
Findings of Fact and Statement of
Overriding Considerations Pursuant to State
CEQA Guidelines

Site B-2 Hotel Project

SCH NO. 2022060174

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APPENDIX

A Supplemental Mitigation Monitoring and Reporting Program

Final Supplemental EIR SCH No. 022060174

I. Introduction

The City of Garden Grove (City) City Council hereby certifies that it has reviewed and considered the information contained in the Final Supplemental Environmental Impact Report (Final SEIR) and the record of proceedings for the Site B-2 Hotel Project (Project). On February 13, 2024, pursuant to Public Resources Code Section 21168.9(c), Judge Melissa McCormick of the Orange County Superior Court issued the Writ of Mandate (the Writ) with respect to the City's 2022 Project approval and a Petition for Writ of Mandate (Petition) filed by Marlene Perez, Maria Guadalupe Ortiz, Unite Here Local 11, and VietRISE (*Perez et al. v. City of Garden Grove et al.*, OCSC Case No. 30-2022-01281816-CU-WM-CC). The scope of the Final SEIR is defined by the Writ and relevant provisions of the California Environmental Quality Act (CEQA).

The City Council certifies that the Final SEIR has been completed in compliance with and in consideration of (i) the Writ; (ii) CEQA, Public Resources Code Section 21000 et seq.; (iii) the state CEQA Guidelines, California Code of Regulations, Title 14, Section 15000 et seq. (CEQA Guidelines); (iv) City regulations and requirements; and (v) all other applicable laws. The City Council finds that the Final SEIR reflects the independent judgment of the City (Public Resources Code Section 21082.1[c][3]).

Pursuant to the Writ, the Project's significant greenhouse gas (GHG) and vehicle miles traveled (VMT) effects were identified in both the Draft SEIR (September 2025) and the Final SEIR (May 2026). Public Resources Code Section 21081 and CEQA Guidelines Section 15091 require that the lead agency prepare written findings for each identified significant impact, accompanied by a brief explanation of the rationale. Section 15091 states, in relevant part:

- (a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects accompanied by a brief explanation of the rationale for each finding. The possible findings are:
 - (1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the Final SEIR.
 - (2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
 - (3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final SEIR.

Whenever significant impacts cannot be mitigated to below a level of significance, as the following demonstrates is the case with respect to the Project, the decision-making agency is required to balance the benefits of the proposed project against its unavoidable environmental risks when determining whether to approve the project. If the benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse effects

may be considered “acceptable,” and the agency may adopt a Statement of Overriding Considerations. CEQA Guidelines Section 15093 states, in relevant part:

- (b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the Final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the Final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.
- (c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

In accordance with the Writ; CEQA (Public Resources Code Section 21081); and the CEQA Guidelines, including, without limitation, Sections 15091, 15093, and 15160, the City Council certifies the Final SEIR, adopts these Findings of Fact and Statement of Overriding Considerations, adopts the Supplemental Mitigation Monitoring and Reporting Program (Supplemental MMRP), and approves the Project. In adopting the Supplemental MMRP, the City Council finds that it meets the requirements of Public Resources Code Section 21081.6 by providing for the implementation and monitoring of measures intended to mitigate the significant effects of the Project.

II. Organization/Format/Nature of Findings

In compliance with the statutory requirements, these findings are organized as follows:

1. Introduction to the CEQA Findings and Facts in Support of Findings and Statement of Overriding Considerations for the Site B-2 Hotel Project Final SEIR.
2. Description of the Project, including an overview of the discretionary actions required for the Project approval and a statement of the Project Objectives.
3. Findings regarding the environmental impacts of the Project that were evaluated in accordance with the Writ and CEQA and were determined to have those significant or significant effects identified in the Final SEIR which the City has determined, after application of project design features (PDFs), applicable development requirements or feasible mitigation measures identified in the Final SEIR, are less than significant.
4. Findings regarding project alternatives.
5. Findings regarding the environmental impacts of the Project that were evaluated in accordance with the Writ and CEQA and were determined to have those significant effects identified in the Final SEIR which even with incorporation of all feasible mitigation measures and consideration of alternatives, the City has determined will have significant and unavoidable impacts and require the adoption of a Statement of Overriding Considerations to approve the Project.

Each category that discusses the Project’s environmental impacts identifies the significance of the effects, PDFs, development or other legal requirements, and mitigation measures relevant to the specific effects being considered, and the findings and facts in support of those findings.

Any finding made by the City shall be deemed made, regardless of where it appears in this document or elsewhere in the record of proceedings. All of the language included in this document constitutes findings by the City, whether or not any particular sentence or clause includes a statement to that effect. The City intends that these findings be considered as an integrated whole and, whether or not any part of these findings fail to cross-reference or incorporate by reference any other part of these findings, that any finding required or committed to be made by the City with respect to any particular subject matter of the Final SEIR, shall be deemed to be made if it appears in any portion of these findings.

III. Record of Proceedings

For purposes of CEQA and these Findings, the Record of Proceedings for the Project consists of the following documents and other evidence, at a minimum:

- The Writ
- The NOP and all other public notices issued by the City in conjunction with the SEIR and the City approval process.
- The Draft SEIR including all technical appendices and reference materials.
- All written comments submitted by agencies or members of the public during the public review comment period (or otherwise) on the Draft SEIR.
- The Responses to Comments received on the Draft SEIR.
- The Mitigation Monitoring and Reporting Program.
- The Staff Report and related materials including the MND, written correspondence submitted to the City regarding the Project, Draft SEIR or Final SEIR, prepared resolutions adopted by the City of Garden Grove in connection with the Project and other project approval documents including conditions of approval.
- Matters of common knowledge to the City, including but not limited to federal, state, and local laws and regulations.
- Any documents expressly cited in these Findings, the Draft SEIR or Final SEIR.
- Any other relevant materials required to be in the record of proceedings by Section 21167.6(e) of the Public Resources Code.
- The Final SEIR.

IV. Location and Custodian of Documents

The official custodian of the documents and other materials that constitute the record of proceedings upon which the City's decision is based is identified as follows:

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

This information is provided in compliance with Section 21081.6(a)(2) of the Public Resources Code and with the California Code of Regulations, Title 14, Chapter 3, Section 15091(e).

V. Environmental Review and Public Participation

A. Notice of Preparation and Scoping Meeting

CEQA establishes mechanisms to inform the public and decision makers about the nature of a proposed project and the extent and types of impacts that the proposed project and alternatives would have on the environment should the proposed project or an alternative be implemented. Pursuant to CEQA Guidelines Section 15082, the City circulated a Notice of Preparation (NOP), published on April 18, 2025, to interested agencies, organizations, and parties. The NOP was also sent to the State Clearinghouse at the California Office of Planning and Research. The State Clearinghouse assigned a state identification number (SCH No. 2022060174).

The NOP is intended to encourage interagency communication regarding the proposed action so that agencies, organizations, and individuals are afforded an opportunity to respond with specific comments and/or questions regarding the scope and content of the EIR. A public scoping meeting was held on April 30, 2025, at 6:00 p.m. at the Garden Grove Community Meeting Center in the City of Garden Grove to gather additional public input. The 30-day public scoping period ended on May 19, 2025.

Comments received during the NOP public review period and the scoping meeting were considered as part of the preparation of the EIR. The NOP and written comments are included in Appendix A to the Final SEIR. Comments received are also summarized in Final SEIR Table 2-1.

B. Draft SEIR and Public Review

The Draft SEIR was prepared under the direction and supervision of the City. Public review of the Draft SEIR was intended to focus “on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated” as specified in the Writ and CEQA (14 CCR 15204). The Notice of Completion of the Draft SEIR was filed with the State Clearinghouse as required by CEQA Guidelines Section 15085. In addition, the Notice of Availability of the Draft SEIR was distributed pursuant to CEQA Guidelines Section 15087. The Draft SEIR and related technical appendices were available for review during the 45-day public review period, from September 22 to November 6, 2025, at the following locations:

City of Garden Grove
Economic Development and Housing Department
11222 Acacia Parkway
Garden Grove, California 92840
City of Garden Grove website:
<https://ggcity.org/planning/environmental-documents>

Interested agencies and members of the public submitted written comments on the adequacy of the Draft SEIR to the City's Economic Development and Housing Department.

VI. Responses to Comments

During the public review period, the City received a total of three comment letters from state and local agencies, organizations, and individuals on the Draft SEIR. Written responses have been prepared to all comments received during the comment period (Final SEIR, Chapter 2). A number of emails were sent to the City after the close of the public comment period, but they closely followed three primary themes: (1) use public land for affordable housing, (2) include affordable housing in the Project, and (3) the Project includes insufficient mitigation. The responses to these letters are included in Chapter 5 of the Final SEIR.

The City finds that the modifications made in the Final SEIR do not constitute significant new information requiring recirculation but rather, the information merely clarifies, amplifies, or makes insignificant modifications in an adequate EIR. Those modifications include edits to Mitigation Measure (MM) GHG-1, MM-GHG-3, MM-GHG-5, MM-GHG-7, MM-GHG-9, MM-GHG-11, and MM-TRA-2, edits to PDF-27, and the addition of two PDFs, PDF-1 and PDF-2, in response to public comments that will also be conditions of approval. Specifically, the City finds that the additional information (including the changes described above) does not show that any of the following would occur:

1. A new significant environmental impact would result from implementation of the Project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the Project, but the Project's proponents decline to adopt it.
4. The Draft SEIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

In summary, the City hereby finds that no significant new information has been added to the Final SEIR since public notice was given of the availability of the Draft SEIR that would require recirculation of the SEIR.

In compliance with Section 15088(b) of the CEQA Guidelines, the City has met its obligation to provide written responses to comments to public agencies at least 10 days prior to certifying the Final SEIR.

VII. Project Location, Description, Objectives, and Approvals

A. Location

The Project site is approximately 3.72 acres of land located at the northwest corner of Harbor Boulevard and Twintree Avenue, along the west and east sides of, and on, Thackery Drive in the City of Garden Grove. Regional access to the Project site is provided by State Route 22 and Interstate 5. Local access to the Project site is provided via Harbor Boulevard and Twintree Avenue.

The Project site is a previously disturbed property where the north/northeastern parcels of the Project site are paved and used for excess parking for the adjacent Sheraton Hotel, whereas the remaining parcels are dirt pads with limited vegetation that are currently vacant. The Project site is located within a fully developed and urbanized area. The Project site is bounded by a hotel to the north, multi-family housing to the northwest, now vacant, previously developed lots to the east of Harbor Boulevard, commercial and residential uses to the south of Twintree Avenue and residential uses to the west.

B. Project Description

The Project proposes construction and operation of a full-service high-rise (maximum height of 350 feet) resort hotel with hotel program entertainment/pool deck (height of approximately 61 feet). The proposed hotel would include 500 guest suites with balconies. For the exclusive use of hotel patrons, the proposed hotel includes amenities such as a themed pool experience with lazy river; event space with a 600-person maximum occupancy theater; a grand ballroom; meeting rooms, food and beverage opportunities, character themed amenities, an arcade, and a spa and fitness center. The proposed Project would also include a five-level (approximately 61 feet) parking garage with four levels above grade and one level below grade as well as storage and loading areas. A total of 528 parking spaces would be provided within the parking garage.

