG emissions from construction. Specifically, PDF-4, PDF-5, and PDF-10, would encourage more efficient fuel consumption and PDF-8 would establish electricity supply to the Project site for use of electric-powered equipment instead of diesel fueled equipment. Given the nature of those PDFs and to conservatively analyze the GHG emissions, the analysis does not take credit for any reductions in the Project’s GHG emissions that may be attributable to those PDFs.” Emphasis added.)

<sup>41</sup> See CalEEMod User Guide, PDF p. 16, 55, [https://www.caleemod.com/documents/user-guide/01\\_User\\_Guide.pdf](https://www.caleemod.com/documents/user-guide/01_User_Guide.pdf); see also CAPCOA 2021 Handbook, Appendix E Measure Index, [https://www.caleemod.com/documents/handbook/appendices/appendix\\_e.pdf](https://www.caleemod.com/documents/handbook/appendices/appendix_e.pdf).



SEIR Comments RE: B-2 Hotel Project  
 November 6, 2025  
 Page 19 of 27

plans in the SEIR's qualitative analysis.<sup>42</sup> Furthermore, as discussed above (supra section A), the SEIR's analysis is based on a fundamental assumption that a maximum of 1,000 guests would access the Site.

In sum, the failure to implement these project design features would likely lead to greater emissions and affect the basis of the SEIR's impact analysis. Therefore, it is recommended that the SEIR clarify to what extent MND/SEIR project design features will be incorporated into the Project if approved. Additionally, all project design features should be included as an explicit condition of approval *and* added to the SEIR's MMRP. (SEIR, PDF pp. 15-37.) This also should include fundamental assumptions as enforceable project design features (i.e., the SEIR's assumption that only overnight hotel guests will have access to the Project Site amenities).

**2. ADDITIONAL MITIGATION IS AVAILABLE**

The Project includes various mitigation measures (i.e., MM-GHG-1 through TRA-2). (SEIR, PDF pp. 11-37.) These are similar but not entirely akin to various CAPCOA measures.<sup>43</sup> While the current mitigation measures are commendable, additional modifications and enhancements seem warranted for the following reasons, grouped by categories of measures.

**a. Construction-Related Measures**

Currently, SEIR includes several mitigation measures related to construction emissions (i.e., MM-GHG-1, MM-GHG-2, MM-GHG-3). (SEIR, PDF pp. 15, 143-144.) This may be inadequate for the following reasons:

- i. The SEIR and MND include various construction-related project design features. (SEIR, PDF pp. 11-13 [PDFs 4, 5, 8, 10]; MND, PDF pp. 17-20 [PDF-1 through PDF-10].) These are similar to CAPCOA measures assumed in the SEIR's GHG study CalEEMod worksheets, including *CAPCOA measures C-2* (Limit Heavy-Duty Diesel Vehicle Idling) and *CAPCOA measures C-5* (Use Advanced Engine Tiers).<sup>44</sup> (SEIR GHG Study, PDF pp. 136-137, 209-210.) Therefore, it is recommended that all project design features be explicitly included in the MMRP. It is also recommended that construction engines specify the use of "Tier 4 final" engines (if not cleaner) to the fullest extent feasible.<sup>45</sup>
- ii. Issues related to MM-GHG-1 (Electric Construction Equipment) & MM-GHG-2 (Construction Office Energy Efficiency):
  - These measures appear to be limited to generators, cranes, air compressors, and temporary construction field offices. It is unclear why it is limited to just these construction components.

<sup>42</sup> See e.g., SEIR, PDF pp. 103, 113, 114, 118, 121, 126, 131, 135, 136, 137 (GHG-2 impact analysis citing "PDFs" to find consistency and/or no conflict with SCAG's RTP/SCS (Connect SoCal), Garden Grove General Plan.)

<sup>43</sup> See CAPCOA Handbook, PDF pp. 46-47 (Fig. 3-1), 62-66 (Tbl. 3-1).

<sup>44</sup> See CAPCOA User Guide, pp. 52.

<sup>45</sup> Ibid., at p. 35 (regarding off-road equipment).



SEIR Comments RE: B-2 Hotel Project  
November 6, 2025  
Page 20 of 27

- This measure is similar to the *CAPCOA measure C-1-A* (Use Electric or Hybrid Powered Equipment) assumed in the CalEEMod worksheets. (SEIR GHG Study, PDF pp. 136-137, 209-210.) Measure C-1-A requires the use of electric- or hybrid-powered “construction equipment over conventional diesel-fueled counterparts,” which is not limited to the abovementioned pieces of equipment and office. It is recommended that MM-GHG-1 be amended to require implementation to the fullest extent feasible, including but not limited to the construction equipment already included.
- *CAPCOA measure C-1-B* (Use Cleaner-Fuel Equipment) requires the use of “cleaner-fueled construction equipment over conventional diesel- or gasoline-fueled counterparts.” It is recommended that this be incorporated into this measure.

02-39  
Cont.

iii. Issues related to MM-GHG-3 (Construction Debris Recycling):

- The Site is largely vacant, and the measure is geared towards debris, which will have limited effectiveness at reducing the Project’s overall impact (relative to other measures/sources). This can be improved by also focusing on the construction materials.
- Construction and Demolition (“C&D”) Debris Recycling can be difficult to enforce. For example, post-construction documentation must be required to ensure recycling plans have been implemented. So too, there must be meaningful consequences in the event that documentation is missing or noncompliant. For example, if penalties are set too low, applicants may accept monetary penalties as a cost of doing business rather than the added expenses and effort required to enforce the mitigation. It is recommended that the measure be modified to require coordination between the applicant, city, and other relevant agencies (e.g., CalRecycle, local enforcement agency) to coordinate the C&D recycling program.<sup>46</sup>
- This measure is similar to *CAPCOA measure S-4* (Recycle Demolished Construction Material) assumed in the CalEEMod worksheets. (SEIR GHG Study, PDF pp. 136-137, 209-210.) CAPCOA measure S-4 specifically identifies “wood-based” material, which should be included in this measure.
- *CAPCOA measure S-5* (Source Wood Materials from Urban Wood Reuse Program) involves using local and reused materials in new construction. This seems applicable to the project and should be included.<sup>47</sup>

02-40

///

<sup>46</sup> CalRecycle, C&D Debris Recycling, <https://calrecycle.ca.gov/condemo/>.

<sup>47</sup> See *CAPCOA Handbook*, PDF p. 72.



SEIR Comments RE: B-2 Hotel Project  
 November 6, 2025  
 Page 21 of 27

- iv. The Project does not seem to include feasible construction-related mitigation measures, such as the following, that are recommended to be incorporated into the MMRP:
  - CAPCOA measure C-3 (Use Local Construction Contractors) requires the use of local construction contractors to reduce VMT associated with construction employee commute distances. This can be incorporated in a manner consistent with General Plan provisions, such as those listed in the Conservation Element (i.e., Goal CON-6, Policies CON-6.1, CON-6.2, CON-IMP-6A, and CON-IMP-6b).<sup>48</sup>
  - CAPCOA measure C-4 (Use Local and Sustainable Building Materials) requires using building materials that are locally sourced and processed, which minimizes VMTs and fuel consumption. This can be incorporated in a manner consistent with General Plan provisions, such as those listed in the Conservation Element (i.e., Goal CON-3, Policies CON-3.1, CON-3.3, CON-3.4, CON-IMP-3B, CON-IM-3C, and CON-IMP-3D).<sup>49</sup>

O2-41

**b. Waste-Related Measures**

Currently, SEIR includes a mitigation measure MM-GHG-11 (Waste Reduction). (SEIR, PDF pp. 15-37, 147-148). This may be inadequate for the following reasons:

- i. MM-GHG-11 currently states the program “may” include various program elements (i.e., recycling program, organics, etc.) It is recommended that it says “shall include” to ensure these feasible elements are incorporated.
- ii. This measure is similar to CAPCOA measure S-1/S-2 (Implement Waste Reduction Plan) assumed in the CalEEMod worksheets. (SEIR GHG Study, PDF pp. 136-137, 209-210.) Measure S-1 requires the institution or extension of recycling services to reduce the volume of landfilled waste. Measure S-2 involves the implementation of an organics diversion program that addresses “food waste (both edible and non-edible)” and may include coordination with onsite/offsite composting facilities and food banks. It is recommended that MM-GHG-11 include additional program components, such as coordinating with “food banks” and composting facilities as part of its recycling program, consistent with CAPCOA measures (i.e., measures S-2, S-3).<sup>50</sup>
- iii. The City should consider including additional hotel-specific recycling program elements, such as:
  - Promote recycled paper and other products like soap;
  - Bans on disposable (i.e., designed to be used once and discarded) foodware items and accessories;
  - Allowing customers to bring their own reusable items (if permissible, this be waived to accommodate kosher or other religious standards);
  - Requirements for hand soap in refillable containers;
  - No promotional items made of plastic;
  - No water in plastic bottles or disposable single-use cups;

O2-42

<sup>48</sup> See City General Plan, Conservation Element, pp. 10.4-10.10.

<sup>49</sup> Ibid.

<sup>50</sup> CAPCOA Handbook, PDF pp. 46-47 (Fig. 3-1), 62-65 (tbl. 3-1).





SEIR Comments RE: B-2 Hotel Project  
 November 6, 2025  
 Page 23 of 27

ii. MM-TRA-2 (Provide End-of-Trip Bicycle Facilities):

- This measure is similar to *CAPCOA measure T-34* (Use Electric or Hybrid Powered Equipment) assumed in the CalEEMod worksheets. (SEIR GHG Study, PDF pp. 136-137, 209-210.) It is also similar to *CAPCOA measure T-10* (Provide End-of-Trip Bicycle Facilities). However, MM-TRA-2 states that a “minimum” of 38 bike parking spaces will be provided, and provides 32 “secure” bike parking spaces. (SEIR, PDF pp. 16, 120.) This should be clarified to specify whether this meets the short-term and long-term bike parking under CalGreen Tier 2 status and is consistent with CAPCOA measure T-34. Also, it should be made clear that the secured parking available for employee bikes shall not be displaced by bike parking for guest rentals. It is also recommended that repair services be made available onsite to both guests and employees (consistent with CAPCOA T-10).
- It is also recommended that this be augmented to include electric bikeshare and/or scooter share program consistent with *CAPCOA measures T-22-A through T-22-D*.

O2-44

iii. MM-GHG-6 (Limit Large Diesel Trucks During Operation):

- The SEIR does not estimate the number of heavy-duty trucks that would be expected from the proposed operation, whether as a generic hotel or as proposed with a unique theme-attraction resort with water park and theater. Hence, it is unclear to what extent the limited 10 heavy-duty trucks are a mitigation rather than a project design feature. This should be clarified.
- Limiting the number of heavy-duty vehicles to 10 per day and requiring an annual update, while commendable, is unlikely to be a meaningful mitigation for this Project. Unlike a warehouse development, heavy-duty truck emissions are not the main contributor to this Project’s GHG emissions (i.e., guest/employee mobile emissions, energy consumption).
- It is recommended that this be augmented to also include electrified loading docks consistent with *CAPCOA measures T-53*.

O2-45

iv. MM-GHG-5 (Guest Vehicle Trip Reductions):

- **Biking:** MM-GHG-5 cites bicycle parking and rentals, which are duplicative of TRA-2. Moreover, there is no explanation why other CAPCOA measures were not considered, such as measures related to bike infrastructure including *CAPCOA measures T-19A and T-19B* (Construct or Improve Bike Facility), *measures T-32* (Orient Project Toward Transit, Bicycle, or Pedestrian Facility), *measure T-33* (Locate Project near Bike Path/Bike Lane), *measure T-37* (Dedicate Land for Bike Trails). Here, the Project is located along a Class II bike lane. (SEIR, PDF p. 187.) It is recommended that MM-GHG-5 measure be modified to include specific elements consistent with these CAPCOA measures (or explain why it is not feasible).

O2-46

///



SEIR Comments RE: B-2 Hotel Project  
 November 6, 2025  
 Page 24 of 27

- **Pedestrian:** MM-GHG-5 also cites “pedestrian” infrastructure (e.g., sidewalks, crosswalks, wayfinding signage), which are common basic infrastructure requirements for large urban developments located adjacent to city streets. This differs from *CAPCOA measure T-17* (Improve Street Connectivity), which involves building a new street network in a subdivision or retrofitting an existing one to improve connectivity (e.g., converting cul-de-sacs or dead-end streets to grid streets). While this measure is similar to *CAPCOA measure T-18* (Provide Pedestrian Network Improvement), it is most effective at the plan/community scale compared to a project/site context. Hence, it is unlikely this component of MM-GHG-5 will have meaningful reductions in impacts. 02-47
- **Marketing:** MM-GHG-5 includes providing information about transit options and nearby attractions. This is akin to *CAPCOA measure T-7* (CTR marketing), which typically targets employees and is recommended to be complemented with other specific transit-related measures as part of a more robust CTR program (discussed further below). However, it is recommended that this measure be modified to include *CAPCOA measure T-43* (Provide Real-Time Transit Information) to enhance its effectiveness. 02-48
- **Last-Mile Trips:** While MM-GHG-5 includes providing information about nearby attractions, it does not address hotel shuttles or other types of incentives for last-mile trips. *CAPCOA measure T-38* (Provide First and Last Mile TNC Incentives) encourages a shift to transit mode by addressing first- and last-mile trips within a specific geographic area (e.g., from a local transit station to a destination). This can include subsidized trips utilizing transit agencies and transportation network companies (“TNC”) (e.g., Uber, Lyft, etc.) Similarly, *CAPCOA measure T-44* (Provide Shuttles) encourages local shuttle service through coordination with local transit operators or private contractors. Hotels often include shuttle services (e.g., airports, local destinations, hotels, etc.). It is recommended that the MM-GHG-5 measure be modified to include specific requirements for implementing TNC incentive/shuttle (electric) services to nearby locations and transit facilities, which should be marketed to prospective guests (or explained why it is not feasible). Such service should also be made available to employees, which would further support mobile emissions/VMT reductions. 02-49
- **Qualitative Assessment/Annual Reporting:** MM-GHG-5 includes only a “qualitative assessment” with “annual” reporting. This is akin to CAPCOA measures T-5 (voluntary CTR) and T-6 (mandatory CTR), which typically address employee trips and often require robust additional measures (CAPCOA measures T-7 through T-13). However, because mobile emissions (along with energy emissions) are the majority of GHG impacts, it is recommended that this measure be made mandatory and performance-based to the extent feasible. As part of the annual review process, the City should require the applicant to provide appropriate documentation relevant to guest VMTs (e.g., number of guests, estimated average daily trips, etc.) and other details about implementation of mitigation measures (e.g., use of shuttles, subsidized last-mile trips, etc.). This objective data can be provided as part of the annual review process and serve as a basis for future decisionmaking about the feasibility of mitigation measures. 02-50



SEIR Comments RE: B-2 Hotel Project  
 November 6, 2025  
 Page 25 of 27

- v. MM-TRA-1 (Implement Commute Trip Reduction Marketing): MM-TRA-1 includes an employee CTR program, which is similar to *CAPCOA measures T-5* (voluntary CTR) and *T-6* (mandatory CTR), typically requiring robust additional measures (*CAPCOA measures T-7 through T-13*). However, the 4% performance level is tied to the SEIR's VMT analysis. (SEIR, PDF p. 179-181.) As discussed above, there are live issues with the VMT analysis that may underestimate VMT impacts (thus warranting perhaps further mitigation). Moreover, the mobile emissions (along with energy emissions) are the majority of GHG impacts, which is admittedly significant. (Id., at PDF p. 15.) Hence, independent of the Project's VMT impact analysis, the Project is required to meaningfully mitigate the Project's GHG impacts (i.e., mobile and energy impacts). Therefore, it is recommended that TRA-1 be modified to be a mandatory CTR program consistent with *CAPCOA measure T-6* (Mandatory CTR program) to discourage single-occupancy vehicles, including the following:
- *CAPCOA measures, as recommended above*, are to be applied to both guest and employee CTR programs.
  - *CAPCOA measure T-9* (Implement Subsidized or Discounted Transit Program) involves subsidized or discounted transit passes. Currently, the subsidy is estimated at 30% participation and is subsidized at 50%. (SEIR GHG Study, PDF p. 12.) It is recommended that this be increased to eligibility and the amount of subsidy to 100% (or explain why it is not feasible).
  - *CAPCOA measure T-11* (Provide Employer-Sponsored Vanpool) involves an employer-sponsored vanpool service. As mentioned above, hotels typically have shuttle service, and it seems feasible to include an employer-sponsored vanpool. It is recommended that the project incorporate vanpools for employees to the extent possible (or explain why it is not feasible).
  - *CAPCOA measure T-13* (Implement Employee Parking Cash-Out) involves the employer providing employees with a choice of forgoing free parking for a cash payment equivalent to or greater than the cost of the parking space. It is recommended that the project incorporate this option (or explain why it is not feasible).
  - *CAPCOA Transit Measures*: The Project Site is conveniently located near multiple bus stops and routes. (SEIR, PDF pp. 164-166, 185.) This may provide an opportunity for the applicant to coordinate with local transit agencies to improve coverage, frequency, or other roadway treatments, consistent with *CAPCOA measures T-25* (Extend Transit Network Coverage or Hours), *T-26* (Increase Transit Service Frequency), and *T-27* (Implement Transit-Supportive Roadway Treatments). Additionally, there may be an opportunity to provide a bus shelter or additional bike parking near existing transit, consistent with *CAPCOA measure T-46* (Provide Transit Shelters) and *measure T-47* (Provide Bike Parking Near Transit).

02-51

///



SEIR Comments RE: B-2 Hotel Project  
November 6, 2025  
Page 26 of 27

**d. Energy-Related Measures**

Currently, SEIR includes several mitigation measures related to energy emissions (i.e., MM-GHG-7 through MM-GHG-12. (SEIR, PDF pp. 15-37, 143-156, 179-180.)

- i. MM-GHG-7 includes building efficiency and calls for LEED certification. (Id., at PDF pp. 18-19.) However, it does not specify what level. Similarly, it is unclear why measure MM-GHG-4 (EV charging) requires CalGreen Tier 2 standards but not in other areas. (SEIR, PDF p. 16.) It is recommended that the City consider requiring at least LEED Gold or Platinum status and meeting CalGreen Tier 2 standards to the fullest extent feasible (e.g., planning and design, energy efficiency, water efficiency, material recovery, environmental quality, whole-building life cycle assessment, Nonresidential Voluntary Measures, etc.).<sup>52</sup> The recommendation should capture and/or include CAPCOA measures related to energy efficiency measures (e.g., E-1, E-2, E.3-A/B, E-5, E-21, E-12, E-16, E-24, E-22, E-25).
- ii. MM-GHG-10 states the project “may” implement a combination of water conservation strategies (e.g., low-flow fixtures, smart irrigation, greywater recycling). (SEIR, PDF p. 21.) It is also recommended that it be modified to include measures consistent with CAPCOA measures W-1 through W-7 (or explain why it is not feasible).
- iii. MM-GHG-13 (prohibit wood burning devices) is akin to CAPCOA measure E-14, which is most relevant to “residential developments.” Hence, this measure is not likely to be meaningful for this non-residential project.

02-52

**e. Carbon Offsets Measure**

Currently, SEIR includes a mitigation measure related to carbon offsets (i.e., MM-GHG-15). (SEIR, PDF pp. 15-37, 143-156, 179-180.) While commendable, “this measure should only be pursued when all possible onsite measures have been implemented or deemed infeasible,” as noted in CAPCOA measure M-2.<sup>53</sup> Hence, it is recommended that the above mitigation measures be utilized first (or explain why they are infeasible). Additionally, as discussed above (supra section B.4), current GHG/VMT estimates may prove inaccurate, and new onsite mitigation measures may prove feasible over the course of the Project’s 30-year lifespan (notwithstanding good-faith efforts). This can be mitigated by requiring an annual review of this measure. Therefore, it is recommended that these measures be modified to require annual reporting regardless of whether the applicant utilizes the “lump sum” or “annual basis” scenario for purchasing offsets. (Id., at PDF p. 28.) This can be coordinated with existing annual reporting requirements and provide the city with the opportunity to consider additional feasible mitigation measures.

02-53

///

<sup>52</sup> <https://www.dgs.ca.gov/bsc/calgreen>; <https://www.dgs.ca.gov/-/media/Divisions/BSC/05-Resources/CALGreen/2022-CALGreen-Supplement-Guide-07-01-24---Final.pdf>.

<sup>53</sup> CAPCOA Handbook, PDF p. 460; see also 2022 Scoping Plan, Appendix D, PDF p. 29 (State recommends and prioritize on-site design measures).



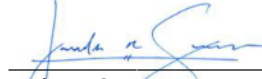
*SEIR Comments RE: B-2 Hotel Project  
November 6, 2025  
Page 27 of 27*

**F. CONCLUSION**

In conclusion, Local 11 would like to thank the City for the opportunity to provide these comments. In short, it hopes to see revisions to the SEIR and MMRP to address the comments herein. We request that this letter be included in the Project's administrative record.

02-54

Sincerely,



---

Jordan R. Sisson  
Attorney for Local 11



INTENTIONALLY LEFT BLANK

## Response to Comment Letter O2

Jordan R. Sisson, Attorney  
On Behalf of Unite Here Local 11  
November 6, 2025

- O2-1** This comment is introductory and provides only a partial summary of the Project Description in the Draft SEIR. No response is necessary.
- O2-2** The comment summarizes those comments that are made throughout the letter.

The Draft SEIR was prepared in compliance with CEQA and the Writ of Mandate (Writ). Thus, it includes a comprehensive analysis of the Project's potential greenhouse gas (GHG) emissions and vehicle miles traveled (VMT) impacts. Responses to the comments in this letter are provided below and are summarized as follows:

- 1. Disclosure of Project Components.** The Draft SEIR and supporting technical reports provide a detailed description of the proposed Project, including site location, design features, and operational characteristics (see Draft SEIR Section 1.4, Overview of the Project; Section 3, Project Description; and Appendix C, Greenhouse Gas Emissions Technical Report [GHG Report], Section 1.4). These disclosures satisfy CEQA's requirements. No revision to the SEIR is required. For further discussion, see Response to Comment O2-7.
- 2. Users of the Project's Components.** The Draft and Final SEIR state that only registered hotel guests will have access to the Project and its various amenities (Chapter 3, Project Description, Draft SEIR, p. 3-4). This limitation is stated in the project design features (PDFs) that are incorporated into the Project's Supplemental Mitigation Monitoring and Reporting Program (Supplemental MMRP; see Chapter 4 of the Final SEIR). The comment's speculation to the contrary is unsupported. For further discussion, see Responses to Comments O2-6 through O2-11.
- 3. GHG Emissions and VMT Impacts.** The comment asserts that the Project's GHG and VMT impacts may be underestimated. Relying on expert analysis, reasonably foreseeable occupancy scenarios, and established methodologies and significance thresholds, the Draft SEIR properly evaluated the proposed Project's potential GHG emissions and VMT impacts. The Draft SEIR discloses that, even with implementation of all feasible on-site mitigation (**Mitigation Measure [MM] GHG-1 through MM-GHG-14**) and carbon offsets (**MM-GHG-15**), emissions would remain significant and unavoidable. The proposed Project's VMT impacts were evaluated using the Orange County Transportation Analysis Model (OCTAM) which is developed and maintained by the Orange County Transportation Authority and mitigated through **MM-TRA-1** and **MM-TRA-2**. These measures would reduce the proposed Project's VMT impacts to less than significant levels. Nothing further is required by CEQA or the Writ. For further discussion, see Responses to Comments O2-8, O2-10, and O2-12-.
- 4. Inclusion of a Housing Alternative.** The comment alleges that the Draft SEIR should have included a housing alternative. In compliance with CEQA, the Draft SEIR evaluates feasible alternatives to the proposed Project, including a reduced-intensity hotel alternative and a no-project alternative. As explained in Section 6.3 of the Draft SEIR, a housing-only development would not conform to the General Plan and zoning criteria, nor would it meet most of the Project's objectives. For these reasons, such a development was "considered but rejected" as a proposed Project alternative. For further discussion, see Responses to Comments O2-26 through O2-35.

5. **Mitigation Measures.** This introductory comment states that further/modified mitigation measures are required. The Final SEIR includes modifications to the mitigation measures and project design features (PDFs) made in response to comments received during the public review period. For further discussion, see Responses to Comments 02-38, 02-40, 02-42, 02-44, and 02-48.

The Draft SEIR and Supplemental MMRP comply with CEQA by providing full disclosure of anticipated impacts, applying conservative assumptions, and imposing all feasible mitigation. Although certain impacts remain significant and unavoidable (GHG emissions), the analysis and mitigation framework are consistent with state and regional climate policies and supported by substantial evidence.

- 02-3** The comment references consistency with various plans and policies. The comment is introductory in nature and summarizes subsequent comments. Responses to those comments are provided below. No further response to this comment is necessary.

- 02-4** The comment is requesting that the SEIR be revised to address the points raised in the letter. Responses to the letter's comments are provided below. Changes made to the Draft SEIR in response to this letter or otherwise are included in Chapter 3 of this Final SEIR. No further response to this comment is necessary.

- 02-5** The comment cites established CEQA case law regarding the requirement for an accurate, stable, and finite project description as a foundational element of a legally sufficient EIR, referencing *San Joaquin Raptor Rescue Center v. County of Merced* (2007), *Citizens for a Sustainable Treasure Island v. City and County of San Francisco* (2014), and *Western Placer Citizens for an Agricultural and Rural Environment v. County of Placer* (2006). The Draft SEIR contains a detailed project description in Chapter 3 that identifies the Project's location and characteristics, including PDFs. This description of the proposed Project enables the public, decision makers, and reviewing agencies to meaningfully evaluate the proposed Project's environmental impacts, consider mitigation measures, and assess alternatives. No further response is necessary.

- 02-6** The comment summarizes the letter's more detailed comments alleging that the Draft SEIR does not disaggregate (address separately) the individual Project components or make enforceable the assumption that 1,000 overnight guests will be on site. See Responses to Comments 02-7 through 02-10.

The proposed Project is a full-service high-rise themed resort hotel. It is intended to function as a fully immersive guest experience where guests come to stay and take full advantage of the amenities. To this end, and as incorporated in the proposed PDFs that are incorporated into the Project's Supplemental MMRP, hotel amenities would be available only to hotel guests. Day passes would be prohibited. In other words, the restriction of amenities to registered hotel guests is a PDF incorporated in the Supplemental MMRP, not merely an analytical assumption. Accordingly, there is no reasonable basis to disaggregate Project components or to assume that there will be more guests on site than the registered hotel guests. No revision to the SEIR is needed.

- 02-7** The comment raises three points: (1) the Draft SEIR does not explain changes to the Project between the Mitigated Negative Declaration (MND) and Draft SEIR, contending that the total building size increased from the 691,693 square feet identified in the MND to 718,919 square feet in the Draft SEIR; (2) unlike the MND, the Draft SEIR does not disaggregate square footage by individual amenity;

and (3) the assumption that amenities are restricted to hotel guests only is not adequately explained. The second and third issues are related and will be addressed together.

The total building square footage has not changed between the MND and the SEIR. The difference in the disclosed building square footage referenced in the comment results from: (1) the MND excluded the below-grade parking square footage (52,206 square feet); and (2) the MND included the themed hotel pool square footage (24,980 square feet). The below-grade parking square footage should have been included, while the swimming pool square footage should have been excluded because it does not constitute building floor area. Both of these errors were corrected in the SEIR, resulting in 718,919 square feet ( $691,693 + 52,206 - 24,980 = 718,919$ ). No comments were received on the MND regarding these issues, nor were they identified in the Writ as a matter requiring further analysis. The Project has not changed in any material respect compared to what was analyzed in the 2022 MND.

The Draft SEIR did not disaggregate uses because this is not an accurate reflection of how the hotel will be operated. The Draft SEIR modeled the proposed Project as a single “hotel” land use because all on-site components—including the fitness room, theater, swimming pool, and restaurant—are ancillary to the hotel use and would not be operated as independent public destinations. Based on the PDFs incorporated into the Supplemental MMRP, hotel amenities would be available for registered hotel guests only. This approach is consistent with the Institute of Transportation Engineers (ITE) Trip Generation Handbook for ITE Land Use 310, which defines a hotel as “a place of lodging that provides sleeping accommodations and supporting facilities such as full-service restaurant, cocktail lounge, meeting rooms, banquet rooms, and convention facilities” along with recreational amenities such as pools and fitness rooms—treating all such facilities as integral components of a single hotel use (ITE 2017). It is further consistent with California Emissions Estimator Model (CalEEMod) guidance for mixed-use projects, under which ancillary facilities that do not function as independent trip-generating destinations are appropriately subsumed within the primary land use category. Disaggregating the hotel’s ancillary amenities as separate land uses would not produce a more accurate analysis; it would mischaracterize the proposed Project by treating captive on-site uses as though they would generate independent external trips and corresponding emissions. They would not.

No SEIR revision is necessary in response to this comment.

**02-8**

The comment asserts that the Draft SEIR’s GHG Report (Appendix C to the Draft SEIR) should not have relied on CalEEMod modeling that analyzes only hotel guest uses of ancillary amenities and features. Please see Responses to Comments 02-6 and 02-7. The comment assumes that the Draft SEIR may underestimate emissions by not analyzing the Project as if outside users could separately access Project amenities and features.

As previously explained, the proposed Project was modeled as a single hotel land use because all ancillary components are integral to the hotel operation, are limited to registered guests pursuant to the PDFs incorporated into the Supplemental MMRP, and do not function as independent trip-generating destinations. This is not a departure from accepted methodology—it is a more accurate characterization of the Project than the prior MND, which disaggregated uses in a manner that does not reflect how the facility will actually operate.

As explained in Section 4.1.4 of the Draft SEIR, the proposed Project’s GHG emissions were generated by CalEEMod (Draft SEIR, p. 4.1-26). The Draft SEIR explained the CalEEMod inputs that were used to

project the proposed Project's potential GHG emissions on pages 4.1-26 through 4.1-33 and in Appendix C. These inputs included the land use types and sizes (Table 4.1-2); construction scenario (Table 4.1-3); and mobile, area, energy, water and wastewater, solid waste, refrigerant, and stationary sources (Draft SEIR, pp. 4.1-29 through 4.1-31). The Draft SEIR went on to explain which PDFs were quantitatively accounted for in CalEEMod (Draft SEIR, pp. 4.1-31 through 4.1-33).

The GHG analysis did not rely solely on CalEEMod default values. Project-specific inputs were substituted for defaults where the proposed Project's operational characteristics warranted refinement. For example, energy consumption estimates were adjusted to account for the heating demands of the themed swimming pool and associated water facilities—a feature that is not reflected in generic hotel defaults. Water use estimates were drawn from the proposed Project's Water Supply Assessment (Psomas 2022) rather than CalEEMod defaults, providing a Project-specific basis for water-related emissions. Amenities such as the themed pool are captured in the modeling through adjusted inputs that reflect their actual operational demands.

The resulting emissions inventory accounts for all major source categories—mobile, area, energy, water, waste, and refrigerants—associated with the hotel and its full complement of amenities. The comment has not identified a specific emission source that is absent from this inventory, nor has the comment provided quantitative support for the assertion that disaggregation would yield materially different results.

With respect to DisneylandForward, that project included theme park and amusement park uses that are categorically distinct from hotel operations, attract an entirely separate and independent visitor population, and have no equivalent in CalEEMod's default land use categories. The proposed Project does not include any public-facing theme park or amusement facility. Its amenities are operationally and functionally equivalent to those described in ITE Land Use 310, which expressly encompasses pools, fitness rooms, restaurants, lounges, and meeting facilities as standard hotel components (ITE 2017).

For these reasons, the Draft SEIR's GHG emissions analysis appropriately modeled the Project as a unified hotel use with Project-specific adjustments, consistent with CEQA and accepted modeling practices. No revision to the SEIR is necessary.

**02-9**

The comment addresses the CalEEMod GHG modeling of mobile source emissions. The comment assumes that the Project's 1,000 guests are based on 2 overnight guests per 500 hotel rooms. This assumption is incorrect. As explained in detail in the Draft SEIR, the number of overnight guests used in the VMT analysis, and in turn in the CalEEMod calculation of mobile source emissions, is based on a reasonably foreseeable occupancy scenario (2.5 persons per room, at 80% occupancy) (Draft SEIR, p. 4.2-13). To the extent this comment reiterates a concern about day users of the proposed Project's amenities, see Responses to Comments 02-6 through 02-8.

The comment seems to assume that the Draft SEIR used only the 1,000 guests to model the Project's GHG emissions but 1,000 guests plus 446 employees to calculate the Project's VMT impacts. That assumption is incorrect. For purposes of the CalEEMod mobile source module, the OD Origin/Destination (VMT) is the relevant methodology. As Draft SEIR Section 4.2 explains, the OD method sums up all VMT from trips that either start or end within the Project. And, as acknowledged in the comment, the OD VMT assessment used a service population of 1,000 guests plus 446 employees

(Draft SEIR, Appendix D, Attachment A, p. 6). Specifically, as described in Table A of the VMT assessment, the Project service population of 1,000 guests and 446 employees results in a total Project-generated VMT of 21,914 (Draft SEIR, Appendix D, p. 6). The GHG Technical Report attached to the Draft SEIR as Appendix C shows that this total 21,914 VMT figure from the VMT assessment was included in CalEEMod (SEIR, Appendix C, pp. 61, 73, and 188).

No revision to the SEIR is needed in response to this comment.

**02-10** The comment assumes that day visitors could access the hotel's amenities. Relying on that assumption, the comment asserts that the Draft SEIR's VMT analysis undercounts vehicle trips by limiting its service population to 446 employees and 1,000 overnight guests; that this represents a departure from the prior MND, which accounted separately for theater trips; and that the analysis should have followed the DisneylandForward approach of incorporating day-guest trips independent of hotel occupancy.

The comment suggests that the VMT analysis should have assumed that more guests would visit the hotel to use the hotel amenities. As explained above, no day visitors or outside guests will be permitted. Because there would be no independent day-visitor population, separate trip rates for ancillary uses are not warranted (see Responses to Comments O2-6 to O2-8).

The prior MND assumed the theater would be open to visitors other than registered hotel guests. That assumption was not consistent with the proposed Project operations discussed in the MND and evaluated in the Draft SEIR.

As explained previously, DisneylandForward includes theme park and amusement facilities open to the general public, generating a large day-guest population entirely independent of hotel occupancy. The proposed Project has no equivalent. As such, separate trip rates for ancillary uses independent of hotel trips are not required for the proposed Project (see Response to Comment O2-8).

No revision to the SEIR is required.

**02-11** The comment states that the Draft SEIR's analysis does not include day visitors in its VMT analysis, as DisneylandForward did. It also cites Great Wolf Lodge as a comparable example, where access to the facility is not limited to registered guests. As explained in Responses to Comments O2-6 to O2-10, access to all on-site amenities—including the theater, restaurant, and themed pool—would be restricted to registered hotel guests pursuant to the PDFs incorporated into the Supplemental MMRP (see Chapter 4, Supplemental Mitigation Monitoring and Reporting Program, of this Final SEIR). Therefore, it would not be appropriate to estimate trips and VMT from day guests because the Project is unlike Disneyland, Knott's Berry Farm, Legoland, or Great Wolf Lodge in that respect. No revision to the SEIR is required.

**02-12** The comment restates that the Draft SEIR's VMT and GHG emissions analysis does not account for trips and VMT from day visitors or guests. The comment suggests that the SEIR either reassess use of on-site amenities by day guests or include a condition of approval or PDF in the MMRP that limits the number of employees and guests to the assumptions used in the Draft SEIR.

The City incorporates Responses to Comments 02-6 through 02-11 on the same topic here. As stated in those responses, no revision to the SEIR is necessary.

- 02-13** This comment acknowledges that the Draft SEIR estimates the Project's GHG emissions at 7,520.09 metric tons of carbon dioxide equivalent (MT CO<sub>2</sub>e) per year, compared to 3,316 MT CO<sub>2</sub>e per year in the prior MND, and prefaces further comments regarding the Draft SEIR's GHG analysis. Responses to those further comments are provided below.

As context for the responses that follow, the updated Draft SEIR GHG emissions analysis was prepared in response to the Writ and in compliance with CEQA. The analysis was updated to reflect current modeling inputs, a new version of CalEEMod, and Project-specific operational source inputs (emergency generator, increased energy use for water heating). The GHG methodology estimates GHG emissions using CalEEMod (the statewide standard modeling program) and the GHG analysis evaluates the Project in comparison to the lowest South Coast Air Quality Management District threshold: 1,400 MT CO<sub>2</sub>e per year for commercial projects.

