RESOLUTION NO. 2026-XX

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF FULLERTON, CALIFORNIA, ADOPTING A MITIGATED NEGATIVE DECLARATION INCLUDING MITIGATION MEASURES AND MITIGATION MONITORING AND REPORTING PROGRAM FOR A NEW INDUSTRIAL WAREHOUSE BUILDING LOCATED AT 2461-2495 EAST ORANGETHORPE AVENUE

WHEREAS, applications were filed with the City of Fullerton Community and Economic Development Department for a Zoning Amendment (LRP-2025-0011) and a Major Site Plan (ZON-2025-0013), to amend the zoning designation along southerly side of the parcel from C-M-ES to M-P-100ES to be consistent with northerly half of the parcel and for the demolition of an existing business park for the construction of a new 110,232 square foot warehouse facility (Cedarwoods Fullerton Project) with associated onsite improvements on a parcel of land more specifically described as Orange County Assessor's Parcel No. 338-172-24.

WHEREAS, the City of Fullerton, as Lead Agency, prepared an Initial Study/Mitigated Negative Declaration to identify the potential environmental impacts associated with the construction and implementation of the project in conformance with the provisions of the California Environmental Quality Act (CEQA) (California Public Resources Code, Sections 21000 et seq.) and CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.).

WHEREAS, mitigation measures were identified to reduce or avoid significant effects on the environment, and a Mitigation Monitoring and Reporting Program will be prepared to ensure and document compliance with the mitigation measures during project implementation.

WHEREAS, the City of Fullerton is the Lead Agency on the project, and the Planning Commission is the advisory body to the City Council, which is the decision-making body for the applications associated with the proposed project.

WHEREAS, the City provided a Notice of Intent to Adopt a Mitigated Negative Declaration to all owners, as well as to all properties within 300 feet of the project site and to potentially interested public agencies and to the Orange County Clerk-Recorder advertising a 20-day public review period.

WHEREAS, comments on the Mitigated Negative Declaration were received and responses to comments were prepared and made available as an attachment to the project.

WHEREAS, the Planning Commission considered the information contained in the Mitigated Negative Declaration dated November 2025, Technical Appendices and the responses to comments.

WHEREAS, on December 10, 2025, the Planning Commission approved the Major Site Plan and recommended that the City Council adopt the Mitigated Negative Declaration for the Cedarwoods Fullerton Project, PRJ2025-00005.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF FULLERTON RESOLVES AS FOLLOWS:

1. The City Council, as a result of its consideration of the administrative record during the public review process, finds that the Mitigated Negative Declaration (PRJ2025-00005) adequately addresses the anticipated environmental impacts for the project, including both the Zoning Amendment (LRP-2025-0011) and Major Site Plan (ZON-2025-0013). The City Council finds no evidence from which one can fairly argue that the project will have a significant adverse effect on the environment and that the Mitigated Negative Declaration reflects the Lead Agency's independent judgement and analysis.

2. The City Council adopts the Mitigated Negative Declaration for the Cedarwoods Fullerton Project, PRJ2025-00005, located at 2461 to 2495 East Orangethorpe Avenue.

ADOPTED BY THE FULLERTON CITY COUNCIL ON FEBRUARY 3, 2026

_____
Fred Jung
Mayor

ATTEST:

_____
Lucinda Williams, MMC
City Clerk

_____
Date

Attachments:

- Exhibit A – Initial Study/Mitigated Negative Declaration dated November 2025

Cedarwoods Fullerton Project

Initial Study/Mitigated Negative Declaration

Prepared By:

Kimley-Horn and Associates, Inc.
1100 Town and Country Road, Suite 700
Orange, CA 92868

November 2025

Kimley»Horn

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1.0 INTRODUCTION AND PURPOSE

1.1 Purpose and Scope of the Initial Study

Pursuant to State California Environmental Quality Act (CEQA) Guidelines Section 15367, the City of Fullerton (City) is the Lead Agency for the Cedarwoods Fullerton Project (proposed Project or Project). The Lead Agency is the public agency that has the principal responsibility for carrying out or approving a project. The City has the authority for environmental review in accordance with CEQA and certification of the environmental documentation.

This Initial Study has been prepared to evaluate the potential environmental effects associated with the construction and operation of the proposed Project. This document has been prepared in accordance with the CEQA (California Public Resources Code [PRC] §21000 et seq.) and the State CEQA Guidelines (California Code of Regulations, Title 14, §15000 et seq). Pursuant to CEQA requirements, this Initial Study includes a description of the proposed Project; an evaluation of the Project's potential environmental impacts; the findings of the environmental analyses; and recommended mitigation measures to avoid or lessen the Project's significant adverse environmental impacts.

This Initial Study evaluates each of the environmental issue areas contained in the Environmental Checklist Form provided in Section 3.0 below. It provides decision-makers and the public with information concerning the potential environmental effects associated with the Project's construction and ongoing operations, and ways to avoid or reduce potential environmental impacts. The City will use this Initial Study as a resource when considering and taking action on the Project. Any responsible agency may elect to use this environmental analysis for discretionary actions associated with Project implementation. No trustee agencies are applicable to this Project.

1.2 Summary of Findings

Based on the Environmental Checklist Form completed for the proposed Project and supporting environmental analyses, the Project would result in no impact or a less than significant impact on the majority of the environmental issues analyzed in this Initial Study. The following environmental study areas would have no impact or a less than significant impact: Aesthetics, Agriculture and Forestry Resources, Air Quality, Biological Resources, Energy, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, Utilities and Service Systems, and Wildfire. The Project's impacts on the following issue areas would be less than significant with mitigation incorporated: Cultural Resources, Geology and Soils, Noise, and Tribal Cultural Resources. All impacts would be less than significant after mitigation.

As set forth in State CEQA Guidelines Section 15070 (Decision to Prepare a Negative or Mitigated Negative Declaration), a public agency shall prepare or have prepared a proposed negative declaration or mitigated negative declaration for a project pursuant to CEQA when:

(a) The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or

(b) The initial study identifies potentially significant effects, but:

(1) Revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review

would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and

(2) There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

1.3 Initial Study Public Review Process

The City has provided the Notice of Intent (NOI) to adopt a Mitigated Negative Declaration (MND) to the Orange County Clerk-Recorder and mailed the NOI to responsible agencies, nearby property owners, and other parties who expressed interest in receiving the NOI. In conjunction with the NOI, the City has released the Initial Study/Mitigated Negative Declaration (IS/MND) for a 20-day public review period pursuant to State CEQA Guidelines Section 15105. As the Project does not affect resources under the jurisdiction of a State trustee or responsible agency and is not considered regionally significant, a 20-day review period is appropriate. During the public review period, the IS/MND, including technical appendices, can be accessed on the City's website and is available for review at the location listed below.

https://portal.laserfiche.com/Portal/Browse.aspx?id=1539720&repo=r-3261686e

City of Fullerton
Community and Economic Development Department
303 West Commonwealth Avenue – 2nd Floor
Fullerton, CA 92382

In reviewing the IS/MND, affected public agencies and interested members of the public should focus on the adequacy of the document in identifying and analyzing the Project's potential environmental impacts and the ways in which the potentially significant impacts can be avoided or mitigated.

If public agencies or any members of the public have comments on the IS/MND, they can be sent to:

David Lopez, Senior Planner
City of Fullerton – Community and Economic Development Department
303 West Commonwealth Avenue – 2nd Floor
Fullerton, CA 92382
(714) 738-6878
david.lopez@cityoffullerton.com

Comments sent via email should include "Cedarwoods Fullerton Project" in the subject line and a valid mailing address.

Following receipt and evaluation of comments from agencies, organizations, and/or individuals, the City will determine whether the comments raise any substantial new environmental issues. If so, further documentation may be required. If not, or if the issues raised do not provide substantial evidence that the Project would have a significant effect on the environment, the IS/MND and the Project will be considered for adoption and approval, respectively.

1.4 Report Organization

This document includes the following sections:

Section 1.0 – Introduction and Purpose. This section provides an introduction and overview describing purpose of the CEQA document and the Initial Study conclusions.

Section 2.0 – Description of Proposed Project. This section includes the Project Description, which identifies the Project location, key characteristics, and includes a list of anticipated discretionary actions.

Section 3.0 – Initial Study Checklist. The Environmental Checklist Form provides an overview of the potential impacts that may or may not result from Project implementation.

Section 4.0 – Environmental Evaluation. This section contains an analysis of environmental impacts for each resource area identified in the Environmental Checklist Form.

Section 5.0 – References. The section identifies resources used to prepare the Initial Study.

2.0 DESCRIPTION OF PROPOSED PROJECT

2.1 Project Location and Setting

The Cedarwoods Fullerton project site (project site) is located in Orange County, in the southeastern portion of the City of Fullerton (City). The project is located within a largely urbanized area of the City near its boundary with the cities of Anaheim and Placentia. Regional access is provided via State Route 57 (SR-57) approximately 0.5 mile to the east and SR-91 approximately 0.4 mile to the south of the project site. **Figure 1: Regional Map** depicts the project site in a regional context.

The approximately 4.79-acre (rounded to 4.8 acres) project site is comprised of one generally rectangular-shaped developed parcel (Assessor's Parcel Number [APN] 338-172-24) located at 2461-2495 East Orangethorpe Avenue. The site is generally bordered by industrial warehouse/manufacturing uses to the north and east, Orangethorpe Avenue to the south, and a small local-serving commercial retail strip mall and towing company lot to the west. Across Orangethorpe Avenue to the south of the project site are additional industrial uses, which are within the incorporated boundaries of the City of Anaheim. Local vehicular access is currently provided directly via two driveways on Orangethorpe Avenue and one driveway at the terminus of the Cypress Way cul-de-sac, see **Figure 2: Vicinity Map**.

On-Site Land Uses

The project site is relatively flat and gradually slopes north to south from approximately 215 feet to 193 feet above mean sea level. The project site was developed in 1983 as a five-building multi-tenant business park, referred to as "Cedarwoods Business Park" and currently operates as such. The five buildings have a total of approximately 85,700 square feet of industrial and commercial uses, a surface parking lot, and landscaping, as depicted on **Figure 3: Existing On-Site Conditions**. **Table 1: Existing On-Site Land Use** summarizes the existing buildings on the site. Prior to the current development, the project site was historically used for agricultural purposes or was vacant.

Table 1: Existing On-Site Land Use

Building Type	Address/Unit
Building 1 - southwest side of the project site	
Two-story, concrete tilt-up office building	2461 East Orangethorpe Avenue, Unit 101
	2461 East Orangethorpe Avenue, Unit 102
	2461 East Orangethorpe Avenue, Unit 103
	2461 East Orangethorpe Avenue, Unit 104
	2461 East Orangethorpe Avenue, Unit 105
	2461 East Orangethorpe Avenue, Unit 200
Building 2 – west side of the project site	
Single-story, concrete tilt-up industrial building	2465/2467 East Orangethorpe Avenue
	2469 East Orangethorpe Avenue
	2471 East Orangethorpe Avenue
Building 3 – north side of the project site	
two-story, concrete tilt-up industrial building	2473 East Orangethorpe Avenue
	2475 East Orangethorpe Avenue
	2477 East Orangethorpe Avenue
	2479 East Orangethorpe Avenue

Table 1: Existing On-Site Land Use	
Building Type	**Address/Unit**
	2483 East Orangethorpe Avenue
Building 4 – east side of the project site	
single-story, concrete tilt-up industrial building	2487 East Orangethorpe Avenue
	2489 East Orangethorpe Avenue
	2491 East Orangethorpe Avenue
	2493 East Orangethorpe Avenue
Building 5 – southeast side of the project site	
two-story, concrete tilt-up office building	2495 East Orangethorpe Avenue, Unit 100
	2495 East Orangethorpe Avenue, Unit 101
	2495 East Orangethorpe Avenue, Unit 110
	2495 East Orangethorpe Avenue, Unit 200
	2495 East Orangethorpe Avenue, Unit 210
Source: Orswell & Kasman, Inc. (October, 2023). Phase I Environmental Site Assessment Report. Included as **Appendix F**.	

2.2 Existing General Plan Land Use and Zoning

The Fullerton Plan (General Plan) identifies 12 geographic focus areas in the City to concentrate potential change through community-led planning processes. The proposed Project is located within Focus Area K: Southeast Industrial, which recommends a maximum Floor Area Ratio (FAR) of 1.0 and highly recommends future development types of office and industrial uses.

General Plan Exhibit 2: Community Development Plan depicts the City's community development types (land use designations) which identifies the project site designated as Industrial (I) with a permitted 0.35 to 0.5 FAR.[1,2] The Industrial (I) designation is meant to protect and enhance the City's major employment areas by providing opportunities for manufacturing, product assembly, research and development, warehousing, and supporting uses and amenities.[3] **Figure 4: Existing Land Use Designation** depicts the existing on-site and surrounding properties' land use designations. The proposed Project is consistent with and would be an allowed use within the existing community development type. No General Plan amendment would be required.

The City of Fullerton Zoning Map depicts the City's zoning classifications and identifies that the project site is zoned Manufacturing Park with a 100,000-square-foot minimum lot size and an Emergency Shelter Overlay (MP-100-ES) on the northern portion of the site. The MP-100-ES zoning classification is intended for a wide range of light industrial activities, often based on a multi-tenant type development. The proposed Project is consistent with the existing MP-100-ES zoning classification on the northern portion of the site. On the remaining southern portion of the property, the project site is zoned Commercial Manufacturing with an Emergency Shelter Overlay (CM-ES). The CM zoning classification is intended to provide for selected areas where on- premises retail sales and services along with the related assembling, processing and manufacturing can be carried out. The proposed warehouse Project would not be an allowed use within the CM zone. Therefore, the Project would rezone the southern portion of the site to

1 City of Fullerton. (2025). *Fullerton - GoZone GIS Webtool*. Available at: https://gis.cityoffullerton.com/portal/apps/webappviewer/index.html?id=38a7db5f8a8748b1818bc31269bfa3b0
2 Maximum FAR increase based on focus area policies
3 City of Fullerton. (2012). *The Fullerton Plan, Page 125*

MP-100-ES. The ES Overlay would remain on the entirety of the site. **Figure 5: Existing Zoning Classifications** and **Figure 6: Proposed Zoning Classification** depicts the existing and proposed zoning districts for the project site and surrounding properties. In addition, the existing community development types and zoning districts are summarized in **Table 2: Existing Surrounding Land Use Designations and Zoning.**

Table 2: Existing Surrounding Land Use Designations and Zoning

Direction	Community Development Type (land use designation)	Zone Classification
Project Site	Industrial	Manufacturing Park with a 100,000 square-foot minimum lot size (MP-100) Commercial Manufacturing (CM) Emergency Shelter Overlay (ES)
North	Industrial	Manufacturing Park with a 200,000 square-foot minimum lot size (MP-200)
South	City of Anaheim: Industrial (I-L)	City of Anaheim: Industrial
East	Industrial	Manufacturing Park with a 100,000 square-foot minimum lot size (MP-100)
West	Industrial	Manufacturing, General (MG) Commercial Manufacturing (CM) Emergency Shelter Overlay (ES)

Sources:
City of Fullerton. *Fullerton - GoZone GIS Webtool*. Available at: https://gis.cityoffullerton.com/portal/apps/webappviewer/index.html?id=38a7db5f8a8748b1818bc31269bfa3b0. Retrieved July, 2025
City of Anaheim. *Zoning and General Plan Viewer*. Available at: https://gis.anaheim.net/portal/apps/webappviewer/index.html?id=a5931cb4134b4a7ebf5a629e95f56e8f. Retrieved July, 2025

2.3 Project Characteristics

Site Development

The Applicant is proposing the demolition of the existing approximately 85,700-square-foot Cedarwoods Business Park and the construction and operation of a new 110,232-square-foot warehouse/distribution facility with a gated truck court, surface parking lot, and landscaping. The proposed building would consist of 100,232 square feet of warehouse space and 10,000 square feet of ancillary office space. The office space would be split evenly between the ground level and mezzanine with one area on the north of the building and one area on the south of the building to maximize flexibility for a future tenant. Consistent with the proposed MP-100-ES zoning district, the proposed structure would be a concrete tilt-up warehouse building and would have a maximum roof line of approximately 44 feet in height, inclusive of the parapet, and a FAR of 0.53. A solar photovoltaic (PV) system would be installed on the roof over the office areas of the warehouse. The office areas are the only areas that are being proposed to be mechanically ventilated. The Project would have 91 passenger vehicle parking stalls on the north and west perimeters of the site. The truck court, which is proposed to have 15 dock doors, would be located on the west side of the building; see **Table 3: Building Summary**. Additional site components would include a trash enclosure, pump house, and bike racks to be located near the ancillary office spaces in the warehouse building. See **Figure 7: Conceptual Site Plan**.

Table 3: Building Summary

Warehouse (sf)	Office (sf)	Mezzanine Office (sf)	Total Building (sf)	Loading Docks	Automobile Parking Stalls	
					Required[1]	Proposed
100,232	5,000	5,000	110,232	15	91	91

[1] Warehouse parking space requirement 1 space for every 2,000 sf, Office parking space requirement 1 space for every 250 sf.
sf = square feet
Source: Fullerton Municipal Code (FMC) Chapter 15.40

The proposed Project is currently planned as a "speculative project." Therefore, the future tenants of the building are not currently known. Without knowing the identity of a future tenant, the exact number of future employees or hours of operation cannot be determined. Therefore, this IS/MND and associated technical reports use approximate potential on-site employees, hours of operation, and vehicular traffic generation based on the proposed Project's characteristics (i.e., square footage). This IS/MND and the associated technical reports have assumed uses and intensities that may be greater than what might actually be expected at buildout and operation, which provide a conservative estimation of impacts.

Circulation and Parking

The proposed warehouse facility would continue to provide vehicular access from two driveways on East Orangethorpe Avenue and one driveway at the terminus of the Cypress Way cul-de-sac. Passenger vehicles would have access to the project site from the three driveways. The driveway off of Cypress Way would be a 64-foot-wide truck ingress and egress point that would provide access to the gated truck court on the west side of the building, as well passenger vehicle parking. The Cypress Way driveway would also have an 8-foot high rolling gate and knox pad lock. The western driveway along Orangethorpe Avenue would be 40 feet wide and allow for truck ingress and egress. The western driveway would also provide access to the gated truck court and passenger vehicle parking. The eastern driveway along Orangethorpe Avenue would be 26 feet wide with an 8-foot high rolling gate and knox pad lock, which would exclusively allow for passenger and emergency vehicle ingress and egress. The eastern driveway would provide access to the drive aisle along the eastern perimeter of the site which would lead to passenger vehicle parking. All internal drive aisles would be 26 feet wide and accommodate standard fire lane turning radiuses and hammerhead turnaround maneuvers for emergency vehicles and fire services. All entry gates on the project site would be equipped with knox boxes for access by the City of Fullerton Fire Department and Police Department for emergencies.

Consistent with the Fullerton Municipal Code (FMC) Table 15.40.050.A, the Project would provide 91 vehicle parking spaces: 44 standard stalls, 26 compact stalls, 4 electric vehicle charging stations (EVCS), 13 electric vehicle capable stalls, and 4 Americans with Disabilities Act (ADA) stalls for employee and visitor parking. Passenger vehicle parking stalls are proposed on the north and west perimeters of the project site. The gated truck court would be located on the west side of the warehouse and would be secured by 8-foot-high rolling gates. Pedestrian access within the project site would be provided by sidewalks. Existing pedestrian sidewalks along Orangethorpe Avenue would remain.

Building Design, Landscaping, Lighting

The conceptual design for the Project includes concrete tilt-up panels with architectural treatments, such as panel reveals, variation in façade material, and horizontal and vertical articulations to provide visual relief on the building facades, as shown in **Figure 8: Conceptual Elevations**. The exterior elevations would be white and grey with blue window glazing. Rooftop mechanical equipment would be screened, if visible

from the public right-of-way. Consistent with FMC Table 15.40.040.B, a retaining wall would be located along a portion of the western perimeter of the site and an 8-foot-high wrought iron fence would be located along the western perimeter of the site containing the truck court area, the eastern half of the northern perimeter of the site, and the entirety of the eastern perimeter of the site.

The Project would be subject to compliance with the development standards in FMC Section 15.40.040, which include requirements for building setbacks. Consistent with the FMC, the proposed warehouse would be set back over 20 feet from Orangethorpe Avenue. The Project would also be subject to compliance with the development standards in FMC Section 15.40.040.F, which include requirements for landscaping and FMC Chapter 15.50, which outline additional landscaping and irrigation requirements. The Project would provide a total of 19,109 square feet of landscaping, which would include ground cover, shrubs, and trees focused near parking lot areas, the warehouse, site perimeter, and driveway entries, see **Figure 9: Conceptual Landscape Plan**.

Site lighting would be used to provide adequate lighting for circulation, safety, and security. All project site entries, exits, parking areas, loading areas, trash enclosures, outdoor areas, and pedestrian pathways would include dusk to dawn lighting for security purposes. Lighting provided to illuminate any parking area shall be arranged so as to reflect the light and glare away from adjacent properties.

Utility and Off-Site Improvements

The Project would connect with the existing utility infrastructure, including water service, sanitary sewer service, storm drain infrastructure, and electrical, as depicted in **Figure 10: Conceptual Utility Plan**. The City of Fullerton would continue to provide water service to the project site via connection to an existing 12-inch water main in Orangethorpe Avenue and an 8-inch water main in Cypress Way. The Project proposes water connections for domestic water, fire protection, and landscape irrigation. The Project includes relocation of the existing on-site water loop. The City of Fullerton would also continue to provide sewer service to the project site via connection to an existing 8-inch sanitary sewer main in Cypress Way. A secondary point of connection may be extended to an existing City of Placentia sewer main in Orangethorpe Avenue. The Project does not propose connection to or use of natural gas. The project site is currently served and would continue to be served by Southern California Edison (SCE).

Roadway Improvements

Along Orangethorpe Avenue, the existing western driveway would be relocated resulting in the construction of a new driveway with sidewalk and curb and gutter improvements and reconstruction at the existing driveway location. The existing eastern driveway on Orangethorpe Avenue would remain in its existing location and configuration.

Construction

Project construction is expected to commence in late 2027 with a duration of approximately 13 months completed in one phase. Approximately 929 cubic yards (cy) of fill are anticipated. The final grading plan would be reviewed and approved by the City prior to grading permit issuance.

2.4 Discretionary Actions and Approvals

The following discretionary actions and/or approvals are required for the proposed Project:

City of Fullerton

- **Adoption of the Initial Study/Mitigated Negative Declaration**. The proposed Project requires CEQA compliance through the adoption of an IS/MND prior to Project approval. This Initial Study and the proposed MND would serve as the primary environmental document for all actions associated with approval of the Cedarwoods Fullerton Project.
- **Zoning Amendment (LRP-2025-0011).** The Project would require a zoning amendment on the southern portion of the parcel from Commercial Manufacturing with an Emergency Shelter Overlay (CM-ES) to Manufacturing Park with a 100,000 square-foot minimum lot size and an Emergency Shelter Overlay (MP-100-ES) to be consistent with the northern half of the parcel.
- **Major Site Plan (ZON-2025-0013).** The Project requires review of the site improvements and compliance with the applicable development standards.

Other

- **Santa Ana Regional Water Quality Control Board (Regional Board).** National Pollutant Discharge Elimination System (NPDES) Compliance/Low Impact Development (LID) approvals.
- **City of Placentia.** Project may extend a point of connection from the site to a City of Placentia owned sanitary sewer main line in Orangethorpe Avenue. A sewer permit would be required.

Other permits required for the Project may include, but are not limited to, issuance of encroachment permits for driveways, sidewalks, signs, building permits, grading permits, demolition permits, tenant improvement permits, and permits for new utility connections.

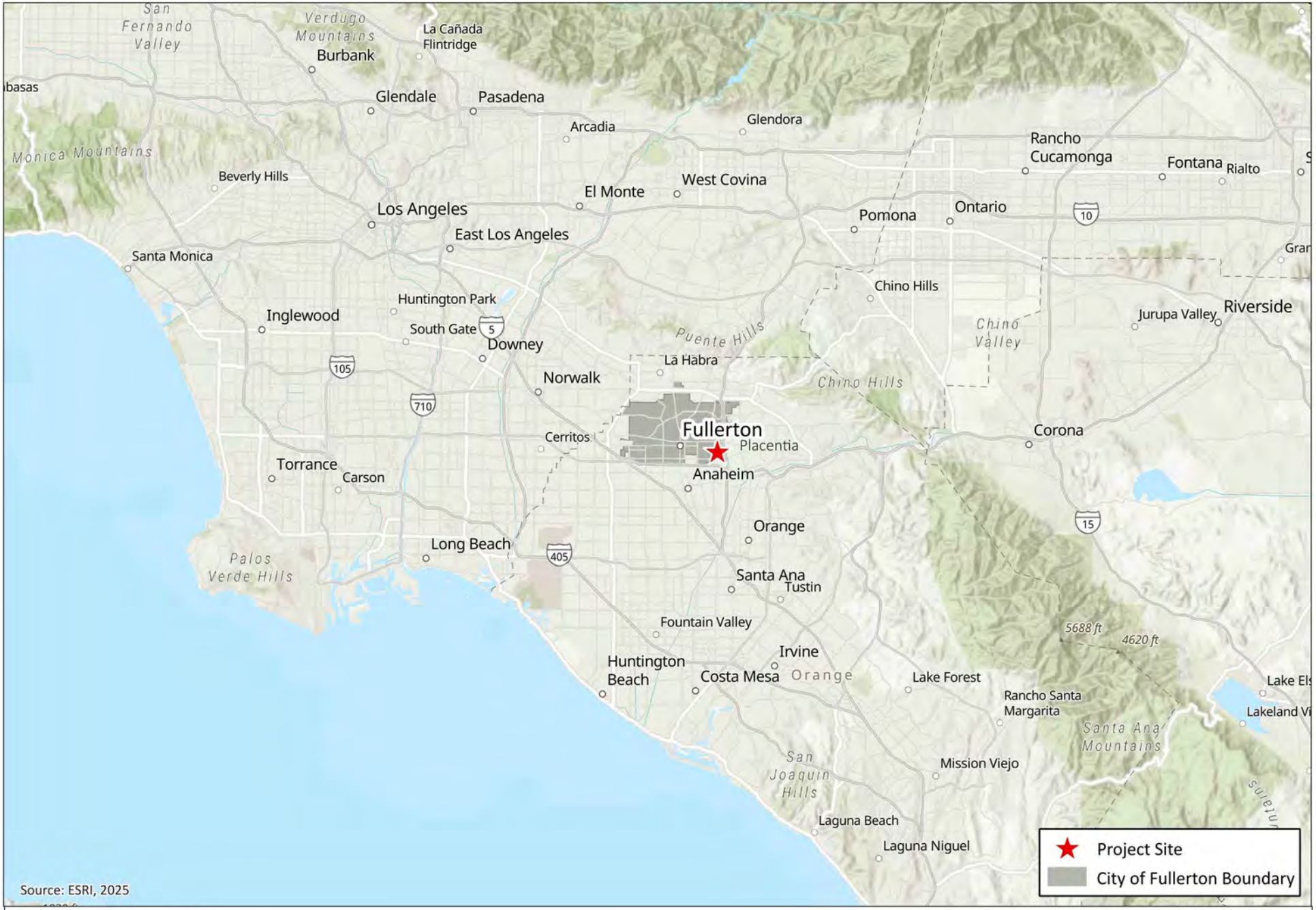


Figure 1: Regional Map
Cedarwoods Fullerton Project

Not to scale.

Kimley»Horn

Figure 2: Vicinity Map
Cedarwoods Fullerton Project

Not to scale.