The Project would implement both construction-related and operational project design features (PDFs) that help avoid or reduce the potential for significant impacts. Project PDFs are identified in the Mitigated Negative Declaration (MND) and additional PDFs from the SEIR were incorporated into the Supplemental MMRP. Consistent with the Writ, the MND PDFs, to the extent not modified and superseded by the Final SEIR and Supplemental MMRP adopted for the Final SEIR, continue to apply to the Project. The PDFs identified in the Final SEIR, which are incorporated into the Supplemental MMRP, include the following:

- PDF-4 Construction equipment should be maintained in proper tune.
- PDF-5 All construction vehicles should be prohibited from excessive idling. Excessive idling is defined as five (5) minutes or longer.
- PDF-8 Establish an electricity supply to the construction site and use electric powered equipment instead of diesel-powered equipment or generators, where feasible.

- PDF-10 Use haul trucks with on-road engines instead of off-road engines for on-site hauling.
- PDF-11 The Project should comply with the mandatory requirements of the latest California Building Standards Code, Title 24, Part 6 (Energy Code) and Part 11 (California Green Building Standards Code [CALGreen]), including the provisions for bicycle parking, electric vehicle charging stations, energy efficiency, material conservation, and water/waste reduction.
- PDF-12 Install signage at loading docks requiring trucks to limit engine idling times to 5 minutes or less.
- PDF-21 Engine idling time for all delivery vehicles and trucks must be limited to 5 minutes or less. Signage should be posted in the designated loading areas reflecting the idling restrictions.
- PDF-27 Sustainable Building Materials. The Project will prioritize low-impact, sustainably sourced, and recyclable materials across construction and interior finishes, including low-VOC paints, Forest Stewardship Council-certified wood, and recycled-content flooring. The Project is also implementing vendor standards that require environmental product declarations and third-party certifications to verify material sustainability. Materials shall be selected not only for their initial environmental footprint but also for durability and long-term performance, reducing the need for frequent replacement and associated waste.
- 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.

C. Project Objectives

Section 15124(b) of the CEQA Guidelines requires that an EIR include a statement of the project objectives that “include[s] the underlying purpose of the project and may discuss the project benefits.” The Draft SEIR included the following objectives:

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

- Support increased tourism in the City while also complementing other tourist destinations in surrounding communities.
- Generate a material amount of transient occupancy and property tax revenue for the City.
- Generate additional construction and operational jobs to support the local and regional economy.
- Develop a facility of sufficient size and with sufficient amenities to attract a partnership with a national or international theme park franchise.

VIII. Environmental Impacts

Pursuant to the Writ and CEQA and the CEQA Guidelines, the City as the lead agency under CEQA is responsible for certification of the SEIR and, as reflected in this document and the record of proceedings, has made the following findings:

1. The City Council has reviewed and considered the information in the Final SEIR, which has been completed in compliance with CEQA;
2. The Final SEIR reflects the City's independent judgment and analysis; and,
3. The City Council adopts the Supplemental MMRP (Attachment A) to reduce or avoid the significant and mitigable impacts of the Project.

Even with the imposition of the Supplemental MMRP, the Project will have significant and unavoidable impacts as described in the Final SEIR and these findings.

A. The Writ and MND Environmental Effect Determinations

In 2022, the City Council and/or Successor Agency approved the Project. Those approvals included an amendment of PUD-141-01 establishing development standards for the Project (PUD), a Site Plan approval of the Project design, a Street Vacation, declaration of the intent to vacate and abandon Thackery Drive, adoption of an MND and MMRP, and approval of Disposition and Development Agreements addressing the conveyance and development of the Project site (collectively, Approvals). Those Approvals, and the MND in particular, were challenged in litigation filed in Orange County Superior Court (*Perez et.al. v. City of Garden Grove et al.* OCSC Case No. 30-2022-01281816-CU-WM-CC.). That litigation led to the Court's entry of the Writ, a copy of which is attached to the Draft SEIR as Appendix B.

Pursuant to the Writ, except as specified in the language from the Writ quoted immediately below, all claims challenging the Approvals were dismissed with prejudice and the City and developer were directed to:

- (a) prepare a focused review under CEQA of the Project's or modified Project's potentially significant Vehicle Miles Travelled (VMT) and Greenhouse Gas (GHG) impacts;
- (b) assess whether modifications are needed to the Approvals, including any mitigation measures and conditions of approval, in light of that focused CEQA analysis; and

- (c) approve, approve with modifications, or deny the PUD in open session during a publicly agendized meeting of the City Council pursuant to Municipal Code section 9.32.030.

The Project's potentially significant CEQA impact areas evaluated in the MND, that were validated by the Writ and did not require focused CEQA review, include Aesthetics, Agricultural and Forest Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology/Soils, Hazards and Hazardous Materials, Hydrology/Water Quality, Land Use Planning, Mineral Resources, Noise, Population/Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities/Service Systems, Wildfire, and Mandatory Findings of Significance. For all those topic areas, the Project impacts were determined to be less than significant and any and all objections to those determinations were dismissed by the Writ or the challenge period has expired. Consistent with the Writ, the Final SEIR conducted the focused review under CEQA of the Project's potentially significant VMT and GHG emissions impacts.

B. Environmental Effects Mitigated to Below a Level of Significance

Pursuant to Section 21081(a) of the Public Resources Code and Section 15091(a)(1) of the state CEQA Guidelines, the City finds that, for each of the significant effects described in this Section and as identified in the Final SEIR, changes or alterations have been required in, or incorporated into, the Project which mitigate or avoid the identified significant effects on the environment to less than significant levels. The significant effects and mitigation measures are stated fully in the Final SEIR and each of the mitigation measures have been imposed. These findings are explained below and are supported by substantial evidence in the record of proceedings. Analysis of the individual findings is set forth below and the record of proceedings includes the substantial evidence supporting the findings.

1. Transportation

Threshold of Significance

- Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Mitigation Measures

MM-TRA-1 Implement Commute Trip Reduction Marketing: The Project Applicant shall implement a marketing strategy to promote the Project site employer's Commute Trip Reduction (CTR) program. Information sharing and marketing promote and educate employees about their travel choices to the employment location beyond driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT and GHG emissions.

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

- a) The Applicant shall provide on-site or online commuter information services to employees. The Applicant shall also distribute a quarterly newsletter with tips, success stories and updates to ensure education and encouragement for the CTR program.

- b) The CTR shall require the Project Applicant or their designee to appoint a Commute Program Coordinator to oversee the implementation and management of the marketing strategy.
- c) The Applicant shall ensure on-site or online subsidized transit pass sales are available to all employees.
- d) The Applicant shall provide guaranteed ride home service by matching employees with other employees or providing access to platforms such as Rideharing.com and Lyft 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 9B)

MM-TRA-2 **Provide End-of-Trip Bicycle Facilities:** 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)*

Finding

The City finds that, with implementation of mitigation measure MM-TRA-1 and MM-TRA-2, changes or alterations have been required in, or incorporated into, the Project which mitigate or avoid the significant effects on the environment as the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). The City finds that these mitigation measures are feasible, are adopted and would reduce the vehicle miles travelled impacts and the related cumulative impacts of the proposed project to less than significant levels.

Facts in Support of Finding

The Project would have significant impacts related to conflict with CEQA Guidelines Section 15064.3, subdivision (b) that will be mitigated to below significance with the application of MM-TRA-1 and MM-TRA-2. Thus, as mitigated, the Project would have a less than significant impact as the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b). The SEIR evaluated the Project to determine whether a project specific vehicle miles traveled (VMT) analysis was required under the City's formally adopted VMT Guidelines. Those guidelines provide that projects within a Transit Priority Area (TPA) may be presumed to have a less than significant impact absent substantial evidence to the contrary unless one of four exceptions apply. Although the Project site is within a TPA and substantial evidence supported the conclusion that the four exceptions did not apply, the Final SEIR includes a Project-specific VMT model run and analysis that complies with the methodology established by the VMT Guidelines.

As required by the VMT Guidelines, the Final SEIR's Project specific VMT analysis evaluated the Project generated VMT and the Project effect on VMT. As the Final SEIR disclosed, and as specified by the VMT Guidelines, the Final SEIR's VMT analysis used the then current version of OCTAM with socio-economic data to perform a Project specific VMT model run. Using the OCTAM model, the Project generated VMT was calculated using the Origin/Destination

(OD) methodology (which quantifies the total VMT per service population) and the Production/Attraction (PA) methodology (which quantifies the home based work VMT per employee). Under the VMT Guidelines methodology for the OD analysis, the Project is evaluated against the Orange County Baseline OD VMT per service population impact threshold of 21.6. With a Project Baseline OD VMT per service population of 15.2, the Final SEIR demonstrates that the Project has a less than significant direct impact under the OD methodology.

With respect to the Project generated VMT using the PA methodology, the Final SEIR demonstrated that the Project generated HBW VMT per service population would be 15.3. As that amount of HBW VMT per employee exceeds the Orange County impact threshold of 14.6, the Final SEIR disclosed that Project's direct impacts under the PA methodology would be significant without mitigation. To reduce those potential impacts to less than significance, the attached Supplemental MMRP imposes MM-TRA-1 and MM-TRA-2. MM-TRA-1 imposes a commute trip reduction marketing requirement with a specific performance standard for the Project of at least a 4% VMT reduction through implementation of five specific measures identified in the mitigation measure. MM-TRA-2 requires the Project to install and maintain end of trip bicycle facilities for Project employees. Final SEIR Table 4.2-4, and the expert prepared technical analysis supporting the same, demonstrate that the Project required a 4.25% reduction in PA VMT to achieve a less than significant impact and the Project with imposition of MM-TRA-1 and MM-TRA-2 would achieve a 4.88% reduction. Therefore, the record reflects that Project with mitigation would have a less than significant direct VMT impact using the PA methodology.

Consistent with the VMT Guidelines, the Final SEIR's Project effect on VMT analysis uses the link based VMT methodology for the Project's geographic region. That approach uses the boundary method and link-level VMT within the City boundary. As the VMT Guidelines dictate, the methodology evaluates all trips, including those trips that do not begin or end in the designated boundary, and captures the effect of cut-through and/or displaced traffic. The Project effect on VMT is then calculated by dividing the citywide roadway VMT by the City's service population. The analysis showed that baseline Project effect on VMT per service population would be 10.96. As that amount of VMT does not exceed the baseline VMT per service population without the Project of 10.96, the direct Project effect on VMT would be less than significant.

Cumulative Transportation Impacts

The SEIR included a quantitative analysis of the Project's potential for cumulatively considerable impacts per City's VMT Guidelines. For Project generated VMT using the OD methodology, the Final SEIR demonstrated a less than significant cumulative impact at 13.6 OD VMT per service population compared to the impact threshold of 21.6. For Project generated VMT using the PA methodology, the Final SEIR's analysis disclosed a less than significant cumulative impact as the Project generates a HBW VMT per employee of 14.0 was measured against the Orange County HBW VMT per Employee Impact Threshold of 14.6. As the Project generated VMT in the cumulative condition is less than the respective impact thresholds, the cumulative Project generated VMT was determined to be less than significant. Under the Project effect on VMT approach in the cumulative condition, using the link based VMT methodology, the Final SEIR analysis disclosed that the "with Project" VMT per service population would be 11.20. As the "without Project" cumulative VMT per service population using the link method would be higher at 11.21, the Project's cumulative VMT effects would be less than significant without mitigation.