- 02-14** This comment reiterates the assumption about the use of the Project amenities by day guests and recommends either making that restriction an enforceable condition in the Supplemental MMRP or revising the analysis to account for potential day-visitor access. See Responses to Comments 02-6 to 02-12. The restriction of amenities to registered hotel guests is already specified in the Draft SEIR's project description (Section 3.4.2, Operations, p. 3-4) and incorporated into the Supplemental MMRP, not merely an analytical assumption. No revision to the SEIR is required in response to this comment.

- 02-15** The comment states that the CalEEMod worksheets identify more than 20 emissions reduction measures that correlate with California Air Pollution Control Officers Association (CAPCOA) mitigation strategies, and that it is unclear how these measures correspond to the Draft SEIR's listed PDFs and mitigation measures, whether they are consistent with CAPCOA strategies, and why other CAPCOA measures were not considered for incorporation. More detailed comments on mitigation measures are provided in Section E of the comment letter (designated as Comments 02-36 through 02-53 and addressed herein in Responses to Comments 02-36 through 02-53); corresponding responses are provided in this section in Responses to Comments 02-16 and 02-17.

CEQA does not require inclusion of any CAPCOA measures in a GHG emissions analysis. The Draft EIR analyzed and disclosed the Project's potentially significant GHG impacts with and without mitigation. That analysis included an evaluation of PDFs and feasible mitigation measures, some of which were based on measures identified in CalEEMod or on CAPCOA recommendations. The Project's PDFs and mitigation measures do not mirror CAPCOA language verbatim; rather, they were intentionally tailored to reflect Project-specific design features, construction methods, and operational characteristics. This approach is consistent with CEQA best practice and CAPCOA guidance, which anticipates that lead agencies will adapt recommended measures to suit individual projects. In compliance with CEQA, the Draft SEIR documents the basis for any reductions in GHG emissions or impacts based on application of the PDFs and mitigation measures. Although the Draft SEIR is already compliant with CEQA, to improve clarity, Table 4.1 in Section 4.2, Supplemental Mitigation Monitoring and Reporting Program, in the Final SEIR includes text in italics specifying which CAPCOA measures from the CalEEMod worksheets correlate to each PDF or mitigation measure.

Regarding the comment's suggestion to incorporate additional CAPCOA measures, it is important to note that CEQA does not require adoption of every possible mitigation measure or measures not required to substantially reduce a project's GHG emissions in light of other measures already imposed. Under CEQA Guidelines Section 15126.4(a)(1), mitigation must be "feasible" and capable of substantially lessening or avoiding the significant environmental effect. Measures that are not applicable, do not achieve meaningful reductions, or are speculative do not meet this standard. Courts have reinforced this principle, holding that mitigation must be effective and supported by substantial evidence. The Draft SEIR's mitigation strategy complies with CEQA's requirements. Except as disclosed in the SEIR, the Supplemental MMRP imposes feasible, effective measures such as energy efficiency, renewable energy, water conservation, waste reduction, transportation demand management (TDM), and carbon offsets to reduce the Project's potentially significant impacts.

**02-16** The comment opines that the City should impose different mitigation measures than those specified in the Draft SEIR. Specifically, the comment argues that the City should have included other, unspecified on-site mitigation measures targeting mobile and energy-related emissions before relying on offsets. More detailed comments are provided in Section E of the comment letter (designated as Comments 02-36 through 02-53 and addressed herein in Responses to Comments 02-36 through 02-53); corresponding responses regarding unspecified on-site mitigation measures are provided in this section in Response to Comment 02-17.

The SEIR incorporates feasible and effective PDFs and mitigation measures that directly reduce the Project's potentially significant GHG emissions, including mobile and energy-related GHG emissions. These measures were selected because they are feasible and capable of substantially reducing emissions, as required by CEQA Guidelines Section 15126.4(a)(1). CEQA does not require adoption of measures that are infeasible or fail to achieve meaningful reductions.

Consistent with CAPCOA strategies and CEQA requirements, examples of the SEIR's mitigation measures include the following:

- **Transportation Measures:** **MM-TRA-1** and **MM-TRA-2** reduce employee commute trips through commute trip reduction programs and bicycle facilities, while **MM-GHG-5** promotes guest trip reductions by improving walkability, providing bicycle rentals, and encouraging public transit use.
- **Energy Measures:** **MM-GHG-7** enhances building energy efficiency through advanced HVAC systems, smart controls, and low-E glazing, and **MM-GHG-9** requires installation of on-site renewable energy (solar photovoltaic panels). **MM-GHG-10** addresses water conservation, indirectly reducing energy demand for water heating and treatment.

Although the comment does not identify any specific energy or transportation measures, it is important to note that the Draft SEIR did not claim reductions in CalEEMod for certain transportation-related measures (see Chapter 4, Section 4.1, of this Final EIR for CAPCOA Measures T-5, Implement Commute Trip Reduction Program [Voluntary]; T-7, Implement Commute Trip Reduction Marketing; T-8, Provide Ridesharing Program; T-9, Implement Subsidized or Discounted Transit Program; and T-10, Provide End-of-Trip Bicycle Facilities) when doing so would have potentially resulted in an inaccurate representation of the Project's GHG emissions. Specifically, the Project's GHG emissions generated by VMT, and any related reductions, were based solely on the Project's VMT's modeling and analysis. That VMT modeling and analysis was prepared in accordance with the adopted City of Garden Grove Traffic Impact Analysis

Guidelines for Vehicle Miles Traveled and Level of Service Assessment (VMT Guidelines; City of Garden Grove 2020) and OCTAM. Although the Project includes feasible transportation measures, such as commute trip reduction programs, bicycle facilities, and guest trip reduction strategies, consistent with CalEEMod, GHG reductions were not attributed to those measures because doing so would have required speculation. For those measures, the SEIR still imposed the mitigation as a binding commitment and provided a qualitative analysis rather than quantitative reductions that would not have been supported by substantial evidence. Applying additional VMT-based trip reduction credits in CalEEMod beyond what is already reflected in the OCTAM-based VMT analysis would effectively count the same reductions twice: once in the VMT model and again in CalEEMod. The Draft SEIR avoided this approach to maintain analytical integrity and consistency between technical studies.

As the Draft SEIR discloses, even with the incorporation of feasible energy, transportation, and other GHG reduction measures, the Project's GHG emissions, including from mobile and energy sources, remain significant. For this reason, the Project includes **MM-GHG-15**, which requires purchase and retirement of carbon offsets to achieve emissions below the South Coast Air Quality Management District's lowest threshold of significance of 1,400 MT CO<sub>2e</sub> per year. Offsets are necessary because non-speculative, non-duplicative, quantifiable and feasible on-site mitigation measures are not sufficient to reduce the Project's GHG emissions below a level of significance.

The primary source of GHG emissions for the Project are mobile and energy sources. CAPCOA's Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (Handbook) (CAPCOA 2024) establishes explicit caps to prevent double-counting and overstatement when multiple transportation measures are combined. When land use, neighborhood design, parking/road pricing, and transit measures are combined, for example, the Handbook adopts a 70% maximum reduction in VMT, based on empirical comparisons of suburban vs. central-city travel behavior. Because most mobile-source GHG emissions scale directly with VMT, this 70% VMT cap results in a maximum theoretical GHG reduction of approximately 70% for mobile sources. However, a 70% maximum would not be achievable or reasonable for a guest-oriented resort hotel such as the Project located within the City because the Project's travel demand is driven primarily by discretionary visitor trips originating outside the local region, over which the Project has little to no control, rather than by resident commute patterns or daily internal capture. Unlike mixed-use urban developments or residential infill projects, a destination resort cannot materially influence trip frequency, trip length, or mode choice for most guests, who typically arrive by personal vehicle or regional air travel. As such, the empirical suburban-to-central-city VMT comparison underlying CAPCOA's 70% cap is not applicable to a visitor-serving hospitality use, and applying that maximum reduction would overstate achievable mobile-source GHG emissions reductions and conflict with the Handbook's guidance to avoid speculative or unsupported assumptions. Based on the experience and expertise of the City and its consulting experts, relying on the specifics of the Project and recognizing that the adopted mitigation would not result in quantifiable GHG emissions reductions, a reasonable estimate of potential GHG emissions reductions attributed to the Project's transportation-focused mitigation measures (**MM-GHG-4**, **MM-GHG-5**, **MM-TRA-1**, and **MM-TRA-2**) would be in the range of 10%. Even if all energy GHG emissions were eliminated from the Project, the mobile sources alone would exceed the South Coast Air Quality Management District threshold of 1,400 MT CO<sub>2e</sub> per year. Therefore, the Final SEIR appropriately and reasonably included GHG emission offset credits as a mitigation measure for the purposes of potentially reducing the Project's GHG emissions below the significance threshold.

**02-17** The comment reiterates the assumption about non-hotel guest use of the Project’s amenities and asserts that the required number of offsets may be underestimated. The comment also argues that the City should modify **MM-GHG-15** to impose an annual reporting and reevaluation requirement related to Project GHG emissions, VMT, and mitigation effectiveness. More detailed comments on other PDFs and mitigation measures identified in the comment are provided in Section E of the comment letter (designated as Comments 02-36 through 02-53 and addressed herein in Responses to Comments 02-36 through 02-53).

For responses to comments regarding non-hotel guest use of the Project’s amenities, please see Response to Comment 02-6.

As to the arguments about requiring an annual reporting and reevaluation of GHG emissions and impacts, CEQA does not mandate such an approach following the adoption of an EIR. To do so would introduce a whole new level of uncertainty for projects, public agencies, and the public that is not required by CEQA. Rather, CEQA applies the “rule of reason,” meaning that the analysis and mitigation must be based on reasonable assumptions and substantial evidence, not speculative scenarios. CEQA requires a good-faith estimate of impacts at the time of environmental review based on a reasonable methodology and set of assumptions supported by substantial evidence (CEQA Guidelines Section 15064.4). Lead agencies are afforded discretion to determine the methodology for estimating GHG emissions impacts and selecting mitigation measures, provided the approach is explained and supported by substantial evidence. Further, CEQA prohibits application of the law that imposes additional substantive obligations beyond those specified in CEQA. The Draft SEIR’s GHG analysis, mitigation, and significance determinations comply with CEQA’s standards without imposition of the new methodology and speculation suggested in the comment.

**MM-GHG-15** requires the purchase of carbon offsets either in a lump sum or annually to achieve emissions below the threshold of significance of 1,400 MT CO<sub>2e</sub>. The Draft SEIR’s methodology and analysis meet CEQA’s requirements for a reasonable, evidence-based analysis at the time the project is considered for approval.

**02-18** The comment states that the SEIR should be revised to address the issues previously identified and include consideration of additional mitigation measures, as further discussed in Section E of the comment letter (designated as Comments 02-36 through 02-53); see corresponding Responses to Comments 02-36 through 02-53.

The Draft SEIR includes a suite of GHG mitigation measures, **MM-GHG-1** through **MM-GHG-15**, addressing energy efficiency, renewable energy, water conservation, waste reduction, TDM, and carbon offsets. CEQA does not require an EIR to incorporate every conceivable mitigation measure or to guarantee zero impact; rather, it requires a good-faith effort to disclose and mitigate significant impacts to the extent feasible. The Draft SEIR meets this standard.

**02-19** This comment is introductory and is followed by more detailed comments regarding VMT impacts. The comment cites cases and rulings that the comment contends relate to VMT analysis.

In accordance with CEQA requirements, the Project’s analysis in the Draft SEIR employs the VMT metric and includes both baseline and cumulative conditions analysis of the Project’s potential VMT impacts utilizing VMT Guidelines adopted by the City for that purpose. Specifically, the cumulative scenario

represents the year 2050 and evaluates the potential impacts of the Project in addition to other development that would occur in the future (in terms of population and employment growth included in OCTAM). See Responses to Comments O2-20 through O2-25.

**O2-20** The comment reiterates their statements about non-hotel-guest use of the Project's amenities, as related to the trip generation and service population estimates used in the Draft SEIR. See prior Response to Comment O2-6. As discussed in that response, access to the Project's amenities is restricted to registered hotel guests pursuant to PDFs that are incorporated into the Project's Supplemental MMRP.

**O2-21** The comment requests additional clarification for consistency of the service population estimation with the Great Wolf Lodge.

The comment questions whether the guest service population estimate used in the VMT analysis is consistent with data from the Great Wolf Lodge and other comparable projects, and whether data regarding potential day use was considered. For responses regarding day use of the Project's amenities, please see Response to Comment O2-06.

Regarding consistency with the Great Wolf Lodge resort in Garden Grove mentioned in the comment, that resort also offers guests a fully immersive experience. Information provided to City staff via phone communication indicates that Great Wolf Lodge averages approximately 3.0 persons per room (Austin-Harris, pers. comm., n.d.). Although per-room occupancy data was not readily available for specific hotels, because the Project is smaller in scale than Great Wolf Lodge, the regional average of 2.5 persons per room was used as a good-faith basis for estimating the guest service population. A lower occupancy per room results in a lower service population (i.e., denominator used in the VMT calculation) and therefore results in a higher VMT per service population.

Regarding hotel occupancy rates, data published by the American Hotel & Lodging Association reports that the nationwide hotel occupancy rate in 2019 was 65.9%, with projected 2023 occupancy of 63.8%. California occupancy rates are notably higher, with 2019 occupancy at 74.9% and projected 2023 occupancy at 73.8% (AHLA 2023). Because resort uses of this nature tend to be seasonal and the Project would not be expected to operate at full capacity year-round, an occupancy rate of 80% was used as a reasonable assumption, which is slightly higher than both the national average and the California average. The City's VMT technical expert's use of relevant source data and engineering judgment led to the selection of the 80% occupancy rate. No further analysis is required.

**O2-22** The comment seeks clarification of the Draft SEIR's employee estimate of 446 employees. The comment suggests that the number is inflated, stating that the allegedly inflated estimate results in an understatement of the Project's VMT impact and as a result reduces the mitigation required.

The Draft SEIR explains the basis for the employee estimate on page 4.2-14 and in the VMT Memorandum in Appendix D to the Draft SEIR. In accordance with the City's VMT Guidelines, the VMT analysis utilized OCTAM, which is the transportation analysis model maintained by the Orange County Transportation Authority. OCTAM was also used to evaluate the potential VMT impacts of other resort/hotel uses in Orange County, including the DisneylandForward project.

The Draft SEIR explains that OCTAM does not have a modeling category for "hotel employment" or "resort hotel employment." To estimate the number of employees for the proposed Project, therefore,

the City's technical experts researched other transportation models. One model, utilized because it represents a good fit for the Project, was the SANDAG transportation model (SANDAG Model), maintained by the San Diego Association of Governments (SANDAG). This is because the San Diego region has a number of hospitality uses with features and operations similar to the proposed Project, including several destination and non-destination hotels. The closest fit from the SANDAG Model land use input file for these purposes was "High Rise Hotel." The applicable input for "High Rise Hotel" from the land use input file was used for calculating employment densities (SANDAG 2023) by the City's technical experts.

The SANDAG Model land use input file utilizes a ratio of 1 employee per 1,550 square feet to determine the total number of employees in the "High Rise Hotel" use. Here, the VMT evaluation used the building area of 691,693 square feet for the Project size. Using 691,693 square feet, divided by 1,550 feet per employee, yields 446 employees. This includes part-time and full-time employees.

The comment questions the use of the gross building square footage when applying the SANDAG model. The SANDAG methodology for employment estimation relies on building square footage or area as the basis for estimating employees. SANDAG gathered and compiled real-world information from operating developments to identify the square-footage-based formula for estimating the number of employees. It uses total building area or rentable building area (where available) to estimate employment density datasets for non-residential uses, including hotels. Therefore, the Project's building area was used to estimate the number of employees. The comment offers the opinion that the City should ignore the SANDAG methodology and instead exclude all gross floor area associated with the Project's parking garage from the Project's gross square footage for purposes of estimating employment numbers. However, using the incorrect inputs suggested by the comment would undermine the credibility of the SANDAG model results because it disregards the basic building-square-footage-based methodology to identify an employment density for high-rise hotels. Excerpts from SANDAG ABM2+ Enhancements Final Report, 2.0 Employment Densities, Appendix A, Land Use Definitions, and Appendix B Table 38: Square Footage Based Employment Densities (SANDAG 2022) including spreadsheet with land use inputs (SANDAG 2023) used in the Project's analysis have been provided as attachments to Appendix A, Employee VMT Estimation for Site B-2 Hotel Project Memorandum (Employee VMT Memo).

With respect to the SANDAG employee estimation methodology and the Draft SEIR's reliance on 691,693 square feet as the building square footage, the Draft SEIR conservatively used a lower Project building square footage than that used for the GHG emissions analysis. As relevant to this comment, the VMT impact analysis involves a service-population-based calculation. As the comment recognizes, using higher employment numbers could actually reduce the VMT per-service-population results. While use of the higher building-square-footage number for VMT would have been proper, it would have resulted in only 18 more employees. The Draft SEIR's arguably slight underestimation of employees (and corresponding slight overestimation of the Project's VMT per service population) is a conservative approach that does not necessitate a modification to the SEIR.

In an abundance of caution, the City's VMT experts compared the number of employees generated by the SANDAG model against other relevant sources of employment generation data. Those other sources relied on a per-hotel-room formula that specified that employee ratios can vary between 0.8 and 1.2 employees per room (see City of Hotels 2025). As applied to the proposed Project, the number of employees could range between 400 and 600 employees for a 500-room hotel. This range validates

the SANDAG derived estimate of 446 employees, especially as the SANDAG rate was specifically established for a high-rise hotel like the Project.

The comment compares the SANDAG employee ratio to the ratio provided in the City of Los Angeles (LA) VMT calculator. The City of LA VMT calculator is a highly customized tool based on the 2016 City of LA Travel Demand Forecasting Model. Specifically, one item to note is that the jobs per unit for a hotel and motel are the same at 0.5 employees per room (LADOT & DCP City of LA VMT Calculator Documentation p. 11). The Project is substantially different from a typical hotel/motel found in the City of Los Angeles in terms of amenities and ancillary uses. Typically, a motel would include a small breakfast area and not any of the substantial amenities that will make the Project a destination resort. Similarly, some larger hotels might have restaurants or meeting facilities, but again they would not include the Project's combination of ballroom, meeting space, food, arcade, themed amenities, and spa uses. Therefore, because the SANDAG model includes an employment generation formula established for high-rise hotels like the Project, substantial evidence does not support the comment's argument that the Draft SEIR should have instead used the City of LA methodology.

See Appendix A, Employee VMT Memo, for additional, clarifying information that further validates the methodology and expert conclusions summarized in the Draft and Final SEIR.

Therefore, the use of 446 employees properly estimates the VMT impact of the Project. As shown in the Project's VMT analysis in the Draft SEIR and Appendix D, the VMT per employee is estimated as 15.3 VMT per employee, which is above the City's VMT significance threshold of 14.6 VMT per employee and therefore requires mitigation. The VMT analysis recommends two mitigation measures (**MM-TRA-1** and **MM-TRA-2**) that are feasible and would reduce the Project's VMT impact from its employees to less-than-significant levels. Additional VMT reduction measures are included as part of **MM-GHG-5**. The Project does not require mitigation measures in addition to those currently identified in the Draft SEIR.

**02-23**

The comment asks for clarification regarding the Project VMT analysis and use of OCTAM. The Project's VMT assessment was prepared in accordance with the City's VMT Guidelines and utilized OCTAM, the model recommended by the City's VMT Guidelines for detailed VMT analysis (City of Garden Grove 2020, p. 19). The City's VMT Guidelines require a project's VMT analysis to be conducted using the metric of service population and, if appropriate, using the metric of resident or employee (City of Garden Grove 2020, pp. 16, 20). The Project's VMT analysis goes above and beyond the City's VMT Guidelines in that it evaluates VMT per service population as well as VMT per employee (Draft SEIR, Appendix D, VMT Memorandum, PDF p. 4).

The comment suggests that by comparing the Project to a retail use for VMT analysis purposes, the VMT study concedes that the Project may generate above-average occupancy compared to a typical business or tourist hotel in the City. The City VMT Guidelines state that "in some cases, it may be appropriate to extract the Project-generated VMT using the production-attraction matrix" and that "the City should evaluate the appropriate methodology based on the project land use types and context" (City of Garden Grove 2020, p. 20).

Conservatively, the VMT evaluation chose to employ the Production/Attraction, or PA, method alongside the OD method. The retail comparison in the VMT Memorandum was not a statement about the Project's expected occupancy levels; it was a methodological explanation for why both the OD and PA VMT methods were utilized. As explained in the VMT Memorandum, the hotel use is similar to retail in

the sense that guests may choose to stay at other hotels if this Project were not available, just as shoppers may go elsewhere if a particular retail center is not there (Draft SEIR, Appendix D, VMT Memorandum, p. 2). This characteristic means that, like retail, the Project generates a significant number of customer trips that are best captured through the OD method. At the same time, the hotel is similar to an office use in that employees commute to work, which is best captured through the PA method. By applying both methods, the VMT analysis accounts for both guest and employee trips. This methodological choice does not reflect anything about the Project's anticipated occupancy levels, which are addressed separately in Response to Comment O2-21.

The comment argues that using the City boundary for the VMT analysis artificially truncates the review, given Project's potential regional draw. The comment's assertion that a project with a regional draw requires a different approach to VMT analysis than that used in the Draft SEIR demonstrates a misunderstanding of the purpose and function of the boundary method approach. The VMT Memorandum directly addresses this issue and explains why the City boundary is appropriate for this Project (Draft SEIR, Appendix D, VMT Memorandum, p. 2, footnote 3). The SEIR's use of the City boundary to evaluate the Project's effect on VMT does not mean the VMT analysis assumes that all Project guests will come from the City. The Draft SEIR does not make such an assumption. The boundary methodology evaluates all trips, including those that do not begin or end within the City boundaries. The Draft SEIR recognizes that the proposed Project is a destination resort hotel, which makes it different than a regional shopping center or office park. With all the amenities that will be offered at the hotel, Project guests can arrive and largely remain on site. The VMT analysis recognizes this core element of the Project and considers the Project's location within Orange County, its regional accessibility via Interstate 5 and State Route 22, its proximity to John Wayne Airport, its proximity to nearby destinations such as Disneyland Resort, and the fact that most guests are anticipated to visit the Project with the specific intent to enjoy the Project's on-site amenities and attractions (Draft SEIR, Appendix D, VMT Memorandum, p. 2, footnote 3). These factors distinguish the Project from traditional business hotels and limited-amenity tourist hotels where the hotel itself is not the destination. Those other types of hotels typically offer a place to stay for a night or more. However, other businesses and places are the primary destinations for those visitors and the trips generated by those guests are more likely to be dispersed across a wider geographic area and a larger boundary for those types of hotels might therefore be more appropriate. For example, the Great Wolf Lodge estimated that only 5% of its guests visit Disneyland (Austin-Harris, pers. comm., n.d.). Additionally, if guests choose to visit other attractions, another benefit of the Project is that guests can avail themselves of the public shuttle that offers a convenient means for guests who drive to the Project to visit other tourist attractions, such as Disneyland, without having to incur the cost and hassle of driving their own vehicle. The City boundary thus captures the relevant trip endpoints accurately (Draft SEIR, Appendix D, VMT Memorandum, pp. 2, 4).

The comment argues that the City's VMT Guidelines do not include hotel guests in the service population metric, and that the VMT Guidelines require reasonableness checks of model outputs to ensure the proposed development's effect is accurately captured.

The City's VMT Guidelines define service population as population plus employment (City of Garden Grove 2020, p. 16). The City's VMT Guidelines were developed for standard land uses such as residential, office, retail, and local-serving hotels. A destination resort hotel of this type, which attracts a significant guest population in addition to its employees, presents a unique circumstance, and the

VMT Guidelines did not include a specific metric for such resort hotels. Consistent with the VMT Guidelines' requirement that "all assumptions and methodologies of the VMT analysis are subject to review by the City Traffic Engineer" (City of Garden Grove 2020, p. 16), the VMT analysis was developed in consultation with City staff to ensure that the methodology appropriately captured the Project's specific characteristics.

Including guests in the service population for the Project is the proper approach. OCTAM does not have a separate category for hotel guests (Draft SEIR, Appendix D, VMT Memorandum, PDF p. 3). When employees are input into the Project's traffic analysis zone, the model automatically generates trips for both employees and guests (Draft SEIR, Appendix D, VMT Memorandum, PDF p. 2). This is because OCTAM treats hotel employment as service employment, a land use type that generates both worker commute trips and customer trips. Guest trips therefore appear in the model output automatically, as part of the total VMT figure. Because guest trips are included in the total VMT (the numerator), excluding guests from the service population (the denominator) would produce misleading results. Including guests in the service population ensures that the ratio accurately reflects the Project's projected VMT efficiency. If guests were excluded from the denominator while their trips remained in the numerator, the ratio would be distorted. Including guests in both the numerator and denominator produces a more accurate and complete picture of the Project's VMT per service population.

Additionally, as the comment notes, the City's VMT Guidelines require that model outputs include reasonableness checks of productions and attractions to ensure the proposed development's effect is accurately captured (City of Garden Grove 2020, p. 19). This was done with the Draft SEIR's analysis. The Project's VMT analysis is based on both Project Generated VMT and Project Effect on VMT. While the additive method (where Project socioeconomic data is added to the existing traffic analysis zone) can calculate Project Effect on VMT, it does not isolate the Project to calculate Project Generated VMT. The modeling for the Project therefore necessitated the creation of a Project-specific traffic analysis zone (TAZ), contrary to what the comment argues. The number of trips generated by the Project's TAZ i.e., 3,262 daily trips (shown in Appendix C, CalEEMod Output Files, Section 5.9.1, pp. 260–261)—was compared to ITE trip generation estimates for the proposed uses (using a 5.84 daily trips per room rate for a hotel per the most recent ITE Trip Generation Manual (2025)). Using ITE, a 500-room hotel is estimated to generate 2,920 daily trips. This result demonstrates that the model presents a conservative (higher) estimation of trips for purposes of the VMT analysis that is consistent with, and within a reasonable range of, what using ITE would have generated (i.e., +/- 10%). Because trip numbers generated by the model are higher, they more than adequately and sufficiently account for employee trips that are anticipated for the Project compared to a typical hotel. See Response to Comment O2-10 for a further discussion of the number of Project trips and VMT for the proposed uses.

The comment also suggests that custom theme-park-related trip rates should have been used, similar to the approach used for the DisneylandForward project. As discussed in Responses to Comments O2-08 and O2-10, DisneylandForward includes a public-facing theme park and amusement facilities that attract a significant, independent day-visitor population. The proposed Project has no equivalent public-facing theme park or amusement facility that will be accessible by anyone other than registered hotel guests, pursuant to PDFs incorporated in the Project's Supplemental MMRP. Custom theme-park trip rates are therefore not applicable. The Project's VMT analysis is consistent with the City's VMT Guidelines. No revision to the Draft SEIR is required.

**02-24** The comment asserts that the Draft SEIR failed to incorporate additional TDM measures that would be relevant to the Project's consistency with various General Plan Air Quality and Circulation Element goals and policies.

The Draft SEIR incorporates feasible and enforceable TDM mitigation measures that directly address the Project's VMT impacts and are consistent with the General Plan policies identified in the comment. **MM-TRA-1** implements a commute trip reduction program for employees, consistent with General Plan policies promoting TDM and reduced vehicle trips. **MM-TRA-2** provides end-of-trip bicycle facilities, consistent with General Plan policies promoting bicycle access. **MM-GHG-5** promotes transit use and walkability for guests, consistent with General Plan policies encouraging alternative transportation modes. Together these measures reduce the Project's VMT impacts to less-than-significant levels and demonstrate consistency with the applicable General Plan provisions.

CEQA does not require adoption of every available TDM measure. CEQA only requires those that are feasible and necessary to reduce significant impacts to a less than significant level. The Project's VMT impacts have been reduced to less than significant levels through the adopted mitigation measures. The reference to additional General Plan policies does not demonstrate a conflict between the Project and those policies. It merely suggests that additional measures could have been included. That is not a deficiency under CEQA. The comment's specific TDM recommendations are addressed in Responses to Comments 02-39 through 02-51.

No revision to the Draft SEIR is required.

**02-25** This comment is a concluding recommendation that the SEIR address the issues raised in Comments 02-19 through 02-24 and that further mitigation be considered. Please see Responses to Comments 02-19 through 02-24 for responses to the issues summarized in this memorandum.

**02-26** This comment is introductory and paraphrases general CEQA concepts regarding the required alternatives analysis. The comment argues that the Draft SEIR failed to consider an alternative that includes at least some level of affordable housing on site. As discussed in Responses to Comments 02-27 through 02-35, the Draft SEIR's alternatives analysis was prepared in compliance with CEQA and the Writ of Mandate. The Draft SEIR considered a reasonable range of alternatives, including a no-project alternative and a reduced-intensity hotel alternative, and evaluated whether a housing alternative would be feasible and capable of meeting the Project's objectives. The Draft SEIR meets CEQA's requirements for alternatives analysis.

**02-27** The comment states that the Draft SEIR should have considered a mixed-use alternative with both hotel and residential/affordable housing components.

CEQA states that alternatives must "attain most of the basic objectives of the project" and "achieve the project's fundamental purpose." A lead agency is permitted to reasonably define the underlying project purpose and is not required to analyze an alternative that cannot achieve the basic goal of the project. The unequivocal purpose of the proposed Project is to develop a themed, destination resort hotel. The Project's objectives include, among others, the following: (1) develop a destination hotel; (2) provide for an enhanced overnight guest experience with themed amenities attractive to families and other visitors who will use the Project as a tourist destination location in and of itself; (3) implement the Project site's International West Mixed Use General Plan designation by including hotel, entertainment

and resort elements to promote guest visits of multiple days; (4) develop a destination hotel in a location with convenient access to public transit and a shuttle system that connects the Project to other tourist attractions in the area, including those along the Harbor Boulevard resort corridor; (5) support increased tourism in the City while also complementing other tourist destinations in surrounding communities; (6) generate a material amount of transient occupancy and property tax revenue for the City; and (7) develop a facility of sufficient size to attract a partnership with a national or international theme park franchise (Draft SEIR, Section 1.4.2, p. 1-3).

As a matter of public policy, the City has identified this property for entertainment/resort/tourism uses. The Project site is in an area of the City designated as International West Mixed Use (Focus Area A) along Harbor Boulevard, generally between Chapman Avenue on the north and the Garden Grove Freeway (State Route 22) on the south. According to the Garden Grove General Plan (City of Garden Grove 2008), this area:

Holds critical importance for the City for revitalization and economic stimulus purposes. Ideally situated south of the Disneyland Resort district, this area has opportunities to capitalize and expand tourist-based and entertainment-related uses. Full-service hotels and new restaurants have been constructed, predominately at the intersection of Chapman Avenue and Harbor Boulevard. An Economic Impact and Master Plan for the International West Resort Area was prepared to identify strategies to complement established entertainment, hospitality, and sports venues in the surrounding areas by planning for three entertainment centers connected by themed commercial services and retail uses, entertainment venues, hotels, theaters, and parks.

As the Draft SEIR reflects, the Project site's 3.72-acre property is well situated for the Project's proposed resort hotel use, with frontage along Harbor Boulevard for themed entertainment uses within easy driving distance of Disneyland Resort and within easy proximity of existing tourism based uses in the City (Draft SEIR, Section 3.3, Project Objectives, p. 3-3). The Project site is a prime location for a themed hotel, which is consistent with the long-term vision of the City.

Further, the comment erroneously states that the Draft SEIR did not evaluate a mixed-use alternative with residential and hotel uses. As the Draft SEIR analyzed and disclosed, both an exclusively residential and a mixed-use housing alternative are addressed in the "Alternatives Considered but Rejected" section (Draft SEIR, Section 6.3.4, Residential Alternative, p. 6-4, and Section 6.3.6, Mixed-Use Development Alternative, pp. 6-5 and 6-6). The SEIR demonstrates that neither of those options were feasible or capable of meeting the Project's objectives, nor would the options clearly reduce potentially significant VMT or GHG impacts associated with the Project. The Project site is 3.72 acres in size and would be entirely consumed by a 500-room hotel, themed pool deck, parking garage, and amenities. There is no land available for housing on the Project site without fundamentally reducing the hotel size. A reduced hotel size alternative was considered and rejected in the Draft SEIR because it would not meet most of the Project's basic objectives. A mixed-use alternative that reduces the hotel to accommodate housing would not attain the primary objective of a fully programmed destination resort hotel. Contrary to the comment's assertion, the Project objectives were not artificially constrained to exclude housing.

Although the International West Mixed Use designation permits a mix of uses, including commercial, entertainment, hotel, and residential, as a matter of public policy and local land use authority, the City

is not required to maximize residential development on every site within that designation. The City's state-compliant 2021–2029 Housing Element, adopted October 10, 2023, includes a detailed housing site inventory identifying thousands of parcels throughout the City that are appropriate for affordable and market rate housing development. Specifically, the City has identified more than 2,400 underutilized properties not meeting their full economic potential that could be developed for affordable housing. This site is not among them. Rather, it has long been designated for resort and entertainment uses, consistent with the City's long-term vision for the International West Mixed Use corridor. Because the City and the state have determined that the sites identified in the General Plan Housing Element are sufficient for the City to potentially meet its share of regional housing needs, the comment lacks merit.

**02-28** The comment argues that the Draft SEIR should have considered whether the Project must include affordable housing to be consistent with specified plans and policies, including CAPCOA Measures T-1 and T-4, SCAG RTP/SCS policies, General Plan provisions, and the CARB Scoping Plan. See Responses to Comments 02-29 through 02-31 regarding SCAG RTP/SCS policies, General Plan provisions, and the CARB Scoping Plan. This response specifically focuses on CAPCOA Measures T-1 and T-4.

CAPCOA is a nonprofit professional association of air pollution control and air quality management district officers. It is not a state agency and does not have any regulatory authority. For this reason, CAPCOA measures are voluntary guidance tools, not mandatory regulatory requirements. The CAPCOA Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (CAPCOA 2024) is a resource that lead agencies and project applicants may consult when identifying and quantifying potential GHG emission reductions for CEQA compliance purposes, but it does not establish any legal or regulatory standards. Neither CEQA nor any state regulation requires a project to evaluate its consistency with, or to adopt measures in, CAPCOA's guidance.

The CAPCOA measures referenced in the comment, T-1 (Increase Residential Density) and T-4 (Integrate Affordable and Below Market Rate Housing), are transportation-related measures designed to reduce VMT by locating housing close to jobs, services, and transit. The referenced measures are designed for residential projects and are not applicable to the proposed Project. They address how to site and design housing projects to minimize VMT. The measures do not require a commercial project to include housing. See Response to Comment 02-27 for a discussion of the public policy aspects of this comment and the Draft SEIR's alternatives analysis supporting the rejection of a residential alternative on CEQA grounds.

The proposed Project is a hotel development on a site designated for visitor-serving and resort uses in the City's General Plan. It is consistent with that designation. The fact that the Project does not also include affordable housing does not render it inconsistent with CAPCOA's measures regarding residential projects.

Although the Project does not include residential uses, it advances the GHG emissions reduction and VMT minimization goals that inform CAPCOA Measures T-1 and T-4 through other means identified in the Draft SEIR, including its location and design. The Project site is located along a major transportation corridor near existing transit, providing employment opportunities in proximity to transit and services. As the Draft SEIR analyzes and discloses, these characteristics align with CAPCOA principles of reducing VMT through infill development and transit accessibility.

**02-29** The comment offers policies from SCAG’s 2024 Connect SoCal RTP/SCS and implies that the Project must include affordable housing to be consistent with SCAG’s regional planning framework.

The opinions offered are based on a misapplication of the Connect SoCal plan and the specific RTP/SCS measures identified. The 2024 Connect SoCal document explains that it “does not directly implement or construct projects or have land use authority” (SCAG 2024a). The document also explains that “[d]ecisions about land use and growth, such as what type of housing, offices, or retail get built and where, rests fundamentally with each local government – sometimes referred to as ‘local land use authority.’ A given city or county articulates its land use planning through general plans, specific plans, and other documents (such as zoning ordinances or development agreements)” (SCAG 2024a, p. 47). The Draft SEIR includes an analysis of the Project’s consistency with applicable RTP/SCS provisions. As reflected in Draft SEIR Table 4.1-6, Project Potential to Conflict with Connect SoCal 2024, the Project as mitigated does not conflict with Connect SoCal. Unlike the comment, Table 4.1-6 considers the RTP/SCS policies in context, including the Project site’s location, land use designation, and purpose.

SCAG’s Connect SoCal policies are regional planning goals. They are not mandatory requirements and not every measure identified in the document is applicable to every project or property. A project is consistent with a regional plan if it does not substantially conflict with the plan’s relevant policies. A project need not advance every goal contained in the plan to be found consistent, because different goals serve different purposes and many relate to specific types of activities. The housing-related policies cited in the comment are directed at SCAG, local governments, and regional partners as aspirational goals for increasing housing production across the region on sites the local land use authorities have identified for housing development. They do not require individual commercial projects to include residential components.