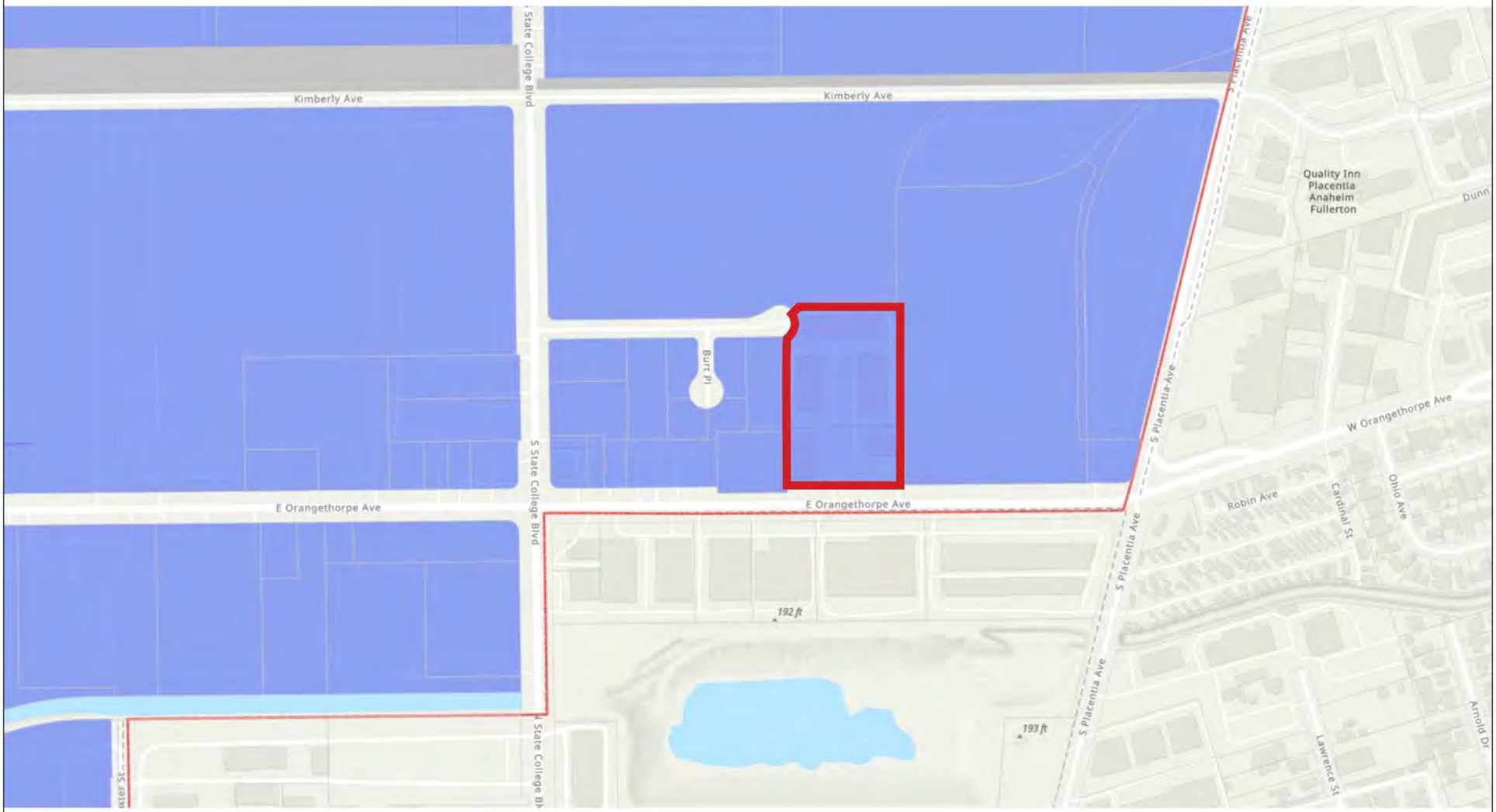
Kimley»Horn

Source: SKH Architect, 2025

Figure 3: Existing On-Site Conditions
Cedarwoods Fullerton Project

Not to scale.

Kimley»Horn

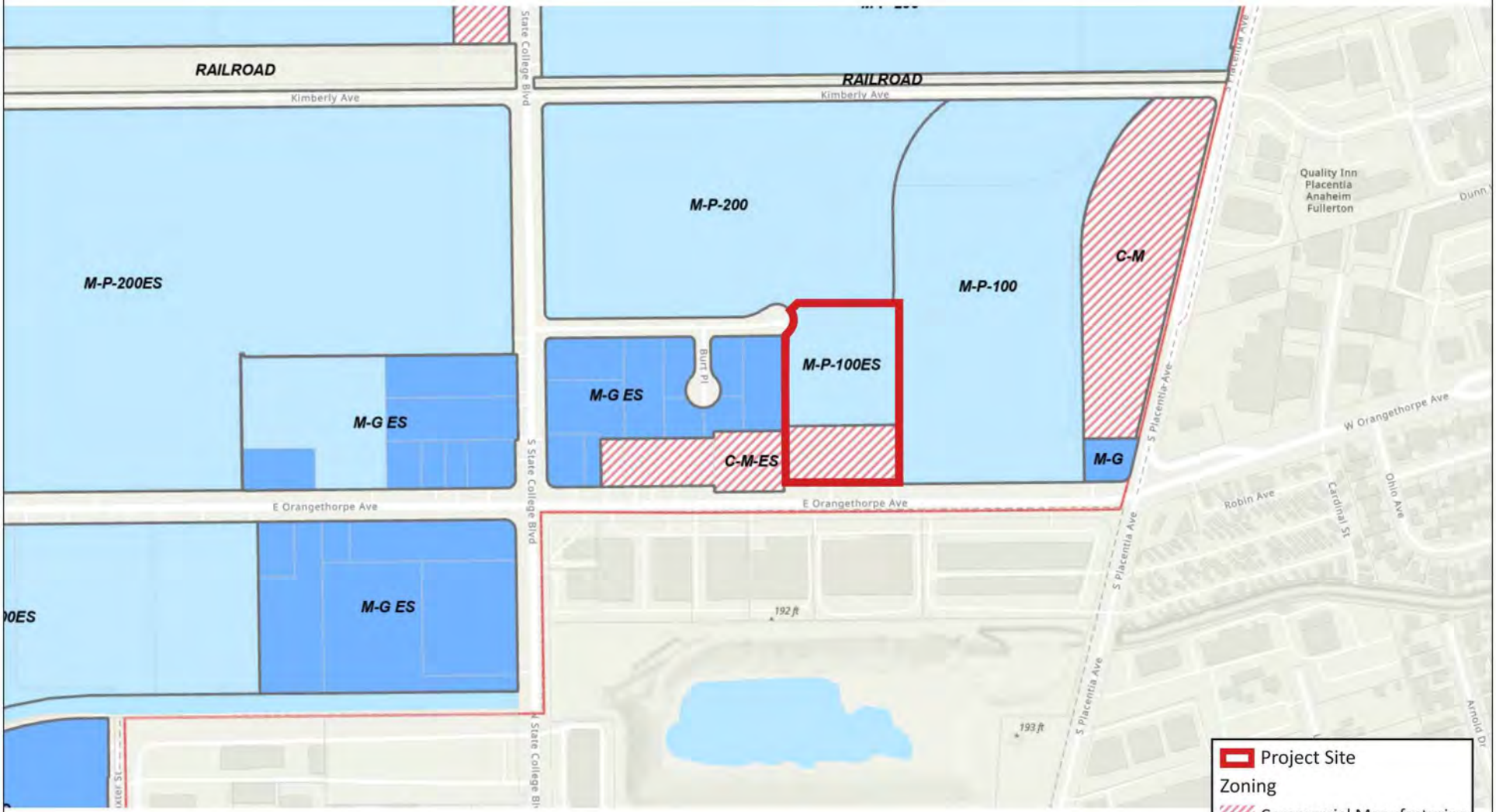


Source: City of Fullerton - Go Zone, 2025

Figure 4: Existing Land Use Designation
Cedarwoods Fullerton Project

Not to scale.

Kimley»Horn



Source: City of Fullerton - Go Zone, 2025

Figure 5: Existing Zoning Classifications
Cedarwoods Fullerton Project

Not to scale.

Kimley»Horn

Source: City of Fullerton - Go Zone, 2025

Figure 6: Proposed Zoning Classification
Cedarwoods Fullerton Project

Not to scale.

Kimley»Horn

Source: SKH Architect, 2025

PROJECT DATA

	Fullerton			
SITE AREA			[illegible]	SF
			[illegible]	Acres
BUILDING AREA				
1ST FLOOR	WAREHOUSE		[illegible]	SF
	OFFICE		[illegible]	SF
1ST TOTAL			[illegible]	SF
2ND FLOOR	OFFICE		[illegible]	SF
TOTAL			[illegible]	SF
PROJECT FACT				
	FAR PROVIDED			0.53
	CLEAR HEIGHT			36'
	BLDG HEIGHT			42'
ZONING				
ZONE EXISTING				[illegible]
ZONE PROPOSED				MP-100
MAX BUILDING HEIGHT				40'
SET BACK				
	STREET	20'		
	SIDE	0'		
	REAR	0'		
PARKING REQ				
	AUTO PARKING			
	SIZE			[illegible]
	WAREHOUSE	1 PER 2000		51
	OFFICE	1 PER 250		40
	TOTAL			[illegible]
PROJECT PROVIDED				
PARKING PROVIDED				
	AUTO PARKING			
	STANDARD		[illegible]	[illegible]
	ADA STD		[illegible]	2
	ADA VAN		[illegible]	2
	COMPACT		[illegible]	[illegible]
	EVCS VAN		[illegible]	1
	EVCS STD		[illegible]	[illegible]
	EV CAPABLE		[illegible]	[illegible]
	TOTAL			[illegible]

GENERAL NOTES

1. ALL DIMENSIONS ARE TO FACE OF CONCRETE WALL, FACE OF CONCRETE CURB OR GRID LINES UNLESS NOTED OTHERWISE.
2. ENTIRE PROJECT SHALL BE PERMANENTLY MAINTAINED WITH A SMART AUTOMATIC IRRIGATION SYSTEM.
3. SEE CIVIL DRAWINGS FOR ADDITIONAL INFORMATION REGARDING SITE DRAINAGE, TOPOGRAPHY AND UTILITIES.
4. FOR PAVING SECTIONS, CONCRETE CURBS, SWALES AND GUTTERS SEE CIVIL DRAWINGS.
5. PROPERTY LINE ARE REFERENCE ONLY. REFER TO CIVIL DRAWINGS FOR HORIZONTAL CONTROL.
6. LANDSCAPE AREAS SHALL BE DELINEATED WITH A MIN. 6" CONCRETE CURB.

KEYNOTES

1. SITE PAVING WITH HEAVY BROOM FINISH. SEE CIVIL
2. DECORATIVE PAVEMENT AT ENTRY - COLORED CONCRETE W/ SAW CUT PATTERN
3. PRIMARY BUILDING
4. PEDESTRIAN CONCRETE WALKWAY WITH MEDIUM BROOM FINISH
5. RETAINING WALL.
6. 8'H WROUGHT IRON FENCE.
7. 8'H BLACK PAINTED VEHICULAR ROLLING GATE WITH KNOX PAD LOCK. MANUALLY OPERATED. PROVIDE CONDUITS FOR FUTURE OPERATOR
8. 5'-6" X 6' X 4" THICK CONCRETE LANDING PAD AT ALL EXTERIOR MANDOORS WITH MEDIUM BROOM FINISH.
9. NOT USED
10. NOT USED
11. TRASH ENCLOSURE
12. PUMP HOUSE
13. EXTERIOR CONCRETE STAIR
14. APPROXIMATE LOCATION OF ELEC. TRANSFORMER WITH BOLLARD PROTECTION AND LANDSCAPE SCREENING
15. NOT USED.
16. SHORT TERM - BICYCLE RACK 5% OF PARKING STALL
17. DESIGNATED SMOKING AREA - 25' AWAY FROM ANY ENTRY

LEGEND

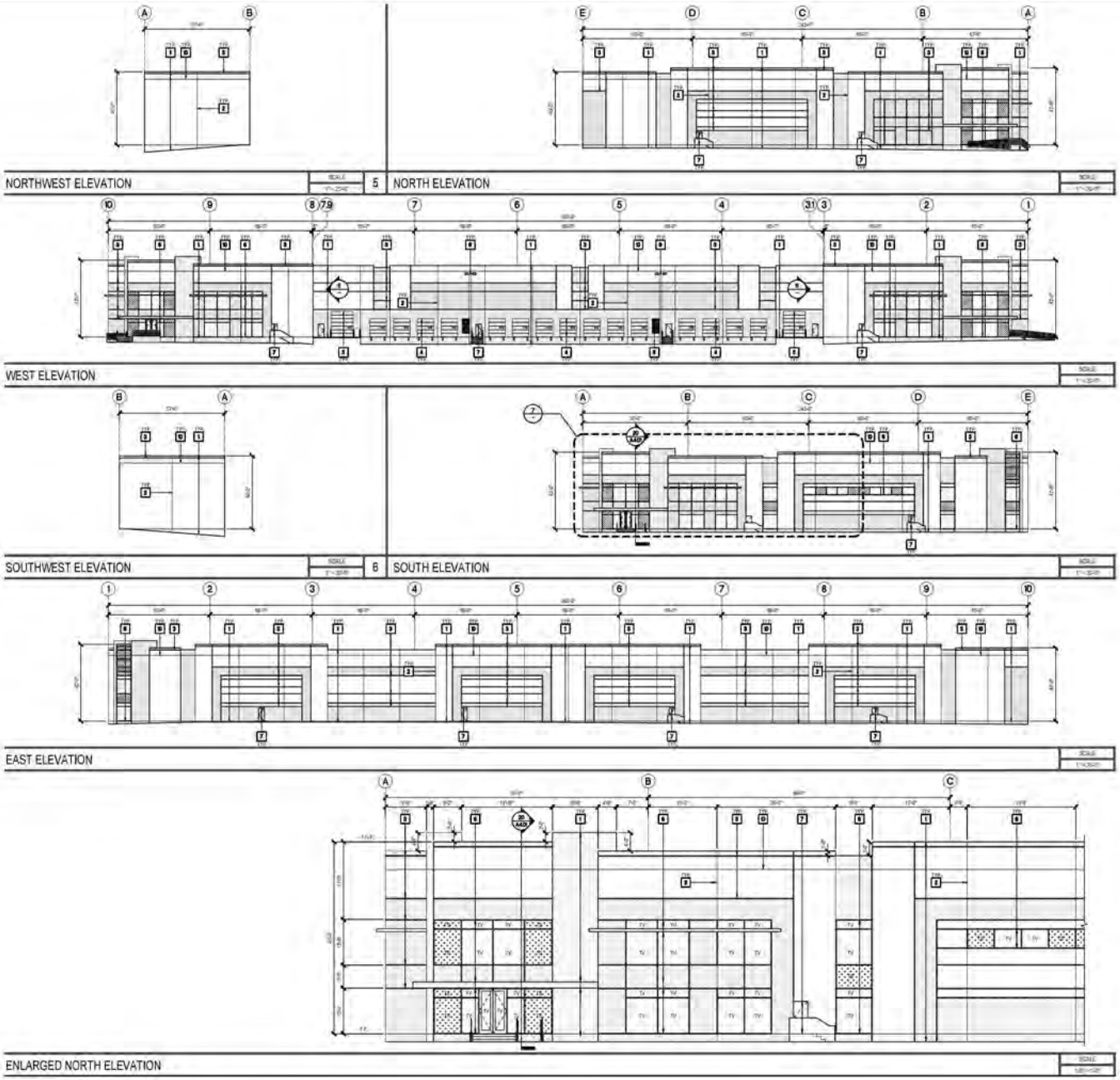
- STANDARD PARKING STALL 8'-6" X 19'
- COMPACT PARKING STALL 8'-0" X 16'
- ADA PARKING VAN 12' X 19' WITH 5' CLR AISLE
- VAN (12'X19') EVCS WITH ISA SIGN AND MARKING "EV CHARGING ONLY" WITH 5' ACCESSIBLE AISLE.
- STANDARD EVCS PARKING STALL 8'-6" X 19'
- STANDARD EV CAPABLE PARKING STALL 8'-6" X 19'
- PROPERTY LINE
- ACCESSIBLE PATH OF TRAVEL, MAX 5% SLOPE AND MAX 2% CROSS SLOPE WITH 48" MIN. CLEAR, UNLESS NOTED OTHERWISE WITH ADA ACCESSIBLE RAMP
- LANDSCAPE, SEE LANDSCAPE DRAWINGS

Figure 7: Conceptual Site Plan

Cedarwoods Fullerton Project

Not to scale.

Kimley»Horn



GENERAL NOTES

1. ALL PAINT COLOR CHANGES TO OCCUR AT INSIDE CORNERS UNLESS NOTED OTHERWISE.
2. ALL PAINT FINISHES ARE TO BE FLAT UNLESS NOTED OTHERWISE.
3. STOREFRONT CONSTRUCTION, GLASS, METAL ATTACHMENTS AND LINTELS SHALL BE DESIGNED TO RESIST WIND EXPOSURE "C" WINDS. CONTRACTOR SHALL SUBMIT SHOP DRAWINGS PRIOR TO INSTALLATION.
4. CONTRACTOR SHALL FULL PAINT ONE CONCRETE PANEL WITH SELECTED COLORS. ARCHITECT AND OWNER SHALL APPROVE PRIOR TO PAINT REMAINDER OF BUILDING.
5. BACK SIDE OF PARAPETS TO HAVE SMOOTH FINISH AND BE PAINTED WITH ELASTOMERIC PAINT.
6. FOR SPANDREL GLAZING, ALLOW SPACE BEHIND SPANDREL TO BREATH BY PROVIDING A MINIMUM 3" DIAMETER HOLE ON THE CORNER.
7. USE ADHESIVE BACK WOOD STRIPS FOR ALL REVEAL FORMS.
8. FIRST COAT OF PAINT TO BE ROLLED ON AND THE SECOND COAT TO BE SPRAYED ON.
9. WATER BLAST EXTERIOR FACE OF BUILDING WALLS PRIOR TO PAINT.
10. ALL CONCRETE PANEL JOINTS SHALL BE CLEARED OF DEBRIS BY PRESSURING WASHING THE CAVITY AND GRIND ANY SHARP EDGES PRIOR TO APPLY PANEL CAULK JOINT.
11. ALL EXTERIOR DOORS AND LOUVERS SHALL BE FABRICATED AND WEATHER STRIPPED TO WITHSTAND WIND EXPOSURE "C"
12. CONTRACTOR TO PROVIDE MOCK UP PAINT FOR OWNER AND ARCHITECT'S APPROVAL PRIOR TO COMMENCING THE WORK.

KEYNOTES

1. CONCRETE TILT UP WALL, SEE PAINT AND FINISH LEGEND BELOW
2. CONCRETE PANEL JOINT
3. PAINTED CONCRETE REVEAL
4. 9' X 10' OVER HEAD DOCK HIGH DOOR
5. 12' X 14' OVER HEAD GRADE LEVEL DOOR
6. ALUMINUM STOREFRONT GLAZING SYSTEM. SEE GLAZING LEGEND
7. 3'X7' HOLLOW METAL DOOR AND FRAME
8. 4'X8' PAINTED METAL LOUVER
9. ROOF DRAIN
10. ROOF LINE BEYOND

GLAZING LEGEND

TEMPERED VISION GLASS

TEMPERED CONCRETE BACKED SPANDREL GLASS

OFFICE / POTENTIAL OFFICE AREAS:
VITROGLAZING VISTACOOL (2) PACIFICA + SOLARBAN 60 (3)
VLT: .26, SHGC: 0.17, U VALUE: 0.29
1" INSULATED UNIT WITH ½" AIRSPACE AND (2) ¼" UNITS

WAREHOUSE GLAZING AREA:
SINGLE PANE ¼" VITROGLAZING VISTALCOOL PACIFICA.

COLOR / FINISH LEGEND

PAINTED CONCRETE SHERWIN-WILLIAMS SW 7005 PURE WHITE

PAINTED CONCRETE SHERWIN-WILLIAMS SW 2819 DOWNING SLATE

PAINTED CONCRETE SHERWIN-WILLIAMS SW 7076 CYBERSPACE

FITZGERALD FORMLINERS, 16021 PAINTED W/ SW 7076 CYBERSPACE

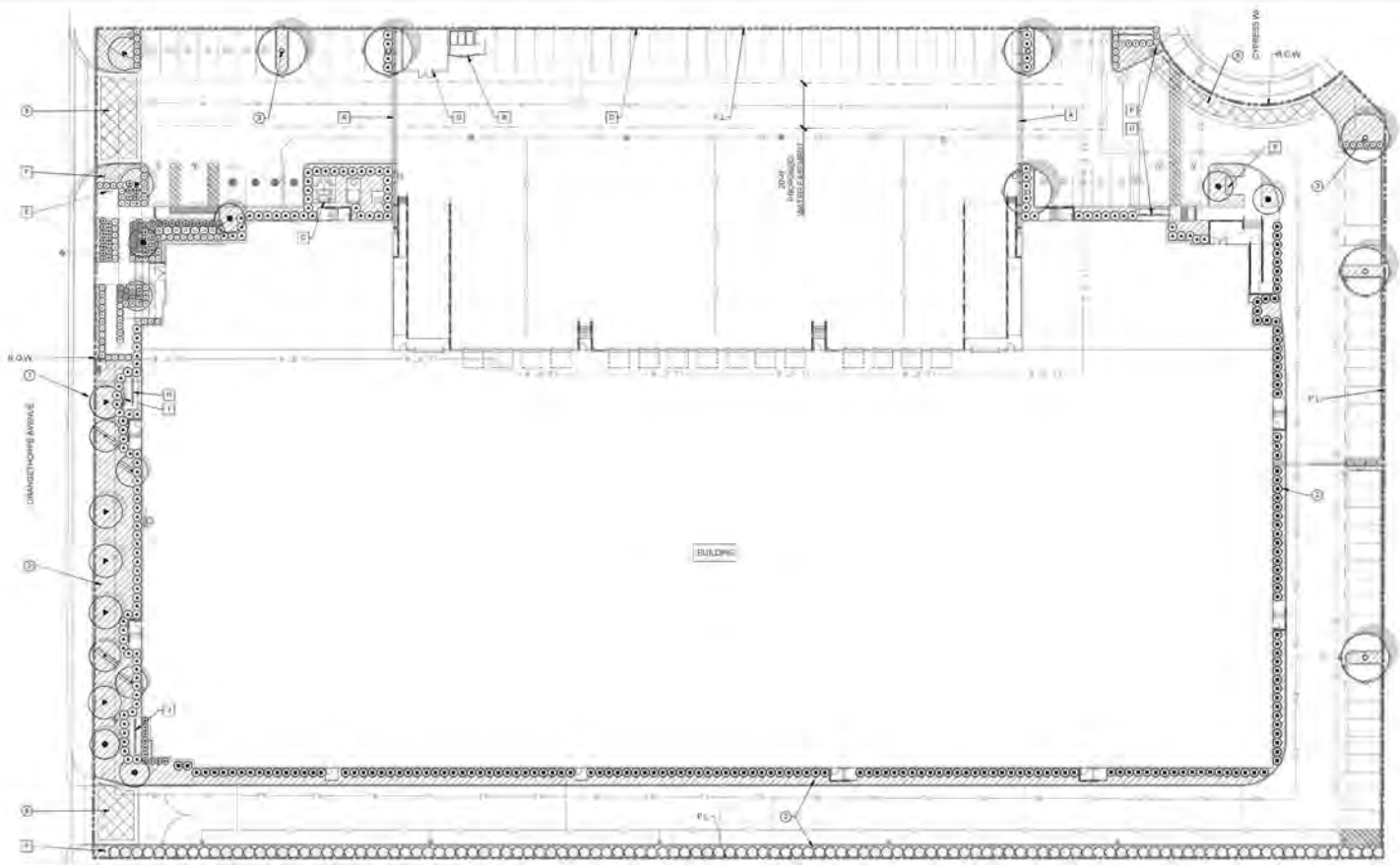
CANOPY: REYNOBOND ACM DURAGLOSS 5000 PROGRAM WHITE

Source: SKH Architect, 2025

Figure 8: Conceptual Elevations
Cedarwoods Fullerton Project

Not to scale.

Kimley»Horn



CONCEPTUAL PLAN NOTE:

THIS IS A CONCEPTUAL LANDSCAPE PLAN. IT IS BASED ON PRELIMINARY INFORMATION WHICH IS NOT FULLY VERIFIED AND MAY BE INCOMPLETE. IT IS MEANT AS A COMPARATIVE AID IN EXAMINING ALTERNATE DEVELOPMENT STRATEGIES AND ANY QUANTITIES INDICATED ARE SUBJECT TO REVISION AS MORE COMPLETE INFORMATION BECOMES AVAILABLE.

IRRIGATION NOTE:

THE PROJECT WILL BE EQUIPPED WITH A LOW FLOW IRRIGATION SYSTEM CONSISTING OF ET WEATHER BASED SMART CONTROLLER, LOW FLOW ROTORS, BUBBLER AND/OR DRIP SYSTEMS USED THROUGHOUT. THE IRRIGATION WATER EFFICIENCY WILL MEET OR SURPASS THE CURRENT STATE MANDATED AB-1881 WATER ORDINANCE.

GENERAL NOTES:

- ROCK RIP-RAP MATERIAL SHALL BE INSTALLED WHERE DRAIN LINES CONNECT TO INFILTRATION AREAS.
- ALL UTILITY EQUIPMENT SUCH AS BACKFLOW UNITS, FIRE DETECTOR CHECKS, FIRE CHECK VALVE, AND AIR CONDITIONING UNITS WILL BE SCREENED WITH EVERGREEN PLANT MATERIAL ONCE FINAL LOCATIONS HAVE BEEN DETERMINED.

DESIGN KEY NOTES:

1. NEW STREET TREE PER TREE LEGEND.
2. DROUGHT TOLERANT SHRUB AND GROUND COVER PLANTING PER LEGEND. ALL SHRUB PLANTING AREAS TO RECEIVE A 3" LAYER OF SHREDDED WOOD MULCH.
3. PROPOSED PARKING LOT SHADE TREE PER TREE LEGEND.
4. FOUNDATION SHRUB PLANTING PER LEGEND.
5. ALL TREES LOCATED 5' OR LESS TO CURB, WALKWAY OR WALL SHALL BE INSTALLED WITH DEEP ROOT BARRIER PANELS, 18" MIN. DEPTH X 10' WIDE PANEL.
6. ENHANCED PAVING AT VEHICULAR ENTRY.
7. ENHANCED PAVING AT BUILDING ENTRY.

REFERENCE KEY NOTES:

- A. VEHICULAR ROLLING GATE PER ARCH. PLANS.
- B. TRASH ENCLOSURE PER ARCH. PLANS.
- C. ELECTRICAL TRANSFORMER PER ELECTRICAL PLANS.
- D. 8' HIGH WROUGHT IRON FENCE PER ARCH. PLANS.
- E. BIKE RACK PER ARCH. PLANS.
- F. MONUMENT SIGN PER ARCH. PLANS.
- G. PUMP HOUSE PER ARCH. PLANS.
- H. DOMESTIC WATER BACKFLOW PREVENTOR PER CIVIL PLANS.
- I. IRRIGATION BACKFLOW PREVENTOR PER CIVIL PLANS.
- J. DOUBLE CHECK DETECTOR VALVE ASSEMBLY AND WATER METER PER CIVIL PLANS.

