COAST STREET APARTMENTS PROJECT

CLASS 32 EXEMPTION CHECKLIST

Site Plan No. SP-162-2025

Lead Agency:

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

Project Contact:

Huong Ly, Associate Planner
huongl@ggcity.org
714-741-5312

CEQA Consultant:

RE Consulting
renee@renvconsulting.com

September 2025

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Acronym List

ADT	Average Daily Trips
AQMP	Air Quality Management Plan
AB	Assembly Bill
APN	Assessor Parcel Number

BMPs	Best Management Practices
CAA	Clean Air Act
CalEEMod	California Emissions Estimator Model
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CNEL	Community Noise Equivalent Level
CMU	Concrete Masonry Unit
CO	Carbon Monoxide
CY	Cubic Yards
DAMP	Drainage Area Management Plan
dBA	A-weighted decibel
FAR	Floor Area Ratio
FTA	Federal Transit Administration
GGMC	Garden Grove Municipal Code
GHG	Greenhouse Gas
HQTA	High-Quality Transit Area
ITE	Institute of Transportation Engineers
lbs	pounds
LCFS	Low Carbon Fuel Standard
LID	Low Impact Development
LOS	Level of Service
LST	Local Significance Thresholds
MBTA	Migratory Bird Treaty Act
MLD	Most Likely Descendant
MTCO2e	metric tons carbon dioxide equivalent
NPDES	National Pollutant Discharge Elimination System
NAHC	Native American Heritage Commission
NOx	Nitrous Oxides
OCTA	Orange County Transportation Authority
OPR	Governor's Office of Planning and Research
PM	Particulate Matter
PPM	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCH	State Clearinghouse
SF	Square Foot
SOx	Oxides of Sulfur
SR	State Route
SRA	Source Receptor Area
SWPPP	Storm Water Pollution Prevention Plan
TAC	Toxic Air Contaminant
TAZ	Traffic Analysis Zone

TPA	Transit Priority Area
VdB	velocity in decibels
VMT	Vehicle Miles Traveled
UCACE	United States Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geologic Survey
WDRs	Waste Discharge Requirements
WQMP	Water Quality Management Plan

1.0 INTRODUCTION

The applicant (West Street Investments, LLC) is requesting approval from the City of Garden Grove (the City) to redevelop 13040 Coast Street (the Project site) with a five-story multi-family residential building with 34 one and two-bedroom apartments (the Project). The Project would also provide onsite parking and open space areas. The City is the Lead Agency for the proposed Project.

1.1 PURPOSE OF THE NOTICE OF EXEMPTION

This Class 32 Infill Exemption has been prepared in accordance with the following:

- California Environmental Quality Act (CEQA) of 1970 (Public Resources Code Sections 21000 et seq.)
- California Code of Regulations, Title 14, Division 6, Chapter 3 (CEQA Guidelines, Sections 15000 et seq.).

Article 19 of the California Environmental Quality Act (CEQA) Guidelines includes, as required by Public Resources Code Section 21084, a list of classes of projects which have been determined not to have a significant effect on the environment.

Pursuant to CEQA Guidelines Section 15332, the Project would qualify for a Class 32 Exemption if it is: (a) consistent with the General Plan designation and policies and zoning regulations; (b) is located within the City limits, surrounded by urban uses and is less than 5 acres in size; (c) has no value for endangered, rare or threatened species; (d) would not result in any significant effects related to traffic, noise, air quality or water quality; and (e) can be adequately served by all required utilities and public services. Additionally, in order to qualify for the exemption, none of the exceptions identified in CEQA Guidelines Section 15300.2 can apply. As shown in this document, the Project meets all the aforementioned qualifying criteria and none of the exceptions applies.

Existing Regulations that Reduce Potential Impacts
Throughout the analysis in this Class 32 Exemption Checklist, reference is made to requirements that are applied to all development on the basis of federal, state, or local law that reduce the potential for environmental impacts to occur.

1.2 DOCUMENT ORGANIZATION

This Class 32 Exemption Checklist includes the flowing sections:

Section 1.0 Introduction
It provides information about CEQA, its requirements for environmental review, and explains the Exemption Checklist that evaluates the potential impacts of the proposed Project to the physical environment.

Section 2.0 Project Setting
It provides information about the Project's location, a description of existing site uses, and identifies the existing General Plan and zoning designations.

Section 3.0 Project Description
It includes a description of the Project's physical features, along with construction and operational activities. Describes anticipated approvals and permits needed for implementation of the proposed Project.

Section 4.0 Class 32 Infill Exemption Requirements
It provides the CEQA Guidelines detailing the types of projects exempt from CEQA review related to urban infill development and exceptions to the exemptions.

Section 5.0 Proposed Project CEQA Exemption Compliance Analysis
Evaluates the Project's potential to result in significant adverse effects to the physical environment as required by CEQA Guidelines Section 15332 and identifies applicable regulations. In addition, Section 5.0 analyzes whether the proposed Project would result in any of the exceptions in the criteria of CEQA Guidelines Section 15300.2(b)-(f) (Exceptions) to the Project.

Section 6.0 References
It includes a list of sources that were used in preparation of this CEQA document.

2.0 PROJECT SETTING

2.1 PROJECT LOCATION

The Project site is located at 13040 Coast Street in the southwestern portion of the City, as shown in Figure 1, *Regional Location*. The Project site is located along the east side of Coast Street, just south of the intersection with Garden Grove Boulevard. Regional access to the site is provided by State Route 22 (SR-22) and the Beach Boulevard interchange. Beach Boulevard connects to Garden Grove Boulevard approximately 0.15-mile west of the Coast Street Garden Grove Boulevard intersection. The Project location is shown in Figure 2, *Local Vicinity*.

The Project site is identified as Assessor Parcel Number (APN): 097-011-03; and is located within the Anaheim United States Geological Survey (USGS) 7.5' topographic quadrangle. The site is within Township 05S, Range: 11W, Section 01, and Baseline San Bernardino. The latitude and longitude for the Project site are 33° 46' 23" North, 117° 59' 23" West.

The Project site is located within a Southern California Association of Governments (SCAG) 2045 High-Quality Transit Area (HQTA), which (as of January 1, 2025 per Assembly Bill 2553, Friedman) are areas within 0.5-mile of a transit stop or a transit corridor with 20-minute or less service frequency during peak commute hours. The site is also within a Transit Priority Area (TPA) as identified by Exhibit 4.14-6, *Transit Priority Areas*, of the Focused General Plan Update and Zoning Amendments Draft EIR.

2.2 EXISTING PROJECT SITE

The 0.54-acre Project site is currently developed with a vacant 3,252 square foot building that was constructed in 1967 and previously used by the Gospel First Korean Baptist Church that was once located across Coast Street from the Project site (on the southwesterly corner of Coast Street and Garden Grove Boulevard) and has relocated. The Project site building was used by the church as a school, pre-school, and location for meetings; but has remained vacant, except for storage uses, since purchase by its existing owner in August 2022.

The one-story building is wood-frame construction, with stucco and wood-trim exterior facings. As shown in Figure 3, *Aerial View*, the site also contains limited ornamental landscaping, and a parking area with a driveway connection to Coast Street. The site is bound by existing walls along the north, east, and south sides of the site. The site frontage includes limited ornamental landscaping, ground covers, and is bound by an existing sidewalk along Coast Street, and an alley called Emerson Avenue to the south.

2.3 EXISTING GENERAL PLAN LAND USE AND ZONING OF THE PROJECT SITE

The Project site has a City of Garden Grove General Plan land use designation of Medium Density Residential (MDR) with a maximum density of 32 units per acre, and a zoning designation of R-3 (Multiple-Family Residential) that also has a maximum density of 32 units/acre (Garden Grove Municipal Code [GGMC] 9.12.040.020). The surrounding development consists of residential, church, commercial, and auto repair uses. The zoning of the Project site and surrounding areas are shown in Figure 4.

2.4 SURROUNDING LAND USES

The Project site is located within a fully developed area. The surrounding land uses and zoning are described in Table 1.

Table 1: Surrounding Existing Land Uses and Designations

Direction	Existing Land Use	General Plan Land Use Designation	Zoning Designations
North	Commercial and Auto Repair	Medium Density Residential (MDR)	R-3 (Multiple-Family Residential)
East	Commercial/Vehicle Storage	Medium Density Residential (MDR)	R-3 (Multiple-Family Residential)
South	Multi-Family Residential south of Emerson Avenue	Medium Density Residential (MDR)	R-3 (Multiple-Family Residential)
West	Parking lot for the vacant church to the northwest across Coast Street	Residential/Commercial Mixed Use 1	GGMU-1 (Garden Grove Blvd Mixed Use Zone 1)

Figure 1: Regional Location

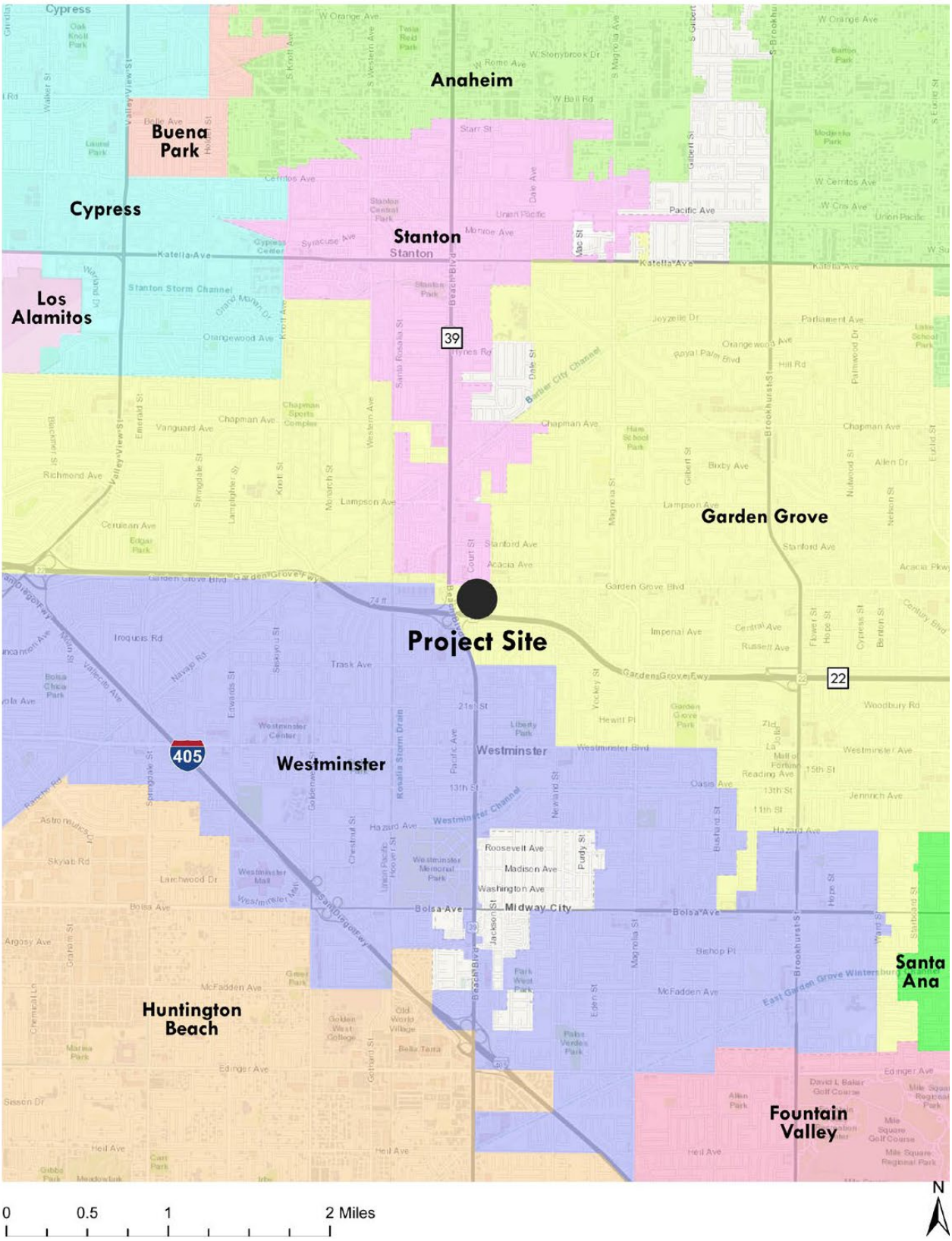


Figure 2: Local Vicinity

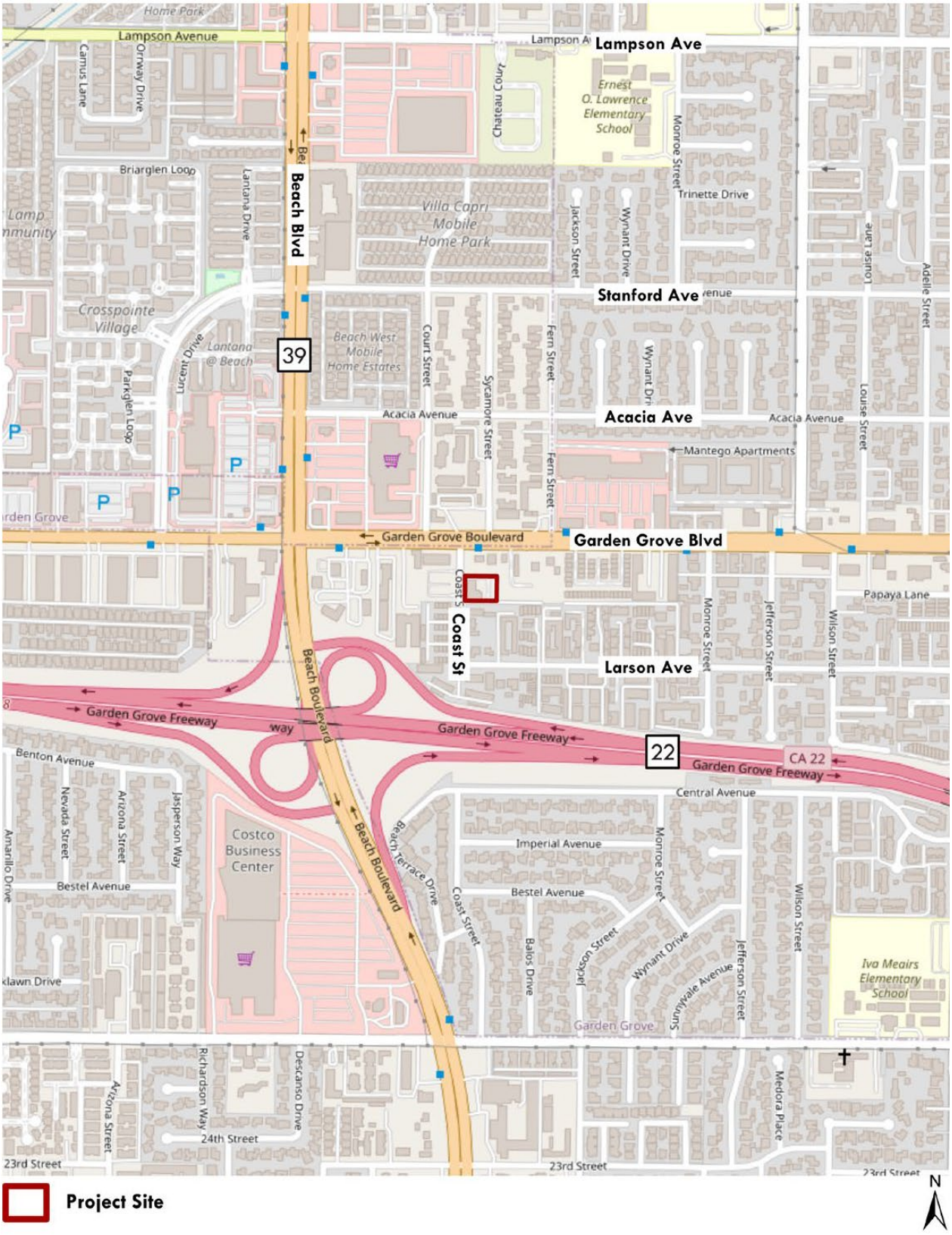
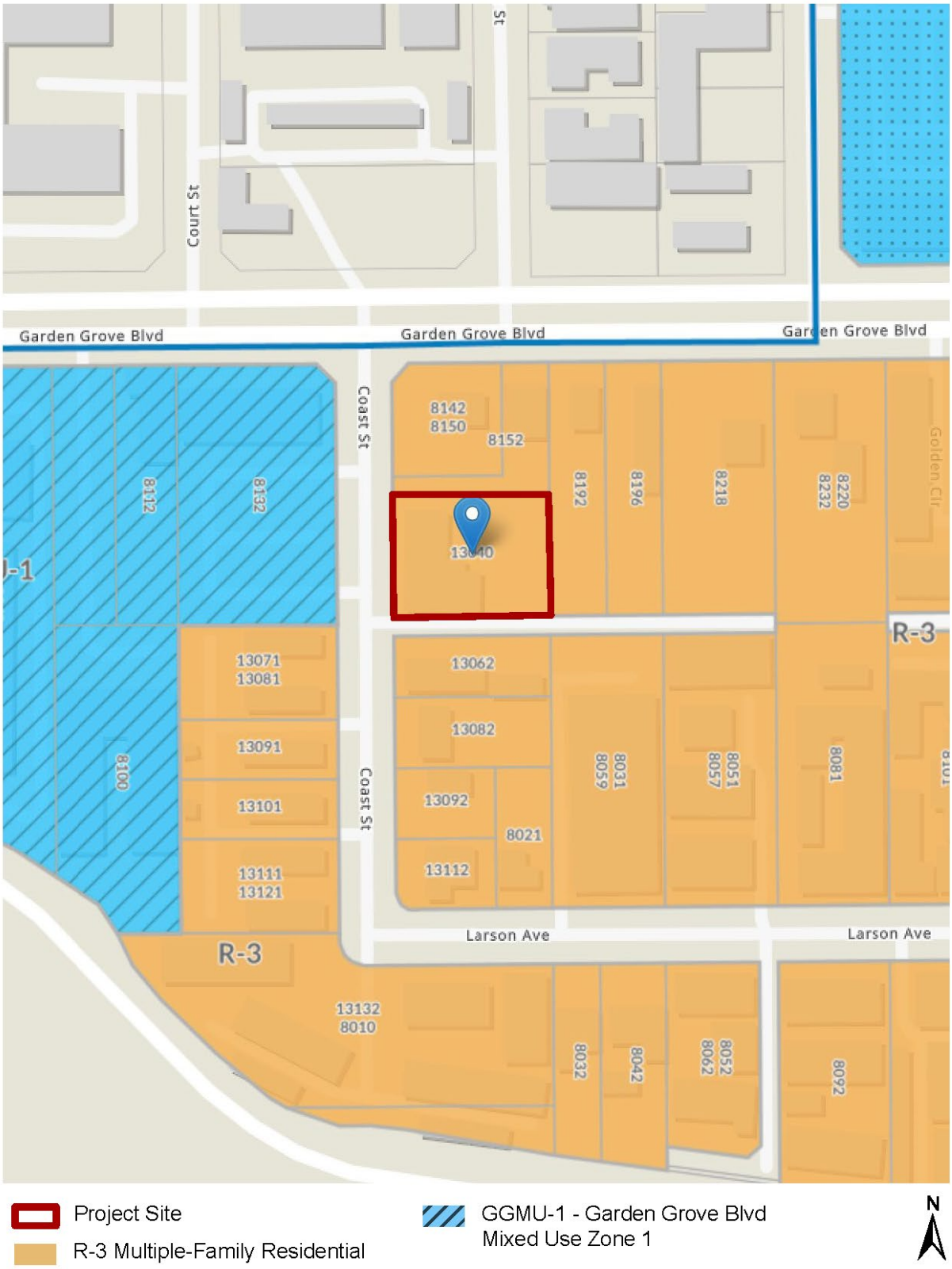


Figure 3: Aerial View

Figure 4: Project Site and Surrounding Zoning Designations



3.0 PROJECT DESCRIPTION

3.1 PROJECT OVERVIEW

The proposed Project would remove the existing building and related improvements and infrastructure and redevelop the site with 34 new for rent residential units within one building that would have one level of parking and four levels of one- and two-bedroom residences. The Project also includes a community room, onsite landscaped areas, and a private deck. Onsite parking area would be accessed from a proposed driveway along Coast Street and off the alley on the south side of the Project.