2. Greenhouse Gas Emissions

Threshold of Significance

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

The SEIR assessed and made a determination as to whether the Project had the potential to conflict with the Southern California Association of Governments (SCAG) Connect SoCal 2024, California Air Resources Board (CARB) 2022 Scoping Plan, and applicable policies of the General Plan.

Mitigation Measures

MM-GHG-1 **Construction Equipment Electrification.** Prior to issuance of building permits, the Project Applicant's or designee's contractor shall submit an 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.
- (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 Mitigation Monitoring and Reporting Program (MMRP) file. (*CAPCOA Measure C-1-A is a quantitative measure*)

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 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 is a qualitative measure*)

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

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

- Improve the walkability and design of the Project by providing pedestrian and bicycling connections within the Project site and to adjacent off-site facilities (e.g., sidewalks, crosswalks, wayfinding signage).
- 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 local bus routes and schedules, as well as wayfinding to the existing transit stops 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 are qualitative measures)

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

MM-GHG-7 **Building Energy Efficiency Measures.** Prior to issuance of building permits, the Project Applicant or designee shall submit documentation of building energy efficiency measures to the City of Garden Grove, 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.
 - b. Smart thermostats, which include a motion sensor detector and door/window open sensors, will be installed in each guest room.
 - c. The central plant will utilize a Combination Plant with SmartPlate EV.
4. **Glazing** – All glazing for the tower and exterior public spaces shall be installed with Low-E glass [U-factor (thermal transmittance) ≤ 0.28 and Solar Heat Gain Coefficient (SHGC) ≤ 0.23].
5. **Energy Management System** – The Project shall use advanced systems to monitor and optimize energy use in real time.
6. **Benchmarking and Monitoring** – The Project shall incorporate an Energy Star Portfolio Management system to track and manage energy consumption.
7. **Third-Party Verification/LEED Certification** – The Project shall obtain third-party HVAC commissioning verification or LEED certification 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 would be located within a screened utility area 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-8 **Cool Roof/Deck.** Prior to issuance of building permits, the Project applicant or designee shall submit plans to the City for approval that require cool roof and cool deck surfaces to be included as part of the Project for the podium and tower, consistent with the specifications provided below.

- **Cool Roof Installation:** All roofing materials shall meet or exceed the California Title 24, Part 6 requirements for cool roofs, based on roof slope:
 - Low-sloped roofs (\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 is a qualitative measure)

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 is quantified)*

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

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

(CAPCOA Measures W-2, W-5, and W-7 are quantified)

MM-GHG-11 **Waste Reduction.** Prior to issuance of the final certificate of occupancy, the Project Applicant or designee shall submit a Waste Management, Recycling, and Composting Plan to the City of Garden Grove for review and approval. The program shall be implemented on-site at the Project location and apply to all operational areas, including guest services, food and beverage operations, maintenance, and administrative functions. The waste reduction program shall be fully implemented during Project operations. The Plan shall specify a minimum diversion of 25% of municipal solid waste, 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
 - 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
 - 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 is quantified; 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 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 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 is quantified)

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 are quantified, CAPCOA Measure R-7 is qualitative and not quantified)*

MM-TRA-1 Implement Commute Trip Reduction Marketing: The Project Applicant shall implement a marketing strategy to promote the Project site employer's Commute Trip Reduction (CTR) program. Information sharing and marketing promote and educate employees about their travel choices to the employment location beyond driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT and GHG emissions.

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

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

(CAPCOA Measures T-7 and T-9-B are quantifiable measures, but no GHG reductions are taken for those measures)

MM-TRA-2: Provide End-of-Trip Bicycle Facilities: 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 is a quantifiable measure, but no GHG reduction is taken for this measure)*

Project Design Features

Construction

- PDF-4 Construction equipment should be maintained in proper tune.
- PDF-5 All construction vehicles should be prohibited from excessive idling. Excessive idling is defined as 5 minutes or longer. *(CAPCOA Measure C-2)*
- 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)*

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

Operations

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

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

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

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.

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.

Finding

The City finds that, with implementation of MM-GHG-1 through MM-GHG-14 and PDFs 4, 5, 8,10,11, 12, 21, 27, 28, and 29, changes or alterations have been required in, or incorporated into, the Project which mitigate or avoid the potentially significant effects on the environment. With the incorporation of the measures identified in the Supplemental MMRP, the Project would have a less than significant impact related to a conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. The City finds that these mitigation measures and PDFs are feasible, are adopted, and would reduce the potentially significant GHG impacts related to this significance threshold to a less than significant level.

Facts in Support of Finding

The Final SEIR's analysis of significance threshold GHG-2 showed that the Project would conflict with some of the applicable Connect SoCal 2024 Plan, the 2022 Scoping Plan, and the General Plan goals and policies adopted for

the purpose of reducing the emissions of GHGs. With respect to this threshold of significance and prior to imposition of applicable mitigation and the PDFs, potentially significant impacts would occur. With the application of MM-GHG-1 through MM-GHG-14, MM-TRA-1 and MM-TRA-2, and the applicable PDFs, the Project impact would be reduced to less than significant under significance threshold GHG-2. The Final SEIR analyzed the Project in relation to each of the relevant goals, policies, implementation measures and sectors from the above-referenced plans. Final SEIR Tables 4.1.6, 4.1.7, and 4.1.8 summarize the analysis and categorize the Project's potential to conflict with those plans into determinations of no conflict, not applicable, and no conflict with mitigation. Each categorization includes a summary of the analysis that supports the determination. For those areas where the determination was "no conflict with mitigation," the summary describes how the applicable mitigation measure or PDF eliminate the potential conflict. As disclosed in Tables 4.1.6, 4.1.7, and 4.1.8, the Project would support infill development and transit-adjacent land use patterns consistent with Connect SoCal 2024; avoid interference with implementation of state GHG reduction strategies identified in the 2022 Scoping Plan, including smart growth, transportation electrification, building efficiency, and reduction of high-GWP emissions; and be consistent with applicable Garden Grove General Plan goals and policies that provide GHG-reduction co-benefits related to air quality, conservation, circulation, and climate resilience. The analysis demonstrates that, as mitigated, the Project would have a less than significant impact because the Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

C. Effects Found to Be Significant and Unavoidable

CEQA Guidelines Section 15126.2(b) requires that an EIR describe any significant impacts that cannot be avoided, including those impacts that can be mitigated but not reduced to a less-than-significant level. As discussed in the Final EIR, implementation of the Project would result in significant impacts that cannot feasibly be mitigated below a level of significance with respect to threshold of significance GHG-1.

1. Greenhouse Gas Emissions

Threshold of Significance

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

Mitigation Measures

The Supplemental MMRP imposes MM-GHG-1 through MM-GHG-14 as feasible mitigation measures, as well as PDFs 4, 5, 8, 10, 11, 12, 21, 27, 28, and 29, all of which would reduce the Project's impacts under significance threshold GHG-2 to less than significant. The Final SEIR discloses that those measures, while feasible and adopted, would not reduce the Project's impacts under significant threshold GHG-1 to a less than significant level. The Final SEIR also identified MM-GHG-15 as a potential mitigation measure that, if feasible, would reduce the Project's potential GHG impacts under threshold GHG-1 to less than significant. As discussed in the Final SEIR and demonstrated below, MM-GHG-15 imposes an obligation on the Project to acquire carbon offset credits.

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_{2e} per year threshold, consistent with the quantification, performance standards and requirements set forth below. Alternatively, the Project Applicant or its designee may purchase and retire annual operational GHG offsets for a period of 30 years by December 31 of the year preceding each new year after the issuance of the final certificate of occupancy. Annual operational GHG emission offsets shall also be subject to the same quantification, performance standards, and requirements set forth below.

Quantification of GHG Emissions and Reductions Required

Construction

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

Year	Offsets Required (MT CO _{2e})	Purchase and Retirement Deadline
1	402.52	Prior to issuance of grading permits
2	1,434.02	December 31 of Year 1
3	1,410.81	December 31 of Year 2
4	114.95	December 31 of Year 3
Total	3,362.30	N/A

Notes: MT CO_{2e} = metric tons of carbon dioxide equivalent; N/A = not applicable.

Operation

The estimated operational emissions are 7,408.02 MT CO_{2e}. To mitigate operational emissions below the 1,400 MT CO_{2e} per year threshold, the Project would purchase and retire one lump sum of 180,270.60 MT CO_{2e} of offsets (7,408.02 MT CO_{2e} – 6,009.02 [offsets] = 1,399 MT CO_{2e}

remaining); $6,009.02 \text{ MT CO}_2\text{e} \times 30\text{-year life} = 180,270.60 \text{ MT CO}_2\text{e}$; 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.

Scenario	Offsets Required (MT CO ₂ 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 31 of preceding year.

Note: MT CO₂e = 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*¹ (April 2024) and *Climate Forward Program Manual*² (December 2021); the American Carbon Registry's *The ACR Standard, Requirements and Specifications for the Quantification, Monitoring, Reporting, Verification, and Registration of Project-Based GHG Emissions Reductions and Removals*³ (July 2023); and Verra's VCS Standard, *Program Guide*⁴ (August 2023), and *Methodology Requirements*⁵ (October 2023).

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

The carbon offsets purchased to satisfy this measure must represent the reduction or sequestration of one MT CO_{2e} that is “not otherwise required” (CEQA Guidelines Section 15126.4[c][3]). The carbon offsets must achieve the standard of additional, real, permanent, quantifiable, verifiable, and enforceable reductions, which are defined for purposes of this mitigation measure as follows consistent with the applicable provisions in the California Code of Regulations, Title 17:

1. “Additional” means that the carbon offset is not otherwise required by law or regulation, and not any other GHG emissions reduction that otherwise would occur.
2. “Real” means that the GHG reduction underlying the carbon offset results from a demonstrable action or set of actions, and is quantified under the protocol or methodology using appropriate, accurate, and conservative methodologies that account for all GHG emissions sources and sinks within the boundary of the applicable carbon offset project, uncertainty, and the potential for activity-shifting leakage and market-shifting leakage.
3. “Verifiable” means that the GHG reduction underlying the carbon offset is well documented, transparent, and 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

¹ <https://climateactionreserve.org/wp-content/uploads/2024/04/Reserve-Program-Manual-v9.2.pdf>.

² https://climateforward.org/wp-content/uploads/2021/12/Climate-Forward-Program-Manual-December-2021_12-FINAL.pdf.

³ <https://acrcarbon.org/wp-content/uploads/2023/10/ACR-Standard-v8.0.pdf>.

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

⁵ <https://verra.org/documents/vcs-methodology-requirements-v4-4/>.

and sinks included within the boundary of the carbon offset project, while accounting for uncertainty and leakage.

6. “Enforceable” means that the implementation of the GHG reduction activity must represent the legally binding commitment of the offset project developer to undertake and carry it out.

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

Carbon offsets secured from the CARB-accredited registries shall be prioritized in accordance with the following criteria: (1) offsets within the City; (2) offsets within the County, only if in-City offsets are unavailable; (3) offsets within the State of California, only if in-county offsets are unavailable; (3) offsets within the United States, only if in-state offsets are unavailable.⁶

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

Monitoring, Reporting, and Enforcement Standards

Prior to the timeline identified in the initial section of this mitigation measure, the Project Applicant or its designee shall submit documentation in the form of a report to the City that identifies the quantity of emission reductions required by this mitigation measure, as well as the carbon offset proposed for acquisition to achieve compliance with this measure. For purposes of demonstrating that each offset is additional, real, permanent, quantifiable, verifiable and enforceable, the reports shall include: (i) the applicable protocol(s) and methodologies associated with the carbon 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

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

broker that identifies the carbon registry listings reviewed for carbon offset availability, including the related date of inquiry.