GROUND COVERS

SYMBOL	NAME	WUCOLS
	CAREX DIVULSA, BERKELY SEDGE 1 GAL. SIZE @ 18" O.C.	L
	ROSMARINUS O. 'PROSTRATUS', CREEPING ROSEMARY 1 GAL. SIZE @ 36" O.C.	L
	BACCHARIS P. 'TWIN PEAKS', COYOTE BRUSH 1 GAL. SIZE @ 36" O.C.	L
	LANTANA MONTEVIDENSIS, PURPLE LANTANA 1 GAL. SIZE @ 30" O.C.	L
	HESPERALOE PARVIFLORA, RED YUCCA 1 GAL. SIZE @ 36" O.C.	L
	DIANELLA TASMANICA 'VARIEGATA', WHITE STRIPED TASMAN FLAX LILY 1 GAL. SIZE @ 24" O.C.	M
	LANTANA C. 'NEW GOLD', GOLD SPREADING LANTANA 1 GAL. SIZE @ 36" O.C.	L
	SALVIA LEUCANTHA, MEXICAN BUSH SAGE 1 GAL. SIZE @ 42" O.C.	L
	MUHLENBERGIA RIGENS, DEER GRASS 1 GAL. SIZE @ 36" O.C.	M
	SALVIA GREGGII, AUTUMN SAGE 1 GAL. SIZE @ 36" O.C.	L

SHRUBS - SHRUBS SHALL CONSIST OF THE FOLLOWING:

SYMBOL	SHRUB NAME	WUCOLS
	ALOE STRIATA, CORAL ALOE 5 GAL. SIZE	L
	CALLISTEMON 'LITTLE JOHN', DWARF BOTTLEBRUSH 5 GAL. SIZE	L
	OLEA E. 'LITTLE OLLIE', DWARF OLIVE 5 GAL. SIZE	L
	SALVIA GREGGII, AUTUMN SAGE 5 GAL. SIZE	L
	SALVIA LEAUCANTHA, MEXICAN BUSH SAGE 5 GAL. SIZE	L
	LEUCOPHYLLUM LANGMANIAE, RIO BRAVO RANGER 5 GAL. SIZE. @ 60" O.C.	L
	LEUCOPHYLLUM F. 'GREEN CLOUD', TEXAS RANGER 5 GAL. SIZE. @ 60" O.C.	L
	LIGUSTRUM J. 'TEXANUM', TEXAS PRIVET 5 GAL. SIZE. @ 48" O.C.	M
	ROSMARINUS 'TUSCAN BLUE', TUSCAN BLUE ROSEMARY 5 GAL. SIZE @ 48" O.C.	L

TREES

SYMBOL	TREE NAME	QTY.	WUCOLS
	PARKING LOT SHADE TREE RHUS LANCEA, AFRICAN SUMAC 24" BOX SIZE, STANDARD TRUNK.	7	L
	EVERGREEN SCREEN TREE PINUS ELDARICA, MONDELL PINE 24" BOX SIZE, STANDARD TRUNK.	4	L
	CHILOPSIS LINEARIS, DESERT WILLOW 24" BOX SIZE, STANDARD TRUNK.	7	L
	OLEA E. , OLIVE TREE 36" BOX SIZE, STANDARD TRUNK.	7	L

LANDSCAPE AND PARKING MATRIX
91 STALLS PROPOSED
25 SF LANDSCAPE / STALL = 2,300 SF OF LANDSCAPE REQ'D
10,109 SF LANDSCAPE PROPOSED
OPEN PARKING AREA = 14,307 SF
8% OF OPEN PARKING AREA = 1,144 SF
PER FMC CHAPTER 15.50 AND SECTION 15.40.050.F.2.a -
LANDSCAPE AREA TO EQUAL A MIN. OF 25 SQUARE FEET PER PARKING SPACE, OR 8% OF THE SQUARE FOOTAGE OF THE OPEN PARKING AREA WHICHEVER IS GREATER.

WUCOLS PLANT FACTOR
THIS PROJECT IS LOCATED IN 'WUCOLS' REGION 3-SOUTH INLAND COASTAL'.

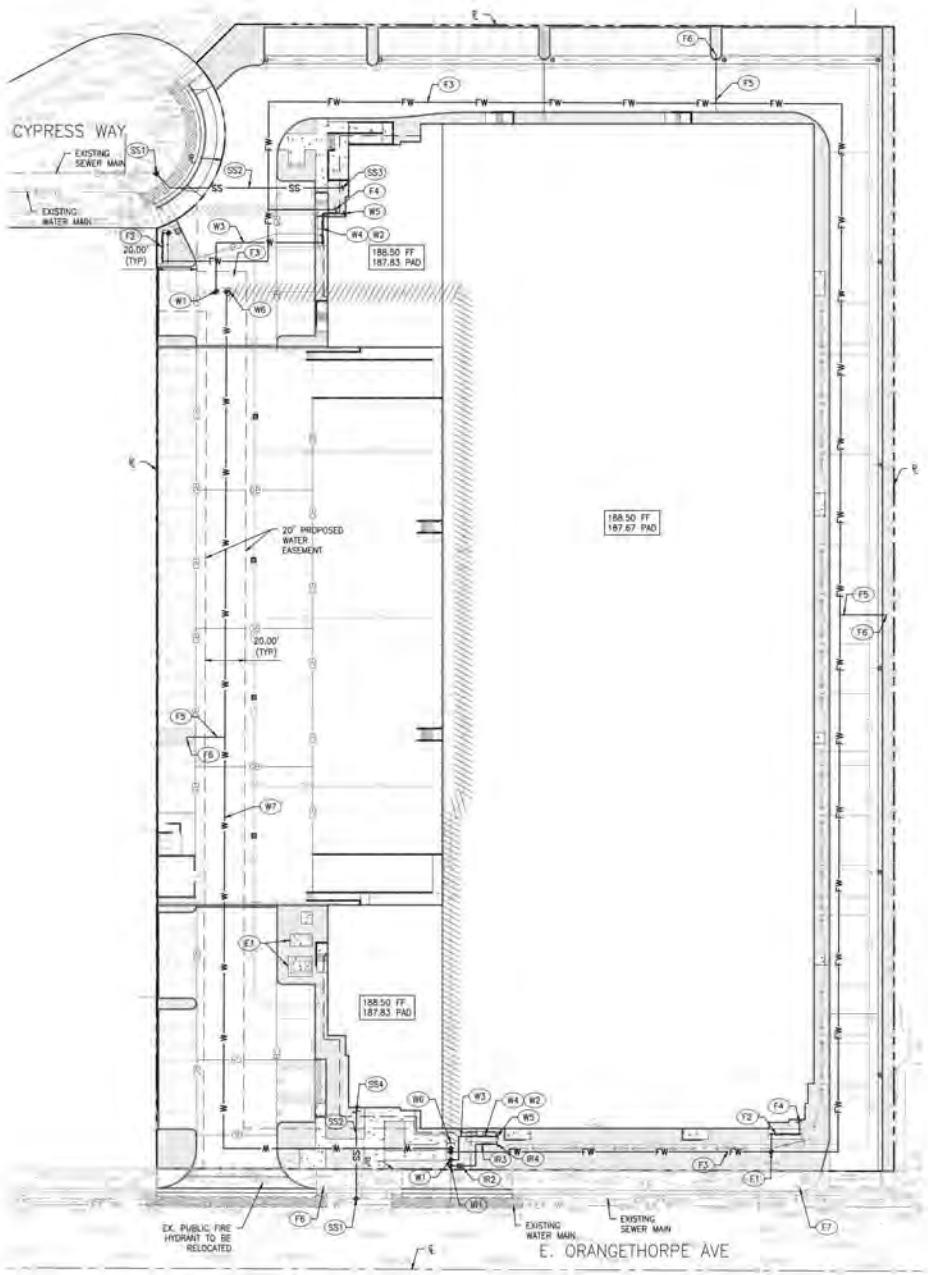
H = HIGH WATER NEEDS
M = MODERATE WATER NEEDS
L = LOW WATER NEEDS
VL= VERY LOW WATER NEEDS

Source: Rodarte Landscape Architecture, 2025.

Figure 9: Conceptual Landscape Plan
Cedarwoods Fullerton Warehouse Project

Not to scale.

Kimley»Horn



LEGEND

- LANDSCAPE AREA BY OTHERS
- PEDESTRIAN CONCRETE
- ASTROTURF
- PERMEABLE PAVEMENT BY OTHERS
- RETAINING WALL
- PROPERTY LINE
- GRADE BREAK
- RIDGE LINE
- FLOW LINE
- CATCH BASIN
- AREA DRAIN
- GARDEN WALL
- POINT OF CONNECTION
- COORDINATION POINT
- BACKFLOW ASSEMBLY
- WATER METER VAULT
- FIRE DEPARTMENT CONNECTION (FDC)
- FW — FIRE WATER PIPE
- STORM DRAIN SHOWN FOR REFERENCE
- W — WATER PIPE
- SS — SANITARY SEWER PIPE
- DEMOLITION OF EXISTING UTILITY

UNDERGROUND UTILITIES & STRUCTURES

THE EXISTENCE AND LOCATION OF UNDERGROUND UTILITY PLANS OR STRUCTURES SHOWN ON THESE PLANS WERE OBTAINED BY A SEARCH OF AVAILABLE RECORDS AND MAY NOT REFLECT ALL EXISTING UTILITIES. THE CONTRACTOR SHALL TAKE DUE PRECAUTIONS OF THE RECORDED UTILITIES AS WELL AS ANY NOT SHOWN AND SHALL CONFIRM ALL ALIGNMENTS AND GRADES BY FIELD INVESTIGATIONS. THE CONTRACTOR IS REQUIRED TO TAKE ALL PRECAUTIONARY MEASURES TO PROTECT THE UTILITIES SHOWN, AND IS RESPONSIBLE FOR THE PROTECTION OF, AND ANY DAMAGE TO THESE LINES OR STRUCTURES.

CAUTION: THE ENGINEER PREPARING THESE PLANS WILL NOT BE RESPONSIBLE FOR, OR LIABLE FOR, UNAUTHORIZED CHANGES OR USES OF THESE PLANS. ALL CHANGES TO THE PLANS MUST BE IN WRITING AND MUST BE APPROVED BY THE PREPARER OF THESE PLANS.

ENGINEER'S NOTICE TO CONTRACTOR

THE CONTRACTOR AGREES THAT HE SHALL ASSUME SOLE AND COMPLETE RESPONSIBILITY FOR JOB SITE CONDITIONS DURING THE COURSE OF CONSTRUCTION OF THIS PROJECT, INCLUDING SAFETY OF ALL PERSONS AND PROPERTY; THAT THIS REQUIREMENT SHALL APPLY CONTINUOUSLY AND NOT BE LIMITED TO NORMAL WORKING HOURS; AND THAT THE CONTRACTOR SHALL DEFEND, INDEMNIFY, AND HOLD THE OWNER AND THE ENGINEER HARMLESS FROM ANY AND ALL LIABILITY, REAL OR ALLEGED, IN CONNECTION WITH THE PERFORMANCE OF WORK ON THIS PROJECT, EXCEPTING FOR LIABILITY ARISING FROM THE SOLE NEGLIGENCE OF THE OWNER OR THE ENGINEER.

CONSTRUCTION NOTES

SANITARY SEWER

- SS1 CONTRACTOR TO LOCATE AND CONNECT TO EXISTING SEWER LATERAL. IF UNAVAILABLE OR INSUFFICIENT SIZE, INSTALL HOUSE CONNECTION PER CITY OF FULLERTON STD PLAN NO. 209A & 209B
- SS2 INSTALL 6" PVC, SDR-35 SANITARY SEWER PIPE, MIN. SLOPE = 2%. SIZE TO BE VERIFIED
- SS3 POINT OF CONNECTION 5' OUTSIDE BUILDING ENVELOPE. SEE PLUMBING DRAWINGS FOR CONTINUATION.
- SS4 POSSIBLE NEW SEWER LATERAL HOUSE CONNECTION. NEW HOUSE CONNECTION TO BE COORDINATED WITH THE CITY OF PLACENTIA AND INSTALLED PER CITY OF PLACENTIA STANDARDS AND REQUIREMENTS.

DOMESTIC WATER

- W1 CONTRACTOR TO ORDER AND COORDINATE NEW DOMESTIC WATER SERVICE CONNECTION FROM JHA
- W2 3" DOMESTIC WATER METER PER CITY OF FULLERTON STANDARD PLAN 603. CONTRACTOR TO COORDINATE WATER SERVICE CONNECTION WITH JHA. SIZE TO BE CONFIRMED.
- W3 INSTALL 3" SCHEDULE 40 PVC WATER PIPE. SIZE TO BE CONFIRMED.
- W4 INSTALL APPROVED 3" REDUCED PRESSURE BACKFLOW PREVENTOR. SEE PLUMBING PLANS FOR DETAILS. SIZE TO BE CONFIRMED.
- W5 POINT OF CONNECTION. SEE PLUMBING PLANS FOR CONTINUATION, DETAIL AND SPECIFICATION.
- W6 EXISTING WATER LATERAL TO BE CUT AND CAPPED PER LOCAL JHA REQUIREMENTS.
- W7 INSTALL 8" DOMESTIC WATER MAIN. SEE CITY OF FULLERTON STANDARD PLAN 600 & 701.

FIRE WATER

- F1 CONTRACTOR TO ORDER AND COORDINATE NEW FIRE WATER SERVICE CONNECTION FROM JHA.
- F2 INSTALL APPROVED 6" DOUBLE CHECK DETECTOR VALVE ASSEMBLY AND WATER METER PER CITY OF FULLERTON STD. DETAIL 603. SEE FIRE SPRINKLER PLANS FOR DETAILS. SIZE TO BE CONFIRMED.
- F3 INSTALL 6" C-900 PVC WATER PIPE. SIZE TO BE CONFIRMED.
- F4 POINT OF CONNECTION. SEE FIRE SPRINKLER PLANS FOR CONTINUATION, DETAIL AND SPECIFICATION.
- F5 INSTALL GATE VALVE, VALVE BOX ASSEMBLY AND STEM EXTENSION PER CITY OF FULLERTON STD. DETAIL 650 AND 651.
- F6 INSTALL FIRE HYDRANT PER CITY OF FULLERTON STD. DETAIL 610.
- F7 EXISTING FIRE HYDRANT SHOWN FOR REFERENCE.

IRRIGATION WATER

- IR1 2" IRRIGATION WATER METER PER CITY OF FULLERTON STD. DETAIL 602. . CONTRACTOR TO COORDINATE WATER SERVICE CONNECTION WITH JHA. SIZE TO BE CONFIRMED.
- IR2 INSTALL 2" SCHEDULE 40 PVC WATER PIPE. SIZE TO BE CONFIRMED.
- IR3 INSTALL APPROVED 2" REDUCED PRESSURE BACKFLOW PREVENTOR. SEE PLUMBING PLANS FOR DETAILS. SIZE TO BE CONFIRMED.
- IR4 POINT OF CONNECTION TO IRRIGATION SYSTEM. SEE IRRIGATION PLANS FOR CONTINUATION, DETAIL AND SPECIFICATION.

ELECTRICAL

- E1 PROPOSED TRANSFORMER AND SWITCHGEAR. SEE ELECTRICAL PLANS.

NOTES:

1. BACKFLOW PREVENTORS SHOWN HEREON, ARE FOR COORDINATION PURPOSES ONLY.
2. ALL STREET TRENCHES REQUIRED FOR THE INSTALLATION OF UTILITY CONNECTIONS SHALL COMPLY WITH CITY OF FULLERTON STANDARDS NO. 312 AND 313.
3. SERVICE LATERALS SHALL BE INSTALLED PER CITY OF FULLERTON STANDARD PLAN 701.
4. SEE SHEET C010 FOR KNOWN EXISTING UTILITIES WITHIN SITE. SHOWN EXISTING UTILITIES ARE BASED UPON AVAILABLE RECORDS.

Source: Pacific Consulting Group, 2025

Figure 10: Conceptual Utility Plan
Cedarwoods Fullerton Project

Not to scale.

Kimley»Horn

3.0 INITIAL STUDY CHECKLIST

1. **Project title:**
   Cedarwoods Fullerton Project
2. **Lead agency name and address:**
   City of Fullerton
   303 West Commonwealth Avenue
   Fullerton, California 92832
3. **Contact person and phone number:**
   David Lopez, Senior Planner
   Community and Economic Development Department
   (714) 738-6878
   david.lopez@cityoffullerton.com
4. **Project location:**
   The Project would be located at 2461-2495 East Orangethorpe Avenue, Fullerton, CA 92838. The approximately 4.79-acre project site includes one parcel described as APN 338-172-24.
5. **Project sponsor's name and address:**
   LTCGG LLC
   Attn: Annie Gallagher
   13925 City Center Drive, Suite 200
   Chino Hills, CA 91709
6. **General Plan designation:**
   Industrial (I)
7. **Zoning:**
   - Manufacturing Park with a 100,000 square-foot minimum lot size and an Emergency Shelter Overlay (MP-100-ES)
   - Commercial Manufacturing with an Emergency Shelter Overlay (CM-ES)
8. **Description of project:**
   See **Section 2.3: Project Characteristics**.
9. **Surrounding land uses and setting:**
   See **Section 2.1: Project Location and Setting**.
10. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement).**
    - Santa Ana Regional Water Quality Control Board
    - City of Placentia
11. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**
    Refer to **Section 4.18: Tribal Cultural Resources** for details.

NOTE: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

3.1 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages. All impacts can be mitigated to a less than significant level.

- ☐ Aesthetics
- ☐ Air Quality
- ☐ Agricultural and Forestry Resources
- ☐ Biological Resources
- ☒ Cultural Resources
- ☐ Energy
- ☒ Geology/Soils
- ☐ Greenhouse Gas Emissions
- ☐ Hazards & Hazardous Materials
- ☐ Hydrology/Water Quality
- ☐ Land Use/Planning
- ☐ Mineral Resources
- ☒ Noise
- ☐ Population/Housing
- ☐ Public Services
- ☐ Recreation
- ☐ Transportation
- ☒ Tribal Cultural Resources
- ☐ Utilities/Service Systems
- ☐ Wildfire
- ☐ Mandatory Findings of Significance

DETERMINATION:

On the basis of this initial evaluation (check one):

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

CERTIFICATION:

	11/5/2025
Signature	Date

4.0 ENVIRONMENTAL EVALUATION

4.1 AESTHETICS

ENVIRONMENTAL IMPACTS		Potentially Significant Issues	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
1.	**AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:**				
a)	Have a substantial adverse effect on a scenic vista?				X
b)	Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State scenic highway?				X
c)	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

a) Have a substantial adverse effect on a scenic vista?

No Impact. There are no scenic vistas that are visible from the project site. A scenic vista is defined as a viewpoint that provides expansive views of a highly valued landscape for the public's benefit. Scenic vistas within the City include views of the West and East Coyote Hills, which are located approximately 8.1 miles northwest and 3.1 miles north of the project site respectively.[4] Views of the Coyote Hills are obstructed by existing nearby development and are not visible from the project site. Therefore, Project implementation would not have an adverse effect on a scenic vista. No impacts would occur, and no mitigation is required.

b) Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State scenic highway?

No Impact. According to the California Department of Transportation (Caltrans) State Scenic Highway System Map, there are no officially designated scenic highways within the City or near the project site.[5] The closest eligible scenic highway near the project site is SR-57, approximately 10 miles to the north, and the closest officially designated scenic highway is SR-91 starting at the intersection of SR 55 and SR-91, approximately 6 miles to the east. The Project would not be visible

[4] City of Fullerton. (2012). The Fullerton Plan - *Final Program EIR, Section 5.3 Aesthetics and Light/Glare*. Retrieved from: https://www.cityoffullerton.com/home/showpublisheddocument/3700/637470826653170000. Accessed September 10, 2025.

[5] California Department of Transportation. (2019). California State Scenic Highway Map. Retrieved from https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed on September 10, 2025.

from any State scenic highway. The City has identified scenic corridors for special planning consideration, as well as Scenic Corridor Design Guidelines in order to provide a series of special controls for land improvements fronting these rights-of-way. The project site is not located on a City-designated scenic corridor. Therefore, the Project would not damage scenic resources and no impact would occur.

c) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less than Significant Impact. The project site is located within an urbanized area of Fullerton and is bordered by existing industrial, warehouse, and retail uses. The project site is located within the Southeast Industrial Focus Area, which is envisioned to be characterized by preserved industrial and employment-generating uses and to undergo moderate to significant change through infill, reuse, revitalization, and redevelopment by The Fullerton Plan. The Project proposes to remove the existing on-site structures and construct a new industrial building, consistent with the vision of The Fullerton Plan and the existing land use and zoning for the project site. The Project would be subject to the requirements of FMC Chapter 15.40, Industrial Zone Classifications, which addresses permitted and prohibited development intended to provide for industrial uses. The Project would also be subject to FMC Section 15.40.040, Site Development Standards, which addresses building exterior design, screening of rooftop equipment, landscape requirements, building height limits, setback requirements, and fences and walls, amongst others; refer to **Section 4.11: Land Use and Planning**.

As part of the City's Site Plan Review process required under FMC Chapter 15.47, Site Plan Review, the Project's site plan would be reviewed and only approved after finding the proposed development, including the uses and the physical design of the development is consistent with the intent and general purposes of the chapter, and would not adversely affect surrounding development in the area. Criteria used for review of a site plan includes: creating a development that is pleasant in character and is harmonious with the past development of Fullerton; minimizing the disruption of existing natural features such as trees and other vegetation and natural ground forms; illustrating a design compatibility with the desired developing character of the surrounding area; recognizing views, climate and the nature of outside activities in the design of exterior spaces; preserving public views and scenic vistas from unreasonable encroachment; screening exterior trash and storage areas and service yards from view of nearby streets and adjacent structures in a manner that is compatible with building site design; designing and/or screening all rooftop mechanical and electrical equipment as an integral part of the building design; designing landscaping to create a pleasing appearance from both within and off the site; and providing landscaping adjacent to and within parking areas in order to screen vehicles from view and minimize the expansive appearance of parking areas (FMC Section 15.47.060, Design Review Criteria).

Consistent with FMC Section 15.40.040, the Project would be set back over 20 feet from Orangethorpe Avenue, providing visual relief from public view. Additionally, the project would provide a total of 19,109 square feet of landscaping, including ground cover, shrubs, and trees focused near parking lot areas, the warehouse, site perimeter, and driveway entries (see **Figure 9: Conceptual Landscape Plan**) to create a visually pleasing exterior and screen views of the warehouse, specifically trash and storage areas, parking lots, and the truck court, from public view.

The warehouse would also have a maximum roof line of approximately 44 feet which be compatible with the existing scenic character of surrounding buildings and would screen all rooftop mechanical and electrical equipment. These project characteristics align with the desired development characteristics of the surrounding area and align with FMC Section 15.40.040. Therefore, the Project would not conflict with applicable zoning and other regulations governing scenic quality and no impact would occur.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. The project site is developed with a business park and is bordered by industrial, warehouse, and retail uses and therefore, currently experiences lighting typical of a developed and urbanized area (security and landscape lighting, automobile headlights, potential glare from glass surfaces, etc.).

Glare is created by the reflection of sunlight and electric lights from windows and building surfaces. Daytime glare is generally caused by the reflection of sunlight from highly reflective surfaces at or above eye level. Reflective surfaces are typically associated with buildings constructed with broad expanses of highly polished surfaces or broad, light-colored areas of paving. Daytime glare is usually present during early morning and late afternoon hours when the sun is at a low angle and the potential exists for intense reflected light to interfere with vision and driving conditions. Daytime glare may also hinder outdoor activities performed within surrounding land uses. Nighttime glare includes direct, intense, focused light, along with reflected light. Glare generated by direct light typically comes from mobile sources (e.g., automobiles). Glare is also less frequently caused by intense stationary sources, such as floodlights or cargo crane lights. As with daytime sun glare, intense nighttime light may cause undesirable interference with driving or other activities.

The Project would remove the existing on-site structures and construct a new warehouse building. No nighttime construction is proposed and construction activities would be subject to FMC Section 15.90.050, which restricts construction activities to between the hours of 7:00 AM and 8:00 PM Monday through Saturday. Therefore, the proposed project would not require construction lighting, except for security and safety lighting.

When the proposed Project is operational, it would generate light from two primary sources: interior building lighting and exterior lighting (e.g., signage, parking area lighting, security lighting, and landscape lighting), which would be similar to existing conditions and typical of warehouse uses. With respect to the warehouse structure, the exterior elevations would be white and grey with blue window glazing (**Figure 8: Conceptual Elevations**). The Project would be required to comply with the California Code of Regulations (CCR) Title 24 standards which would require all glass used in the building design to have minimal reflectivity to reduce glare to surrounding neighbors. Buildings with large facades constructed of reflective surfaces (e.g., brightly colored building facades, metal surfaces, and reflective glass) could increase existing levels of daytime glare. The Project's proposed design does not include such surfaces or components.

Access to the project site would continue to occur from the two existing driveways along East Orangethorpe Avenue and one driveway at the terminus of the Cypress Way cul-de-sac. Passenger vehicles would have access to the project site from all three driveways. Therefore, the Project would not introduce new conditions related to headlights from vehicles and trucks exiting the site.

All lighting installed would be subject to compliance with the provisions of the FMC, which includes standards for the provision of lighting in the various non-residential zones. Specifically, FMC Section 15.56.110, Illumination of Premises, requires lighting within parking areas to be arranged so as to reflect the light and glare away from adjacent properties. FMC Section 15.40.080.F requires all on-site lighting within industrial zones to limit glare/spillover onto adjacent properties with a residential zone classification; it is noted that residentially zoned properties are not located adjacent to the project site. Additionally, the proposed development would undergo site plan review to ensure compliance with the development standards of the M-P zoning district. Therefore, compliance with the FMC provisions specific to lighting would ensure proper design, installation, and operation of all exterior lighting, thereby reducing the potential for glare effects, light spillover onto adjacent properties, or conflicts with adjacent land uses. Therefore, compliance with the City's established regulatory framework, which would be verified through the City's plan review process, would ensure potential impacts associated with proposed Project lighting and glare would be reduced to a less than significant impact.

4.2 AGRICULTURE AND FORESTRY RESOURCES

ENVIRONMENTAL IMPACTS	Potentially Significant Issues	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
2. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The project site is located in an urbanized area along the southern border of Fullerton and adjacent to the cities of Anaheim and Placentia. The project site is bordered by industrial uses to the north, East Orangethorpe Avenue to the south, and industrial and commercial uses to the east and west. There are no agricultural or forestry resources located on or near the project site.

The project site is currently developed with a five-building multi-tenant business park. The State of California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) maps designate the project site as Urban and Built-Up Land[6]. Urban and Built-Up Land is defined as land developed at a density of at least one dwelling unit (du) per 1.5 acres, or approximately six structures to a 10-acre parcel.[7] Land uses include but are not limited to residential, industrial, office/commercial, institutional, and public administration. There is no Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance on the project site or in the vicinity of the project site.[8] Additionally, no farmland would be converted. Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and no impact would occur.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. A Williamson Act contract between local governments and private landowners restricts specified parcels of land to agricultural or related open space use in return for a lower property tax assessment. The project site is not under a Williamson Act contract.[8] According to Chapter 15.30 Commercial Zone Classifications of the FMC, the existing zoning district (C-M) for the project site does not allow for agricultural use without the approval of a conditional use permit (CUP).[9] A CUP has not been requested or required. Therefore, the proposed Project would not conflict with agricultural zoning designation or a Williamson contract, and no impact would occur.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? Or,

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The proposed Project would not conflict with existing zoning for forest land, timberland, or timberland production. The project site and surrounding areas are not zoned for forest land or timberland.[10] The existing zoning for the project site does not permit forest land, timberland, or timberland production. Therefore, the Project would not result in the loss of forest land or conversion of forest land to a non-forest use, and no impact would occur.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. The project site and surrounding area do not include, nor are located proximate to, agricultural uses or forest lands.[13] Therefore, the Project would not directly or indirectly result in the conversion of property from agricultural or timberland uses, and no impact would occur.

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6 California Department of Conservation. (ND). California Important Farmland Finder. Retrieved from: https://maps.conservation.ca.gov/dlrp/ciff/. Accessed July 9, 2025.

7 California Department of Conservation. (ND). Important Farmland Categories. Retrieved from: https://www.conservation.ca.gov/dlrp/fmmp/Pages/Important-Farmland-Categories.aspx. Accessed July 9, 2025.

8 California Department of Conservation. (ND). California Williamson Act Enrollment Finder Map. Retrieved from: https://maps.conservation.ca.gov/agriculture/. Accessed July 9, 2025.

9 City of Fullerton. (2024). Municipal Code. Retrieved from: https://codelibrary.amlegal.com/codes/fullerton/latest/fullerton_ca/0-0-0-30337. Accessed July 10, 2025.

10 City of Fullerton. (2023). City of Fullerton Zoning Map Atlas. Retrieved from: https://www.cityoffullerton.com/home/showpublisheddocument/1542/637449029859970000. Accessed July 9, 2025.