Three of the proposed units would be very-low Income affordable units and three of the proposed units would be moderate-income affordable units. The base density allowed for the 0.54 gross acre site is 32 dwelling units per acre or 18 dwelling units (0.54 gross acres x 32 dwelling units per acre equals 17.28 dwelling units rounded to 18 dwelling units). By providing three very low income housing units, which would be 16.7 percent of the allowable base units, the proposed Project would receive a 50 percent density bonus (Government Code Section 65915(f)(2)). Also, three of the proposed units would be moderate-income affordable units, which would exceed 12 percent of the allowable base units; and therefore, is eligible for an additional 38.75 percent density bonus (Government Code Section 65915(v)). With approval of the State Density Bonus Law entitlement request, the proposed Project would be eligible for a density of 68 units per gross acre. The Project requires approval of a Site Plan.

3.2 PROJECT FEATURES

Building Structure
The Project would develop the site with a five-story multi-family residential building that would have one level of at grade parking under four levels of one- and two-bedroom residences, and a second story podium deck, as shown in Figure 5, *Conceptual Site Plan*. The five-story building would have a total gross building floor area of 61,297 square feet and a net floor area, as defined in the GGMC, of 42,594 square feet. The building would have a footprint of 11,904 square feet and a height of 65 feet to top of parapet, with the roof at 55 feet 6 inches.

The building would be a cement and stucco structure with veneer, metal panel walls and canopies, wood awnings, and large windows, as shown in Figures 6 and 7. The proposed building would have a minimum front setback of six feet, minimum side setback of 10-feet, minimum street side (alley) setback of 15 feet, and minimum rear setback of 10 feet in compliance with the GGMC Section 9.12.040.020 and modified with density bonus waivers for the front setback and the front, side, and rear stepbacks.

Residential Units
The proposed residences would consist of one- and two-bedroom units, which are detailed in Table 2. Each unit would each have a 95 square foot balcony.

Table 2: Proposed Residential Units

Floor Plan	Bedrooms	Bathrooms	Net Area	# of Units
Unit A	1	1	656	12
Unit B	2	2	935	22
Total				**34**

The Project also includes a 1,782 square foot community room; a 3,201 square-foot open podium on the second level of the building that would have open space amenities for residents, such as barbeques, fitness equipment, yoga area; and 2,264 square feet of ground level open space, as shown in Figure 8.

Of the proposed residential units, three would be very-low-income affordable units and three would be moderate-income affordable units, as defined in Sections 50093 and 50105 of the California Health and Safety Code. Pursuant to Govt Code Section 65915, the Project includes an additional density bonus (an allowance for additional units) as follows: in exchange for providing 16 percent very-low-income affordable units the Project is entitled to a 50 percent density bonus and in exchange for providing 12 percent moderate-income affordable units the Project is entitled to an additional density bonus of 38.75 percent. Additionally, the Project is entitled to incentives and waivers pursuant to Govt Code Section 65915.

Access, Circulation, and Parking

The proposed Project would be accessed through a 30-foot-wide driveway entrance off Coast Street, as shown in Figure 5 *Conceptual Site Plan*. The driveway would lead directly to a parking garage on the ground level (first floor) of the building that would include 36 vehicle parking spaces and bike racks/storage. An additional nine (9) vehicle parking spaces would be accessed off the 25-foot-wide alley on the south side of the proposed building. A total of 45 onsite vehicle spaces are proposed.

Lighting

Outdoor lighting included as part of the Project would be typical of residential uses and would consist of primarily wall-mounted lighting, entrance lighting, landscaping and sign lighting, and parking garage lighting. All the Project's outdoor lighting would be directed downward and shielded to minimize off-site spill in compliance with City's lighting regulations related to multi-family residential uses (GGMC Section 9.12.040.210).

Landscaping

The proposed Project would include landscaping around the proposed building and along the Coast Street frontage. As shown in Figure 9, *Conceptual Landscape Plan,* the landscaping would include 15-gallon and 24-inch box trees, various shrubs, and ground cover per GGMC Section 9.12.040.090. Landscaping would be drought tolerant, in compliance with the City's landscaping regulations.

Walls and Gates

The Project includes removal of the existing walls along the north and east sides of the site that would be replaced with 8-foot-high concrete masonry unit (CMU) walls. The first 20 feet of the north and east sides of the site from the eastern property line would be delineated by a 3-foot-high tubular steel fence. Gates would be provided to access the proposed passive open space areas along the north and east sides of the site.

Infrastructure Improvements

The proposed Project would provide roadway frontage improvements and would install new utilities on the Project site that would serve the Project and connect to existing offsite infrastructure.

Street: The proposed Project would remove the existing curb, gutter, and roadway pavement and would provide new pavement, curb, gutter, and sidewalk along the Project site frontage.

Alley: The existing 20-foot-wide asphalt alley along the southern boundary of the site would be expanded to 25 feet in width to allow for fire ladder access and the asphalt would be removed and replaced with concrete. The entrance to the garage from the alley would also be made of concrete to support emergency access.

Water and Sewer: The proposed Project would install 6-inch water lines and sewer lines on the site that would connect to the existing 8-inch water line and 8-inch sewer line in Coast Street.

Drainage: The proposed Project would install an onsite drainage and bioretention system to capture and treat stormwater. Stormwater on the Project site would be conveyed to biofiltration areas so storm water will be filtered by a biofiltration basin. Excess storm runoff would flow to proposed sump pump and then would be discharged to the street, as detailed in the Preliminary Water Quality Management Plan (WQMP) (Appendix F).

3.3 PROJECT CONSTRUCTION

Construction activities for the Project would occur in one phase. Per the California Emissions Estimator Model (CalEEMod) default construction timeline estimator, construction would last approximately six months. Construction would occur in the following stages that would not overlap: (1) demolition; (2) site preparation; (3) grading and excavation; (4) building construction; (5) paving; and (6) application of architectural coatings. Construction of the Project would require demolition and removal of approximately 450 cubic yards (cy) of demolition debris and import of approximately 233 cubic yards of soil during grading. Table 3 details total working days for each phase of construction for analytical modeling purposes. Project construction would not involve the use of vibratory rollers, which is consistent with CalEEMod default assumptions. Construction activities would be limited to the hours allowed by the GGMC Section 8.47.060(D) that limits the hours and days of construction activities.

Table 3: Construction Schedule

Construction Phase	Working Days	Equipment
Demolition	10	Tractors, Loaders, Backhoes, Rubber Tired Dozer, Concrete/Industrial saw
Site Preparation	1	Grader, Tractors, Loaders, Backhoes, Crawler Tractors
Grading	2	Grader, Rubber Tired Dozer, Tractors, Loaders, Backhoes, Crawler Tractors
Building Construction	100	Crane, Forklifts, Tractors, Loaders, Backhoes,
Paving	5	Tractors, Loaders, Backhoes, Cement and Mortar Mixers, Pavers, Rollers
Architectural Coating	10	Air Compressor

3.4 GENERAL PLAN LAND USE AND ZONING

The Project site has City of Garden Grove General Plan land use designation of Medium Density Residential (MDR). The General Plan states that the Medium Density Residential designation provides for multi-family residential neighborhoods that provide a variety of housing types; including traditional multi-family apartments, condominiums, townhomes, and single-family small-lot subdivisions. The General Plan states that the densities for Medium Density Residential are intended to range from 21.1 to 32.0 dwelling units per acre and that the land use designation is implemented by the R-3 zoning designation.

The Project site has a zoning designation of R-3 (Multiple-Family Residential), which is intended to provide for a variety of types and densities of multiple-family residential dwellings. This zone is intended to promote housing opportunities in close proximity to employment and commercial centers (GGMC Section 9.12.020.020). The zoning and General Plan allow projects with building heights of three stories (35-foot height limit) and residential densities up to 32 units per acre.

3.5 DISCRETIONARY APPROVALS AND PERMITS

The following discretionary approval and permits are anticipated from the City of Garden Grove to be necessary for implementation of the proposed Project:

- Approval of a Site Plan
- Approval of a Density Bonus, including concessions and waivers as follows:
    1. A concession to GGMC Section 9.12.040.020(A) to allow for an increase of the height of the main structure to 55 feet 6 inches.
    2. A concession to GGMC Section 9.12.040.020(A) to allow for an increase in the number of stories to five.
    3. A concession to GGMC Section 9.12.040.020(A) to allow for an increase of lot coverage to 71%.
    4. A concession to GGMC Section 9.48.030 to allow the existing power lines along Coast Street to remain in place and not be subject to the undergrounding requirements of the code.
    5. A waiver of GGMC Section 9.12.040.020(A) to allow for a reduction of the required front yard setback at the first and second floors to 6 feet.
    6. A waiver of GGMC Section 9.12.040.020(A) to allow for a reduction of the required front yard stepback at the third through fifth floors to 6 feet.
    7. A waiver of GGMC Section 9.12.040.020(A) to allow for a reduction of the required north side yard stepback at the third through fifth floors to 10 feet.
    8. A waiver of GGMC Section 9.12.040.020(A) to allow for a reduction of the required rear yard stepback at the third through fifth floors to 10 feet.
    9. A waiver of GGMC Section 9.12.040.020(E) to allow for a reduction of the minimum unit size requirement to approximately 656 square feet in lieu of 750 square feet for the one-bedroom units.
- Approvals and permits necessary to execute the proposed Project, including but not limited to, grading permit, building permit, etc.

Figure 5: Conceptual Site Plan

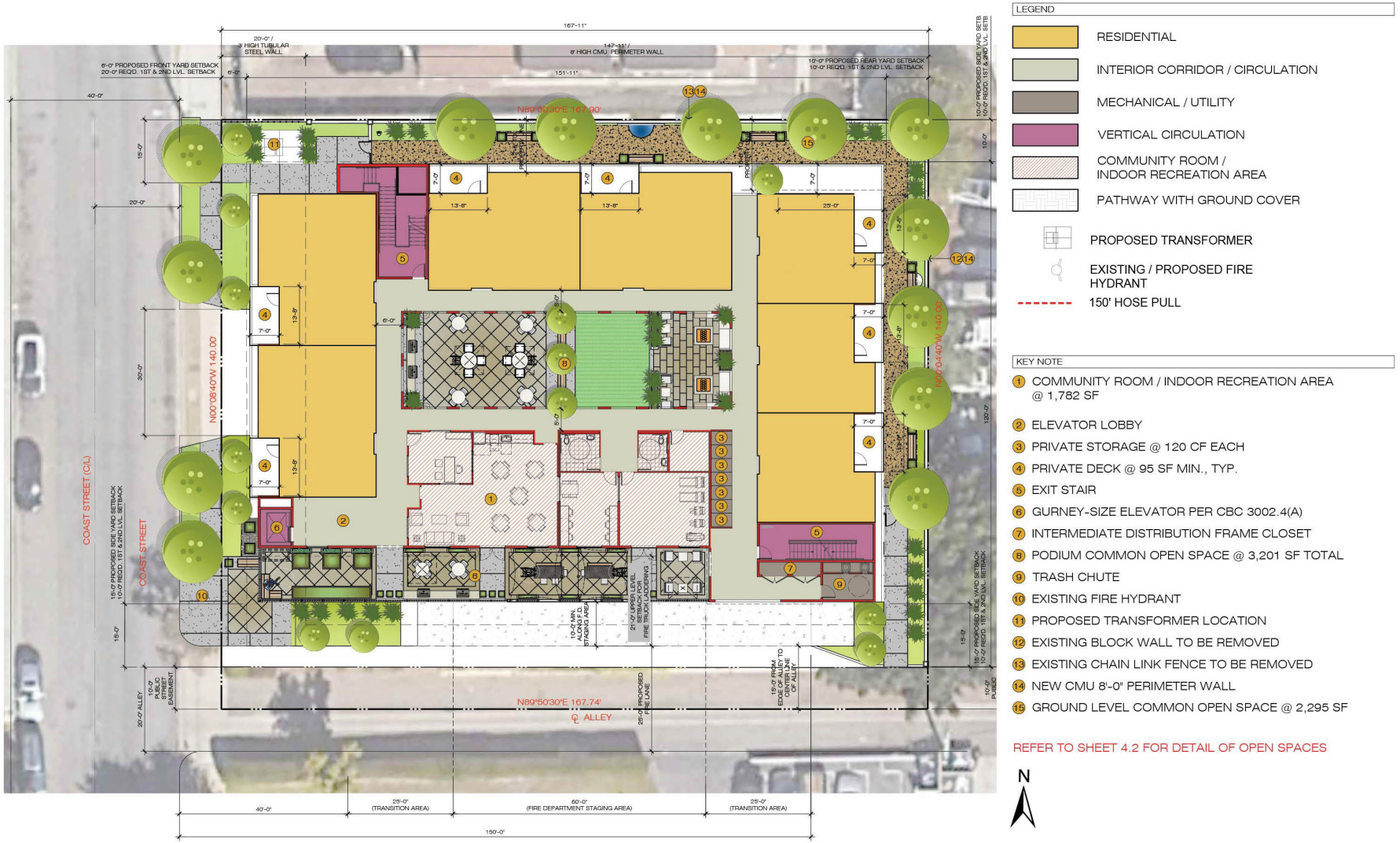


Figure 6: Building Elevations South and West

2. SOUTH ELEVATION (ALLEY)

1. WEST ELEVATION (COAST STREET)

KEY NOTE

1. EXTERIOR CEMENT STUCCO COLOR 1
2. EXTERIOR CEMENT STUCCO COLOR 2
3. EXTERIOR CEMENT STUCCO COLOR 3
4. SYNTHETIC EXTERIOR BOARD
5. ENHANCED EXTERIOR VENEER
6. EXTERIOR METAL CLADDING
7. 2" MIN. RECESSED DUAL GLAZED VINYL WINDOWS WHITE COLORED FRAME
8. WOOD FRAMED AWNING
9. METAL CANOPY
10. SCREED LINE
11a. 3' HIGH TUBULAR STEEL WALL
11b. 8' HIGH CMU PERIMETER WALL
12. PAINTED METAL GUARD RAIL WITH TREX
13. 2" MIN. RECESSED STOREFRONT WINDOW AND DOOR
14. PAINTED METAL COPING

NOTE:
STOREFRONTS AND WINDOWS SHALL BE INSET FROM EXTERIOR FAÇADE PLANES AND/OR ADJOINING EXTERIOR WALL PLANES A MINIMUM OF TWO INCHES TO REALIZE INCREASED SHADE, SHADOW, AND VISUAL TEXTURE ALONG THE BUILDING FACE

KEY MAP

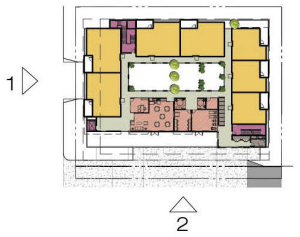


Figure 7: Building Elevations North and East

4. NORTH ELEVATION

3. EAST ELEVATION

KEY NOTE

1. EXTERIOR CEMENT STUCCO COLOR 1
2. EXTERIOR CEMENT STUCCO COLOR 2
3. EXTERIOR CEMENT STUCCO COLOR 3
4. SYNTHETIC EXTERIOR BOARD
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KEY MAP