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

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

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

Finding

Specific economic, legal, social, technological, or other considerations make infeasible the MM-GHG-15 identified in the Final SEIR. Therefore, notwithstanding the imposition of MM-GHG-1 through MM-GHG-15, the PDFs and MM-TRA-1 and MM-TRA-2, the Project's impact under significance threshold GHG-1 is considered significant and unavoidable.

Facts in Support of Finding

Consistent with significance threshold GHG-1, Final SEIR Section 4.1 and the related technical appendix evaluated whether the Project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. The Final SEIR discloses and discusses the regulatory, scientific and factual environmental setting relative to GHG emissions, including, without limitations, the science behind climate change, the sources of GHG emissions, potential effects of climate change, and applicable federal, state, regional, and local plans, policies, and regulations. As required by CEQA Guidelines Section 15064.4(a), the City made a "good faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of" GHG emissions

resulting from the Project. Consistent with that provision, the Final SEIR quantifies the Project's expected construction and operational GHG emissions.

CEQA Guidelines section 15064.7 provides that a lead agency like the City, "[w]hen adopting or using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence." As the Final SEIR discusses and discloses, the City used a conservative methodology that is based on the methodology developed by the South Coast Air Quality Management District ("SCAQMD"), the air quality district for the area where the Project is located. Exercising its discretion as a lead agency, although a 3,000 metric tons of carbon dioxide equivalent (MTCO_{2e}) per year threshold was recommended by the SCAQMD methodology for all non-industrial projects, the Final SEIR conservatively utilized the SCAQMD developed Tier 3 threshold of 1,400 MTCO_{2e} per year for commercial projects for the Project. The Final SEIR's conservative methodology applies the lowest numeric GHG emissions significance threshold identified by the SCAQMD guidance documents.

For purposes of disclosing the potentially significant GHG impacts under significance threshold GHG-1, the Final SEIR methodology involved the use of CalEEMod to calculate the annual GHG emissions based on the Project's construction and operations. The SEIR describes factors and Project features relevant to the calculation of emissions including, without limitations, the number of hotel rooms, the number of parking spaces, VMT estimates identified in the Final SEIR VMT analysis, a worst-case construction timeline, and Project amenities only being available to registered hotel guests. Operational emission estimates considered different Project sources of GHG emissions, including mobile, area, energy, water, wastewater, solid waste, refrigerants and stationary sources.

The unmitigated annual operational emissions plus amortized construction emissions totaled 8,124.48 MTCO_{2e} which exceeds the 1,400 MTCO_{2e} numerical significance threshold utilized by the City. Using CalEEMod and other information disclosed in the SEIR, the SEIR analyzed and disclosed the Project's GHG emissions with implementation of the identified mitigation measures and PDFs. That analysis identifies whether, under CalEEMod and other applicable guidance, a particular mitigation measure or PDF results in a quantifiable emission reduction or a qualitative benefit for purposes of the quantification of the Project's mitigated GHG emissions. The Final SEIR includes an explanation of reasons for characterizing a particular mitigation measure or PDF as qualitative in nature. The analysis of mitigated emissions without imposition of MM-GHG-15 shows that Project emissions would remain above the 1,400 MTCO_{2e} significance threshold. The mitigated annual operational emissions without MM-GHG-15 plus amortized construction emissions totaled 7,520.09 MTCO_{2e}. Thus, the combination of the Supplemental MMRP imposing as binding, on-site obligations in the form of MM-GHG-1 through MM-GHG-14, MM-VMT-1 and MM-VMT-2 as well as the applicable PDFs, are insufficient to reduce the Project's GHG emissions below the 1,400 MTCO_{2e} significance threshold.

Given that the Project would still exceed the significance threshold despite imposition of the mitigation measures and PDFs other than MM-GHG-15, the City also included MM-GHG-15 as a mitigation measure. The Final SEIR explains that carbon offset credits as mitigation was considered and incorporated following implementation of all feasible construction and operational (on-site) mitigation measures. The Draft 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.

The Final SEIR clarifies that CEQA does not require a lead agency to adopt every potentially applicable GHG reduction measure identified in guidance documents, including the California Air Pollution Control Officers Association (CAPCOA) Quantifying Greenhouse Gas Mitigation Measures report. CAPCOA expressly recognizes that its measures are not prescriptive, are not universally feasible for all projects, and are intended to serve as a menu of potential strategies that must be evaluated considering project-specific constraints. The City determined, and the record supports, that the Project incorporated all CAPCOA-type measures that were feasible and effective for this Project. As noted in the Final EIR, CEQA does not require inclusion of any CAPCOA measures for a GHG analysis. 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. The Project's PDFs and mitigation measures do not repeat 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.

The Final SEIR further explains that CEQA does not require rejection or exhaustion of every conceivable alternative mitigation approach before a lead agency may rely on carbon offset credits. Rather, CEQA requires the adoption of all feasible mitigation measures that would substantially lessen a significant impact. This approach is consistent with CEQA Guidelines sections 15021 and 15091, as well as with statewide and regional agency guidance.

The incorporation of carbon offset credits as mitigation is consistent with Tier 5 of the SCAQMD guidance and other CEQA guidance which includes implementation of a program of purchasing GHG offset credits. Specifically, the use of carbon offsets as a CEQA mitigation strategy for the reduction of GHG emissions was memorialized with the Senate Bill 97-directed amendments to the CEQA Guidelines, as adopted by Office of Planning and Research (now Office of Land Use and Climate Innovation) and the California Natural Resources Agency circa 2009. The use of offsite actions and credits, such as carbon offsets, to mitigate GHG impacts are based on the following:

- CEQA Section 15126.4 (c)(3) states that mitigation measures for GHG emissions may include “offsite measures, including offsets that are not otherwise required, to mitigate a project’s emissions”
- CEQA Section 151370 (e) states that mitigation includes “Compensating for the impact by replacing or providing substitute resources or environments”
- 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.”

The adopted MM-GHG-15 requires the purchase and retirement of carbon offset credits from one of 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. MM-GHG-15 requires the acquisition and retirement of the quantity of credits needed to reduce operational GHG emissions plus amortized construction emissions to below the 1,400 MT CO₂e significance threshold for the life of the Project (30 years). The City has determined that a 30-year project life is appropriate for the measure and presents the reasonable limits of scientific and evidentiary data for the Project, given current modeling tools, the changing

regulatory structure, the level of unknowns beyond 2050 with respect to regulatory programs mandating further reductions in GHG emissions, and other available information. MM-GHG-15 also details the performance standard, a locational hierarchy for carbon offset credits, and the specific requirements and procedures the City and Project owner must use to purchase and retire qualifying carbon offset credits. As expressly addressed in MM-GHG-15, and the record of Project proceedings reflect, the identified carbon offset credits qualify as additional, real, permanent, quantifiable, verifiable and enforceable.

Notwithstanding that the analysis demonstrates that the acquisition and retirement of qualifying carbon offset credits, as one of the range of measures imposed by the Supplemental MMRP, would reduce the Project's total GHG emissions below the GHG-1 significance threshold, the SEIR conservatively discloses that Project impacts would be treated as significant and unavoidable. As explained in the California Air Resources Board's 2023 white paper on carbon offset integrity and durability,⁷ other jurisdictions have utilized carbon offset credits as feasible mitigation sufficient to reduce project impacts to less than significance. Various air quality management districts have also created policies or identified practices that recognize carbon offset credits as part of a menu of options to feasibly reduce the potentially significant GHG impacts of projects.

The City's significance determination recognizes the potential viability of GHG offset credits as a means of reducing to less than significant the Project's GHG impacts under significance threshold GHG-1. The City's determination also recognizes that technical, legal, political, economic and other forms of uncertainty exist as to whether a sufficient supply of qualifying carbon offset credits will exist for the 30 year life of the Project that would result in actual, quantifiable, and enforceable reductions of the Project-generated operational and construction GHG below the 1,400 MT CO_{2e} significance threshold. This determination of uncertainty applies to all carbon offset credit programs and is not specific to the carbon offset credit methodology and procedures identified in the Final SEIR. The MM-GHG-15 methodology and process are consistent with the approach to GHG mitigation used by other jurisdictions to satisfy CEQA's requirements. The determination of CEQA infeasibility also recognizes that qualifying offset projects may be subject to reversal, market variability, regulatory changes, or conditions beyond the control of the lead agency and Project owner that create doubt about the ability of MM-GHG-15 to sufficiently reduce Project impacts to a less than significant level. The City also adopts this infeasibility finding because uncertainty exists as to the long-term effectiveness of verification standards and monitoring.

For those and other reasons identified in the record of proceedings for the Project, the City concludes that, notwithstanding the imposition of MM-GHG-1 through MM-GHG-15, MM-TRA-1 and MM-TRA-2 and PDFs such as 4, 5, 8, 10, 11, 12, 21 27, 28, and 29, the Project's GHG emissions impacts under the GHG-1 threshold may remain significant and unavoidable.

Cumulative Greenhouse Gas Emissions Impacts

Global climate change is a cumulative impact by nature. A project participates in this potential impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. GHG emissions inherently contribute to cumulative impacts; therefore, any additional GHG emissions would result in a cumulative impact. The project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment or conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Therefore, the Project would result in a cumulatively considerable contribution to a

⁷ CARB and California EPA (California Air Resources Board and California Environmental Protection Agency). 2023. "Local CEQA Mitigation Best Practices and Lessons Learned." Contract No. 21STC001. Prepared by M.R. Boswell. September 30, 2023. <https://ww2.arb.ca.gov/sites/default/files/2023-11/CARB%2021STC001%20White%20Paper.pdf>.

cumulative impact with regard to the generation of GHG emissions, and the cumulative impact would be significant and unavoidable despite the implementation of MM-GHG-1 through MM-GHG-15, MM-TRA-1, MM-TRA-2, and PDFs including 4, 5, 8, 10, 11, 12, 21, 27, 28, and 29.

D. Alternatives

CEQA Guidelines Section 15126.6(a) requires that an EIR “describe a range of reasonable alternatives to the proposed project, or to the location of the project, that would feasibly attain most of the basic objectives but would avoid or substantially lessen any of the significant environmental effects of the project, and evaluate the comparative merits of the alternatives.” Section 15126.6(a) also provides that an EIR need not consider every conceivable alternative to a project; rather, an EIR must consider a reasonable range of alternatives that would foster informed decision-making and public participation. Accordingly, the Final SEIR presented a reasonable range of two alternatives listed below, and considered and rejected six potential alternatives.