The Project affirmatively advances several Connect SoCal objectives, including the following:

- Promoting infill development in a built-out urban area, reducing pressure for greenfield development
- Providing employment opportunities near existing transit and services, helping reduce regional commute distances
- Enhancing mobility options through TDM measures and proximity to high-frequency transit routes

The City addresses its regional housing obligations, and by extension Connect SoCal 2024’s residential goals and policies, through its state-compliant 2021–2029 Housing Element (City of Garden Grove 2023), which identifies more than 2,400 underutilized properties throughout the City that are appropriate for affordable housing development. That is the appropriate mechanism for meeting regional housing needs, not conditions imposed on individual commercial projects the City has long identified as important to the City’s economic development goals and policies.

In summary, the Project is consistent with the City’s General Plan and advances regional sustainability goals through infill development and transit accessibility. The Draft SEIR also demonstrates that the Project, with mitigation, does not conflict with the RTP/SCS. No revision to the Draft SEIR is required.

**02-30** The comment asserts that promoting mixed-use development aligns with various Garden Grove General Plan provisions in the Safety, Land Use, Community Design, Circulation, Economic Development, Air Quality, and Housing Elements and references policies related to integrated land uses, improved mobility, air quality benefits, and housing diversity.

Established law regarding general plan consistency does not require each individual project to satisfy every policy stated in a general plan, and state law does not impose such a requirement. General plans reflect a wide range of competing interests, and agencies are given broad discretion to construe the plan's policies in light of the plan's purposes and to balance the plan's policies when weighing them.

The Draft SEIR includes a General Plan consistency analysis that evaluates the relevant CEQA topic areas. That discussion demonstrates that the Project is consistent with applicable General Plan provisions. Unlike the comment, Draft SEIR Table 4.1-8, Project Potential to Conflict with City of Garden Grove General Plan, considers the General Plan in context, including the Project site's location and the Project's land use designation and purpose. As that discussion and analysis demonstrates, the Project site is designated in the General Plan for visitor-serving commercial uses, and the proposed Project is consistent with that designation.

As demonstrated in Draft SEIR Table 4.1-8 and the associated analysis, the Project as mitigated does not conflict with the applicable General Plan provisions relevant to the CEQA topic areas that the Writ required the SEIR to address. For example, the Project was found to be consistent with the General Plan for the following reasons:

- The Project is located on an infill site along a major transportation corridor, near existing transit, which supports mobility and air quality goals.
- It provides visitor-serving uses and employment opportunities, consistent with the Economic Development and Land Use Elements.
- The Project incorporates PDFs and mitigation measures that promote sustainability, energy efficiency, and reduced vehicle trips, aligning with Air Quality and Circulation Element policies.

With respect to the comment's suggestion that the Project must include housing to comply with the General Plan, the General Plan does not support that argument. As discussed in Response O2-27, the City's housing objectives are addressed through other designated areas in the City identified in the Housing Element. Therefore, the Project site is not needed to meet General Plan housing standards.

The Draft SEIR's determinations of consistency are based on substantial evidence. No revision to the SEIR is required.

**02-31** The comment states that CARB's 2022 Scoping Plan Appendix D (Local Action), building on the 2017 Scoping Plan Appendix B (Local Action), urges numerous local strategies related to mixed-use development and affordable housing, and recommends that the SEIR evaluate the Project's consistency with these measures.

As noted in CARB's 2022 Scoping Plan, Appendix D is not regulatory but is intended to provide clarification on specific topics for planners, CEQA practitioners, and community groups regarding challenges local jurisdictions face when implementing GHG reduction strategies or approving housing projects. It is not exhaustive and focuses primarily on climate action plans and local authority over new residential development.

The comment does not acknowledge that the Draft SEIR includes a Scoping Plan consistency analysis. As reflected in Draft SEIR Section 4.1 and Table 4.1-7, Project Potential to Conflict with 2022 Scoping Plan, the Project as mitigated does not conflict with applicable Scoping Plan strategies. Unlike the

comment, the Draft SEIR's analysis considers the relevant context, including the Project site's location, land use designation, and purpose. Specifically, the Project site is an infill location designated for visitor-serving commercial uses under the City's General Plan. Consistent with CARB's overarching goals, and just by way of some examples, the Project incorporates the following strategies:

- **Infill Development:** The Project utilizes an existing urban site, reducing pressure for greenfield development and supporting compact growth patterns consistent with CARB's land use strategies in both the 2017 and 2022 Scoping Plans.
- **Transit Accessibility and VMT Reduction:** The site is located along a major transportation corridor with high-frequency transit service. The Project incorporates TDM measures, including commute trip reduction programs, bicycle facilities, and guest amenities that encourage walking and transit use, consistent with CARB's local action strategies to reduce VMT (see **MM-TRA-1**, **MM-TRA-2**, and **MM-GHG-5**).
- **Energy Efficiency and Decarbonization:** The Project includes advanced HVAC systems, high-performance glazing, and on-site solar photovoltaic panels, aligning with CARB's goal of transitioning to clean energy and reducing building-related emissions (see **MM-GHG-7** and **MM-GHG-9**).
- **Water and Waste Reduction:** The Project includes measures to conserve water and divert waste, reducing indirect emissions consistent with CARB's short-lived climate pollutant reduction strategies (see **MM-GHG-10** and **MM-GHG-11**).

Because the Draft SEIR evaluates and discloses the Project with imposition of the mitigation, the Project does not conflict with the CARB Scoping Plan.

As discussed in Response to Comment 02-27, the City's housing obligations are addressed through other designated areas identified in the City's Housing Element. No revision to the Draft SEIR's consistency analysis is required.

**02-32** The comment suggests that the Draft SEIR requires a jobs–housing analysis. The comment states that this is relevant to the SEIR's VMT and GHG analysis.

A formal jobs–housing balance analysis is not required by CEQA. CEQA requires that an EIR discuss a project's potential growth-inducing impacts, including the housing needs of new employees and the probable location of that housing (CEQA Guidelines Section 15126.2[e]; *Napa Citizens for Honest Government v. Napa County Board of Supervisors* [2001] 91 Cal.App.4th 342, 370; *Defend the Bay v. City of Irvine* [2004] 119 Cal.App.4th 1261, 1266). Under established CEQA case law, when a project accommodates growth already contemplated in a city's general plan, it does not constitute a growth-inducing impact requiring detailed analysis. In *Clover Valley Foundation v. City of Rocklin* (2011) 197 Cal.App.4th 200, 225–228, the court distinguished between “inducing new growth” and “merely accommodating growth for which the City has already planned,” and agreed with the City's position that growth-inducing impacts are problematic only “where a project is inducing growth to occur which is not already planned for.”

The Project is a destination hotel resort on an infill site on a property that has been General Plan designated as IW, which contemplates just such a use. As acknowledged by the comment, the Draft SEIR includes an evaluation of the Project's potential growth-inducing impacts. That analysis demonstrates that any growth attributable to the Project is consistent with employment growth already

projected in local and regional land use plans. According to the Connect SoCal 2024 Demographics and Growth Forecast Technical Report prepared by SCAG, the City's total employment was 60,700 in 2019, with an anticipated increase of 4,300 jobs by 2035 and an additional 5,500 jobs by 2050 (SCAG 2024b, p. 41). The Project's 446 employees represent approximately 10% of the anticipated job growth by 2035 and approximately 5% by 2050. This is well within projected growth already planned for and analyzed at the programmatic level (Draft SEIR, Section 5.4, Growth-Inducing Impacts).

SCAG's Connect SoCal 2020 plan projected similar employment growth for Garden Grove, forecasting an increase from 57,800 jobs in 2016 to 68,200 jobs by 2045, a total increase of approximately 10,400 jobs (SCAG 2020). The Project's 446 employees represent approximately 4.3% of that projected growth. The consistency between the 2020 and 2024 Connect SoCal employment projections for Garden Grove confirms that the Project's employment falls well within planned growth under both plans.

SCAG is also the agency responsible for preparing the Regional Housing Needs Assessment (RHNA) allocation within the Southern California region. SCAG's 6th cycle RHNA allocation was prepared using employment and household growth projections from the Connect SoCal 2020 plan. Because SCAG's RHNA methodology specifically incorporates employment growth projections, the housing demand generated by projects like this one is already factored into Garden Grove's RHNA allocation. The City's Housing Element was developed in response to that RHNA allocation and identifies sufficient sites throughout the City to meet the resulting housing demand. The Project site is not one of the properties identified in the Housing Element as required for the City to meet its RHNA obligations. Therefore, as the Draft SEIR analyzes and discloses, the Project would have less than significant growth-inducing impacts.

No revision to the Draft SEIR is required.

**02-33** The comment identifies what it represents as California Housing and Community Development (HCD) statistics regarding housing production in the City.

This comment does not identify a deficiency in the Draft SEIR's CEQA analysis. The City's progress toward its RHNA allocation is a housing policy matter, not a CEQA significance threshold. Senate Bill 166 and Housing Element Program 8 (no net loss) are designed to prevent the loss of sites identified in a jurisdiction's housing element to accommodate its RHNA allocation. The Project site is not identified in Garden Grove's Housing Element as a site for affordable housing development. Furthermore, the proposed Project does not remove, demolish, or convert any existing affordable housing units. Accordingly, approval of this Project does not trigger Senate Bill 166 or the no net loss requirement. As discussed in Response to Comment O2-27, the City's Housing Element identifies more than 2,400 underutilized properties throughout the City that are appropriate for affordable housing development. The City's progress toward its RHNA allocation is addressed through those designated sites. No revision to the SEIR is required.

**02-34** The comment raises general legal arguments about the relationship between feasible mitigation, Project alternatives, and the adoption of a statement of overriding considerations under CEQA. The comment does not identify any specific deficiency in the Draft SEIR's analysis or present substantial evidence that would affect the City Council's future consideration of a statement of overriding considerations.

As explained in Responses to Comments 02-27 through 02-33 and 02-35, a mixed-use housing alternative was neither feasible nor capable of meeting most of the Project's objectives. As discussed in Responses to Comments 02-6 through 02-25, the Draft SEIR's impact analysis is supported by substantial evidence. No revision to the Draft SEIR is required.

**02-35** This comment is a concluding recommendation regarding Section D of the comment letter. Please see Responses to Comments 02-26 through 02-34 for applicable responses. No revision to the Draft SEIR is required.

**02-36** The comment is an introductory paragraph that summarizes the author's arguments regarding CEQA's mitigation requirements. The comment asserts that the Project's potentially significant GHG emissions impacts could be further mitigated through modifications to the MMRP.

The City acknowledges that mitigation is a core component of CEQA analysis and that mitigation measures must be enforceable and not illusory. The Project's mitigation measures meet those and all relevant CEQA standards. Each measure is clearly defined, enforceable through the Supplemental MMRP, and except as disclosed in the Draft SEIR with respect to the GHG offset credit mitigation measure, supported by substantial evidence demonstrating feasibility and effectiveness.

The comment's disagreement regarding the scope or content of certain measures does not render them defective under CEQA. CEQA requires that mitigation measures be feasible and capable of substantially reducing a significant impact, not that they eliminate all impacts or incorporate every conceivable strategy (CEQA Guidelines Section 15126.4[a][1]). Courts have affirmed that lead agencies have discretion to determine appropriate mitigation, provided there is a nexus and rough proportionality between the measure and the impact addressed. This principle ensures that mitigation is reasonably related to a project's impacts and not excessive or unrelated.

The Draft SEIR includes a suite of GHG mitigation measures (**MM-GHG-1** through **MM-GHG-15**) that address the Project's primary emission sources (energy and transportation) through feasible on-site strategies and, where necessary, carbon offsets. These measures are enforceable and will be implemented as part of the Project, consistent with CEQA and relevant case law. However, as the Draft SEIR discloses, uncertainty exists regarding the future availability of carbon offset credits and those credits serving as feasible and effective mitigation. Therefore, the Draft SEIR discloses that, notwithstanding the imposition of **MM-GHG-15** requiring carbon offsets, the Project's GHG impacts were determined to be significant and unavoidable.

The Draft SEIR satisfies CEQA's requirements for enforceable, non-illusory mitigation measures. The comment's opinion regarding additional measures does not invalidate the adequacy of the mitigation imposed by the SEIR or the analysis and determinations in same.

**02-37** The comment states that PDFs should be explicitly included in the MMRP. In response, Draft SEIR lists the applicable PDFs and provides that the "following summarizes the Project Design Features (PDFs) that are incorporated into the Project relative to the analysis in this SEIR and that will be included in the MMRP" (Draft SEIR, Section 3.4.3, pp. 3-4 through 3-5). As reflected in the Final SEIR, Chapter 4, the PDFs have been incorporated into the Supplemental MMRP.

**02-38** The comment is introductory, stating that the SEIR’s mitigation measures are commendable but that further modifications and enhancements identified in subsequent comments are warranted.

The mitigation measures identified in the Draft SEIR (**MM-GHG-1** through **MM-GHG-15** and **MM-TRA-1** and **MM-TRA-2**) were developed to address the Project’s specific potentially significant GHG and VMT related impacts and are consistent with CEQA requirements for enforceable mitigation. Although these measures share similarities with CAPCOA-recommended strategies, they have been tailored to reflect the Project’s specific construction and operational characteristics, site constraints, and regulatory context.

The City acknowledges that the CAPCOA measures are a tool that agencies can use when evaluating and mitigating potentially significant GHG and VMT impacts. However, agencies are not required by CEQA to impose CAPCOA measures in whole or in part. As CEQA requires, the mitigation measures included in the Draft SEIR provide effective and enforceable strategies to reduce GHG emissions and transportation-related impacts to less than significant levels. The comment appears to advocate for strict application of CAPCOA measures without consideration of the specific nature and circumstances of the Project. Such an approach could easily run afoul of CEQA. In contrast, the Draft SEIR evaluated potentially applicable CAPCOA measures and the Draft SEIR imposes Project-specific mitigation measures that represent a reasonable and appropriate approach based on substantial evidence and the Project’s environmental setting.

As the following responses and the Final SEIR disclose, although not required, some of the comment’s suggested modifications have been incorporated where they helped to clarify the intent of the previously drafted measures or enhanced their effectiveness. These refinements improve implementation and strengthen enforceability without altering the substance of the mitigation measures or the Draft SEIR’s analysis and conclusions. Importantly, these modifications do not require recirculation of the Draft SEIR as they do not constitute “significant new information” as defined under CEQA Guidelines Section 15088.5.

**02-39** The comment states that Draft SEIR includes several construction-related GHG mitigation measures (**MM-GHG-1** through **MM-GHG-3**) and asserts that these may be inadequate. The comment recommends explicitly incorporating all construction-related PDFs into the MMRP, ensuring use of Tier 4 final engines where feasible, and expanding measures beyond limited equipment types (e.g., generators, cranes, compressors) to cover broader construction activities.

As discussed in the Draft SEIR Section 4.1, Greenhouse Gas Emissions, GHG mitigation measures for construction emissions are limited; however, feasible mitigation has been provided in **MM-GHG-1** through **MM-GHG-3**.

As noted in Response to Comment 02-37, all PDFs have been incorporated into the Supplemental MMRP. As noted in Response to Comment 02-15, a notation has been added to clearly identify which CAPCOA measure from the CalEEMod worksheets are applicable to each PDF or mitigation measure. As stated in the Draft SEIR, all PDFs were qualitative.

As to Tier 4 engines, the previously approved 2022 MND included PDF-3, which required that “All diesel construction equipment should have Tier 4 low emission ‘clean diesel’ engines (OEM [original equipment manufacturer] or retrofit) that include diesel oxidation catalysts and diesel particulate filters that meet the latest California Air Resources Board (CARB) best available control technology.” This PDF

was already imposed as a performance standard in the Project's PUD and will continue to apply to the Project if approved in connection with the City's consideration of the SEIR. PDF-3 was not analyzed in the Draft SEIR because that measure does not serve to reduce GHG emissions. Rather, Tier 4 equipment targets criteria air pollutants, specifically oxides of nitrogen (NO<sub>x</sub>) and particulate matter. These air quality topics are beyond the scope of the Writ and therefore the SEIR.

The third argument presented in the comment refers to **MM-GHG-1** and **MM-GHG-2** and their relationship to CAPCOA-1. The comment offers an opinion that the mitigation measures imposed are narrower and/or different than the corresponding CAPCOA measure. The Draft SEIR imposed feasible mitigation measures related to Project construction consistent with CEQA requirements. PDF-8 requires the use of electric-powered equipment on a broad basis where feasible, which addresses the intent of reducing emissions from construction activities. **MM-GHG-1** does not supersede or limit PDF-8. Instead, **MM-GHG-1** addresses a subset issue as it targets specific equipment types, such as generators, cranes, and air compressors, where electric alternatives have been determined to be commercially available and can be feasibly implemented for this Project. These combined measures ensure enforceability and practicality.

As the Draft SEIR discloses, the primary source of construction-related GHG emissions are from heavy equipment use and the temporary field office, which are already addressed through PDF-8, **MM-GHG-1**, and **MM-GHG-2**. The comment asks for an expansion of these measures, but including equipment types for which electric alternatives are not currently feasible would not be practical or enforceable. Therefore, the Draft SEIR appropriately focuses on measures that are both effective and achievable. To be responsive to the comment, **MM-GHG-1** has been clarified to implement the original intent by requiring a construction equipment emissions minimization plan that broadly requires electrification where feasible. Notably, for purposes of identifying the GHG emission reductions the mitigation measure will achieve, emissions reductions have only been credited for the crane, generators, and air compressors, because those equipment pieces have been determined to be feasible at this stage of the CEQA process. **MM-GHG-2** requires the temporary construction field office to be equipped with energy-efficient lighting and Energy Star certified heating and cooling units.

**MM-GHG-1** and **MM-GHG-2** address those construction components that (1) account for a substantial portion of construction emissions and (2) are under the direct control of the Applicant and its contractors. Although the edits made to **MM-GHG-1** in response to the comments clarify the type of construction equipment that could be powered with electricity, the GHG emissions reductions quantified in the SEIR are conservatively limited to those known to be feasible and commercially available at the time of Project implementation. Expanding the measures to include equipment types for which electric alternatives are not currently feasible, or that are not typically specified at this stage of the CEQA process, would result in a less reliable, less conservative approach compared to the approach in the SEIR.

The final component of the comment relates to CAPCOA Measure C-1B (Use Cleaner Fueled Construction Equipment). That CAPCOA measure was evaluated for feasibility to reduce the Project's GHG construction emissions during preparation of the Draft SEIR. The City did not impose that measure, however, for reasons that include the following:

- **CalEEMod Limitations:** In CalEEMod, "cleaner fueled equipment" under C-1B is currently limited to compressed natural gas (CNG). The Project already addresses electrification through CAPCOA

Measure C-1A, which is imposed and reflected in PDF-8 (Draft SEIR, p. 4.1-32) and **MM-GHG-1**. PDF-8 broadly requires the use of electric-powered equipment where feasible, which is a more effective and widely applicable strategy compared to use of CNG. Measure C-1B's restriction to CNG reflects an older, transitional mitigation framework, whereas Measure C-1A is consistent with current best practice and regulatory direction in California air quality planning. Unlike electrification, CNG remains a combustion-based technology that emits NO<sub>x</sub>, involves methane slip, and is associated with hazardous air pollutants. CARB's 2022 Scoping Plan for Achieving Carbon Neutrality identifies widespread electrification and major reductions in fossil natural gas use as necessary to meet State air quality and climate goals, and CARB regulations further recognize methane and toxic emissions from natural gas systems as significant concerns. Accordingly, CAPCOA Measure C-1A represents a more stringent and policy-consistent mitigation approach than CalEEMod Measure C-1B, and no changes to the Draft SEIR are required.

- **Other Cleaner Fuels:** CAPCOA Measure C-1B references fuels such as renewable diesel and hydrogen, which are not explicitly modeled in CalEEMod (see CAPCOA 2024, pp. 411–413). Renewable diesel use can also have other environmental impacts, including increased lifecycle emissions of certain pollutants (e.g., NO<sub>x</sub>) and potential upstream impacts related to feedstock sourcing and land use. Hydrogen-fueled construction equipment is currently very limited in availability and not practical for this Project.
- **Project Measures Meet Intent:** The Project meets the intent of CAPCOA Measure C-1B through PDF-8 (requiring electric equipment broadly, where feasible) and **MM-GHG-1**, which specifically requires the use of electric generators, cranes, and air compressors during the painting phase. These measures provide enforceable and feasible strategies to reduce GHG emissions consistent with CEQA requirements.

For these reasons, imposing CAPCOA Measure C-1B would not provide additional meaningful reductions beyond what is already achieved through the Project's PDFs and mitigation measures. The Draft SEIR's approach ensures effective and practical implementation without introducing infeasible requirements.

**02-40** The comment addresses **MM-GHG-3** (Construction Debris Recycling). Without support, the comment argues that **MM-GHG-3** will have limited effectiveness because the site is largely vacant and there are enforcement challenges, and recommends requiring post-construction monitoring. Additionally, the comment recommends incorporating CAPCOA Measures S-4 (Recycling Wood-Based Materials) and S-5 (Sourcing Wood from Urban Reuse Programs) into the MMRP.

The Draft SEIR incorporates **MM-GHG-3**, which requires the recycling or salvaging of non-hazardous construction debris. Contrary to the comment, this measure as drafted applies broadly to all construction materials, not just demolition debris. Specifically, the mitigation measure imposes a requirement to first develop a plan based on identified performance criteria for approval by the City and then a requirement to, as expressed in the Draft SEIR "recycle or salvage nonhazardous construction debris such that a minimum target of 75% is achieved. This will exceed the City's current target of 65% diversion." Nonetheless, in response to the comment, the Final EIR will modify **MM-GHG-3** to add clarifying language regarding the broad scope of the construction recycling requirements.

**MM-GHG-3**      **Construction Debris Recycling.** Prior to the start of construction, the Project's contractor shall develop a Construction Waste Management Plan (Plan) for

submittal and approval to the City of Garden Grove. The Plan shall recycle or salvage non-hazardous construction debris, ~~such that a minimum target of 75% is achieved. This will exceed the City's current target of 65% diversion.~~ including but not limited to wood, metal, concrete, asphalt, and other reusable materials generated during construction activities. The contractor shall implement the Plan to achieve a minimum diversion target of 75% of non-hazardous construction and demolition debris from landfills, exceeding the City's current 65% diversion requirement. (CAPCOA Measure S-4)

The clarifying language does not change the substance of what was already required by **MM-GHG-3** as disclosed in the Draft SEIR; therefore, recirculation of the SEIR is not required under CEQA Guidelines Section 15088.5.

The comment references CAPCOA Measure S-4 in support of its argument about the need for recycling of wood-based materials. As noted above, any wood-based construction materials used during Project construction are already covered by the broad requirements of **MM-GHG-3**. Nothing further is required in that regard. Also, as the Project site is devoid of trees and existing structures, no tree removal or demolition of existing wood structures that would generate significant wood waste would occur.

The comment also requests that the City impose CAPCOA Measure S-5 on the Project. The comment does not offer a GHG reduction justification for inclusion of such a qualitative measure. The comment also ignores the Project's commitment to sustainable building practices is reflected in PDF-27. That PDF prioritizes low-impact, sustainably sourced, and recyclable materials across construction and interior finishes. This includes the use of low-volatile organic compound (VOC) paints, Forest Stewardship Council-certified wood, and recycled-content flooring. PDF-27 also requires implementation of vendor standards requiring environmental product declarations and third-party certifications to verify material sustainability, selection of materials not only for their initial environmental footprint but also for durability and long-term performance. As the Draft SEIR demonstrates, the PDFs and mitigation measures could reduce Project impacts below the applicable significance thresholds, and the measures suggested in the comment would have no qualitative GHG reduction benefits. Nothing further is required.

**02-41** The comment states that the Project does not appear to include feasible construction-related mitigation measures and recommends adding CAPCOA Measures C-3 (Use Local Construction Contractors) and C-4 (Use Local and Sustainable Building Materials) to the MMRP. The comment asserts that these measures would reduce VMT and fuel consumption and align with General Plan Conservation Element goals and policies.

The comment does not acknowledge that the Draft SEIR imposed feasible VMT mitigation measures and PDFs that reduced the Project's potentially significant impacts to less than significant. Therefore, CEQA does not require the imposition of additional mitigation as suggested in the comment. The measures in the Draft SEIR are technologically feasible, enforceable through the Supplemental MMRP, and effective in reducing GHG emissions and construction-related impacts. As discussed further below, additional CAPCOA measures suggested by the comment (e.g., Measures C-3 and C-4) were considered but determined to be either qualitative, already addressed through existing measures, or impractical to enforce under CEQA.

CAPCOA Measure C-3 (Use Local Construction Contractors) was considered but determined not to be needed, feasible, valid, or effective for the following reasons:

- Economic and social considerations do not provide a quantifiable reduction in emissions.
- CEQA should not be used to dictate policy matters of the type addressed in this measure. Contractor selection is based on specialized expertise, safety standards, and capacity to deliver a complex project on schedule.
- Contractor selection is a contractual and business decision, not an environmental performance standard, making this measure unqualified as potentially binding CEQA mitigation.

CAPCOA Measure C-4 is a qualitative measure in CalEEMod and does not provide quantifiable VMT reductions. Although not relevant to the comment's focus on VMT impacts, the Project is designed to meet Leadership in Energy and Environmental Design (LEED) accreditation standards, which include sustainable building design and material selection. This commitment is reflected in PDF-27, which prioritizes low-impact, sustainably sourced, and recyclable materials, including Forest Stewardship Council-certified wood, recycled-content flooring, and low-VOC finishes. Vendor standards also require environmental product declarations and third-party certifications to verify material sustainability. No modifications to the Final SEIR are required based on this comment.

**02-42**

The comment states that **MM-GHG-11** (Waste Reduction) "may be inadequate." The comment alleges that the mitigation measure uses permissive language ("may include") rather than mandatory ("shall include") for program elements like recycling and organics diversion. The comment instead suggests using CAPCOA Measures S-1 and S-2 and included a list of the comment's ideas of other steps a hotel could take related to recycling.

As noted in the 2024 CAPCOA Handbook, measures S-1 and S-2 result in potentially small reduction in GHG emissions from waste management pathways. The CAPCOA Measure S-1 states, "this measure will institute or extend recycling services to reduce the volume of landfilled waste" and CAPCOA Measure S-2, states, "this measure will implement an organics diversion program to reduce the volume of organic waste sent to landfills" (CAPCOA 2024). Neither measure prescribes specific items or diversion targets. **MM-GHG-11** captures both CAPCOA measures and imposes a diversion target.

The Draft SEIR incorporates **MM-GHG-11**, which requires waste reduction measures, including organics diversion. Contrary to the comment's argument, the measure includes mandatory language requiring Project compliance with a minimum diversion rate of 25% for solid waste and organics, which establishes a clear performance standard consistent with CEQA. As disclosed in the Draft SEIR, Section 4.1, page 4.1-30, California Department of Resources Recycling and Recovery (CalRecycle) data shows that hotels and lodging contribute 1.5% to the total commercial waste stream in Garden Grove (CalRecycle 2025). The CalRecycle data also shows that hotels and lodgings in Garden Grove divert approximately 19.8% of their mixed solid waste. The most recent statewide waste characterization study showed that large hotels divert 22.7% of their mixed solid waste (CalRecycle 2006). Based on these statistics, the diversion target of 25% for the Project would be above and beyond what has historically been achieved and demonstrates the Project's commitment to waste management.

**MM-GHG-11** only uses permissive language ("may include") when identifying the non-exclusive list of options the Project could use to achieve the mandated minimum waste diversion rate. This approach

is intentional to allow flexibility and innovation in achieving the required diversion rate rather than prescribing a rigid list of actions.

Although **MM-GHG-11** already complies with CEQA and is consistent with applicable General Plan goals, the Final SEIR will identify some of the comment's suggestions, such as coordination with food banks and composting facilities (CAPCOA Measure S-3), as additional options the Project could choose from to achieve the mandated waste diversion reduction rate. Those additions to **MM-GHG-11** do not require recirculation of the Draft SEIR under CEQA Guidelines Section 15088.5.

**02-43** The comment asks a question about **MM-GHG-4** in relation to CAPCOA Measure T-14. The comment seems to suggest that the mitigation measure imposing CALGreen Tier 2 standards for the Project's EV charging facilities should be expanded to broadly require Tier 2 standards for the Project. The comment does not argue that **MM-GHG-4** is not feasible or enforceable or otherwise CEQA compliant.

The comment is made in isolation without consideration of all the PDFs, mitigation measures, and regulatory requirements imposed on the Project. The Draft SEIR includes **MM-GHG-4**, which requires installation of EV charging infrastructure consistent with CALGreen Tier 2 standards. **MM-GHG-4** is not a measure designed to address energy standards for all components of the Project. The mitigation measure addresses one specific component of the Project, EV chargers. Like CAPCOA Measure T-14 (Provide Electric Vehicle Charging Infrastructure) referenced in the comment, **MM-GHG-4** only addresses EV charging facilities. No inconsistency exists. With respect to other elements of the Project, the Project as a whole must comply with the CALGreen mandatory standards as a matter of law. Those other Project components, such as energy efficiency and building envelope requirements, are addressed through separate measures and design features that meet or exceed applicable code requirements, such as PDF-11 (California Building Standards), **MM-GHG-7** (Building Energy Efficiency), and **MM-GHG-8** (Cool Roof/Deck).

**02-44** The comment requests clarifications and modifications to **MM-TRA-2** (Provide End-of-Trip Bicycle Facilities) related to bike parking and voluntary CALGreen measures. The comment also states that the mitigation measures should include other components of CAPCOA Measure T-34 or T-10 and provide electric bikeshare and/or scootershare program consistent with CAPCOA Measures T-22-A through T-22-D.

**MM-TRA-2** (Provide End-of-Trip Bicycle Facilities) is already consistent with CAPCOA Measures T-10 (Provide End-of-Trip Bicycle Facilities) and T-34 (Provide Bike Parking). The comment's description of T-34 as "Use Electric or Hybrid Powered Equipment" is incorrect; T-34 pertains to bike parking requirements, according to the CAPCOA Handbook (CAPCOA 2024).

The comment's suggestion that there is uncertainty about the bike parking is unfounded. The 2022 California Building Code requires 5% short-term bicycle parking for new motorized vehicle spaces and requires 5% of the tenant-occupied vehicular parking spaces for long-term bicycle parking. There are no Tier 2 standards for bicycle parking. Compliance with the current California Building Code, calculated using the total 528 parking spaces provided by the Project, translates to approximately 27 short-term and 27 long-term bicycle parking spaces. **MM-TRA-2** requires a minimum of 38 spaces for guests (i.e., short term) and 32 secure bicycle parking spaces for employees (i.e., long term). Thus, the minimums in the mitigation measures exceed the code requirements of 27 short-term and 27 long-term bicycle spaces.

To avoid any doubt, **MM-TRA-2** has been clarified in the Final SEIR to specify that the 38 bicycle parking spaces are short-term spaces for guests, and the 32 secure bicycle parking spaces are longer-term spaces for employees. Although the existing measure is clear as drafted, the revised language will explicitly state that employee spaces are not displaced by guest rentals. It should be noted that **MM-GHG-5** also references the 38 guest spaces. Thus, the clarifying language does not trigger recirculation as required under CEQA Guidelines Section 15088.5.

As to the comment's recommendation for additional mitigation measures, please see Response to Comment O2-36. Although not needed for the Draft SEIR or Final SEIR to comply with CEQA as VMT impacts are already less than significant with the incorporated measures and because the CAPCOA measures referenced in the comment are qualitative measures under CalEEMod, the PDF incorporated into the Supplemental MMRP will require that the Project install a self-service bicycle repair station adjacent to the guest and employee bicycle parking spaces in response to the comment. Further, with respect to the comment's suggested addition of CAPCOA Measures T-22-A through T-22-D (Electric Bikeshare/Scootershare), those measures do not apply to the Project's land use type, scale, or locational context. Those CAPCOA measures target residential neighborhood design, per the CAPCOA Handbook (2024).

In summary, **MM-TRA-2** meets CEQA requirements by providing enforceable bicycle facilities consistent with CAPCOA guidance. The analysis and determinations disclosed within the Draft SEIR demonstrate that the Project will have less than significant VMT impacts with the mitigation imposed and no further mitigation is required.

**O2-45**

The comment states that **MM-GHG-6** (Limit Large Diesel Trucks During Operation) lacks clarity on whether limiting heavy-duty trucks to 10 per day is a mitigation measure or a PDF. The comment states that this measure is unlikely to significantly reduce GHG emissions because trucks are not the primary source of emissions for a hotel like the Project. The comment also argues the Project should include electrified loading docks per CAPCOA Measure T-53.

The Draft SEIR clearly identifies **MM-GHG-6** as a mitigation measure, not a PDF. This measure was analyzed in the GHG Report (Appendix C of the Draft SEIR), which includes two sets of CalEEMod results:

- Unmitigated Scenario ("B-2 Hotel GHG Construction and Operation August 2025 – Unmitigated Detailed Report," Draft SEIR, Appendix C, pp. 127–199)
- Mitigated Scenario with Truck Restrictions ("B-2 Hotel GHG Construction and Operation August 2025 – Mitigated with Truck Restrictions Detailed Report," Draft SEIR, Appendix C, pp. 200–272)

In the unmitigated scenario, CalEEMod applied its default mobile source fleet mix, which is based on CARB's EMFAC model and DMV registration data for the region. This default mix assumed approximately 70 heavy-duty truck trips per day, which overstates truck-related GHG emissions. As the comment notes, unlike a warehouse, heavy-duty truck emissions are not the main contributor to the Project's GHG emissions. In the mitigated scenario, the fleet mix was adjusted to reflect the restriction to 10 heavy-duty trucks per day under **MM-GHG-6**, which still likely overstates the Project's heavy-duty truck emissions. Nevertheless, **MM-GHG-6** imposes limits on the number of heavy-duty trucks per day. As shown in the GHG Report, mobile source emissions decreased from 2,655 MT CO<sub>2</sub>e (unmitigated) to 2,480 MT CO<sub>2</sub>e (mitigated) (Draft SEIR, Appendix C, PDF pp. 142 and 215).

Regardless, as the comment itself argues, large diesel truck trips during operation would be minimal. Further, **MM-GHG-5** ensures that the maximum number of daily trips will not exceed 10 making such a measure unnecessary. The comment itself offers no substantial evidence to support the request. In addition, CAPCOA Measure T-53 (Electrified Loading Docks) is a qualitative measure in CalEEMod that would not provide quantifiable reductions for the Project. Further, the comment fails to acknowledge that the Project already includes PDF-12 and PDF-21, which limit idling time for delivery vehicles, effectively reducing emissions during loading/unloading.

In summary, **MM-GHG-6** is an enforceable mitigation measure that was modeled and shown to result in the GHG emissions disclosed in the Draft SEIR for the mitigated condition. Please see Response to Comment O2-36 for a discussion of the CEQA standard regarding mitigation. The additional measures suggested by the comment are not needed or required by CEQA.

**02-46** The comment states that **MM-GHG-5** duplicates **MM-TRA-2**. The comment asserts that the Draft SEIR does not discuss CAPCOA Measures T-19A/B (Construct or Improve Bike Facility), T-32 (Orient Project Toward Transit/Bike/Pedestrian Facility), T-33 (Locate Project near Bike Path), and T-37 (Dedicate Land for Bike Trails). Given the Project's location along a Class II bike lane, the comment recommends modifying **MM-GHG-5** to include specific elements consistent with these CAPCOA measures or to explain why such measures are not feasible.

The comment mischaracterizes **MM-GHG-5** and **MM-TRA-2**. As shown in the Draft SEIR, **MM-GHG-5** broadly applies to measures designed to reduce guest vehicle trips. Some of those measures include the provision of bicycle infrastructure for guests. In contrast, **MM-TRA-2** addresses bicycle parking for employees.

In addition, please see Responses to Comments O2-15 and O2-36 explaining that CEQA does not require incorporation of all CAPCOA measures or all measures suggested by a comment. With respect to the suggestion about CAPCOA Measures T-19-A/B, T-32, T-33, and T-37, the recommended action is not warranted for at least the following reasons:

- **CAPCOA Measures T-19-A/B** (Construct or Improve Bike Facility) do not apply to the Project's land use type, scale, or locational context per CalEEMod guidance.
- **CAPCOA Measures T-32 and T-33** are qualitative in CalEEMod and largely relate to site orientation and accessibility. These measures do not apply to the Project's land use type, scale, or locational context; they target residential neighborhood design, per the 2024 CAPCOA Handbook. The Project site is in a highly urbanized area near a mix of commercial and residential uses, within close proximity to public transit and adjacent to a Class II bike lane. As disclosed in the Draft SEIR, the site is targeted for hotel development due to its proximity to attractions and destinations, which inherently support destination accessibility. Between compliance with PDFs, mitigation measures and regulatory requirements, the Project will include bicycle parking for employees and guests and will be designed in accordance with City standards for pedestrian and bicycle infrastructure, improving walkability and connections to alternative transportation modes.
- **CAPCOA Measure T-37** relates to dedication of land for bike trails. Measure T-37 is not applicable to the Project in CalEEMod because it does not apply to the Project's land use type, scale, or locational context; it targets residential neighborhood design, per the 2024 CAPCOA Handbook. Further, the Project site is already located adjacent to a Class II bike lane.