Figure 8: Conceptual Open Space Plan

Figure 9: Conceptual Ground Level Landscape Plan

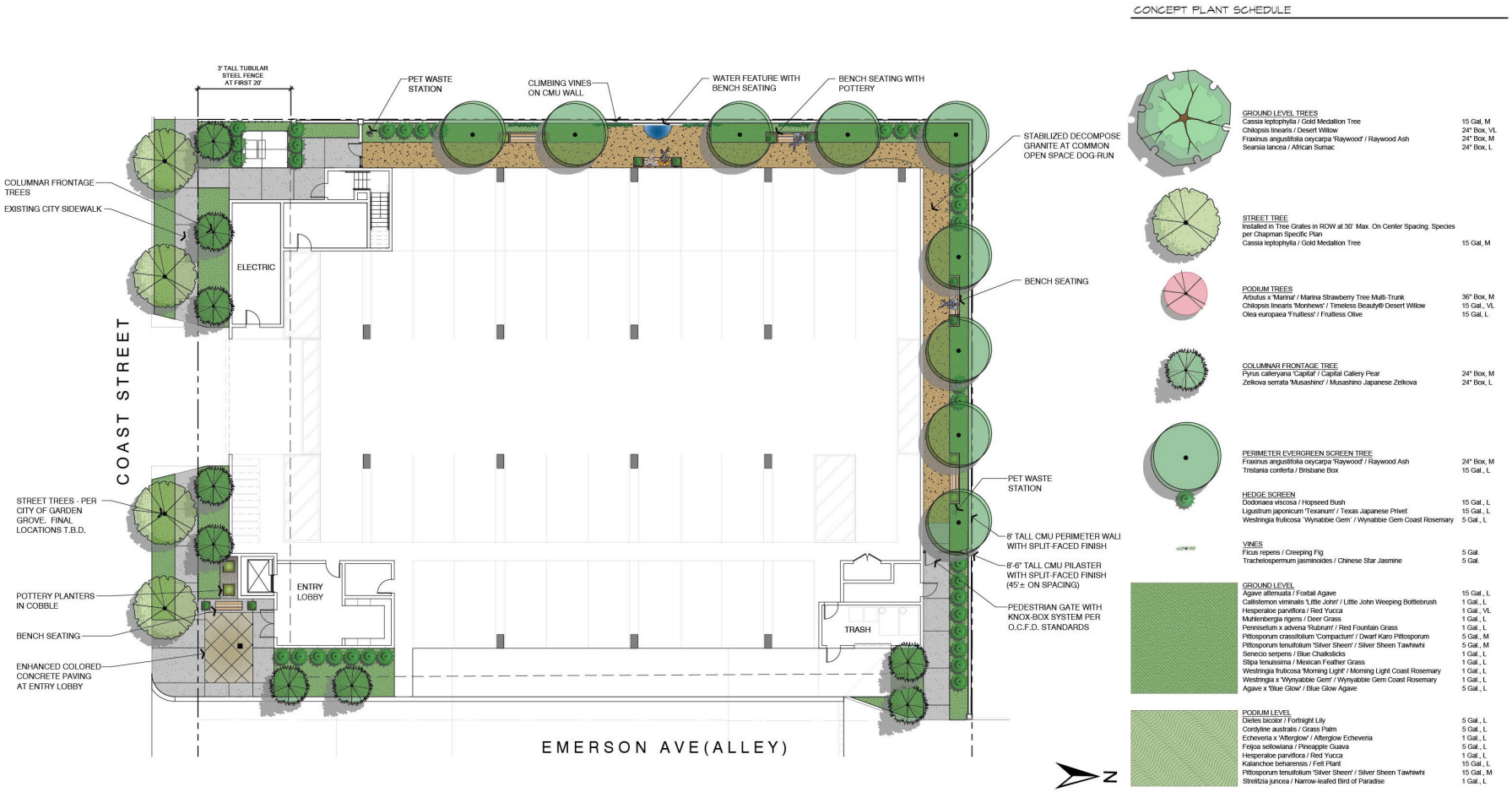
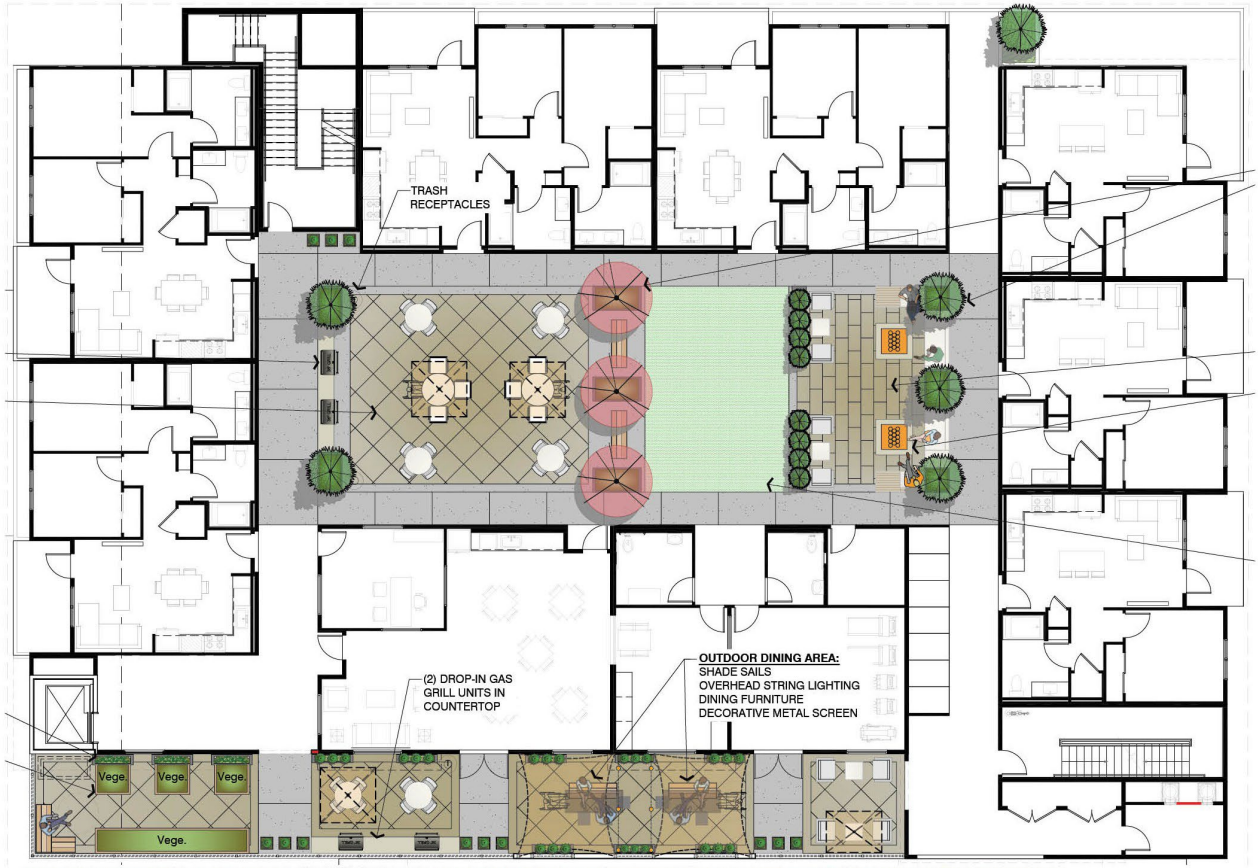
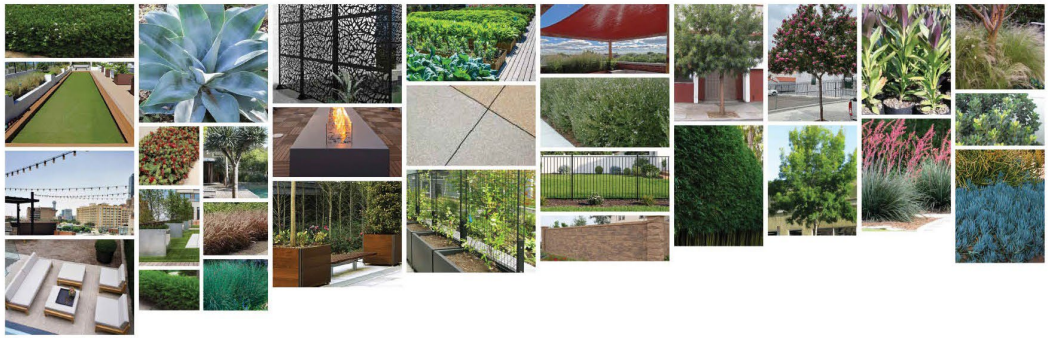


Figure 10: Conceptual Podium Level Landscape Plan





CONCEPT PLANT SCHEDULE

GROUND LEVEL TREES
Cassia leptophylla / Gold Medallion Tree 15 Gal, M
Chilopsis linearis / Desert Willow 24" Box, VL
Fraxinus angustifolia oxycarpa 'Raywood' / Raywood Ash 24" Box, M
Searsia lancea / African Sumac 24" Box, L

STREET TREE
Installed in Tree Grates in ROW at 30' Max. On Center Spacing. Species per Chapman Specific Plan
Cassia leptophylla / Gold Medallion Tree 15 Gal, M

PODIUM TREES
Arbutus x 'Marina' / Marina Strawberry Tree Multi-Trunk 36" Box, M
Chilopsis linearis 'Monhews' / Timeless Beauty® Desert Willow 15 Gal., VL
Olea europaea 'Fruitless' / Fruitless Olive 15 Gal, L

COLUMNAR FRONTAGE TREE
Pyrus calleryana 'Capital' / Capital Callery Pear 24" Box, M
Zelkova serrata 'Musashino' / Musashino Japanese Zelkova 24" Box, L

PERIMETER EVERGREEN SCREEN TREE
Fraxinus angustifolia oxycarpa 'Raywood' / Raywood Ash 24" Box, M
Tristania conferta / Brisbane Box 15 Gal., L

HEDGE SCREEN
Dodonaea viscosa / Hopseed Bush 15 Gal., L
Ligustrum japonicum 'Texanum' / Texas Japanese Privet 15 Gal., L
Westringia fruticosa 'Wynabbie Gem' / Wynabbie Gem Coast Rosemary 5 Gal., L

VINES
Ficus repens / Creeping Fig 5 Gal.
Trachelospermum jasminoides / Chinese Star Jasmine 5 Gal.

GROUND LEVEL
Agave attenuata / Foxtail Agave 15 Gal., L
Callistemon viminalis 'Little John' / Little John Weeping Bottlebrush 1 Gal., L
Hesperaloe parviflora / Red Yucca 1 Gal., VL
Muhlenbergia rigens / Deer Grass 1 Gal., L
Pennisetum x advena 'Rubrum' / Red Fountain Grass 1 Gal., L
Pittosporum crassifolium 'Compactum' / Dwarf Karo Pittosporum 5 Gal., M
Pittosporum tenuifolium 'Silver Sheen' / Silver Sheen Tawhiwhi 5 Gal., M
Senecio serpens / Blue Chalksticks 1 Gal., L
Stipa tenuissima / Mexican Feather Grass 1 Gal., L
Westringia fruticosa 'Morning Light' / Morning Light Coast Rosemary 1 Gal., L
Westringia x 'Wynyabbie Gem' / Wynyabbie Gem Coast Rosemary 1 Gal., L
Agave x 'Blue Glow' / Blue Glow Agave 5 Gal., L

PODIUM LEVEL
Dietes bicolor / Fortnight Lily 5 Gal., L
Cordyline australis / Grass Palm 5 Gal., L
Echeveria x 'Afterglow' / Afterglow Echeveria 1 Gal., L
Feijoa sellowiana / Pineapple Guava 5 Gal., L
Hesperaloe parviflora / Red Yucca 1 Gal., L
Kalanchoe beharensis / Felt Plant 15 Gal., L
Pittosporum tenuifolium 'Silver Sheen' / Silver Sheen Tawhiwhi 15 Gal., M
Strelitzia juncea / Narrow-leafed Bird of Paradise 1 Gal., L

N

4.0 CLASS 32 INFILL EXEMPTION REQUIREMENTS

Article 19 of the California Environmental Quality Act (CEQA Guidelines Sections 15300 to 15333), includes a list of classes of projects that have been determined to not have a significant effect on the environment and as a result, are exempt from review under CEQA.

Class 32 Infill Exemption
One class of projects exempt from CEQA review includes projects that are specified as urban infill development. CEQA Guidelines Section 15332 defines the Class 32 Infill Exemption as a project that meets the following five requirements:

a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.

b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.

c) The project site has no value as habitat for endangered, rare, or threatened species.

d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

e) The site can be adequately served by all required utilities and public services.

Exceptions
In addition to meeting the requirements listed above, the CEQA Guidelines Section 15300.2 provides specific instances where exceptions apply to a project that would otherwise meet the requirements for an exemption. These exceptions are:

a) Location: Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

b) Cumulative Impact: All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

c) Significant Effects: A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

d) Scenic Highways: A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

e) Hazardous Waste Sites: A categorical exemption shall not be used for a project located on a site which is included on any list complied pursuant to Section 65962.5 of the Government Code.

f) Historical Resources: A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

5.0 PROPOSED PROJECT CEQA EXEMPTION

The analysis below evaluates whether the Project qualifies for an exemption under CEQA Guidelines Section 15332 (i.e., Class 32). Additionally, the analysis evaluates whether any exceptions to qualifying for the categorical exemption, as identified in CEQA Guidelines Section 15300.2, apply.

a. Criterion Section 15332(a): General Plan and Zoning Consistency: *The Project is consistent with the applicable General Plan designation and all applicable General Plan policies as well as with applicable zoning designation and regulations.*

The Project site has a City of Garden Grove General Plan land use designation of Medium Density Residential (MDR) and a zoning designation of R-3 (Multiple-Family Residential), which both allow residential development at a range from 21.1 to 32.0 dwelling units per acre.[1] Based on the 0.54 gross acre site, the base permitted density is 18 dwelling units. As a result of including 16 percent of the base 18 dwelling units as very-low-income affordable units and 12 percent as moderate-income affordable units, the Project would be entitled to a stacked density bonus of 50 percent for the very-low-income affordable units and 38.75 percent for the moderate-income units. To this end, the proposed Project includes three units restricted for very-low-income households and three units restricted for moderate-income households. Thus, six (6) out of the 34 proposed residential units would be restricted income units.

State Density Bonus Law (Government Code Section 65915(f)(2)) states that a housing development is eligible for up to a 50 percent density bonus if 15 percent of the base units allowed under the zoning are reserved for very-low income households. In addition, State Density Bonus Law (Government Code Section 65915(v)) states that a housing development is eligible for up to an additional 38.75 percent density bonus if 12 percent of the base units allowed under the zoning are reserved for moderate-income households. Because out of the 34 proposed units three (3) would be restricted for very-low income households and three (3) would be restricted for moderate-income households, the resulting Project density of 68 units per net acre would be within the allowable density with application of the density bonuses.

Density bonus housing developments are also eligible for development incentives/concessions (per Government Code Section 65915(d)), waivers or reductions of development standards (per Government Code Section 65915(e)), and reduced parking standards. As a result of providing 16 percent very-low income dwelling units and 12 percent moderate-income units, the Project would be entitled to four (4) incentives/concessions, plus the waiver or reduction of development standards that would physically preclude the Project as proposed.

Table 4 shows the Project's consistency with the Medium Density Residential (MDR) land use and R-3 (Multiple-Family Residential) zoning development standards (GGMC 9.12.040). As shown, with application of the allowable density bonuses and development concessions and waivers, the proposed Project would meet all of the applicable land use and zoning development standards (*Wollmer v City of Berkeley* (2009) 179 Cal.App.4th 933, 944). Therefore, the Project would be consistent with the applicable regulations and meet the criteria of CEQA Guidelines Section 15332(a).

[1] See Garden Grove Land Use Element, Table 2-2.

Table 4: Consistency with Applicable Land Use and Zoning Development Standards

Development Feature	General Plan or Zoning Requirement	Proposed Project Consistency
Density	21.1 to 32.0 dwelling units per acre	**Consistent.** With application of a density bonus of 50 percent for 16% of the units reserved for very-low Income households and a density bonus of 38.75 percent with 12% of the units reserved for moderate-income households the Project density of 68 units per net acre would be within the allowable density.
Front Setback	20 ft. to 1st & 2nd Flr. 25 ft. to 3rd Flr.	**Consistent.** The proposed building would have a front yard setback at the 1st and 2nd floors to 6 feet, and a front stepback at the 3rd through 5th floor to 6 feet, which would be allowable with a density bonus waiver per Government Code Section 65915(e).
Side Setback Interior	10 ft. to 1st & 2nd Flr. 15 ft. to 3rd Flr.	**Consistent.** The proposed building would have a side setback at the 1st and 2nd floors to 10 feet, and a stepback at the 3rd through 5th floor to 10 feet, which would be allowable with a density bonus waiver per Government Code Section 65915(e).
Rear Setback	10 ft. to 1st & 2nd Flr. 15 ft. to 3rd Flr.	**Consistent.** The proposed building would have a rear setback at the 1st and 2nd floors to 10 feet, and a rear stepback at the 3rd through 5th floor to 10 feet, which would be allowable with a density bonus waiver per Government Code Section 65915(e).
Maximum Building Height	35 feet	**Consistent.** With application of a concession for density bonus housing per Government Code Section 65915(d), the maximum building height of 65 feet to top of parapet (55-feet 6-inches to the roofline) would be allowable and not result in a conflict.
Maximum Number of Stories	3 Stories	**Consistent.** The Project would be 5-stories in height, which would be allowable with a density bonus concession per Government Code Section 65915(d).
Maximum Lot Coverage	50%	**Consistent.** The proposed building would have a footprint of 11,904 SF on the approximately 23,494 gross SF Project site. Thus, the building would have a maximum lot coverage of 54.5%. Other improvements would add an additional

Development Feature	General Plan or Zoning Requirement	Proposed Project Consistency
		16.5% lot coverage. The total 71% lot coverage would be allowable with a density bonus concession per Government Code Section 65915(d).
Minimum Lot Size	7,200 SF	**Consistent.** The Project site is approximately 23,494 SF and exceeds the minimum lot size of 7,200 SF. Thus, the Project is consistent with this requirement.
Unit Size	Minimum unit size of 750 SF for one-bedroom units and 900 SF for two-bedroom units	**Consistent.** The Project proposes 656 SF one-bedroom units, which would be allowable with a density bonus waiver per Government Code Section 65915(e). The two-bedroom units would be 935 SF and exceed the required minimum.
Open Space	Combined usable private and common open space for the entire development shall equal a minimum of 300 SF per unit	**Consistent.** The Project proposes 315 SF of combined open space per unit, which exceeds the minimum requirement.
Minimum Total Square Feet for Active Recreation Area	900 SF	**Consistent.** The Project proposes 1,782 SF of active recreation, which exceeds the minimum requirement.
Undergrounding of the existing power lines along Coast Street	GGMC Section 9.48.030 undergrounding of existing power lines	**Consistent.** The Project would not underground the existing power lines along Coast Street pursuant to a concession (Government Code Section 65915(d)).

As described in Section 3.4, *General Plan Land Use and Zoning* of this document, the Land Use Element of the General Plan designates the Project site as Medium Density Residential (MDR). The Medium Density Residential (MDR) designation is intended for the development of mainly multi-family residential neighborhoods that:

- Provide a variety of housing types
- Provide access to schools, parks, and other community services
- Provide a high-quality architectural design that preserves privacy
- Provide common spaces, recreation areas and services convenient to residents
- Provide an excellent environment for family life
- Preserve residential property values"

The Project would revitalize the Project site that is was previously improved with a commercial building that is currently vacant. The building was used by a church as a school, pre-school, and location for meetings. The Project would provide one- and two-bedroom dwelling units in proximity to schools and other community services with high-quality architectural design. The Project includes common open space and recreational amenities that would be in close proximity to retail commercial and services. The Project would encourage revitalization as the Project would increase residential property valuation in the Project vicinity.

The Project is also consistent with applicable General Plan Land Use Element and Housing Element goals and policies as detailed below.

Goal LU-1: The City of Garden Grove is a well-planned community with sufficient land uses and intensities to meets the needs of anticipated growth and achieve the community's vision.

Policy LU-1.1: Identify appropriate locations for residential and non-residential development to accommodate growth through the year 2030 on the Land Use Diagram (Exhibit LU-3).

Consistent: The Project would include residential development consistent with the Medium Density Residential (MDR) designation and with a density bonus pursuant to State Density Bonus Law.

Policy LU-1.2: Encourage modern residences in areas designated as Mixed Use. Mixed-use housing should minimize impacts on designated single-family neighborhoods.

Consistent: The Project is located just south of Garden Grove Boulevard; a primary arterial road lined with various commercial retail establishments and shopping centers. The site is adjacent to commercial retail uses and multi-family residential; none of which includes single-family homes. The Project is within a mixed-use neighborhood and would provide modern residences. The Project would not impact single-family neighborhoods.

Policy LU-1.3: Support the production of housing citywide that is affordable to lower-and moderate-income households consistent with the policies and targets set forth in the Housing Element.

Consistent: The Project, in addition to market rate units, also includes three (3) very-low-income units and three (3)moderate-income dwelling units, supporting the production of housing that is affordable to those households. The 2021-2029 Regional Housing Needs Assessment (as detailed in the Housing Element) identifies that the City is obligated to accommodate 4,166 very low income units and 8,999 above moderate-income units. The Project would assist the City in achieving its RHNA targets, as outlined in the Housing Element.

Policy LU-1.11: Promote future patterns of urban development and land use that reduce infrastructure construction costs and make better use of existing and planned public facilities.

Consistent: The residential development on Coast Street just south of Garden Grove Boulevard on a previously developed site constitutes infill development that would reduce infrastructure construction costs. Utility infrastructure already exists in the area, including stormwater, water, electricity, gas, cable, sewer, etc. As such, the Project would assist in reducing infrastructure construction costs and make use of existing and planned public facilities.

Goal LU-2: Stable, well-maintained residential neighborhoods in Garden Grove

Policy LU-2.1: Protect residential areas from the effects of potentially incompatible uses. Where new commercial or industrial development is allowed adjacent to residentially zoned districts, maintain standards

for circulation, noise, setbacks, buffer areas, landscaping, and architecture which ensure compatibility between the uses.

Consistent: The Project constitutes residential development in a residential zone and would not constitute industrial or commercial development, and there would be no threat to the protection of residential areas from potentially incompatible uses. The Project would include walls, setbacks, and landscaping, as well as architectural detailing to ensure compatibility with surrounding uses.

Policy LU-2.2: Strive to provide a diverse mix of housing types, along with uniformly high standards of residential property maintenance to preserve residents' real estate values and their high quality of life.

Consistent: The Project would provide high-quality new multi-family development with a mix of unit types for a variety of household sizes, and income levels. Further, the Project would provide adequate open space, new landscaping, and a variety of amenities that would preserve and enhance real estate values and a high quality of life.

Goal LU-3: Multi-Family Developments: Higher-density residential development along major thoroughfares and in areas well served by public transit, retail and service businesses, public services, and public gathering places.

Consistent: The Project would add residential units to an underutilized area near Garden Grove and Beach Boulevards. This housing is conveniently located near a variety of retail commercial uses that would support residential needs.

Policy LU-3.2: Support development of multi-family housing that provides a diversity of densities, types, and prices that meet the needs of all household income levels.

Consistent: The Project provides a mix of unit types (1-bedroom units, 2-bedroom units) that allow for a diversity in household types all within one building. In addition, three (3) dwelling units are designated very low-income-units and three (3) are designated as moderate-income, which allow for a diversity of incomes within one building.

Policy LU-3.3: Encourage developers to build housing projects at or maximum allowable densities.

Consistent: The Project provides 34 units, which isthe maximum allowable density, entitled by the State's Density Bonus Law while providing affordable housing to very-low-income and moderate-income families.