1. Alternatives Considered but Rejected

The Final SEIR evaluated the following six alternatives that were considered during the SEIR preparation process but not carried forward for further analysis consistent with CEQA Guidelines Section 15126.6(c):

a) Alternative Site

Development of the project on an alternative site was not carried forward for more detailed consideration. The Alternative Site was considered but rejected because a review of available vacant parcels similar in size and in the vicinity of the project site was conducted. Finding an alternative vacant parcel in the project vicinity was important because of proximity to Disneyland and the Anaheim Convention Center, which both attract overnight guests and a need for hotel rooms in the general Project vicinity. The only other potential site in the general project vicinity resulting from that review was immediately east of the Project site. It was determined that the alternative site would not reduce, avoid or substantially lessen any Project impacts. Additionally, the alternative site is not owned by the City or Project applicant and the ability to acquire the site was unknown. In accordance with CEQA Guidelines Section 15126.6(f)(2), an EIR is only required to consider an alternative location if the project’s potentially significant project effects would be avoided or substantially lessened by moving the project to another site. An alternative site would not have avoided or substantially lessened any identified Project impacts.

As the Final SEIR analyzes a reasonable range of alternatives, CEQA does not require full consideration of the Alternative Site Alternative when it is speculative whether such a feasible site exists that could accommodate the project and meet most project objectives, the applicant could feasibly acquire such a site if one existed and the project’s potentially significant impacts would be avoided or substantially lessened at such a site.

b) Hotel-Only Alternative

The City considered an alternative that would result in the construction and operation of a hotel only, without the inclusion of the waterpark and additional resort amenities associated with the Project. The hotel-only alternative was not carried forward for more detailed consideration as the alternative would not substantially reduce the Project

impacts, including those related to VMT and GHG emissions. Additionally, the hotel-only alternative would not achieve many of the Project objectives, including the following:

- Develop a destination hotel that incorporates sustainability features such as on-site solar energy, lower water use appliances and energy saving fixtures on a property within a transit priority area.
- Provide for enhanced overnight guest experiences with themed amenities attractive to families and other visitors who will use the project as a tourist destination location in and of itself.
- Develop a facility of sufficient size and with sufficient amenities to attract a partnership with a national or international theme park franchise.

As the Final SEIR analyzes a reasonable range of alternatives, and the hotel-only approach would not satisfy the CEQA criteria for a feasible alternative for the reasons specified above and in the Final SEIR, CEQA does not require full consideration of the Hotel Only Alternative.

c) Resort-Only Alternative

The City considered an alternative that would result in the construction and operation of a resort on the Project site that does not include the accompanying hotel component. The resort-only alternative was not carried forward for more detailed consideration. This alternative would increase the number of vehicle trips associated with VMT because people would be traveling to and from the Project site on the same day, without staying the night. The increase in vehicle trips associated with VMT would lead to increased GHG emissions when compared with the proposed Project. As such, the increase in the number of vehicle trips associated with VMT, and GHG emissions associated with the resort-only alternative would not avoid or substantially lessen the Project's potential significant impacts. Furthermore, this alternative would not achieve the following Project objectives:

- Develop a destination hotel that incorporates sustainability features such as on-site solar energy, lower water use appliances and energy saving fixtures on a property within a transit priority area.
- Provide for enhanced overnight guest experiences with themed amenities attractive to families and other visitors who will use the project as a tourist destination location in and of itself.
- Implement the Project site's International West Mixed Use General Plan designation by including hotel, entertainment and resort elements to promote guest visits of multiple days.
- Develop a destination hotel in a location with convenient access to public transit and a shuttle system that connects the project to other tourist attractions in the area including those along the Harbor Boulevard Resort corridor.
- Generate a material amount of transient occupancy and property tax revenue for the City.

As the Final SEIR analyzes a reasonable range of alternatives, and the resort-only approach would not satisfy the CEQA criteria for a feasible alternative for the reasons specified above and in the Final SEIR, CEQA does not require full consideration of the Resort Only Alternative.

d) Residential Alternative

The City considered an alternative that would result in the construction and operation of a residential development on the Project site instead of the proposed resort hotel. The residential alternative site could result in fewer environmental impacts than the proposed Project relative to GHG emissions and VMT. This is because the Project

site is in proximity to transit and the exclusively residential use would likely not require a development specific VMT analysis as it would “screen out” from a full VMT analysis. The reduction in vehicle trips related to VMT would also lead to a decrease in GHG emissions. However, an exclusively residential alternative would be inconsistent with the General Plan. Further, the Project site is not one of the state-approved Housing Element sites the City identified as necessary to meet its Regional Housing Needs Assessment (RHNA) obligations. The Housing Element identifies many other properties within the City that are potentially available for that purpose. This alternative would not meet the following Project objectives:

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

As the Final SEIR analyzes a reasonable range of alternatives, and the residential-only approach would not satisfy the CEQA criteria for a feasible alternative for the reasons specified above and in the Final SEIR, CEQA does not require full consideration of the Residential Alternative.

e) Commercial Alternative

The City considered an alternative that would result in the construction and operation of a retail commercial development on the Project site. Under this alternative, the Project site would become a retail commercial destination, thereby increasing the potential for vehicle trips associated with VMT, and operational GHG vehicle emissions when compared with the proposed Project. The trip rate and associated VMT for retail commercial destinations is generally higher than that associated with the uses included within the Project. An increase in VMT would also generally result in increased operational GHG vehicle emissions. Additionally, this alternative would not meet the following Project objectives:

- Develop a destination hotel that incorporates sustainability features such as on-site solar energy, lower water use appliances and energy saving fixtures on a property within a transit priority area.
- Provide for enhanced overnight guest experiences with themed amenities attractive to families and other visitors who will use the Project as a tourist destination location in and of itself.
- Implement the Project site’s International West Mixed Use General Plan designation by including hotel, entertainment and resort elements to promote guest visits of multiple days.

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

As the Final SEIR analyzes a reasonable range of alternatives, and the commercial only approach would not satisfy the CEQA criteria for a feasible alternative for the reasons specified above and in the Final SEIR, CEQA does not require full consideration of the Commercial Alternative.

f) Mixed-Use Development Alternative

The City considered an alternative that would result in the construction and operation of a mixture of uses that could include a combination of residential, commercial, retail, and/or hotel. However, the majority of the Project site has a general plan designation of, and is zoned International West, which encourages hotel, entertainment, and resort uses on the Project site. The Project site is also not identified in the state-approved Housing Element as a property required for the City to satisfy its RHNA obligations. Similar, to the residential alternative discussed above, VMT associated with the potential residential component of a mixed-use development would likely be screened out and result in less than significant impacts due to the Project site's proximity to a major transit stop. The other potential components of a mixed-use development alternative, including retail, commercial, and/or hotel, would result in vehicle trips associated with VMT impacts that are similar to or greater than VMT associated with the Project. This would result in operational GHG emissions that are similar to the Project. While the hotel use might partially satisfy portions of some of the Project Objectives, this alternative would not achieve the following Project objectives:

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

As the Final SEIR analyzes a reasonable range of alternatives, and the mixed-use development approach would not satisfy the CEQA criteria for a feasible alternative for the reasons specified above and in the Final SEIR, CEQA does not require full consideration of the Mixed-Use Development Alternative.

2. Reasonable Range of Alternatives

In addition to the alternatives considered but rejected from further consideration as described above, the Final SEIR evaluated a reasonable range of two alternatives for their ability to avoid or substantially lessen the impacts of the project identified in the EIR, as well as consideration of their ability to feasibly attain most of the basic objectives of the project as described in the Final SEIR Chapter 3, Section 3.1, Project Objectives. Public Resources Code Section 21081 provides that if one or more significant impacts will not be avoided or substantially lessened by adopting mitigation measures, the environmentally superior alternatives described in the EIR must be found infeasible if they are not adopted.

The City finds, after due consideration, that the two alternatives considered in the Final SEIR constitute a reasonable range of alternatives as required by CEQA. As set forth in the Final SEIR and below, the City finds as follows with respect to the two alternatives that have not been approved.

a. Alternative 1: No Project Alternative

CEQA Guidelines Section 15126.6(e) requires that an EIR evaluate a “No Project” alternative to allow decision makers to compare the impacts of approving a project with the impacts of not approving that project. Under the No Project Alternative, the project and associated improvements would not be implemented, and the property would remain as disturbed, previously developed property. This alternative does not preclude future development of the property in accordance with the site’s existing land use designations.

Finding

The City finds that Alternative 1, the No Project Alternative, is undesirable and infeasible as it fails to satisfy the Project’s underlying purpose and fails to meet any of the project objectives. Therefore, the No Project Alternative is rejected because specific economic, legal, social, technological or other considerations make the alternative infeasible.

Facts in Support of Finding

The significant impacts to VMT and GHG would be substantially lessened or avoided by the No Project Alternative compared to the Project. As this alternative would eliminate all of the significant impacts identified for the Project, it would qualify as the environmentally superior alternative. However, this alternative would also not meet any of the project objectives. This alternative would leave the site underutilized contrary to the IW General Plan designation. The alternative would not generate any temporary construction or permanent jobs, nor would it generate the tax and impact fee revenue the City has expected from development of the site. Leaving a prime site near public transit undeveloped is inconsistent with the City’s goal of promoting the enhancement of the Harbor Boulevard corridor and the concentration of hotel and resort uses along Harbor Boulevard south of Chapman Street to bolster the City’s attractiveness as a tourist destination. For these reasons and others detailed in the record before the City, the City rejects the No Project Alternative as both undesirable and infeasible from a public policy perspective.

b. Alternative 2: Reduced Project Alternative

CEQA Guidelines Section 15126.6(e)(2) states that if the No Project Alternative is identified as the environmentally superior alternative, then an environmentally superior alternative should be identified among the other alternatives. Alternative 2 is that other environmentally superior alternative. Alternative 2 would reduce impacts to GHG to a less than significant level. Alternative 2 would achieve that result by achieving an 85% reduction in total building square footage, resulting in 75 hotel rooms, and an 85% reduction in recreational water facilities (pool and lazy river) to serve the reduced hotel rooms. Other amenities such as the theater, larger meeting rooms, grand ballroom, arcade, and multiple restaurants would be eliminated due to size constraints imposed by the Reduced Project Alternative. Similarly, with the limited square footage, retail, a single restaurant and other amenities like a spa and fitness facility included within the Project would either be substantially reduced due to size constraints or likely not practical because of the substantially reduced number of guests. As such, the hotel developed under this alternative would be considered a limited-service hotel.

Finding

Besides the No Project Alternative, Alternative 2 is the environmentally superior alternative. While the Reduced Project Alternative would reduce the GHG impacts to a less than significant level, the alternative would not meet or only partially meet most of the Project objectives. The City rejects the alternative as undesirable. Alternative 2: Reduced Project Alternative is also rejected because specific economic, legal, social, technological or other considerations make the alternative infeasible.

Facts in Support of Finding

The significant impacts to GHG would be reduced to less than significant by the Reduced Project Alternative compared to the Project. The Reduced Project Alternative reduces the amount of development to a level where the GHG emissions would be below the established GHG emissions significance threshold the City identified in the Final SEIR. Therefore, the Final SEIR identifies the Reduced Project Alternative as the environmentally superior alternative. The City hereby rejects this alternative as infeasible as the reduced scale of the alternative would not allow it to meet or only partially meet most of the Project objectives including the following:

- Develop a destination hotel that incorporates sustainability features such as on-site solar energy, lower water use appliances and energy saving fixtures on a property within a transit priority area.
- Provide for enhanced overnight guest experiences with themed amenities attractive to families and other visitors who will use the project as a tourist destination location in and of itself.
- Develop a project that allows for efficient operations and logistics.
- Implement the project site's International West Mixed Use General Plan designation by including hotel, entertainment and resort elements to promote guest visits of multiple days.
- Develop a destination hotel in a location with convenient access to public transit and a shuttle system that connects the project to other tourist attractions in the area including those along the Harbor Boulevard Resort corridor.
- Support increased tourism in the City while also complementing other tourist destinations in surrounding communities.
- Generate a material amount of transient occupancy and property tax revenue for the City

- Develop a facility of sufficient size and with sufficient amenities to attract a partnership with a national or international theme park franchise.