In summary, **MM-GHG-5** is an enforceable mitigation measure that is adequately discussed and described in the Draft SEIR. CEQA does not require the additional mitigation recommended by the comment. No revision to the Draft SEIR or Supplemental MMRP is warranted.

**02-47** The comment states that **MM-GHG-5** includes basic pedestrian infrastructure elements (e.g., sidewalks, crosswalks, wayfinding signage) that are standard requirements for urban projects and are unlikely to yield meaningful GHG emissions reductions. The comment draws comparisons between **MM-GHG-5** and CAPCOA Measure T-17 (Improve Street Connectivity) and Measure T-18 (Provide Pedestrian Network Improvement). The comment argues that the CAPCOA measures may not be applicable to the Project and that **MM-GHG-5** may not result in quantifiable emission reductions.

**MM-GHG-5** includes pedestrian and bicycle infrastructure improvements as part of a comprehensive strategy to reduce guest vehicle trips and promote alternative transportation modes. As the comment notes, sidewalks, crosswalks, and wayfinding signage are common requirements for urban projects; however, incorporating these elements into a mitigation measure ensures they are enforceable and implemented as part of the Project's GHG emissions reduction strategy. **MM-GHG-5** also goes beyond standard requirements by integrating unique features such as bicycle rentals for hotel guests, transit information, and qualitative assessments of effectiveness through guest feedback and annual reporting. As disclosed in the Draft SEIR, **MM-GHG-5** was not evaluated as a quantifiable GHG emissions reduction measure given the uncertainty about the magnitude of reductions that could be achieved.

The CAPCOA measures cited, T-17 (Improve Street Connectivity) and T-18 (Provide Pedestrian Network Improvement), are not relevant to the Project. Those measures are primarily intended for residential neighborhood design and are most effective at the plan or community scale. Per CalEEMod guidance, these measures do not apply to the Project's land use type, scale, or locational context. The Project is a hotel development in a highly urbanized area adjacent to existing city streets and a Class II bike lane; therefore, creating new street networks or retrofitting existing ones is not a measure that would achieve quantitative or qualitative GHG emissions reductions for the Project.

**MM-GHG-5** is appropriate because it memorializes pedestrian and bicycle improvements, ensures compliance through City verification, and includes operational strategies to actively encourage walking, bicycling, and transit use. CEQA does not require adoption of all possible mitigation measures, only those that are feasible and capable of substantially reducing impacts (CEQA Guidelines Section 15126.4[a][1][B]).

**MM-GHG-5** is a reasonable and enforceable measure that addresses pedestrian and bicycle connectivity within the Project context and supports GHG reduction goals.

**02-48** The comment addresses the marketing element of **MM-GHG-5**. The comment states that the marketing component resembles CAPCOA Measure T-7 (CTR [Commute Trip Reduction] Marketing) that is typically aimed at employees. The comment recommends incorporating CAPCOA Measure T-43 (Provide Real-Time Transit Information).

**MM-GHG-5** includes provisions to provide guests with information about transit options and nearby attractions to encourage the use of alternative transportation modes. The comment erroneously compares the mitigation measure to CAPCOA Measure T-7 (CTR Marketing), which typically targets

employees. **MM-GHG-5** is tailored to the Project's hotel use and focuses on reducing guest vehicle trips through marketing and operational strategies. As discussed in previous responses, the Draft SEIR evaluated **MM-GHG-5** as a qualitative GHG emissions measure.

The recommendation to incorporate CAPCOA Measure T-43 (Provide Real-Time Transit Information) was considered and the measure has been incorporated into **MM-GHG-5** as described in the Final SEIR. While CAPCOA Measure T-43 is identified in CalEEMod as qualitative, the Draft SEIR already requires the Project to provide transit information to guests, including local bus routes, schedules, and wayfinding to nearby transit stops along Harbor Boulevard. The Project will further implement this requirement by providing real-time transit information, consistent with CAPCOA Measure T-43, to enhance awareness and use of alternative transportation modes in a manner appropriate to the Project's operational context. The clarifications made to **MM-GHG-5** do not require recirculation of the Draft SEIR under CEQA Guidelines Section 15088.5.

As discussed in responses to comments such as O2-36, CEQA requires adoption of feasible mitigation measures that substantially reduce significant impacts but does not mandate inclusion of all suggested measures (CEQA Guidelines Section 15126.4[a][1][B]). **MM-GHG-5** is appropriate and enforceable because it memorializes transit-related information as part of the Project's mitigation strategy and includes qualitative assessments and annual reporting to ensure effectiveness.

**02-49**

The comment states that **MM-GHG-5** does not address first- and last-mile transportation needs, such as hotel shuttles or incentives for rideshare services. The comment recommends modifying the measure to include CAPCOA Measures T-38 (Provide First and Last Mile TNC [Transportation Network Company] Incentives) and T-44 (Provide Shuttles), with a focus on electric shuttles and subsidized TNC trips for guests and employees. The comment suggests that these services should be made available to prospective guests and employees to further reduce VMT and mobile emissions.

**MM-GHG-5** includes measures to provide guests with information about transit options and nearby attractions to encourage alternative transportation use. The comment does not acknowledge, as disclosed in the Draft SEIR, that the Project is located within 0.5 miles of a major transit stop or the Anaheim Transportation Network Route 3 and 4 transit lines that will allow Project guests to travel to tourist attractions in the area such as Great Wolf Lodge and Disneyland without reliance on personal vehicles. Thus, first- and last-mile transit services already exist. Although not required to support the Draft SEIR's GHG and VMT impact determinations, the Final SEIR includes the following clarifications to existing measures incorporated in response to this comment: dedicated shuttles, real-time transit information, and transit pass purchase options.

The comment suggests adding CAPCOA Measures T-38 (Provide First and Last Mile TNC Incentives) and T-44 (Provide Shuttles) to further reduce vehicle trips. These measures were considered but determined not to be required given the nature of the Project and the analysis in the Draft SEIR, for reasons including the following:

- **MM-TRA-1** addresses employee travel by requiring subsidized transit passes for employees.
- **MM-GHG-5** has been updated to clarify that the hotel will provide information to guests about how to purchase transit passes and potential transit promotions.

- **MM-GHG-5** has been updated to clarify that the hotel will make available a dedicated shuttle service linking the hotel to nearby transportation, shopping and entertainment destinations, prioritizing battery-electric vehicles where route length and charging logistics allow.

The above-referenced existing or clarified measures will not change the Draft SEIR's GHG emissions analysis or conclusions, and the clarifications do not trigger recirculation of the SEIR under CEQA Guidelines Section 15088.5.

**MM-GHG-5** is a reasonable and enforceable mitigation measure that memorializes guest-focused strategies such as providing transit information, promoting walking and bicycling, and integrating alternative transportation options into the guest experience. CEQA does not require anything further.

**02-50** The comment acknowledges that **MM-GHG-5** is a qualitative measure and that the Draft SEIR analyzes it accordingly. The comment argues that the mitigation measure should be mandatory and "performance based," with annual monitoring.

The comment does not accurately describe the scope or purpose of **MM-GHG-5** or the referenced CAPCOA measures. That mitigation measure is specifically designed to reduce guest vehicle trips through operational strategies such as promoting walking, bicycling, and transit use. The measure is not an employee commuter trip reduction program and thus is not intended to address the same issues as CAPCOA Measures T-5 (Voluntary CTR) and T-6 (Mandatory CTR) referenced in the comment. Those measures do not apply to hotel guests.

Although a comparison is not relevant given the different purposes of the measures, **MM-GHG-5** requires the Project to implement specific actions and goes beyond CAPCOA Measure T-5 by including a qualitative assessment and annual reporting. Thus, the measure is mandatory and it includes a requirement that the Project operator conduct monitoring and provide the resultant data to City. There is no requirement under CEQA to adopt a mandatory measure such as CAPCOA Measure T-5 or T-6 for guests. The Project's approach is appropriate because the Draft SEIR evaluates **MM-GHG-5** as a qualitative measure that imposes guest-focused strategies, integrates alternative transportation options into the guest experience, and includes qualitative assessments and annual reporting to ensure effectiveness of GHG emissions reduction goals. Based on the Draft SEIR's qualitative analysis of **MM-GHG-5**, the overall discussion and determination regarding GHG impacts and the mandates of CEQA, the additional VMT guest data the comment recommends is neither required nor necessarily useful. **MM-GHG-5** is a reasonable and enforceable measure specific to the Project. CEQA requires nothing further.

**02-51** The comment states that **MM-TRA-1** (Implement Commute Trip Reduction Marketing) is similar to CAPCOA Measures T-5 and T-6. This comment concerns a VMT related mitigation measure, but the comment asserts that changes should be made to this mitigation measure to address the comment's statements about GHG emissions.

The comment's characterization of **MM-TRA-1** is misleading. **MM-TRA-1** is an employee CTR program that the Draft SEIR properly credits with a 4% VMT reduction based on the modeling and other substantial evidence presented in the record. The comment does not question the effectiveness of that measure in achieving the identified VMT reduction using the measures identified as part of **MM-TRA-1** in the Draft SEIR.

The comment fails to acknowledge, as discussed in Responses to Comments 02-9 and 02-16, that the GHG analysis did not take any further reductions in GHG emissions for implementation of **MM-TRA-1**. Thus, the GHG emissions presented in the Draft SEIR are likely conservative. Please also refer to Responses to Comments 02-9 and 02-16, which address the GHG arguments repeated in this comment and the interplay between the VMT and GHG emissions analysis and mitigation measures.

The comment offers no support for the request for additional GHG emissions analysis or the requested mitigation measures given the Draft SEIR's discussion and determinations regarding the Project's GHG emissions impacts. Nonetheless, the following discusses each of the specific topic areas identified in the comment:

- **Comment 02-50.** With respect to the comment's cross-reference to Comment 02-50, please see the Response to Comment 02-50 above.
- **CAPCOA Measure T-9.** The comment erroneously states that the Draft SEIR GHG Report (Appendix C) included CAPCOA Measure T-9. To the contrary, the VMT Memo included as Appendix D of the SEIR included CAPCOA Measure T-9. Appropriate VMT reduction for CAPCOA Measure T-9 has been applied as part of **MM-TRA-1** and is explained in Response to Comment 02-44. As noted above, no separate reductions in GHG emissions have been taken for this measure. As described in **MM-TRA-1**, 100% of the employees will be considered eligible to participate in the CTR program. **MM-TRA-1** includes transit subsidies for employees as one component of the program and uses participation percentages as a reasonable scenario based on professional judgment and experience with this measure. Especially for an operation like a hotel, with its 24-hour operations, it would be speculative to assume greater transit usage than evaluated in the Draft SEIR. Speculative analysis and assumptions of the type recommended by the comment are anathema to CEQA and its mandate for a good-faith effort at full disclosure of a project's potentially significant impacts.
- **CAPCOA Measures T-11 (Provide Employer-Sponsored Vanpool) (qualitative measure) and T-13 (Implement Employee Parking Cash-Out) (quantitative measure).** The Project includes **MM-TRA-1**, which implements a CTR program for employees and is similar to CAPCOA Measures T-11, which encourage ridesharing and reducing single-occupancy vehicle trips. Further, **MM-TRA-1** encourages ridesharing by setting aside a minimum of 10 preferential parking spaces for carpools/vanpools. Additionally, **MM-GHG-5** promotes alternative transportation for guests by integrating transit information into the guest experience and providing bicycle parking and rentals. As discussed in Response to Comment 02-49, a disincentive exists for single-rider vehicle trips because the Project is located within 0.5 miles of a major transit stop, the Anaheim Transportation Network public transit lines provide service to regional transit locations such as Disneyland, and the hotel will provide a shuttle service. With regard to CAPCOA Measure T-13, this measure was not incorporated into the Project because it is a context-dependent measure with effectiveness varying widely by land use type, employee demographics, and parking environment (CAPCOA 2024). CAPCOA and transportation agencies have cautioned that parking cash-out is more suitable for individual office or institutional projects and may not be appropriate or scalable for complex land uses such as hospitality resorts (Fehr and Peers 2024). As such, excluding T-13 is consistent with accepted professional practice and CEQA's mandate to avoid speculative analysis.
- **CAPCOA Measures T-25 (Extend Transit Network Coverage or Hours), T-26 (Increase Transit Service Frequency), and T-27 (Implement Transit-Supportive Roadway Treatments).** T-25 and T-27 are quantitative measures and T-27 is a qualitative measure. These measures are primarily intended for transit agencies or larger-scale developments with control over regional transportation

infrastructure. The Project is an infill resort hotel located within 0.5 miles of a major transit stop along a major transportation corridor. The Project does not have authority to extend transit coverage, increase service frequency, or implement roadway treatments, which are under the jurisdiction of local transit agencies and/or matters without a nexus to an infill development like the Project. Further, the measures are not applicable per CalEEMod for the Project's land use type, land scale, and/or locational context.

- **CAPCOA Measure T-46 (Provide Transit Shelters).** This is a qualitative measure, but it is not applicable per CalEEMod for the Project's land use type, land scale, and/or locational context.
- **CAPCOA Measure T-47 (Provide Bike Parking Near Transit).** This is a qualitative measure, but it is not applicable per CalEEMod for the Project's land use type, land scale, and/or locational context. See also the discussion in Response to Comment O2-49 regarding the Project site's proximity to various public transit services and noting that **MM-TRA-1** and **MM-GHG-5** require on-site bicycle parking for employees and guests. Nothing further is required.

CEQA requires adoption of feasible mitigation measures that reduce impacts to a less than significant level but does not mandate inclusion of all suggested measures or measures outside the Project's control (CEQA Guidelines Section 15126.4[a][1][B]). The Draft SEIR's GHG emissions analysis and significance determinations comply with CEQA. The comment's recommendations are unnecessary and are not required by CEQA.

**O2-52**

The comment acknowledges that the Draft SEIR includes energy-related mitigation measures (**MM-GHG-7** through **MM-GHG-12**). Without support, the comment recommends the adoption of additional CAPCOA measures and asks for clarification about the Project LEED certification level. The comment also criticizes **MM-GHG-10** as permissive based on an erroneous description of the measure's requirements. The comment concludes with the assertion that **MM-GHG-13** (Prohibit Wood-Burning Devices) is unlikely to be meaningful for a non-residential project.

- In response, as it relates to the LEED certification levels and State energy standards, the GHG analysis assumed that the Project would achieve energy efficient levels of at a minimum of 15% above the 2022 Title 24 Building Envelope Energy Efficiency Standards. To clarify the intent of **MM-GHG-7**, that measure will be revised in the Final SEIR to mandate that the Project achieve, at a minimum, an energy efficient level of 15% greater than what is required by the 2022 Title 24 Building Envelope Energy Efficiency Standards. As already mandated by **MM-GHG-7**, those reductions must be validated by the City prior to the issuance of building permits. In addition, although not required or assumed in the Draft SEIR's GHG analysis, please see response to comment O2-43 for a discussion of the comment regarding CalGreen Tier 2 standards and **MM-GHG-4**. **MM-GHG-7** has been clarified in the Final SEIR to state that the Project shall achieve a LEED certification of Gold or Platinum.

With respect to the specific CAPCOA energy measures identified in the comment, no further changes are necessary or required under CEQA for at least the following reasons:

- **CAPCOA Measure E-1:** The requirements of this measure are implemented through **MM-GHG-7** (15% above Title 24).
- **CAPCOA Measure E-2:** Appliance efficiency is one potential strategy for achieving the energy reduction standards identified in **MM-GHG-7**. That measure also addresses HVAC operations, and

an energy management system. Given the performance standard included in the mitigation measure, additional, appliance specific provisions are unnecessary.

- **CAPCOA Measures E-3-A/B:** These are qualitative measures in CalEEMod addressing energy-efficient residential boilers (E-3-A) and commercial boilers (E-3-B) and are not applicable to the Project's land use type or scale per CalEEMod.
- **CAPCOA Measure E-5:** This measure is not feasible due to limited roof space; furthermore, **MM-GHG-8** addresses heat island reduction.
- **CAPCOA Measures E-21, E-22, and E-25:** These are qualitative measures in CalEEMod addressing cool pavements (E-21), obtaining Third-Party HVAC Commissioning and Verification of Energy Savings (E-22), and installing electric heat pumps (E-25). The intent of these measures is captured through **MM-GHG-7** and **MM-GHG-8**. **MM-GHG-7** includes electric heat pumps for space heating and domestic water heating.
- **CAPCOA Measures E-12 and E-16:** These measures are targeted at residential development and are not applicable. Further, zero net energy is infeasible for this Project due to limited roof space for solar and the energy demands of resort hotel operations. In addition, as disclosed in the Draft and Final SEIR, the Project incorporates meaningful energy reduction measures, as well as a requirement to install a solar energy system that will generate a minimum of 267,000 kilowatt-hours per year (**MM-GHG-9**).
- **CAPCOA Measure E-24:** This measure addresses strategically providing battery storage. Battery storage has been added to **MM-GHG-7** for clarification purposes, as shown below in strikethrough/underline:

MM-GHG-7 Building Energy Efficiency Measures. Prior to issuance of building permits, the Project ~~applicant~~ applicant or designee shall submit documentation of building energy efficiency measures to the City of Garden Grove, such that a minimum of 15% above 2022 Title 24 Building Envelope Energy Efficiency Standards is achieved. Energy efficiency measures shall include, at a minimum, the following:

1. LED Lighting – High-lumen LED light fixtures shall be used exclusively for the lighting of spaces throughout the Project that require 8 to 10 watts per fixture.
2. Energy efficient lighting shall be incorporated into all on-site lighting and energy-efficient appliances shall be incorporated into Project operations.
3. HVAC Optimization – The HVAC system shall include the following:
  - a. ~~Heat~~ Electric heat pumps will be used for space heating and domestic hot water, with all systems integrated and monitored by the Project Building Management System for performance optimization, fault detection, and energy tracking. ~~to heat spaces and water using a heat exchanger and will be monitored by the Project Building Management System (BMS).~~
  - b. Smart thermostats, which include a motion sensor detector and door/window open sensors, will be installed in each guest room.
  - c. The central plant will utilize a Combination Plant with SmartPlate EV.
4. Glazing – All glazing for the tower and exterior public spaces shall be installed with Low-E glass [U-factor (thermal transmittance)  $\leq 0.28$  and Solar Heat Gain Coefficient (SHGC)  $\leq 0.23$ ].

5. Energy Management System – The Project shall use advanced systems to monitor and optimize energy use in real time.
6. Benchmarking and Monitoring – The Project shall incorporate an Energy Star Portfolio Management system to track and manage energy consumption.
7. Third-Party Verification/LEED Certification – The Project shall obtain third-party HVAC commissioning verification or LEED certification of Gold to Platinum to verify energy savings.
8. Battery Energy Storage – The Project would include an on-site battery energy storage system occupying approximately 500 to 1,000 square feet, consisting of modular lithium-ion battery cabinets and associated electrical equipment. The system would be used for peak load management and grid resiliency consistent with California Fire Code and Title 24 requirements.  
*(CAPCOA Measure E-1 is quantified; CAPCOA Measures E-7, E-9, E-22, E-24, and E25 are qualitative)*

Further, CEQA does not require incorporation of the additional water conservation recommendation suggested by the comment for reasons that include the following:

- **MM-GHG-10** requires a Water Conservation Compliance Report and imposes a performance standard mandate of a minimum 10% reduction in total water use compared to the baseline of 167 gallons per room per day (Psomas 2022). As specified in the mitigation measure, the Project must achieve an average of no more than 150.3 gallons per capita per day at full Project occupancy.
- As the Draft SEIR discloses, the Project already implements feasible CAPCOA water measures, including W-2 (Greywater Use), W-5 (Water-Efficient Landscaping), and W-7 (Water Conservation Strategy), as elements of achieving the water conservation required by **MM-GHG-10**.
- Other CAPCOA measures (e.g., W-1 [Use Reclaimed Non-Potable Water], W-3 [Use Locally-Sourced Water Supply], W-4 [Require Low-Flow Water Fixtures], and W-6 [Reduce Turf in Landscapes and Lawns]) are either infeasible due to lack of recycled water availability or duplicative of measures already included in **MM-GHG-10**.

Regarding **MM-GHG-13** (Prohibit Woodburning devices, Natural Gas Fireplaces and Fire Pits), hotels, especially those with aquatic and event space uses like the Project, will include fireplaces and fire pits. Consistent with CAPCOA Measure E-14, which is directed at residential uses, **MM-GHG-13** ensures that any potential guest gathering features such as fireplaces and fire pits will use clean energy sources such as electricity, eliminating a potential emissions source. Nothing would be served by the comment's suggestion that the City remove this measure and the Draft SEIR's GHG analysis only addresses this restriction as a qualitative measure.

For the reasons noted above, the Draft and Final SEIR's consideration of energy efficiency matters is consistent with CEQA's requirements. Nothing further is required.

**02-53** The comment states that **MM-GHG-15** (Carbon Offsets) is commendable but offers an opinion that carbon offsets should only be used after all feasible on-site mitigation measures have been implemented or deemed infeasible. The comment again treats CAPCOA, particularly language in CAPCOA Measure M-2, as if it were controlling as it relates to compliance with CEQA. The law does not support the comment's argument in general or specifically as it relates to Carbon Offsets. Without

factual or legal support, the comment also recommends annual reporting and reassessment of carbon offset requirements over the Project's 30-year lifespan.

**MM-GHG-15** requires the purchase of carbon offsets to address any remaining GHG emissions after implementation of all the PDFs and on-site mitigation measures identified in the Final SEIR. The mitigation measure incorporates elements and requirements consistent with GHG reduction approaches recommended by the GHG experts at Dudek. The carbon offset elements included within **MM-GHG-15** are consistent with CEQA's requirements, including minimum standards for the credits, a process of third-party verification, and prioritization of where projects generating credits are located. As discussed in these responses to comments, the CAPCOA measures recommended by the comment are either already required of the Project through PDFs or mitigation measures, are not applicable to the Project, are not of a nature that would allow for quantification such that the amount of carbon offsets would be reduced, or are otherwise not feasible or speculative. Similarly, nothing in CEQA requires a mitigation measure to impose continual reassessment and recalibration. For example, CEQA Guidelines Section 15126.4(a)(1)(B) requires adoption of feasible mitigation measures that substantially reduce significant impacts but does not mandate prioritization beyond what is feasible or require ongoing reassessment once impacts have been evaluated and mitigated. The approach suggested by the comment would run counter to CEQA's informed decision-making mandates because it would create uncertainty for the decision makers, developer, operator, and the public as to what the Project must do to offset its GHG emissions. **MM-GHG-15** is appropriate and consistent with CEQA. No further response is required.

**02-54** This comment expresses appreciation for the opportunity to comment on the Draft SEIR and does not require a response.

## References

AHLA (American Hotel & Lodging Association). 2023. "Hotel Occupancy: 2019 Performance vs. 2023 Projections by State." Oxford Economic Analysis. February 2023. [https://www.ahla.com/sites/default/files/SOTI\\_report\\_Oxford\\_Data\\_Occupancy.pdf](https://www.ahla.com/sites/default/files/SOTI_report_Oxford_Data_Occupancy.pdf).

Austin-Harris, J. n.d. Phone call re: per-room occupancy data at Great Wolf Lodge between J. Austin-Harris (General Manager, Great Wolf Lodge) and G. Blodgett (Deputy Director Economic Development, City of Garden Grove).

CalRecycle (California Department of Resources Recycling and Recovery). 2006. *Targeted Statewide Characterization Study: Waste Disposal and Diversion Findings for Selected Industry Groups (341-2006-0006)*. Accessed June 2025. <https://www2.calrecycle.ca.gov/Publications/Download/787>.

CalRecycle. 2024. *Baseline Report for the Zero Waste Plan*. July 1, 2024. Accessed June 2025. <https://www2.calrecycle.ca.gov/Publications/Details/1741>.

CalRecycle. 2025. Business Group Waste Stream Calculator. Accessed August 2025. <https://www2.calrecycle.ca.gov/WasteCharacterization/BusinessGroupCalculator>.

- CAPCOA (California Air Pollution Control Officers Association). 2024. *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*. October 2024. Accessed February 2025. [https://www.airquality.org/ClimateChange/Documents/2024%20Handbook%20Update\\_AB434.pdf](https://www.airquality.org/ClimateChange/Documents/2024%20Handbook%20Update_AB434.pdf).
- City of Anaheim. 2023. "Transportation Section" and "CEQA Transportation Analysis" for the DisneylandForward Project. Section 5.14 and Appendix J-1 in *DisneylandForward Subsequent Environmental Impact Report No. 352, State Clearinghouse No. 2021100402*, prepared by Psomas for the City of Anaheim, September 2023. Prepared by Gibson Transportation Consulting Inc. for the City of Anaheim. August 2023.
- City of Garden Grove. 2008. *Garden Grove General Plan*. May 2008. <https://ggcity.org/planning/general-plan>.
- City of Garden Grove. 2020. *City of Garden Grove Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment*. Prepared by Fehr & Peers. May 2020.
- City of Garden Grove. 2022. *City of Garden Grove Economic Development Report & Analysis, B-2 Site: NewAge Garden Grove II, LLC Nickelodeon Resort Hotel Prepared Pursuant to Government Code Sections §53083 and §52201*. August 28, 2022. <https://ggcity.org/sites/default/files/economic-development-report-and-analysis.pdf>.
- City of Garden Grove. 2023. "2021–2029 Housing Element." Chapter 12 in *Garden Grove General Plan*. Resolution No. 9825-23. Adopted October 10, 2023. <https://ggcity.org/sites/default/files/gghea.pdf>.
- City of Hotels. 2025. "Hotel Staff." Online article. <https://www.city-of-hotels.com/165/hotel-staff-en.html>.
- Crain and Associates. 2013. "Millennium Hollywood Project Transportation Modeling Procedures and Results." Appendix B in the *Final Environmental Impact Report for the Millennium Hollywood Project*, City of Los Angeles, February 8, 2013. February 1, 2013.
- Dayoub, D. 2021. "Why Are We Surprised that Hospitality Workers Are Moving to Other Sectors?" Article on the Ludwig Institute for Shared Economic Prosperity website. October 22, 2021. <https://www.lisep.org/content/why-are-we-surprised-that-hospitality-workers-are-moving-to-other-sectors>.
- Fehr and Peers. 2024. *VMT/GHG Model Mitigation Program Report*. December 2024. [https://ccag.ca.gov/wp-content/uploads/2024/12/VMT-GHG\\_Model\\_Mitigation\\_Program\\_Final\\_Report.pdf](https://ccag.ca.gov/wp-content/uploads/2024/12/VMT-GHG_Model_Mitigation_Program_Final_Report.pdf)
- ITE (Institute of Transportation Engineers). 2017. *Trip Generation Handbook*, Third Edition. Prepared by K.G. Hooper for ITE. <https://ecommerce.ite.org/ItemDetail?iProductCode=RP-028D-E>.
- ITE. 2025. *Trip Generation Manual*, 12th Edition. August 2025. <https://www.ite.org/technical-resources/topics/trip-and-parking-generation-v2/trip-generation-info/>.
- LADOT and DCP (Los Angeles Department of Transportation and Los Angeles Department of City Planning). 2020. *City of Los Angeles VMT Calculator Documentation*, Version 1.3. May 2020. [https://ladot.lacity.gov/sites/default/files/documents/vmt\\_calculator\\_documentation-2020.05.18.pdf](https://ladot.lacity.gov/sites/default/files/documents/vmt_calculator_documentation-2020.05.18.pdf).
- Psomas. 2022. *Site B-2 Hotel Water Supply Assessment*. March. Prepared for AECOM and the City of Garden Grove.

SANDAG (San Diego Association of Governments). 2023. SANDAG ABM2+ Version 14.2.2. File containing information on land use unit type. Email communication between C. Arellano and S. Tewani. September 11, 2023.

SANDAG. 2022. SANDAG ABM2+ Enhancements Final Report. August 2022. <https://github.com/SANDAG/ABM/wiki/Reports-and-Documents>.

SCAG (Southern California Association of Governments). 2001. *Employment Density Study Summary Report*. October 31, 2001. Prepared by The Natelson Company Inc. for SCAG. <https://docplayer.net/30300085-Employment-density-study-summary-report-october-31-prepared-for-southern-california-association-of-governments.html>.

SCAG. 2020. "Demographics and Growth Forecast." Technical report, *Connect SoCal 2020*. Adopted September 3, 2020. <https://www.scag.ca.gov/connect-socal-2020>.

SCAG. 2024a. *Connect SoCal 2024: The 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments*. Adopted April 4, 2024. <https://scag.ca.gov/sites/default/files/2024-05/23-2987-connect-socal-2024-final-complete-040424.pdf> SCAG. 2024b. "Demographics & Growth Forecast." Technical report, *Connect SoCal 2024*. Adopted April 4, 2024. <https://scag.ca.gov/connect-SoCal-2024>.

---

# 3 Changes to the Draft Supplemental Environmental Impact Report

## 3.1 Introduction

As provided in Section 15088(c) of the California Environmental Quality Act (CEQA) Guidelines, responses to comments may take the form of a revision to a draft environmental impact report (EIR) or may be a separate section in a Final EIR. This chapter of the Final Supplemental EIR (SEIR) complies with the latter option and provides changes to the Draft SEIR in strikethrough text (i.e., ~~strikethrough~~) signifying deletions, and underlined text (i.e., underline) signifying additions. These notations are meant to provide clarification, corrections, or minor revisions identified during the review period or as a result of public comments received for the proposed Site B-2 Hotel Project (Project) since the release of the Draft SEIR, as required by Section 15132 of the CEQA Guidelines. None of the corrections or additions constitutes significant new information or substantial Project changes requiring recirculation of the SEIR, as defined by Section 15088.5 of the CEQA Guidelines.

## 3.2 Changes to the Draft SEIR

### 3.2.1 Changes to the Table of Contents, Tables

List of Tables, pages TOC-iii, TOC-iv<sup>1</sup>

#### **TABLES**

<u>1-1</u>	<u>Summary of Environmental Impacts and Mitigation Measures</u> .....	<u>1-7</u>
<u>1-2</u>	<u>Comparison of Project and Alternatives</u> .....	<u>1-31</u>
2-1	NOP Comments .....	2-5
3-1	Surrounding Land Uses and Designations .....	3-2
3-2	Construction Equipment Assumptions .....	3-3
3-3	Project Components.....	3-4
4-1	Geographic Scope and Method of Evaluation for Cumulative Impacts .....	4-2
4.1-1	Greenhouse Gas Emissions Sources in California .....	4.1-4
4.1-2	CalEEMod Land Use Development Summary .....	4.1-27
4.1-3	Construction Scenario <del>Phasing</del> .....	4.1-28
4.1-4	Estimated Annual Construction Greenhouse Gas Emissions – Unmitigated .....	4.1-34
4.1-5	Estimated Annual Operational Greenhouse Gas Emissions – 2028 – Unmitigated .....	4.1-35
<u>4.1-6</u>	<u>Project Potential to Conflict with Connect SoCal 2024</u> .....	<u>4.1-36</u>
<u>4.1-7</u>	<u>Project Potential to Conflict with 2022 Scoping Plan</u> .....	<u>4.1-54</u>

---

<sup>1</sup> The tables shown as underlined in this section were included in the Draft SEIR. This correction is made to the Table of Contents because tables were inadvertently omitted from the Draft SEIR’s Table of Contents.

4.1-8 Project Potential to Conflict with City of Garden Grove General Plan .....4.1-57

4.1-9 Estimated Annual Construction Greenhouse Gas Emissions – Mitigated.....4.1-82

4.1-10 Estimated Annual Operational Greenhouse Gas Emissions – 2028 – Mitigated .....4.1-82

4.1-11 Estimated Annual Construction Greenhouse Gas Emissions – Mitigated plus Carbon Offsets.....4.1-89

4.1-12 Estimated Annual Operational Greenhouse Gas Emissions – 2028 – Mitigated plus Carbon Offsets.....4.1-89

4.2-1 Project Generated OD VMT per Service Population .....4.2-15

4.2-2 Project Generated PA or Home Based Work VMT per Employee .....4.2-15

4.2-3 Project Effect on VMT.....4.2-16

4.2-4 VMT Reduction for Project Generated VMT per Employee .....4.2-18

6-1 Summary of Alternative 1 Success at Meeting Project Objectives ..... 6-7

6-2 Reduced Project Alternative Estimated Annual Construction Greenhouse Gas Emissions – Unmitigated.....6-10

6-3 Reduced Project Alternative Estimated Annual Operational Greenhouse Gas Emissions – 2028 – Unmitigated .....6-10

6-4 Comparison of the Project and Reduced Project Alternative Estimated Annual Greenhouse Gas Emissions – 2028 – Unmitigated .....6-11

6-5 Summary of Alternative 2 Success at Meeting Project Objectives .....6-13

6-6 Comparison of Project and Alternatives .....6-15

### 3.2.2 Changes to Chapter 1, Executive Summary

#### 1.4.3, Project Design Features, page 1-3

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

PDF-28 The Project amenities shall be available to registered hotel guests only. There will be no day passes allowed.

PDF-29 The Project amenities include a self-service bicycle repair station adjacent to the guest and employee bicycle parking spaces.

#### 1.6, Areas of Known Controversy, page 1-6 (bulleted list)

- Request for the Project to rely on the South Coast Air Quality Management District’s CEQA guidance and evaluate all phases of the Project and air pollutant sources
- Request for the Project applicant/Applicant to consider including a Transportation Demand Management analysis within the EIR and implementation of appropriate detours, signage, and safety measures for pedestrians and bicyclists in the construction phase and encouragement of Complete Street design

- Request that the City should clarify what environmental review is being supplemented and receipt of all notices concerning any CEQA/land use actions associated with the Project

### 1.8, Summary of Environmental Impacts and Mitigation, pages 1-7 through 1-27

Table 1-1 summarizes the conclusions of the environmental analysis contained in this SEIR. Table 1-1 provides a complete list of the project's environmental impacts including the level of significance before and after mitigation, based on the analysis and conclusions presented in Chapter 4 of this SEIR. Each mitigation measure includes the corresponding California Air Pollution Control Officers' Association (CAPCOA) alphanumeric designation for the measure in italics immediately following the mitigation text to indicate alignment with recognized VMT and GHG best practices. The potentially significant impacts related to VMT and conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs can be reduced to less than significant through incorporation of mitigation measures identified in Chapter 4 (see Impact GHG-2 and Impact TRA-1 in Section 4.1, Greenhouse Gas Emissions and Section 4.2, Transportation). The Project would result in significant unavoidable Project and cumulative impacts to GHG emissions, even with the implementation of identified mitigation measures (see Impact GHG-1 Section 4.1, and Table 1-1 for details).

### 1.8, Table 1-1, pages 1-6 through 1-27

**MM-GHG-1. ~~Construction Equipment Electrification~~~~Electric Construction Equipment~~.** Prior to issuance of building permits, the Project Applicant's or designee's contractor shall submit a Construction Equipment Emissions Minimization Plan for City of Garden Grove (City) approval that:

- (1) Identifies all off-road equipment anticipated by phase.
- (2) Requires generators, cranes, electric scissor/boom lifts, forklifts/telehandlers (where feasible), welders (where feasible), and electric/solar light towers when commercially available.
- (3) Requires grid power for temporary construction power.
- (4) Where electric equipment is not available for a listed task, documents non-availability (size/class, delivery lead time, site constraints) and requires the cleanest feasible alternative (Tier 4 Final/zero-emission alternatives as available).