4.3 AIR QUALITY

ENVIRONMENTAL IMPACTS	Potentially Significant Issues	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
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?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?			X	

Air quality modeling outputs and results are included in **Appendix A: Air Quality and Greenhouse Gas Emissions Data** of this Initial Study.

Background

Climate and Topography

The California Air Resources Board (CARB) divides the State into 15 air basins that share similar meteorological and topographical features. The project site is located within the South Coast Air Basin (SCAB), which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino counties, as well as all of Orange County. The SCAB is on a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean on the southwest and high mountains forming the remainder of the perimeter[11]. The SCAB's air quality is determined by natural factors such as topography, meteorology, and climate, in addition to the presence of existing air pollution sources and ambient conditions.

The SCAB is part of a semi-permanent high-pressure zone in the eastern Pacific. As a result, the climate is mild and tempered by cool sea breezes. This usually mild weather pattern is occasionally interrupted by periods of extreme heat, winter storms, and Santa Ana winds. The annual average temperature throughout the 6,645-square-mile SCAB ranges from low 60 to high 80 degrees Fahrenheit with little variance. With more oceanic influence, coastal areas show less variability in annual minimum and maximum temperatures than inland areas. Contrasting the steady pattern of temperature, rainfall is seasonally and annually highly variable. Almost all annual rainfall occurs between the months of

[11] South Coast Air Quality Management District. (1993). *CEQA Air Quality Handbook.*

November and April. Summer rainfall is reduced to widely scattered thundershowers near the coast, with slightly heavier activity in the east and over the mountains.

Although the SCAB has a semiarid climate, the air closer to the Earth's surface is typically moist because of the presence of a shallow marine layer. Except for occasional periods when dry, continental air is brought into the SCAB by offshore winds, the "ocean effect" is dominant. Periods of heavy fog are frequent and low clouds known as high fog are characteristic climatic features, especially along the coast. Annual average humidity is 70 percent at the coast and 57 percent in the eastern portions of the SCAB.

Wind patterns across the SCAB are characterized by westerly or southwesterly on-shore winds during the day and easterly or northeasterly breezes at night. Wind speed is typically higher during the dry summer months than during the rainy winter. Between periods of wind, air stagnation may occur in both the morning and evening hours. Air stagnation is one of the critical determinants of air quality conditions on any given day. During winter and fall, surface high-pressure systems over the SCAB, combined with other meteorological conditions, result in very strong, downslope Santa Ana winds. These winds normally continue for a few days before predominant meteorological conditions are reestablished.

The mountain ranges to the east affect the diffusion of pollutants by inhibiting the eastward transport of pollutants. The SCAB's air quality generally ranges from fair to poor and is like air quality in most of coastal Southern California. The entire region experiences heavy concentrations of air pollutants during prolonged periods of stable atmospheric conditions.

In addition to the characteristic wind patterns that affect the rate and orientation of horizontal pollutant transport, two distinct types of temperature inversions control the vertical depth through which air pollutants are mixed. These inversions are the marine inversion and the radiation inversion. The height of the base of the inversion at any given time is called the "mixing height." The combination of winds and inversions is a critical determinant leading to highly degraded air quality for the SCAB in the summer and generally good air quality in the winter.

Air Pollutants of Concern

The air pollutants emitted into the ambient air by stationary and mobile sources are regulated by State and federal laws. These regulated air pollutants are known as "criteria air pollutants" and are categorized into primary and secondary pollutants.

Primary air pollutants are emitted directly from a source and include carbon monoxide (CO), reactive organic gases (ROG), nitrogen oxide (NO_X), sulfur dioxide (SO_2), coarse particulate matter (PM_{10}), fine particulate matter ($PM_{2.5}$), and lead. Of these primary pollutants, CO, NO_X, SO_2, PM_{10}, and $PM_{2.5}$ are criteria pollutants. ROG and NO_X are criteria pollutant precursors and form secondary criteria pollutants through chemical and photochemical reactions in the atmosphere. For example, the criteria pollutant ozone (O_3) is formed by a chemical reaction between ROG and NO_X in the presence of sunlight. The principal secondary pollutants are O_3 and nitrogen dioxide (NO_2). Sources and health effects commonly associated with criteria pollutants are summarized in **Table 4: Air Contaminants and Associated Public Health Concerns**.

Table 4: Air Contaminants and Associated Public Health Concerns		
Pollutant	**Major Man-Made Sources**	**Human Health Effects**
Particulate Matter (PM_{10} and $PM_{2.5}$)	Power plants, steel mills, chemical plants, unpaved roads and parking lots, wood-burning stoves and fireplaces, automobiles, and others.	Increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing; asthma; chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease. Impairs visibility.
Ozone (O_3)	Formed by a chemical reaction between reactive organic gases / volatile organic compounds (ROG or VOC)[1] and nitrogen oxides (NO_X) in the presence of sunlight. Motor vehicle exhaust, industrial emissions, gasoline storage and transport, solvents, paints, and landfills.	Irritates and causes inflammation of the mucous membranes and lung airways; causes wheezing, coughing, and pain when inhaling deeply; decreases lung capacity; aggravates lung and heart problems. Damages plants; reduces crop yield.
Sulfur Dioxide (SO_2)	A colorless gas formed when fuel containing sulfur is burned and when gasoline is extracted from oil. Examples are petroleum refineries, cement manufacturing, metal processing facilities, locomotives, and ships.	Respiratory irritant. Aggravates lung and heart problems. In the presence of moisture and oxygen, sulfur dioxide converts to sulfuric acid, which can damage marble, iron, and steel. Damages crops and natural vegetation. Impairs visibility. Precursor to acid rain.
Carbon Monoxide (CO)	An odorless, colorless gas formed when carbon in fuel is not burned completely; a component of motor vehicle exhaust.	Reduces the ability of blood to deliver oxygen to vital tissues, affecting the cardiovascular and nervous system. Impairs vision, causes dizziness, and can lead to unconsciousness or death.
Nitrogen Dioxide (NO_2)	A reddish-brown gas formed during fuel combustion for motor vehicles and industrial sources. Sources include motor vehicles, electric utilities, and other sources that burn fuel.	Respiratory irritant; aggravates lung and heart problems. Precursor to O_3. Contributes to global warming and nutrient overloading, which deteriorates water quality. Causes brown discoloration of the atmosphere.

[1] Volatile Organic Compounds (VOCs or Reactive Organic Gases [ROG]) are hydrocarbons/organic gases that are formed solely of hydrogen and carbon. There are several subsets of organic gases including ROGs and VOCs. Both ROGs and VOCs are emitted from the incomplete combustion of hydrocarbons or other carbon-based fuels. The major sources of hydrocarbons are combustion engine exhaust, oil refineries, and oil-fueled power plants; other common sources are petroleum fuels, solvents, dry cleaning solutions, and paint (via evaporation).

Source: California Air Pollution Resources Board. (N.D.). *Criteria Air Pollutants*. Retrieved from: https://www.epa.gov/criteria-air-pollutants. Accessed August 26, 2025.

Toxic Air Contaminants

Toxic air contaminants (TACs) are airborne substances that can cause short-term (acute) or long-term (i.e., chronic, carcinogenic, or cancer-causing) adverse human health effects (i.e., injury or illness). TACs include both organic and inorganic chemical substances. They may be emitted from a variety of common sources, including gasoline stations, automobiles, dry cleaners, industrial operations, and painting operations. The current California list of TACs includes more than 200 compounds, including particulate emissions from diesel-fueled engines.

CARB identified diesel particulate matter (DPM) as a toxic air contaminant. DPM differs from other TACs in that it is not a single substance but rather a complex mixture of hundreds of substances. Diesel exhaust

is a complex mixture of particles and gases produced when an engine burns diesel fuel. DPM is a concern because it causes lung cancer; many compounds found in diesel exhaust are carcinogenic. DPM includes the particle-phase constituents in diesel exhaust. The chemical composition and particle sizes of DPM vary between different engine types (heavy-duty, light-duty), engine operating conditions (idle, accelerate, decelerate), fuel formulations (high/low sulfur fuel), and the year of the engine. Some short-term (acute) effects of diesel exhaust include eye, nose, throat, and lung irritation, and diesel exhaust can cause coughs, headaches, light-headedness, and nausea. DPM poses the greatest health risk among the TACs. Almost all diesel exhaust particle mass is 10 microns or less in diameter. Due to their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung.

Ambient Air Quality

CARB monitors ambient air quality at approximately 250 air monitoring stations across the State. Air quality monitoring stations usually measure pollutant concentrations ten feet above ground level; therefore, air quality is often referred to in terms of ground-level concentrations. Existing levels of ambient air quality, historical trends, and projections near the project site are documented by measurements made by the South Coast Air Quality Management District (SCAQMD), the SCAB's air pollution regulatory agency that maintains air quality monitoring stations, which process ambient air quality measurements.

The pollutants of concern in the SCAB are O_3, NO_2, PM_{10}, and $PM_{2.5}$. The air monitoring station nearest the project site that monitors ambient concentrations for O_3, NO_2, PM_{10}, and $PM_{2.5}$ is the Anaheim – Loara School Station located approximately 3.6 miles to the southeast. Local air quality data from 2022 to 2024 (the latest currently available) are provided in **Table 5: Ambient Air Quality Data**, which lists the annual monitored maximum concentrations and number of exceedances of the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS).

Sensitive Receptors

Sensitive populations are more susceptible to the effects of air pollution than the general population. Sensitive receptors that are in proximity to localized sources of toxics are of particular concern. Land uses considered sensitive receptors include residences, schools, playgrounds, childcare centers, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. The nearest sensitive receptors to the project site are residential uses located approximately 765 feet to the southeast and Interface Rehab located approximately 975 feet to the east.[12]

[12] The nearest sensitive receptors are located in the City of Placentia. The distance was measured from the project site property line to the nearest sensitive receptor property line on Google Earth Imagery (2025).

Table 5: Ambient Air Quality Data			
Criteria Pollutant	**2022[1]**	**2023[1]**	**2024[1]**
Ozone (O_3)			
1-hour Maximum Concentration (ppm)	0.102	0.089	0.104
8-hour Maximum Concentration (ppm)	0.076	0.076	0.079
Number of Days Standard Exceeded			
CAAQS 1-hour (>0.09 ppm)	1	0	3
NAAQS 8-hour (>0.070 ppm)	1	2	3
Carbon Monoxide (CO)			
1-hour Maximum Concentration (ppm)	1.188	2.513	2.770
Number of Days Standard Exceeded			
NAAQS 1-hour (>35 ppm)	0	0	0
CAAQS 1-hour (>20 ppm)	0	0	0
Nitrogen Dioxide (NO_2)			
1-hour Maximum Concentration (ppm)	0.053	0.051	0.053
Number of Days Standard Exceeded			
NAAQS 1-hour (>100 ppm)	0	0	0
CAAQS 1-hour (>0.18 ppm)	0	0	0
Particulate Matter Less Than 10 Microns (PM_{10})			
National 24-hour Maximum Concentration	67.0	97.8	118.9
State 24-hour Maximum Concentration	66.7	99.4	42.7
State Annual Average Concentration (CAAQS=20 µg/m^3)	-	-	-
Number of Days Standard Exceeded			
NAAQS 24-hour (>150 µg/m^3)	-	-	0
CAAQS 24-hour (>50 µg/m^3)	-	-	-
Particulate Matter Less Than 2.5 Microns ($PM_{2.5}$)			
National 24-hour Maximum Concentration	33.1	45.6	49.7
State 24-hour Maximum Concentration	33.1	50.7	49.7
Number of Days Standard Exceeded			
NAAQS 24-hour (>35 µg/m^3)	0	1.0	5.1

[1] Measurements for O_3, CO, NO_2, PM_{10}, and $PM_{2.5}$ taken at the Anaheim – Loara School located at 1630 Pampas Lane, Anaheim, CA 92802 (CARB #30178).
NAAQS = National Ambient Air Quality Standards; CAAQS = California Ambient Air Quality Standards; ppm = parts per million; µg/m^3 = micrograms per cubic meter; – = not measured
Source: All pollutant measurements are from the CARB Aerometric Data Analysis and Management system database (https://www.arb.ca.gov/adam) except for CO, which were retrieved from the CARB Air Quality and Meteorological Information System (https://www.arb.ca.gov/aqmis2/aqdselect.php).

Regulations

Federal Clean Air Act

Air quality is federally protected by the Federal Clean Air Act (FCAA) and its amendments. Under the FCAA, the U.S. Environmental Protection Agency (U.S. EPA) developed the primary and secondary NAAQS for the criteria air pollutants including O_3, NO_2, CO, SO_2, PM_{10}, $PM_{2.5}$, and lead. Depending on whether the standards are met or exceeded, the local air basin is classified as in "attainment" or "nonattainment."

Some areas are unclassified, which means no monitoring data are available. Unclassified areas are considered to be in attainment. Proposed projects in or near nonattainment areas could be subject to more stringent air-permitting requirements. The FCAA requires that each state prepare a State Implementation Plan (SIP) to demonstrate how it will attain the NAAQS within federally imposed deadlines. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date. The U.S. EPA has designated enforcement of air pollution control regulations to the individual states. Applicable federal and State standards are summarized in **Table 6: State and Federal Ambient Air Quality Standards.**

Table 6: State and Federal Ambient Air Quality Standards

Pollutant	Averaging Time	State Standards[1,2]	Federal Standards[3,4,5]
Ozone (O_3)[6]	1 Hour	0.09 ppm (180 µg/m^3)	NA
	8 Hour	0.070 ppm (137 µg/m^3)	0.070 ppm (137 µg/m^3)
Respirable Particulate Matter (PM_{10})[7]	24-Hour	50 µg/m^3	150 µg/m^3
	Annual Arithmetic Mean	20 µg/m^3	NA
Fine Particulate Matter ($PM_{2.5}$)[7]	24-Hour	NA	35 µg/m^3
	Annual Arithmetic Mean	12 µg/m^3	9.0 µg/m^3
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)
	8 Hour	9.0 ppm (10 mg/m^3)	9.0 ppm (10 mg/m^3)
Nitrogen Dioxide (NO_2)[8]	1 Hour	0.18 ppm (339 µg/m^3)	100 ppb (188 µg/m^3)
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	0.053 ppm (100 µg/m^3)
Sulfur Dioxide (SO_2)[9]	1 Hour	0.25 ppm (655 µg/m^3)	75 ppb (196 µg/m^3)
	24 Hour	0.04 ppm (105 µg/m^3)	0.14 ppm (365 µg/m^3)
	Annual Arithmetic Mean	NA	0.03 ppm (80 µg/m^3)
Lead (Pb)[10,11]	30-Day Average	1.5 µg/m^3	NA
	Calendar Quarter	NA	1.5 µg/m^3
	Rolling 3-Month Average	NA	0.15 µg/m^3
Visibility Reducing Particles[12]	8 hours	See Note 11	NA
Sulfates (SO_4^{-2})	24 Hour	25 µg/m^3	NA
Hydrogen Sulfide (H_2S)	1 Hour	0.03 ppm (42 µg/m^3)	NA
Vinyl Chloride (C_2H_3Cl)[10]	24 Hour	0.01 ppm (26 µg/m^3)	NA

[1] California standards for O_3, carbon monoxide (except Lake Tahoe), sulfur dioxide (1-hour and 24-hour), nitrogen dioxide, suspended particulate matter (PM_{10}, $PM_{2.5}$, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

[2] Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

[3] National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m^3 is equal to or less than one. For $PM_{2.5}$, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.

[4] National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

[5] On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

[6] On February 7, 2024, the national annual $PM_{2.5}$ primary standard was lowered from 12.0 µg/m^3 to 9.0 µg/m^3. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 µg/m3, as was the annual secondary standard of 15.0 µg/m^3. The existing 24-hour PM_{10} standards (primary and secondary) of 150 µg/m^3 also were retained. The form of the annual primary and secondary standards is

Table 6: State and Federal Ambient Air Quality Standards

the annual mean, averaged over 3 years.

[7] To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

[8] On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved. Note that the 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

[9] The ARB has identified lead and vinyl chloride as "toxic air contaminants" with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

[10] The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 $\mu g/m^3$ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

[11] In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

ppm = parts per million; ppb = parts per billion; $\mu g/m^3$ = micrograms per cubic meter; mg/m^3 = milligrams per cubic meter; NA = no information available

Source: South Coast Air Quality Management District. (2024). Table of *Air Quality Standards*. Retrieved from: https://ww2.arb.ca.gov/sites/default/files/2024-08/AAQS%20Table_ADA_FINAL_07222024.pdf. Accessed August 27, 2025.

Federal Emissions Standards for On-Road Trucks

To reduce emissions from on-road, heavy-duty diesel trucks, the U.S. EPA established a series of increasingly strict emission standards for new engines, starting in 1988. The U.S. EPA promulgated the final and cleanest standards with the 2007 Heavy-Duty Highway Rule. The particulate matter emission standard of 0.01 gram per horsepower-hour (g/hp-hr) is required for new vehicles beginning with Model Year 2007. Also, the NO_X and nonmethane hydrocarbon standards of 0.20 g/hp-hr and 0.14 g/hp-hr, respectively, were phased in together between 2007 and 2010 on a percent of sales basis: 50 percent from 2007 to 2009 and 100 percent in 2010.

Emission Standards for Off-Road Diesel Engines

To reduce emissions from off-road diesel equipment, the U.S. EPA established a series of cleaner emission standards for new off-road diesel engines. Tier 1 standards were phased in from 1996 to 2000 (year of manufacture), depending on the engine horsepower category. Tier 2 standards were phased in from 2001 to 2006. Tier 3 standards were phased in from 2006 to 2008. Tier 4 standards, which generally require add-on emission control equipment to attain them, were phased in from 2008 to 2015.

California Air Resources Board

CARB administers California's air quality policy. The CAAQS were established in 1969 pursuant to the Mulford-Carrell Act. These standards are generally more stringent and apply to more pollutants than the NAAQS. In addition to the criteria pollutants, CAAQS have been established for visibility reducing particulates, hydrogen sulfide, and sulfates.

The California Clean Air Act (CCAA), which was approved in 1988, requires that each local air district prepare and maintain an Air Quality Management Plan (AQMP) to achieve compliance with CAAQS. These AQMPs also serve as the basis for the preparation of the SIP for meeting the NAAQS. Like the U.S. EPA, CARB also designates areas within California as either attainment or nonattainment for each criteria

pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a CAAQS was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events such as wildfires, volcanoes, etc. are not considered violations of the CAAQS, and are not used as a basis for designating areas as nonattainment. The applicable CAAQS are summarized in **Table 6**.

South Coast Air Quality Management District

The SCAQMD is the air pollution control agency for Orange County and the urban portions of Los Angeles, Riverside, and San Bernardino counties. The SCAQMD's primary responsibility is ensuring that NAAQS and CAAQS are attained and maintained in the SCAB. The SCAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, conducting public education campaigns, and many other activities. All projects are subject to SCAQMD rules and regulations in effect at the time of construction.

The SCAQMD is also the lead agency in charge of developing the AQMP, with input from the Southern California Association of Governments (SCAG) and CARB. The AQMP is a comprehensive plan that includes control strategies for stationary and area sources, as well as for on-road and off-road mobile sources. SCAG has the primary responsibility for providing future growth projections and the development and implementation of transportation control measures. CARB, in coordination with federal agencies, provides the control element for mobile sources.

The 2016 AQMP was adopted by the SCAQMD Governing Board on March 3, 2017. The purpose of the AQMP is to set forth a comprehensive and integrated program that would lead the SCAB into compliance with the federal 24-hour $PM_{2.5}$ air quality standard, and to update the SCAQMD's commitments towards meeting the federal 8-hour O_3 standards. The AQMP incorporates scientific and technological information and planning assumptions, including the 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and updated emission inventory methodologies for various source categories.

On October 1, 2015, the U.S. EPA strengthened the NAAQS for ground-level O_3. The 2022 AQMP, adopted by the SCAQMD Governing Board on December 2, 2022, was developed to address the requirements for meeting the 2015 8-hour O_3 standard. The 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emission [ZE] technologies, when cost-effective and feasible, and low NO_X technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other FCAA measures to achieve the 2015 8-hour O_3 standard. The 2022 AQMP incorporates the latest scientific and technological information and planning assumptions, including the 2020 RTP/SCS and updated emission inventory methodologies for various source categories.

The SCAQMD published the *CEQA Air Quality Handbook* (approved by the SCAQMD Governing Board in 1993 and augmented with guidance for Local Significance Thresholds [LST] in 2008).[13] The SCAQMD guidance helps local government agencies and consultants develop environmental documents required

[13] South Coast Air Quality Management District. (2008). *Final Localized Significance Threshold Methodology*. Retrieved from: https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds. Accessed August 27, 2025.

by CEQA and identifies thresholds of significance for criteria pollutants for both construction and operation (see discussion of thresholds below). With the help of the *CEQA Air Quality Handbook* and associated guidance, local land use planners and consultants can analyze and document how existing and proposed projects affect air quality, in order to meet the CEQA review process requirements. The SCAQMD periodically provides supplemental guidance and updates to the handbook on their website.

The State and federal attainment status designations for the SCAB are summarized in **Table 7: South Coast Air Basin Attainment Status**. The SCAB is currently designated as a nonattainment area with respect to the State O_3, PM_{10}, and $PM_{2.5}$ standards, as well as the national O_3 and $PM_{2.5}$ standards. The SCAB is designated as attainment or unclassified for the remaining NAAQS and CAAQS.

Table 7: South Coast Air Basin Attainment Status

Pollutant	State	Federal
Ozone (O_3) (1 Hour Standard)	Nonattainment	Nonattainment (Extreme)
Ozone (O_3) (8 Hour Standard)	Nonattainment	Nonattainment (Extreme)
Particulate Matter ($PM_{2.5}$) (24 Hour Standard)	–	Nonattainment (Serious)
Particulate Matter ($PM_{2.5}$) (Annual Standard)	Nonattainment	Nonattainment (Serious)
Particulate Matter (PM_{10}) (24 Hour Standard)	Nonattainment	Attainment (Maintenance)
Particulate Matter (PM_{10}) (Annual Standard)	Nonattainment	–
Carbon Monoxide (CO) (1 Hour Standard)	Attainment	Attainment (Maintenance)
Carbon Monoxide (CO) (8 Hour Standard)	Attainment	Attainment (Maintenance)
Nitrogen Dioxide (NO_2) (1 Hour Standard)	Attainment	Unclassifiable/Attainment
Nitrogen Dioxide (NO_2) (Annual Standard)	Attainment	Attainment (Maintenance)
Sulfur Dioxide (SO_2) (1 Hour Standard)	Attainment	Unclassifiable/Attainment
Sulfur Dioxide (SO_2) (24 Hour Standard)	Attainment	–
Lead (Pb) (30 Day Standard)	–	Unclassifiable/Attainment
Lead (Pb) (3 Month Standard)	Attainment	–
Sulfates (SO_{4-2}) (24 Hour Standard)	Attainment	–
Hydrogen Sulfide (H_2S) (1 Hour Standard)	Unclassified	–

Source: South Coast Air Quality Management District. (2022). *2022 Air Quality Management Plan.*; United States Environmental Protection Agency. (2022). *Nonattainment Areas for Criteria Pollutants (Green Book).*

The following is a list of SCAQMD rules that are required of construction activities associated with the proposed Project:

- **Rule 401 (Visible Emissions)** – A person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any 1 hour that is dark or darker in shade as that designated No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines.
- **Rule 402 (Nuisance)** – This rule prohibits the 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. This rule does not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.
- **Rule 403 (Fugitive Dust)** – This rule requires fugitive dust sources to implement best available control measures for all sources, and all forms of visible particulate matter are prohibited from crossing any property line. This rule is intended to reduce PM10 emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. PM10 suppression Best Available Control Measures are summarized below.
    a) Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.
    b) All on-site roads will be paved as soon as feasible or watered periodically or chemically stabilized.
    c) All material transported off-site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.
    d) The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.
    e) Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down at the end of the work day to remove soil tracked onto the paved surface.
- **Rule 431.2 (Sulfur Content of Liquid Fuels)** - This rule limits the sulfur content in diesel and other liquid fuels for the purpose of both reducing the formation of sulfur oxides and particulates during combustion and to enable the use of add-on control devices for diesel fueled internal combustion engines.
- **Rule 1113 (Architectural Coatings)** – This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce ROG emissions from the use of these coatings, primarily by placing limits on the ROG content of various coating categories.
- **Rule 1143 (Paint Thinners and Solvents)** – This rule governs the manufacture, sale, and use of paint thinners and solvents used in thinning of coating materials, cleaning of coating application equipment, and other solvent cleaning operations by limiting their volatile organic compound

(VOC) content. This rule regulates the VOC content of solvents used during construction. Solvents used during the construction phase must comply with this rule.

- **Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities)** – This rule requires owners and operators or any demolition or renovation activity and the associated disturbance of asbestos-containing materials, any asbestos storage facility, or any active waste disposal site to implement work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials.
- **Rule 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines)** – This rule would minimize emissions associated with stationary engines over 50 horsepower by establishing operating requirements and emission standards, enforcing the Airborne Toxics Control Measure, and requiring owners and operators to submit a Compliance Status Report and a Compliance Plan to the SCAQMD.
- **Rule 2305 (Warehouse Indirect Source Rule)** - Rule 2305 was adopted by the SCAQMD Governing Board on May 7, 2021 to reduce NOX and particulate matter emissions associated with warehouses and mobile sources attracted to warehouses. This rule applies to all existing and proposed warehouses over 100,000 square feet located in the SCAQMD. Rule 2305 requires warehouse operators to track annual vehicle miles traveled (VMT) associated with truck trips to and from the warehouse. These trip miles are used to calculate the Project's Warehouse Actions and Investments to Reduce Emissions (WAIRE) Points Compliance Obligation. WAIRE Points are earned based on emission reduction measures and warehouse operators are required to submit an annual WAIRE Report which includes truck trip data and emission reduction measures. Reduction strategies listed in the WAIRE menu include acquire ZE or near zero emission (NZE) trucks; require ZE/NZE truck visits; require ZE yard trucks; install on-site ZE charging/fueling infrastructure; install on-site energy systems; and install filtration systems in residences, schools, and other buildings in the adjacent community. Warehouse operators that do not earn a sufficient number of WAIRE points to satisfy the WAIRE Points Compliance Obligation would be required to pay a mitigation fee. Funds from the mitigation fee will be used to incentivize the purchase of cleaner trucks and charging/fueling infrastructure in communities nearby.

The Fullerton Plan

Adopted on May 1, 2012, Chapter 17: Air Quality and Climate Change of the City of Fullerton General Plan Natural Environment Element establishes goals and policies to improve local air quality and protect the community from potentially adverse air quality impacts. The following General Plan goals and policies have been adopted by the City for the purpose of mitigating air emissions resulting from its land use decisions and are applicable to the proposed Project.

GOAL 21 **Protection and improvement of air quality.**

P21.1 **Jobs-Housing Balance** Support regional and subregional efforts to improve the alignment of housing options and employment opportunities to reduce commuting.

P21.2 **Transportation System** Support regional and subregional efforts to promote a transportation system coordinated with air quality improvements.

P21.4 **Balanced Land Use** Support projects, programs, policies and regulations to promote a balance of residential, commercial, industrial, recreational and institutional uses located to provide options to reduce vehicle trips and vehicle miles traveled.

P21.5 **Product Handling and Disposal Impacts** Support projects, programs, policies and regulations to reduce impacts to air quality from the improper handling and disposal of commercial products.

P21.6 **Construction Impacts** Support projects, programs, policies and regulations to reduce impacts to air quality caused by private and public construction projects.

P21.7 **Development Impacts** Support projects, programs, policies and regulations to reduce impacts to air quality caused by the design or operation of a site or use.

Thresholds of Significance

The significance criteria established by SCAQMD may be relied upon to make the determinations listed above. According to the SCAQMD, an air quality impact is considered significant if a project would violate any NAAQS or CAAQS, contribute substantially to an existing or projected air quality violation, or expose sensitive receptors to substantial pollutant concentrations.