According to industry data, theme park branded hotels and hotels with resort level types of amenities, typically range from many hundreds of rooms to more than several thousand, whereas the Reduced Project Alternative provides only 75 rooms. Especially in a more urban context like Garden Grove, where the Project site is relatively small, the above-referenced Project objectives would not be met with such a small number of hotel rooms. This alternative would also not maximize the use of the Project site and would generate less tax and impact fee revenue than the City has expected from development of the site. The Reduced Project Alternative would underutilize one of the larger undeveloped parcels in the City's IW land use designated area that allows a maximum floor area ratio (FAR) of 5.0. The Reduced Project Alternative would result in an FAR of only approximately 0.75 on the 3.72-acre Project site. For these reasons and others detailed in the record before the City, even though it is the environmentally superior alternative, the City rejects the Reduced Project Alternative as undesirable and infeasible for economic, legal, social, technological or other considerations referenced in these findings and the record of Project proceedings.

IX. Other CEQA Considerations

A. Growth-Inducing Impacts

CEQA Guidelines section 15126.2(e) mandates a discussion of the growth-inducing nature of the project evaluated in an EIR. Growth-inducing analysis is intended to address the potential for a project to “foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.” Growth inducement refers to facilitating planned growth or inducing unplanned growth. CEQA Guidelines Section 15126.2(e) provides that it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

Final SEIR section 5.4 addresses the potential for growth inducement due to the Project. In the City, the growth-inducing potential of a project would be considered significant if it stimulates population growth or a population concentration above what is assumed in local and regional land use plans, or in projections made by regional planning authorities, such as the Southern California Association of Governments.

Growth-inducing projects typically occur in isolated, undeveloped, or underdeveloped locations that necessitate extension of major infrastructure such as sewer and water facilities or roadways, or in locations that encourage premature or unplanned growth. The Project is a proposed redevelopment of previously developed, infill properties. Harbor Boulevard is a major commercial road and the General Plan has long contemplated development of the Project site for a hotel resort like the Project. All infrastructure necessary to serve the Project exists at or in the vicinity of the property, and the Project would not extend such facilities to other undeveloped or underdeveloped properties. The Project would not remove obstacles to growth by extending infrastructure to new areas, nor would it result in significant adverse environmental impacts due to the expansion of infrastructure, such as water supply facilities, wastewater treatment plants, roads, or freeways. The Project's utility and infrastructure improvements would not remove obstacles to growth or create additional capacity as they will only be to the property's connection points or for purposes of improvements required for the Project.

The Project requires a PUD for a portion of the Project site that was zoned residential. However, the entirety of the Project site, even the area zoned residential, has long been contemplated for a resort hotel use pursuant to the existing General Plan designation of IW. The IW contemplates a mix of uses, including resort, entertainment and hotel, appropriate for a major entertainment and tourism destination. Employment generated by the Project would likely come from within the City itself and/or surrounding region. Population or employment growth above applicable planning forecasts is not expected as the Project is consistent with the Project sites' existing General Plan designation. According to the Connect SoCal 2024 Demographics and Growth Forecast Technical Report, the City will experience an increase of 4,300 jobs between 2019 and 2035, and an additional increase of 5,500 jobs by 2050. The Project's increase of 446 employees at full buildout would represent approximately 10% of the anticipated increase in the number of jobs within the City by 2035 and approximately 5% of the anticipated increase in the number of jobs within the City by 2050.

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 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 Project also conforms to the state-approved Housing Element as the Project site is not identified as one of the properties required for the City to meet its RHNA projections. Thus, the Project would not be growth-inducing for CEQA purposes as any growth resulting from the Project is within that already contemplated in the applicable local and regional plans. Thus, the Final SEIR satisfies CEQA's requirements with respect to the analysis and disclosure of potential growth-inducing impacts.

B. Significant Irreversible Effects

CEQA Guidelines Section 15126.2(d) requires a discussion of any significant irreversible environmental changes associated with a project. Irreversible effects include large commitment of nonrenewable resources, secondary impacts such as highway improvement that grant access to a previously inaccessible area or irreversible damage from environmental accidents associated with a project. As analyzed in Final SEIR Section 5.3, the Project would not result in significant irreversible environmental changes. The Project is an infill development on previously developed properties in an area where resort hotel development is consistent with the City General Plan designation. The Project does not require any extension of infrastructure to previously inaccessible areas or commit future generations to similar uses. The Project would contribute to or result in irreversible environmental change with respect to the development of the underutilized, presently vacant, property and use of new raw materials such as lumber, metals, and sand, some of which might be finite resources. Construction and operation of the Project would also incrementally reduce non-renewable supplies of fossil fuels and natural gas. However, the nature of the

irreversible environmental change would be relatively small on a local and regional, let alone a national or international scale such that the City finds the change would not be considered significant.

X. Other CEQA Findings

A. Supplemental Mitigation Monitoring and Reporting Program

1. General Finding

Pursuant to Section 21081.6 of the Public Resources Code, the City, in adopting these Findings, also adopts the Supplemental MMRP for the Project. The Supplemental MMRP is designed to ensure that, during project implementation, the City and other responsible parties will comply with the mitigation measures adopted in these Findings. The City hereby binds itself to cause the various mitigation measures and PDFs described in the Supplemental MMRP to be implemented in accordance with the Final SEIR and Supplemental MMRP. The measures identified in the Supplemental MMRP constitute a binding set of obligations upon the City's certification and approvals identified herein.

The City hereby finds that the Supplemental MMRP, which is incorporated into the project conditions of approval, meets the requirements of Public Resources Code Section 21081.6 by providing for the implementation and monitoring of project conditions intended to mitigate the significant environmental effects of the Project.

2. Regulatory Compliance

Federal, state, regional, and local laws contain certain regulatory compliance measures that must be adhered to in implementing the Project. The Final SEIR describes the regulatory setting within each chapter, which includes the details of regulatory compliance measures. Where regulatory compliance measures are required by law, the City has not separately proposed or adopted mitigation requiring regulatory compliance (as it would be declaratory of existing law). Nonetheless, the City finds that the Project must comply with all applicable regulatory compliance measures.

B. Certification of the Final Supplemental Environmental Impact Report, CEQA Guidelines Section 15090

The City Council certifies that the Final SEIR (SCH No. 2022060174) has been completed in compliance with CEQA and the CEQA Guidelines, that the Final SEIR was presented to the City Council, and that the City Council reviewed and considered the information contained therein and in the record of proceedings for the Project before approving the Project, and that the Final SEIR reflects the independent judgment and analysis of the City Council (CEQA Guidelines Section 15090).

XI. Statement of Overriding Considerations

Pursuant to Public Resources Code Section 21081(b) and CEQA Guidelines Section 15093(a) and (b), the City is required to balance, as applicable, the economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the Project. Only if the specific economic, legal, social, technological or other benefits of the Project, including regionwide or statewide environmental benefits, outweigh the Project's unavoidable adverse environmental effects, may the adverse environmental effects be considered "acceptable" (CEQA Guidelines Section 15093[a]). CEQA requires the agency to support, in writing, the specific reasons for considering a project acceptable when significant impacts are not avoided or substantially lessened. Those reasons must be based on substantial evidence in the final EIR or elsewhere in the administrative record (CEQA Guidelines Section 15093[b])

Courts have upheld overriding considerations that were based on a variety of policy considerations including, but not limited to, new jobs, stronger tax base, and implementation of an agency's economic development goals, growth management policies, redevelopment plans, the need for housing and employment, conformity to locally adopted plans, and provision of construction jobs. As disclosed previously, the City's approval of the Project will result in significant and unavoidable adverse impacts with respect to GHG even with the adoption of all feasible mitigation. Under such circumstances, pursuant to Public Resources Code Section 21081(b) and Guidelines Section 15093, the City may only approve the Project if it adopts a statement of overriding considerations.

The City, (i) having independently reviewed the information in the Draft SEIR, Final SEIR and the record of proceedings; (ii) having made a reasonable and good faith effort to eliminate or substantially lessen the significant GHG impacts resulting from the Project to the extent feasible by adopting the mitigation measures identified in the Draft SEIR and Final SEIR; and (iii) having balanced the benefits of the Project against the significant environmental impacts, chooses to approve the Project, despite its significant and unavoidable environmental impacts, because, in its view, specific economic, legal, social, and other benefits of the Project outweigh the significant effects on the environment.

Each of the separate benefits of the Project, as stated herein, is determined to be, unto itself and independent of the other Project benefits, a basis for overriding all unavoidable and significant adverse environmental impacts identified in these Findings.

- **Consistency with the General Plan:** The proposed Project, which is located within the Grove District Anaheim Resort area, would help maintain consistency with and carry out the goals, objectives, and policies of the City General Plan by providing a 500-room hotel resort with substantial on-site amenities such as a lazy river and theater, retail, restaurants and meeting space to implement General Plan Policies such as LU-1.4., LU-9.1, ED-1, ED-1.1, and implementation measures such as LU-IMP-9A. By maintaining consistency with and implementing the goals, objectives, and policies of the City's General Plan, the proposed Project will provide opportunities for the development of tourism-related businesses, promote the enhancement of the Harbor Boulevard corridor, and add to the concentration of hotel and resort uses along Harbor Boulevard, south of Chapman Street, further bolstering the City's attractiveness as a tourist destination.