In addition, the Project shall limit air compressors used during the architectural coating/painting phase to equipment that is electric-powered. Compliance shall be demonstrated through equipment lists, rental records, and weekly logs and shall be summarized in a post-construction compliance memo for the Supplemental Mitigation Monitoring and Reporting Program (Supplemental MMRP) file. applicant or designee shall submit documentation to the City of Garden Grove that temporary power will be established to the Project site during vertical construction. All generator(s) and crane(s) shall be electric-powered. In addition, the Project shall limit air compressors used during the architectural coating/painting phase to equipment that is electric-powered. (CAPCOA Measure C-1-A)

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

**MM-GHG-3. Construction Debris Recycling.** Prior to the start of construction, the Project's contractor shall develop a Construction Waste Management Plan (Plan) for submittal and approval to the City of Garden Grove. The

~~Construction Waste Management Plan shall recycle or salvage non-hazardous construction debris such that a minimum target of 75% is achieved. This will exceed the City's current target of 65% diversion, including but not limited to wood, metal, concrete, asphalt, and other reusable materials generated during construction activities. The Plan shall also include provisions for salvaging wood materials for reuse in furniture, engineered wood products, mulch, or other applications. The contractor shall implement the Plan to achieve a minimum diversion target of 75% of non-hazardous construction and demolition debris from landfills, exceeding the City's current 65% diversion requirement. (CAPCOA Measure S-4)~~

**MM-GHG-4. Electric Vehicle Charging Infrastructure.** Prior to issuance of building permits, the Project ~~applicant~~ Applicant or designee shall submit a site plan to the City of Garden Grove for approval noting the location of electric vehicle infrastructure and charging stations. Prior to issuance of the final certificate of occupancy, the Project ~~applicant~~ Applicant or designee shall provide electric vehicle (EV) charging infrastructure within the Project site as required by the applicable California Green Building Standards Code, but that, at a minimum, meets or exceeds 2022 California Green Building Standards Code Tier 2 standards. Tier 2 requires approximately 225 parking spaces to be EV capable, and 75 spaces to be equipped with EV Supply Equipment (EVSE). The Project shall install a minimum of 225 EV capable spaces and 100 EVSE spaces. (CAPCOA Measure T-14)

**MM-GHG-5. Guest Vehicle Trip Reductions.** Prior to issuance of building permits, the Project ~~applicant~~ Applicant shall submit a site plan to the City of Garden Grove for approval identifying where pedestrian and bicycle connections to adjacent facilities will be provided and where bicycle parking spaces will be provided. The City shall verify the inclusion of pedestrian and bicycle infrastructure prior to the issuance of the final certificate of occupancy. The Project ~~applicant~~ Applicant or designee shall ensure that, at a minimum, the following trip reduction measures are implemented during Project operations to reduce the number of auto-based trips generated by the Project and to encourage the use of transit, bicycling, and walking.

- Improve the walkability and design of the Project by providing pedestrian and bicycling connections within the Project site and to adjacent off-site facilities (i.e., sidewalks, crosswalks, wayfinding signage, etc.).
- Provide secure on-site bicycle racks to accommodate a minimum of 38 bicycle parking spaces and provide bicycle rentals for hotel guests.
- Alternative transportation services such bike rentals and transit information shall be seamlessly integrated into the guest experience, making alternative modes of travel easy to understand, access, and use.
- Hotel management/concierge should provide information that promotes walking, bicycling and public transit options to nearby attractions. This should include real-time transit information provided through dedicated monitors, interactive electronic displays, websites, or mobile applications identifying on-local bus routes and schedules, and as well as wayfinding to the existing transit stops along Harbor Boulevard within the Project vicinity.
- Provide a shuttle service linking the hotel to nearby shopping and entertainment destinations, prioritizing battery-electric vehicles where route length and charging logistics allow; the program may be operated under a vendor contract with scheduled runs during peak guest activity and on-demand service for special events.
- Hotel management will make available transit -passes for purchase and provide clear wayfinding to public transit and shuttle service.
- Qualitative assessments (e.g., user satisfaction surveys, walk audits, guest feedback) shall be regularly conducted to evaluate the effectiveness of trip reduction strategies.

- An annual report summarizing how transportation options are being used, guest perceptions, and planned improvements shall be submitted to the City.

*(CAPCOA Measures T-34, T-38, T-43, and T-44)*

**MM-GHG-6. Limit Large Diesel Trucks During Operation.** Prior to issuance of certificate of occupancy, the Project ~~Applicant~~ applicant or designee shall submit a Truck Delivery Management Plan to the City of Garden Grove that documents how truck deliveries will be restricted and monitored. The Project ~~applicant~~ Applicant or designee shall implement a monitoring program to restrict the number of large diesel trucks coming to the site (i.e. for deliveries, trash collection, or other services) to an average of 10 trucks per day or less. This restriction is specifically applicable to trucks classified as medium-heavy duty and heavy-heavy duty with gross vehicle weight (GVW) greater than 19,500 pounds. Annual reports summarizing heavy-duty truck trips shall be provided to the City of Garden Grove. *(CAPCOA Measure C-2)*

**MM-GHG-7. Building Energy Efficiency Measures.** Prior to issuance of building permits, the Project ~~applicant~~ Applicant or designee shall submit documentation of building energy efficiency measures to the City of Garden Grove, such that a minimum of 15% above 2022 Title 24 Building Envelope Energy Efficiency Standards is achieved. Energy efficiency measures shall include, at a minimum, the following:

1. LED Lighting – High-lumen LED light fixtures shall be used exclusively for the lighting of spaces throughout the Project that require 8 to 10 watts per fixture
2. Energy efficient lighting shall be incorporated into all on-site lighting and energy-efficient appliances shall be incorporated into Project operations.
3. HVAC Optimization – The HVAC system shall include the following:
  - a. ~~Heat~~ Electric heat pumps will be used for space heating and domestic hot water, with all systems integrated and monitored by the Project Building Management System for performance optimization, fault detection, and energy tracking to heat spaces and water using a heat exchanger and will be monitored by the Project Building Management System (BMS).
  - b. Smart thermostats, which include a motion sensor detector and door/window open sensors, will be installed in each guest room.
  - c. The central plant will utilize a Combination Plant with SmartPlate EV.
4. Glazing – All glazing for the tower and exterior public spaces shall be installed with Low-E glass [U-factor (thermal transmittance)  $\leq 0.28$  and Solar Heat Gain Coefficient (SHGC)  $\leq 0.23$ ].
5. Energy Management System – The Project shall use advanced systems to monitor and optimize energy use in real time.
6. Benchmarking and Monitoring – The Project shall incorporate an Energy Star Portfolio Management system to track and manage energy consumption
7. Third-Party Verification/LEED Certification – The Project shall obtain third-party HVAC commissioning verification or LEED certification of Gold to Platinum to verify energy savings
8. Battery Energy Storage – The Project would include an on-site battery energy storage system occupying approximately 500 to 1,000 square feet, consisting of modular lithium-ion battery cabinets and associated electrical equipment. The system would be used for peak load management and grid resiliency and consistent with California Fire Code and Title 24 requirements.

*(CAPCOA Measure E-1 is quantified; CAPCOA Measures E-7, E-9, E-22, E-24, and E-25 are qualitative)*

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

- Cool Roof Installation: All roofing materials shall meet or exceed the California Title 24, Part 6 requirements for cool roofs, based on roof slope:
  - Low-sloped roofs ( $\leq$  2:12 pitch):
    - Aged Solar Reflectance (SR)  $\geq$  0.63
    - Thermal Emittance (TE)  $\geq$  0.75
    - Or Solar Reflectance Index (SRI)  $\geq$  75
  - Steep-sloped roofs ( $>$  2:12 pitch):
    - Aged SR  $\geq$  0.20
    - TE  $\geq$  0.75
    - Or SRI  $\geq$  16
- Cool Deck Surfaces: All exterior hardscape surfaces exposed to sunlight (e.g., pool decks, patios, walkways) shall use high-albedo materials or cool surface coatings with:
  - Minimum SR of 0.29 or higher
  - Or materials with a demonstrated surface temperature reduction of at least 10°F compared to conventional concrete or asphalt

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

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

Monitoring and Reporting shall include:

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

(CAPCOA Measure E-21)

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

(CAPCOA Measure E-10-B)

**MM-GHG-10. Water Conservation.** Prior to receiving the final certificate of occupancy, the Project ~~Applicant~~ Applicant or designee shall submit a Water Conservation Compliance Report to the City of Garden Grove for review

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

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

*(CAPCOA Measures W-2, W-5, and W-7)*

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

- Recycling Program
  - ~~Labeled~~ Provide labeled bins for recyclables and certified hauler contracts.
  - Promote recycled paper and other products like soap.
- Organics and Composting Program
  - ~~Collection of~~ Collect food scraps and compostables.
- Source Reduction Measures
  - Reduce single-use items and paper use.
  - Ban disposable (i.e., designed to be used once and discarded) foodware items and accessories.
  - Allow customers to bring their own reusable items.
  - Require hand soap in refillable containers.
  - Do not provide water in plastic bottles or disposable single-use cups.
  - Do not use expanded polystyrene (i.e., Styrofoam).
  - Require reusable napkins and tablecloths with recyclable disposable napkins only for takeout.
  - Provide hand dryers in areas accessible to customers.
  - Require reusable laundry bags.
  - Require reusable dishware for room service.
  - Offer toiletries on request rather than automatically.
  - Provide key cards made of non-plastic materials, including traditional metal keys or wood, bamboo, and paper options for chip-based cards.
  - Incentivize returning keys to discourage waste.

- Provide non-plastic shower caps, razors, shaving cream, slippers, eye masks, and ear plugs.
- Remove minifridge items that use plastic.
- Eliminate the use of garbage bags if possible, or use garbage bags made of compostable material.
- Serve employee meals with reusable dishware and cutlery and provide reusable water bottles for all employees with accessible water bottle refill stations.
- Replace paper towels with reusable dish rags.
- Employee and Guest Education
  - Staff Provide staff training and signage for guests.
- Monitoring and Reporting
  - Track waste and submit Annual Waste Diversion Report to the City of Garden Grove.

In addition, if the hotel/operations qualify as a covered edible food generator, the Project will contract with a food recovery organization/service and keep required records. If not covered, the Project will evaluate a partnership during operator onboarding and implement if feasible. (CAPCOA Measure S-1/S-2; CAPCOA Measure S-3 is a qualitative measure in CalEEMod and is not quantified in the operational analysis)

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

### Electric-Powered Equipment

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

### Contractor Requirements

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

### On-Site Charging Infrastructure

- Install dedicated charging stations or outlets for landscape equipment.

## Equipment Inventory and Tracking

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

## Training and Education

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

### (CAPCOA Measure LL-1)

**MM-GHG-13. Prohibit Woodburning Devices, Natural Gas Fireplaces, and Fire Pits.** Prior to the issuance of building permits, the Project Applicant or designee shall submit building design plans for approval of the City showing the prohibition of on-site woodburning devices, natural gas fireplaces, fire pits, or other decorative combustion features throughout the Project site. Prior to the issuance of the final certificate of occupancy, the City shall confirm that this prohibition has been implemented.

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

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

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

## Mechanical Equipment

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

## Use of Low-GWP Refrigerants

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

## Leak Detection and Prevention

- Install automatic leak detection systems for large-capacity systems.

- Conduct quarterly inspections and maintain leak logs.

### Refrigerant Recovery and Disposal

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

### Preventive Maintenance Program

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

### Training and Certification

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

### Third-Party Verification

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

Prior to issuance of certificate of occupancy, the City of Garden Grove will verify that the equipment specified in the Refrigerant Management Program has been installed. Ongoing compliance shall be performed by the Project Applicant or their designee. (CAPCOA Measures R-1, R-4, R-5, R-6, and R-7)

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

### Timeline for Acquisition of Carbon Offset Credits

#### Construction

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

#### Operation

Prior to issuance of the final certificate of occupancy, the Project Applicant or its designee shall purchase and retire carbon offsets in a quantity sufficient to offset, for a 30-year period following occupancy of the Project, the construction and operational GHG emissions from Project to the 1,400 MT CO<sub>2</sub>e per year threshold, consistent with the quantification, performance standards and requirements set forth below. Alternatively, the Project Applicant or

its designee may purchase and retire annual operational GHG offsets for a period of 30 years by December 31 of the year preceding each new year after the issuance of the final certificate of occupancy. Annual operational GHG emission offsets shall also be subject to the same quantification, performance standards, and requirements set forth below.

### Quantification of GHG Emissions and Reductions Required-

#### Construction

The estimated total construction GHG emissions to be offset are 3,362.30 MT CO<sub>2</sub>e if purchased in a lump sum. If purchased on an annual basis, the following schedule provides the estimated annual emissions and date of compliance.

Year	Offsets Required (MT CO <sub>2</sub> e)	Purchase and Retirement Deadline
1	402.52	Prior to issuance of grading permits
2	1,434.02	December 31st of Year 1
3	1,410.81	December 31st of Year 2
4	114.95	December 31st of Year 3
<b>Total</b>	<b>3,362.30</b>	<u>N/A</u>

**Notes:** MT CO<sub>2</sub>e = metric tons of carbon dioxide equivalent; N/A = not applicable.

#### Operation

The estimated operational emissions are 7,408.02 MT CO<sub>2</sub>e. To mitigate operational emissions below the 1,400 MT CO<sub>2</sub>e threshold, the Project would purchase and retire one lump sum of 180,270.60 MT CO<sub>2</sub>e of offsets ([(7,408.02 MT CO<sub>2</sub>e - 6,009.02 [(offsets)]) = 1,399 MT CO<sub>2</sub>e remaining]; 6,009.02 MT CO<sub>2</sub>e × 30-year life = 180,270.60 MT CO<sub>2</sub>e; or purchase and retire 6,002.46 MT CO<sub>2</sub>e of offsets on an annual basis for 30 years. The following schedule provides the estimated offset emissions and dates of compliance under the scenarios where credits are purchased and retired in a lump sum or on an annual basis.

Scenario	Offsets Required (MT CO <sub>2</sub> e)	Purchase and Retirement Deadline
Lump Sum	180,270.60	Prior to issuance of certificate of occupancy
Annual Basis 30-year term	6,009.02	Prior to issuance of certificate of occupancy for Year 1 and December 31st of preceding year.

**Note:** MT CO<sub>2</sub>e = metric tons of carbon dioxide equivalent.

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

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

“Carbon offset” shall mean an instrument, credit or other certification verifying the reduction of GHG emissions issued by the following CARB-accredited registries: Climate Action Reserve, the American Carbon Registry, or Verra

(formerly, the Verified Carbon Standard); as well as credits issued for projects listed on the California Carbon Sequestration and Climate Resiliency Project Registry, which is maintained by the California Natural Resources Agency and may provide additional offsets. This shall include, but is not limited to, an instrument, credit or other certification issued by these registries for GHG reduction activities. The Project shall neither purchase offsets from the Clean Development Mechanism registry nor purchase offsets generated under Clean Development Mechanism protocols.

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

1. Adherence to established GHG accounting principles set forth in the International Organization for Standardization (ISO) 14064, Part 2 or the World Resources Institute/World Business Council for Sustainable Development (WRI/WBCSD) Greenhouse Gas Protocol for Project Accounting; and
2. Oversight of the implementation of protocols and methodologies that define the eligibility of carbon offset projects and set forth standards for the estimation, monitoring and verification of GHG reductions achieved from such projects. The protocols and methodologies shall:
  - a. Be developed by the registries through a transparent public and expert stakeholder review process that affords an opportunity for comment and is informed by science;
  - b. Incorporate standardized offset crediting parameters that define whether and how much emissions reduction credit a carbon offset project should receive, having identified conservative project baselines and the length of the crediting period and considered potential leakage and quantification uncertainties;
  - c. Establish data collection and monitoring procedures, mechanisms to ensure permanency in reductions, and additionality and geographic boundary provisions; and,
  - d. Adhere to the principles set forth in the program manuals of each of the aforementioned registries, as such manuals are updated from time to time. The current registry documentation, includes the Climate Action Reserve’s *Reserve Offset Program Manual*<sup>2</sup> (April 2024) and *Climate Forward Program Manual*<sup>3</sup> (December 2021); the American Carbon Registry’s *The ACR Standard, Requirements and Specifications for the Quantification, Monitoring, Reporting, Verification, and Registration of Project-Based GHG Emissions Reductions and Removals*<sup>4</sup> (July 2023); and, Verra’s *VCS Standard, Program Guide*<sup>5</sup> (August 2023) and *Methodology Requirements*<sup>6</sup> (October 2023).

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

The carbon offsets purchased to satisfy this measure must represent the reduction or sequestration of one MT CO<sub>2</sub>e that is “not otherwise required” (CEQA Guidelines Section 15126.4(c)(3)). The carbon offsets must achieve the standard of additional, real, permanent, quantifiable, verifiable, and enforceable reductions, which are defined

---

<sup>2</sup> <https://climateactionreserve.org/wp-content/uploads/2024/04/Reserve-Program-Manual-v9.2.pdf>

<sup>3</sup> [https://climateforward.org/wp-content/uploads/2021/12/Climate-Forward-Program-Manual-December-2021\\_12-FINAL.pdf](https://climateforward.org/wp-content/uploads/2021/12/Climate-Forward-Program-Manual-December-2021_12-FINAL.pdf)

<sup>4</sup> <https://acrcarbon.org/wp-content/uploads/2023/10/ACR-Standard-v8.0.pdf>

<sup>5</sup> <https://verra.org/documents/vcs-program-guide-v4-4/>

<sup>6</sup> <https://verra.org/documents/vcs-methodology-requirements-v4-4/>

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

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

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

Carbon offsets secured from the CARB-accredited registries shall be prioritized in accordance with the following criteria: (1) offsets within the City; (2) offsets within the County, only if in-City offsets are unavailable; (3) offsets within the State of California, only if in-county offsets are unavailable; (3) offsets within the United States, only if in-state offsets are unavailable.<sup>7</sup>

The above definitions are provided as criteria and performance standards associated with the use of carbon offsets. Such criteria and performance standards are intended only to further construe the standards under CEQA for mitigation related to GHG emissions (see, e.g., State CEQA Guidelines Section 15126.4(a), (c)), and are not intended to apply or incorporate the requirements of any other statutory or regulatory scheme not applicable to the Project (e.g., the Cap-and-Trade Program).

<sup>7</sup> For purposes of this provision, offset credits will be deemed “unavailable” if they are either unobtainable generally from the CARB-accredited registries, or if on a per-unit basis if such a credit is otherwise available: (a) for offset credits within the City of Garden Grove, more than 2 times as costly as offset credits within the County of Orange, but not within the City of Garden Grove; (b) for offset credits within the County of Orange, more than 5 times as costly as offset credits within California, but not within the County of Orange; or (c) for offset credits within the United States, sufficient offset credits within California are available for purchase at any cost.

## Monitoring, Reporting and Enforcement Standards

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

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

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

If the City determines that the Project's carbon offsets do not meet the requirements of this mitigation measure, the City shall provide a detailed explanation of the basis for the City's determination. Carbon offsets not approved by the City as meeting the requirements of this mitigation measure cannot be used to reduce Project GHG emissions and the Applicant will be required to submit qualifying carbon offsets accepted by the City prior to the applicable timeframe specified in the first section of this mitigation measure. (CAPCOA Measure M-2)

### 1.8, Summary of Environmental Impacts and Mitigation, pages 1-27 through 1-29

**MM-TRA-1. Implement Commute Trip Reduction Marketing (T-7):** The Project applicantApplicant shall implement a marketing strategy to promote the Project site employer's Commute Trip Reduction (CTR) program. Information sharing and marketing promote and educate employees about their travel choices to the employment location beyond driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT and GHG emissions.

However, to ensure that CTR achieves VMT reduction of at least 4%, the following measures will be incorporated:

- a) The ~~applicant~~ Applicant shall provide on-site or online commuter information services to employees. The ~~applicant~~ Applicant shall also distribute a quarterly newsletter with tips, success stories and updates to ensure education and encouragement for the CTR program.
- b) The CTR shall require the Project ~~applicant~~ Applicant or their designee to appoint a Commute Program Coordinator to oversee the implementation and management of the marketing strategy.
- c) The ~~applicant~~ Applicant shall ensure on-site or online subsidized transit pass sales are available to all employees.
- d) The ~~applicant~~ Applicant shall provide guaranteed ride home service by matching employees with other employees or providing access to platforms such as Rideharing.com and Lyft ~~which that~~ connect riders for daily commutes with nearby drivers.
- e) A minimum of 10 preferential parking spaces for carpools/vanpools shall be provided.

(CAPCOA Measures T-7, T-9-B)

**MM-TRA-2. Provide End-of-Trip Bicycle Facilities (T-10):** The Project shall install and maintain end-of-trip bicycle facilities for employee use. End-of-trip facilities include bike parking, bike lockers, showers, and personal lockers. The provision and maintenance of secure bike parking and related facilities encourages commuting by bicycle, thereby reducing VMT and GHG emissions. The Project design includes on-site bicycle racks to accommodate a minimum of 38 short-term bicycle parking spaces and provide bicycle rentals for hotel guests on the ground level and 32 secure long-term bicycle parking spaces for employees; and additionally, locker and shower facilities will be provided for employees. ~~Although it is not a mandatory requirement, the Applicant shall install a self-service bicycle repair station adjacent to the guest and employee bicycle parking spaces.~~ (CAPCOA Measure T-10)

### 3.2.3 Changes to Chapter 3, Project Description

#### Section 3.4.3, Project Design Features

The following summarizes the Project Design Features (PDFs) that are incorporated into the Project relative to the analysis in this SEIR and that will be included in the conditions of approval and/or Supplemental Mitigation Monitoring and Reporting Program (MMRP). It should be noted that all the following PDFs are qualitative/supporting measures. Therefore, for purposes of quantifying the Project's GHG emissions, no GHG reductions were taken from implementation of these measures.

PDF-28 The Project amenities shall be available to registered hotel guests only. There will be no day passes allowed.

PDF-29 The Project amenities include a self-service bicycle repair station adjacent to the guest and employee bicycle parking spaces.

### 3.2.4 Changes to Section 4.1, Greenhouse Gas Emissions

#### Section 4.1.4, Approach and Methodology, page 4.1-26

The California Emissions Estimator Model (CalEEMod) 2022 Version 2022.1.1.30 was used to estimate emissions from construction and operation of the Project (CAPCOA 2022). CalEEMod is a computer model developed in

cooperation with air districts throughout the state to quantify criteria air pollutant and GHG emissions associated with construction activities and operation of a variety of land use projects. CalEEMod input parameters, including the land use type used to represent the Project and its size, construction schedule, and anticipated use of construction equipment, were based on the experience of GHG experts and information provided by the City, or the applicant/Applicant, or relevant default model assumptions where Project specifics were unavailable.

#### Section 4.1.5, Project Design Features Previously Approved, page 4.1-31

The following summarizes the previously approved GHG related Pproject Ddesign Ffeatures (PDFs) that are incorporated into the Project. It should be noted that all the following PDFs are qualitative/supporting measures. Therefore, for purposes of quantifying the Project’s GHG emissions and the potential significance of impacts, no GHG reductions were taken based on the implementation of these measures. A notation is provided in italics where these PDFs are based on a specific CAPCOA measure included in CalEEMod.

#### Section 4.1.5, Project Design Features Previously Approved, “Construction,” pages 4.1-31 through 4.1-32

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

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

PDF-5 All construction vehicles should be prohibited from excessive idling. Excessive idling is defined as 5 minutes or longer. *(CAPCOA Measure C-2)*

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

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

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

#### Section 4.1.6, New Project Design Features, page 4.1-33

PDF-27 Sustainable Building Materials and Contracting. The Project will prioritize low-impact, sustainably sourced, and recyclable materials across construction and interior finishes, including low-VOC paints, Forest Stewardship Council-certified wood, and recycled-content flooring. The Project is also implementing vendor standards that require environmental product declarations and third-party certifications to verify material sustainability. Materials shall be selected not only

for their initial environmental footprint but also for durability and long-term performance, reducing the need for frequent replacement and associated waste.

In addition, the Project Applicant or their designee will include bid language requiring the contractor to prioritize sourcing within the region (e.g., Orange County/Southern California) where pricing and availability are competitive, and to document major material and subcontractor origins in the construction closeout package.

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

#### **Section 4.1.7, Impacts Analysis, Threshold GHG-1, “Level of Significance Before Mitigation,” page 4.1-35**

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

#### **Section 4.1.7, Impacts Analysis, Threshold GHG-2, “Potential to Conflict with SCAG’s RTP/SCS (Connect SoCal),” page 4.1-36**

In April 2024, SCAG adopted the 2024–2050 RTP/SCS, also referred to as Connect SoCal 2024 which builds upon the prior RTP/SCS. Connect SoCal 2024 includes regional planning policies in the following categories: Mobility, Communities, Environment, and Economy. A key component of Connect SoCal is the strategic location of housing to reduce vehicle miles traveled (VMT) by placing residential development close to jobs, services, and transit. Consistent with SB 375, the primary objective of the RTP/SCS is to guide future regional growth patterns—including the location of new residential and non-residential land uses—and transportation investments in order to achieve the state’s GHG reduction goals.

CAPCOA transportation-related measures such as T-1 (Increase Residential Density) and T-4 (Integrate Affordable and Below Market Rate Housing) are intended to support these objectives by providing strategies for siting and designing residential projects in a manner that minimizes VMT. These measures focus on increasing housing opportunities near employment centers, transit, and services, thereby reducing auto dependency. While Connect SoCal emphasizes the importance of strategically located housing at a regional level, Connect SoCal 2024 does not require the inclusion of housing within commercially designated areas for a project to be deemed consistent. Furthermore, CAPCOA Measures T-1 and T-4 are explicitly applicable to residential development and do not require or obligate commercial projects to incorporate housing uses. Because the Proposed Project is a commercial project, these residential-focused measures are not applicable. The primary objective of the RTP/SCS is to provide guidance for future regional growth (i.e., the location of new residential and non-residential land uses) and transportation patterns throughout the region, as stipulated under SB 375 to achieve compliance with the State’s GHG reduction goals. The Connect SoCal 2024 policies are evaluated in Table 4.1-6 below.

Section 4.1.7, Impacts Analysis, Threshold GHG-2, “Potential to Conflict with SCAG’s RTP/SCS (Connect SoCal),” Table 4.1-6, Table Subheading “Transportation System Management,” Policy No. 12, Column “Potential to Conflict,” page 4.1-37

**Not applicable.** This transportation system operational improvement policy is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. As such this policy does not apply to a single project applicant like the Project ~~applicant~~Applicant.

Section 4.1.7, Impacts Analysis, Threshold GHG-2, “Potential to Conflict with SCAG’s RTP/SCS (Connect SoCal),” Table 4.1-6, Table Subheading “Priority Development Areas,” Policy No. 32, Column “Potential to Conflict,” page 4.1-41

**No conflict.** The Project is located on an infill site that is zoned for commercial use. The inclusion of housing within a commercial-designated area is not required by Connect SoCal to be deemed consistent. The Project would provide employment opportunities along a major transportation corridor near existing transit.

Section 4.1.7, Impacts Analysis, Threshold GHG-2, “Potential to Conflict with SCAG’s RTP/SCS (Connect SoCal),” Table 4.1-6, Table Subheading “Housing the Region,” Policy No. 35, Column “Potential to Conflict,” page 4.1-41

**Not applicable.** This policy is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. The inclusion of housing within a commercial-designated area is not required by Connect SoCal to be deemed consistent. Notably, the Project is located on an infill site that is General Plan designated for visitor serving uses of the kind proposed by the Project. The City’s General Plan designates other areas within the City to satisfy local and regional housing needs.

Section 4.1.7, Impacts Analysis, Threshold GHG-2, “Potential to Conflict with SCAG’s RTP/SCS (Connect SoCal),” Table 4.1-6, Table Subheading “Housing the Region,” Policy No. 36, Column “Potential to Conflict,” page 4.1-43

**Not applicable.** This policy is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. As such they are beyond the control of a single project applicant. The inclusion of housing within a commercial-designated area is not required by Connect SoCal to be deemed consistent. The Project would offer employment opportunities near a major transportation corridor near existing transit consistent with the General Plan. The City’s General Plan designates other areas within the City to satisfy local and regional housing needs.

Section 4.1.7, Impacts Analysis, Threshold GHG-2, “Potential to Conflict with SCAG’s RTP/SCS (Connect SoCal),” Table 4.1-6, Table Subheading “Housing the Region,” Policy No. 37, Column “Potential to Conflict,” page 4.1-42-43

**Not applicable.** This policy is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. The inclusion of affordable housing within a commercial-designated area is not required by Connect SoCal to be deemed consistent. The Project is located on an infill site that is General Plan designated for the visitor serving uses contemplated by the Project. The City’s General Plan designates other areas within the City to satisfy local and regional housing needs.

**Section 4.1.7, Impacts Analysis, Threshold GHG-2, “Potential to Conflict with SCAG’s RTP/SCS (Connect SoCal),” Table 4.1-6, Table Subheading “Housing the Region,” Policy No. 38, Column “Potential to Conflict,” page 4.1-43**

**Not applicable.** This policy is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. The Project does not require the displacement of existing housing, and the Project site is General Plan designated for the visitor serving uses contemplated by the Project. The inclusion of housing within a commercial-designated area is not required by Connect SoCal to be deemed consistent. The City’s General Plan designates other areas within the City to satisfy local and regional housing needs.

**Section 4.1.7, Impacts Analysis, Threshold GHG-2, “Potential to Conflict with SCAG’s RTP/SCS (Connect SoCal),” Table 4.1-6, Table Subheading “Housing the Region,” Policy No. 39, Column “Potential to Conflict,” page 4.1-43**

**Not applicable.** This policy is more aspirational rather than an enforceable standard or requirement for individual projects. The Project is located on an infill site that is General Plan designated for the visitor serving uses contemplated by the Project. The inclusion of housing within a commercial-designated area is not required by Connect SoCal to be deemed consistent. The City’s General Plan designates other areas within the City to satisfy local and regional housing needs.

**Section 4.1.7, Impacts Analysis, Threshold GHG-2, “Potential to Conflict with SCAG’s RTP/SCS (Connect SoCal),” Table 4.1-6, Table Subheading “Housing the Region,” Policy No. 40, Column “Potential to Conflict,” page 4.1-43-44**

**Not applicable.** This policy is more aspirational rather than an enforceable standard or requirement for individual projects. This policy is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. The Project is located on an infill site that is General Plan designated for the visitor serving uses contemplated by the Project. The inclusion of housing within a commercial-designated area is not required by Connect SoCal to be deemed consistent. The City’s General Plan designates other areas within the City to satisfy local and regional housing needs.

**Section 4.1.7, Impacts Analysis, Threshold GHG-2, “Potential to Conflict with SCAG’s RTP/SCS (Connect SoCal),” Table 4.1-6, Table Subheading “Housing the Region,” Policy No. 41, Column “Potential to Conflict,” page 4.1-43**

**Not applicable.** This policy is more aspirational rather than an enforceable standard or requirement for individual projects. This policy is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. The Project is located on an infill site that is General Plan designated for the visitor serving uses contemplated by the Project. The inclusion of housing within a commercial-designated area is not required by Connect SoCal to be deemed consistent. The City’s General Plan designates other areas within the City to satisfy local and regional housing needs.

**Section 4.1.7, Impacts Analysis, Threshold GHG-2, “Potential to Conflict with SCAG’s RTP/SCS (Connect SoCal),” Table 4.1-6, Table Subheading “15-Minute Commutes,” Policy No. 43, Column “Potential to Conflict,” page 4.1-43**

**Not applicable.** This policy is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. It is also more aspirational rather than an enforceable standard or requirement for individual projects. The Project is located on an infill site that is General Plan designated for the visitor serving uses contemplated by the Project. The Project would offer employment opportunities near a major transportation corridor near existing transit. The inclusion of housing within a commercial-designated area is not required by Connect SoCal to be deemed consistent.

**Section 4.1.7, Impacts Analysis, Threshold GHG-2, “Potential to Conflict with SCAG’s RTP/SCS (Connect SoCal),” Table 4.1-6, Table Subheading “Climate Resilience,” Policy No. 68, Column “Potential to Conflict,” page 4.1-43**

**Not applicable.** This policy is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. As such they are beyond the control of a single project applicant.

The Project does not preclude SCAG’s ability to support integrated planning approaches for developing more housing in drier environments. The inclusion of housing within a commercial-designated area is not required by Connect SoCal to be deemed consistent. The Project is located within a commercial district specifically designated as a location for visitor serving uses like the Project. Additionally, the Project includes water conservation measures such as MM-GHG-10, which would support this policy.

**Section 4.1.7, Impacts Analysis, Threshold GHG-2, “Potential to Conflict with SCAG’s RTP/SCS (Connect SoCal),” Table 4.1-6, Table Subheading “Clean Transportation,” Policy No. 55, Column “Potential to Conflict,” page 4.1-47**

**Not applicable.** This is a region wide measure; however, the Project would not limit SCAG’s ability to promote the equitable use of and access to clean transportation technologies.

**Section 4.1.7, Impacts Analysis, Threshold GHG-2, “Potential to Conflict with SCAG’s RTP/SCS (Connect SoCal),” Table 4.1-6, Table Subheading “Clean Transportation,” Policy No. 56, Column “Potential to Conflict,” page 4.1-47**

**Not applicable.** This policy is designed to be implemented at a regional scale and requires coordination among multiple jurisdictions, agencies, and stakeholders. As such they are beyond the control of a single project applicant.

**Section 4.1.7, Impacts Analysis, Threshold GHG-2, “Potential to Conflict with State Reduction Targets and CARB’s Scoping Plan,” Table 4.1-7, Table Subheading “Sector”, Transportation,” Smart Growth/VMT, Column “Potential to Conflict,” page 4.1-58**

**No conflict with mitigation.** The VMT goals outlined in the Scoping Plan are being pursued through a multi-prong approach that includes transforming land use and mobility options. The State is encouraging compact, infill development near high quality transit corridors to reduce VMT. The Scoping Plan does not require housing to be included within commercially zoned areas for development to be consistent with these goals. Rather, it supports a

mix of land uses across the region that collectively reduce travel demand. The Project would not obstruct or interfere with agency efforts to meet this regional VMT reduction goal, including through implementation of SB 375.

The Project is a General Plan land use consistent infill commercial development within a TPA [it is located within half a mile of a major transit stop (Harbor Boulevard and Chapman Avenue intersection), based on the frequency of bus services in the City]. These characteristics would be considered smart growth and supportive of the State's approach for achieving these VMT targets. However, as disclosed in Section 4.2 of the SEIR, the Project would have a potentially significant VMT impact which would result in a potential conflict with this strategy. The Project would implement TRA-1 and TRA-2 to reduce the VMT impact to a less than significant level. With the implementation of these mitigation measures, the Project would not conflict with this strategy.

**Section 4.1.7, Impacts Analysis, Threshold GHG-2, "Potential to Conflict with City of Garden Grove General Plan," Table 4.1-8, Table Subheading "Air Quality Element", "Goal AQ-5," , Column "Potential to Conflict," page 4.1-54-55**

**No conflict with mitigation.** The Project would construct a new resort hotel use within an infill developed area that is General Plan designated for such a visitor serving use within a TPA. These characteristics would support this goal, however without the inclusion of measures to reduce GHG emissions, the Project would potentially conflict with this goal.

The Project incorporates project design features and MM-GHG-1 through MM-GHG-14 to reduce emissions from construction and operation of the Project. With implementation of these measures, the Project would not conflict with this policy.

The City's General Plan designates other areas within the City to satisfy local and regional housing needs, thus not including housing as part of the Project does not result in an inconsistency with the General Plan.

**Section 4.1.7, Impacts Analysis, Threshold GHG-2, "Potential to Conflict with City of Garden Grove General Plan," Table 4.1-8, Table Subheading "Air Quality Element", "Policy AQ-5.6," , Column "Potential to Conflict," page 4.1-54-55**

**No conflict.** The Project would construct a new commercial use near existing transit lines and major arterial corridors.

The City's General Plan designates other areas within the City to satisfy local and regional housing needs, thus not including housing as part of the Project does not result in an inconsistency with the General Plan.

**Section 4.1.7, Impacts Analysis, Threshold GHG-2, "Potential to Conflict with City of Garden Grove General Plan," Table 4.1-8, Table Subheading "Safety Element", "Policy SAF-10.10," , Column "Potential to Conflict," page 4.1-68-69**

**No conflict.** The Project does not interfere with the City's ability to implement this policy. While the Project is not mixed use, it does include jobs near existing transit within an infill urban area near residential and other commercial uses.

The City's General Plan designates other areas within the City to satisfy local and regional housing needs, thus not including housing as part of the Project does not result in an inconsistency with the General Plan.

**Section 4.1.7, Impacts Analysis, Threshold GHG-2, “Potential to Conflict with City of Garden Grove General Plan,” Table 4.1-8, Table Subheading “Circulation Element”, “Policy CIR-4.1,”, Column “Potential to Conflict,” page 4.1-70**

**No conflict.** The Project would not interfere with the City’s ability to implement this goal.

The Project would develop visitor serving uses on appropriately designated land within a TPA on a previously developed infill site. These Project characteristics would be supportive of this policy and thus would not conflict.

The City’s General Plan designates other areas within the City to satisfy local and regional housing needs, thus not including housing as part of the Project does not result in an inconsistency with the General Plan.

**Section 4.1.8, Mitigation Measures, Introduction, page 4.1-75**

Mitigation measures (MM) under CEQA are selected based on their ability to substantially lessen or avoid significant environmental impacts while considering feasibility. In CEQA, “feasible” means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors. The goal is to balance effective environmental protection with realistic implementation. A notation in italics is provided where these mitigation measures are attributable to a CAPCOA measure included in CalEEMod.