Goal LU-4: Land Use Compatibility: Uses compatible with one another.

Policy LU-4.1: Locate higher-density residential uses within proximity of commercial uses to encourage pedestrian traffic, and to provide a consumer base for commercial uses.

Consistent: The proposed Project would provide a higher-density residential use located just south of Garden Grove Boulevard, and just easterly of Beach Boulevard that is within walking distance to a variety of nearby stores, restaurants, and job sites. The residents of the site would provide a permanent customer base for nearby businesses.

Policy LU-4.4: Avoid intrusion of non-residential uses incompatible with established residential neighborhoods.

Consistent: The Project would develop new residences and does not involve new non-residential uses and is consistent with this policy in that it does not result in intrusion of non-residential uses incompatible with established residential neighborhoods.

Goal H-2: Affordable Housing: Housing supply to accommodate housing needs at all affordability levels.

Policy H-2.1: Expanding Affordable Housing. Preserve and expand the City's supply of affordable rental and ownership housing for lower-income households.

Consistent: The proposed Project would increase the supply of affordable housing for lower income households, as it includes three (3) dwelling units for very-low-income households and three (3) dwelling units for moderate-income households.

Goal H-3: Adequate Housing Sites: A range of available housing types, densities, and affordability levels to meet diverse community needs.

Policy H-3.6: Housing Near Transit. Encourage transit-oriented development consisting of higher residential densities, public gathering places, streetscape amenities, and commercial and entertainment uses within walking distance of planned rail stations and high-frequency bus stops.

Consistent: The Project would provide new higher density residential just south of Garden Grove Boulevard, a major thoroughfare with high frequency bus service. OCTA provides Route 56 bus service along Garden Grove Boulevard. Nearby Beach Boulevard, less than 0.25-mile walking distance, also has OCTA Route 29 bus service. The adjacency of commercial businesses also encourages walkability.

Policy H-3.7: Infill Housing. Encourage infill housing development that is compatible in character with established residential neighborhoods.

Consistent: The proposed Project consists of infill housing that is compatible in character with the established residential neighborhoods. There are existing multi-family dwelling units immediately to the south side of Emerson Avenue, as well as other multi-family residential uses in the surrounding neighborhood. The Project is compatible with and does not conflict with the multi-family residential uses in the area.

b. Criterion Section 15332(b): Project Location, Size, and Context: *The proposed development occurs within City limits on a Project site of no more than five acres substantially surrounded by urban uses.*

The Project is within the City limits of the City of Garden Grove, on an approximately 0.54-acre site. As shown in Figure 3 and detailed in Section 2.4, the site is surrounded by urban uses. Roadways are located to the west and south of the site, that are adjacent to parking lot and multi-family residential uses. Areas to the north and east of the site are developed with commercial uses. As the Project site is located within City limits, less than five acres and surrounded by urban uses, it meets the criteria of CEQA Guidelines Section 15332(b).

c. Criterion Section 15332(c): Endangered, Rare, or Threatened Species: *The Project site was determined to have no value as habitat for endangered, rare, or threatened species.*

The 0.54-acre Project site is developed with a vacant 3,252 square foot building, a parking area, driveway connection to Coast Street, and limited ornamental landscaping. The site is bound by existing walls along the north, east, and south sides of the site, and a sidewalk along Coast Street. The entire Project site has been disturbed by previous development and does not contain any sensitive habitat, endangered, rare, or threatened species or habitat that could support sensitive species. The Project site is located within an urban area. There are no California Department of Fish and Wildlife (CDFW), United States Army Corps of Engineers (USACE), or Regional Water Quality Control Board (RWQCB) jurisdictional waters within the Project site boundaries; and that the site does not contain any wetlands or vernal pools. Thus, no aquatic, riparian, or wetland related resources would be impacted by the proposed Project.

In addition, as a standard condition of approval, the Applicant is required to comply with Sections 3503, 3503.5, and 3513 of the California Fish and Game Code and the Migratory Bird Treaty Act (MBTA). Compliance with the California Fish and Game Code and MBTA would ensure that impacts to nesting birds and raptors, which may use vegetation including existing scattered non-native trees on or near the Project site for nesting during construction would not occur.

The proposed Project site has no value as habitat for endangered, rare, or threatened species and meets the criteria of CEQA Guidelines Section 15332(c).

d. Criterion Section 15332(d): Significant Effects: *Approval of the Project would not result in any significant effects relating to traffic, noise, air quality, or water quality.*

TRAFFIC

(a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Construction

The Circulation Element of the General Plan does not address construction. The *City of Garden Grove Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment* similarly does not address construction. Construction activities associated with the Project would generate vehicular trips from construction workers traveling to and from the Project site and delivery and hauling of construction supplies to, and debris and recyclable solid waste from, the Project site. The CalEEMod modeling completed for the Project (Appendix D) shows that the building construction phase would generate the most vehicular trips, with a total of 49 worker and 7 vendor trips per day. As shown in Table 2, *Construction Schedule*, CalEEMod defaults estimate that building construction would occur over 100 working days. Should all of the workers and vendors arrive and leave the site during the AM and PM peak hours, it would result in 28 trips per peak hour over those 100 work days of maximum construction activity.

The construction related trips would generally travel from SR-22 and the Beach Boulevard interchange, which provides direct access to Garden Grove Boulevard that intersects with Coast Street approximately 0.15-mile to the east. Direct access from the freeway and arterial streets to the site would provide for efficient construction trips on existing roadway facilities. Impacts would be less than significant.

Operation

Roadway Facilities. The Circulation Element provides the following roadway related goal and policies that are applicable to the Project:

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

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

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

As shown below, with the minimal number of Project trips during peak hour and daily, direct access from the freeway and arterial streets to the site would provide for efficient operational trips on existing roadway facilities. Further, the Project would widen the existing alley from 20 feet to 25 feet for enhanced Fire Department access, thereby maintaining a balance among mobility, safety, cost efficiency of maintenance, and the quality of the City's environment. In addition, the Project provides for a balance of land uses by providing housing in an area with commercial, office, and service uses. Likewise, the Project supports a reduction in miles traveled by providing residences in areas with employment. Thus, the Project is consistent with the roadway goal and policies, as further detailed below.

The Project proposes the removal of the existing 3,252 square foot building and redevelopment of the site with 34 multi-family residences. A Project trip generation was prepared using trip rates from the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, 11th Edition (2021) for Multi- Family Housing Low-Rise (ITE Land Use Code 220). As shown in Table T-1, the proposed 34 residential units are forecast to generate 229 daily vehicle trips, 13 a.m. and 17 p.m. peak hour vehicle trips.

Table T-1: Project Trip Generation

				AM Peak Hour			PM Peak Hour		
Land Use	**Units**	**Daily**	**In**	**Out**	**Total**	**In**	**Out**	**Total**
Project Trip Rate								
Multifamily Housing (Low-Rise)[1]	DU	6.74	0.10	0.30	0.40	0.32	0.19	0.51
Proposed Project Trip Generation								
Multifamily Housing (Low-Rise) [1] 34	DU	229	3	10	13	11	6	17
Total Trip Generation		**229**	**3**	**10**	**13**	**11**	**6**	**17**

[1] Trip Generation & Vehicle Mix Source: Institute of Transportation Engineers (ITE), *Trip Generation Manual*, Eleventh Edition (2021). Source: *LOS Analysis Screening Analysis*, Appendix A.

Direct access from the freeway and arterial streets to the site would provide for efficient operational trips on existing roadway facilities. Further, the City's development review and permitting process would ensure that would not have the potential to result in any conflicts with a program, plan, ordinance, or policy addressing the circulation system. Impacts would be less than significant.

Pedestrian Facilities. The Circulation Element of the General Plan provides the following goal and policy that is applicable to the Project regarding pedestrian facilities:

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

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

The Project would provide a sidewalk fronting the Project site along Coast Street. Direct pedestrian access would be provided, as well as landscaping to enhance the aesthetic quality in front of the Project site.

Sidewalks currently exist on both sides of Coast Street in front of the Project site and along Garden Grove Boulevard. The proposed Project would provide for pedestrian circulation by constructing new onsite sidewalks and pathways that would provide pedestrian access to the onsite open space areas and connect to the existing offsite sidewalks along Coast Street. The Project would provide onsite pedestrian circulation to facilitate use of the existing offsite sidewalks; and therefore, potential impacts related to pedestrian facilities or a conflict with any program, plan, ordinance, or policy related to provision of pedestrian facilities would not occur.

Bicycle Facilities. The Circulation of the General Plan provides the following goal and policy that is applicable to the Project regarding bicycle facilities:

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

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

While there is no existing bicycle lane located along either Coast Street or Garden Grove Boulevard, the Project does not involve changes to the existing bicycle lanes. However, it includes installation of bicycle racks for use to encourage bicycle transportation. As a result, the Project would not result in conflict related to bicycle circulation or policies related to bicycle facilities.

Transit Service. The Circulation of the General Plan provides the following goal and policy that is applicable to the Project regarding transit service:

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

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

Given the Project's convenient location near high-quality transit, the Project would further increase awareness and use of alternate forms of transportation in the City. Transit service within the City is provided by the Orange County Transportation Authority (OCTA). Bus Route 56 provides service along Garden Grove Boulevard, Bus Route 29 provides services along Beach Boulevard, and OC Bus Rapid Route 529 provides services along Beach Boulevard between the Goldenwest Transportation Center and the Fullerton Park and Ride Metro Station. The existing bus services would provide efficient transportation to and from the site for residents and visitors and has the potential to reduce vehicle miles traveled. In addition, because the Project is located along existing bus routes and within an existing mixed-use area the Project is consistent with providing new residential in areas served by transit, which is consistent with regionwide policies related to addressing the circulation system. Overall, impacts related to transit services would not occur as a result of the implementation of the proposed Project.

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

CEQA Guidelines Section 15064.3 - Determining the Significance of Transportation Impacts, provides lead agencies with the discretion to choose the most appropriate methodology and thresholds for evaluating VMT. The City of Garden Grove Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service

Assessment provides screening thresholds to identify projects that would be presumed to have a less than significant impact on VMT, which include being within a Transit Priority Area, being within a low traffic analysis zone (TAZ), or being a local-serving project.

A VMT Screening Analysis for the Project was prepared and is included as Appendix B, and the Project's consistency with these screening thresholds is detailed below.

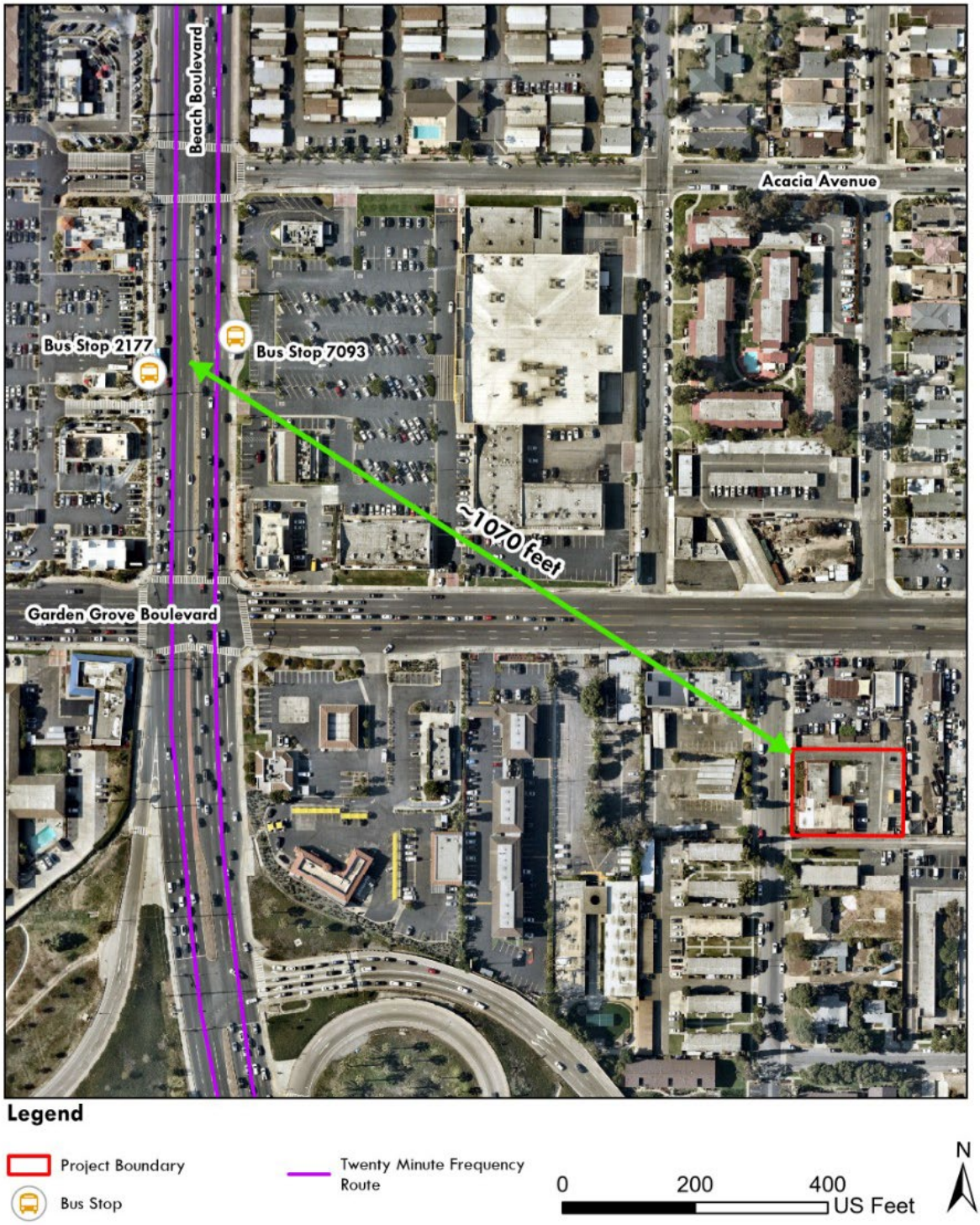
Transit Priority Area. The City's VMT screening thresholds identify that projects in a Transit Priority Area (TPA), which are locations within 0.5 mile of an existing major transit stop (an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods) or an existing stop along a high-quality transit corridor would have a less than significant impact on VMT. However, the City guidelines state that the project may not meet the screening threshold if the following project or location specific criteria are not met:

- Has a Floor Area Ratio (FAR) of less than 0.75;
- Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking);
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization); or
- Replaces affordable residential units with a smaller number of moderate or high-income residential units.

The Project site is located approximately 1,070 feet (0.2 miles) from Bus Stops IDs 7093 and 2177, which are served by Orange County Transportation Authority (OCTA) Routes 29 and 529. These routes operate at 20-minute or better headways during weekday peak periods (6:00–9:00 a.m. and 3:00–7:00 p.m.). Based on the service frequency and proximity to transit, the Project site is located within a Transit Priority Area (TPA), as shown in Figure T-1. The proposed building would have a total net floor area of 42,594 SF on the approximately 23,494 SF Project site, which would result in a FAR of 1.81 that would exceed 0.75. With the lower parking ratios of State Density Bonus Law applied, the proposed Project does not include excess parking, as it includes a total of 45 onsite parking spaces for 34 residential units, which is the minimum required per State Density Bonus Government Code Section 65915(p)(4).

The proposed Project is consistent with the SCAG Connect SoCal 2024 Regional Transportation Plan/Sustainable Communities Strategy that provides for infill and redevelopment of higher density residential uses within mixed-use areas that are served by transit (Connect SoCAL 2024 pages 116-117). Connect SoCal 2024 Policy 32 promotes the growth of origins and destinations, with a focus on future housing and population growth, in areas with existing and planned urban infrastructure that includes transit and utilities. The Project is consistent with this policy as it provides new housing and population in an urban area with infrastructure, transit, and utilities. Connect SoCal 2024 Policy 36 encourages housing development in transit-supportive and walkable areas (such as the Project area, which is walkable to retail commercial uses and bus service) to create more interconnected and resilient communities. Connect SoCal 2024 Policy 42 promotes 15-minute communities as places with a mix of complementary land uses and accessible mobility options where residents can either access their most basic, day-to-day needs within a 15-minute walk, bike ride or roll from their home or as places that result in fewer and shorter trips because of the proximity of complementary land uses, which is consistent with the complementary residential and commercial uses in the Project vicinity. Residents at the

Figure T-1: Transit Priority Area Screening



Project site would be within a 15-minute walk or bike ride to restaurants, retail, services and other complementary uses that would provide for fewer and shorter trips. In addition, the Project provides affordable residential units on a site that was previously not used for affordable housing. Therefore, the Project meets the Transit Priority Area screening criteria, and impacts would be less than significant.

Low VMT Traffic Analysis Zone. The City's VMT screening thresholds identify that projects in a low VMT TAZ would have a less than significant impact on VMT. Per the City of Garden Grove Traffic Impact Analysis Guidelines for VMT and Level of Service Assessment, projects located in Zone 1 areas are identified as areas that have a low VMT. Thus, projects within these areas can be presumed not to have a significant VMT impact and can be screened from VMT analysis.

As shown in Figure T-2 *Low VMT Generating Traffic Analysis Zones*, the Project site is located in Zone 1 that has been identified as having a VMT that is lower than the VMT threshold. Thus, the Project meets the low TAZ screening criteria, and impacts would be less than significant.

Local Serving Projects. The City's VMT screening thresholds identify that "local-serving retail development tends to shorten trips and reduce VMT." The screening thresholds specify that retail development includes stores smaller than 50,000 square feet, such as gas stations, banks, restaurants, and shopping centers. The proposed Project is a residential development and would not qualify as locally serving. Therefore, Screening Criteria 3 is not met.

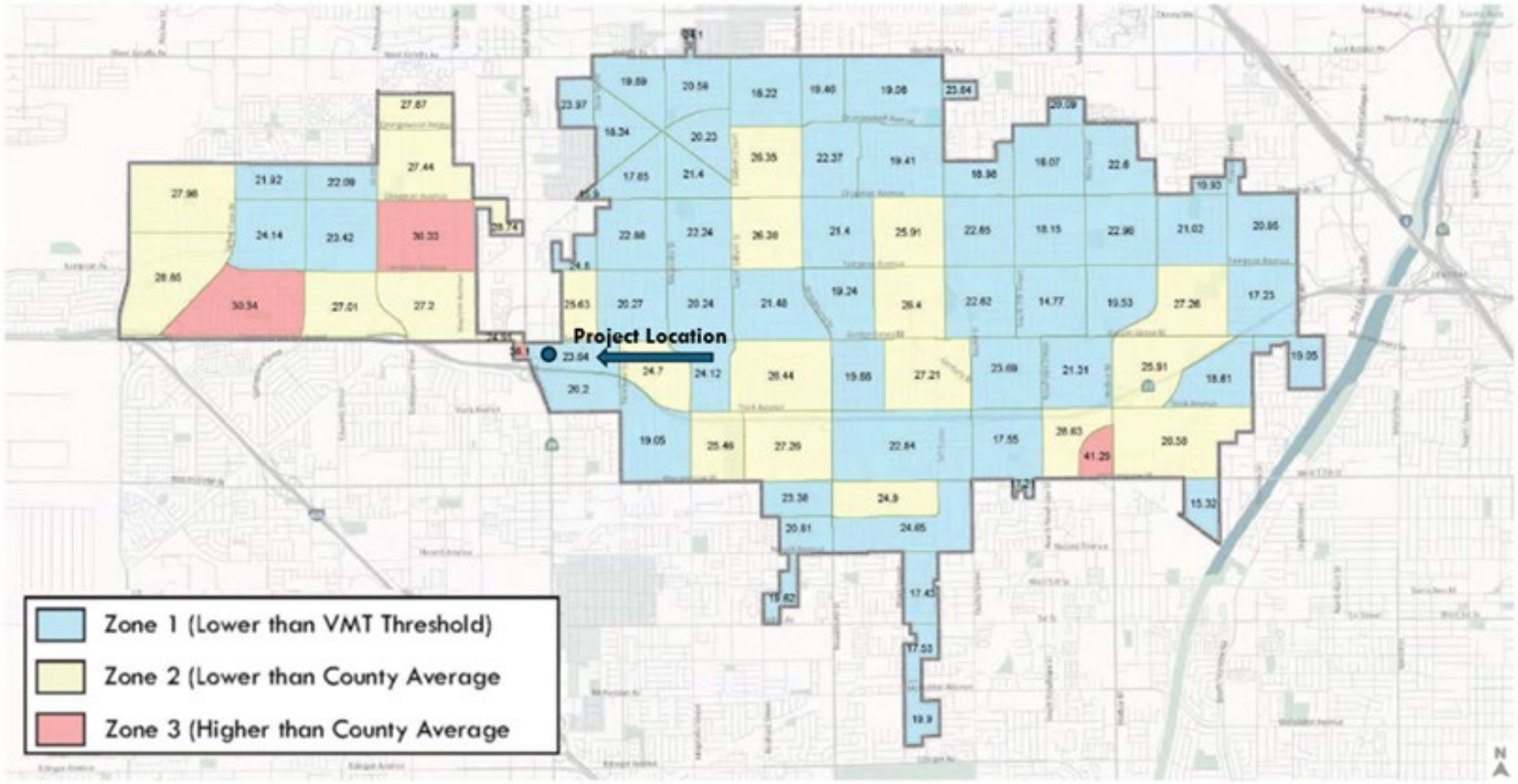
Overall, because the Project is located both within a Transit Priority Area and within a low VMT TAZ, it meets the City's VMT screening criteria, and the Project would result in a less than significant impact related to VMT.