Regional Emissions Threshold

The SCAQMD has established numeric thresholds of significance for air pollutants resulting from construction and operational activities of land use development projects within the SCAQMD jurisdictional boundaries, as shown in **Table 8: South Coast Air Quality Management District Significance Thresholds**. If the SCAQMD thresholds are exceeded, a potentially significant impact may occur, and additional analysis is warranted to fully assess the significance of impacts. However, ultimately the City, as the Lead Agency under CEQA, determines the thresholds of significance for impacts.

Table 8: South Coast Air Quality Management District Significance Thresholds

Pollutant	Mass Daily Thresholds (pounds per day)	
	Construction	Operations
Volatile Organic Compounds (VOC)	75	55
Nitrogen Oxides (NO_X)	100	55
Carbon Monoxide (CO)	550	550
Sulfur Oxides (SO_X)	150	150
Particulate Matter up to 10 Microns (PM_{10})	150	150
Particulate Matter up to 2.5 Microns ($PM_{2.5}$)	55	55

Source: South Coast Air Quality Management District. (2023). *South Coast AQMD Air Quality Significance Thresholds.*

Localized Carbon Monoxide

The Project would be subject to the CAAQS and NAAQS for CO. These are addressed though an analysis of localized CO impacts known as the CO "hot spots" analysis, which determines whether the change in the level of service of an intersection as a result of the Project would have the potential to result in exceedances of the CAAQS or NAAQS. The 2003 AQMP is the most recent AQMP that addressed CO concentrations. As part of the 2003 AQMP CO Modeling Attainment Demonstration, an analysis was

performed utilizing dispersion modeling.[14] As an initial screening step, if a project roadway segment does not exceed an average daily traffic (ADT) of 100,000 per day, then the project does not need to prepare a detailed CO hot spot analysis.

Localized Significance Threshold

The SCAQMD developed the LSTs for emissions of NO_2, CO, PM_{10}, $PM_{2.5}$ in response to the SCAQMD *Governing Boards' Environmental Justice Enhancement Initiative (I-4)*. The SCAQMD provided the *Final Localized Significance Threshold Methodology* (dated June 2003 [revised 2008]) to assist lead agencies in analyzing localized impacts associated with project-specific emissions. LSTs represent the maximum emissions that can be generated at the project site that are not expected to cause or substantially contribute to an exceedance of the most stringent CAAQS or NAAQS. LSTs are based on the ambient concentrations of that pollutant within the project source receptor area (SRA), as demarcated by the SCAQMD, the distance to the nearest sensitive receptor, and the project site acreage.

The SCAQMD's *Localized Significance Threshold Methodology* provides on-site mass emissions rate look-up tables. The project site is located within SCAQMD SRA 16 (North Orange County). LST thresholds are provided for source-receptor distances of 25, 50, 100, 200, and 500 meters. The sensitive receptors nearest the project site are residential uses located approximately 765 feet (233 meters) to the southeast. **Table 9: Local Significance Thresholds for Construction and Operations** summarizes the LSTs for 1-acre, 2-acre, and 5-acre projects in SCAQMD SRA 16 with sensitive receptors located 200 meters from the project site.

Table 9: Local Significance Thresholds for Construction and Operations

Daily Acres Disturbed/ Project Size	Maximum Emissions (pounds per day)							
	Construction				Operations			
	NO_X	CO	PM_{10}	$PM_{2.5}$	NO_X	CO	PM_{10}	$PM_{2.5}$
1 Acre	159	1,975	53	20	159	1,975	13	5
2 Acres	186	2,444	60	24	186	2,444	15	6
5 Acres	249	3,605	78	34	249	3,605	19	8

NO_X = nitrogen oxides; CO = carbon monoxide; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter
Source: South Coast Air Quality Management District. (2008). *Localized Significance Threshold Methodology*.

LSTs associated with all acreage categories are provided in **Table 9** for informational purposes and to demonstrate the LSTs increase as acreages increase. It should be noted that LSTs are screening thresholds and are therefore conservative. The construction LST acreage is determined based on the daily acreage disturbed by the Project. LST analysis for construction is required for all projects that disturb 5 acres or less on a single day. The operational LST acreage is based on the total area of the project site.

Methodology

This air quality impact analysis considers construction and operational impacts associated with the Project. Where criteria air pollutant quantification was required, emissions were modeled using the CARB-approved California Emissions Estimator Model (CalEEMod). CalEEMod is a Statewide land use emissions computer model designed to quantify potential criteria pollutant emissions associated with both

[14] South Coast Air Quality Management District. (2003). *Air Quality Management Plan, Appendix V, Modeling and Attainment Demonstrations*. Retrieved from: https://www.aqmd.gov/home/air-quality/air-quality-management-plans/air-quality-mgt-plan/2003-aqmp. Accessed August 27, 2025.

construction and operations from a variety of land use projects. Air quality impacts were assessed according to methodologies recommended by CARB and the SCAQMD.

Project construction would generate emissions from construction equipment, trucks, worker vehicles, and ground-disturbing activities. Daily regional construction emissions are estimated by assuming construction occurs at the earliest feasible date (i.e. a conservative estimate of construction activities) and applying off-road, fugitive dust, and on-road emissions factors in CalEEMod.

Project operations would generate emissions from area sources (consumer products, architectural coating, and landscaping equipment), energy sources (electricity usage), mobile sources (motor vehicles from Project-generated vehicle trips), an emergency fire pump, and off-road forklift usage. Project-generated increases in operational emissions would be predominantly associated with motor vehicle use. The mobile source emissions were estimated in CalEEMod based on the Project vehicle trip generation outlined in Table 1 from **Appendix L**. The trip generation table includes a comparison of the trips associated with the existing and proposed uses and is informed by the Institute of Transportation Engineers (ITE) Land Use Codes in the City's Transportation Assessment Policies & Procedures (TAPP) Analysis Level of Service (LOS) section. The area and energy source emissions were quantified in CalEEMod based on land use activity data. The emergency fire pump emissions were calculated using default emissions rates from the U.S. EPA. The off-road forklift emissions were calculated using default emissions rates from CARB.

The proposed Project's regional construction and operational emissions were compared to the SCAQMD's significance thresholds to determine the significance of the Project's impact on regional air quality; refer to **Table 5**. The proposed Project's localized construction and operational emissions were evaluated in accordance with the SCAQMD's LST methodology, which uses on-site mass emissions rate look-up tables and Project-specific modeling. LSTs represent the maximum on-site emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable NAAQS and CAAQS.

Impact Analysis

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

Less Than Significant Impact. The U.S. EPA requires each state with nonattainment areas to prepare and submit a SIP that demonstrates the means to attain the NAAQS. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under State law, the CCAA requires an air quality attainment plan to be prepared for areas designated as nonattainment regarding the NAAQS and CAAQS. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

The project site is located within the SCAB, which is under SCAQMD's jurisdiction. The SCAQMD is required, pursuant to the FCAA, to reduce emissions of criteria pollutants for which the SCAB is in nonattainment. To reduce such emissions, the SCAQMD drafted the 2016 AQMP and 2022 AQMP (AQMPs).[15] The AQMPs establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving NAAQS and CAAQS. The AQMPs are a regional and multi-agency

[15] The 2016 AQMP (adopted in March 2017) was developed to address attainment of multiple O_3 and $PM_{2.5}$ standards. The 2022 AQMP (adopted in December 2022), was developed to address attainment of the 2015 8-hour O_3 standard.

effort including the SCAQMD, the CARB, the SCAG, and the U. S. EPA. The AQMPs pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including SCAG's Connect SoCal, updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans. The Project is subject to the SCAQMD's AQMPs.

Criteria for determining consistency with the AQMPs are defined by the following indicators:

- **Consistency Criterion No. 1**: The Project would not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of the AQMP's air quality standards or the interim emissions reductions.
- **Consistency Criterion No. 2**: The Project would not exceed the AQMP's assumptions or increments based on the years of the Project build-out phase.

According to the SCAQMD's *CEQA Air Quality Handbook*, the purpose of the consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans, and thus if it would interfere with the region's ability to comply with CAAQS and NAAQS.[16]

The violations to which Consistency Criterion No. 1 refers are CAAQS and NAAQS. As addressed below in **Table 10: Project Construction Emissions** and **Table 11: Project Operational Emissions**, the Project would not exceed the short-term construction or long-term operational thresholds of significance and would therefore not violate any air quality standards. As such, the Project would not result in an increase in frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMPs. Therefore, the Project would be consistent with the first criterion.

Concerning Consistency Criterion No. 2, the 2022 AQMP contains air pollutant reduction strategies based on SCAG's latest growth forecasts included in the 2020 RTP/SCS. SCAG's growth forecasts are made in consultation with local governments and with reference to their local general plans.

The Project is anticipated to employ approximately 113 employees[17] and could indirectly induce population growth if future employees move into the City to work at the proposed warehouse. The Project would provide employment opportunities within a City with substantial housing stock. As such, it is likely that the Project would employ current residents of the City. In the event that the operator of the proposed facility draws employees that are not from the local community, the Project would not directly result in the development of new housing.

The population and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the City. As the Project would not directly result in the development of new housing and the project site land use designation (Industrial) is consistent with the General Plan, the Project would not cause the General Plan buildout household or employment forecasts to be exceeded. Additionally, as the SCAQMD has incorporated these

[16] South Coast Air Quality Management District. (1993). *CEQA Air Quality Handbook*.

[17] Based on employee generation factor of one employee per 979 sf of warehouse use provided, the Project is anticipated to employ approximately 113 employees. Source: Natelson Company, Inc. (2001). Employment Density Study Summary Report, Table 6A.

same projections into the AQMPs, it can be concluded that the proposed Project would be consistent with second criterion.

Based on the foregoing, the Project would not conflict with or obstruct the implementation of the AQMPs or any applicable air quality plan and impacts to this regard would be less than significant.

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?

Less Than Significant Impact: Regional Construction Emissions. Project construction activities would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern within the area include O_3-precursor pollutants (i.e., ROG and NO_X), PM_{10}, and $PM_{2.5}$. Construction-generated emissions are short-term and of temporary duration, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the SCAQMD's thresholds of significance.

Project construction would result in the temporary generation of criteria pollutant emissions from all phases of construction, including demolition, site preparation, grading, infrastructure improvements, building construction, paving, and architectural coating applications.[18]

Construction results in the temporary generation of emissions resulting from site grading, road paving, motor vehicle exhaust associated with construction equipment and worker trips, and the movement of construction equipment, especially on unpaved surfaces. Emissions of airborne particulate matter are largely dependent on the amount of ground disturbance associated with site preparation activities, as well as weather conditions and the appropriate application of water.

Project construction activities would occur over approximately 13 months, anticipated to begin as early as the third quarter of 2027 and ending as early as the third quarter of 2028. Construction-generated emissions associated with the Project were calculated using CalEEMod, which is designed to model emissions for land use development projects, based on typical construction requirements. Fugitive dust emissions from construction may temporarily become a nuisance and potential health hazard to those living and working nearby. Project construction would comply with SCAQMD rules and regulations, including SCAQMD Rule 402 (Nuisance), Rule 403 (Fugitive Dust), and Rule 1113 (Architectural Coatings). SCAQMD Rule 402 (Nuisance) prohibits the discharge of air contaminants or other material that cause a nuisance. SCAQMD Rule 403 (Fugitive Dust) requires fugitive dust control measures. SCAQMD Rule 1113 (Architectural Coatings) provides specifications on painting practices and regulates the ROG content of paint. Project construction would additionally comply with CARB's anti-idling regulations, which prohibits heavy-duty diesel vehicle idling for more than five minutes. Rule 403 was applied in CalEEMod to reduce fugitive dust emissions. See **Appendix A** for more information regarding the construction assumptions.

[18] Although not proposed, this analysis conservatively assumes the Project would include full-width grind and overlay along Cypress Way.

Short-term construction emissions attributable to the Project are summarized in are summarized in **Table 10: Project Construction Emissions**.

Table 10: Project Construction Emissions

Construction Year	Maximum Daily Emissions (pounds per day)[1, 2]					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
2027	3.10	28.03	29.02	0.07	7.36	3.76
2028	58.75	16.24	25.92	0.04	1.50	0.74
Maximum Emissions	58.75	28.03	29.02	0.07	7.36	3.76
SCAQMD Threshold	75	100	550	150	55	150
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

[1] As recommended by the SCAQMD, emissions were calculated using CalEEMod version 2022.1 and the worst-case seasonal maximum daily emissions are reported.
[2] SCAQMD Rule 403 Fugitive Dust was applied. SCAQMD Rule 403 reduction/credits include: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stockpiles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied.
ROG = reactive organic gases; NO_X = nitrogen oxides; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District
Source: CalEEMod version 2022.1. Refer to **Appendix A** for the model outputs.

Table 10 shows the Project construction-related emissions would not exceed the applicable SCAQMD thresholds without assuming compliance with SCAQMD Rules 402 (Nuisance) and 1113 (Architectural Coatings) and CARB's anti-idling regulations. Therefore, the actual Project construction emissions would be even lower than reported in **Table 10**. As such, impacts associated with Project regional construction emissions would be less than significant.

Less Than Significant Impact: Regional Operational Emissions. The Project's operational emissions would be associated with area sources (consumer products, architectural coating, and landscaping equipment), energy sources, mobile sources (motor vehicles from Project-generated vehicle trips), an emergency fire pump, and off-road forklifts. Primary sources of operational criteria pollutants are from motor vehicle use and area sources.

Long-term operational emissions attributable to the Project are summarized in **Table 11: Project Operational Emissions**. As shown in the table, the Project's operational-related emissions would not exceed the applicable SCAQMD thresholds. As such, impacts associated with Project operational regional emissions would be less than significant.

Table 11: Project Operational Emissions

Source	Maximum Daily Emissions (pounds per day)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Area[1]	3.44	0.04	4.79	<0.01	0.01	0.01
Energy[1]	0.00	0.00	0.00	0.00	0.00	0.00
Mobile – Trucks[1]	0.12	5.76	2.51	0.05	2.01	0.60
Mobile – Passenger Vehicles[1]	0.44	0.35	3.96	0.01	1.08	0.28
Emergency Fire Pump	0.11	0.08	0.05	<0.01	0.01	0.01
Off-Road Forklifts	0.04	0.23	3.21	<0.01	0.01	0.01
Total[2]	4.16	6.46	14.52	0.07	3.12	0.90
SCAQMD Threshold	55	55	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

[1] As recommended by the SCAQMD, emissions were calculated using CalEEMod version 2022.1 and the worst-case seasonal maximum daily emissions are reported.
[2] Totals may not add up exactly due to rounding in the modeling calculations.
ROG = reactive organic gases; NO_2 = nitrogen dioxide; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District PM_{10} = particulate matter 10 microns in diameter or less; $PM_{2.5}$ = particulate matter 2.5 microns in diameter or less; SCAQMD = South Coast Air Management District
Source: CalEEMod version 2022.1. Refer to **Appendix A** for the model outputs.

The operational emission sources are described below.

- **Area Source Emissions**. Area source emissions would be generated due to consumer products, architectural coatings, and landscaping equipment. Consumer products are various solvents used in non-industrial applications, which emit VOCs during product use. These typically include cleaning supplies, kitchen aerosols, cosmetics, and toiletries. The entire Project would not use consumer products as specified by the CalEEMod User Guide. The proposed warehouse building would include office spaces and may have small kitchen areas and bathrooms that would use cleaning products and kitchen aerosols, however the majority of the square footage of the proposed warehouse building would be used for warehousing and distribution. As such, negligible quantities of personal care products, home, lawn, and garden products, disinfectants, sanitizers, polishes, cosmetics, and floor finishes would be used.

  Area source emissions were calculated in CalEEMod using default rates based on a Statewide average. Therefore, ROG emissions are likely overestimated and therefore a conservative assumption for the purposes of this analysis.

- **Energy Source Emissions**. Energy source emissions (e.g., water heating systems) would be generated due to natural gas usage associated with the Project. However, the Project would be all-electric and would not connect to or utilize natural gas. Therefore, the Project would not generate energy source emissions.

- **Mobile Source Emissions.** Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, ROG, NO_X, PM_{10}, and $PM_{2.5}$ are all pollutants of regional concern. NO_X and ROG react with sunlight to form O_3, known as photochemical smog. Additionally, wind currents readily transport PM_{10}

and $PM_{2.5}$. However, CO tends to be a localized pollutant, dispersing rapidly at the source. Project-generated vehicle emissions are based on the trip generation estimates and have been incorporated into CalEEMod, as recommended by the SCAQMD. According to Table 1 in **Appendix L**, the Project would result in a net reduction of 422 total daily vehicle trips to the project site. As such, the Project would result in net mobile source emission reductions compared to existing conditions. However, it is conservatively assumed the Project would generate approximately 212 total daily vehicle trips (146 passenger vehicles and 66 truck vehicles). The mobile source emissions included in **Table 11** are therefore a conservative estimation.

CalEEMod defaults were adjusted to reflect the warehouse truck trip lengths and fleet mix characteristics. The warehouse truck trip lengths were increased to 33.2 miles, based on the distance to the Ports of Los Angeles and Long Beach, as well as CARB estimates for drayage trucks.[19] Trucks are classified by type (or axle configuration) into light heavy-duty trucks (LHDT), medium heavy-duty trucks (MHDT), and heavy heavy-duty trucks (HHDT), reflecting a mix of large trucks with 2, 3, and 4 or more axles. To better represent warehouse-specific operations, the warehouse fleet mix was adjusted to represent 17 percent LHDT, 23 percent MHDT, and 60 percent HHDT.[20] Mobile source emissions rates in CalEEMod utilized the CARB-developed EMission FACtors (EMFAC) 2021 emissions rates consistent with the methodology described in the CalEEMod User's Guide.

- **Emergency Fire Pump**. An emergency fire pump would only be used to provide additional water pressure for an early-suppression fast-response fire sprinkler system and would not be part of the Project's normal daily operations. Although the Project proposes an electric emergency fire pump, this analysis conservatively assumes the Project would utilize a diesel emergency fire pump. Therefore, emissions associated with a diesel emergency fire pump were included to be conservative. Emissions from a diesel emergency fire pump was calculated separately from CalEEMod using default emission rates; refer to **Appendix A**. If the Project were to install a diesel emergency fire pump, the end user (the future operator of the proposed warehouse building) would be required to obtain a permit from the SCAQMD prior to installation. The diesel emergency fire pump must comply with SCAQMD Rule 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines), which would minimize emissions if and when a diesel emergency fire pump is used.
- **Off-Road Forklifts.** Operational off-road emissions would be generated by off-road cargo handling equipment used during operational warehouse activities. Although the Project proposes three electric forklifts, it was conservatively assumed that the proposed warehouse building would utilize three diesel forklifts for loading and unloading goods. Emissions from diesel forklifts were calculated separately from CalEEMod using default emission rates; refer to **Appendix A**. It should be noted that the Project does not include cold storage. Therefore,

[19] California Air Resources Board. (N.D.). *Mobile Source Emissions Inventory (MSEI) Documentation – Drayage Trucks, Appendix B: Emissions Estimation Methodology for On-Road Diesel-Fueled Heavy-Duty Drayage Trucks at California Ports and Intermodal Rail Yards*. Retrieved from: https://ww2.arb.ca.gov/our-work/programs/mobile-source-emissions-inventory/msei-documentation-road-heavy-duty-diesel. Accessed September 9, 2025.

[20] WSP. (2017). *RCTC Truck Study and Regional Logistics Mitigation Fee, Technical Memorandum 1: Exiting and Future Conditions, Warehouse-Related Land Use Data & Truck Travel Patterns.*

this analysis models the proposed warehouse building as unrefrigerated, and the Project would not include emissions from transport refrigeration units.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact: Localized Construction Emissions. The SCAQMD provided the *Final Localized Significance Threshold Methodology* (dated June 2003 [revised 2008]) for guidance.[21] The LST methodology assists lead agencies in their project-specific analysis of the potential localized impacts associated with proposed projects. LSTs represent the maximum emissions of NO_X, CO, PM_{10}, and $PM_{2.5}$ generated at a project site that are not expected to cause or contribute to an exceedance of the CAAQS or NAAQS (the more stringent of the two).[22] The SCAQMD's methodology states that "off-site mobile emissions from the Project should not be included in the emissions compared to LSTs." Therefore, only the emissions included in the CalEEMod "on-site" emissions outputs were considered for the LST analysis.

The construction LSTs are based on the ambient concentrations of that pollutant for each SRA, distance to the nearest sensitive receptor, and daily acres disturbed. The project site is located in SCAQMD SRA 16 (North Orange County). The nearest sensitive receptors to the project site are residential uses located approximately 765 feet (233 meters) to the southeast.

Since CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily soil disturbance activity possible for each piece of equipment, **Table 12: Equipment-Specific Grading Rates** was used to determine the maximum daily disturbed acreage for the construction LST analysis.[23]

Table 12: Equipment-Specific Grading Rates

Construction Phase	Equipment Type	Equipment Quantity	Acres Graded per 8-Hour Day	Operating Hours per Day	Acres Graded per Day
Grading	Graders	1	0.5	8	0.5
	Dozers	1	0.5	8	0.5
				Total	**1**

[1] Total acres graded each day is based on the number of equipment hours and the maximum daily soil disturbance activity possible for each piece of equipment, not the total acreage of the project site.
Source: CalEEMod version 2022.1. Refer to **Appendix A** for model outputs.

Based on the daily construction equipment assumed for the Project and as identified in **Table 12**, Project construction is anticipated to disturb a maximum of 1-acre in a single day.

As the LST guidance provides thresholds for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters and projects disturbing 1-, 2-, and 5-acres in size, the LSTs for 1-acre at 200 meters in SCAQMD SRA 16 were utilized for this analysis.

21 South Coast Air Quality Management District. (N.D.) *Localized Significance Thresholds*. http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds. Accessed September 8, 2025.

22 Ibid.

23 South Coast Air Quality Management District. (2005). *Sample Construction Scenarios for Projects Less than Five Acres in Size*. https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-sample-construction-scenario-report.pdf?sfvrsn=2. Accessed September 8, 2025.

Table 13: Localized Project Construction Emissions summarizes the localized emissions during each individual and overlapping construction phase.

Table 13: Localized Project Construction Emissions

Construction Phase	Maximum Daily Emissions (pounds per day)[1, 2]			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Individual Construction Phases				
Demolition (2027)	19.90	18.63	5.51	1.45
Site Preparation (2027)	27.97	28.28	6.28	3.70
Grading (2027)	14.23	17.27	2.44	1.44
Infrastructure Improvements (2027)	3.66	5.14	0.10	0.09
Infrastructure Improvements (2028)	3.58	5.14	0.09	0.08
Building Construction (2027)	9.39	12.94	0.34	0.31
Building Construction (2028)	8.92	12.94	0.30	0.28
Architectural Coating (2028)	0.81	1.12	0.02	0.01
Paving (2028)	6.63	9.91	0.26	0.24
Overlapping Construction Phases[3]				
Infrastructure Improvements + Building Construction (2027)	13.05	18.08	0.44	0.40
Infrastructure Improvements + Building Construction (2028)	12.50	18.08	0.39	0.36
Building Construction + Paving (2028)	15.55	22.85	0.56	0.51
Maximum Emissions	27.97	28.28	6.28	3.70
SCAQMD Localized Screening Threshold (1-acre of disturbance at 200 meters)	159	1,975	53	20
Threshold Exceeded?	**No**	**No**	**No**	**No**

[1] As recommended by the SCAQMD, emissions were calculated using CalEEMod version 2022.1 and the worst-case seasonal maximum daily emissions are reported.
[2] SCAQMD Rule 403 Fugitive Dust applied for construction emissions. SCAQMD Rule 403 reduction/credits include: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; water all haul roads three times daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied.
[3] Totals may not add up exactly due to rounding in the modeling calculations.
NO_2 = nitrogen dioxide; CO = carbon monoxide; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter, SCAQMD = South Coast Air Management District
Source: CalEEMod version 2022.1. Refer to **Appendix A** for model outputs.

As shown in **Table 13**, pollutant emissions on the peak day of construction would not exceed the respective SCAQMD LSTs and therefore would not result in substantial concentrations of pollutants at the nearest sensitive receptors or cause or contribute to an exceedance of the CAAQS or NAAQS. Impacts associated with localized Project construction emissions would be less than significant.

Less Than Significant Impact: Airborne Fungus. Coccidioidomycosis, commonly known as Valley Fever, is a lung infection caused by inhaling airborne spores of the Coccidioides immitis fungus. These spores are typically found in soil and can become airborne when the ground is disturbed by wind, construction, farming, or other soil-disrupting activities. Once inhaled, the spores transform into spherules in the lungs, which grow and release endospores, continuing the infection cycle. Symptoms range from mild flu-like illness to more severe respiratory conditions, with fatigue,

cough, rash, and joint pain being the most common. While most healthy individuals recover fully within six months without treatment and gain lifelong immunity, certain populations (e.g., immunocompromised individuals) are at higher risk for developing severe or disseminated disease. Diagnosis requires laboratory testing, including serology, cultures, or microscopic examination. Though not contagious between people, Valley Fever poses a significant public health concern in endemic areas. The fungus is endemic to the southwestern United States, including parts of California such as the Antelope Valley. However, the Project site is not located in an endemic area for Valley Fever.[24] Therefore, impacts would be less than significant.

Less Than Significant Impact: Localized Operational Emissions. According to the SCAQMD LST methodology, LSTs would apply to the operational phase of a project only if it includes stationary sources or attracts mobile sources that may spend long periods queuing and idling at the project site (e.g. warehouse or transfer facilities). Since the Project proposes a warehouse building, the operational LST protocol is conservatively applied to both the stationary source emissions and a portion of the mobile source emissions.

The LST analysis only includes on-site sources. However, the CalEEMod model outputs do not separate on- and off-site emissions for mobile sources. For a worst-case scenario assessment, the emissions shown in **Table 14: Localized Project Operational Emissions**, conservatively include all on-site stationary sources, on-site emergency fire pump, on-site off-road forklifts, and on-site mobile sources, since a portion of mobile sources could include truck vehicles idling on the site.[25]

The project site is located in SCAQMD SRA 16 (North Orange County). The nearest sensitive receptors to the project site are residential uses located approximately 765 feet (233 meters) to the southeast. The project site is approximately 4.8 acres. The LST guidance provides thresholds for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters and for projects 1, 2, and 5 acres in size. Since LSTs increase with acreage, the LSTs for 5-acres at 200 meters in SCAQMD SRA 16 were utilized for this analysis.

Table 14: Localized Project Operational Emissions

Source	Maximum Daily Emissions (pounds per day)[1]			
	NO_X	CO	PM_{10}	$PM_{2.5}$
On-site Emission Sources (Area, Energy, Mobile – Trucks, Emergency Fire Pump, and Off-Road Forklifts)[1, 2]	0.52	8.13	0.08	0.04
SCAQMD Localized Screening Threshold (5-acre project site at 200 meters)	249	3,605	19	8
Threshold Exceeded?	**No**	**No**	**No**	**No**

[1] Mobile on-site emissions were calculated using the following: mobile on-site emissions = (vehicle on-site trip distance/vehicle total trip distance) * mobile emissions; where it is conservatively assumed the vehicle on-site trip distance is conservatively assumed to be approximately 1-mile and the vehicle total trip distance modeled in CalEEMod is 33.2-miles.
[2] Totals may not add up exactly due to rounding in the modeling calculations.
NO_2 = nitrogen dioxide; CO = carbon monoxide; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter, SCAQMD = South Coast Air Management District
Source: CalEEMod version 2022.1. Refer to **Appendix A** for model outputs.

[24] California Department of Public Health, *Valley Fever*, https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/ValleyFeverBasics.aspx, accessed October 2025.

[25] The on-site one-way trip length is conservatively assumed to be approximately 1-mile, which is approximately 3 percent of the 33.2-mile truck trip length modeled in CalEEMod.

Table 14 shows the peak day operational pollutant emissions would not exceed the respective SCAQMD LSTs and therefore would not result in substantial concentrations of pollutants at the nearest sensitive receptors or cause or contribute to an exceedance of the CAAQS or NAAQS. Impacts associated with localized Project operational emissions would be less than significant.