CAPCOA is a nonprofit professional association of air pollution control and air quality management district officers. It is not a state agency and does not have any regulatory authority. For this reason, CAPCOA measures are voluntary guidance tools, not mandatory regulatory requirements. The CAPCOA Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (CAPCOA 2024) is a resource that lead agencies and project applicants may consult when identifying and quantifying potential GHG emission reductions for CEQA compliance purposes, but it does not establish any legal or regulatory standards. Neither CEQA nor any state regulation requires a project to evaluate its consistency with, or to adopt measures in, CAPCOA’s guidance.

**Section 4.1.8, Mitigation Measures, “Construction (On-Site) Mitigation Measures,” page 4.1-76**

MM-GHG-1: Construction Equipment Electrification, Electric Construction Equipment: Prior to issuance of building permits, the Project applicant—Applicant’s or designee’s contractor shall submit a Construction Equipment Emissions Minimization Plan for City of Garden Grove (City) approval that:

- (1) Identifies all off-road equipment anticipated by phase.
- (2) Requires generators, cranes, electric scissor/boom lifts, forklifts/telehandlers (where feasible), welders (where feasible), and electric/solar light towers when commercially available.
- (3) Requires grid power for temporary construction power.
- (4) Where electric equipment is not available for a listed task, documents non-availability (size/class, delivery lead time, site constraints) and requires the cleanest feasible alternative (Tier 4 Final/zero-emission alternatives as available).

In addition, the Project shall limit air compressors used during the architectural coating/painting phase to equipment that is electric-powered Compliance shall be demonstrated through equipment lists, rental records, and weekly logs and shall be summarized in a post-construction compliance

memo for the Supplemental Mitigation Monitoring and Reporting Program (Supplemental MMRP) file, shall submit documentation to the City of Garden that temporary power will be established to the Project site during vertical construction. All generator(s) and crane(s) shall be electric powered. In addition, the Project shall limit air compressors used during the architectural coating/painting phase to equipment that is electric powered. (CAPCOA Measure C-1-A)

**MM-GHG-1** is quantified in the construction analysis. Because this is a conservative measure, only the generators, cranes, and air compressors are presumed to be electric to estimate potential emission reductions.

#### **Section 4.1.8, Mitigation Measures, pages 4.1-76 through 4.1-82**

**MM-GHG-3:** Construction Debris Recycling. Prior to the start of construction, the Project's contractor shall develop a Construction Waste Management Plan (Plan) for submittal and approval to the City of Garden Grove. The ~~Construction Waste Management Plan~~ Plan shall recycle or salvage non-hazardous construction debris, ~~such that a minimum target of 75% is achieved, including but not limited to wood, metal, concrete, asphalt, and other reusable materials generated during construction activities.~~ The contractor shall implement the Plan to achieve a minimum diversion target of 75% of non-hazardous construction and demolition debris from landfills, exceeding the City's current 65% diversion requirement. ~~This will exceed the City's current target of 65% diversion.~~ (CAPCOA Measure S-4)

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

#### **Operational (On-siteSite) Mitigation Measures**

**MM-GHG-4:** Electric Vehicle Charging Infrastructure. Prior to issuance of building permits, the Project ~~applicant~~ Applicant or designee shall submit a site plan to the City of Garden Grove for approval noting the location of electric vehicle infrastructure and charging stations. Prior to issuance of the final certificate of occupancy, the Project ~~applicant~~ Applicant or designee shall provide electric vehicle (EV) charging infrastructure within the Project site as required by the applicable California Green Building Standards Code, but that, at a minimum, meets or exceeds 2022 California Green Building Standards Code, Tier 2 standards. Tier 2 requires approximately 225 parking spaces to be EV capable, and 75 spaces to be equipped with EV Supply Equipment (EVSE). The Project shall install a minimum of 225 EV capable spaces and 100 EVSE spaces. (CAPCOA Measure T-14)

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

**MM-GHG-5:** Guest Vehicle Trip Reductions. Prior to issuance of building permits, the Project ~~applicant~~ Applicant shall submit a site plan to the City of Garden Grove for approval identifying where pedestrian and bicycle connections to adjacent facilities will be provided and where bicycle parking spaces will be provided. The City shall verify the inclusion of pedestrian and bicycle infrastructure prior to the issuance of the final certificate of occupancy. The Project ~~applicant~~ Applicant or designee shall ensure that, at a minimum, the following trip reduction measures are implemented during Project operations to reduce the number of auto-based trips generated by the Project and to encourage the use of transit, bicycling, and walking.

- Improve the walkability and design of the Project by providing pedestrian and bicycling connections within the Project site and to adjacent off-site facilities (i.e.g., sidewalks, crosswalks, wayfinding signage, etc.).
- Provide secure on-site bicycle racks to accommodate a minimum of 38 bicycle parking spaces and provide bicycle rentals for hotel guests.
- Alternative transportation services such bike rentals and transit information shall be seamlessly integrated into the guest experience, making alternative modes of travel easy to understand, access, and use.
- Hotel management/concierge should provide information that promotes walking, bicycling and public transit options to nearby attractions. This should include real-time transit information provided through dedicated monitors, interactive electronic displays, websites, or mobile applications identifying on-local bus routes and schedules, and as well as wayfinding to the existing transit stops along Harbor Boulevard within the Project vicinity.
- Provide a dedicated shuttle service linking the hotel to nearby shopping and entertainment destinations, prioritizing battery-electric vehicles where route length and charging logistics allow; the program may be operated under a vendor contract with scheduled runs during peak guest activity and on-demand service for special events.
- Hotel management will make available transit passes for purchase and provide clear wayfinding to public transit and shuttle services.
- Qualitative assessments (e.g., user satisfaction surveys, walk audits, guest feedback) shall be regularly conducted to evaluate the effectiveness of trip reduction strategies.
- An annual report summarizing how transportation options are being used, guest perceptions, and planned improvements shall be submitted to the City.

(CAPCOA Measures T-34, T-38, T-43, and T-44)

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

**MM-GHG-6:** Limit Large Diesel Trucks During Operation. Prior to issuance of certificate of occupancy, the Project ~~applicant~~ Applicant or designee shall submit a Truck Delivery Management Plan to the City of Garden Grove that documents how truck deliveries will be restricted and monitored. The Project ~~applicant~~ Applicant or designee shall implement a monitoring program to restrict the number of large diesel trucks coming to the site (i.e., for deliveries, trash collection, or other services) to an average of 10 trucks per day or less. This restriction is specifically applicable to trucks classified as medium-heavy duty and heavy-heavy duty with gross vehicle weight (GVW) greater than 19,500 pounds. Annual reports summarizing heavy-duty truck trips shall be provided to the City of Garden Grove. (CAPCOA Measure C-2)

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

**MM-GHG-7:** Building Energy Efficiency Measures. Prior to issuance of building permits, the Project ~~applicant~~ Applicant or designee shall submit documentation of building energy efficiency measures to the City of Garden Grove, such that a minimum of 15% above 2022 Title 24 Building Envelope Energy Efficiency Standards is achieved. Energy efficiency measures shall include, at a minimum, the following:

1. LED Lighting – High-lumen LED light fixtures shall be used exclusively for the lighting of spaces throughout the Project that require 8 to 10 watts per fixture.
2. Energy efficient lighting shall be incorporated into all on-site lighting and energy-efficient appliances shall be incorporated into Project operations.
3. HVAC Optimization – The HVAC system shall include the following:
  - a. Electric heat pumps will be used for space heating and domestic hot water, with all systems integrated and monitored by the Project Building Management System for performance optimization, fault detection, and energy tracking to heat spaces and water using a heat exchanger and will be monitored by the Project Building Management System (BMS).
  - b. Smart thermostats, which include a motion sensor detector and door/window open sensors, will be installed in each guest room.
  - c. The central plant will utilize a Combination Plant with SmartPlate EV.
4. Glazing – All glazing for the tower and exterior public spaces shall be installed with Low-E glass [U-factor (thermal transmittance)  $\leq 0.28$  and Solar Heat Gain Coefficient (SHGC)  $\leq 0.23$ .
5. Energy Management System – The Project shall use advanced systems to monitor and optimize energy use in real time.
6. Benchmarking and Monitoring – The Project shall incorporate an Energy Star Portfolio Management system to track and manage energy consumption.
7. Third-Party Verification/LEED Certification – The Project shall obtain third-party HVAC commissioning verification or LEED certification of Gold to Platinum to verify energy savings.
8. Battery Energy Storage – The Project would include an on-site battery energy storage system occupying approximately 500 to 1,000 square feet, consisting of modular lithium-ion battery cabinets and associated electrical equipment. The system would be used for peak load management and grid resiliency consistent with California Fire Code and Title 24 requirements.  
*(CAPCOA Measure E-1 is quantified; CAPCOA Measures E-7, E-9, E-22, E-24, and E25 are qualitative)*

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

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

- Cool Roof Installation: All roofing materials shall meet or exceed the California Title 24, Part 6 requirements for cool roofs, based on roof slope:
  - Low-sloped roofs ( $\leq 2:12$  pitch):
    - Aged Solar Reflectance (SR)  $\geq 0.63$
    - Thermal Emittance (TE)  $\geq 0.75$
    - Or Solar Reflectance Index (SRI)  $\geq 75$
  - Steep-sloped roofs ( $> 2:12$  pitch):
    - Aged SR  $\geq 0.20$
    - TE  $\geq 0.75$

- Or SRI  $\geq 16$
- Cool Deck Surfaces: All exterior hardscape surfaces exposed to sunlight (e.g., pool decks, patios, walkways) shall use high-albedo materials or cool surface coatings with:
  - Minimum SR of 0.29 or higher
  - Or materials with a demonstrated surface temperature reduction of at least 10°F compared to conventional concrete or asphalt

To meet the above standards, the Project Applicant may implement one or more of the following:

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

Monitoring and Reporting shall include:

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

(CAPCOA Measure E-21)

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

**MM-GHG-9:** Renewable Energy. The Project Applicant or designee shall install a solar photovoltaic system capable of generating a minimum of 267,000 kilowatt hours (kWh) per year prior to issuance of certificate of occupancy. (CAPCOA Measure E-10-B)

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

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

- Low-Flow Water Fixtures for guest rooms and public areas-

- Smart Irrigation System – outdoor landscaping shall include weather-based irrigation controllers and drought-resistant landscaping to minimize outdoor water use.
- Greywater Recycling:  
(CAPCOA Measures W-2, W-5, and W-7)

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

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

- Recycling Program
  - Provide labeled bins for recyclables and certified hauler contracts.
  - Promote recycled paper and other products like soap.
- Organics and Composting Program
  - ~~Collection of~~ food scraps and compostables.
- Source Reduction Measures
  - Reduce single-use items and paper use.
  - Ban disposable (i.e., designed to be used once and discarded) foodware items and accessories.
  - Allow customers to bring their own reusable items.
  - Require hand soap in refillable containers.
  - Do not provide water in plastic bottles or disposable single-use cups.
  - Do not use expanded polystyrene (i.e., Styrofoam).
  - Require reusable napkins and tablecloths with recyclable disposable napkins only for takeout.
  - Provide hand dryers in areas accessible to customers.
  - Require reusable laundry bags.
  - Require reusable dishware for room service.
  - Offer toiletries on request rather than automatically.
  - Provide key cards made of non-plastic materials, including traditional metal keys or wood, bamboo, and paper options for chip-based cards.
  - Incentivize returning keys to discourage waste.
  - Provide non-plastic shower caps, razors, shaving cream, slippers, eye masks, and ear plugs.
  - Remove minifridge items that use plastic.

- Eliminate the use of garbage bags if possible, or use garbage bags made of compostable material.
- Serve employee meals with reusable dishware and cutlery and provide reusable water bottles for all employees with accessible water bottle refill stations.
- Replace paper towels with reusable dish rags.
- Employee and Guest Education
  - Provide staff Staff training and signage for guests.
- Monitoring and Reporting
  - Track waste and submit Annual Waste Diversion Report to the City of Garden Grove.

In addition, if the hotel/operations qualify as a covered edible food generator, the Project will contract with a food recovery organization/service and keep required records. If not covered, the Project will evaluate a partnership during operator onboarding and implement if feasible. (CAPCOA Measure S-1/S-2; CAPCOA Measure S-3 is a qualitative measure in CalEEMod and is not quantified in the operational analysis)

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

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

### Electric-Powered Equipment

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

### Contractor Requirements

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

### On-Site Charging Infrastructure

- Install dedicated charging stations or outlets for landscape equipment.

### Equipment Inventory and Tracking

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

### Training and Education

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

(CAPCOA Measure LL-1)

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

**MM-GHG-13:** Prohibit Woodburning ~~d~~Devices, Natural Gas Fireplaces, and Fire Pits. Prior to the issuance of building permits, the Project ~~applicant~~ Applicant or designee shall submit building design plans for approval of the City showing the prohibition of on-site woodburning devices, natural gas fireplaces, fire pits, or other decorative combustion features throughout the Project site. Prior to the issuance of the final certificate of occupancy, the City shall confirm that this prohibition has been implemented.

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

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

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

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

### Mechanical Equipment

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

### Use of Low-GWP Refrigerants

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

### Leak Detection and Prevention

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

### Refrigerant Recovery and Disposal

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

### Preventive Maintenance Program

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

### Training and Certification

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

### Third-Party Verification

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

Prior to issuance of certificate of occupancy, the City of Garden Grove will verify that the equipment specified in the Refrigerant Management Program has been installed. Ongoing compliance shall be performed by the Project applicant-Applicant or their designee. (CAPCOA Measures R-1, R-4, R-5, R-6, and R-7)

**MM-GHG-14** is quantified in the operational analysis.

### Section 4.1.8, Mitigation Measures, “Carbon Offsets,” page 4.1-84

- The California Natural Resources Agency’s Final Statement Of Reasons For Regulatory Action for the CEQA Guidelines Amendments (2009) also supports the use of GHG credits: “Proposed subdivision (c)(3) recognizes the availability of various offsite mitigation measures. Such measures could include, among others, the purchase of carbon offsets, community energy conservation projects, and off-site forestry projects.”

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

Verra’s Verified Carbon Units (VCUs) are issued only after projects undergo a rigorous validation and verification process. Each VCU represents one ton of CO<sub>2</sub>e-equivalent emissions reduced or removed and must meet quality assurance principles ensuring that reductions are *real, measurable, additional, permanent, independently verified, conservatively estimated, uniquely numbered, and transparently listed*.

### Section 4.1.8, Mitigation Measures, “Carbon Offsets,” pages 4.1-84 through 4.1-89

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

#### Timeline for Acquisition of Carbon Offset Credits

##### Construction

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

##### Operation

Prior to issuance of the final certificate of occupancy, the Project Applicant or its designee shall purchase and retire carbon offsets in a quantity sufficient to offset, for a 30-year period following occupancy of the Project, the construction and operational GHG emissions from the Project to the 1,400 MT CO<sub>2</sub>e per year threshold, consistent with the quantification, performance standards and requirements set forth below. Alternatively, the Project Applicant or its designee may purchase and retire annual operational GHG offsets for a period of 30 years by December 31 of the year preceding each new year after the issuance of the final certificate of occupancy. Annual operational GHG emission offsets shall also be subject to the same quantification, performance standards, and requirements set forth below.

## Quantification of GHG Emissions and Reductions Required

### Construction

The estimated total construction GHG emissions to be offset are 3,362.30 MT CO<sub>2e</sub> if purchased in a lump sum. If purchased on an annual basis, the following schedule provides the estimated annual emissions and date of compliance.

Year	Offsets Required MT CO <sub>2e</sub>	Purchase and Retirement Deadline
1	402.52	Prior to issuance of grading permits
2	1,434.02	December 31 <sup>st</sup> of Year 1
3	1,410.81	December 31 <sup>st</sup> of Year 2
4	114.95	December 31 <sup>st</sup> of Year 3
<b>Total</b>	<b>3,362.30</b>	<b>N/A</b>

**Notes:** MT CO<sub>2e</sub> = metric tons of carbon dioxide equivalent; N/A = not applicable.

### Operation

The estimated operational emissions are 7,408.02 MT CO<sub>2e</sub>. To mitigate operational emissions below the 1,400 MT CO<sub>2e</sub> per year threshold, the Project would purchase and retire one lump sum of 180,270.60 MT CO<sub>2e</sub> of offsets [(7,408.02 MT CO<sub>2e</sub> - 1,400 MT CO<sub>2e</sub>) = 6,009.02 MT CO<sub>2e</sub> remaining]; 6,009.02 MT CO<sub>2e</sub> x 30-year life = 180,270.60 MT CO<sub>2e</sub>; or that same total amount of credits in increments over the 30 years. The following schedule provides the estimated offset emissions and dates of compliance under the scenarios where credits are purchased and retired in a lump sum or on an annual basis.

Scenario	Offsets Required MT CO <sub>2e</sub>	Purchase and Retirement Deadline
Lump Sum	180,270.60	Prior to issuance of certificate of occupancy
Annual Basis 30-year term	6,009.02	Prior to issuance of certificate of occupancy for Year 1 and December 31 <sup>st</sup> of preceding year.

**Note:** MT CO<sub>2e</sub> = metric tons of carbon dioxide equivalent.

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

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

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

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

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

1. Adherence to established GHG accounting principles set forth in the International Organization for Standardization (ISO) 14064, Part 2 or the World Resources Institute/World Business Council for Sustainable Development (WRI/WBCSD) Greenhouse Gas Protocol for Project Accounting; and
2. Oversight of the implementation of protocols and methodologies that define the eligibility of carbon offset projects and set forth standards for the estimation, monitoring and verification of GHG reductions achieved from such projects. The protocols and methodologies shall:
  - a. Be developed by the registries through a transparent public and expert stakeholder review process that affords an opportunity for comment and is informed by science;
  - b. Incorporate standardized offset crediting parameters that define whether and how much emissions reduction credit a carbon offset project should receive, having identified conservative project baselines and the length of the crediting period and considered potential leakage and quantification uncertainties;
  - c. Establish data collection and monitoring procedures, mechanisms to ensure permanency in reductions, and additionality and geographic boundary provisions; and;
  - d. Adhere to the principles set forth in the program manuals of each of the aforementioned registries, as such manuals are updated from time to time. The current registry documentation, includes the Climate Action Reserve’s *Reserve Offset Program Manual*<sup>8</sup> (April 2024) and *Climate Forward Program Manual*<sup>9</sup> (December 2021); the American Carbon Registry’s *The ACR Standard, Requirements and Specifications for the Quantification, Monitoring, Reporting, Verification, and Registration of Project-Based GHG Emissions Reductions and Removals*<sup>10</sup> (July 2023); and, Verra’s VCS Standard, *Program Guide*<sup>11</sup> (August 2023), and *Methodology Requirements*<sup>12</sup> (October 2023).

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

The carbon offsets purchased to satisfy this measure must represent the reduction or sequestration of one MT CO<sub>2</sub>e that is “not otherwise required” (CEQA Guidelines Section 15126.4(c)(3)). The carbon offsets must achieve the standard of additional, real, permanent, quantifiable, verifiable, and enforceable reductions, which are defined for purposes of this

---

<sup>8</sup> <https://climateactionreserve.org/wp-content/uploads/2024/04/Reserve-Program-Manual-v9.2.pdf>,

<sup>9</sup> [https://climateforward.org/wp-content/uploads/2021/12/Climate-Forward-Program-Manual-December-2021\\_12-FINAL.pdf](https://climateforward.org/wp-content/uploads/2021/12/Climate-Forward-Program-Manual-December-2021_12-FINAL.pdf),

<sup>10</sup> <https://acrcarbon.org/wp-content/uploads/2023/10/ACR-Standard-v8.0.pdf>,

<sup>11</sup> <https://verra.org/documents/vcs-program-guide-v4-4/>,

<sup>12</sup> <https://verra.org/documents/vcs-methodology-requirements-v4-4/>.

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

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

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

Carbon offsets secured from the CARB-accredited registries shall be prioritized in accordance with the following criteria: (1) offsets within the City; (2) offsets within the County, only if in-City offsets are unavailable; (3) offsets within the State of California, only if in-county offsets are unavailable; (3) offsets within the United States, only if in-state offsets are unavailable.<sup>13</sup>

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

---

<sup>13</sup> For purposes of this provision, offset credits will be deemed “unavailable” if they are either unobtainable generally from the CARB-accredited registries, or if on a per-unit basis if such a credit is otherwise available: (a) for offset credits within the City of Garden Grove, more than 2 times as costly as offset credits within the County of Orange, but not within the City of Garden Grove; (b) for offset credits within the County of Orange, more than 5 times as costly as offset credits within California, but not within the County of Orange; or (c) for offset credits within the United States, -sufficient offset credits within California are not available for purchase at any cost.

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

### **Monitoring, Reporting, and Enforcement Standards**

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

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

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

If the City determines that the Project's carbon offsets do not meet the requirements of this mitigation measure, the City shall provide a detailed explanation of the basis for the City's determination. Carbon offsets not approved by the City as meeting the requirements of this mitigation measure cannot be used to reduce Project GHG emissions and the Applicant will be required to submit qualifying carbon offsets accepted by the City prior to the applicable timeframe specified in the first section of this mitigation measure. *(CAPCOA Measure M-2)*

### 3.2.5 Changes to Section 4.2, Transportation

#### Section 4.2.5, Mitigation Measures, pages 4.2.17 and 4.2.18

To reduce the Project-generated VMT per Employee under baseline conditions, applicable VMT reduction measures from the Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, California Air Pollution Control Officers Association (CAPCOA), October 2024 were reviewed. The VMT reduction was calculated using the percentages recommended in the CAPCOA Handbook for the transportation-sector-related measures for the Project. The following mitigation measures have been incorporated to reduce the Project-generated VMT per employee:

MM-TRA-1 Implement Commute Trip Reduction Marketing (~~T-7~~): The Project ~~applicant~~ Applicant shall implement a marketing strategy to promote the Project site employer's Commute Trip Reduction (CTR) program. Information sharing and marketing promote and educate employees about their travel choices to the employment location beyond driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT and GHG emissions.

However, to ensure that CTR achieves VMT reduction of at least 4%, the following measures will be incorporated:

- a) The ~~Applicant~~ applicant shall provide on-site or online commuter information services to employees. The ~~Applicant~~ applicant shall also distribute a quarterly newsletter with tips, success stories, and updates to ensure education and encouragement for the CTR program.
- b) The CTR shall require the Project ~~Applicant~~ applicant or their designee to appoint a Commute Program Coordinator to oversee the implementation and management of the marketing strategy.
- c) The ~~Applicant~~ applicant shall ensure on-site or online subsidized transit pass sales are available to all employees.
- d) The ~~Applicant~~ applicant shall provide guaranteed ride home service by matching employees with other employees or providing access to platforms such as Rideharing.com and Lyft ~~which that~~ connect riders for daily commutes with nearby drivers.

e) A minimum of 10 preferential parking spaces for carpools/vanpools shall be provided. (CAPCOA Measures T-7 and T-9-B)

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

The implementation of **MM-TRA-1** results in the reduction of VMT per employee under baseline conditions from 15.3 to 14.69, and the implementation of **MM-TRA-2** further reduces the VMT per employee from 14.69 to 14.55.

This results in Project-Generated VMT per employee below the threshold of 14.60. These measures would also reduce the cumulative year VMT per employee, which is below the threshold of significance without any mitigation measures. Table 4.2-4 provides a summary for VMT reduction for the Project-Generated VMT per employee under Baseline plus Project conditions.

**Table 4.2-4. VMT Reduction for Project-Generated VMT per Employee**

Criteria	Value
Project-Generated VMT per Employee	15.30
County's Baseline VMT Threshold	14.65
% VMT Reduction Required	4.25%
<b>MM-TRA-1 (a,b,d,e):</b> Commute Trip Reduction <u>and</u> Marketing VMT Reduction	4.0%
<b>MM-TRA-2:</b> End-of-Trip Bicycle Facilities VMT Reduction	0.75%
% VMT Reduction <sup>1</sup> <u>a</u> Achieved with <b>MM-TRA-1 (a,b,d,e)</b> and <b>MM-TRA-2</b>	4.72%
-Project Generated VMT per Employee with VMT Reduction	14.58
Less than Significant Impact with MM Incorporated	<b>Yes</b>
<b>Additional VMT Reduction <u>a</u>Achieved by MM-TRA-1-(c)</b>	
<b>MM-TRA-1(c):</b> Implement Subsidized or Discounted Transit Program	0.17%
% VMT Reduction <sup>1</sup> <u>a</u> Achieved with <b>MM-TRA-1 (a,b,c,d,e)</b> and <b>MM-TRA-2</b>	4.88%
Project-Generated VMT per Employee with VMT Reduction	14.55

**Source:** VMT Reduction from Mitigation Measures, Appendix D.

**Notes:** VMT = vehicle miles traveled.

<sup>1</sup> VMT Reduction<sub>%</sub> = 1 - [(1 - 4%) \* (1 - 0.75%)] = 4.72%

<sup>2</sup> VMT Reduction<sub>%</sub> = 1 - [(1 - 4%) \* (1 - 0.75%) \* (1 - 0.17%)] = 4.88%

Table 4.2-4 demonstrates the amount of reduction required for the Project to result in a less than significant impact with mitigation under the Baseline Project-Generated VMT per employee. The reduction in VMT achieved by the mitigation measures would exceed the 4.25% reduction required and achieve a reduction of at least 4.72% as identified in Table 4.2-4. With the implementation of **MM-TRA-1(c)**, the VMT reduction achieved by the Project would be 4.88%.

**Section 4.2.6, Level of Significance After Mitigation, page 4.2.18**

With the implementation of **MM-TRA-1** and **MM-TRA-2**, the Project-Generated VMT per employee under Baseline conditions would result in a **less than significant** impact. As disclosed in Section 4.2.4 above, no mitigation is required for the Project to have **less than significant** impacts with respect to the Project-Generated VMT per service population under baseline and cumulative conditions, Project-Generated VMT per employee under cumulative conditions, and Project effect on VMT under baseline and cumulative conditions.

INTENTIONALLY LEFT BLANK

---

# 4 Supplemental Mitigation Monitoring and Reporting Program

## 4.1 Introduction

California Public Resources Code (PRC) Section 21081.6 requires that, upon certification of an environmental impact report (EIR), “the public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation” (PRC Sections 21000–21177).

This Supplemental Mitigation Monitoring and Reporting Program (MMRP) was developed in compliance with PRC Section 21081.6 and Section 15097 of the California Environmental Quality Act (CEQA) Guidelines (14 CCR 15000–15387), and includes the following information:

- A list of mitigation measures
- The timing for implementation of the mitigation measures
- The party responsible for implementing or monitoring the mitigation measures
- The date of completion of monitoring

The City of Garden Grove must adopt this Supplemental MMRP, or an equally effective program, if it approves the proposed Site B-2 Hotel Project (Project) with the mitigation measures that were adopted or made conditions of Project approval.

## 4.2 Supplemental MMRP Table

Table 4-1 presents the Supplemental MMRP, including the mitigation measures, timing for their implementation, the party or parties responsible for implementing or monitoring the mitigation measures, and date of completion. Each mitigation measure includes the corresponding California Air Pollution Control Officers’ Association (CAPCOA) measure in italics immediately following the mitigation text to indicate alignment with recognized VMT and GHG best practices. Project design features (PDFs) that are incorporated into the Project relative to the analysis in the Draft Supplemental EIR are also provided in the table.

**Table 4-1. Supplemental Mitigation Monitoring and Reporting Program**

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
<b>Greenhouse Gas Emissions</b>				
<b>Mitigation Measures</b>				
<p><b>MM-GHG-1: Construction Equipment Electrification.</b> Prior to issuance of building permits, the Project Applicant’s or designee’s contractor shall submit a Construction Equipment Emissions Minimization Plan for City of Garden Grove (City) approval that:</p> <p>(1) Identifies all off-road equipment anticipated by phase.                      (2) Requires generators, cranes, electric scissor/boom lifts, forklifts/telehandlers (where feasible), welders (where feasible), and electric/solar light towers when commercially available.                      (3) Requires grid power for temporary construction.                      (4) Where electric equipment is not available for a listed task, documents non-availability (size/class, delivery lead time, site constraints) and requires the cleanest feasible alternative (Tier 4 Final/zero-emission alternatives as available).</p> <p>In addition, the Project shall limit air compressors used during the architectural coating/painting phase to equipment that is electric-powered Compliance shall be demonstrated through equipment lists, rental records, and weekly logs and shall be summarized in a post-construction compliance memo for the Supplemental Mitigation Monitoring and Reporting Program (Supplemental MMRP) file.                      (CAPCOA Measure C-1-A)</p>	Prior to the issuance of building permits	City of Garden Grove		
<p><b>MM-GHG-2: Construction Office Energy Efficiency.</b> Prior to issuance of building permits, the Applicant or designee shall submit documentation to the City of Garden Grove that temporary construction field office(s) are equipped with energy efficient lighting such as compact fluorescent or LEDs and that heating and cooling units are Energy Star certified.</p>	Prior to the issuance of building permits	City of Garden Grove		
<p><b>MM-GHG-3: Construction Debris Recycling.</b> Prior to the start of construction, the Project’s contractor shall develop a Construction Waste Management Plan (Plan) for submittal and approval to the City</p>	Prior to the start of construction	City of Garden Grove		

**Table 4-1. Supplemental Mitigation Monitoring and Reporting Program**

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
<p>of Garden Grove. The Plan shall recycle or salvage non-hazardous construction debris including but not limited to wood, metal, concrete, asphalt, and other reusable materials generated during construction activities. The contractor shall implement the Plan to achieve a minimum diversion target of 75% of non-hazardous construction and demolition debris from landfills, exceeding the City's current 65% diversion requirement. (CAPCOA Measure S-4)</p>				
<p><b>MM-GHG-4: Electric Vehicle Charging Infrastructure.</b> Prior to issuance of building permits, the Project Applicant or designee shall submit a site plan to the City of Garden Grove for approval noting the location of electric vehicle infrastructure and charging stations. Prior to issuance of the final certificate of occupancy, the Project Applicant or designee shall provide electric vehicle (EV) charging infrastructure within the Project site as required by the applicable California Green Building Standards Code, but that, at a minimum, meets or exceeds 2022 California Green Building Standards Code Tier 2 standards. Tier 2 requires approximately 225 parking spaces to be EV capable, and 75 spaces to be equipped with EV Supply Equipment (EVSE). The Project shall install a minimum of 225 EV capable spaces and 100 EVSE spaces. (CAPCOA Measure T-14)</p>	<p>Prior to the issuance of building permits</p>	<p>City of Garden Grove</p>		
<p><b>MM-GHG-5: Guest Vehicle Trip Reductions.</b> Prior to issuance of building permits, the Project Applicant shall submit a site plan to the City of Garden Grove for approval identifying where pedestrian and bicycle connections to adjacent facilities will be provided and where bicycle parking spaces will be provided. The City shall verify the inclusion of pedestrian and bicycle infrastructure prior to the issuance of the final certificate of occupancy. The Project Applicant or designee shall ensure that, at a minimum, the following trip reduction measures are implemented during Project operations to reduce the number of auto-based trips generated by the Project and to encourage the use of transit, bicycling, and walking.</p>	<p>Prior to the issuance of a building permits</p>	<p>City of Garden Grove</p>		

**Table 4-1. Supplemental Mitigation Monitoring and Reporting Program**

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
<ul style="list-style-type: none"> <li>▪ Improve the walkability and design of the Project by providing pedestrian and bicycling connections within the Project site and to adjacent off-site facilities (i.e., sidewalks, crosswalks, wayfinding signage, etc.).</li> <li>▪ Provide secure on-site bicycle racks to accommodate a minimum of 38 bicycle parking spaces and provide bicycle rentals for hotel guests.</li> <li>▪ Alternative transportation services such bike rentals and transit information shall be seamlessly integrated into the guest experience, making alternative modes of travel easy to understand, access, and use.</li> <li>▪ Hotel management/concierge should provide information that promotes walking, bicycling and public transit options to nearby attractions. This should include real-time transit information provided through dedicated monitors, interactive electronic displays, websites, or mobile applications identifying local bus routes and schedules, as well as wayfinding to the existing transit stops within the Project vicinity.</li> <li>▪ Provide a dedicated shuttle service linking the hotel to nearby shopping and entertainment destinations, prioritizing battery-electric vehicles where route length and charging logistics allow; the program may be operated under a vendor contract with scheduled runs during peak guest activity and on-demand service for special events.</li> <li>▪ Hotel management will make available transit passes for purchase and provide clear wayfinding to public transit and shuttle services.</li> <li>▪ Qualitative assessments (e.g., user satisfaction surveys, walk audits, guest feedback) shall be regularly conducted to evaluate the effectiveness of trip reduction strategies.</li> <li>▪ An annual report summarizing how transportation options are being used, guest perceptions, and planned improvements shall be submitted to the City.</li> </ul>				

**Table 4-1. Supplemental Mitigation Monitoring and Reporting Program**

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
<i>(CAPCOA Measures T-34, T-38, T-43, and T-44)</i>				
<p><b>MM-GHG-6: Limit Large Diesel Trucks During Operation.</b> Prior to issuance of certificate of occupancy, the Project Applicant or designee shall submit a Truck Delivery Management Plan to the City of Garden Grove that documents how truck deliveries will be restricted and monitored. The Project Applicant or designee shall implement a monitoring program to restrict the number of large diesel trucks coming to the site (i.e. for deliveries, trash collection, or other services) to an average of 10 trucks per day or less. This restriction is specifically applicable to trucks classified as medium-heavy duty and heavy-heavy duty with gross vehicle weight (GVW) greater than 19,500 pounds. Annual reports summarizing heavy-duty truck trips shall be provided to the City of Garden Grove. <i>(CAPCOA Measure C-2)</i></p>	<p>Prior to the issuance of a certificate of occupancy</p>	<p>City of Garden Grove</p>		
<p><b>MM-GHG-7: Building Energy Efficiency Measures.</b> Prior to issuance of building permits, the Project Applicant or designee shall submit documentation of building energy efficiency measures to the City of Garden Grove, such that a minimum of 15% above 2022 Title 24 Building Envelope Energy Efficiency Standards is achieved. Energy efficiency measures shall include, at a minimum, the following:</p> <ol style="list-style-type: none"> <li>1. LED Lighting – High-lumen LED light fixtures shall be used exclusively for the lighting of spaces throughout the Project that require 8 to 10 watts per fixture</li> <li>2. Energy efficient lighting shall be incorporated into all on-site lighting and energy efficient appliances shall be incorporated into Project operations.</li> <li>3. HVAC Optimization – The HVAC system shall include the following:               <ol style="list-style-type: none"> <li>a. Electric heat pumps will be used for space heating and domestic hot water, with all systems integrated and monitored by the Project Building Management System for performance optimization, fault detection, and energy tracking.</li> </ol> </li> </ol>	<p>Prior to the issuance of building permits</p>	<p>City of Garden Grove</p>		

**Table 4-1. Supplemental Mitigation Monitoring and Reporting Program**

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
<p>b. Smart thermostats, which include a motion sensor detector and door/window open sensors, will be installed in each guest room.</p> <p>c. The central plant will utilize a Combination Plant with SmartPlate EV</p> <p>4. Glazing – All glazing for the tower and exterior public spaces shall be installed with Low-E glass [U-factor (thermal transmittance) ≤ 0.28 and Solar Heat Gain Coefficient (SHGC) ≤ 0.23.</p> <p>5. Energy Management System – The Project shall use advanced systems to monitor and optimize energy use in real time.</p> <p>6. Benchmarking and Monitoring – The Project shall incorporate an Energy Star Portfolio Management system to track and manage energy consumption</p> <p>7. Third-Party Verification/LEED Certification – The Project shall obtain third-party HVAC commissioning verification or LEED certification of Gold to Platinum to verify energy savings.</p> <p>8. Battery Energy Storage –The Project would include an on-site battery energy storage system occupying approximately 500 to 1,000 square feet, consisting of modular lithium-ion battery cabinets and associated electrical equipment. The system would be used for peak load management and grid resiliency consistent with California Fire Code and Title 24 requirements. <i>(CAPCOA Measure E-1 is quantified) (CAPCOA Measures E-7, E-9, E-22, E-24, and E25 are qualitative)</i></p>				
<p><b>MM-GHG-8: Cool Roof/Deck.</b> Prior to issuance of building permits, the Project Applicant or designee shall submit plans to the City for approval that require cool roof and cool deck surfaces to be included as part of the Project for the podium and tower, consistent with the specifications provided below.</p> <ul style="list-style-type: none"> <li>▪ Cool Roof Installation:</li> </ul> <p>All roofing materials shall meet or exceed the California Title 24, Part 6 requirements for cool roofs, based on roof slope:</p>	<p>Prior to the issuance of building permits</p>	<p>City of Garden Grove</p>		