(c) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The Project includes development of residences, open space, recreation, and circulation and parking. The Project includes only residential uses and does not include any incompatible uses, such as farm equipment.

The proposed Project site would be accessed from Coast Street through a 30-foot-wide driveway and by a 25-foot-wide alley on the south side of the proposed building. Onsite vehicular circulation would be provided by a drive isle that would be a minimum of 25 feet in width, which is consistent with City circulation safety design standards. Pedestrian circulation would be provided by an onsite sidewalk that would link the proposed residential areas and the existing offsite sidewalk along Coast Street. The Project would not increase any hazards related to a design feature. The City's construction permitting process includes review of project plans to ensure that no potentially hazardous transportation design features would be introduced by the Project. For example, the onsite circulation plan has been reviewed and approved by OCFA to ensure fire engine accessibility and turn around area is provided to the fire code standards. As a result, impacts related to vehicular circulation design features would not occur.

Figure T-2: Low VMT Generating Traffic Analysis Zone



Orange County Average VMT/SP: 29.01

(d) Result in inadequate emergency access?

Construction

The proposed construction activities, including equipment and supply staging and storage, would occur within the Project site, and therefore would not require roadway lane closures that could restrict access of emergency vehicles to the Project site or adjacent areas. The installation of new driveways and connections to existing infrastructure systems that would be implemented during construction of the proposed Project would not require closure of Coast Street. Any temporary lane closures needed for utility connections or driveway access construction would be implemented consistent with the recommendations of the California Joint Utility Traffic Control Manual (Caltrans 2014), as incorporated into a Traffic Management Plan for the Project that the City requires for receipt of construction permits. The Traffic Management Plan would include designated haul routes, temporary traffic control devices, travel time restrictions, and other elements determined through the construction review and permitting process by the City's Public Works Division that would ensure that substantial traffic queuing along Coast Street would not occur, and that all construction equipment would be staged on site. Thus, implementation of the Project through the City's permitting process would ensure existing regulations are adhered to and that potential construction related emergency access impacts would not occur.

Operation

Operation of the Project would also not result in inadequate emergency access. The Project driveway and internal access would be required through the City's permitting procedures to meet the City's design standards and provides adequate turning space for passenger cars, fire trucks, and delivery trucks. The Project is also required to provide fire suppression facilities that meet OCFA and City requirements. The Project provides a 25-foot-wide alley on the south side of the proposed building for OCFA fire access. Also, measures that the Project provides per the Orange County Fire Authority Master Plan for Residential Development include a red curb fire lane; fire lane entrance sign; fire lane no parking sign; installation of building address with six inch minimum lettering; pedestrian gate with knox box device; fire rated interior exit stairway with roof access; exterior level courtyard open to the sky; installation of wet standpipe; installation of sprinklers; and ground ladder access to level three units and above. The City would review the development plans as part of the permitting procedures to ensure adequate emergency access pursuant to the requirements in Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9), included in GGMC Chapter 18.04 and as amended in Chapter 18.16. As a result, impacts related to inadequate emergency access would not occur.

The proposed Project would not result in any significant effects relating to traffic; therefore, the proposed Project meets the traffic related criteria of CEQA Guidelines Section 15332(d).

NOISE

A Noise Impact Analysis (Appendix C) was prepared for the proposed Project to assess the project's potential noise and vibration related impacts. The following analysis incorporates information from the study.

Noise Terminology

- **Leq:** The equivalent sound level, which is used to describe noise over a specified period of time, typically 1-hour, in terms of a single numerical value. The Leq of a time-varying signal and that of a steady signal are the same if they deliver the same acoustic energy over a given time. The Leq may also be referred to as the average sound level.
- **Lmax:** The instantaneous maximum noise level experienced during a given period of time.

- **Lmin:** The instantaneous minimum noise level experienced during a given period of time.
- **CNEL:** The Community Noise Equivalent Level, which, similar to the Ldn, is the average A-weighted noise level during a 24-hour day that is obtained after an addition of 5 dBA to measured noise levels between the hours of 7:00 pm to 10:00 pm and after an addition of 10 dBA to noise levels between the hours of 10:00 pm to 7:00 am to account for noise sensitivity in the evening and nighttime, respectively.
- **Ambient Noise:** The "ambient noise level" is the background noise level associated with a given environment at a specified time and is usually a composite of sound from many sources from many directions.

Noise Regulations

State Law
An interior CNEL of 45 dB is mandated by the State of California Noise Insulation Standards (CCR, Title 24, Part 6, Section T25-28) for residential dwellings and hotel and motel rooms. Conventional construction practices, with closed windows and fresh air supply systems or air conditioning normally suffice.

City of Garden Grove General Plan Noise Element
The City's General Plan Noise Element includes a compatibility matrix (Table 7-1) to determine if new land uses are compatible with the existing noise environment. The table identifies noise environments that are less than 60 dBA CNEL to be normally compatible with low density and single-family residential uses; and noise environments that are less than 65 dBA CNEL to be normally compatible with multiple family development, such as the proposed Project. Specific Noise Element Goals and Policies are listed and analyzed later in this section.

Garden Grove Municipal Code
GGMC Section 8.47.040 outlines the City's exterior noise limits as it relates to stationary noise sources. The residential limits are listed below:

- Residential Uses: 55 dBA between 7:00 a.m. and 10:00 p.m.
  50 dBA between 10:00 p.m. and 7:00 a.m.

GGMC Section 8.47.050(C) states that the following criteria be used whenever the ambient noise level exceeds the City's standards:

1. The noise standard for a cumulative period of more than 30 minutes in any hour;
2. The noise standard plus five (5) dB(A) for a cumulative period of more than 15 minutes in any hour;
3. The noise standard plus 10 dB(A) for a cumulative period of more than five minutes in any hour;
4. The noise standard plus 15 dB(A) for a cumulative period of more than one minute in any hour; or
5. The noise standard plus 20 dB(A) for any period of time.

GGMC Section 8.47.060(d) Construction of Buildings and Projects, states that it is unlawful for any person within a residential area, or within a radius of 500 feet therefrom, to operate equipment or perform any outside construction or repair work on buildings, structures, or projects, or to operate any pile driver, power shovel, pneumatic hammer, derrick, power hoist, or any other construction type device between the hour of 10:00 p.m. of one day and 7:00 a.m. of the next day in such a manner that a person of normal sensitiveness, as determined utilizing the criteria established in GGMC Section 8.47.050(b), is caused discomfort or annoyance unless such operations are of an emergency nature.

Should the City's noise ordinance be amended, subject to vested rights applicable to the Project pursuant to SB 330, the proposed Project would be required to comply with the revised regulations that would be ensured by the City through the development review and permitting process.

Federal Transit Administration

The FTA *Transit Noise and Vibration Impact Assessment* (2018) provides construction noise criteria to determine if the project would create a substantial temporary noise increase to the nearby sensitive receptors. The Manual provides different criteria options and states that project construction noise criteria should account for the existing noise environment, the absolute noise levels during construction activities, the duration of the construction, and the adjacent land use. Based on the FTA criteria for a detailed construction assessment, the residential threshold of 80 dBA Leq during the daytime and 70 dBA Leq during the nighttime is applied.

The FTA *Transit Noise and Vibration Impact Assessment* also provides thresholds for increases in ambient noise from vehicular traffic based on increases to ambient noise. An impact would occur if existing noise levels at noise-sensitive land uses (e.g. residential, etc.) are less than 60 dBA Ldn and the project creates an increase of 3 dBA or greater project-related noise level increase; or if existing noise levels range from 60 to 65 dBA Ldn and the project creates 2 dBA or greater noise level increase. Noise level increase of 1 dBA or less would not result in an impact.

The FTA *Transit Noise and Vibration Impact Assessment* guidelines are also used as a screening tool for assessing the potential for adverse vibration effects. The FTA Manual details that a vibration level of up to 0.20 in/sec in PPV is considered safe for non-engineered timber and masonry buildings and would not result in any construction vibration damage. Engineered concrete and masonry buildings are considered safe up to a vibration level of 0.30 in/sec PPV, and reinforced buildings are considered safe up to a vibration level of 0.50 in/sec PPV. To be conservative, the 0.20 in/sec PPV threshold has been used to evaluate potential vibration impacts at the nearest structures to the site. The FTA Manual also provides criteria for human annoyance from vibration. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time, which the FTA considers to be approximately 75 VdB (velocity decibels).

Sensitive Receivers

Noise sensitive receivers are defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect the use of the land, including: residences, schools, hospitals, churches, libraries, and recreation areas. The closest noise sensitive receptors to the Project site are the existing residences that are approximately 48 to 50 feet south of the Project site boundary, as shown on Figure N-1.

Existing Ambient Noise Levels

To document existing ambient noise levels at existing sensitive receptors in the Project area, three 15-minute daytime noise measurements were taken on August 28, 2024 and one long-term 24-hour noise measurement was taken from August 28, 2024, to August 29, 2024. Figure N-1 shows the noise measurement locations and Table N-1 identifies that existing noise levels are 60.0 dBA CNEL and 62.7 dBA CNEL. The dominant noise source is vehicle traffic associated with the SR-22 freeway and Garden Grove Boulevard.

Table N-1: Existing Ambient Noise Measurement Summary (dBA)

Site No.	Site Description	Average (dBA L_{eq})	Maximum (dBA L_{max})	(dBA $L_{eq\ 1\text{-}hour}$/Time)		Average (dBA CNEL)
				Minimum	Maximum	
1	Located near the southeast corner of the Project site, approximately 30 feet north of the public alley centerline and 20 feet west of the east property line.	56.8	85.4	42.9 2:54 a.m.	61.1 6:27 p.m.	60.0
2	Located on the north property line fence, approximately 50 feet east of Coast Street centerline.	59.0	90.1	45.4 2:42 a.m.	63.0 10:25 a.m.	62.7

Source: Noise Impact Analysis, Appendix C.

(a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction

Noise generated by construction equipment would include a combination of trucks, power tools, concrete mixers, and portable generators that when combined can reach high noise levels. Construction is expected to occur in the following stages that would not overlap: demolition, site preparation, grading, building construction, architectural coating, paving. Noise levels generated by heavy construction equipment can range from approximately 77 dBA to 90 dBA when measured at 50 feet, as shown on Table N-2.

The GGMC Section 8.47.060(d) allows construction noise to exceed the City noise standards provided that construction activities occur between specific days and hours within 500 feet of a residential area. The proposed Project's construction activities would occur pursuant to these regulations, as conditioned through the permitting process. The GGMC does not include construction related noise level standards; therefore, the FTA construction noise criteria thresholds are used.

Figure N-1: Noise Measurement Locations

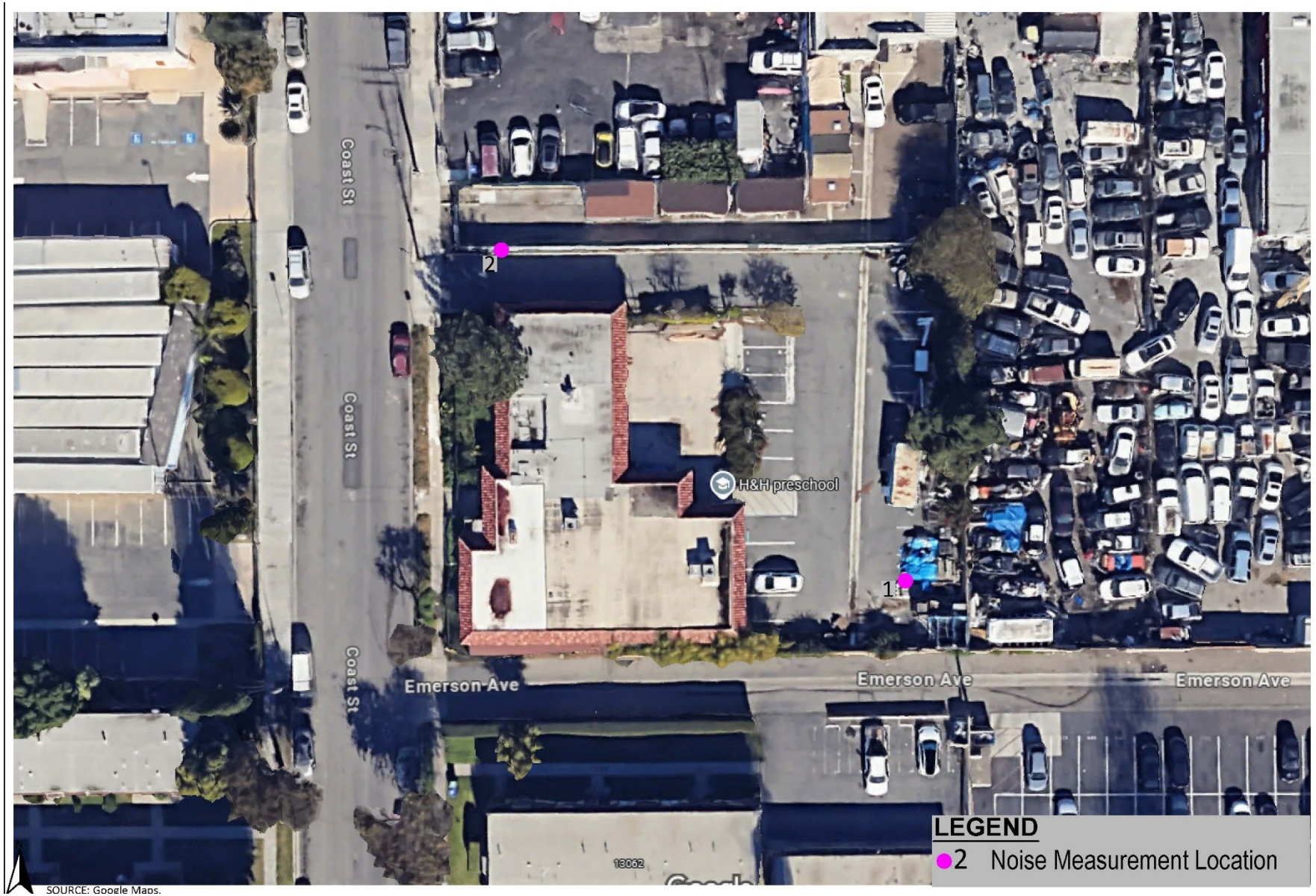


Table N-2: Construction Reference Noise Levels

Equipment	Number of Equipment	Acoustical Use Factor[1] (percent)	Spec 721.560 Lmax at 50 feet[2] (dBA, slow[3])	Actual Measured Lmax at 50 feet[4] (dBA, slow[3])
Demolition				
Concrete/Industrial Saw	1	20	90	90
Rubber Tired Dozer	1	40	85	82
Front End Loader	1	40	80	79
Tractor	1	40	84	N/A
Site Preparation				
Grader	1	40	85	83
Tractor	1	40	84	N/A
Grading				
Grader	1	40	85	83
Rubber Tired Dozer	1	40	85	82
Tractor	2	40	84	N/A
Building Construction				
Crane	1	16	85	81
Forklift (Gradall)	1	40	85	83
Generator	1	50	82	81
Tractor	1	40	84	N/A
Welder	3	40	73	74
Paving				
Cement and Mortar Mixer	1	40	85	79
Paver	1	50	85	77
Rollers	1	20	85	80
Tractor	1	40	84	N/A
Architectural Coating				
Air Compressor	1	40	80	78

Source: Noise Impact Analysis, Appendix C.
Notes:
[1] Acoustical use factor is the percentage of time each piece of equipment is operational during a typical workday.
[2] Spec 721.560 is the equipment noise level utilized by the RCNM program.
[3] The "slow" response averages sound levels over 1-second increments. A "fast" response averages sound levels over 0.125-second increments.
[4] Actual Measured is the average noise level measured of each piece of equipment during the Central Artery/Tunnel project in Boston, Massachusetts primarily during the 1990s.

The construction noise from the proposed Project would occur over a 6-month period (per CalEEMod default estimates) and would be temporary in nature as the operation of each piece of construction equipment would not be constant throughout the construction day, and equipment would be turned off when not in use. During operation of construction equipment, power levels vary between one or two minutes of full power operation followed by three or four minutes at lower power settings which results in a range of noise levels.

For each phase of construction, the construction equipment was analyzed based on being placed in the middle of the Project site, per the FTA Manual for a General Assessment, and is based on the rationale that mobile equipment would likely move around the entire Project site in a typical workday. As such, the middle of Project

site would provide the acoustical average noise level created over a typical workday. Also, the two nosiest pieces of equipment were evaluated for each construction phase, as recommended by the FTA Manual.

As shown on Table N-3, construction noise at the closest residences would range from 66 to 77 dBA Leq, which would not exceed the 80 dBA Leq threshold during the daytime for residential uses. Thus, impacts would be less than significant. The analyzed phases of construction would occur sequentially; however, it should be noted that due to the logarithmic properties of the addition of two distinct noise sources, the most that the noise may be increased if two construction phases occurred concurrently (which is not proposed or anticipated) would be an additional 3 dB above the higher construction phase noise (Appendix C). As such, the worst-case noise level if two construction phases occurring simultaneously, which is not reasonably foreseeable as it is not proposed or part of typical construction operations, would be 80 dBA Leq at the closest sensitive receptor, which would not exceed the FTA construction noise standard of 80 dBA. Therefore, construction noise impacts would be less than significant.

Table N-3: Project Construction Noise Levels at Nearest Sensitive Receivers

	Construction Noise Level (dBA Leq) at:
Construction Phase	**Closest Homes to South**
Demolition	77
Site Preparation	76
Grading	76
Building Construction	75
Paving	73
Painting	66
FTA Construction Noise Threshold	**80**
Exceed Threshold?	**No**

Source: Noise Impact Analysis, Appendix C.

Operation Noise Impacts

Traffic Noise. As shown in Table T-1, the proposed 34 residential units are forecast to generate 229 daily vehicle trips, 13 a.m. and 17 p.m. peak hour vehicle trips. According to the City's Focused General Plan Update and Zoning Amendments Draft EIR, Garden Grove Boulevard, west of Dale Street had 26,158 daily trips in the year 2020, with operation of the existing onsite building. Not including the reduction in vehicles from removal of the existing onsite building, the proposed Project would contribute up to 0.9 percent of the daily trips on Garden Grove Boulevard. In order for project-generated vehicular traffic to increase the noise level on any of the nearby roadways by 3 dB (the human threshold of perception), the daily trips would have to double, or by 1.5 dB, the daily trips would have to increase by 50 percent. As such, the proposed Project's roadway noise impacts would be less than significant.