Less Than Significant Impact: Criteria Pollutant Health. On December 24, 2018, the California Supreme Court issued an opinion identifying the need to provide sufficient information connecting a project's air emissions to health impacts or explain why such information could not be ascertained (*Sierra Club v. County of Fresno* [Friant Ranch, L.P.] [2018] Cal.5th, Case No. S219783).

The SCAQMD has set its CEQA significance thresholds based on the FCAA, which defines a major stationary source (in extreme O_3 nonattainment areas such as the SCAB) as emitting 10 tons per year. The thresholds correlate with the trigger levels for the federal New Source Review (NSR) Program and SCAQMD Rule 1303 for new or modified sources. The NSR Program[26] was created by the FCAA to ensure that stationary sources of air pollution are constructed or modified in a manner that is consistent with attainment of health-based NAAQS, which establish the levels of air pollutant emissions necessary, with an adequate margin of safety, to protect the public health. Therefore, projects that do not exceed the SCAQMD's mass emissions thresholds and LSTs would not violate any NAAQS or CAAQS or contribute substantially to an existing or projected air quality violation. As such, no criteria pollutant health impacts would occur.

As previously discussed, localized impacts of on-site Project emissions on nearby sensitive receptors were found to be less than significant (refer to **Table 13** and **Table 14**). The LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent NAAQS or CAAQS. The LSTs were developed by the SCAQMD based on the ambient concentrations of that pollutant for each SRA and distance to the nearest sensitive receptor. The NAAQS and CAAQS establish the levels of air pollutant emissions necessary, with an adequate margin of safety, to protect public health, including protecting the health of sensitive populations. Information on health impacts related to exposure to O_3 and particulate matter emissions published by the U.S. EPA and CARB have been summarized and discussed above in the Regulatory section. Since Project-related emissions would not exceed the regional thresholds or the LSTs, Project-related emissions would not exceed the CAAQS or NAAQS or cause an increase in the frequency or severity of existing violations of air quality standards. Therefore, sensitive receptors would not be exposed to criteria pollutant levels in excess of the health-based ambient air quality standards. Impacts associated with Project criteria pollutant health effects would be less than significant.

Less Than Significant Impact: Toxic Air Contaminants

Construction. Project construction would result in temporary increases in TACs emissions such as DPM from off-road diesel equipment and vehicle trips. The use of diesel-powered construction equipment and vehicle trips would be temporary and episodic. The duration of exposure would be short, and the exhaust from construction equipment dissipates rapidly. The amount to which the receptors are exposed (a function of concentration and duration of exposure) is the primary factor

[26] Code of Federal Regulation (CFR) [i.e., PSD (40 CFR 52.21, 40 CFR 51.166, 40 CFR 51.165 (b)), Nonattainment NSR (40 CFR 52.24, 40 CFR 51.165, 40 CFR part 51, Appendix S).

used to determine health risk (i.e., potential exposure to TAC emission levels that exceed applicable standards). Health-related risks associated with DPM emissions are primarily associated with long-term exposure and associated risk of contracting cancer. As such, the calculation of cancer risk associated with exposure to TACs is typically calculated based on a long-term period of exposure. Based on updated guidelines from the Office of Environmental Health Hazard Assessment, cancer risks are based on constant daily exposure for 30 years for off-site residential receptors and 25 years for off-site worker receptors. Construction activities would occur over an approximately 13-month period, which would constitute approximately three percent of the residential and four percent of the worker exposure durations. Furthermore, Project compliance with California regulations (e.g., California Code of Regulations [CCR], Title 13, Sections 2485 and 2449), which reduce DPM and criteria pollutant emissions from in-use off-road diesel-fueled vehicles and limit the idling of heavy-duty construction equipment to no more than five minutes, would further reduce nearby sensitive receptors' exposure to temporary and variable DPM emissions. TAC impacts during Project construction would be less than significant.

Operations. The Project would generate toxic air contaminants (i.e., DPM) from heavy-duty truck operations. As noted above, cancer risks are based on constant daily exposure for 30 years for off-site residential receptors and 25 years for off-site worker receptors according to OEHHA methodologies. The nearest sensitive receptors to the project site are residential uses located approximately 765 feet to the southeast. Therefore, the nearest sensitive receptors would have limited exposure to on-site emissions due to distance attenuation and the highly dispersive nature of TACs. Additionally, CAPCOA guidance advises avoiding siting sensitive uses within 1,000 feet of distribution centers with more than 100 trucks per day. Under existing conditions, the project site currently generates 28 truck trips per day. As the Project is expected to generate 66 truck trips per day, the Project would result in a net increase of 38 truck trips. Therefore, the Project-generated truck trips would be well below the 100 trucks per day threshold. Therefore, significant health risks related to operational DPM emissions are not anticipated and a quantitative health risk assessment is not required. Additionally, the Project's criteria pollutant emissions would remain below SCAQMD's thresholds for regional and local air quality standards, indicating no significant long-term health impacts; refer to **Table 11** and **Table 14**. Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations of TACs during operations. Impacts associated with Project operational TAC emissions would be less than significant.

Less Than Significant Impact: Carbon Monoxide Hotspots. An analysis of CO "hot spots" is needed to determine whether the change in the level of service of an intersection from the proposed Project would have the potential to result in exceedances of the CAAQS or NAAQS. It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when vehicles are idling at intersections. Vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the CO standard in California is a maximum of 3.4 grams per mile for passenger cars (requirements for certain vehicles are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations have steadily declined.

Accordingly, with the steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard. CO attainment within the SCAB was thoroughly

analyzed as part of the SCAQMD's 2003 AQMP. The SCAB was re-designated as attainment in 2007 and is no longer addressed in the SCAQMD's AQMP.

The 2003 AQMP is the most recent AQMP that addresses CO concentrations. As part of the SCAQMD CO hot spot analysis, the Wilshire Boulevard and Veteran Avenue intersection, one of the most congested intersections in Southern California with an ADT volume of approximately 100,000 vehicles per day, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 parts per million (ppm), which is well below the 35-ppm federal standard. The proposed project considered herein would not produce the volume of traffic required to generate a CO hot spot in the context of SCAQMD's 2003 CO hot-spot analysis. As the CO hotspots were not experienced at the Wilshire Boulevard and Veteran Avenue intersection even as it accommodates 100,000 vehicles daily, it can be reasonably inferred that CO hotspots would not be experienced at any intersection within the Project vicinity from the 212 daily vehicle trips attributable to the Project. As such, impacts associated with Project CO hot spots would be less than significant.

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

Less Than Significant Impact: Construction Odor. Project construction would generate odors from equipment diesel exhaust, architectural coatings containing VOCs, and paving activities. However, these odors would be temporary, are not expected to affect a substantial number of people and would disperse rapidly. Additionally, the Project would be required to comply with SCAQMD Rule 402 (Nuisance) to prevent odor nuisances on sensitive receptors. SCAQMD Rule 402 (Nuisance) 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."

Construction odors would be further minimized through Project compliance with heavy-duty construction equipment idling requirements (CCR, Title 13, Sections 2449(d)(3) and 2485,) and established regulations that address construction materials storage, use, and disposal (Code of Federal Regulation, Part 1926 – Safety and Health Regulations for Construction, Subpart H – Materials Handling, Storage Use and Disposal, et al.). As such, impacts associated with Project construction odors would be less than significant.

Less Than Significant Impact: Operational Odor: The SCAQMD *CEQA Air Quality Handbook* identifies certain land uses as potentially significant sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The Project proposes the development of a warehouse, which would not involve the types of uses that would emit objectionable odors affecting considerable numbers of people. Therefore, the Project would not include any of the land uses that have been identified by the SCAQMD as significant odor sources. Impacts associated with Project operational odor would be less than significant.

4.4 BIOLOGICAL RESOURCES

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
4. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			X	
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?				X
c) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			X	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?				X

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Less Than Significant Impact. The project site is located within an urbanized area and is currently developed with a business park and associated improvements, including surface parking and ornamental landscaping. The surrounding area is developed and comprised primarily of industrial and commercial uses. As indicated in The Fullerton Plan EIR, the areas outside of the West Coyote

Hills and East Coyote Hills Focus Areas are primarily developed and do not contain areas of naturally vegetated vacant land with natural vegetation supportive of sensitive species.

The project site and surrounding area do not provide suitable habitat for any special status species, are devoid of sensitive habitat, and do not contain wetlands or wetland habitat. The project site does contain ornamental vegetation with the potential of providing suitable nesting habitat for birds. The Project would be required to comply with standard condition (SC) BIO-1, which would require construction activities to be completed in compliance with the Migratory Bird Treaty Act (MBTA) and Sections 3503, 3503.5, 3513 of the California Fish and Game Code (CFGC). Under MBTA provisions, it is unlawful "by any means or manner to pursue, hunt, take, capture (or) kill" any migratory birds except as permitted by regulations issued by the USFWS. The term "take" is defined by USFWS regulation to mean to "pursue, hunt, shoot, wound, kill, trap, capture or collect" any migratory bird or any part, nest or egg of any migratory bird covered by the conventions, or to attempt those activities. Following compliance with SC BIO-1, the proposed Project's potential impacts to nesting migratory birds would be less than significant and no mitigation is required.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service? Or,

c) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological?

No Impact. As noted above, the project site is located within an urbanized area and is currently developed with a business park and associated improvements, including surface parking and ornamental landscaping. The surrounding area is developed and comprised primarily of industrial and commercial uses. Based on review of the U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory, the project site does not contain any mapped features.[27] Further, the project site does not contain any water resources (e.g., streams, creeks, channels, vernal pools) nor would any of the proposed land uses potentially affect wetlands. The project site does not contain riparian habitats, sensitive natural communities, or wetlands. Therefore, the proposed Project would not have a substantial adverse effect on any riparian habitat, other sensitive natural community, or federally protected wetlands, and no impact would occur.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact. A wildlife corridor can be defined as a physical feature that links wildlife habitats, often consisting of native vegetation that joins two or more larger areas of similar wildlife habitat. Corridors enable migration, colonization, and genetic diversity through interbreeding and are therefore critical for the movement of animals and the continuation of viable populations. As indicated in The Fullerton Plan EIR, although the East Coyote Hills and West Coyote Hills areas contain significant plant and animal populations, these areas are isolated from one another by three miles of urbanization and are surrounded by developed areas. Therefore, they do not provide reliable connections to other large habitat patches. Areas outside of the East Coyote

[27] U.S. Fish and Wildlife Service. N.D. *National Wetlands Inventory*. https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper. Accessed September 2025.

Hills and West Coyote Hills areas, such as the project site, are urbanized and generally do not function as wildlife corridors.

As indicated, the project site is located within an urbanized area and is currently developed with a business park and associated improvements, including surface parking and ornamental landscaping. The surrounding area is developed and comprised primarily of industrial and commercial uses. The project site and surrounding area do not serve as a native resident or migratory wildlife corridor or wildlife nursery site, as the area is completely developed and there are no open space areas or corridors within or adjacent to the project site.

While the project site is not a wildlife corridor, it has the potential to support nesting migratory birds that are protected by the MBTA and CFGC. Therefore, potential impacts could occur if vegetation clearing is undertaken during the breeding season. The Project would be required to comply with SC BIO-1, which outlines MBTA and CFGC requirements including pre-construction nesting bird surveys if avoidance during the nesting season is not feasible. If active nests are identified, suitable buffers would be established and the buffer areas would be avoided until the nests are no longer occupied, and the juvenile birds can survive independently from the nests. Therefore, following compliance with SC BIO-1, the proposed Project's potential impacts to nesting migratory birds would be less than significant and no mitigation is required.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant Impact. FMC Chapter 9.06, Community Forestry, addresses the planning, planting, maintenance, and removal of all trees and other landscape material in any street or other public area; over any landscape material in any street median, parkway strip or other landscaped portion of a public right-of-way; over trees and other landscape material in other public spaces under the jurisdiction of the City such as parks, trails and public buildings; and over certain trees on private property. It also allows for the designation and protection of Landmark Trees.

The Project would involve the removal of existing trees on the property, including along the frontage of the project site; no City trees would be removed and no Landmark Trees are located on the site. The Project would provide new trees, shrubs, and ground cover within the project site. The proposed trees and landscaping would be in accordance with the City's requirements. The Project would be required to comply with SC BIO-2, which would require approval of a plot plan prior to the issuance of a building permit, in compliance with FMC Section 9.06.090, Planting Trees. Implementation of this standard condition would ensure impacts remain less than significant.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?

No Impact. The project site is not located within the boundaries of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. Therefore, the Project would not conflict with any of these plans and no impact would occur.

Standard Conditions and Requirements

SC BIO-1 **Nesting Migratory Birds.** To ensure compliance with the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC) Sections 3503, 3503.5, and 3513 and to avoid potential impacts to nesting birds, vegetation clearing, and ground-disturbing activities shall be conducted outside of the bird nesting season (generally January 15 to August 31 for raptors and February 15 to August 31 for other bird species). If avoidance of the nesting season is not feasible, then a qualified biologist shall conduct a nesting bird survey within seven days prior to any disturbance of the site, including but not limited to vegetation clearing, disking, demolition activities, and grading. If the qualified biologist determines that no active bird or raptor nests occur, the activities shall be allowed to proceed without any further requirements.

If active nests of any species protected by the MBTA or CFGC are identified, the biologist shall establish suitable disturbance limit buffers around the nests marked using flagging or staking. The disturbance limit buffer size shall depend on the site conditions, level of activity within the buffer, and species observed. The disturbance limit buffer zones shall be avoided until the nests are no longer occupied. Any active nests shall be monitored by a qualified biologist during active construction, at a frequency determined using their best professional judgment, but not less than twice per week. If potential affects to nesting birds are observed, avoidance and minimization measures may be adjusted, and construction activities stopped or redirected by the qualified biologist using their best professional judgement to avoid take of nesting birds. Once a nest is no longer occupied and the juvenile birds can survive independently from the nest, the project can proceed without further regard to the nest site.

SC BIO-2 **Tree Planting.** All tree plantings, removals, or alterations associated with the project shall be conducted in accordance with the requirements set forth in the Fullerton Community Forestry Ordinance (Fullerton Municipal Code, Chapter 9.06 et seq.). Specifically, in compliance with Section 9.06.090, Planting Trees, prior to the issuance of a building permit, the Applicant/Developer shall submit a Plot Plan of the proposed development so the Director of Development Services can determine the tree requirements for site development. The plot plan shall:

1. Clearly show all existing trees, noting location, species, size, and condition;
2. Note whether existing trees will be retained, removed, or relocated;
3. Show proposed utilities, driveways, sidewalks and tree planting locations, and the size and species of proposed street trees; and
4. Conform with ground and aerial setback specifications, as defined in the Community Forest Management Plan.

4.5 CULTURAL RESOURCES

ENVIRONMENTAL IMPACTS		Potentially Significant Issues	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
5.	**CULTURAL RESOURCES. Would the project:**				
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?				X
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?		X		
c)	Disturb any human remains, including those interred outside of dedicated cemeteries?		X		

A Cultural Resources Inventory and Evaluation Report has been prepared for the proposed Project and is included in **Appendix B: Cultural Resources Memorandum** in this Initial Study and summarized below.

a) Cause a substantial adverse change in the significance of a historical resource pursuant to in Section 15064.5?

No Impact. State CEQA Guidelines Section 15064.5 defines "historic resources" as resources listed in the California Register of Historical Resources or determined to be eligible by the California Historical Resources Commission for listing in the California Register of Historic Resources.[28] CEQA allows local historic resource guidelines to serve as the California Register of Historic Resources criteria if enacted by local legislation to act as the equivalent of the State criteria. The project site is currently developed with an existing five-building multi-tenant business park that was constructed in 1983. Review of historical aerial imagery dating back to 1952 shows that the project site was planted agricultural land. By 1980, large warehouses were constructed adjacent to the project site to the east, west, and south. By 1987, the project site was developed into its current configuration with five buildings and a parking area.

A cultural resources records search was conducted on July 22, 2025 through the South Central Coastal Information Center (SCCIC) for the project site and a 0.5-mile buffer. Results indicated that no cultural resources have been previously recorded on and that no cultural studies have been conducted at the project site (**Appendix B**). Results noted that 17 cultural studies have been conducted within the 0.5-mile buffer that resulted in the recordation of one cultural resource. The resource, identified as P-19-18604/P-30-176663, is located approximately 0.4 mile to the north of the project site and is noted as the Burlington Northern Santa Fe (BNSF, formerly Atchison, Topeka, and Santa Fe) Railway, originally constructed in 1888.

In addition, as part of the Cultural Memorandum prepared for the Project, a review of the following cultural resource databases were conducted: National Register of Historic Places, California Register of Historic Places, National Historic Landmarks, and the Built Environment Resources

[28] California Public Resources Code Section 5020.1(k), Section 5024.1(g).

Directory. A review of resource databases and repositories did not result in the identification of any present cultural resources in the project site.

Additionally, The Fullerton Plan EIR does not identify any historic resources structures located on the project site, nor is the project site located within a historic district in the City.[29] Therefore, no known historical resources pursuant to Section 15064.5 were identified on the project site, and the proposed Project would not cause a change in the significance of a historical resource. No impact would occur and no mitigation is required.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Less Than Significant Impact with Mitigation Incorporated. As stated above, results of the records search indicate that 17 cultural studies have been conducted within the 0.5-mile buffer that resulted in the recordation of one cultural resource. The one resource, identified as P-19-18604/P-30-176663, is located approximately 0.4 mile to the north of the project site and is noted as the Burlington Northern Santa Fe (BNSF, formerly Atchison, Topeka, and Santa Fe) Railway, originally constructed in 1888. No resources were documented within or adjacent to the project site. A request was submitted to the Native American Heritage Commission (NAHC) to review the Sacred Lands File (SLF) database for any sacred landscape or Tribal resources within or near the project site. A negative response was received on September 5, 2024, which indicated that no recorded SLFs were on file within or near the project site.

Geologic maps indicate the project site is underlaid by young alluvial fan deposits (Qyf) from the Holocene and late Pleistocene periods. These deposits are known to have a higher potential to contain archeological resources. The Cultural Memorandum prepared for the Project concluded that due to the presence of Holocene-age subsurface sediments and the proximity to available freshwater sources in the vicinity, the sensitivity of the project site for containing intact buried prehistoric archaeological resources would be considered moderate to high. However, due to the absence of known prehistoric archaeological sites in the immediate area and the prior construction and development of the existing business park, the potential to encounter intact buried archaeological resources on the site is considered low (**Appendix B**).

As such, archaeological resources are not anticipated to occur; however, there is the potential for unknown or undiscovered resources to be uncovered through construction activities. Therefore, the proposed Project would be subject to MM CUL-1, which requires that in the event of an inadvertent discovery of a cultural resource, earthwork and ground-disturbing activities would halt within 60 feet and the Project archaeologist would coordinate with the City and consulting Tribes to ensure appropriate identification and evaluation of the artifact and resource. If resources are potentially significant, the archaeologist would prepare a mitigation plan for approval by the City and consulting tribe. Therefore, with implementation of MM CUL-1, the proposed Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5; impacts would be less than significant impact with mitigation incorporated.

[29] City of Fullerton. 2012. *The Fullerton Plan Final Program EIR – Section 5.10 Cultural Resources*. Retrieved from: https://www.cityoffullerton.com/home/showpublisheddocument/3686/637470826615030000. Accessed September 2025.

c) Disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact with Mitigation Incorporated. No dedicated cemeteries are on or near the project site. The disturbance of most Native American human remains is typically in association with prehistoric archaeological sites. As discussed previously, the project site is not near an identified archaeological resource. Given the extent of on-site disturbances the project site has a low potential for intact archaeological resources. However, as noted above, due to the presence of Holocene-age subsurface sediments and proximity to water, there is low potential for the Project's ground-disturbing activities to encounter human remains. Notwithstanding, if previously unknown human remains are discovered during the Project's ground-disturbing activities, a substantial adverse change in the significance of such a resource could occur. If human remains are found, implementation of MM TCR-2 would be required, which details compliance with California State Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98 for inadvertent discovery of human remains. Therefore, with implementation of MM TCR-2, the proposed Project would not disturb any human remains, including those interred outside of a dedicated cemetery. A less than significant impact would occur with mitigation incorporated.

Mitigation Measures

MM CUL-1 In the event that archaeological resources are inadvertently unearthed or encountered during demolition, excavation, and/or grading activities, all work within 60 feet of the find shall cease and an archaeologist that meets Secretary of Interior professional qualifications in archaeology and the consulting Tribes, if any, shall be contacted. The archaeologist shall record and evaluate the resource for potential significance. The lead agency shall confer with the consulting Tribes, if any, regarding the significance of the resource and its potential as a Tribal Cultural Resource (TCR) under CEQA. Should the archaeologist and/or consulting Tribes have concerns that the find is potentially significant, the archaeologist shall prepare a mitigation plan for review and approval by the lead agency and any consulting Tribes. If avoidance of the resource(s) is not feasible, salvage operation requirements pursuant to State CEQA Guidelines Section 15064.5 shall be followed.

4.6 ENERGY

ENVIRONMENTAL IMPACTS	Potentially Significant Issues	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
6. ENERGY. Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?			X	

Energy calculations and results are included in **Appendix C: Energy Calculations** and summarized below.

Background

Energy consumption is analyzed due to the potential direct and indirect environmental impacts associated with the Project. Such impacts include the depletion of non-renewable resources and pollutant emissions during short-term construction and long-term operational phases.

Electricity. Over the past 15 years, electricity generation in California has undergone a transition. Historically, California has relied heavily on oil- and gas-fired plants to generate electricity. Spurred by regulatory measures and tax incentives, California's electrical system has become more reliant on renewable energy sources, including cogeneration, wind energy, solar energy, geothermal energy, biomass conversion, transformation plants, and small hydroelectric plants. Unlike petroleum production, electricity generation is not usually tied to the location of the fuel source and can be delivered over great distances via the electrical grid.

Energy capacity, or electrical power, is generally measured in watts (W) while energy use is measured in watt-hours (Wh). For example, if a light bulb has a capacity rating of 100 W, the energy required to keep the bulb on for one hour would be 100 Wh. If ten 100 W bulbs were on for one hour, the energy required would be 1,000 Wh or one kilowatt-hour (kWh). On a utility scale, a generator's capacity is typically rated in megawatts (MW), which is one million watts, while energy use is measured in megawatt-hours (MWh) or gigawatt-hours (GWh), which is one billion watt-hours.

Southern California Edison (SCE) is the City's electricity provider and provides electricity to approximately 15 million people, 180 incorporated cities, 15 counties, 5,000 large businesses, and 280,000 small businesses throughout its 50,000-square-mile service area.[30] SCE produces and purchases their energy from a mix of conventional and renewable generating sources. **Table 15: Energy Resources Used to Generate Electricity for South California Edison** identifies the SCE 2023 electric power mix compared to the Statewide 2023 power mix.

[30] South California Edison. (N.D.). *By the Numbers: Who We Serve*. Retrieved from: https://www.sce.com/about-us/who-we-are. Accessed September 8, 2025.

Table 15: Energy Resources Used to Generate Electricity for South California Edison

Energy Resources	2023 SCE Power Mix	2023 CA Power Mix
Eligible Renewable[1]	37.6%	36.9%
Biomass and Biowaste	0.1%	2.1%
Geothermal	5.2%	4.8%
Eligible Hydroelectric	0.7%	1.8%
Solar	19.8%	17.0%
Wind	11.7%	11.2%
Coal	0.0%	1.8%
Large Hydroelectric	4.5%	11.7%
Natural Gas	20.0%	36.6%
Nuclear	9.1%	9.3%
Other	0.1%	0.1%
Unspecified Sources of Power[2]	28.8%	3.7%
Total	**100.0%**	**100.0%**

[1] The eligible renewable percentage above does not reflect the Renewable Portfolio Standard compliance, which is determined using a different methodology.
[2] Electricity that has been purchased through open market transactions and are not traceable to specific generation sources.
Source: South California Edison. (N.D.). *2023 Power Content Label, Southern California Edison Company.* https://www.energy.ca.gov/filebrowser/download/7362. Accessed September 8, 2025.

According to the California Energy Commission (CEC), in 2024, the total electricity demand for the SCE service area was approximately 282,783 GWh, while electricity use attributable to the County was approximately 19,225 GWh.[31] The residential, non-residential, and total electricity demand between 2014 and 2024 in the County is summarized in **Table 16: Annual Orange County Electricity Consumption**. In 2014, residential uses comprised 35 percent of the County's electricity demand, while non-residential uses comprised 65 percent. By 2024, these percentages changed to 37 percent for residential uses and 41 percent for non-residential uses. Although the total electricity demand has fluctuated from year to year, overall, between 2014 and 2024, the County's total electricity demand decreased by approximately seven percent.

[31] California Energy Commission. (2025). *Electricity Consumption*. Retrieved from: https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-0. Accessed September 8, 2025.

Table 16: Annual Orange County Electricity Consumption			
Year	Million Kilowatt-Hour (GWh)		
	Residential Electricity Consumption	Non-residential Electricity Consumption	Total Electricity Consumption
2024	7,136.36	12,088.79	19,225.15
2023	6,863.69	11,989.58	18,853.26
2022	7,248.21	12,324.02	19,572.24
2021	7,079.36	11,649.68	18,729.04
2020	7,499.77	11,663.68	19,163.45
2019	6,763.44	12,641.46	19,404.90
2018	6,778.06	13,154.40	19,932.46
2017	6,760.51	13,318.86	20,079.37
2016	6,672.07	13,512.77	20,184.84
2015	6,892.71	13,840.86	20,733.57
2014	6,987.88	13,622.43	20,610.31
Source: California Energy Commission. (2025). *Electricity Consumption.* https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-0. Accessed September 8, 2025.			

Transportation. Of California's total energy usage, the breakdown by sector is 44.5 percent transportation, 21.4 percent industrial, 17.1 percent residential, and 17.0 percent commercial.[32] Transportation energy demand in California is largely related to vehicular traffic (e.g., passenger vehicles, light duty trucks, semi-trucks, etc.), with most transportation-related energy demand currently met by gasoline and diesel fuel. Gasoline and diesel fuel is supplied to City residents and non-residents by widely distributed service stations both inside and around the City. **Table 17: Annual Orange County Automotive Fuel Consumption** summarizes the gasoline and diesel fuel demand between 2014 and 2024 in the County. As shown in the table, between 2014 and 2024, the County's gasoline consumption has increased by approximately 0.003 percent and diesel consumption has increased by approximately 18 percent.

Table 17: Annual Orange County Automotive Fuel Consumption		
Year	Million Gallons	
	Gasoline Consumption	Diesel Consumption
2024	1,142.03	135.73
2023	1,164.40	134.66
2022	1,181.10	133.11
2021	1,191.38	131.23
2020	1,053.93	126.41
2019	1,214.39	126.23
2018	1,192.66	125.69
2017	1,200.68	128.63
2016	1,198.45	125.02
2015	1,165.32	117.23
2014	1,138.33	114.86
Source: California Air Resources Board. (2022). *EMFAC2021, Emissions Inventory.* https://arb.ca.gov/emfac/emissions-inventory/cd60f29daaedd924a75a9316202d7f56a9b573e5. Accessed September 8, 2025.		

[32] United States Energy Information Administration. (2025). California State Profile and Energy Estimates, California Energy Consumption by End-Use Sector. Retrieved from: https://www.eia.gov/state/?sid=CA#tabs-2. Accessed September 8, 2025.

Regulations

Energy and Independence Security Act of 2007

The Energy Independence and Security Act (EISA; Public Law 110-140) was signed into law by former President George W. Bush on December 19, 2007. The purpose of the EISA is to achieve energy security in the United States by increasing renewable fuel production, improving energy efficiency and performance, protecting consumers, improving vehicle fuel economy, and promoting research on GHG capture and storage. Under the EISA, the Renewable Fuel Standard (RFS) program (RFS2) was expanded in several key ways:

- Expanded the RFS program to include diesel, in addition to gasoline;
- Increased the volume of renewable fuel required to be blended into transportation fuel;
- Established new categories of renewable fuel and set separate volume requirements for each; and
- Required the U.S. EPA to apply lifecycle GHG performance threshold standards to ensure that each category of renewable fuel emits fewer GHGs than the petroleum fuel it replaces.