- **Consistency with the International West Mixed Use (IW) General Plan Designation:** The proposed Project would develop a hotel resort facility on a previously developed, but currently vacant property within the International West Mixed Use (IW) General Plan designated area. More commonly referred to as International West, the IW General Plan land use designation is intended to function as the City's resort area and was established to provide resort, entertainment, retail, and hotel uses appropriate for a major entertainment and tourism destination. The proposed Project provides the IW General Plan designated area with the exact type of development it was intended to foster. The proposed Project would be consistent with the IW General Plan designation.
- **Preserves Housing:** The proposed Project preserves properties designated in the adopted Housing Element to meet the City's RHNA for residential use by locating the Project's hotel and tourist-oriented development on a property identified by the IW General Plan designation. As previously mentioned, the IW General Plan designation is specifically intended to provide for a mix of uses, including resort, entertainment, retail, and hotel opportunities appropriate for a major entertainment and tourism destination. The proposed Project's location within the IW General Plan designation will provide the area with new hospitality, entertainment, resort and retail opportunities while preserving properties designated for residential use that exist elsewhere in the City. While the Project site allows for housing, it is not identified in the Housing Element Sites 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 RHNA. The project would not minimize the City's ability to meet its RHNA.
- **Substantial Increase in Public Revenue and Economic Activity for the City and Surrounding Region:** In 2022, Tierra West Advisors, Inc. was retained by the City to prepare an Economic Development Report & Analysis (hereafter the "Economic Report") that analyzed the economic impact of the proposed Project on the City and the broader region using financial information available at the time (City of Garden Grove Economic Development Report & Analysis, August 28, 2022). This Economic Report has since been updated to provide refreshed and adjusted financial projections based on current financial information, assumptions and market conditions (hereafter the "Updated Economic Report") (City of Garden Grove Updated Economic Development Report & Analysis, April 2026). These combined analyses show that the construction and operation of the proposed Project will result in a substantial increase in public revenue and economic activity for the City and the surrounding region. Over the course of thirty (30) years, the proposed Project is estimated to generate approximately \$416.2 million in combined tax revenue to the City, of which approximately \$323.2 million will be net revenue retained by the City over the course of that time (Updated Economic Report, p. 11). The \$323.2 million in net public revenue to the City will come in the form of new net transient occupancy tax revenue (projected at \$243.2 million in total), sales tax revenue (projected at \$68.6 million in total), and Project property tax revenue (projected at \$11.5 million annually starting in 2028 and steadily increasing through Project completion) resulting from the proposed Project. (Updated Economic Report, p. 11). Importantly, this projected public revenue is not currently being generated by the vacant site as it exists today and will only materialize after the completion of the proposed Project (Economic Report, p. 7). Moreover, the economic output of the proposed Project for the City is significant. The Project is anticipated to generate approximately \$4.575 billion in direct, indirect, and induced economic output within the City over the course of the 30-year Development Agreement (Updated Economic Report, p. 8). Additionally, the City estimates that the total estimated direct economic output of the Project will exceed \$2.125 billion as a result of expenditures at the Project site and other spin-off sales within the City limits over the 30 years (Updated Economic Report, pp. 8-9). The Project's proximity to other major tourist attractions in the City and surrounding area including Disneyland and the Anaheim Convention Center will also provide the region with increased economic activity and tax revenue. The combined

economic impact of these recurring revenue sources will provide a stable, long-term funding source to support essential municipal services including public safety, parks and recreation, public works, and community development programs that benefit all City residents.

- **Reduce Vehicle Miles Traveled:** The proposed Project's location near public transit hubs along Harbor Boulevard implements state and local goals for reductions in vehicle miles traveled. The Project's close proximity to other major tourist attractions in the City and surrounding area including Disneyland and the Anaheim Convention Center will provide opportunities for employees and guests to use public transit or active non-motorized transportation, such as walking and bicycling, to get to and from their destinations, thereby reducing reliance on personal automobiles.
- **Promote Sustainability:** The proposed Project would promote sustainability by encouraging growth in a manner that encourages green buildings and complies with federal, state, and local environmental rules and regulations. The Project will promote the City's sustainability goals, including General Plan goals CON-4 and CON-5, by incorporating project design features or mitigation measures including on-site solar energy facilities projected to generate approximately 267,000 kilowatt hours (kWh) per year, cool roofs and decks, electrical vehicle charging infrastructure and enhanced water conservation measures.
- **Provides Employment Opportunities to the Local Community:** The proposed Project is expected to provide for a substantial increase in temporary construction and longer-term full-time operational jobs for the City. The proposed Project is expected to provide employment opportunities for a highly skilled workforce, especially opportunities within the trades and construction industries during the construction phase of the Project, with the projected creation of a number of temporary construction jobs, including vendors and haul truckers (Updated Economic Report, p. 9). In addition, the proposed Project is projected to create 380 full-time equivalent operational jobs including management, front desk and concierge, and housekeeping staff (Updated Economic Report, p. 9). Moreover, the proposed Project is expected to ignite other employment opportunities within the City and broader region, leading to a multiplier effect that is anticipated to create an additional 1,790 jobs in the local community and region consistent with SCAG and regional growth projections (Updated Economic Report, p. 11).

A. Conclusion

The City of Garden Grove has balanced the Project's benefits against the Project's significant unavoidable impacts. The City Council finds that the proposed Project's benefits outweigh the Project's significant unavoidable impacts, and that these impacts, therefore, are considered acceptable in light of the Project's benefits. The City Council finds that each of the benefits described above is an overriding consideration, independent of the other benefits, which warrants approval of the Project notwithstanding the Project's significant unavoidable impacts.

Attachment A

Supplemental Mitigation Monitoring and Reporting Program

Supplemental Mitigation Monitoring and Reporting Program

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.

2 Supplemental MMRP Table

Table 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 1. Supplemental Mitigation Monitoring and Reporting Program

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
Greenhouse Gas Emissions				
Mitigation Measures				
<p>MM-GHG-1: Construction Equipment Electrification. 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> <ul style="list-style-type: none"> (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>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. <i>(CAPCOA Measure C-1-A)</i></p>	Prior to the issuance of building permits	City of Garden Grove		
<p>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.</p>	Prior to the issuance of building permits	City of Garden Grove		
<p>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 including but not limited to wood, metal, concrete, asphalt, and other reusable materials generated during construction activities. The contractor shall implement the</p>	Prior to the start of construction	City of Garden Grove		

Table 1. Supplemental Mitigation Monitoring and Reporting Program

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
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. <i>(CAPCOA Measure S-4)</i>				
MM-GHG-4: Electric Vehicle Charging Infrastructure. Prior to issuance of building permits, the Project Applicant or designee shall submit a site plan to the City of Garden Grove for approval noting the location of electric vehicle infrastructure and charging stations. Prior to issuance of the final certificate of occupancy, the Project Applicant or designee shall provide electric vehicle (EV) charging infrastructure within the Project site as required by the applicable California Green Building Standards Code, but that, at a minimum, meets or exceeds 2022 California Green Building Standards Code Tier 2 standards. Tier 2 requires approximately 225 parking spaces to be EV capable, and 75 spaces to be equipped with EV Supply Equipment (EVSE). The Project shall install a minimum of 225 EV capable spaces and 100 EVSE spaces. <i>(CAPCOA Measure T-14)</i>	Prior to the issuance of building permits	City of Garden Grove		
MM-GHG-5: Guest Vehicle Trip Reductions. Prior to issuance of building permits, the Project Applicant shall submit a site plan to the City of Garden Grove for approval identifying where pedestrian and bicycle connections to adjacent facilities will be provided and where bicycle parking spaces will be provided. The City shall verify the inclusion of pedestrian and bicycle infrastructure prior to the issuance of the final certificate of occupancy. The Project Applicant or designee shall ensure that, at a minimum, the following trip reduction measures are implemented during Project operations to reduce the number of auto-based trips generated by the Project and to encourage the use of transit, bicycling, and walking. <ul style="list-style-type: none"> ▪ 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. 	Prior to the issuance of a building permits	City of Garden Grove		

Table 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"> ▪ 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 local bus routes and schedules, as well as wayfinding to the existing transit stops 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. <p><i>(CAPCOA Measures T-34, T-38, T-43, and T-44)</i></p>				
<p>MM-GHG-6: Limit Large Diesel Trucks During Operation. Prior to issuance of certificate of occupancy, the Project Applicant or designee shall submit a Truck Delivery Management Plan to the City of Garden Grove that documents how truck deliveries will be restricted and monitored. The Project Applicant or designee shall implement a monitoring program to restrict the number of large diesel trucks coming to the site (i.e. for deliveries, trash collection, or other services) to an average of 10 trucks per day or less. This restriction is specifically applicable to trucks classified as medium-heavy duty and heavy-heavy duty with gross vehicle weight (GVW)</p>	<p>Prior to the issuance of a certificate of occupancy</p>	<p>City of Garden Grove</p>		

Table 1. Supplemental Mitigation Monitoring and Reporting Program

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
<p>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)</p>				
<p>MM-GHG-7: Building Energy Efficiency Measures. Prior to issuance of building permits, the Project Applicant or designee shall submit documentation of building energy efficiency measures to the City of Garden Grove, 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"> 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: <ol style="list-style-type: none"> 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. b. Smart thermostats, which include a motion sensor detector and door/window open sensors, will be installed in each guest room. c. The central plant will utilize a Combination Plant with SmartPlate EV 4. Glazing – All glazing for the tower and exterior public spaces shall be installed with Low-E glass [U-factor (thermal transmittance) ≤ 0.28 and Solar Heat Gain Coefficient (SHGC) ≤ 0.23. 5. Energy Management System – The Project shall use advanced systems to monitor and optimize energy use in real time. 6. Benchmarking and Monitoring – The Project shall incorporate an Energy Star Portfolio Management system to track and manage energy consumption 7. Third-Party Verification/LEED Certification – The Project shall obtain third-party HVAC commissioning verification or LEED certification of Gold to Platinum to verify energy savings. 	<p>Prior to the issuance of building permits</p>	<p>City of Garden Grove</p>		

Table 1. Supplemental Mitigation Monitoring and Reporting Program

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
<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.</p> <p><i>(CAPCOA Measure E-1 is quantified) (CAPCOA Measures E-7, E-9, E-22, E-24, and E25 are qualitative)</i></p>				
<p>MM-GHG-8: Cool Roof/Deck. Prior to issuance of building permits, the Project Applicant or designee shall submit plans to the City for approval that require cool roof and cool deck surfaces to be included as part of the Project for the podium and tower, consistent with the specifications provided below.</p> <ul style="list-style-type: none"> ▪ Cool Roof Installation: <p>All roofing materials shall meet or exceed the California Title 24, Part 6 requirements for cool roofs, based on roof slope:</p> <ul style="list-style-type: none"> ▪ Low-sloped roofs (\leq 2:12 pitch): <ul style="list-style-type: none"> - 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): <ul style="list-style-type: none"> - Aged SR \geq 0.20 - TE \geq 0.75 - Or SRI \geq 16 ▪ Cool Deck Surfaces: <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"> - 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 	<p>Prior to the issuance of building permits</p>	<p>City of Garden Grove</p>		

Table 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 the above standards, the Project Applicant may implement one or more of the following:</p> <ul style="list-style-type: none"> ▪ 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). <p>Monitoring and Reporting shall include:</p> <ul style="list-style-type: none"> ▪ 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. <p><i>(CAPCOA Measure E-21)</i></p>				
<p>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. <i>(CAPCOA Measure E-10-B)</i></p>	<p>Prior to the issuance of a certificate of occupancy</p>	<p>City of Garden Grove</p>		
<p>MM-GHG-10: Water Conservation. Prior to receiving the final certificate of occupancy, the Project Applicant or designee shall submit a Water Conservation Compliance Report to the City of Garden Grove for review and approval. The Project shall achieve a minimum 10% reduction in total water use compared to the baseline of 167 gallons per room per day as identified in the Water Supply Assessment (Psomas 2022). This equates to a target of no more than 150.3 GPCD at full occupancy. The Water Conservation Compliance Report shall include product specifications for all water-saving fixtures and systems, landscape and irrigation plans, greywater system design and capacity documentation, post-occupancy water use monitoring</p>	<p>Prior to receiving the final certificate of occupancy</p>	<p>City of Garden Grove</p>		

Table 1. Supplemental Mitigation Monitoring and Reporting Program

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
<p>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"> ▪ 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 <p><i>(CAPCOA Measures W-2, W-5, and W-7)</i></p>				
<p>MM-GHG-11: Waste Reduction. Prior to issuance of the final certificate of occupancy, the Project Applicant or designee shall submit a Waste Management, Recycling, and Composting Plan to the City of Garden Grove for review and approval. The program shall be implemented on-site at the Project location and apply to all operational areas, including guest services, food and beverage operations, maintenance, and administrative functions. The waste reduction program shall be fully implemented during Project operations. The Plan shall specify a minimum diversion of 25% of municipal solid waste, 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"> ▪ Recycling Program <ul style="list-style-type: none"> - Provide labeled bins for recyclables and certified hauler contracts. - Promote recycled paper and other products like soap. ▪ Organics and Composting Program <ul style="list-style-type: none"> - Collect food scraps and compostables. ▪ Source Reduction Measures <ul style="list-style-type: none"> - 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. 	<p>Prior to issuance of the final certificate of occupancy</p>	<p>City of Garden Grove</p>		