**Table 4-1. Supplemental Mitigation Monitoring and Reporting Program**

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
<ul style="list-style-type: none"> <li>▪ Low-sloped roofs (<math>\leq</math> 2:12 pitch):                             <ul style="list-style-type: none"> <li>- Aged Solar Reflectance (SR) <math>\geq</math> 0.63</li> <li>- Thermal Emittance (TE) <math>\geq</math> 0.75</li> <li>- Or Solar Reflectance Index (SRI) <math>\geq</math> 75</li> </ul> </li> <li>▪ Steep-sloped roofs (<math>&gt;</math> 2:12 pitch):                             <ul style="list-style-type: none"> <li>- Aged SR <math>\geq</math> 0.20</li> <li>- TE <math>\geq</math> 0.75</li> <li>- Or SRI <math>\geq</math> 16</li> </ul> </li> <li>▪ Cool Deck Surfaces:</li> </ul> <p>All exterior hardscape surfaces exposed to sunlight (e.g., pool decks, patios, walkways) shall use high-albedo materials or cool surface coatings with:</p> <ul style="list-style-type: none"> <li>- Minimum SR of 0.29 or higher</li> <li>- Or materials with a demonstrated surface temperature reduction of at least 10° F compared to conventional concrete or asphalt</li> </ul> <p>To meet the above standards, the Project Applicant may implement one or more of the following:</p> <ul style="list-style-type: none"> <li>▪ Use Energy Star®-rated roofing products or materials listed in the Cool Roof Rating Council (CRRC) directory.</li> <li>▪ Apply reflective coatings or single-ply membranes with compliant SR and TE values.</li> <li>▪ Install light-colored or permeable pavers, cool concrete, or coated surfaces for decks and walkways, such as permeable interlocking concrete pavers, porous asphalt, permeable concrete, geocell systems, or bio-asphalt.</li> <li>▪ Incorporate green roofs or vegetated shading structures as alternative compliance pathways (subject to City approval).</li> </ul> <p>Monitoring and Reporting shall include:</p>				

**Table 4-1. Supplemental Mitigation Monitoring and Reporting Program**

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
<ul style="list-style-type: none"> <li>▪ Submittal of roofing and hardscaping material specifications to the City of Garden Grove Building Division prior to issuance of building permits.</li> <li>▪ City inspectors shall verify installation during final inspection and prior to issuance of the final certificate of occupancy.</li> </ul> <p><i>(CAPCOA Measure E-21)</i></p>				
<p><b>MM-GHG-9: Renewable Energy.</b> The Project Applicant or designee shall install a solar photovoltaic system capable of generating a minimum of 267,000 kilowatt hours (kWh) per year prior to issuance of certificate of occupancy. <i>(CAPCOA Measure E-10-B)</i></p>	Prior to the issuance of a certificate of occupancy	City of Garden Grove		
<p><b>MM-GHG-10: Water Conservation.</b> Prior to receiving the final certificate of occupancy, the Project Applicant or designee shall submit a Water Conservation Compliance Report to the City of Garden Grove for review and approval. The Project shall achieve a minimum 10% reduction in total water use compared to the baseline of 167 gallons per room per day as identified in the Water Supply Assessment (Psomas 2022). This equates to a target of no more than 150.3 GPCD at full occupancy. The Water Conservation Compliance Report shall include product specifications for all water-saving fixtures and systems, landscape and irrigation plans, greywater system design and capacity documentation, post-occupancy water use monitoring plan for the first 12 months after occupancy. To meet or exceed the performance standard, the Project may implement a combination of the following water conservation strategies:</p> <ul style="list-style-type: none"> <li>▪ Low-Flow Water Fixtures for guest rooms and public area</li> <li>▪ Smart Irrigation System – outdoor landscaping shall include weather-based irrigation controllers and drought-resistant landscaping to minimize outdoor water use</li> <li>▪ Greywater Recycling</li> </ul> <p><i>(CAPCOA Measures W-2, W-5, and W-7)</i></p>	Prior to receiving the final certificate of occupancy	City of Garden Grove		

**Table 4-1. Supplemental Mitigation Monitoring and Reporting Program**

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
<p><b>MM-GHG-11: Waste Reduction.</b> Prior to issuance of the final certificate of occupancy, the Project Applicant or designee shall submit a Waste Management, Recycling, and Composting Plan to the City of Garden Grove for review and approval. The program shall be implemented on-site at the Project location and apply to all operational areas, including guest services, food and beverage operations, maintenance, and administrative functions. The waste reduction program shall be fully implemented during Project operations. The Plan shall specify a minimum diversion of 25% of municipal solid waste, including organics, generated on site from landfill disposal. The Waste Management, Recycling, and Composting Plan may include but not be limited to the following:</p> <ul style="list-style-type: none"> <li>▪ Recycling Program                             <ul style="list-style-type: none"> <li>- Provide labeled bins for recyclables and certified hauler contracts.</li> <li>- Promote recycled paper and other products like soap.</li> </ul> </li> <li>▪ Organics and Composting Program                             <ul style="list-style-type: none"> <li>- Collect food scraps and compostables.</li> </ul> </li> <li>▪ Source Reduction Measures                             <ul style="list-style-type: none"> <li>- Reduce single-use items and paper use.</li> <li>- Ban disposable (i.e., designed to be used once and discarded) foodware items and accessories.</li> <li>- Allow customers to bring their own reusable items.</li> <li>- Require hand soap in refillable containers.</li> <li>- Do not provide water in plastic bottles or disposable single-use cups.</li> <li>- Do not use expanded polystyrene (i.e., Styrofoam).</li> <li>- Require reusable napkins and tablecloths with recyclable disposable napkins only for takeout.</li> <li>- Provide hand dryers in areas accessible to customers.</li> <li>- Require reusable laundry bags.</li> <li>- Require reusable dishware for room service.</li> </ul> </li> </ul>	<p>Prior to issuance of the final certificate of occupancy</p>	<p>City of Garden Grove</p>		

**Table 4-1. Supplemental Mitigation Monitoring and Reporting Program**

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
<ul style="list-style-type: none"> <li>- Offer toiletries on request rather than automatically.</li> <li>- Provide key cards made of non-plastic materials, including traditional metal keys or wood, bamboo, and paper options for chip-based cards.</li> <li>- Incentivize returning keys to discourage waste.</li> <li>- Provide non-plastic shower caps, razors, shaving cream, slippers, eye masks, and ear plugs.</li> <li>- Remove minifridge items that use plastic.</li> <li>- Eliminate the use of garbage bags if possible, or use garbage bags made of compostable material.</li> <li>- Serve employee meals with reusable dishware and cutlery and provide reusable water bottles for all employees with accessible water bottle refill stations.</li> <li>- Replace paper towels with reusable dish rags.</li> <li>▪ Employee and Guest Education               <ul style="list-style-type: none"> <li>- Provide staff training and signage for guests.</li> </ul> </li> <li>▪ Monitoring and Reporting               <ul style="list-style-type: none"> <li>- Track waste and submit Annual Waste Diversion Report to the City of Garden Grove.</li> </ul> </li> </ul> <p>In addition, if the hotel/operations qualify as a covered edible food generator, the Project will contract with a food recovery organization/service and keep required records. If not covered, the Project will evaluate a partnership during operator onboarding and implement if feasible.</p> <p><i>(CAPCOA Measure S-1/S-2) (CAPCOA Measure S-3 is a qualitative measure in CalEEMod and is not quantified in the operational analysis)</i></p>				
<p><b>MM-GHG-12: Zero Emission Landscape Equipment.</b> During Project operations, the Project Applicant or designee shall ensure zero-emission landscape equipment (defined as equipment that does not emit tailpipe emissions during operation) is utilized. The Project Applicant or designee shall be responsible for ensuring that all</p>	During operations	City of Garden Grove		

**Table 4-1. Supplemental Mitigation Monitoring and Reporting Program**

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
<p>landscape maintenance contractors and staff comply with this measure. All landscape maintenance activities associated with the Project shall utilize zero-emission landscaping equipment, such as electric-powered or battery-operated tools. This requirement applies to all landscaped areas within the Project site, including but not limited to courtyards, green spaces, perimeter landscaping, and rooftop gardens. The requirement shall be implemented prior to the commencement of landscape maintenance operations. To meet or exceed the performance standard, the Project may implement a combination of the following strategies:</p> <p><b>Electric-Powered Equipment</b></p> <ul style="list-style-type: none"> <li>▪ Use electric or battery-powered:                             <ul style="list-style-type: none"> <li>- Leaf blowers.</li> <li>- Lawn mowers.</li> <li>- Hedge trimmers.</li> <li>- Edgers.</li> <li>- Chainsaws.</li> </ul> </li> </ul> <p><b>Contractor Requirements</b></p> <ul style="list-style-type: none"> <li>▪ Include zero-emission equipment requirements in all landscape maintenance contracts.</li> <li>▪ Require contractors to provide documentation of equipment type and compliance.</li> </ul> <p><b>On-Site Charging Infrastructure</b></p> <ul style="list-style-type: none"> <li>▪ Install dedicated charging stations or outlets for landscape equipment.</li> </ul> <p><b>Equipment Inventory and Tracking</b></p> <ul style="list-style-type: none"> <li>▪ Maintain an inventory of all landscape equipment used on site.</li> <li>▪ Submit an annual compliance report to the City of Garden Grove verifying that only zero-emission equipment is in use.</li> </ul> <p><b>Training and Education</b></p> <ul style="list-style-type: none"> <li>▪ Provide training to landscape maintenance staff on the proper use and maintenance of electric equipment.</li> </ul>				

**Table 4-1. Supplemental Mitigation Monitoring and Reporting Program**

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
<ul style="list-style-type: none"> <li>▪ Display signage or include information in sustainability reports to promote awareness. (CAPCOA Measure LL-1)</li> </ul>				
<p><b>MM-GHG-13: Prohibit Woodburning Devices, Natural Gas Fireplaces, and Fire Pits.</b> Prior to the issuance of building permits, the Project Applicant or designee shall submit building design plans for approval of the City showing the prohibition of on-site woodburning devices, natural gas fireplaces, fire pits, or other decorative combustion features throughout the Project site. Prior to the issuance of the final certificate of occupancy, the City shall confirm that this prohibition has been implemented.</p>	Prior to the issuance of building permits	City of Garden Grove		
<p><b>MM-GHG-14: Refrigerant Management Program.</b> Prior to issuance of mechanical permits, the Project Applicant or designee shall develop and submit a Refrigerant Management Program to the City of Garden for review and approval. The Project Applicant or designee shall be responsible for developing, implementing, and maintaining the refrigerant management program in coordination with HVAC contractors and facility operations staff. The Refrigerant Management Program shall include the use of low-GWP refrigerants (e.g., R-32 or better) and incorporate best management practices to reduce emissions from service, operation, and disposal of refrigerants. This measure shall apply to all refrigeration and HVAC systems installed and operated within the Project site, including guest rooms, common areas, kitchens, and mechanical rooms. The Project shall ensure that:</p> <ul style="list-style-type: none"> <li>▪ 100% of installed HVAC and refrigeration systems use refrigerants with a GWP <math>\leq</math> 750, consistent with California Air Resources Board (CARB) regulations.</li> <li>▪ The refrigerant management program shall achieve a minimum 10% reduction in potential refrigerant emissions compared to standard industry practices, as demonstrated through leak rate tracking and maintenance logs.</li> </ul>	Prior to the issuance of mechanical permits	City of Garden Grove		

**Table 4-1. Supplemental Mitigation Monitoring and Reporting Program**

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
<p>To meet or exceed the performance standard, the Project may implement a combination of the following strategies:</p> <p><b>Mechanical Equipment</b></p> <ul style="list-style-type: none"> <li>Install microchannel heat exchangers in A/C equipment in place of conventional heat exchangers.</li> </ul> <p><b>Use of Low-GWP Refrigerants</b></p> <ul style="list-style-type: none"> <li>Select refrigerants such as R-32, R-454B, or other CARB-compliant alternatives with <math>GWP \leq 750</math>.</li> <li>Avoid high-GWP refrigerants such as R-410A and R-404A.</li> </ul> <p><b>Leak Detection and Prevention</b></p> <ul style="list-style-type: none"> <li>Install automatic leak detection systems for large-capacity systems.</li> <li>Conduct quarterly inspections and maintain leak logs.</li> </ul> <p><b>Refrigerant Recovery and Disposal</b></p> <ul style="list-style-type: none"> <li>Use certified technicians for refrigerant recovery and disposal.</li> <li>Maintain documentation of recovered and recycled refrigerants.</li> </ul> <p><b>Preventive Maintenance Program</b></p> <ul style="list-style-type: none"> <li>Implement a scheduled maintenance plan to inspect and service HVAC and refrigeration systems.</li> <li>Include refrigerant charge optimization and system performance checks.</li> </ul> <p><b>Training and Certification</b></p> <ul style="list-style-type: none"> <li>Ensure all HVAC technicians are EPA Section 608 certified.</li> <li>Provide training on low-GWP refrigerant handling and leak prevention.</li> </ul> <p><b>Third-Party Verification</b></p> <ul style="list-style-type: none"> <li>Obtain third-party verification of refrigerant management practices through programs such as GreenChill or LEED Enhanced Refrigerant Management credit.</li> </ul> <p>Prior to issuance of certificate of occupancy, the City of Garden Grove will verify that the equipment specified in the Refrigerant</p>				

**Table 4-1. Supplemental Mitigation Monitoring and Reporting Program**

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
<p>Management Program has been installed. Ongoing compliance shall be performed by the Project Applicant or their designee. (CAPCOA Measures R-1, R-4, R-5, R-6, and R-7)</p>				
<p><b>MM-GHG-15: Carbon Offsets</b> – The Project Applicant (or its designee) shall implement the following carbon offsets in accordance with the Project’s construction and operational phases as outlined below.</p> <p><i>Timeline for Acquisition of Carbon Offset Credits</i></p> <p><b>Construction</b></p> <p>Prior to issuance of grading permits, the Project Applicant (or its designee) shall purchase and retire carbon offsets in a quantity sufficient to offset all construction GHG emissions in a lump sum with the quantification, performance standards, and requirements set forth below. Alternatively, construction offsets may be purchased on an annual basis by purchasing the first phase of construction offsets prior to start of grading and then purchasing offsets for each following year by December 31 of the year preceding the new year in which construction will occur. Annual construction GHG emission offsets shall also be subject to the same quantification, performance standards, and requirements set forth below.</p> <p><b>Operation</b></p> <p>Prior to issuance of the final certificate of occupancy, the Project Applicant or its designee shall purchase and retire carbon offsets in a quantity sufficient to offset, for a 30-year period following occupancy of the Project, the construction and operational GHG emissions from the Project to the 1,400 MT CO<sub>2</sub>e per year threshold, consistent with the quantification, performance standards and requirements set forth below. Alternatively, the Project Applicant or its designee may purchase and retire annual operational GHG offsets for a period of 30 years by December 31 of the year preceding each new year after the issuance of the final certificate of occupancy. Annual operational GHG</p>				

**Table 4-1. Supplemental Mitigation Monitoring and Reporting Program**

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion																		
<p>emission offsets shall also be subject to the same quantification, performance standards, and requirements set forth below.</p> <p><b>Quantification of GHG Emissions and Reductions Required</b></p> <p><b>Construction</b></p> <p>The estimated total construction GHG emissions to be offset are 3,362.30 MT CO<sub>2</sub>e if purchased in a lump sum. If purchased on an annual basis, the following schedule provides the estimated annual emissions and date of compliance.</p> <table border="1" data-bbox="157 695 980 997"> <thead> <tr> <th>Year</th> <th>Offsets Required (MT CO<sub>2</sub>e)</th> <th>Purchase and Retirement Deadline</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>402.52</td> <td>Prior to issuance of grading permits</td> </tr> <tr> <td>2</td> <td>1,434.02</td> <td>December 31 of Year 1</td> </tr> <tr> <td>3</td> <td>1,410.81</td> <td>December 31 of Year 2</td> </tr> <tr> <td>4</td> <td>114.95</td> <td>December 31 of Year 3</td> </tr> <tr> <td><b>Total</b></td> <td><b>3,362.30</b></td> <td></td> </tr> </tbody> </table> <p><b>Notes:</b> MT CO<sub>2</sub>e = metric tons of carbon dioxide equivalent; N/A = not applicable.</p> <p><b>Operation</b></p> <p>The estimated operational emissions are 7,408.02 MT CO<sub>2</sub>e. To mitigate operational emissions below the 1,400 MT CO<sub>2</sub>e per year threshold, the Project would purchase and retire one lump sum of 180,270.60 MT CO<sub>2</sub>e of offsets (7,408.02 MT CO<sub>2</sub>e – 6,009.02 [offsets] = 1,399 MT CO<sub>2</sub>e remaining); 6,009.02 MT CO<sub>2</sub>e × 30-year life = 180,270.60 MT CO<sub>2</sub>e; or that same total amount of credits in increments over the 30 years. The following schedule provides the estimated offset emissions and dates of compliance under the scenarios where credits are purchased and retired in a lump sum or on an annual basis.</p>	Year	Offsets Required (MT CO <sub>2</sub> e)	Purchase and Retirement Deadline	1	402.52	Prior to issuance of grading permits	2	1,434.02	December 31 of Year 1	3	1,410.81	December 31 of Year 2	4	114.95	December 31 of Year 3	<b>Total</b>	<b>3,362.30</b>					
Year	Offsets Required (MT CO <sub>2</sub> e)	Purchase and Retirement Deadline																				
1	402.52	Prior to issuance of grading permits																				
2	1,434.02	December 31 of Year 1																				
3	1,410.81	December 31 of Year 2																				
4	114.95	December 31 of Year 3																				
<b>Total</b>	<b>3,362.30</b>																					

Scenario	Offsets Required (MT CO <sub>2e</sub> )	Purchase and Retirement Deadline				
Lump sum	180,270.60	Prior to issuance of certificate of occupancy				
Annual basis 30-year term	6,009.02	Prior to issuance of certificate of occupancy for Year 1 and December 31 of preceding year				

**Notes:** MT CO<sub>2e</sub> = metric tons of carbon dioxide equivalent; N/A = not applicable.

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

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

“Carbon offset” shall mean an instrument, credit or other certification verifying the reduction of GHG emissions issued by the following CARB-accredited registries: Climate Action Reserve, the American Carbon Registry, or Verra (formerly, the Verified Carbon Standard); as well as credits issued for projects listed on the California Carbon Sequestration and Climate Resiliency Project Registry, which is maintained by the California Natural Resources Agency and may provide additional offsets. This shall include, but is not limited to, an instrument, credit or other certification issued by these registries for GHG reduction activities. The Project shall neither purchase offsets from the Clean Development Mechanism registry nor purchase offsets generated under Clean Development Mechanism protocols.

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

1. Adherence to established GHG accounting principles set forth in the International Organization for Standardization (ISO) 14064,

**Table 4-1. Supplemental Mitigation Monitoring and Reporting Program**

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
<p>Part 2 or the World Resources Institute/World Business Council for Sustainable Development (WRI/WBCSD) Greenhouse Gas Protocol for Project Accounting; and</p> <p>2. Oversight of the implementation of protocols and methodologies that define the eligibility of carbon offset projects and set forth standards for the estimation, monitoring and verification of GHG reductions achieved from such projects. The protocols and methodologies shall:</p> <ul style="list-style-type: none"> <li>a. Be developed by the registries through a transparent public and expert stakeholder review process that affords an opportunity for comment and is informed by science;</li> <li>b. Incorporate standardized offset crediting parameters that define whether and how much emissions reduction credit a carbon offset project should receive, having identified conservative project baselines and the length of the crediting period and considered potential leakage and quantification uncertainties;</li> <li>c. Establish data collection and monitoring procedures, mechanisms to ensure permanency in reductions, and additionality and geographic boundary provisions; and</li> <li>d. Adhere to the principles set forth in the program manuals of each of the aforementioned registries, as such manuals are updated from time to time. The current registry documentation includes the Climate Action Reserve’s <i>Reserve Offset Program Manual</i><sup>1</sup> (April 2024) and <i>Climate Forward Program Manual</i><sup>2</sup> (December 2021); the American Carbon Registry’s <i>The ACR Standard, Requirements and Specifications for the Quantification, Monitoring, Reporting, Verification, and Registration of Project-Based GHG Emissions Reductions and</i></li> </ul>				

<sup>1</sup> <https://climateactionreserve.org/wp-content/uploads/2024/04/Reserve-Program-Manual-v9.2.pdf>.

<sup>2</sup> [https://climateforward.org/wp-content/uploads/2021/12/Climate-Forward-Program-Manual-December-2021\\_12-FINAL.pdf](https://climateforward.org/wp-content/uploads/2021/12/Climate-Forward-Program-Manual-December-2021_12-FINAL.pdf).

**Table 4-1. Supplemental Mitigation Monitoring and Reporting Program**

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
<p><i>Removals</i><sup>3</sup> (July 2023); and Verra’s VCS Standard, <i>Program Guide</i><sup>4</sup> (August 2023), and <i>Methodology Requirements</i><sup>5</sup> (October 2023).</p> <p>The City has reviewed the registries’ methodologies and has determined that protocols established pursuant to such methodologies – including updates to those protocols and methodologies as may occur from time to time by the registries in accordance with the registry documentation listed in the prior paragraph to ensure the continuing efficacy of the reduction activities – are eligible for use under this mitigation measure.</p> <p>The carbon offsets purchased to satisfy this measure must represent the reduction or sequestration of one MT CO<sub>2</sub>e that is “not otherwise required” (CEQA Guidelines Section 15126.4[c][3]). The carbon offsets must achieve the standard of additional, real, permanent, quantifiable, verifiable, and enforceable reductions, which are defined for purposes of this mitigation measure as follows consistent with the applicable provisions in the California Code of Regulations, Title 17:</p> <ol style="list-style-type: none"> <li>1. “Additional” means that the carbon offset is not otherwise required by law or regulation, and not any other GHG emissions reduction that otherwise would occur.</li> <li>2. “Real” means that the GHG reduction underlying the carbon offset results from a demonstrable action or set of actions, and is quantified under the protocol or methodology using appropriate, accurate, and conservative methodologies that account for all GHG emissions sources and sinks within the boundary of the applicable carbon offset project, uncertainty, and the potential for activity-shifting leakage and market-shifting leakage.</li> </ol>				

<sup>3</sup> <https://acrcarbon.org/wp-content/uploads/2023/10/ACR-Standard-v8.0.pdf>.

<sup>4</sup> <https://verra.org/documents/vcs-program-guide-v4-4/>.

<sup>5</sup> <https://verra.org/documents/vcs-methodology-requirements-v4-4/>.

**Table 4-1. Supplemental Mitigation Monitoring and Reporting Program**

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
<p>3. “Verifiable” means that the GHG reduction underlying the carbon offset is well documented, transparent, and set forth in a document prepared by an independent verification body that is accredited through the American National Standards Institute (ANSI).</p> <p>4. “Permanent” means that the GHG reduction underlying the carbon offset is not reversible; or, when GHG reduction may be reversible, that a mechanism is in place to replace any reversed GHG emission reduction.</p> <p>5. “Quantifiable” means the ability to accurately measure and calculate the GHG reduction relative to a project baseline in a reliable and replicable manner for all GHG emission sources and sinks included within the boundary of the carbon offset project, while accounting for uncertainty and leakage.</p> <p>6. “Enforceable” means that the implementation of the GHG reduction activity must represent the legally binding commitment of the offset project developer to undertake and carry it out.</p> <p>The City has reviewed and determined that methodologies and protocols established by American Climate Registry, Climate Action Reserve, and Verra establish and require carbon offset projects to comply with standards designed to achieve additional, real, permanent, quantifiable, verifiable, and enforceable reductions. Additionally, the “Reporting and Enforcement Standards” below shall ensure that the requirements of this mitigation measure will be enforced, as the City has authority to hold the Applicant accountable and to take appropriate corrective action if it determines that any carbon offsets do not comply with the requirements herein.</p> <p>Carbon offsets secured from the CARB-accredited registries shall be prioritized in accordance with the following criteria: (1) offsets within the City; (2) offsets within the County, only if in-City offsets are unavailable; (3) offsets within the State of California, only if in-county</p>				

**Table 4-1. Supplemental Mitigation Monitoring and Reporting Program**

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
<p>offsets are unavailable; (3) offsets within the United States, only if in-state offsets are unavailable.<sup>6</sup></p> <p>The above definitions are provided as criteria and performance standards associated with the use of carbon offsets. Such criteria and performance standards are intended only to further construe the standards under CEQA for mitigation related to GHG emissions (see, e.g., State CEQA Guidelines Section 15126.4[a], [c]), and are not intended to apply or incorporate the requirements of any other statutory or regulatory scheme not applicable to the Project (e.g., the Cap-and-Trade Program).</p> <p><b>Monitoring, Reporting, and Enforcement Standards</b></p> <p>Prior to the timeline identified in the initial section of this mitigation measure, the Project Applicant or its designee shall submit documentation in the form of a report to the City that identifies the quantity of emission reductions required by this mitigation measure, as well as the carbon offset proposed for acquisition to achieve compliance with this measure. For purposes of demonstrating that each offset is additional, real, permanent, quantifiable, verifiable and enforceable, the reports shall include: (i) the applicable protocol(s) and methodologies associated with the carbon offsets, (ii) the third-party verification report(s) and statement(s) affiliated with the carbon offset projects, (iii) the unique serial numbers assigned by the registry(ies) to the carbon offset, which serves as evidence that the registry has determined the carbon offset project to have been implemented in accordance with the applicable protocol or methodology and ensures that the offsets cannot be further used in any manner, and (iv) the carbon offset meets the locational attributes</p>				

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

**Table 4-1. Supplemental Mitigation Monitoring and Reporting Program**

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
<p>as specified by this mitigation measure and verified through a market survey report prepared by a carbon offset broker that identifies the carbon registry listings reviewed for carbon offset availability, including the related date of inquiry.</p> <p>The Project Applicant (or its designee) shall select and retain at least one independent, third-party expert on GHG mitigation and offsets to review the documentation provided by the Applicant (or its designee) relating to, among other data, construction- and operation-related emissions, and provide a report with analysis and recommendations to the City (with supporting materials), on whether the Project has complied with the off-site GHG emissions reduction measures set forth in this mitigation measure. The Project Applicant's (or its designee's) selection of each expert, who shall not be a current or former employee or agent of the Project Applicant (or its designee), shall be subject to the approval of the City Attorney, which shall not be unreasonably withheld. The Project Applicant (or its designee) shall retain the expert(s) for all offset credit submissions made to the City until all offsets required this mitigation measure are acquired and accepted by the City.</p> <p>If the City determines that the Project's carbon offsets at issue in the Project Applicant's (or their designee's) submission meet the requirements of this mitigation measure, the offsets required to be acquired by the Project will be proportionally reduced. Upon an affirmative finding from the City that the Project's carbon offsets are eligible for use under this measure, and within the applicable timeframe required by the first section of this mitigation measure, the Project Applicant (or their designee) shall provide to the City copies of the relevant portions of the GHG offset contracts demonstrating the applicable carbon offsets have been acquired. This will serve as the final documentation required to demonstrate compliance with this mitigation measure.</p>				

**Table 4-1. Supplemental Mitigation Monitoring and Reporting Program**

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
<p>If the City determines that the Project’s carbon offsets do not meet the requirements of this mitigation measure, the City shall provide a detailed explanation of the basis for the City’s determination. Carbon offsets not approved by the City as meeting the requirements of this mitigation measure cannot be used to reduce Project GHG emissions and the Applicant will be required to submit qualifying carbon offsets accepted by the City prior to the applicable timeframe specified in the first section of this mitigation measure.</p> <p><i>(CAPCOA Measure M-2)</i></p>				
<b>Project Design Features</b>				
<b>PDF-4:</b> Construction equipment should be maintained in proper tune.	During construction	City of Garden Grove		
<b>PDF-5:</b> All construction vehicles should be prohibited from excessive idling. Excessive idling is defined as 5 minutes or longer.	During construction	City of Garden Grove		
<b>PDF-8:</b> For construction activities other than those addressed by MM-GHG-1 and MM-GHG-2, establish an electricity supply to the construction site and use electric powered equipment instead of diesel-powered equipment or generators, where feasible.	During construction	City of Garden Grove		
<b>PDF-10:</b> Use haul trucks with on-road engines instead of off-road engines for on-site hauling.	During construction	City of Garden Grove		
<b>PDF-11:</b> The Project will comply with the mandatory requirements of the latest California Building Standards Code, Title 24, Part 6 (Energy Code) and Part 11 (California Green Building Standards Code [CALGreen]), including the provisions for bicycle parking, electric vehicle charging stations, energy efficiency, material conservation, and water/waste reduction.	During operations.	City of Garden Grove		
<b>PDF-12:</b> Install signage at loading docks requiring trucks to limit engine idling times to 5 minutes or less.	During operations	City of Garden Grove		
<b>PDF-21:</b> Engine idling time for all delivery vehicles and trucks must be limited to 5 minutes or less. Signage should be posted in the designated loading areas reflecting the idling restrictions.	During operations	City of Garden Grove		

**Table 4-1. Supplemental Mitigation Monitoring and Reporting Program**

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
<p><b>PDF-27: Sustainable Building Materials and Contracting.</b> The Project will prioritize low-impact, sustainably sourced, and recyclable materials across construction and interior finishes, including low-VOC paints, Forest Stewardship Council-certified wood, and recycled-content flooring. The Project is also implementing vendor standards that require environmental product declarations and third-party certifications to verify material sustainability. Materials shall be selected not only for their initial environmental footprint but also for durability and long-term performance, reducing the need for frequent replacement and associated waste.</p> <p>In addition, the Project Applicant or their designee will include bid language requiring the contractor to prioritize sourcing within the region (e.g., Orange County/Southern California) where pricing and availability are competitive, and to document major material and subcontractor origins in the construction closeout package.</p>	During construction	City of Garden Grove		
<p><b>PDF-28:</b> The Project amenities shall be available to registered hotel guests only. There will be no day passes allowed.</p>	Prior to project opening	City of Garden Grove		
<p><b>PDF-29:</b> The Project amenities include a self-service bicycle repair station adjacent to the guest and employee bicycle parking spaces.</p>	During project construction for installation and during project operation for maintenance and provision of bicycle repair.	City of Garden Grove		
<b>Transportation</b>				
<b>Mitigation Measures</b>				
<p><b>MM-TRA-1: Implement Commute Trip Reduction Marketing:</b> The Project Applicant shall implement a marketing strategy to promote the Project site employer’s Commute Trip Reduction (CTR) program. Information sharing and marketing promote and educate employees about their travel choices to the employment location beyond driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT and GHG emissions.</p>	Prior to project opening.	City of Garden Grove		

**Table 4-1. Supplemental Mitigation Monitoring and Reporting Program**

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
<p>However, to ensure that CTR achieves VMT reduction of at least 4%, the following measures will be incorporated:</p> <ul style="list-style-type: none"> <li>a) The Applicant shall provide on site or online commuter information services to employees. The Applicant shall also distribute a quarterly newsletter with tips, success stories, and updates to ensure education and encouragement for the CTR program.</li> <li>b) The CTR shall require the Project Applicant or their designee to appoint a Commute Program Coordinator to oversee the implementation and management of the marketing strategy.</li> <li>c) The Applicant shall ensure on-site or online subsidized transit pass sales are available to all employees.</li> <li>d) The Applicant shall provide guaranteed ride home service by matching employees with other employees or providing access to platforms such as Rideharing.com and Lyft that connect riders for daily commutes with nearby drivers.</li> <li>e) A minimum of 10 preferential parking spaces for carpools/vanpools shall be provided. (CAPCOA Measures T-7, T-9-B)</li> </ul>				
<p><b>MM-TRA-2: Provide End-of-Trip Bicycle Facilities:</b> The Project shall install and maintain end-of-trip bicycle facilities for employee use. End-of-trip facilities include bike parking, bike lockers, showers, and personal lockers. The provision and maintenance of secure bike parking and related facilities encourages commuting by bicycle, thereby reducing VMT and GHG emissions. The Project design includes on-site bicycle racks to accommodate a minimum of 38 short-term bicycle parking spaces and provide bicycle rentals for hotel guests on the ground level and 32 secure long-term bicycle parking spaces for employees; additionally, locker and shower facilities will be provided for employees. (CAPCOA Measure T-10)</p>	<p>During project construction for installation and during project operation for maintenance and provision of bicycle rentals.</p>	<p>City of Garden Grove</p>		

**Table 4-1. Supplemental Mitigation Monitoring and Reporting Program**

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
<b>Project Design Features</b>				
None.	N/A	N/A	N/A	N/A

**Notes:** LEED = Leadership in Energy and Environmental Design; GPCD = gallons per capita per day; GWP = global warming potential; EPA = U.S. Environmental Protection Agency; GHG = greenhouse gas; MT CO<sub>2e</sub> = metric tons of carbon dioxide equivalent; VOC = volatile organic compound; N/A = not applicable.

INTENTIONALLY LEFT BLANK

---

# 5 General Responses to Post-Public Review Comment Letters Received

A large number of comment letters were received after the Public Review period for the Draft Supplemental Environmental Impact Report (SEIR) for the B-2 Site Hotel Project (Project) closed on November 6, 2025.

The California Environmental Quality Act (CEQA) does not require the City of Garden Grove (City) to respond to these letters or include any suggested changes to the Draft SEIR in this Final SEIR. However, in the interest of transparency and full disclosure, general responses to the issues raised in these letters are included in this chapter for informational purposes only.

These letters followed three general formats; therefore, three representative letters were chosen to be included in this chapter for reference, as specified in Table 5-1.

**Table 5-1. Representative Comment Letters Received After Close of the Public Review Period**

Comment Letter Designation	Commenter	Date Received
1	Marina Joel	January 8, 2026
2	Israel Espinoza	January 8, 2026
3	Kassidy Nguyen	January 8, 2026

INTENTIONALLY LEFT BLANK

**From:** [Marina Joel](#)  
**To:** [cityclerk@ggcity.org](mailto:cityclerk@ggcity.org)  
**Subject:** Use Public Land for Housing, Not Another Hotel (Nickelodeon Resort Project)  
**Date:** Thursday, January 8, 2026 8:54:53 AM

---

Honorable Mayor Klopfenstein and City Council Members ,

I understand that at the corner of Harbor Boulevard and Twintree Avenue, the City is considering approving a 500-room, 23-story resort hotel on a 3.72-acre publicly owned site that is already zoned for mixed-use development.

This project would add yet another hotel to an area of our City that already contains over 2,700 hotel rooms across nine hotels within one mile. Meanwhile, Garden Grove continues to struggle with a lack of housing, especially affordable housing for working families.

Public land is a limited resource, and how it is used matters. Approving another large hotel without incorporating housing misses a critical opportunity to address our city's most pressing needs.

As a Garden Grove resident, I urge the City to carefully reconsider this proposal and prioritize housing on public land to better serve our community now and in the future. Thank you.

Marina Joel  
merinajoel@gmail.com  
11692 dale st  
Garden grove, California 92841

INTENTIONALLY LEFT BLANK

## **Response to Post-Public Review Comment Letter 1**

**Marina Joel**  
**January 8, 2026**

The commenter would like to see housing on public land and not another hotel. The comment states that because public land is a limited resource, it matters how it is used.

The Project site is in an area of the City designated as International West Mixed Use (Focus Area A) along Harbor Boulevard, generally between Chapman Avenue on the north and the Garden Grove Freeway (State Route 22) on the south. According to the Garden Grove General Plan (2008), this area:

Holds critical importance for the City for revitalization and economic stimulus purposes. Ideally situated south of the Disneyland Resort district, this area has opportunities to capitalize and expand tourist-based and entertainment-related uses. Full-service hotels and new restaurants have been constructed, predominately at the intersection of Chapman Avenue and Harbor Boulevard. An Economic Impact and Master Plan for the International West Resort Area was prepared to identify strategies to complement established entertainment, hospitality, and sports venues in the surrounding areas by planning for three entertainment centers connected by themed commercial services and retail uses, entertainment venues, hotels, theaters, and parks.

The International West Mixed Use designation allows for a mix of uses, including commercial, entertainment, hotel, and residential uses, and this particular 3.72-acre site is very well situated, with frontage along Harbor Boulevard, for themed entertainment uses within easy driving distance of Disneyland Resort and close to existing tourism-based uses in the City. It is a prime location for a themed hotel, which is consistent with the long-term vision of the City to develop this property with a resort/entertainment/tourism use, as envisioned in the General Plan.

The City has prepared a state-compliant housing element (the 2021–2029 Housing Element, which was adopted on October 10, 2023), which includes a detailed housing site inventory identifying thousands of parcels that could be developed for affordable housing throughout the City. The City specifically has identified more than 2,400 underutilized properties that are not meeting their full economic potential and could be developed for affordable housing. This property is not required to be used for affordable housing and it is not identified as a site for affordable housing in the Housing Element’s site inventory. As such, by building the hotel, it is not reducing or removing properties that have previously been identified for future housing growth in the Housing Element. The sites that have been identified are sufficient to meet the City’s Regional Housing Needs Assessment (RHNA). The project would not minimize the City’s ability to meet its RHNA.