RFS2 lays the foundation for achieving significant reductions of GHG emissions from the use of renewable fuels, reducing imported petroleum, and encouraging the development and expansion of our nation's renewable fuels sector.

The EISA also includes a variety of new standards for lighting and for residential and commercial appliance equipment. The equipment includes residential refrigerators, freezers, refrigerator-freezers, metal halide lamps, and commercial walk-in coolers and freezers.

Renewable Portfolio Standards[33]

In 2002, California established its Renewable Portfolio Standard (RPS) program with the goal of increasing the annual percentage of renewable energy in the State's electricity mix by the equivalent of at least one percent of sales, with an aggregate total of 20 percent by 2017. The California Public Utilities Commission (CPUC) subsequently accelerated that goal to 2010 for retail sellers of electricity (Public Utilities Code §399.15(b)(1)). Then-Governor Schwarzenegger signed Executive Order S-14-08 in 2008, increasing the target to 33 percent renewable energy by 2020. In September 2009, Governor Schwarzenegger continued California's commitment to the RPS by signing Executive Order S-21-09, which directs under its AB 32 authority to enact regulations to help the State meet its RPS goal of 33 percent renewable energy by 2020. In September 2010, CARB adopted its Renewable Electricity Standard regulations, which require all of the State's load-serving entities to meet this target. In October 2015, then-Governor Brown signed into legislation Senate Bill (SB) 350, which requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from eligible renewable energy resources by 2030. Signed in 2018, SB 100 revised the goal of the program to achieve the 50 percent renewable resources target by December 31, 2026, and to achieve a 60 percent target by December 31, 2030.

SB 100 established a further goal to have an electric grid that is entirely powered by clean energy by 2045. Under SB 100, the State cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target. Approved in 2022, SB 1020 revised the

[33] California Public Utilities Commission. (2025). *Renewable Portfolio Standard (RPS) Program.* Retrieved from: https://www.cpuc.ca.gov/rps/. Accessed September 2025.

State policy to provide that eligible renewable energy resources and zero-carbon resources supply 90 percent of all retail sales of electricity to California end-use customers by December 31, 2035; 95 percent of all retail sales of electricity to California end-use customers by December 31, 2040; 100 percent of all retail sales of electricity to California end-use customers by December 31, 2045; and, 100 percent of electricity procured to serve all State agencies by December 31, 2035.

California Building Energy Efficiency Standards: Title 24, Part 6

The California Energy Code (Title 24, Part 6) was created as part of the California Building Standards Code (Title 24 of the CCR) by the California Building Standards Commission in 1978 to establish statewide building energy efficiency standards to reduce California's energy use. In general, Title 24 Energy Code is designed to reduce wasteful and unnecessary energy consumption in newly constructed and existing buildings. The CEC updates the Title 24 Energy Code every three years to allow consideration and possible incorporation of new energy efficiency technologies and methods. The Title 24 Energy Code conserve non-renewable resources, such as natural gas, and ensure renewable resources are extended as far as possible to reduce the need for constructing new power plants.

In December 2024, the 2025 Title 24 Energy Code was approved by the California Building Standards Commission for inclusion into the California Building Standards Code. The 2025 Title 24 Energy Code encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2026, must comply with the 2025 Title 24 Energy Code.

The Title 24 Energy Code include provisions applicable to all buildings, residential and non-residential, which describe requirements for documentation and certificates that the building meets the standards. These provisions include mandatory requirements for efficiency and design of the following types of systems, equipment, and appliances: air conditioning systems; heat pumps; water chillers; gas- and oil-fired boilers; cooling equipment; water heaters and equipment; pool and spa heaters and equipment; gas-fired equipment including furnaces and stoves/ovens; windows and exterior doors; joints and other building structure openings (envelope); insulation and cool roofs; lighting control devices; and solar photovoltaic systems.

The standards include additional mandatory requirements for space conditioning (cooling and heating), water heating, indoor and outdoor lighting systems, as well as equipment in non-residential, high-rise residential, and hotel or motel buildings. Mandatory requirements for low-rise residential buildings cover indoor and outdoor lighting, fireplaces, space cooling and heating equipment (including ducts and fans), and insulation of the structure, foundation, and water piping. The standards require solar photovoltaic systems for new homes. In addition to the mandatory requirements, the standards call for further energy efficiency that can be provided through a choice between performance and prescriptive compliance approaches. Separate sections apply to low-rise residential and to non-residential, high-rise residential, and hotel or motel buildings. In buildings designed for mixed use (e.g., commercial and residential), each section must meet the standards applicable to that type of occupancy.

California Green Building Standards

The California Green Building Standards Code (CCR, Title 24, Part 11), commonly referred to as the CALGreen Code, is a statewide mandatory construction code that was developed and adopted by the California Building Standards Commission and the California Department of Housing and Community

Development. CALGreen standards require new residential and commercial buildings to comply with mandatory measures under five topical areas: planning and design; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality. CALGreen also provides voluntary tiers and measures that local governments may adopt which encourage or require additional measures in the five green building topics. The most recent update to the CALGreen Code was adopted in December 2024 (2025 CALGreen Code) and continues to improve upon the existing standards for new construction of, and additions and alterations to, residential and non-residential buildings. Buildings whose permit applications are applied for on or after January 1, 2026, must comply with the 2025 CALGreen Code.

California Air Resources Board Scoping Plan

Adopted December 15, 2022, CARB's 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB 1279. To achieve the targets of AB 1279, the 2022 Scoping Plan relies on existing and emerging fossil fuel alternatives and clean technologies, as well as carbon capture and storage. Specifically, the 2022 Scoping Plan focuses on zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high global warming potential (GWP); providing communities with sustainable options for walking, biking, and public transit; displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines); and scaling up new options such as green hydrogen.

The key elements of the 2022 CARB Scoping Plan focus on transportation. Specifically, the 2022 Scoping Plan aims to rapidly move towards ZE transportation (i.e., electrifying cars, buses, trains, and trucks), which constitutes California's single largest source of GHGs. The regulations that impact the transportation sector are adopted and enforced by CARB on vehicle manufacturers and are outside the jurisdiction and control of local governments. The 2022 Scoping Plan accelerates development of new regulations as well as amendments to strengthen regulations and programs already in place.

The Fullerton Plan

The Fullerton Plan establishes goals and policies aimed at sustaining and conserving energy and fuel consumption within the City. The following policies are applicable to the proposed Project:

P1.12 **Energy- and Resource-Efficient Design** Support projects, programs, policies and regulations to encourage energy and resource efficient practices in site and building design for private and public projects.

P6.12 **Bicycle Parking and Facilities** Support projects, programs, policies, and regulations to provide convenient bicycle parking and other bicycle facilities in existing and potential high demand locations within the City, such as educational institutions, parks, business districts, transit stops, retail, commercial and employment centers.

P22.2 **GHG Emissions from Electrical Generation** Support regional and subregional efforts to reduce greenhouse gas emissions associated with electrical generation through energy conservation strategies and alternative/renewable energy programs.

P22.9 **Development** Support projects which voluntarily desire to implement site and/or building design features exceeding minimum requirements to reduce project greenhouse gas emissions.

Methodology

This section analyzes energy use from electricity and transportation fuel associated with Project construction and operations. It should be noted that the project would not connect to or utilize natural gas. The electricity associated with Project water usage was quantified using the water usage and water energy intensity factors from the *CalEEMod User Guide, Appendix G*. The Project building electricity usage was based on CalEEMod, which quantifies energy use for occupancies using default rates. The solar panel energy reduction was quantified using the hourly capacity, assumed to be 34.1 kW, and the annual average sun exposure; refer to **Appendix A**. Transportation fuel associated with Project construction worker, vendor, and haul truck trips were quantified using CalEEMod emission outputs and conversation ratios from the Climate Registry. Transportation fuel associated with Project operational vehicle trips was quantified using CalEEMod outputs and CARB EMFAC2021 for typical daily fuel usage in the County. The energy associated with Project construction and operations was compared to the County's annual energy consumption.

Impact Analysis

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact: Construction Energy. Project construction would consist of demolition, site preparation, grading, infrastructure improvements, building construction, paving, and architectural coating applications.[34] Project construction activities would occur over approximately 13 months, anticipated to begin as early as the third quarter of 2027 and ending as early as the third quarter of 2028. Project construction would include electricity use associated with water utilized for dust control, diesel fuel from on-road hauling trips, vendor trips, and off-road construction diesel equipment, as well as gasoline fuel from on-road worker commute trips. Because construction activities typically do not require natural gas, it is not included in the following discussion. Energy usage associated with Project construction is summarized in **Table 18: Project Construction Energy Consumption**.

[34] Although not proposed, the modeled Project construction equipment and water usage conservatively account for the full-width grind and overlay improvements along Cypress Way.

Table 18: Project Construction Energy Consumption

Source	Project Construction Energy	Orange County Annual Energy[1, 2]	Percentage Increase Countywide
Electricity (GWh)			
Water	0.0005	19,225	0.000003%
Diesel (Gallons)			
Off-Site	36,902	136,186,585	0.03%
On-Site	13,039	136,186,585	0.01%
Total	49,941	136,186,585	0.04%
Gasoline (Gallons)			
Off-Site	7,362	1,068,836,093	0.0007%

[1] The County's most recent total electricity data in 2024. Source: California Energy Commission. (2025).: https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-0. Accessed September 8, 2025.
[2] The County's anticipated fuel usage in 2027 (the first construction year). Source: California Air Resources Board. (2022). *EMFAC2021, Emissions Inventory.* Retrieved from: https://arb.ca.gov/emfac/emissions-inventory/cd60f29daaedd924a75a9316202d7f56a9b573e5. Accessed September 8, 2025.
GWh = gigawatt-hours
Refer to **Appendix C** for the energy calculations.

The energy sources are described in further detail below.

- **Water Electricity.** Electricity usage associated with water usage for construction dust control is calculated based on the total gallons of water used during soil disturbing activities and the energy intensity. The total gallons of water used is calculated based on the acreage disturbed during grading and site preparation and the daily watering rate per acre disturbed. The total acres disturbed are calculated using the methodology described in *Chapter 4.2 of Appendix C of the CalEEMod User's Guide*. The water application rate of 3,020 gallons per acre per day is from the *Air and Waste Management Association's Air Pollution Engineering Manual* (1992). The energy intensity value is based on the CalEEMod default supply, distribution, and treatment energy intensity per gallon of water for the South Coast Hydrologic Region.
- **Off-site Diesel Construction Trips.** The diesel fuel associated with on-road construction mobile trips is calculated based on VMT from vendor and hauling vehicle trips, the CalEEMod default diesel fleet percentage, and vehicle fuel efficiency in miles per gallon (MPG). VMT for the entire construction period is calculated based on the number of trips multiplied by the trip lengths for each phase shown in CalEEMod. Construction fuel was calculated based on CalEEMod emissions outputs and conversion ratios from the Climate Registry.
- **On-Site Diesel Construction Equipment.** Similarly, the construction diesel fuel associated with the off-road construction equipment is calculated based on CalEEMod emissions outputs and conversion ratios from the Climate Registry.
- **Off-Site Gasoline Construction Trips.** The gasoline fuel associated with on-road construction mobile trips is calculated based on VMT from worker vehicle trips, the CalEEMod default gasoline fleet percentage, and vehicle fuel efficiency in.

As shown in **Table 18**, the total electricity demand associated with Project construction would be approximately 0.0005 GWh and would represent less than 0.01 percent of the electricity usage in the County in 2024. SCE's total energy sales are projected to be 99,361 GWh of electricity in 2027

(the first year of Project construction).[35] The Project construction electricity consumption of 0.0005 GWh would represent less than 0.01 percent of SCE's projected sales. Therefore, it is anticipated that SCE's existing and planned electricity capacity and electricity supplies would be sufficient to serve the Project's temporary construction electricity demand.

As indicated in **Table 18**, Project construction is anticipated to consume approximately 49,941 gallons of diesel and approximately 7,362 gallons of gasoline. The County's annual gasoline fuel use in 2027 is anticipated to be approximately 136,186,585 gallons of diesel and 1,068,836,093 gallons of gasoline.[36] As such, the Project construction diesel use would represent approximately 0.04 percent of the annual diesel used in the County and the Project construction gasoline use would represent less than 0.01 percent of the annual gasoline used in the County. Based on the total Project's relatively low construction fuel use proportional to annual County use, the Project would not substantially affect existing energy fuel supplies or resources. Additionally, the use of construction fuel would be temporary and would cease once the Project is fully developed.

New capacity or additional sources of construction fuel are not anticipated to be required. Transportation fuels (gasoline and diesel) are produced from crude oil, which can be domestic or imported from various regions around the world. Based on current proven reserves, current crude oil production would be sufficient to meet demand through 2050.[37] As such, it is expected that existing and planned transportation fuel supplies would be sufficient to serve the Project's temporary construction demand and Project construction would have a nominal effect on the local and regional energy supplies.

There are no unusual characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in the region or State. Due to increasing transportation costs and fuel prices, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary use of energy during construction. Additionally, the Project would comply with CARB requirements which limits construction equipment idling to five minutes or less. This requirement indirectly relates to construction energy conservation because when air pollutant emissions are reduced through monitoring and the efficient use of equipment and materials, energy use is reduced. Furthermore, Project compliance with the latest U.S. EPA and CARB engine efficiency emissions standards would minimize unnecessary fuel use.

Substantial reduction in energy inputs for construction materials can be achieved by selecting building materials composed of recycled materials that require substantially less energy to produce than non-recycled materials. The project-related incremental increase in the use of energy bound in construction materials such as asphalt, steel, concrete, pipes, and manufactured or processed materials (e.g., lumber and gas) would not substantially increase demand for energy compared to overall local and regional demand for construction materials. It is reasonable to assume that production of building materials such as concrete, steel, etc., would employ all reasonable energy

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35 California Energy Commission. *(2023). CEDU 2022 Baseline Forecast- SCE, Form 1.1.b: Electricity Sales by Sector.* https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2022-integrated-energy-policy-report-update-2. Accessed September 8, 2025.

36 California Air Resources Board. (2022). *EMFAC2021, Emissions Inventory*. https://arb.ca.gov/emfac/emissions-inventory/cd60f29daaedd924a75a9316202d7f56a9b573e5. Accessed September 8, 2025.

37 US Energy Information Administration. (2025). *California State Energy Consumption Profile*. https://www.eia.gov/state/print.php?sid=CA. Accessed September 8, 2025.

conservation practices in the interest of minimizing the costs of business. As stated above, Project construction would not result in inefficient, wasteful, or unnecessary energy consumption and impacts are less than significant.

Less Than Significant Impact: Operational Energy. The energy consumption associated with Project operations would occur from building energy, water use, and transportation fuel use. The proposed Project would not connect to or utilize natural gas. Project operational energy consumption is summarized in **Table 19: Project Operational Energy Consumption**. It should be noted that **Table 19** conservatively does not take credit for energy consumption occurring under existing conditions. For example, the Project would result in a net reduction of 422 total daily vehicle trips when compared to existing conditions; refer to Table 1 in **Appendix L**. Therefore, the Project's energy consumption presented in the table is conservative and would be substantially lower when accounting for existing conditions.

Table 19: Project Operational Energy Consumption

Source	Project Operational Energy	Orange County Annual Energy[1, 2]	Percentage Increase Countywide
Electricity (GWh)			
Building	0.721	19,225	0.004%
Water	0.171	19,225	0.0009%
Solar	*-0.062*	*19,225*	*0.0003%*
Total	0.830	19,225	0.004%
Diesel (Gallons)			
Mobile	99,967	135,357,141	0.07%
Gasoline (Gallons)			
Mobile	24,112	1,048,783,959	0.002%

[1] The County's most recent total electricity data in 2024. Source: California Energy Commission. (2025).: https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-0. Accessed September 8, 2025.
[2] The County's anticipated fuel usage in 2028 (the first operational year). Source: California Air Resources Board. (2022). *EMFAC2021, Emissions Inventory.* Retrieved from: https://arb.ca.gov/emfac/emissions-inventory/cd60f29daaedd924a75a9316202d7f56a9b573e5. Accessed September 8, 2025.
GWh = gigawatt-hours
Refer to **Appendix C** for the energy calculations.

The energy sources are described in further detail below.

- **Building Electricity:** The electricity use from the Project is based on CalEEMod defaults and land use activity data.
- **Water Electricity:** The electricity associated with indoor and outdoor Project operational water usage is quantified using the annual water usage and energy intensity factor. The annual water usage is based on CalEEMod defaults and land use activity data. The indoor energy intensity value is based on the CalEEMod default supply, distribution, treatment, and wastewater energy intensity per gallon of water for the South Coast Hydrologic Region. The outdoor energy intensity value is based on the CalEEMod default supply, distribution, and treatment energy intensity per gallon of water for the South Coast Hydrologic Region.
- **Solar Panels:** The electricity provided by on-site solar panels was quantified based on the system size and the yearly average sun exposure. The solar panels are assumed to have an

hourly capacity of 34.1 kW. The average sun exposure is assumed to be 1,825 hours per year based on five daily peak hours per day, 365 days per week; refer to **Appendix A**.

- **Diesel Truck and Gasoline Passenger Vehicle Trips:** The gasoline and diesel fuel associated with on-road vehicular trips is calculated based on the fleet mix and total VMT from CalEEMod and average fuel efficiency from the Department of Transportation. The total VMT is based on the daily Project trip generation and daily trip lengths. According to Table 1 in **Appendix L**, the Project would generate approximately 146 passenger vehicles and 66 truck vehicles. As addressed in *Section 4.3, Air Quality* above, the truck fleet mix and daily trip lengths were adjusted in CalEEMod to better represent warehouse-specific operations. The passenger vehicle fleet mix is based on CalEEMod defaults.

Table 19 shows the Project's annual operational electrical demand would total approximately 0.830 GWh per year, considering a reduction of 0.062 GWh provided by the on-site solar panels. SCE'S forecasted sales in 2028 (the first operational year) is 100,400 GWh.[38] The proposed Project would represent less than 0.01 percent of SCE's projected sales. SCE would review the Project's estimated electricity consumption to ensure that the estimated power requirement would be part of the total load growth forecast for their service area and accounted for in the planned growth of the power system. Based on these factors, it is anticipated that SCE's existing and planned electricity capacity and supply would be sufficient to serve the Project's electricity demand. Furthermore, the Project design and operations would be subject to compliance with the latest CALGreen Code and Title 24 Standards.

As shown in **Table 19**, the Project is anticipated to consume 101,005 gallons of diesel and 34,716 gallons of gasoline. The County's annual diesel and gasoline fuel use in 2028 is anticipated to be 135,357,141 gallons and 1,048,783,959 gallons, respectively. The Project's operational diesel and gasoline use would represent approximately 0.07 percent of diesel use and approximately 0.003 percent of gasoline use in the County. Therefore, the proposed Project would not result in a substantial demand for energy that would require expanded supplies or the construction of other infrastructure or expansion of existing facilities. Transportation fuels (gasoline and diesel) are produced from crude oil, which can be domestic or imported from various regions around the world. Based on current proven reserves, the global supply of crude oil, other liquid hydrocarbons, and biofuels is expected to be adequate to meet the world's demand for liquid fuels through 2050.[39]

Project operations would not substantially affect existing energy or fuel supplies or resources. Furthermore, the Project would comply with applicable energy standards and new capacity would not be required. As such, Project operations would not result in inefficient, wasteful, or unnecessary energy consumption and impacts are less than significant.

b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. As concluded above, the Project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources.

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38 California Energy Commission. (2023). CEDU 2022 Baseline Forecast – SCE. https://www.energy.ca.gov/data-reports/reports/2022-integrated-energy-policy-report-update/2022-iepr-workshops-notices-and-2. Accessed September 11, 2025.

39 US Energy Information Administration. (2025). *California State Energy Consumption Profile*. https://www.eia.gov/state/print.php?sid=CA. Accessed September 8, 2025.

Buildings adhering to the latest Title 24 Standards and CALGreen Code would be more energy efficient than buildings designed with the prior code. Project design and operations would comply with the 2025 Title 24 Standards, 2025 CALGreen Code, and applicable energy regulations. As such, the proposed warehouse would be more energy efficient than the existing on-site uses. According to Table 1 in **Appendix L**, Project implementation would result in a net reduction of 422 total daily trips when compared to existing conditions. Therefore, the transportation fuel consumption would be reduced by Project implementation. Although the City has not adopted any specific plans that address energy efficiency, the City of Fullerton Climate Action Plan (CAP, adopted in 2012) establishes energy and water conservation strategies to reduce citywide GHG emissions. Therefore, compliance with the CAP strategies would further result in energy conservation and efficiency. As such, the Project would not conflict with applicable plans for renewable energy or energy efficiency.

The Project would receive electricity from SCE, which is subject to the RPS. The RPS requires investor-owned utilities, electric service providers, and community choice aggregators to increase total procurement from eligible renewable energy resources to 33 percent by 2020 and 50 percent by 2030. As noted above, SB 100 revised the goal of the program to achieve the 50 percent renewable resources target by December 31, 2026, and to achieve a 60 percent target by December 31, 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045. Renewable energy is generally defined as energy that comes from resources which are naturally replenished within a human timescale, such as sunlight, wind, tides, waves, and geothermal heat. The SCE satisfies its renewable energy portfolio standards and consists of approximately 37.6 percent of renewable energy sources.[40]

The Project would not otherwise conflict with or obstruct compliance with plans for renewable energy. As such, the Project would be designed to meet all applicable State building energy efficiency standards as well as the City's energy efficiency standards. Therefore, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency and impacts would be less than significant.

[40] South California Edison. (N.D.). *2023 Power Content Label, Southern California Edison Company.* Retrieved from: *https://www.energy.ca.gov/filebrowser/download/7362*. Accessed September 8, 2025.

4.7 GEOLOGY AND SOILS

ENVIRONMENTAL IMPACTS	Potentially Significant Issues	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
7. GEOLOGY AND SOILS. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				X
ii) Strong seismic ground shaking?		X		
iii) Seismic-related ground failure, including liquefaction?			X	
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?			X	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?		X		
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			X	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		X		

NorCal Engineering, Inc. prepared a *Geotechnical Engineering Investigation* (Geotechnical Investigation) for the proposed Project. The report is included in this Initial Study as **Appendix D: Geotechnical Engineering Investigation** and is summarized below.

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

No Impact. Alquist-Priolo Earthquake Fault Zones are regulatory zones surrounding active faults located within California that were created through the Alquist-Priolo Earthquake Fault Zoning Act. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (typically 50 feet). The project site is not located within an Alquist-Priolo Earthquake Fault Zone as designated by the California Geological Survey. The nearest Alquist-Priolo fault zone is approximately 5 miles to the northeast of the project site.[41] Therefore, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death due to direct fault rupture. No impact would occur.

ii) Strong seismic ground shaking?

Less Than Significant with Mitigation Incorporated. The City of Fullerton, similar to the rest of California, is located within a seismically active region as a result of being located near the active margin between the North American and Pacific tectonic plates. The local and regional faults that have the potential to affect the City are depicted in The Fullerton Plan Final Program EIR, Exhibit 5.7-1, Regional Faults, and described in Table 5.7-1, Descriptions of Regional Faults. The two faults that traverse Fullerton are the Norwalk Fault and Puente Hills Fault. As previously noted, the project site is not within a designated Alquist-Priolo Earthquake Fault Zone. The fault nearest to the project site is the El Modeno Fault, which is located approximately 1.8 miles to the southeast and is capable of producing a magnitude 6.8 earthquake.

Due to the numerous faults in the region, rupture of any of these faults or of an unknown fault in the region could cause seismic ground shaking at the project site. The intensity of ground shaking on the project site would depend on the earthquake's magnitude, distance to the epicenter, and geology of the area between the project site and the epicenter. Therefore, Project implementation could expose people and structures to potential adverse effects involving strong seismic ground shaking if not constructed in alignment with the regulatory framework identified below.

State laws and local ordinances require that, prior to construction, potential seismic hazards be identified and mitigated, as needed, to protect public health and safety from substantial risks through appropriate engineering practices. Project construction would be required to conform to CBC and California Health and Safety Code seismic design requirements (or applicable adopted code at the time of plan submittal or grading and building permit issuance for construction). The building and safety standards established by these codes have been developed to address structural integrity during a seismic event. Chapter 14.03 – Building Code of the FMC adopts the 2022 California Building Code (CBC), which outlines requirements and structural standards for

[41] Department of Conservation California Geological Survey. (N.D.). California Earthquake Hazards Zone Application. Retrieved from: https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/. Accessed July 11, 2025.

building in the City including design requirements to mitigate the effects of potential earthquake hazards.

The Geotechnical Investigation prepared for the Project evaluated various geologic and seismic hazards based on site-specific parameters, including a seismicity evaluation, and provides recommendations concerning seismic design parameters, foundations, slabs, and general earthwork and grading, among others (see **Appendix D**). The Project would comply with SC GEO-2, which would ensure the City would review all Project plans and all other relevant construction permits to verify compliance with the Geotechnical Engineering Investigation (NorCal Engineering, Inc., 2023) recommendations and other applicable Code requirements. With the implementation of SC GEO-2 and considering the Project would comply with applicable seismic design requirements, impacts associated with strong seismic ground shaking would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a phenomenon where earthquake-induced ground vibrations increase the pore pressure in saturated, granular soils until it is equal to the confining, overburden pressure. When this occurs, the soil can completely lose its shear strength and enter a liquefied state. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures. The project site is not situated in an area of historic occurrence of liquefaction, within a CGS Liquefaction Zone, or local geological, geotechnical and groundwater conditions to indicate a potential for permanent ground displacement (**Appendix D**). Therefore, the Project would not cause potential substantial adverse effects involving liquefaction. Impacts would be less than significant with mitigation.

iv) Landslides?

No Impact. Landslides can occur if ground shaking and/or heavy rainfall disturb areas of steep slopes consisting of unstable soils. As concluded in the Geotechnical Investigation, due to the relatively flat topography descending gradually from north to south, the site is not within a zone of possible earthquake-induced landslides. Additionally, the California Geological Survey's Landslide Inventory reports the project site is not within a landslide hazard zone.[42] Therefore, the proposed Project would not directly or indirectly cause potential substantial adverse effects, including the risks of loss or death, involving landslides, and no impact would occur.

b) Result in substantial soil erosion or the loss of topsoil?

Less than Significant Impact. Geotechnical Investigation indicated that the project site is relatively flat and is composed of fine to medium grained, silty sand with occasional gravel at a depth ranging from 1 to 1.5 feet below ground surface (bgs). An undisturbed natural soil classified as light brown, fine to medium grained, silty to slightly silty sand was encountered beneath the fill soils. Grading and earthwork activities during construction would expose soils to potential short-term erosion by wind and water. During construction, the proposed Project would be subject to compliance with erosion and siltation control measures and the National Pollutant Discharge Elimination System

[42] California Department of Conservation. (2024). *Landslide Inventory (Beta)*. https://maps.conservation.ca.gov/cgs/lsi/app/, Accessed July 11, 2025.

(NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2013-0001-DWQ, and all subsequent amendments) (Construction General Permit). The NPDES permit requires development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) and monitoring plan, which must include erosion-control and sediment-control Best Management Practices (BMPs) that would meet or exceed measures required by the Construction General Permit to control potential construction-related pollutants. Erosion-control BMPs are designed to prevent erosion, whereas sediment controls are designed to trap sediment once it has been mobilized. Following compliance with NPDES and the Project would not result in substantial soil erosion or the loss of topsoil. Impacts are less than significant and no mitigation is required.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less Than Significant with Mitigation Incorporated.

Landslides. As noted in Threshold a)iv) above, the project site is not subject to landslides due to location and topography. In addition, the project site is not located in a zone identified as being susceptible to landslides by the California Geological Survey's Landslide Inventory. Therefore, given no landslides would occur due to project site and area location and topography, there would be no impact as a result of landslides and no mitigation is required.