Table 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"> - 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 <ul style="list-style-type: none"> - Provide staff training and signage for guests. ▪ Monitoring and Reporting <ul style="list-style-type: none"> - Track waste and submit Annual Waste Diversion Report to the City of Garden Grove. <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>				

Table 1. Supplemental Mitigation Monitoring and Reporting Program

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
<p>MM-GHG-12: Zero Emission Landscape Equipment. During Project operations, the Project Applicant or designee shall ensure zero-emission landscape equipment (defined as equipment that does not emit tailpipe emissions during operation) is utilized. The Project Applicant or designee shall be responsible for ensuring that all landscape maintenance contractors and staff comply with this measure. All landscape maintenance activities associated with the Project shall utilize zero-emission landscaping equipment, such as electric-powered or battery-operated tools. This requirement applies to all landscaped areas within the Project site, including but not limited to courtyards, green spaces, perimeter landscaping, and rooftop gardens. The requirement shall be implemented prior to the commencement of landscape maintenance operations. To meet or exceed the performance standard, the Project may implement a combination of the following strategies:</p> <p>Electric-Powered Equipment</p> <ul style="list-style-type: none"> ▪ Use electric or battery-powered: <ul style="list-style-type: none"> - Leaf blowers. - Lawn mowers. - Hedge trimmers. - Edgers. - Chainsaws. <p>Contractor Requirements</p> <ul style="list-style-type: none"> ▪ Include zero-emission equipment requirements in all landscape maintenance contracts. ▪ Require contractors to provide documentation of equipment type and compliance. <p>On-Site Charging Infrastructure</p> <ul style="list-style-type: none"> ▪ Install dedicated charging stations or outlets for landscape equipment. <p>Equipment Inventory and Tracking</p> <ul style="list-style-type: none"> ▪ 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. 	<p>During operations</p>	<p>City of Garden Grove</p>		

Table 1. Supplemental Mitigation Monitoring and Reporting Program

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
<p>Training and Education</p> <ul style="list-style-type: none"> ▪ 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. <p>(CAPCOA Measure LL-1)</p>				
<p>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.</p>	Prior to the issuance of building permits	City of Garden Grove		
<p>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:</p> <ul style="list-style-type: none"> ▪ 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. 	Prior to the issuance of mechanical permits	City of Garden Grove		

Table 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>Mechanical Equipment</p> <ul style="list-style-type: none"> Install microchannel heat exchangers in A/C equipment in place of conventional heat exchangers. <p>Use of Low-GWP Refrigerants</p> <ul style="list-style-type: none"> Select refrigerants such as R-32, R-454B, or other CARB-compliant alternatives with GWP ≤ 750. Avoid high-GWP refrigerants such as R-410A and R-404A. <p>Leak Detection and Prevention</p> <ul style="list-style-type: none"> Install automatic leak detection systems for large-capacity systems. Conduct quarterly inspections and maintain leak logs. <p>Refrigerant Recovery and Disposal</p> <ul style="list-style-type: none"> Use certified technicians for refrigerant recovery and disposal. Maintain documentation of recovered and recycled refrigerants. <p>Preventive Maintenance Program</p> <ul style="list-style-type: none"> Implement a scheduled maintenance plan to inspect and service HVAC and refrigeration systems. Include refrigerant charge optimization and system performance checks. <p>Training and Certification</p> <ul style="list-style-type: none"> Ensure all HVAC technicians are EPA Section 608 certified. Provide training on low-GWP refrigerant handling and leak prevention. <p>Third-Party Verification</p> <ul style="list-style-type: none"> Obtain third-party verification of refrigerant management practices through programs such as GreenChill or LEED Enhanced Refrigerant Management credit. <p>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)</p>				

Table 1. Supplemental Mitigation Monitoring and Reporting Program

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
<p>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.</p> <p><i>Timeline for Acquisition of Carbon Offset Credits</i></p> <p>Construction</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>Operation</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_{2e} per year threshold, consistent with the quantification, performance standards and requirements set forth below. Alternatively, the Project Applicant or its designee may purchase and retire annual operational GHG offsets for a period of 30 years by December 31 of the year preceding each new year after the issuance of the final certificate of occupancy. Annual operational GHG emission offsets shall also be subject to the same quantification, performance standards, and requirements set forth below.</p> <p><i>Quantification of GHG Emissions and Reductions Required</i></p> <p>Construction</p>				

Table 1. Supplemental Mitigation Monitoring and Reporting Program

Mitigation Measures/Project Design Features			Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion																								
<p>The estimated total construction GHG emissions to be offset are 3,362.30 MT CO₂e 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"> <thead> <tr> <th>Year</th> <th>Offsets Required (MT CO₂e)</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>Total</td> <td>3,362.30</td> <td></td> </tr> </tbody> </table> <p>Notes: MT CO₂e = metric tons of carbon dioxide equivalent; N/A = not applicable.</p> <p>Operation</p> <p>The estimated operational emissions are 7,408.02 MT CO₂e. To mitigate operational emissions below the 1,400 MT CO₂e per year threshold, the Project would purchase and retire one lump sum of 180,270.60 MT CO₂e of offsets (7,408.02 MT CO₂e – 6,009.02 [offsets] = 1,399 MT CO₂e remaining); 6,009.02 MT CO₂e × 30-year life = 180,270.60 MT CO₂e; 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> <table border="1"> <thead> <tr> <th>Scenario</th> <th>Offsets Required (MT CO₂e)</th> <th>Purchase and Retirement Deadline</th> </tr> </thead> <tbody> <tr> <td>Lump sum</td> <td>180,270.60</td> <td>Prior to issuance of certificate of occupancy</td> </tr> </tbody> </table>			Year	Offsets Required (MT CO ₂ 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	Total	3,362.30		Scenario	Offsets Required (MT CO ₂ e)	Purchase and Retirement Deadline	Lump sum	180,270.60	Prior to issuance of certificate of occupancy				
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Table 1. Supplemental Mitigation Monitoring and Reporting Program

Mitigation Measures/Project Design Features			Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
Annual basis 30-year term	6,009.02	Prior to issuance of certificate of occupancy for Year 1 and December 31 of preceding year				
<p>Notes: MT CO_{2e} = metric tons of carbon dioxide equivalent; N/A = not applicable.</p> <p>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.</p> <p>Carbon Offset Standards – Eligible Registries, Acceptable Protocols, Defined Terms, and Geographic Priorities</p> <p>“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.</p> <p>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:</p> <ol style="list-style-type: none"> 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 						

Table 1. Supplemental Mitigation Monitoring and Reporting Program

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
<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"> 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 <i>Reserve Offset Program Manual</i>¹ (April 2024) and <i>Climate Forward Program Manual</i>² (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 Removals</i>³ (July 2023); and Verra’s <i>VCS Standard, Program Guide</i>⁴ (August 2023), and <i>Methodology Requirements</i>⁵ (October 2023). <p>The City has reviewed the registries’ methodologies and has determined that protocols established pursuant to such methodologies – including</p>				

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

Table 1. Supplemental Mitigation Monitoring and Reporting Program

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
<p>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_{2e} that is “not otherwise required” (CEQA Guidelines Section 15126.4[c][3]). The carbon offsets must achieve the standard of additional, real, permanent, quantifiable, verifiable, and enforceable reductions, which are defined for purposes of this mitigation measure as follows consistent with the applicable provisions in the California Code of Regulations, Title 17:</p> <ol style="list-style-type: none"> 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. 				

Table 1. Supplemental Mitigation Monitoring and Reporting Program

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
<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 offsets are unavailable; (3) offsets within the United States, only if in-state offsets are unavailable.⁶</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><i>Monitoring, Reporting, and Enforcement Standards</i></p>				

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

Table 1. Supplemental Mitigation Monitoring and Reporting Program

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
<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 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>				

Table 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 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> <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>				
Project Design Features				
PDF-4: Construction equipment should be maintained in proper tune.	During construction	City of Garden Grove		
PDF-5: All construction vehicles should be prohibited from excessive idling. Excessive idling is defined as 5 minutes or longer.	During construction	City of Garden Grove		
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.	During construction	City of Garden Grove		
PDF-10: Use haul trucks with on-road engines instead of off-road engines for on-site hauling.	During construction	City of Garden Grove		

Table 1. Supplemental Mitigation Monitoring and Reporting Program

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
PDF-11: The Project will comply with the mandatory requirements of the latest California Building Standards Code, Title 24, Part 6 (Energy Code) and Part 11 (California Green Building Standards Code [CALGreen]), including the provisions for bicycle parking, electric vehicle charging stations, energy efficiency, material conservation, and water/waste reduction.	During operations.	City of Garden Grove		
PDF-12: Install signage at loading docks requiring trucks to limit engine idling times to 5 minutes or less.	During operations	City of Garden Grove		
PDF-21: Engine idling time for all delivery vehicles and trucks must be limited to 5 minutes or less. Signage should be posted in the designated loading areas reflecting the idling restrictions.	During operations	City of Garden Grove		
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.	During construction	City of Garden Grove		
PDF-28: The Project amenities shall be available to registered hotel guests only. There will be no day passes allowed.	Prior to project opening	City of Garden Grove		
PDF-29: The Project amenities include a self-service bicycle repair station adjacent to the guest and employee bicycle parking spaces.	During project construction for installation and during project operation for maintenance and	City of Garden Grove		

Table 1. Supplemental Mitigation Monitoring and Reporting Program

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
	provision of bicycle repair.			
Transportation				
Mitigation Measures				
<p>MM-TRA-1: Implement Commute Trip Reduction Marketing: 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> <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"> a) The Applicant shall provide on site or online commuter information services to employees. The Applicant shall also distribute a quarterly newsletter with tips, success stories, and updates to ensure education and encouragement for the CTR program. b) The CTR shall require the Project Applicant or their designee to appoint a Commute Program Coordinator to oversee the implementation and management of the marketing strategy. c) The Applicant shall ensure on-site or online subsidized transit pass sales are available to all employees. d) The Applicant shall provide guaranteed ride home service by matching employees with other employees or providing access to platforms such as Rideharing.com and Lyft that connect riders for daily commutes with nearby drivers. e) A minimum of 10 preferential parking spaces for carpools/vanpools shall be provided. <p><i>(CAPCOA Measures T-7, T-9-B)</i></p>	Prior to project opening.	City of Garden Grove		
<p>MM-TRA-2: Provide End-of-Trip Bicycle Facilities: 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.</p>	During project construction for installation and	City of Garden Grove		

Table 1. Supplemental Mitigation Monitoring and Reporting Program

Mitigation Measures/Project Design Features	Implementation Timing	Agency Responsible for Monitoring	Initials	Date of Completion
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)	during project operation for maintenance and provision of bicycle rentals.			
Project Design Features				
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_{2e} = metric tons of carbon dioxide equivalent; VOC = volatile organic compound; N/A = not applicable.

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