Onsite Noise. The Noise Impact Study modeled the onsite noise that would be generated by operation of the Project, including noise from vehicle parking and loading areas, and air conditioning units. A majority of vehicular parking would be located in a parking garage on the ground level of the residential structure. An additional nine vehicle parking spaces would be accessed off the alley on the south side of the proposed building. Parking lots generate noise from vehicle engines, car doors being slammed, people talking, and various similar activities that average approximately 52.1 dBA at 5 feet. However, the proposed parking is mostly located within the parking garage and adjacent to a proposed 6-foot-high CMU wall that would shield

noise; thus, the parking lot noise at the closest residence would be 23 dBA (as shown on Table N-4), which would not exceed the City's daytime residential noise standard of 55 dBA or nighttime residential noise standard of 50 dBA. Therefore, the proposed parking areas would not result in noise impacts to existing offsite sensitive receptors.

The typical residential air conditioning systems (such as the 2.5-ton Carrier Model No: CA15NA03-0-A and a 3 ton Carrier Model No: CA15NA036-0-A) produce a noise level of 73 dBA at one meter. Noise modeling was conducted including the noise reduction provided by the proposed 6-foot-high CMU wall on the north property line, 4-foot-high wall on the perimeter of the second-floor common open space area, and 3.5-foot-high parapet wall on the roof, to determine the noise from air conditioning units at the closest residences. As shown in Table N-4, the air conditioning noise levels at the residences adjacent to the south of the site could reach 26 dBA, which would not exceed the City's daytime residential noise standard of 55 dBA or nighttime residential noise standard of 50 dBA. Therefore, the proposed air conditioning units would not result in noise impacts to existing offsite sensitive receptors.

Table N-4 shows that the proposed Project's worst-case operational noise from the simultaneous operation of all noise sources on the Project site would create a noise level of 27 dBA at the residences to the south side of the Project site. The worst-case operational noise level of 27 dBA would be below both the City's daytime residential noise standard of 55 dBA and nighttime residential noise standard of 50 dBA. In addition, it is below the existing ambient noise levels of 60 dBA, would not increase ambient noise levels, and would not be heard above existing ambient noise at existing sensitive receptors. Therefore, the onsite operational noise impacts would be less than significant.

Table N-4: Project Operational Noise Levels At Nearest Sensitive Noise Receptors

Noise Source	Homes to the South
Air Conditioning Compressor Units[1]	26
Parking Lot[2]	17
Combined Noise Level	**27**
City Noise Standard[3] (Day/Night)	55/50
Exceed Standard (Day/Night)?	**No/No**

Source: Noise Impact Analysis, Appendix C.

In addition, the Noise Element includes the following goal and policies, which are related to the Project. As detailed below, the Project is consistent with the Noise Element goal and policies:

Goal N-1: Noise considerations must be incorporated into land use planning decisions.

Consistent: Noise considerations have been incorporated into the Project as the Project would be consistent with adjacent residential uses and would not result in an impact on nearby uses, as detailed previously.

Policy N-1.3: Require noise reduction techniques in site planning, architectural design, and construction, where noise reduction is necessary consistent with the standards in Tables 7-1 and 7-2 (refer to Table 2 and Table 3, Garden Grove Noise Ordinance Standards, respectively), Title 24 of the California Code of Regulations, and Section 8.47 of the Municipal Code.

Consistent: As detailed previously in Tables N-3 and N-4 the Project would be consistent with the City's noise standards. Title 24 and municipal code requirements would be ensured through the City's development permitting process.

Policy N-1.4: Ensure acceptable noise levels are maintained near schools, hospitals, convalescent homes, churches, and other noise sensitive areas.

Consistent: As detailed previously in Tables N-3 and N-4 the Project would be consistent with the City's noise standards and would result in acceptable noise levels near noise sensitive uses.

Policy N-IMP-1B: Require that new commercial, industrial, any redevelopment projects, or any proposed development near existing residential land use demonstrate compliance with the City's Noise Ordinance prior to approval of the project.

Consistent: As detailed previously in Tables N-3 and N-4 the Project would be consistent with the City's Noise Ordinance.

Policy N-IMP-1D: Require construction activity to comply with the limits established in the City's Noise Ordinance.

Consistent: As detailed previously, the construction limits established in the City's Noise Ordinance, as adopted at the time of construction permitting, would be ensured through the City's development permitting process.

Policy N-IMP-1E: Require buffers or appropriate mitigation of potential noise sources on noise sensitive areas.

Consistent: As detailed previously in Tables N-3 and N-4 the Project would be consistent with the City's noise standards and would not result in noise impacts on noise sensitive areas. Therefore, noise buffers and mitigation are not required.

Policy N-IMP-1K: Enforce the Noise Ordinance to ensure that stationary noise and noise emanating from construction activities, private development, and/or special events are minimized.

Consistent: As detailed previously in Tables N-3 and N-4 the Project would be consistent with the City's noise standards. In addition, Title 24 and municipal code requirements would be ensured through the City's development permitting process.

(b) Generation of excessive groundborne vibration or groundborne noise levels?

Construction Vibration. Construction activities for development of the Project would include excavation and grading, which have the potential to generate low levels of groundborne vibration. People residing in close proximity to the construction could be exposed to the generation of excessive groundborne vibration or groundborne noise levels related to construction activities. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels.

The City does not have adopted thresholds related to vibration. However, the FTA *Transit Noise and Vibration Impact Assessment* provides numeric thresholds for vibration impacts for building damage and human annoyance. The threshold for vibrations related to building damage is 0.20 PPV for non-engineered timber and masonry buildings and the threshold for human annoyance is 75 Vdb.

As shown in Table N-5, loaded trucks generate 0.076 in/sec PPV, jackhammers generate 0.035 PPV, and operation of a small bulldozer generates 0.003 PPV at a distance of 25 feet. Groundborne vibration associated with this equipment drops off as the equipment moves away. It should be noted that these vibration levels are reference levels and may vary slightly depending upon soil type and specific usage of each piece of equipment.

Table N-5: Construction Equipment Vibration Source Levels

Equipment	PPV at 25 ft, in/sec	Approximate Vdb at 25 ft
Loaded Trucks	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58

Source: Noise Impact Analysis, Appendix C.

The construction equipment and usage for the Project is detailed previously in Table 3, *Construction Schedule*, The primary source of vibration during construction of the proposed Project as listed in Table 3 would be from the operation of a small rubber tired bulldozer. From Table N-5 above a small bulldozer would create a vibration level of 0.003 inch per second PPV (or 58 Vdb) at 25 feet. Based on typical propagation rates identified by the FTA, the vibration level at the nearest off-site residences (48 feet to 50 feet to the south of the Project site boundary) would be 0.001 inch per second PPV (or 52 Vdb), which is below the 0.20 inch per second PPV threshold for damage to non-engineered timber and masonry buildings and below the human annoyance threshold of 75 VdB. In addition, the heavy construction equipment would be used for a limited time during the construction period, as detailed in Table 3. As shown in the Noise Impact Analysis (Appendix C), and as described in the Project Description, no vibratory rollers would be used for construction of the Project. Therefore, construction-related vibration impacts would be less than significant.

Operation

Operation of the proposed residences would include heavy trucks for residents moving in and out of the units and garbage trucks for solid waste disposal. Truck vibration levels are dependent on vehicle characteristics, load, speed, and pavement conditions. However, as shown on Table N-7, vibration levels from loaded trucks generate 0.076 inch per second PPV. Truck movements on site would be travelling at very low speed, so it is expected that truck vibration at nearby sensitive receptors would be less than 0.076 inch per second PPV, which is less than the structure damage threshold of 0.5 inch per second PPV threshold and the human annoyance threshold of 0.24 inch per second PPV. Therefore, operational vibration impacts would be less than significant.

(c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The Project site is not located within an airport land use plan or within 2 miles of an airport. The closest air facility is the Los Alamitos Joint Forces Training Base, located approximately 3.19 miles northwest of the Project site. The closest public airport to the project site is John Wayne Airport, which is located over 9 miles to the southeast of the Project site. In addition, the Fullerton Municipal Airport is located over 6 miles to the north of the site. Therefore, the Project would not result in excessive noise levels related to airports, and no impacts would occur.

Overall, the proposed Project would not result in any significant effects relating to noise or vibration; therefore, the proposed Project meets the noise related criteria of CEQA Guidelines Section 15332(d).

AIR QUALITY

This section is based on the Air Quality Impact Analysis prepared for the proposed Project that is provided in Appendix D. The Project's construction and operational emissions were calculated using the California Emissions Estimator Model (CalEEMod) Version 2022.1.1.20 pursuant to the South Coast Air Quality Management District (SCAQMD) methodology criteria.

(a) Conflict with or obstruct implementation of the applicable air quality plan?

The Project site is located in the South Coast Air Basin, which is under the jurisdictional boundaries of the SCAQMD. The SCAQMD and Southern California Association of Governments (SCAG) are responsible for preparing the Air Quality Management Plan (AQMP), which addresses federal and state Clean Air Act (CAA) requirements. The AQMP details goals, policies, and programs for improving air quality in the Basin. In preparation of the AQMP, SCAQMD and SCAG use land use designations contained in General Plan documents to forecast, inventory, and allocate regional emissions from land use and development-related sources.

As described in Chapter 12, Section 12.2 and Section 12.3 of the SCAQMD's CEQA Air Quality Handbook (1993), for purposes of analyzing consistency with the AQMP, if a project would have a development density and vehicle trip generation that is substantially greater than what was anticipated in the General Plan, then the project would conflict with the AQMP. On the other hand, if a project's density is consistent with the General Plan, its emissions would be consistent with the assumptions in the AQMP, and the project would not conflict with the AQMP. In addition, the SCAQMD considers projects consistent with the AQMP if the project would not result in an increase in the frequency or severity of existing air quality violations or cause a new violation.

The Project site has a General Plan land use designation of Medium Density Residential (MDR) that allows residential development at a range from 21.1 to 32.0 dwelling units per acre. However, the proposed Project includes three units restricted for very-low income households that provide a 50 percent (50%) density bonus, and three units restricted for moderate-income households. that provides an additional 38.75 percent (38.75%) density bonus that would result in a density of 68 units per net acre. Thus, the proposed Project would be within the allowable density with application of the density bonus, which would provide for housing as required by the City's Regional Housing Needs Allocation (RHNA) that allocated 19,168 new housing units for the 2021-2029 planning period.[2] The California Department of Finance estimated that the City had a vacancy rate of 2.5% in 2024[3] and as of 2024, 639 new permits have been issued toward meeting the RHNA target of 19,168 new housing units.[6] Thus, the 34 residential units provided by the Project (including three very-low-income affordable units and three moderate-income affordable units) would be within housing growth projections, and the Project would not conflict with the AQMP.

Additionally, as detailed previously and shown on Figure T-1, the Project site is located within a TPA, which are areas within 0.5-mile of a transit stop or a transit corridor with 20-minute or less service frequency during peak commute hours. The provision of higher density housing within TPAs is consistent with the AQMP objective of providing infill/high density housing near transit to support alternative modes of transportation that reduce vehicular emissions.

[2] City of Garden Grove Housing Element. Accessed: https://ggcity.org/housing-element

[3] California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2021-2024, May 2024. Accessed: https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2024/

Further, as described in the analysis below, emissions generated by construction and operation of the proposed Project would not exceed thresholds. Thus, the Project would not result in an increase in the frequency or severity of existing air quality violations or cause a new violation, and no impacts would occur.

(b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non- attainment under an applicable federal or state ambient air quality standard)?

Construction Regional Emissions. Construction activities associated with the proposed Project would generate pollutant emissions from the following construction activities: demolition, site preparation, grading, building construction, paving, and architectural coating. The volume of emissions generated on a daily basis would vary, depending on the intensity and types of construction activities occurring. Construction activities would generate emissions from onsite construction equipment, haul of soils, export and import of construction materials, and construction worker vehicle trips to and from the Project site during the 6 months of construction (as estimated per the CalEEMod default construction timeline).

It is mandatory for all construction projects to comply with several SCAQMD Rules, including Rule 403 for controlling fugitive dust, PM_{10}, and $PM_{2.5}$ emissions from construction activities. Rule 403 requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the proposed Project site, covering all trucks hauling soil with a fabric cover and maintaining a freeboard height of 12-inches, and maintaining effective cover over exposed areas. Compliance with Rule 403 was accounted for in the construction emissions modeling and is ensured through the City's development permitting process. In addition, implementation of SCAQMD Rule 1113 that governs the VOC content in architectural coating, paint, thinners, and solvents, would be required and is also ensured through the City's development permitting process.

As shown in Table AQ-1, CalEEMod modeling results detail that construction emissions generated by the proposed Project would not exceed SCAQMD regional thresholds. Therefore, construction activities would result in a less than significant impact.

Table AQ-1: Regional Construction Emissions Summary

Construction Activity	Maximum Daily Emissions (pounds/day)					
	ROG	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Demolition	1.4	14.2	14.3	<0.1	1.8	0.7
Site Preparation	0.7	5.6	6.4	<0.1	0.7	0.4
Grading	1.7	16.0	14.6	<0.1	3.1	1.7
Building Construction	0.9	7.6	10.8	<0.1	0.8	0.4
Paving	0.7	5.3	7.1	<0.1	0.5	0.3
Architectural Coating	40.3	1.2	1.8	<0.1	0.1	0.1
Maximum Daily Emissions	**40.3**	**16.0**	**14.6**	**<0.1**	**3.1**	**1.7**
SCAQMD Significance Thresholds	75	100	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Air Quality Impact Analysis, Appendix D

Operational Emissions. Implementation of the Project would result in long-term regional emissions of criteria air pollutants and ozone precursors associated with area sources, such as natural gas and electricity

consumption, landscaping, application of architectural coatings, and consumer products. However, operational vehicular emissions would generate a majority of the emissions generated from the Project.

Operational emissions associated with the proposed Project were modeled using CalEEMod and are presented in Table AQ-2. As shown, the proposed Project would result in long-term regional emissions of the criteria pollutants that would be below the SCAQMD's applicable thresholds. This is a conservative analysis as no credit was taken for operation of the existing building on the site. Therefore, the Project's operational emissions would not exceed the NAAQS and CAAQS, would not result in a cumulatively considerable net increase of any criteria pollutant impacts, and would be less than significant.

Table AQ-2: Summary of Regional Operational Emissions

Operational Activity	Maximum Daily Emissions (pounds/day)					
	ROG	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Mobile	0.7	0.5	5.4	<0.1	1.3	0.3
Area	1.7	<0.1	2.6	<0.1	<0.1	<0.1
Energy	<0.1	0.1	<0.1	<0.1	<0.1	<0.1
Total Operational Emissions	**2.4**	**0.6**	**8.0**	**<0.1**	**1.3**	**0.3**
SCAQMD Significance Thresholds	55	55	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Air Quality Impact Analysis, Appendix D

(c) Expose sensitive receptors to substantial pollutant concentrations?

Local Emissions. The SCAQMD recommends the evaluation of localized NO_x, CO, PM_{10}, and $PM_{2.5}$ construction-related impacts to sensitive receptors in the immediate vicinity of the Project site. Such an evaluation is referred to as a localized significance threshold (LST) analysis. The impacts were analyzed pursuant to the SCAQMD's Final Localized Significance Threshold Methodology. According to the LST Methodology, off-site mobile emissions from the Project should not be included in the emissions compared to the LSTs. SCAQMD has developed LSTs that represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards, and thus would not cause or contribute to localized air quality impacts. LSTs are developed based on the ambient concentrations of NOx, CO, PM_{10}, and $PM_{2.5}$ pollutants for each of the 38 source receptor areas (SRAs) in the SCAB. The Project site is located in SRA 17, Central Orange County.

Sensitive receptors include uses such as residences, schools, playgrounds, childcare centers, and athletic facilities. The nearest sensitive receptors to the Project site are the residences located approximately 14.63 to 15.24 meters (48-50 feet) south of the Project site.

Construction LST. The localized thresholds from the mass rate look-up tables in SCAQMD's Final Localized Significance Threshold Methodology document, were developed for use on projects that are less than or equal to 5-acres in size or have a disturbance of less than or equal to 5 acres daily and were used to evaluate LSTs. The maximum number of acres disturbed on the peak day of construction was calculated from the CalEEMod model construction equipment list, which identifies that crawler tractors, graders, and rubber-tired dozers disturb 0.5-acre in an 8-hour day and scrapers disturb 1.0-acre in an 8-hour day. It was determined that the Project's construction activities could disturb the entire 0.54 site in one day.

As shown in Table AQ-3, with implementation of SCAQMD Rules 403 and 1113, the maximum daily construction emissions from the proposed Project would not exceed the applicable SCAQMD LST thresholds. Therefore, impacts would be less than significant.

Table AQ-3: Localized Construction Emissions

Construction Activity	Maximum Daily Regional Emissions (pounds/day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Demolition	12.8	13.2	1.4	0.6
Site Preparation	5.6	6.1	0.6	0.4
Grading	14.7	13.6	2.7	1.6
Building Construction	7.3	9.0	0.3	0.3
Paving	5.2	6.3	0.2	0.2
Architectural Coating	1.2	1.5	<0.1	<0.1
Maximum Daily Emissions	**14.7**	**13.6**	**2.7**	**1.6**
SCAQMD Significance Thresholds	81	485	4	3
Threshold Exceeded?	**No**	**No**	**No**	**No**

Source: Air Quality Impact Analysis, Appendix D

Operational LST. According to the SCAQMD LST methodology, LSTs apply to project stationary mobile sources (SCAQMD, 2008a). Projects that involve mobile sources that spend long periods queuing and idling at a site, such as transfer facilities or warehousing and distribution buildings, have the potential to exceed the operational localized significance thresholds.

The proposed Project would operate 34 residential units, which do not involve vehicles idling or queueing for long periods. Therefore, due to the lack of significant stationary source emissions, impacts related to operational localized significance thresholds would be less than significant.

Overall, the proposed Project would not result in any significant effects relating to air quality; therefore, the proposed Project meets the air quality related criteria of CEQA Guidelines Section 15332(d).

Construction Health Risks. A Construction Health Risk Assessment (HRA) (Appendix E) was also prepared for the Project to determine if toxic air contaminants (TACs) from diesel particulate matter (DPM) from construction equipment and vehicles would have the potential to impact surrounding sensitive receptors. The predominant sources of DPM emissions resulting from construction is from heavy-duty diesel trucks that travel to, from, and within the Project site each day, as well as the off-road construction equipment. Operation of the proposed residences does not involve substantial use of heavy-duty diesel trucks or other sources of DPM emissions. Any operational DPM emissions from the Project would be less than those generated during construction, which are evaluated below.

The significance thresholds recommended by the SCAQMD include:

- Cancer Risk: ten persons per million population as the maximum acceptable incremental cancer risk due to exposure to TACs
- Non-Cancer Hazard Index (HI): 1.0

The Construction HRA identified DPM emissions from construction activities and vehicle and truck trips and completed dispersion modeling to determine both cancer and non-cancer health risks. As shown on Table AQ-

4, the estimated maximum cancer risk for construction is 1.39 in one million for the maximum impacted sensitive/residential receptors. The estimated maximum cancer risk for worker receptors during construction would be 0.14 in one million.