INTENTIONALLY LEFT BLANK

**From:** [Israel Espinoza](#)  
**To:** [cityclerk@ggcity.org](mailto:cityclerk@ggcity.org)  
**Subject:** Housing, Not Hotels on Public Land (Nickelodeon Resort Project)  
**Date:** Thursday, January 8, 2026 6:37:43 AM

---

Honorable Mayor Klopfenstein and City Council Members ,

Garden Grove's working families need more housing options, not more luxury hotel rooms. Despite this, the City is considering the Site B-2 Hotel Project, a 500-room, full-service resort hotel with a water park, lazy river, and a five-level parking garage, on public land at Harbor Boulevard and Twintree Avenue.

Using public land for a large hotel project without including any housing is concerning, particularly during the ongoing housing crisis. This site presents an opportunity to build housing near jobs and services, which would support workers, reduce commute times, and promote long-term economic stability.

Incorporating housing into this project, especially affordable housing, would better serve Garden Grove residents and align public land use with community needs.

I respectfully urge the City to amend this project to include housing and ensure that public land is used to benefit the people who live and work here.

LETS NOT DO THIS TO OUR CITY

Israel Espinoza  
espinoza.israel97@gmail.com  
12531 Janet LN  
Garden grove , California 92840

INTENTIONALLY LEFT BLANK

## Response to Post-Public Review Comment Letter 2

Israel Espinoza  
January 8, 2026

The commenter would like the Project to incorporate housing, especially affordable housing. The City has prepared a state-compliant housing element (the 2021–2029 Housing Element, which was adopted on October 10, 2023), which includes a detailed housing site inventory identifying thousands of parcels that could be developed for housing throughout the City. The City has specifically identified more than 2,400 underutilized properties that are not meeting their full economic potential and could be developed for housing. This property is not identified as a site for housing in the Housing Element’s site inventory. Rather, it has long been designated for resort and entertainment uses, consistent with the City’s long-term vision for the International West Mixed Use corridor.

As a matter of public policy, the City has identified this property for entertainment/resort/tourism uses. The Project site is in an area of the City designated as International West Mixed Use (Focus Area A) along Harbor Boulevard, generally between Chapman Avenue on the north and the Garden Grove Freeway (State Route 22) on the south. According to the Garden Grove General Plan (City of Garden Grove 2008), this area:

Holds critical importance for the City for revitalization and economic stimulus purposes. Ideally situated south of the Disneyland Resort district, this area has opportunities to capitalize and expand tourist-based and entertainment-related uses. Full-service hotels and new restaurants have been constructed, predominately at the intersection of Chapman Avenue and Harbor Boulevard. An Economic Impact and Master Plan for the International West Resort Area was prepared to identify strategies to complement established entertainment, hospitality, and sports venues in the surrounding areas by planning for three entertainment centers connected by themed commercial services and retail uses, entertainment venues, hotels, theaters, and parks.

As the Draft SEIR reflects, the Project site’s 3.72-acre property is well situated for the Project’s proposed resort hotel use, with frontage along Harbor Boulevard for themed entertainment uses within easy driving distance of Disneyland Resort and within easy proximity of existing tourism based uses in the City (Draft SEIR, Section 3.3, Project Objectives, p. 3-3). The Project site is a prime location for a themed hotel, which is consistent with the long-term vision of the City.

As the Draft SEIR analyzed and disclosed, both an exclusively residential and a mixed-use housing alternative are addressed in the “Alternatives Considered but Rejected” section (Draft SEIR, Section 6.3.4, Residential Alternative, p. 6-4, and Section 6.3.6, Mixed-Use Development Alternative, pp. 6-5 and 6-6). The SEIR demonstrates that neither of those options were feasible or capable of meeting the Project’s objectives, nor would the options clearly reduce potentially significant VMT or GHG impacts associated with the Project. The Project site is 3.72 acres in size and would be entirely consumed by a 500-room hotel, themed pool deck, parking garage, and amenities. There is no land available for housing on the Project site without fundamentally reducing the hotel’s size. A reduced hotel size alternative was considered and rejected in the Draft SEIR because it would not meet most of the Project’s basic objectives. A mixed-use alternative that reduces the size of the hotel to accommodate housing would not attain the primary objective of a fully programmed destination resort hotel.

INTENTIONALLY LEFT BLANK

**From:** [Kassidy Nguyen](#)  
**To:** [cityclerk@ggcity.org](mailto:cityclerk@ggcity.org)  
**Subject:** Insufficient Environmental Mitigation at Nickelodeon Project  
**Date:** Thursday, January 8, 2026 2:17:03 AM

---

Honorable Mayor Klopfenstein and City Council Members ,

The City of Garden Grove is considering a proposal to build a 500-room hotel, referred to as the Site B-2 Hotel Project, on public land. This project will involve creating a full-service high-rise resort hotel, complete with a water park, lazy river, and other amenities, on the corner of Harbor Boulevard and Twintree Avenue. Additionally, plans include a five-level parking garage with 528 spaces. The construction is expected to take approximately 30 months and will be completed in a single phase.

We are concerned that the project's environmental mitigation for greenhouse gas (GHG) emissions and vehicle miles traveled (VMT) may be inadequate. The SEIR does not adequately analyze the various components of the project that could generate VMT and mobile emissions independently of the hotel use. In addition, the GHG and VMT analyses appear to assume that only overnight guests and employees will travel to the site, without accounting for non-overnight visitors, such as day guests (like those that visit the Great Wolf Lodge or Disneyland for the day). The SEIR also states that the project will generate 446 operational employees, which may be an overestimate, and may therefore overstate the project's transportation efficiency. Given these issues, the SEIR may understate the project's actual GHG and VMT impacts and, as a result, the level of mitigation required.

Moreover, the project does not adequately consider more effective climate strategies. To help reduce the project's carbon footprint, the project could incorporate mixed-use development, not only building the hotel but also including residential apartments near public transit. A residential component would balance jobs and housing, reducing the number of long-distance car commutes to the hotel.

Kassidy Nguyen  
[kassidynguyen777@gmail.com](mailto:kassidynguyen777@gmail.com)  
12232 Park Ln  
Garden Grove, California 92840

INTENTIONALLY LEFT BLANK

## Response to Post-Public Review Comment Letter 3

Kassidy Nguyen  
January 8, 2026

The commenter believes that the Draft SEIR includes inadequate environmental mitigation for greenhouse gas (GHG) emissions and vehicle miles traveled (VMT) and states that the Draft SEIR does not analyze various components of the proposed hotel that could generate VMT and mobile emissions independently of the hotel use.

The Project was modeled as a single “hotel” land use because all components (e.g., fitness room, theater, swimming pool, restaurant) are ancillary to the hotel use and are limited to registered hotel guests, pursuant to PDFs incorporated into the Supplemental Mitigation Monitoring and Reporting Program (MMRP). Day passes are prohibited. Therefore, it would not be appropriate to estimate trips and VMT from day guests. This is consistent with the Institute of Transportation Engineers (ITE) Trip Generation Manual for Land Use 310, which describes a hotel as “a place of lodging that provides sleeping accommodations and supporting facilities such as full-service restaurant, cocktail lounge, meeting rooms, banquet rooms, and convention facilities. A hotel typically provides a swimming pool or another recreational facility, such as a fitness room” (ITE 2025). This approach aligns with California Emissions Estimator Model (CalEEMod) guidance for mixed-use projects where ancillary facilities do not function as independent destinations. The proposed Project is a unified development under a single entitlement and would operate as an integrated resort hotel. Ancillary amenities are not independent land uses—they are accessory to the primary hotel use and would be available exclusively to registered hotel guests. Accordingly, the CalEEMod modeling reflects the Project’s operational characteristics as a single hotel land use type.

The commenter states that the Draft SEIR’s analysis does not include day visitors or guests. It cites Great Wolf Lodge and Disneyland Resort as comparable examples, where access to the facility is not limited to just registered guests. As explained in Chapter 2, Responses to Comments O2-6 to O2-10, access to all on-site amenities—including the theater, restaurant, and themed pool—is restricted to registered hotel guests pursuant to the PDFs incorporated into the Supplemental MMRP (see Chapter 4, Supplemental Mitigation Monitoring and Reporting Program, of this Final SEIR). Therefore, it would not be appropriate to estimate trips and VMT from day guests because the Project is unlike Disneyland Resort and Great Wolf Lodge in that respect.

The comment states the Draft SEIR’s employee estimate of 446 employees may be an overestimate and may therefore overstate the Project’s transportation efficiency and understate the actual GHG emissions and VMT impacts, thereby underestimating the level of mitigation required. The use of 446 employees results in a conservative estimate of the Project’s VMT impacts. In accordance with the City’s VMT Guidelines, the VMT analysis utilized OCTAM, which is the transportation analysis model maintained by the Orange County Transportation Authority. OCTAM was also used to evaluate the potential VMT impacts of other resort/hotel uses in Orange County, including the DisneylandForward project. As shown in the Project’s VMT analysis in the Draft SEIR and Appendix D to the Draft SEIR, Vehicle Miles Traveled (VMT) Memorandum, the VMT per employee is estimated as 15.3 VMT per employee, which is above the City’s VMT significance threshold of 14.6 VMT per employee and therefore requires mitigation. The VMT analysis recommends two mitigation measures (**Mitigation Measure [MM] TRA-1** and **MM-TRA-2**) that are feasible and would reduce the Project’s VMT impact from its employees to less than significant levels. Additional VMT reduction measures are included as part of **MM-GHG-5**. As to the GHG emissions analysis, relying on expert analysis, reasonably foreseeable occupancy scenarios, and established methodologies and significance thresholds, the Draft SEIR properly evaluated the proposed Project’s potential GHG emissions. The Draft SEIR discloses that, even with implementation of all feasible on-site mitigation (**MM-GHG-1** through **MM-GHG-14**) and carbon offsets (**MM-GHG-15**), emissions would remain significant and unavoidable.

The comment states that the Project does not adequately consider more effective climate strategies. The Draft SEIR analyzed and disclosed the Project's potentially significant GHG impacts with and without mitigation. That analysis included an evaluation of PDFs and feasible mitigation measures, some of which were based on measures identified in CalEEMod or on CAPCOA recommendations, although CEQA does not require inclusion of any CAPCOA measures for a GHG emissions analysis. The Project's PDFs and mitigation measures do not mirror CAPCOA language verbatim; rather, they were intentionally tailored to reflect Project-specific design features, construction methods, and operational characteristics. This approach is consistent with CEQA best practice and CAPCOA guidance, which anticipates that lead agencies will adapt recommended measures to suit individual projects. In compliance with CEQA, the Draft SEIR's analysis documents the basis for any reductions in GHG emissions or impacts based on application of the PDFs and mitigation measures.

The comment states that the Project should incorporate mixed uses. The Draft SEIR included a mixed-use alternative with residential and hotel uses. As the Draft SEIR analyzed and disclosed, both an exclusively residential and a mixed-use housing alternative are addressed in the "Alternatives Considered but Rejected" section (Draft SEIR, Section 6.3.4, Residential Alternative, p. 6-4, and Section 6.3.6, Mixed-Use Development Alternative, pp. 6-5 and 6-6). The Draft SEIR demonstrates that neither of those options is feasible or capable of meeting the Project's objectives, nor would the options clearly reduce potentially significant VMT or GHG emissions impacts associated with the Project. The Project site is 3.72 acres in size and would be entirely consumed by a 500-room hotel, themed pool deck, parking garage, and amenities. There is no land available for housing on the Project site without fundamentally reducing the hotel's size. A reduced hotel size alternative was considered and rejected in the Draft SEIR because it would not meet most of the Project's basic objectives. A mixed-use alternative that reduces site of the hotel to accommodate housing would not attain the primary objective of a fully programmed destination resort hotel.

## References

City of Garden Grove. 2008. *Garden Grove General Plan*. <https://ggcity.org/planning/general-plan>.

City of Garden Grove. 2023. "2021–2029 Housing Element." Chapter 12 in *Garden Grove General Plan*. Resolution No. 9825-23. Adopted October 10, 2023. <https://ggcity.org/sites/default/files/gghea.pdf>.

ITE (Institute of Transportation Engineers). 2025. *ITE Trip Generation Manual, 12th Edition*. August 2025. <https://www.ite.org/technical-resources/topics/trip-and-parking-generation-v2/trip-generation-info/>.

---

# **Appendix A**

## Employee VMT Estimation for Site B-2 Hotel Project Memorandum

## MEMORANDUM

---

**To:** Priit Kaskla, Monica Covarrubias (City of Garden Grove)  
**From:** Sandipan Bhattacharjee (Translutions)  
Sabita Tewani, AICP, PTP (Dudek)  
**Subject:** Employee VMT Estimation for Site B-2 Hotel Project  
**Date:** May 1, 2026  
**cc:** Rachel Struglia, Dudek  
**Attachments:** Excerpts from U.S. Bureau of Labor Statistics  
Excerpts from LADOT and DCP 2020  
Excerpts from Millennium Hollywood Project, Crain and Associates 2013  
Excerpts from SCAG Employment Density Study 2001

---

The Draft SEIR, including the technical appendices, included substantial evidence supporting the methodology used to estimate the number of employees conducted for the Site B-2 Hotel Project (Project), for purposes of performing the vehicle miles traveled (VMT) and greenhouse gas (GHG) emissions analysis. Comment Letter O2 on the Draft Supplemental Environmental Impact Report (SEIR), received from the Law Office of Jordan R. Sisson for UNITE HERE Local 11 on November 6, 2025, questioned that methodology. This memorandum provides further validation for the rationale and employee VMT estimation methodology applied in the Draft SEIR.

Dudek reviewed the City of Garden Grove (City) Economic Development Report & Analysis B-2 Site (Economic Development Report; Garden Grove 2022). As the Economic Development Report discloses, the City prepared that report for purposes of complying with state law requirements relative to agencies providing public subsidies and disposing of public properties. The Economic Development Report was not prepared for the purposes of California Environmental Quality Act analysis of VMT. Nonetheless, the Economic Development Report provides further validation that the employee estimation used in the Draft SEIR is reasonable. Based on the Job Creation Estimation (page 11 Garden Grove 2022), the Project is estimated to result in 380 full-time equivalent (FTE) hotel jobs. Based on the U.S. Bureau of Labor Statistics, approximately 34% of employees in the hospitality industry work part time. By applying this percentage split, approximately 66% of 446, or 294 employees, would be full time, and 34%, or 152 employees, would be part time. According to the estimate of hours worked per week from U.S. Bureau of Labor Statistics Accommodation and Food Services: NAICS 72, the average weekly hours for occupations commonly found in accommodation and food services ranges from 23.7 to 25.9 hours (U.S. Bureau of Labor Statistics 2026). This analysis used an average of 25 hours per week for part-time work and 40 hours per week for full-time work; 152 part-time employees would be equivalent to 95 FTE (i.e.,  $152 \times 25 / 40$ ). The Project's FTE would be 294 full-time + 95 part-time = 389 employees. Therefore, the Project's 446 employees would be equivalent to 389 FTE, similar to the 380 FTE identified in the Economic Development Report.

As explained in the Draft SEIR, the closest fit from the SANDAG transportation model (SANDAG Model) maintained by the San Diego Association of Governments (SANDAG) was found to be "High Rise Hotel." The San Diego region has a number of hospitality uses with features and operations similar to the proposed Project, including several destination and non-destination hotels. The City's technical experts also consulted SCAG's Employment Density Study Summary

Report (SCAG 2001). Per Table 6A, p. 19, the average employee per acre for Hotel/Motel is 35.06 employees per acre. Given the Project site is 3.72 acres, use of that approach would result in an estimate of 130 employees. Based on our experience, and after consultation with the Project developer and City staff, it was determined that use of that approach for estimating Project employment was not reasonable or supportable given the nature of the Project. The number of employees was also nowhere near the number calculated using SANDAG’s methodology or the range provided by City of Hotels (2025). The ITE Trip Generation Manual was also consulted (2025), but it does not include a method to estimate the number of employees for this land use. It should be noted that City of Los Angeles VMT calculator uses 0.5 employees per room for both hotel and motel use (LADOT and DCP 2020). However, the space allocated to, and employees required for, ancillary uses such as meeting rooms, retail, and restaurants are not same for hotels and motels. Therefore, using only 0.5 employees per room to estimate the number of employees for the Project was not considered appropriate or realistic.

For a further check on the reliability of the methodology used in the Draft SEIR, we estimated the number of Project employees using City of Los Angeles VMT Calculator documentation for hotel/motel and adding employees for ancillary uses, SCAG Employee Density 2001, and employee ratio derived from ITE trip rates as used in the Millennium Hollywood Project (Crain and Associates 2013). See Tables 1 and 2,

With each methodology (including the FTE estimate per economic report), the total number of employees was found to be comparable to the employee estimate used in the Project’s VMT analysis. Based on our experience and the various approaches evaluated, we determined that the SANDAG model provided the most appropriate and reliable basis for estimating the Project’s employee service population.

**Table 1. Number of Employees Estimated Using City of Los Angeles VMT Calculator Documentation**

Project Component	Employment Density <sup>a</sup>	Emp./Unit	No. of Units (Rooms or TSF)	No. of Employees
Rooms	0.5 per room	0.5	500 rooms	250
Ballroom	2 per TSF	2	9.49 TSF	19
Meeting room	2 per TSF	2	8.225 TSF	16
Food	2 per TSF	4	22.296 TSF	89
Arcade	2 per TSF	2	7.000 TSF	14
Themed amenities	2 per TSF	2	13.238 TSF	26
Spa	2 per TSF	2	8.532 TSF	17
<b>Total employees</b>				<b>431</b>

Source: LADOT and DCP 2020.

Notes: emp. = employees; TSF = thousand square feet.

<sup>a</sup> Based on LADOT and DCP 2020.

**Table 2. Number of Employees Estimated per ITE and SCAG Employee Density Survey Used in the Millennium Hollywood Project**

Project Component	Employment Density	Emp./Unit	No. of Units (Rooms or TSF)	No. of Employees
Rooms	0.57 per room <sup>a</sup>	0.57 per room	500 rooms	285
Ballroom	1 per 424 square feet <sup>b</sup>	2.35 per TSF	9.49 TSF	22
Meeting room			8.225 TSF	19
Food			22.296 TSF	53
Arcade			7.000 TSF	17
Themed amenities			13.238 TSF	31
Spa			8.532 TSF	20
			<b>Total employees</b>	<b>447</b>

**Source:** Crain and Associates 2013.

**Notes:** ITE = Institute of Transportation Engineers; SCAG = Southern California Association of Governments; emp. = employees; TSF = thousand square feet.

<sup>a</sup> Per ITE trip rate conversion used to estimate employee per room ratio in Millennium Hollywood Project.

<sup>b</sup> Per SCAG 2001, Employee Density Study, Table 5A.

## References

City of Garden Grove. 2022. City of Garden Grove Economic Development Report & Analysis, B-2 Site: NewAge Garden Grove II, LLC Nickelodeon Resort Hotel Prepared Pursuant to Government Code Sections §53083 and §52201. August 28, 2022. <https://ggcity.org/sites/default/files/economic-development-report-and-analysis.pdf>.

City of Hotels. 2025. "Hotel Staff." Online article. <https://www.city-of-hotels.com/165/hotel-staff-en.html>.

Crain and Associates. 2013. "Millennium Hollywood Project Transportation Modeling Procedures and Results." Appendix B in the *Final Environmental Impact Report for the Millennium Hollywood Project*, City of Los Angeles, February 8, 2013. February 1, 2013.

ITE. 2025. *Trip Generation Manual*, 12th Edition. August 2025. <https://www.ite.org/technical-resources/topics/trip-and-parking-generation-v2/trip-generation-info/>.

LADOT and DCP (Los Angeles Department of Transportation and Los Angeles Department of City Planning). 2020. *City of Los Angeles VMT Calculator Documentation*, Version 1.3. May 2020. [https://ladot.lacity.gov/sites/default/files/documents/vmt\\_calculator\\_documentation-2020.05.18.pdf](https://ladot.lacity.gov/sites/default/files/documents/vmt_calculator_documentation-2020.05.18.pdf).

SANDAG (San Diego Association of Governments). 2023. SANDAG ABM2+ Version 14.2.2. File containing information on land use unit type. Email communication between C. Arellano and S. Tewani. September 11, 2023.

SCAG (Southern California Association of Governments). 2001. *Employment Density Study Summary Report*. October 31, 2001. Prepared by The Natelson Company Inc. for SCAG. <https://docplayer.net/30300085-Employment-density-study-summary-report-october-31-prepared-for-southern-california-association-of-governments.html>.

U.S. Bureau of Labor Statistics. 2026. "Industries at a Glance: Accommodation and Food Services: NAICS 72." Accessed April 22, 2026. <https://www.bls.gov/iag/tgs/iag72.htm#earnings>.

---

# Excerpts from US Bureau of Labor Statistics

## Accommodation and Food Services: NAICS 72 : U.S. Bureau of Labor Statistics

<https://www.bls.gov/iag/tgs/iag72.htm#earnings>

### Employment by Occupation

Data series	Employment, 2024
<a href="#">Combined food preparation and serving workers, including fast food</a>	3,313,790
<a href="#">Cooks, fast food</a>	647,470
<a href="#">Cooks, restaurant</a>	1,356,300
<a href="#">Hotel, motel, and resort desk clerks</a>	249,430
<a href="#">Waiters and waitresses</a>	2,116,650

(Source: [Occupational Employment and Wage Statistics](#))

### Projections



For projected (future) employment estimates, see the [National Employment Matrix](#), which includes employment estimates by industry and occupation for accommodation and food services.

(Source: [Office of Occupational Statistics and Employment Projections](#))

### Earnings and Hours



This section presents data on employee earnings and weekly hours. The latest industry averages of hourly earnings and weekly hours, as well as weekly earnings by union membership status, are shown. In addition, recent hourly and annual earnings are shown for occupations commonly found in accommodation and food services. This section also contains information on the average cost of benefits paid by employers, as well as recent rates of change in wages and total compensation.

#### Earnings and Hours of All Employees

Data series	Back data	Nov. 2025	Dec. 2025	Jan. 2026	Feb. 2026
<a href="#">Average hourly earnings</a>		\$22.04	\$22.36	\$22.20	<sup>(p)</sup> \$22.44
<a href="#">Average weekly hours</a>		25.9	25.6	25.1	<sup>(p)</sup> 25.8
<b>Footnotes</b>					
(p) Preliminary					

(Source: [Current Employment Statistics](#))

#### Earnings and Hours of Production and Nonsupervisory Employees

Data series	Back data	Nov. 2025	Dec. 2025	Jan. 2026	Feb. 2026
<a href="#">Average hourly earnings</a>		\$19.94	\$20.28	\$20.08	<sup>(p)</sup> \$20.38
<a href="#">Average weekly hours</a>		24.6	24.3	23.7	<sup>(p)</sup> 24.6
<b>Footnotes</b>					
(p) Preliminary					

(Source: [Current Employment Statistics](#))

---

# Excerpts from LADOT and DCP 2020

affordable housing sites in the Los Angeles area. More information on the Affordable Housing rates can be found in **Appendix B**.

- Multi-Family Dwelling: Use 2002 Multi Family Trip Rates from the San Diego Association of Governments (SANDAG) of six trips per unit<sup>2</sup>. This Southern California based rate more closely matches rates that were observed in Los Angeles.

Land Use	Unit	ITE Code	Daily Vehicle Trip Rate <sup>A</sup>	Population/ Jobs Per Unit <sup>B</sup>
Single Family Residential	DU	210	9.52	3.15
Multi-Family Residential	DU	NA <sup>C</sup>	6.00	2.25
Townhouse	DU	230	5.81	2.25
Affordable Housing - Family	DU	NA <sup>D</sup>	4.16	3.14
Affordable Housing - Senior	DU	NA <sup>D</sup>	1.72	1.21
Affordable Housing - Special Needs	DU	NA <sup>D</sup>	1.49	1.85
Affordable Housing - Permanent Supportive	DU	NA <sup>D</sup>	1.23	1.12
General Retail	KSF	820	42.70	2.0
Furniture Store	KSF	890	5.06	0.75
Pharmacy/Drugstore	KSF	880	90.06	2.0
Supermarket	KSF	850	102.24	4.0
Bank	KSF	912	148.15	5.0
Health Club	KSF	492	32.93	1.0
High-Turnover Sit-Down Restaurant	KSF	932	127.15 <sup>E</sup>	4.0
Fast-Food Restaurant	KSF	932	127.15 <sup>E</sup>	6.7
Quality Restaurant	KSF	931	89.95	4.0
Auto Repair	KSF	942	26.80	1.0

<sup>2</sup> San Diego Association of Governments, *(Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region*, April 2002.



Home Improvement Superstore	KSF	862	30.74	2.2
Free-Standing Discount Store	KSF	813	50.75	2.0
General Office	KSF	710	Log Equation <sup>F</sup>	4.0
Medical Office	KSF	720	36.13	3.0
Light Industrial	KSF	110	6.97	1.0
Manufacturing	KSF	140	3.82	0.5
Warehousing/Self-Storage	KSF	151	2.50	0.33
Hotel (including restaurant, facilities, etc.)	Rooms	310	8.17	0.5
Motel	Rooms	320	5.63	0.5
Movie Theater (Theater with Matinee)	Seats	444	0.70	0.02
University	Students	550	1.71	0.25
High School	Students	530	1.71	0.1
Middle School	Students	522	1.62	0.1
Elementary School	Students	520	1.29	0.1
Private School (K-12)	Students	534	2.48	0.15

A: Source: Institute of Transportation Engineers, *Trip Generation, 9<sup>th</sup> Edition*, 2012, except where otherwise noted.

B: See Section 3.4.

C: Multi-Family uses SANDAG 2002 Multi Family Trip Rates of 6 trips per unit.

D: These rates were determined from vehicle trip counts conducted at 42 affordable housing sites in the City of Los Angeles. Because these local data reflect conditions in Los Angeles more closely than ITE trip rates, the VMT Calculator applies an MXD multiplier to the base rate to improve the MXD model fit for affordable housing uses.

E: Uses the daily ITE 932 rate of 127.15 trips per thousand square feet for Suburban and Suburban Center TBZs. Urban and Compact Infill TBZs are reduced by one standard deviation (41.77 daily trips).

F: General Office uses the ITE 710 Log Equation when office space is of sufficient size (above 206 KSF). When the office space is at or below this size, and the log equation exceeds 11.03 trips per KSF, General Office uses the ITE average rate of 11.03 trips per KSF.

## 3.2 MXD Reductions

### 3.2.1 MXD Methodology

The ITE trip generation methodology is primarily based on data collected at suburban, single-use, freestanding sites. These defining characteristics limit ITE's applicability to mixed-use or multi-use development projects, and may not accurately estimate the project vehicle trip generation. In response to the limitations in the ITE methodology, and to provide a straightforward and empirically validated method of estimating vehicle trip generation at mixed-use developments,



---

Excerpts from Millennium Hollywood Project,  
Crain and Associates 2013

## **Appendix B**

### **Transportation Modeling Procedures and Results**

## Millennium Hollywood Project Transportation Modeling Procedures and Results

The Traffic Study prepared for the Draft EIR determined that the Project impacts to freeway segments would be less than significant based on the Los Angeles County Congestion Management Program (CMP) criteria. The analysis and the methodology (CMP criteria) were approved by the Los Angeles Department of Transportation (LADOT). Further support is provided by the Hollywood Community Plan Update Environmental Impact Report as the Hollywood Community Plan Update was also determined not to have a significant impact on the freeway system. To further verify these conclusions, an additional model analysis was conducted. The analysis used the current Southern California Association of Governments (SCAG) model for year 2035, as refined by LADOT for use in the City of Los Angeles, for the initial future projections (the Base Model).

To determine the Project impacts based on the Base Model, it was necessary to determine the demographic characteristics of the Project. A set of demographic density rates of the different Project land uses are included in Table 1. The Los Angeles County rates from *The Employment Density Study Summary, The Natelson Company, October 31, 2001*, prepared for SCAG were used to estimate the employee density in terms of building area for the Project commercial uses (except hotel, which was specified by room, rather than building area). For residential uses, data on daily trip generation from the ITE Land Use Code 220 was reviewed and the weekday trip generation ratio indicated 2.01 persons per unit. To be conservative, ratios of 2.5 persons and 1.2 workers per unit were assumed (e.g., those used in other studies for single family housing units). For hotel rooms, data on daily trip generation from the ITE Land Use Code 310 was reviewed and the weekday trip generation ratio indicated 0.57 employees per room. Table 2 shows the rates utilized and the resulting demographic estimates.

The Project impacts were analyzed using the Base Model rerun for scenarios assuming two different conditions. Those scenarios addressed the case that the Project, or similar land-uses for the Project Site, was included within the Base Model assumptions and, alternatively, the case that the Project was an incremental addition to the Base Model assumptions. The two cases were examined since the Base Model zones each contain a larger area than the Project Site and greater amount of land-uses than the Project. This was further complicated by the Project Site being partially within each of two zones. Table 3 shows the Model Demographic data split between the two zones.

To create the model demographics input data for the two reruns, 1) the demographics for the Project land uses were subtracted from the Base Model demographics for the Central Hollywood zones that included the Project Site, and 2) the Project demographics were added to the Base Model demographics for the those zones. The results from the model reruns were compared to the Base Model results to determine the Project impact.

**Table 1**  
**Model Demographic Rates and Overall Estimates**

<u>Source</u>	<u>Land Use</u>	<u>ITE Daily Trip Rate</u>		<u>Density Rate</u>	<u>Size</u>	<u>Estimate</u>
<b><u>Residential</u></b>						
ITE LU 220	Apartment	[A]	6.65	trips/ dwelling unit		
		[B]	3.31	trips/ person		
		[A]/[B]	2.01	person/ dwelling unit	2.5 person/du 1.2 worker/du	461 1,153 persons 461 553 workers
<b><u>Office</u></b>						
SCAG	General Office				1 emp. / 440 sf	264,303 601 other emp.
<b><u>Other Commercial</u></b>						
SCAG	Health/Fitness Club				1 emp. / 424 sf	80,000 189 service emp.
SCAG	Retail				1 emp. / 424 sf	100,000 236 retail emp.
SCAG	Quality Restaurant				1 emp. / 424 sf	25,000 59 retail emp.
ITE LU 310	Hotel	[A]	8.17	trips/ room		
		[B]	14.3	trips/ employee		
		[A]/[B]	0.57	employee/ room	0.57 emp./room	254 145 service emp.

**Table 2**  
**Demographic Estimates by Model Variable**

<u>LU</u>	<u>Use/Description</u>	<u>Size</u>	<u>Units</u>	<u>Rate(s)</u>	<u>Source</u>	<u>Demographics</u>					
						<u>Population</u>			<u>Employees</u>		
						<u>TotPop</u>	<u>ResdPop</u>	<u>Workers</u>	<u>Retail</u>	<u>Service</u>	<u>Other</u>
<b>Proposed Uses</b>											
220	Apartments	461	MDU	2.5 1.2	ITE	1153	1153	553			
310	Hotel	254	rooms	0.6	ITE					145	
492	Health/Fitness Club	80,000	bldg sf	1/ 424	SCAG					189	
710	General Office	264,303	bldg sf	1/ 440	SCAG					601	
820	Retail	100,000	bldg sf	1/ 424	SCAG				236		
931	Quality Restaurant	25,000	bldg sf	1/ 424	SCAG				59		
<b>Existing Uses</b>											
710	General Office	114,303	bldg sf	1/ 440	SCAG					260	

The anticipated volumes of the Hollywood freeway segments nearest to, but beyond, the Project access points were compared between the scenarios. The results from the model runs for the most impacted segments (those immediately north and south of the Project Site access) are shown and compared in the Table 4. Table 4 demonstrates that the Project will have lower impacts than the less than significant impacts shown in the Draft EIR (i.e. lower impacts than conservatively analyzed in the Traffic Study and the Draft EIR).

**Table 3**  
**Project Demographic Estimates by Site**

<b>2010 to 2035 Minimum Data Increment (Entire Site):</b>				County	Los Angeles			Residential	100%
								Office	100%
TotPop	1153	TOTHH	461	TotJobs	969	K12Sch	0	Other Com.	100%
ResPop	1153	SDU	0	RetJobs	295	ColeNR	0		
GRPQ	0	MDU	461	SrvJobs	333				
Workers	553			OthJobs	341				
<b>2010 to 2035 Minimum Data Increment (East Site):</b>				County	Los Angeles			Residential	40%
								Office	100%
TotPop	461	TOTHH	184	TotJobs	624	K12Sch	0	Other Com.	45%
ResPop	461	SDU	0	RetJobs	133	ColeNR	0		
GRPQ	0	MDU	184	SrvJobs	150				
Workers	221			OthJobs	341				
<b>2010 to 2035 Minimum Data Increment (West Site):</b>				County	Los Angeles			Residential	60%
								Office	0%
TotPop	692	TOTHH	277	TotJobs	345	K12Sch	0	Other Com.	55%
ResPop	692	SDU	0	RetJobs	162	ColeNR	0		
GRPQ	0	MDU	277	SrvJobs	183				
Workers	332			OthJobs	0				

**Table 4**  
**Projected Freeway Volumes**

<u>Segment</u>	<u>Direction</u>	<u>Year 2035 Volumes</u>				
		<u>Base Model</u>	<u>Base Minus Project</u>		<u>Base Plus Project</u>	
			<u>Model Result</u>	<u>Project Trips</u>	<u>Model Result</u>	<u>Project Trips</u>
<b><u>AM Peak Hour</u></b>						
North of Vine St.	Northbound	8,336	8,358	-22	8,362	26
	Southbound	7,718	7,720	-2	7,717	-1
South of Santa Monica Bl.	Northbound	8,534	8,555	-21	8,567	33
	Southbound	7,775	7,779	-4	7,783	8
<b><u>PM Peak Hour</u></b>						
North of Vine St.	Northbound	15,031	15,055	-24	15,039	8
	Southbound	9,323	9,328	-5	9,322	-1
South of Santa Monica Bl.	Northbound	14,476	14,501	-25	14,491	15
	Southbound	9,872	9,871	-1	9,892	21

In reviewing Table 4, note that the Project is an infill set of land uses that will intercept a proportion of the trips linked to the Project. This, combined with the mixed use and transit oriented nature of the Project, will result in trip reductions on some segments. Thus, even though the Project will add some trips to the regional system, as demonstrated in Table 4, the

Project will reduce a similar number of trips and will also have limited impacts to the volumes on the regional highway system or trip reductions on some segments. Further, the Project is infill, mixed-use and transit-oriented development as called for by SCAG in the Regional Mobility Plan and the Metropolitan Transportation Authority (Metro) in the Congestion Management Plan (CMP).

In summary, the model demonstrated that the Project will not result in the addition of 150 trips or more to any freeway segment. This analysis verifies that Project traffic impacts on the regional system will be less than significant.

---

# Excerpts from SCAG Employment Density Study 2001

BROAD POLYGON SELECTION

**Table 5A**

**Derivation of Square Feet per Employee Based on:**

**--MEDIAN EMPLOYEES PER ACRE**

**--MEDIAN FAR**

**ORANGE COUNTY**

Net/Gross Adjustment Factor:

0.75

Land Use Category	# of Records	FAR	Employees/Acre	Building Efficiency	Square Feet/Employee
Regional Retail	17	0.95	10.68	0.80	2,322
Other Retail/Svc.	234	0.24	14.87	0.85	450
Low-Rise Office	121	0.35	28.87	0.90	352
High-Rise Office	17	0.38	47.61	0.90	235
Hotel/Motel	0	--	14.01	N/A	--
R & D/Flex Space	12	0.36	21.93	0.95	511
Light Manufacturing	245	0.40	15.99	0.95	786
Heavy Manufacturing	0	--	51.99	N/A	--
Warehouse	56	0.46	10.59	0.95	1,350
Government Offices	20	0.37	26.73	0.90	408

**Table 6A**

**Derivation of Square Feet per Employee Based on:**

**--AVERAGE EMPLOYEES PER ACRE**

**--AVERAGE FAR**

**ORANGE COUNTY**

Net/Gross Adjustment Factor:

0.75

Land Use Category	# of Records	FAR	Employees/Acre	Building Efficiency	Square Feet/Employee
Regional Retail	17	0.78	28.87	0.80	704
Other Retail/Svc.	234	0.26	22.58	0.85	325
Low-Rise Office	121	0.42	43.24	0.90	287
High-Rise Office	17	0.54	72.52	0.90	218
Hotel/Motel	0	--	35.06	N/A	--
R & D/Flex Space	12	0.36	23.92	0.95	466
Light Manufacturing	245	0.41	22.60	0.95	558
Heavy Manufacturing	0	--	31.09	N/A	--
Warehouse	56	0.40	12.63	0.95	979
Government Offices	20	0.31	44.42	0.90	206