Table AQ-4: Summary of Proposed Project Construction Health Risk

Receptor	Cancer Risk (per million)		Exceeds Significance Threshold?
	Maximum Lifetime Proposed Project Risk	Significance Threshold	
Maximum Impacted Sensitive Receptor – Infant to Adult (30 years)	1.39	10	No
Maximum Impacted Sensitive Receptor – Adult	0.05	10	No
Maximum Impacted Worker Receptor	0.14	10	No
Receptor	**Chronic Non-Cancer Hazard Index**		**Exceeds Significance Threshold?**
	Maximum Lifetime Proposed Project Risk	**Significance Threshold**	
Maximum Impacted Sensitive Receptor – Infant to Adult (30 years)	<0.01	1	No
Maximum Impacted Sensitive Receptor – Adult	<0.01	1	No
Maximum Impacted Worker Receptor	0.02	1	No

Source: Construction HRA, Appendix E.

Thus, the maximum cancer risk from construction of the proposed Project would not exceed the SCAQMD cancer health risk significance threshold of 10 in one million. In addition, the Project's maximum estimated non-cancer health risk is 0.02, for the maximum impacted worker receptor, which is below the significance threshold of 1.0. Thus, the Project impact related to both cancer and non-cancer health risks would be less than significant.

(d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

The proposed Project would not emit other emissions, such as those generating objectionable odors, that would affect a substantial number of people. The threshold for odor is identified by SCAQMD Rule 402, Nuisance, which states:

> *A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals*.

The type of facilities that are considered to result in other emissions, such as objectionable odors, include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities.

The proposed Project would implement residential development that does not involve the types of uses that would emit objectionable odors affecting a substantial number of people. In addition, odors generated by the Project are required to be in compliance with SCAQMD Rule 402, which would prevent nuisance odors.

During construction, emissions from construction equipment, architectural coatings, and paving activities may generate odors. However, these odors would be temporary, intermittent in nature, and would not affect a substantial number of people. Any potential noxious odors would be confined to the immediate vicinity of the construction equipment. Also, the short-term construction-related odors would cease upon the drying or hardening of the odor-producing materials. Therefore, impacts associated with other emissions, such as odors, would not adversely affect a substantial number of people.

WATER QUALITY

(a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

The Project site is located within the Anaheim Bay-Huntington Harbor Watershed, which includes 80-square miles and all or part of 11 cities. The City of Garden Grove is underlain by the Elsinore Groundwater Basin, which covers 270 square miles in Orange County. The City is within the jurisdiction of the Santa Ana Regional Water Quality Control Board (RWQCB), which sets water quality standards for all ground and surface waters within its region. Water quality standards are defined under the Clean Water Act (CWA) to include both the beneficial uses of specific water bodies and the levels of water quality that must be met and maintained to protect those uses (water quality objectives). Water quality standards for all ground and surface waters overseen by the RWQCB are documented in its Basin Plan, and the regulatory program of the RWQCB is designed to minimize and control discharges to surface and groundwater, largely through permitting, such that water quality standards are effectively attained.

Construction. Implementation of the proposed Project includes demolition of the existing building, pavement, and infrastructure, site preparation, grading, excavation, construction of the new building, and infrastructure improvements. Demolition of existing structures, grading, stockpiling of materials, excavation, construction of new structures, and landscaping activities would expose and loosen sediment and building materials, which would have the potential to mix with stormwater and urban runoff and degrade surface and receiving water quality.

Additionally, construction generally requires the use of heavy equipment and construction-related materials and chemicals, such as concrete, cement, asphalt, fuels, oils, antifreeze, transmission fluid, grease, solvents, and paints. In the absence of proper controls, these potentially harmful materials could be accidentally spilled or improperly disposed of during construction activities and could wash into and pollute surface waters or groundwater, resulting in a significant impact to water quality. However, Section 6.40.050 of the GGMC states that all new development and significant redevelopment within the City shall be undertaken in accordance with the County Drainage Area Management Plan (DAMP), including any conditions and requirements established related to the reduction or elimination of pollutants in storm water runoff from the Project site, which are verified prior to the issuance of a grading permit and/or building permit by the City.

The DAMP requires construction sites to implement BMPs that address control of construction related pollutants discharges, including erosion/sediment control, onsite hazardous materials, and waste management (DAMP Section 8.0). Additionally, the Statewide NPDES Permit for General Construction Activity requires implementation of a SWPPP, by a Qualified SWPPP Developer. The SWPPP is required to be consistent with the County DAMP; address site-specific conditions related to construction; identify the sources of sediment and

other pollutants that may affect the quality of storm water discharges during construction; and implement erosion control and sediment control BMPs to reduce or eliminate sediment, pollutants adhering to sediment, and other non-sediment pollutants in water discharges during construction. Typical erosion control methods that are designed to minimize potential pollutants entering stormwater during construction include:

- Perimeter gravel bags or silt fences to prevent offsite transport of sediment;
- Storm drain inlet protection (filter fabric gravel bags and straw wattles), with gravel bag check dams within paved roadways;
- Regular sprinkling of exposed soils to control dust during construction and soil binders for forecasted wind storms;
- Specifications for construction waste handling and disposal;
- Contained equipment wash-out and vehicle maintenance areas;
- Erosion control measures including soil binders, hydro mulch, geotextiles, and hydro seeding of disturbed areas ahead of forecasted storms;
- Construction of stabilized construction entry/exits to prevent trucks from tracking sediment on City roadways;
- Construction timing to minimize soil exposure to storm events; and
- Training of subcontractors on general site housekeeping.

Adherence to a City approved SWPPP, which would be verified prior to the issuance of a demolition and/or grading permit would ensure that potential water quality degradation associated with construction activities would be minimized, and impacts would be less than significant.

Operations. The proposed Project includes operation of new residential uses on the Project site. Potential pollutants associated with the proposed uses include various chemicals from cleaners, nutrients from fertilizer, pesticides and sediment from landscaping, trash and debris, and oil and grease from vehicles. If these pollutants discharge into surface waters, it could result in degradation of water quality.

However, operation of the proposed Project would be required to comply with the requirements of the County DAMP and would be required to implement a Water Quality Management Plan (WQMP) that includes Low Impact Development (LID) features and BMPs to limit the potential for pollutants to enter surface water, such as storm water runoff. The Preliminary WQMP has been completed and is included as Appendix F. The purpose of a WQMP is to reduce discharge of pollutants by reducing or eliminating sources of pollutants, capture pollutants, and manage site runoff volumes and flow rates through application of appropriate LID features and BMPs. The WQMP is required to include implementation of non-structural, structural, source control and treatment control BMPs that have been designed to protect water quality.

The Project would install drainage features to convey runoff to a bioretention system that would be installed on the site, which has been designed to capture, infiltrate, and treat flows from the 85th percentile storm as required by the DAMP. The additional types of BMPs that would be implemented as part of the project WQMP are listed in Table WQ-1.

Table WQ-1: Types of BMPs Incorporated into the Project WQMP

Type of BMP	Description of BMPs
LID Site Design	Optimize the site layout: The site has been designed so that runoff from impervious surfaces would flow to either landscaped areas or an underground bioretention basin for filtration, treatment, and infiltration.
	Use pervious surfaces: Landscaping is incorporated into the project design to increase the amount of pervious area and onsite retention of stormflows.
Source Control	Storm Drain Stenciling: All inlets/catch basins would be stenciled with the words "Only Rain Down the Storm Drain," or equivalent message.
	Design and construct trash and waste storage areas to reduce pollution introduction.
	Need for future indoor & structural pest control: The building would be designed to avoid openings that would encourage entry of pests.
	Landscape/outdoor pesticide use: Landscape plans would accomplish all of the following: • Design landscaping to minimize irrigation and runoff, to promote surface infiltration where appropriate, and to minimize the use of fertilizers and pesticides that can contribute to storm water pollution. • Consider using pest-resistant plants, especially adjacent to hardscape. • To ensure successful establishment, select plants appropriate to site soils, slopes, climate, sun, wind, rain, land use, air movement, ecological consistency, and plant interactions.
	Roofing, gutters, and trim: The architectural design would avoid roofing, gutters, and trim made of copper or other unprotected metals that may leach into runoff.
	Sidewalks and parking lots: Sidewalks and parking lots shall be swept regularly to prevent the accumulation of litter and debris. Debris from pressure washing would be collected to prevent entry into the storm drain system. Wash water containing any cleaning agent or degreaser would be collected and discharged to the sanitary sewer and not discharged to a storm drain.
Treatment Control	Biofiltration Systems: The underground bioretention basin system proposed for the Project would detain runoff and filter it prior to discharge.

As described previously, a WQMP is required to be approved prior to the issuance of a building or grading permit. The Project's WQMP would be reviewed and approved by the City to ensure it complies with the DAMP regulations. In addition, the City's permitting process would ensure that all LID features in the WQMP would be implemented with the project. Overall, implementation of the WQMP pursuant to the existing regulations would ensure that operation of the proposed Project would not violate any water quality standards, waste discharge requirements, or otherwise degrade water quality; and impacts would be less than significant.

(b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

In the existing condition, storm flows drain across the site to Coast Street and the alley to the south of the site. The Project site does not currently provide for groundwater recharge and is fully developed and not used for groundwater recharge. The Project would redevelop the site, and as detailed in the WQMP (Appendix F), the impervious areas onsite would be reduced from 92.16 percent impervious to 86 percent impervious; a reduction of 6.16 percent. The proposed Project would have 14 percent (14%) pervious landscaped open spaces. As detailed in the Preliminary Hydrology and Hydraulic Study (Appendix G) the runoff volume would be reduced from 2.17 cubic feet per second (CFS) to 1.58 cfs in a 100-year storm condition. Unlike the existing conditions, storm water would be conveyed to a biofiltration area that would collect, treat, and slowly discharge storm water. The biofiltration system has been designed to treat and infiltrate flows, as detailed in the WQMP. Therefore, the Project would not substantially deplete groundwater supplies or interfere substantially with

groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.

In addition, groundwater within the Project region is managed by the Orange County Water District (OCWD). To ensure the Basin is not overdrawn, OCWD monitors water levels and recharges the Basin with local and imported water. Continued management of the groundwater basin by OCWD ensures that substantial depletion of groundwater supplies would not occur. Likewise, the Project would not impede OCWD management of the groundwater basin. Thus, impacts related to the groundwater recharge and sustainable groundwater management of the basin would not occur.

(c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) result in substantial erosion or siltation on- or off-site;

No streams, creeks, or rivers exist on or adjacent to the Project site. Construction of the proposed Project would require excavation and grading activities that would expose and loosen building materials and sediment, which has the potential to mix with storm water runoff and result in erosion or siltation offsite. However, the Project site does not include any slopes, which reduces the erosion potential. Also, the NPDES Construction General Permit and Orange County DAMP require preparation and implementation of a SWPPP by a Qualified SWPPP Developer for the proposed construction activities. The SWPPP is required to address site-specific conditions related to potential sources of sedimentation and erosion and would list the required BMPs that are necessary to reduce or eliminate the potential of erosion or alteration of a drainage pattern during construction activities.

In addition, a Qualified SWPPP Practitioner (QSP) is required to ensure compliance with the SWPPP through regular monitoring and visual inspections during construction activities. The SWPPP would be amended and BMPs revised, as determined necessary through field inspections, in order to protect against substantial soil erosion, the loss of topsoil, or alteration of the drainage pattern. Compliance with the Construction General Permit and a SWPPP prepared by a QSD and implemented by a QSP would prevent construction-related impacts related to potential alteration of a drainage pattern or erosion from development activities. With implementation of the NPDES Permit for General Construction Activity, including a SWPPP with BMPs, that would be verified by the City during the permitting approval process, impacts related to alteration of an existing drainage pattern during construction that could result in substantial erosion or siltation, and potential impacts would be less than significant.

During operation of the Project, the WQMP (Appendix F) would be implemented, which is detailed in previous Water Quality response (a). The impervious areas would not be subject to erosion and the pervious areas would be landscaped with groundcovers that would inhibit erosion. Also, the proposed Project would maintain the existing drainage pattern. In the existing condition, storm flows drain to Coast Street and the alley to the south of the site. With implementation of the Project, storm water runoff would be conveyed to landscape areas and to a biofiltration area that would filter and treat flows. the proposed landscaping and drainage system would reduce the potential of onsite soils being eroded, siltation, flooding, and discharge of pollutants compared to the existing condition.

ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

As detailed in the previous response, for Project construction, the NPDES Construction General Permit and Orange County DAMP require preparation and implementation of a SWPPP including BMPs to protect against alteration of the drainage pattern that could result in flooding. Compliance with the Construction General Permit and a SWPPP prepared by a QSD and implemented by a QSP would prevent construction-related impacts to increases of surface runoff that could result in flooding. The required SWPPP with BMPs would be verified by the City during the permitting approval process, and potential impacts would be less than significant.

During operation of the Project, the WQMP (Appendix F) would be implemented. As detailed previously, the Project would reduce impervious area on the site by 14 percent. The impervious areas would not be subject to erosion and the pervious areas would be landscaped with groundcovers that would inhibit erosion. Also, the proposed Project would maintain the existing drainage pattern. In the existing condition, storm flows drain to Coast Street and the alley to the south of the site. With implementation of the Project, storm water runoff would be conveyed to landscape areas and to a biofiltration area that would filter and treat flows. As shown in Table WQ-2, the Project runoff conditions for a 100-year storm would decrease by 0.59 cfs from predevelopment conditions with the proposed drainage system, and the Project would not result in exceedance of the capacity of the existing stormwater drainage system. As such, the Project would not increase surface runoff that could result in flooding.

Table WQ-2: 100-Year Storm Water Flow Comparison

	Existing Condition	Proposed Condition
Peak Flow	2.17 cfs	1.58 cfs

Source: Preliminary Hydrology and Hydraulic Study, Appendix G

Additionally, as part of the permitting approval process, the proposed drainage and water quality design and engineering plans would be reviewed by the City to ensure that the site-specific design limits the potential for increased runoff that could result in flooding. Thus, significant impacts would not occur.

iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;

As detailed in the previous response, Project construction requires preparation and implementation of a SWPPP including BMPs, pursuant to the Orange County DAMP, to protect against alteration of the drainage pattern that could result in flooding or additional sources of polluted runoff. Compliance with the Construction General Permit and a SWPPP prepared by a QSD and implemented by a QSP would prevent construction-related impacts to drainage and polluted runoff. The required SWPPP with BMPs would be verified by the City during the permitting approval process; thus, potential impacts would be less than significant.

During operation of the Project, the WQMP (Appendix F) would be implemented. As detailed previously, the Project would reduce impervious area on the site by 14 percent and runoff conditions for a 100-year storm would decrease by 0.59 cfs. The Project would convey storm water runoff to landscape areas and a biofiltration system that would filter and treat flows. With the proposed drainage system, and the Project would not result in exceedance of the capacity of the existing stormwater drainage system and would not result in substantial additional sources of polluted runoff.

iv) impede or redirect flood flows?

As detailed in the previous response, for Project construction, the NPDES Construction General Permit and Orange County DAMP require preparation and implementation of a SWPPP including BMPs to protect against alteration of the drainage pattern that could impede or redirect flood flows. The required SWPPP with BMPs

would be verified by the City during the permitting approval process to ensure that impeding or redirecting drainage flows would not occur.

As described previously, the proposed project would reduce impervious area by 14 percent and decrease 100-year storm flows by 0.59 cfs. With implementation of the Project, storm water runoff would be conveyed to landscape areas and to a biofiltration area that would filter and treat flows that would infiltrate, The Project would not impede or redirect flood flows.

(d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) 06059C0138J, the Project site is not located within a flood zone. A 100-year flood hazard area is an area in which a flood event has a one percent probability of occurring in any given year. The FEMA FIRM for the Project site and vicinity shows that the site is within a 0.2 percent annual chance of flood hazard and is identified as "Zone X." Therefore, the site is not within a 100-year flood zone. In addition, the Project site does not contain any bodies of water and is not located in the vicinity of any bodies of water that could result in flooding on the Project site. The Project site is located over 6 miles from the Pacific Ocean and due to its location, is not at risk of inundation from tsunami. Likewise, the Project site is not located near any water retention facilities or water bodies that could result in seiche. For this reason, the Project site is not at risk of inundation from seiche waves. Therefore, the proposed Project would not risk the release of pollutants from inundation from seiche, tsunami, or from being within a flood zone.

(e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

As detailed previously, the use of BMPs during construction implemented as part of a SWPPP as required by the NPDES Construction General Permit that would be verified during the City's construction permitting process, would serve to ensure that potential Project impacts related to construction activities would be less than significant. Thus, construction of the Project would not conflict or obstruct implementation of a water quality control plan.

Also, new development projects are required to implement a WQMP that would comply with the Orange County DAMP. The WQMP and applicable BMPs are verified as part of the City's permitting approval process, and construction plans would be required to demonstrate compliance with these regulations. Therefore, operation of the Project would not conflict with or obstruct a water quality control plan.

In addition, as explained previously, groundwater within the Project region is managed by OCWD. To ensure the Basin is not overdrawn, OCWD monitors water levels and recharges the Basin with local and imported water. Continued management of the groundwater basin by OCWD ensures that substantial depletion of groundwater supplies would not occur. The Project is an infill and redevelopment project that is located within a developed area and would not impede the OCWD management of the groundwater basin. The Project would redevelop the site, and as detailed in the WQMP (Appendix F), the impervious areas onsite would be reduced from 92.16 percent impervious to 86 percent impervious; a reduction of 6.16 percent. The proposed Project would have 14 percent (14%) pervious landscaped open spaces. The Project includes a detention basin that would filter and treat flows that would be slowly discharged, which would not conflict with sustainable groundwater management. Thus, impacts related to a water quality control plan or sustainable groundwater management plan would not occur.

Overall, the proposed Project would not result in any significant effects relating to water quality; therefore, the proposed Project meets the water quality related criteria of CEQA Guidelines Section 15332(d).

e. Criterion Section 15332(e): Utilities: The site is located in an urbanized and developed area and is developed and adequately served by all required utilities and public services. The utilities necessary to construct and operate the proposed Project (water, wastewater, electric, natural gas, landfill capacity) and public services (fire, police, and schools) would be adequately provided by existing utility and service systems as detailed below.

Water Utility: The proposed Project would connect to existing utility service lines surrounding the Project site. The proposed Project would install onsite 6-inch water lines that would connect to the existing 8-inch water line in Coast Street. The impacts related to installation of the new water lines are included in the analysis herein, such as within the construction traffic, construction air quality, and construction noise analysis.

The City's 2020 Urban Water Management Plan (UWMP) projects that between 2020 and 2045, the population of the City will increase by 4.8 percent and the City's water supply portfolio will increase as needed to meet water needs. The 2020 UWMP projections include The City's RHNA allocation for 2021 - 2029 of 19,168 units. The 2020 UWMP shows that the City's water demand in 2020 was 21,979 acre-feet yearly (AFY) and is projected to increase to 22,792 AFY by 2045. This is an increase of 813 AFY and assumes continued provision of water to existing developed land uses, such as the existing building on the Project site.

The Project would develop the site with 34 residential units, which would house approximately 118 residents, based on the 2024 California Department of Finance data that the City has an average of 3.47 persons per household. The 118 new onsite residents would result in a water demand of approximately 16,756 gallons per day (18.8 AFY) using the 2020 UWMP baseline water use rate of 142 Gallons Per Capita per Day (GPCD), which is a conservative assumption as the 2020 UWMP states that the City used 93 GPCD in 2020. This represents 2.3 percent of the City's anticipated increase in water demand between 2020 and 2030, not including the reduction of water from removal of the existing building (the City's 2020 UWMP anticipates water demand from the existing use of the site based on the year 2020 Commercial land use designation of the site that allowed a FAR of 0.5 on the 0.54-acre site [which is 11,761.2 square feet of commercial uses]). In addition, the Project would implement a number of water conservation measures as required by Cal/Green and Title 24 requirements, such as use of water efficient plumbing fixtures, appliances, and irrigation systems, and routing runoff to landscape areas. Therefore, the City has sufficient water supplies available to serve the Project. The water demand needed for the Project would be accommodated by the existing 8-inch water line in the Coast Street right-of-way, which would not require expansion to serve the Project.

Sewer Utility: The proposed Project would install 6-inch sewer lines on the site that would connect to the existing 8-inch sewer lines in Coast Street, which has adequate capacity to serve the new residences on the site. The impacts related to installation of the new sewer lines are included in the analysis herein, such as within the construction traffic, construction air quality, and construction noise analysis.

The proposed residences would generate new wastewater, which would be conveyed through existing sewer facilities to OCSD's wastewater treatment plant No. 1 in Fountain Valley that has a capacity of 320 million gallons per day (MGD). In 2023-24, the estimated average daily flow received at the wastewater treatment plant No. 1 was 124 MGD. Thus, the plant has an additional capacity of 196 MGD (OCSD 2024).

As detailed previously, the Project is anticipated to generate a water demand of 16,756 gallons per day, some of which would be used for landscaping and other uses and would not enter the sewer system. However,

assuming the maximum water from the Project becomes wastewater, the 16,756 gallons per day would be accommodated by the OCSD's excess capacity. Therefore, the Project would be adequately served by the existing wastewater system.

Electric and Natural Gas: The proposed Project would install onsite electrical and natural gas lines that would connect to existing infrastructure within Coast Street. The impacts related to installation of the new electric and natural gas lines are included in the analysis herein, such as within the construction traffic, construction air quality, and construction noise analysis. The existing electric and gas utilities would be able adequately serve the Project. All service confirmations would be confirmed by the City prior to issuance of occupancy permits.

Landfills: In 2019 (the most recent data available), most of the solid waste from the City, which was disposed of in landfills, went to either the Olinda Alpha Sanitary Landfill or the Frank Bowerman Sanitary Landfill (Calrecycle 2024).

The Olinda Alpha Sanitary Landfill is permitted to accept 8,000 tons per day of solid waste and is permitted to operate through 2036. In September 2024 the maximum tonnage accepted was 7,240 tons, which is 760 tons less than the allowable tonnage. The Frank Bowerman Sanitary Landfill is permitted to accept 11,500 tons per day of solid waste and is permitted to operate through 2053. In September 2024, the landfill had a maximum tonnage of 10,295; thus, having an average daily additional capacity of 1,205 tons per day (Calrecycle SWIS 2024).

Construction. Project construction would generate solid waste for landfill disposal in the form of demolition debris from the removal of the existing building, pavement, and infrastructure that would be removed from the site. Construction waste in the form of packaging, used construction materials, and remnant materials would also be generated by construction of the proposed Project. Demolition activities would generate the most construction debris. Based on the CalEEMod User Guide Appendix C: Emission Calculation Details for CalEEMod generation factors, the Project would generate approximately 149.6 tons of debris over a 10-day hauling period. This would result in an average of 14.96 tons of solid waste demolition debris per day for 10 days. However, the California Green Building Standards Code requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste. Thus, the demolition and construction solid waste that would be disposed of at the landfill would be approximately 35 percent of the waste generated. Therefore, demolition activities, which would generate the most solid waste would generate approximately 5.24 tons of solid waste per day for 10 days.

As described above, the Olinda Alpha Sanitary Landfill has an average daily additional capacity of 760 tons per day and the Frank Bowerman Sanitary Landfill has an average daily additional capacity of 1,205 tons per day (Calrecycle 2024), which is sufficient permitted capacity to accommodate the additional 5.24 tons of demolition waste per day for approximately 10 days that would result from the Project. The GGMC Section 18.60.040, *Minimum Construction and Demolition Waste Diversion Requirements*, requires construction plans and specifications to implement reuse, recycling, and/or diversion of the minimum percentage amount of designated recyclable and reusable materials as set forth by the CALGreen (Part 11 of Title 24, California Code of Regulations). Thus, the Project would be adequately served by the existing landfills and construction impacts related to landfill capacity would be less than significant.

Operation. The CalEEMod modeling for the Project (included in Appendix D), shows that the Project would generate 25.1 tons of solid waste per year, which would be 0.48 tons per week. However, based on the current recycling requirements, which require diversion of 75 percent of solid waste away from landfills, the Project would result in 0.12 tons (240 pounds) of solid waste per week being disposed of in landfills. As described

above, the Olinda Alpha Sanitary Landfill has an average daily additional capacity of 760 tons per day and the Frank Bowerman Sanitary Landfill has an average daily additional capacity of 1,205 tons per day (Calrecycle 2024), which is sufficient permitted capacity to accommodate the additional solid waste disposal needs that would result from the project. In addition, trash collection services would be arranged prior to the issuance of building permits.

Fire Services: There are seven City owned fire stations within the City that are staffed by the Orange County Fire Authority (OCFA). The OCFA response times for engines to arrive on scene after an emergency has been called are between 5 to 7 minutes. The closest Fire Station is 1.4 mile from the Project site, and there are two fire stations located within three miles of the site. The City's fire stations are listed below with the distance from the Project site:

- Fire Station 80, located at 14162 Forsyth Lane, which is 2.8 miles from the Project site.
- Fire Station 81, located at 11261 Acacia Parkway, which is 3.9 miles from the Project site.
- Fire Station 82, located at 11805 Gilbert Street, which is 3.1 miles from the Project site.
- Fire Station 83, located at 12132 Trask Avenue, which is 4.3 miles from the Project site
- Fire Station 84, located at 12191 Valley View Street, which is 3.6 miles from the Project site
- Fire Station 85, located at 12751 Western Avenue, which is 1.4 miles from the Project site
- Fire Station 86, located at 12232 West Street, which is 5.1 miles from the Project site.

The proposed Project would remove the existing building and develop a building with 34 residences on the site. The building would include new fire prevention infrastructure pursuant to current code requirements. The City has adopted the California Fire Code (Title 24, Part 9 of the California Code of Regulations) in GGMC Section 18.16.04, which regulates new structures related to safety provisions, emergency planning, fire-resistant construction, fire protection systems, and appropriate emergency access throughout the site. The Project's adherence to the existing fire code requirements would be verified as part of the City's regular permitting process.

As the site is within an area that is currently served by Fire Station 85 that is 1.4 miles from the site and is another City fire station within three miles of the site, OCFA would be able to continue to provide fire services to the Project site and surrounding area from the existing fire stations. Additionally, the Project would be constructed pursuant to existing California Fire Code regulations that would be verified during the City's permitting process. Also, the proposed Project would result in a limited number of residents on the site. The 118 residents at full capacity would be a maximum increase of 0.07% of the City's population of 171,024 (CA Dept of Finance 2024). The new construction and limited increase in population within three miles of two fire stations would be adequately served by the existing fire services, and no expansion of fire services facilities would be required.

Police Services: The Garden Grove Police Department provides police services to the Project area. The Police Department headquarters is located at City Hall, which is approximately 3.8 miles from the Project site. The City has 183 sworn officers and 71 non-sworn Police Department employees (GG 24-25), which equates to 0.93 sworn officer per 1,000 residents.

Construction. Crime and safety issues during project construction may include theft of building materials and construction equipment, malicious mischief, graffiti, and vandalism, which can result in the need for police services. However, the site would have security fencing during construction activities, and onsite materials would be either locked or kept in secure locations and would be limited based on the materials needed during

each phase of construction, which would reduce these concerns during the approximately 6-month construction period, and the existing City police services are anticipated to continue to adequately serve the area.

Operation. Redevelopment of the Project site would result in approximately 118 residents onsite, which would be a maximum increase of 0.06% of the City's population. Based on the City's existing ratio of 0.93 sworn officer per 1,000 residents, the 118 residents at full capacity would result in the need for 11 percent of a new officer, which would not require expansion of the existing police facilities. During operation, the Project is anticipated to generate a typical range of police service calls, such as vehicle break-ins, residential thefts and disturbances, and vandalism. Security concerns would be addressed by providing low-intensity security lighting. Also, pursuant to the City's existing permitting process, the Police Department would review the Project's site plans to ensure that design measures are incorporated appropriately to provide a safe environment, and no new police facilities are required.

Due to the redevelopment nature of the Project site that is within an area that is already served, the increase would not be significant when compared to the current demand levels. Law enforcement personnel are anticipated to be able to respond in a timely manner to emergency calls from the Project site and the Project would be adequately served by police services.

School Services: The Project site is in the Westminster School District that provides K-8 public school services. The following schools identified by the Westminster School District website school locator would serve the site:

- Meairs Elementary School, at 8441 Trask Avenue, Garden Grove
- Warner Middle School, at 14171 Newland Street, Westminster

High School services are provided by the Huntington Beach Union High School District. The School District website school locator identified that the Westminster High School located at 14325 Goldenwest Street Westminster would serve the site.

Development of the Project would generate a new student population on the Project site, who would generally (unless homeschooled or attending a private school) attend one of the three schools listed above. This would generate additional students to be served at local public schools. However, the need for additional school facilities is addressed through compliance with school impact fee assessment SB 50 (Chapter 407 of Statutes of 1998). SB 50 sets forth a state school facilities construction program, in which school districts (including the Westminster School District and the Huntington Beach Union High School District) collect fees at the time of issuance of building permits for development projects. The existing development impact fee for both school districts is $5.17 per square foot for all new residential development. In addition, pursuant to Government Code Section 65995 payment of the school impact fees provides full and complete mitigation of school impacts. As a result, impacts related to school facilities from the increase in students related to the Project would be less than significant with the Government Code required fee payments, and the Project would be adequately served by school services.

Utilities Conclusion

Given the Project size and its location within an area that is currently served by utilities and the information provided above, the Project would be adequately served by all required utilities and public services. Therefore, the proposed Project meets the criteria of CEQA Guidelines Section 15332(e).

5.1 EXCEPTIONS FOR EXEMPTIONS

In addition to investigating the applicability of CEQA Guidelines Section 15332 (Class 32), this CEQA document also assesses whether any of the exceptions to qualifying for the Class 32 categorical exemption for an Infill Project are present.(CEQA Guidelines Section 15300.2)

a. Criterion 15300.2(a): Location: Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

The Project does not qualify for an exemption under Classes 3, 4, 5, 6 or 11, which are related to other types of projects such as small facilities, minor alterations of land or land use limitations, information collection, and regulatory agency actions.

The Project is located within an urban area, and as detailed previously, is not located within a sensitive environment. In addition, the Project would not result in any impacts on an environmental resource of hazardous or critical concern, as described throughout this Exemption Checklist document. Therefore, the exception under criterion 15300.2(a) is not applicable.

b. Criterion 15300.2(b): Cumulative Impact: *All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.*

The proposed Project would redevelop a site that is disturbed, has been long developed, and is already served by utilities, public services, and transportation infrastructure. Any construction effects would be temporary, confined to the Project vicinity, and based on compliance with existing applicable regulatory requirements, such as Air Quality Management District Rules and Regional Water Quality Control Board (RWQCB) regulations that are implemented and verified through the City's development permitting process, impacts would be less than significant.

As explained previously, the Project would generate a limited number of vehicular traffic trips that do not exceed the City's screening threshold. The site is located within a Transit Priority Area and a SCAQMD High Quality Transit Area, and low VMT area; and thus, potential impacts related to transportation would be less than cumulatively considerable. Similarly, the noise analysis shows the limited construction noise and vibration that would be generated over the six-month construction period that would occur within the GGMC Section 8.47.060(d) allowable construction hours as adopted at the time of construction permitting, subject to SB 330 vested rights for the Project; and that even with two distinct construction noise sources (such as those that could occur from cumulative construction noise) thresholds would not be exceeded at the closest noise sensitive receptors, and no significant cumulative impact would occur. Additionally, the Garden Grove Focused General Plan Update and Zoning Amendments Environmental Impact Report (EIR) addressed "anticipated changes to the demographic, economic and environmental conditions in Garden Grove through the year 2040."[4] The changes analyzed included a 20,242 dwelling unit and 63,818 person population increase in the City.[5] As stated in the EIR, "Individual construction projects would be spread throughout the City; however, no two projects would likely occur in close proximity contemporaneously. In addition, construction equipment would

[4] EIR, 2-1.
[5] *Id.* at 3-15.

be spread throughout a work area and may not operate concurrently in the same area of the work site at the same time."[6] The EIR found that with compliance with General Plan policies and City Municipal Code requirements, the construction noise impact of General Plan build out would be less than significant. Thus, cumulative construction noise impacts would be less than significant.

Also, the operational noise and vibration that would be generated by the Project would not be cumulatively considerable. The 13 a.m. and 17 p.m. peak hour vehicle trips generated by the Project (do not include the reduction of trips from removal of the existing onsite use) would equate to 3.5 trips per minute within the p.m. peak hour would not generate noise that could be cumulatively considerable. Further, as show previously in Table N-4, the worst case operational noise would generate 27 dBA at the closest receptor, which is far below the existing ambient noise levels of 60.0 and 62.7 dBA (detailed in Table N-1). The Project's much lower operational noise volume would not be heard above the existing ambient noise; and therefore, would result in a less than significant cumulative noise impact.

The SCAQMD's CEQA air quality methodology provides that projects that result in daily emissions that exceed any of the thresholds would have both an individually (project-level) and cumulatively significant air quality impact. As evaluated previously in Tables AQ-1 through AQ-3, the proposed Project would not exceed the SCAQMD's applicable thresholds. Therefore, the Project's operational emissions would not exceed the NAAQS and CAAQS, would not result in a cumulatively considerable net increase of any criteria pollutant impacts. Also, as detailed in Table AQ-4, construction related health risks were far below the threshold for both cancer and non-cancer health risks and would have a limited ability to be cumulatively considerable. Further, there are no cumulative projects within 1,000-foot radius of the Project that would substantially generate TACs during the Project's six-month construction period. Thus, the Project would have a less than significant cumulative impact.

The Project would develop the site consistent with the City's land use plan and would implement the City's General Plan, which assumes that "Densities above the maximum-stated densities may be permitted pursuant to the State Density Bonus law" (General Plan Land Use Element Page 2-25). Likewise, the City's Housing Element anticipates the redevelopment of R-3 zoned site for higher density residential and application of density bonuses, which is consistent with the proposed Project. Further, as detailed herein, the proposed Project would not result in any potentially significant impacts that have the potential to cumulatively combine. No potential cumulative impacts would result from the Project. Therefore, the exception under CEQA Guidelines Section 15300.2 (b) does not apply to the Project.

c. Criterion 15300.2(c): Significant Effects: A *categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*

There are no known unusual circumstances that are applicable to the Project, and which may result in a significant effect on the environment. The proposed Project consists of the redevelopment of the site that was previously used for office and educational uses within a developed area within a developed area that contains other multi-family residential uses and that is served by utilities and multiple forms of transportation. There is nothing unusual about the Project site or the proposed Project. The Project site would be consistent with the City's General Plan land use and the Zoning Code requirements with implementation of density bonus concessions and waivers. Implementation of the proposed Project would not introduce a new activity to the area that could result in a significant effect on the environment. Therefore, the exception under CEQA

[6] *Id.* at 4.10-28.

Guidelines Section 15300.2(c) does not apply to the Project. Additionally, the Project does not have any significant impacts.

d. Criterion 15300.2(d): Scenic Highways: *A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.*

The California Department of Transportation's (Caltrans) Landscape Architecture Program administers the Scenic Highway Program contained in the Streets and Highways Code, Sections 260–263. State Highways are classified as either Officially Listed or Eligible. There are no officially designated state scenic highways in the City or in vicinity of the Project (Caltrans 2023). The closest State-designated scenic highway is a portion of State Route 91 (SR-91), which is located approximately 15 miles northeast of the Project site. Therefore, the proposed Project does not have the potential to damage resources within a State-designated scenic highway. Therefore, the exception under CEQA Guidelines Section 15300.2(d) does not apply to the Project.

e. Criterion 15300.2(e): Hazardous Waste Sites: *A categorical exemption shall not be used for a project located on a site which is included on any list complied pursuant to Section 65962.5 of the Government Code.*

A Phase I Environmental Site Assessment (Appendix H) was prepared for the Project site that included a search of government databases that did not identify the Project site on any list of hazardous material sites. In addition, a survey of the site was completed, which did not identify any hazardous materials or evidence of previous release of hazardous materials on the site.

The Project site is a vacant undeveloped site that does not contain any identified hazardous waste. A review of the California Department of Toxic Substances Control EnviroStor databaseshows that the Project site and adjacent areas do not contain hazardous waste sites and are not on any list complied pursuant to Section 65962.5 of the Government Code. In addition, the Phase I Environmental Site Assessment conducted a search to identify if there are any hazardous material uses in the Project vicinity that could adversely affect the Project site, which did not identify an impact to the site. Therefore, the proposed Project would not be located on a list of hazardous waste site, and the exception under CEQA Guidelines Section 15300.2(e) does not apply to the Project.

f. Criterion 15300.2(f): Historical Resources: *A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resources.*

CEQA defines a historical resource as something that meets one or more of the following criteria: (1) listed in, or determined eligible for listing in, the California Register of Historical Resources; (2) listed in a local register of historical resources as defined in Public Resources Code (PRC) Section 5020.1(k); (3) identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); or (4) determined to be a historical resource by a project's Lead Agency (PRC Section 21084.1 and CEQA Guidelines Section 15064.5[a]).

The California Register defines a "historical resource" as a resource that meets one or more of the following criteria: (1) associated with events that have made a significant contribution to the broad patterns or local or regional history of the cultural heritage of California or the United States; (2) associated with the lives of persons important to local, California, or national history; (3) embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of a master or possesses high artistic values; or (4)

has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

The Phase I Environmental Site Assessment (Appendix G) evaluated the historic records searches for the Project site, which showed that the site was vacant land, prior to being occupied by two sheds and/or residential-type buildings during the 1940s. The site appeared to be vacant land again in aerial photographs from the years 1953 and 1963.

The existing building could be seen in an aerial view of the site from the year 1972. The site appeared to have remained generally unchanged in more-recent aerial photographs. Telephone directories evaluated as part of the Phase I Environmental Site Assessment (Appendix H) showed the site had been occupied by a private party and a staffing business in 1970, and a series of banks from 1975 through 1990. The site was occupied by a church-based school operated by the Gospel First Korean Baptist Foundation from the mid-1990s through 2023.

Record searches identify that there have been various uses of the existing building over the years; however, none is identified as being associated with events that have made a significant contribution to history. Likewise, the Project site is not strongly associated with the development of the region or with the founding of the City. Therefore, the site is not strongly associated with events that have made a significant contribution to the broad patterns of national or state history or with significant persons from the past.

The onsite building is of common design from the period in which it was constructed, and consists of brick walls, a pitched tile roof, and wrought iron fencing and window bars, with rooftop mechanical equipment that does not yield information important to history of prehistory. As a result, the building is not eligible for listing in the National Register of Historic Places (NR) or California Register of Historic Resources (CR) at any level, or for local designation. As such, the existing building onsite does not meet the CEQA criteria for a historic resource and the Project would not result in impacts to historic resources. The exception under CEQA Guidelines Section 15300.2(e) does not apply to the Project.

Additionally, the Project site is located adjacent to modern commercial, residential, and church buildings, that have not been identified as historic or are strongly associated with events that have made a significant contribution to the broad patterns of national or state history or with significant persons from the past. The adjacent areas do not contain historic resources or yield information important to history of prehistory. As a result, the Project would not result in impacts to historic resources; and this exception under CEQA Guidelines Section 15300.2(e) does not apply to the Project.

Conclusion

On the basis of the evidence provided above, the Project is eligible for a Class 32 Categorical Exemption in accordance with Section 15332, Infill Development Projects, of the CEQA Guidelines. Because the proposed Project meets the criteria for categorically exempt infill development projects listed in CEQA Guidelines Section 15332 and it would not have a significant effect on the environment, this analysis finds that a Notice of Exemption may be prepared for the Project.

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