Lateral Spreading. Lateral spreading is the finite, horizontal movement of material associated with pore pressure build-up or liquefaction. This process can occur in a shallow underlying deposit during an earthquake in areas susceptible to liquefaction. To occur, lateral spreading requires the existence of a continuous and laterally unconstrained liquefiable zone. Given the very low probability of liquefaction, impacts from lateral spreading would be less than significant and no mitigation is required.

Subsidence. Soil subsidence is characterized by sinking or descending soils that occur as the result of a heavy load being placed on underlying sediments and may be triggered by seismic events. Seismically-induced settlement depends on the relative subsurface soil density. Settlements from collapsible soils can be relatively large and damaging to improvements. The Geotechnical Investigation determined on-site soils to consistent of fill and natural soil both generally classified as fine to medium grained silty sand and observed to be medium dense. As recommended in the Geotechnical Investigation all disturbed soil or fill shall be removed, and approved import soils would be placed and compacted as outlined in the report to comply with applicable standards to avoid instability due to subsidence. Compliance with SC GEO-2, would ensure the City would review all Project plans and all other relevant construction permits to verify compliance with the Geotechnical Engineering Investigation (NorCal Engineering, Inc., 2023) recommendations. Therefore, in this regard, the Project would have a less than significant impact with mitigation incorporated.

Liquefaction or collapse. As noted above in Threshold a)iii) the project site is not situated in an area of historic occurrence of liquefaction, within a CGS Liquefaction Zone, or local geological, geotechnical and groundwater conditions to indicate a potential for permanent ground

displacement. Therefore, the Project would not cause potential substantial adverse effects involving liquefaction. Impacts would be less than significant with mitigation.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant. Soils that expand and contract in volume ("shrink-swell" pattern) are considered to be expansive and may cause damage to aboveground infrastructure as a result of density changes that shift overlying materials. Fine-grain silts and clay sediments are most likely to exhibit shrink-swell patterns in response to changing moisture levels. As outlined in the Geotechnical Investigation, testing of the upper soils indicated an expansion index of 0, classifying the on-site expansion potential as very low. Therefore, impacts from expansive soils would be less than significant and no mitigation is required.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. There is existing sewer infrastructure in the vicinity of the project site that is available to serve the proposed Project. The Project would connect to the existing sanitary sewer system for wastewater disposal and would not include the use of septic tanks. Therefore, the proposed Project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. No impact would occur.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than Significant Impact With Mitigation Incorporated. Paleontological resources are found in geological deposits of sedimentary rock (i.e., sandstone, siltstone, mudstone, claystone, or shale). The potential for the occurrence of a unique geologic feature depends on the rock type exposed at the surface in a given area and potential effects on paleontological resources would primarily be associated with ground-disturbing activities. A paleontological resources records search was requested from the Western Science Center in July 2025; see **Appendix E.** The records search identified Quaternary alluvial units on the project site that are considered to be fossiliferous and highly paleontologically sensitive. The Western Science Center record search indicates that no paleontological resources have been discovered within the project site or a one-mile radius; however, Quaternary alluvial units throughout Southern California have produced large quantities of fossils. Therefore, MM GEO-1 is required to reduce the Project's potential impacts to a less than significant level. MM GEO-1 details the appropriate steps should paleontological resources be encountered during ground-disturbing activities. If paleontological resources are inadvertently unearthed during excavation and grading activities, all earth-disturbing activities within a 100-foot radius of the area of discovery would cease. Additionally, the Applicant would have to retain a qualified professional paleontologist to evaluate the significance of the finding and create an appropriate course of action. Following compliance with MM GEO-1, the Project's potential impacts to a unique paleontological resource/site or geologic feature would be less than significant.

Standard Conditions and Requirements

SC GEO-1 Project plans and designs shall comply with Fullerton Municipal Code Chapter 14.03 – Building Code, which incorporates the 2022 California Building Standards Code which contains all regulations for how buildings are designed and constructed, and are intended to ensure the maximum structural integrity and safety of private and public buildings.

SC GEO-2 Prior to Grading Permit issuance, the City shall review all Project plans and all other relevant construction permits to verify compliance with the Geotechnical Engineering Investigation (NorCal Engineering, Inc. 2023) recommendations and other applicable Code requirements.

Mitigation Measures

MM GEO-1 **Paleontological Resources.** In the event that paleontological resources are inadvertently unearthed during excavation and grading activities, the contractor shall immediately cease all earth-disturbing activities within a 100-foot radius of the area of discovery. The Applicant shall retain a qualified professional paleontologist subject to approval by the City of Fullerton, to evaluate the significance of the finding and appropriate course of action. If avoidance of the resource(s) is not feasible, the Applicant shall follow salvage operation requirements pursuant to State CEQA Guidelines Section 15064.5. After the Applicant has appropriately avoided or mitigated the find, work in the area may resume.

4.8 GREENHOUSE GAS EMISSIONS

ENVIRONMENTAL IMPACTS	Potentially Significant Issues	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
8. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	

The greenhouse gas (GHG) modeling outputs and results are included in **Appendix A: Air Quality and Greenhouse Gas Emissions Data** and summarized below.

Background

The "greenhouse effect" is the natural process that retains heat in the troposphere, the bottom layer of the atmosphere. Without the greenhouse effect, thermal energy would "leak" into space, resulting in a much colder and inhospitable planet. With the greenhouse effect, the global average temperature is approximately 61˚F (16˚C). GHGs are the components of the atmosphere responsible for the greenhouse effect. The amount of heat retained is proportional to the concentration of GHGs in the atmosphere. As human activities and natural sources release more GHGs into the atmosphere, GHG concentrations increase, and the atmosphere retains more heat, increasing the effects of climate change. The Kyoto Protocol identified six gases for emission reduction targets: carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFC), perfluorocarbons (PFC), and sulfur hexafluoride (SF_6). When accounting for GHGs, all types of GHG emissions are expressed in terms of CO_2 equivalents (CO_2e) and are typically quantified in metric tons (MT) or million metric tons (MMT).

CO_2, CH_4, and N_2O cause approximately 80 percent of the total heat stored in the atmosphere. Human activities, as well as natural sources, emit these three gases. Each of the GHGs affects climate change at different rates and persists in the atmosphere for varying lengths of time. The GWP is the relative measure of the potential for a GHG to trap heat in the atmosphere. The GWP allows comparisons of the global warming impacts of different gases. Specifically, it is a measure of how much energy the emissions of one ton of a gas will absorb over a given period, relative to the emissions of one ton of CO_2. The larger the GWP, the more that a given gas warms the Earth compared to CO_2 over that period. GWPs provide a common unit of measure, which allows analysts to add up emissions estimates of different gases (e.g., to compile a national GHG inventory) and allows policymakers to compare emissions reduction opportunities across sectors and gases.

Stationary source combustion of natural gas in equipment such as water heaters, boilers, process heaters, and furnaces emits GHGs, primarily CO_2, CH_4, and N_2O. GHGs are also emitted from mobile sources such as on-road vehicles and off-road construction equipment burning fuels such as gasoline, diesel, biodiesel, propane, or natural gas (compressed or liquefied). Indirect GHG emissions result from electric power

generated elsewhere (i.e., power plants) used to operate process equipment, lighting, and utilities at a facility. Included in GHG quantification is electric power, which is used to pump the water supply (e.g., aqueducts, wells, pipelines) and the disposal and decomposition of municipal waste in landfills.[43]

Regulations

Energy Independence and Security Act of 2007

The EISA of 2007, among other key measures, requires the following, which would aid in the reduction of national GHG emissions:

- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
- Set a target of 35 mpg or the combined fleet of cars and light trucks by model year 2020 and direct the National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.
- Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

On April 9, 2025, President Trump signed an executive order calling for the sunset of various environmental regulations. The order affects pieces of several keystone energy and environmental legislation, including the EISA of 2007.

United States Environmental Protection Agency Endangerment Finding

The U.S. EPA authority to regulate GHG emissions stems from the United States Supreme Court decision in *Massachusetts v. EPA* (2007). The Supreme Court ruled that GHGs meet the definition of air pollutants under the existing FCAA and must be regulated if these gases could be reasonably anticipated to endanger public health or welfare. Responding to the Court's ruling, the U.S. EPA finalized an endangerment finding in December 2009. Based on scientific evidence it found that six GHGs (CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6) constitute a threat to public health and welfare. Therefore, it is the Supreme Court's interpretation of the existing FCAA and the U.S. EPA's assessment of the scientific evidence that form the basis for the U.S. EPA's regulatory actions.

In response to President Trump's "Unleashing American Energy" Executive Order, published on January 20, 2025, the U.S. EPA announced its intention to reconsider regulations and actions that rely on the 2009 Greenhouse Gas Endangerment Finding (Endangerment Finding) on March 12, 2025. The March 12 announcement specifically targets the following which impact GHG emissions:

- Advanced Clean Trucks Plan, including:
  - Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards
  - Multi-Pollutant Emissions Standards for Model Year 2027 and Later Light- and Medium-Duty Vehicles
  - GHG Emissions Standards for Heavy-Duty Vehicles – Phase 3.
- Corporate Average Fuel Economy (CAFE) Standards

[43] California Air Resources Board. (2008). *Climate Change Scoping Plan*.

Federal Vehicle Standards

In response to the United States Supreme Court ruling discussed above, Executive Order 13432 was issued in 2007 directing the U.S. EPA, the Department of Transportation, and the Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2009, the NHTSA issued a final rule regulating fuel efficiency and GHG emissions from cars and light-duty trucks for model year 2011, and in 2010, the U.S. EPA and NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012 to 2016.

In 2010, an Executive Memorandum was issued directing the Department of Transportation, Department of Energy, U.S. EPA, and NHTSA to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the U.S. EPA and NHTSA proposed stringent, coordinated federal GHG and fuel economy standards for model years 2017 to 2025 light-duty vehicles. The proposed standards projected to achieve 163 grams per mile of CO_2 in model year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 mpg if this level were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017–2021, and NHTSA intends to set standards for model years 2022–2025 in a future rulemaking. On January 12, 2017, the U.S. EPA finalized its decision to maintain the current GHG emissions standards for model years 2022–2025 cars and light trucks.

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011, the U.S. EPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018. The standards for CO_2 emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the U.S. EPA, this regulatory program will reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baselines.

In August 2016, the U.S. EPA and NHTSA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program applies to vehicles with model year 2018–2027 for certain trailers, and model years 2021–2027 for semi-trucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. The final standards lower CO_2 emissions by approximately 1.1 billion metric tons and reduce oil consumption by up to two billion barrels over the lifetime of the vehicles sold under the program.

On September 27, 2019, the U.S. EPA and the NHTSA published the "Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program" (84 Federal Regulation 51,310 (Sept. 27, 2019). The SAFE Rule (Part One) revoked California's authority to set its own GHG emissions standards and set zero-emission vehicle mandates in California. On March 31, 2020, the U.S. EPA and NHTSA finalized rulemaking for SAFE Part Two, which sets CO_2 emissions standards and CAFE standards for passenger vehicles and light duty trucks, covering model years 2021-2026. The current U.S. EPA administration repealed SAFE Rule Part One, effective January 28, 2022, and is reconsidering Part Two.

On June 7, 2024, the NHTSA finalized their CAFE standards for model year 2030 to 2035. The final rule requires an industry-wide fuel average of approximately 50.4 mpg for passenger cars and light-duty trucks and an industry fleet-wide average for heavy-duty pickup trucks and vans of roughly 2.851 gallons per 100 miles.

In response to President Trump's "Unleashing American Energy" Executive Order, published on January 20, 2025, the U.S. EPA announced its intention to reconsider regulations and actions that rely on the Endangerment Finding on March 12, 2025. This includes the CAFE standards. On June 6, 2025, the NHTSA published an interpretive rule that establishes the NHTSA's authority to revise the CAFE standards without consideration of electric vehicles. Implementation of these standards remains uncertain.

California Air Resources Board

CARB is responsible for the coordination and oversight of State and local air pollution control programs in California. Various statewide and local initiatives to reduce California's contribution to GHG emissions have raised awareness about climate change and its potential for severe long-term adverse environmental, social, and economic effects. California is a significant emitter of CO_2e in the world and produced 371.1gross $MMTCO2_e$ in 2022.[44] In California, the transportation sector is the largest emitter of GHGs, followed by industrial operations such as manufacturing and oil and gas extraction.

The State legislature has enacted a series of bills that constitute the most aggressive program to reduce GHGs of any state in the nation. Some legislation, such as the landmark AB 32, *California Global Warming Solutions Act of 2006*, was specifically enacted to address GHG emissions. Other legislation, such as Title 24 Building Energy Efficiency Standards and Title 20 Appliance Energy Standards, were originally adopted for other purposes such as energy and water conservation but also provide GHG reductions.

Assembly Bill 32

Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006, instructed CARB to develop and enforce regulations for the reporting and verification of statewide GHG emissions and established a State goal of reducing GHG emissions to 1990 levels by the year 2020. AB 32 additionally established a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner. The Scoping Plan was first approved by CARB in 2008 and is updated every five years.

California Air Resources Board Scoping Plan

Adopted December 15, 2022, CARB's 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB 1279. To achieve the targets of AB 1279, the 2022 Scoping Plan relies on existing and emerging fossil fuel alternatives and clean technologies, as well as carbon capture and storage. Specifically, the 2022 Scoping Plan focuses on zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high GWP; providing communities with sustainable options for walking, biking, and public transit; displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines); and scaling up new options such as green hydrogen. The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (i.e., CAP) consistent with CEQA Guidelines Section 15183.5.

The key elements of the 2022 CARB Scoping Plan focus on transportation. Specifically, the 2022 Scoping Plan aims to rapidly move towards zero-emission transportation (i.e., electrifying cars, buses, trains, and

[44] California Air Resources Board. (2024). *Current California GHG Emissions Inventory Data.* Retrieved from: https://ww2.arb.ca.gov/ghg-inventory-data. Accessed September 11, 2025.

trucks), which constitutes California's single largest source of GHGs. The regulations that impact the transportation sector are adopted and enforced by CARB on vehicle manufacturers and are outside the jurisdiction and control of local governments. The 2022 Scoping Plan accelerates development of new regulations as well as amendments to strengthen regulations and programs already in place.

Included in the 2022 Scoping Plan is a set of Local Actions (2022 Scoping Plan Appendix D) aimed at providing local jurisdictions with tools to reduce GHGs and assist the State in meeting the ambitious targets set forth in the 2022 Scoping Plan. Appendix D to the 2022 Scoping Plan includes a section on evaluating plan-level and project-level alignment with the State's Climate Goals in CEQA GHG analyses. In this section, CARB identifies several recommendations and strategies that should be considered for new development in order to determine consistency with the 2022 Scoping Plan. Notably, this section is focused on Residential and Mixed-Use projects.[45] CARB specifically states that Appendix D does not address other land uses (e.g., industrial) as contemplated by the Project.[46] However, CARB plans to explore new approaches for other land use types in the future.[47] As such, it would be inappropriate to apply the requirements contained in Appendix D of the 2022 Scoping Plan to any land use types other than residential or mixed-use residential development.

Senate Bill 32 (California Global Warming Solutions Act of 2006: Emissions Limit)

Signed into law in September 2016, SB 32 codifies the 2030 GHG reduction target in Executive Order B-30-15 (40 percent below 1990 levels by 2030). The bill authorizes CARB to adopt an interim GHG emissions level target to be achieved by 2030. CARB also must adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions.

SB 100 and SB 1020 (California Renewables Portfolio Standard Program: Emissions of Greenhouse Gases)

Signed into law in September 2018, SB 100 increased California's renewable electricity portfolio from 50 to 60 percent by 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045. SB 1020 provides additional goals for the path to the 2045 goal of 100 percent clean electricity retail sales. It creates a target of 90 percent clean electricity retail sales by 2035 and 95 percent clean electricity retail sales by 2040.

AB 1279 (The California Climate Crisis Act)

AB 1279 establishes the policy of the State to achieve carbon neutrality as soon as possible, but no later than 2045; to maintain net negative GHG emissions thereafter; and to ensure that by 2045 statewide anthropogenic GHG emissions are reduced at least 85 percent below 1990 levels. The bill requires CARB to ensure that Scoping Plan updates identify and recommend measures to achieve carbon neutrality, and to identify and implement policies and strategies that enable CO_2 removal solutions and carbon capture, utilization, and storage technologies.

Title 20 Appliance Efficiency Regulations

The appliance efficiency regulations (CCR Title 20, Sections 1601-1608) include standards for new appliances. Twenty-three categories of appliances are included in the scope of these regulations. These

[45] California Air Resources Board. (2022). *2022 Scoping Plan for Achieving Carbon Neutrality, Appendix D: Local Actions, Page 21*
[46] Ibid.
[47] Ibid.

standards include minimum levels of operating efficiency, and other cost-effective measures, to promote the use of energy- and water-efficient appliances.

Title 24 Building Energy Efficiency Standards

California's Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR Title 24, Part 6) was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions.

In December 2024, the 2025 Title 24 Energy Code was approved by the California Building Standards Commission for inclusion into the California Building Standards Code. The 2025 Title 24 Energy Code encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2026, must comply with the 2025 Title 24 Energy Code.

Title 24 California Green Building Standards Code

The California Green Building Standards Code (CCR Title 24, Part 11 code) commonly referred to as the CALGreen Code, is a statewide mandatory construction code developed and adopted by the California Building Standards Commission and the Department of Housing and Community Development. The CALGreen Code requires new residential and commercial buildings to comply with mandatory measures under the topics of planning and design, energy efficiency, water efficiency/conservation, material conservation and resource efficiency, and environmental quality. The CALGreen Code also provides voluntary tiers and measures that local governments may adopt that encourage or require additional measures in the five green building topics: planning and design; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality. The CALGreen Code also provides voluntary tiers and measures that local governments may adopt that encourage or require additional measures in the five green building topics. The most recent update to the CALGreen Code was adopted in December 2024 (2025 CALGreen Code) and continues to improve upon the existing standards for new construction of, and additions and alterations to, residential and non-residential buildings. Buildings whose permit applications are applied for on or after January 1, 2026, must comply with the 2025 CALGreen Code.

South Coast Air Quality Management District

The SCAQMD is the air pollution control agency for Orange County and the urban portions of Los Angeles, Riverside, and San Bernardino counties. The agency's primary responsibility is to ensure that CAAQS and NAAQS are attained and maintained in the SCAB. The SCAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, conducting public education campaigns, and many other activities. All projects are subject to applicable SCAQMD rules and regulations in effect at the time of construction and operation. The following are SCAQMD rules relevant to GHG:

- Rule 1415 (Reduction of Refrigerant Emissions from Stationary Air Conditioning Systems) – The purpose of this rule is to reduce emissions of high-GWP refrigerants from stationary air conditioning systems by requiring projects to reclaim, recover, or recycle refrigerant and minimize leakage.
- Rule 2305 (WAIRE Program) – The purpose of this rule is to reduce NO_X and particulate matter emissions associated with warehouses and mobile sources attracted to warehouses. Rule 2305 would also reduce GHG emissions. This rule applies to all existing and proposed warehouses over 100,000 square feet located in the SCAQMD. Rule 2305 requires warehouse operators to track annual VMT associated with truck trips to and from the warehouse. These trip miles are used to calculate a warehouse's WAIRE Points Compliance Obligation. WAIRE Points are earned based on emission reduction measures and warehouse operators are required to submit an annual WAIRE Report which includes truck trip data and emission reduction measures. Reduction strategies listed in the WAIRE menu include acquire ZE or near zero emission NZE trucks; require ZE/NZE truck visits; require ZE yard trucks; install on-site ZE charging/fueling infrastructure; install on-site energy systems; and install filtration systems in residences, schools, and other buildings in the adjacent community. Warehouse operators that do not earn a sufficient number of WAIRE points to satisfy the WAIRE Points Compliance Obligation would be required to pay a mitigation fee. Funds from the mitigation fee will be used to incentivize the purchase of cleaner trucks and charging/fueling infrastructure in communities nearby.

Southern California Association of Governments

The SCAG updates Connect SoCal, the RTP/SCS, every four years. The most recent Connect SoCal (2024-2050 RTP/SCS) is a long-range vision plan for a more resilient and equitable future and contains policies and strategies for achieving the region's shared goals through 2050.[48] The RTP/SCS is a long-range vision plan that balances future mobility and housing needs with economic, environmental, and public health goals so that the region can grow smartly and sustainably. The strategy was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses, and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. The SCAG region must achieve specific federal air quality standards and is required by State law to lower regional GHG emissions. Per SB 375, CARB has set GHG reduction targets at 8 percent below 2005 per capita emissions levels by 2020, and 19 percent below 2005 per capita emissions levels by 2035.

The Fullerton Plan

Adopted on May 1, 2012, Chapter 17: Air Quality and Climate Change of The Fullerton Plan establishes the following applicable goal and policies aimed at reducing GHG emissions:

GOAL 22: Participation in regional efforts to address climate change and its local impacts.

P22.1 **Motor Vehicle-related GHG Emissions** Support regional and subregional efforts to reduce greenhouse gas emissions associated with transportation through land use strategies and policies, transportation system improvements, and transportation demand management programs.

[48] Southern California Association of Governments. (2024). *Connect SoCal (2024 – 2050 Regional Transportation Plan/Sustainable Communities Strategy).*

P22.2 **GHG Emissions from Electrical Generation** Support regional and subregional efforts to reduce greenhouse gas emissions associated with electrical generation through energy conservation strategies and alternative/renewable energy programs.

P22.3 **GHG Emissions from Water Conveyance** Support regional and subregional efforts to reduce greenhouse gas emissions associated with water conveyance through water conservation strategies and alternative supply programs.

P22.4 **Solid Waste-Related GHG Emissions** Support regional and subregional efforts to reduce emissions associated with solid waste through increased recycling programs and reduced waste strategies.

P22.6 **GHG Emissions from Waste** Support projects, programs, policies and regulations to reduce greenhouse gas emissions from waste through improved management of waste handling and reductions in waste generation.

P22.8 **Sustainable Communities Strategies** Support projects, programs, policies and regulations to coordinate future community-based planning eff orts of the Focus Areas for consistency with the SCAG Sustainable Communities Strategy and Orange County Sustainable Communities Strategy.

P22.9 **Development** Support projects which voluntarily desire to implement site and/or building design features exceeding minimum requirements to reduce project greenhouse gas emissions.

City of Fullerton Climate Action Plan

The City of Fullerton CAP provides a framework to reduce GHG emissions to a level consistent with the State reduction targets. The CAP establishes a baseline emissions inventory, future emission projections, and strategies, actions, and measures to meet reduction targets. The CAP includes the following strategies:

- **Transportation and Mobility Strategy.** Promote a balanced transportation system that promotes the use of public transportation and bicycles, reduces congestion, and helps encourage residents to engage in healthy and active lifestyles.
- **Energy Use and Conservation Strategy.** Reduce the carbon footprint of municipal operations to serve as a leader for the community and support the construction of buildings that are energy efficient and incorporate clean, renewable energy sources.
- **Water Use and Efficiency Strategy.** Conserve and protect water resources and promote efficiency through public education.
- **Solid Waste Reduction and Recycling Strategy.** Manage solid waste generation and diversion in order to achieve a zero-waste future.

Thresholds of Significance

South Coast Air Quality Management District

The SCAQMD formed a GHG CEQA Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. This working group was formed to assist SCAQMD's efforts to develop a GHG significance threshold and is composed of a

wide variety of stakeholders including the State Office of Planning and Research, CARB, the Attorney General's Office, a variety of city and county planning departments in the SCAB, various utilities such as sanitation and power companies throughout the SCAB, industry groups, and environmental and professional organizations. The Working Group has proposed a tiered approach to evaluating GHG emissions for development projects where SCAQMD is not the lead agency, wherein projects are evaluated sequentially through a series of "tiers" to determine whether the project is likely to result in a potentially significant impact due to GHG emissions.

With the tiered approach, a project is compared against the requirements of each tier sequentially and would not result in a significant impact if it complies with any tier. Tier 1 excludes projects that are specifically exempt from SB 97 from resulting in a significant impact. Tier 2 excludes projects that are consistent with a GHG reduction plan that has a certified final CEQA document and complies with AB 32 GHG reduction goals. Tier 3 excludes projects with annual emissions lower than a screening threshold. The SCAQMD has adopted a threshold of 10,000 $MTCO_2e$ per year for industrial projects and a 3,000 $MTCO_2e$ threshold was proposed for non-industrial projects but has not been adopted. During Working Group Meeting #7 it was explained that this threshold was derived using a 90 percent capture rate of a large sampling of industrial facilities. During Meeting #8, the Working Group defined industrial uses as production, manufacturing, and fabrication activities or storage and distribution (e.g., warehouse, transfer facility, etc.). The Working Group indicated that the 10,000 $MTCO_2e$ per year threshold applies to both emissions from construction and operational phases plus indirect emissions (electricity, water use, etc.). The SCAQMD concluded that projects with emissions less than the screening threshold would not result in a significant cumulative impact.

Tier 4 consists of three options. Under the Tier 4 first option, SCAQMD initially outlined that a project would be excluded if design features and/or mitigation measures resulted in emissions 30 percent lower than business as usual emissions. However, the Working Group did not provide a recommendation for this approach. The Working Group folded the Tier 4 second option into the third option. Under the Tier 4 third option, a project would be excluded if it was below an efficiency-based threshold of 4.8 $MTCO_2e$ per service population per year. Tier 5 would exclude projects that implement off-site mitigation (GHG reduction projects) or purchase offsets to reduce GHG emission impacts to less than the proposed screening level.

When the tiered approach is applied to a proposed project and the project is found not to comply with Tier 1 or Tier 2, a project's emissions are compared against a screening threshold, as described above, for Tier 3. The screening threshold formally adopted by SCAQMD is an "interim" screening threshold for stationary source industrial projects where the SCAQMD is the lead agency under CEQA. The threshold was termed "interim" because the SCAQMD anticipated that CARB would adopt a statewide significance threshold that would inform and provide guidance to SCAQMD in its adoption of a final threshold. However, no statewide threshold was ever adopted, and the interim threshold remains in effect.

For projects for which SCAQMD is not the lead agency, no screening thresholds have been formally adopted. However, the SCAQMD Working Group recommended a threshold of 10,000 $MTCO_2e$ per year for industrial projects and 3,000 $MTCO_2e$ per year for residential and commercial projects. SCAQMD determined that these thresholds would "capture" 90 percent of GHG emissions from these sectors, "capture" meaning that 90 percent of total emissions from all new projects would be subject to some type

of CEQA analysis (i.e., found potentially significant).[49] For purposes of this analysis, the threshold of significance is conservatively 3,000 $MTCO_2e$ per year.

City of Fullerton Climate Action Plan

The CAP does not include quantitative project-level CEQA thresholds or percentage reduction targets for individual projects. However, the CAP establishes that projects that demonstrate consistency with the emission projections, emission reduction targets, or strategies contained in the CAP would have a less than significant impact on climate change.

Methodology

Project construction would generate emissions from off-road equipment usage and on-road vehicle travel associated with haul, delivery, and construction worker trips. Annual construction emissions are estimated by assuming construction occurs at the earliest feasible date (i.e., a conservative estimate of construction activities) and applying off-road, fugitive dust, and on-road emissions factors in CalEEMod. As recommended by the SCAQMD, the Project construction emissions were amortized over the lifetime of the Project and added to the Project operational emissions.

Project operations would generate emissions from area sources (consumer products, architectural coating, and landscaping equipment), electrical generation, mobile sources (motor vehicles from Project-generated vehicle trips), water supply and wastewater treatment, solid waste generation, water usage, fugitive refrigerants, an emergency fire pump, and off-road forklifts. The mobile source emissions were estimated in CalEEMod based on the Project vehicle trip generation table included in **Appendix L** and prepared by Kimley-Horn as informed by the City's TAPP Analysis. The Project operational emissions associated with area sources, electricity, water and wastewater, and solid waste were quantified in CalEEMod based on land use activity data. The emergency fire pump emissions were calculated using default emissions rates from the U.S. EPA. The off-road forklift emissions were calculated using default emissions rates from CARB. As addressed in **Section 4.6: Energy**, the solar panel is assumed to be a 34.1 kW system and would produce 62.23 MWh per year. The use of solar panels would reduce the Project's consumption of grid electricity and would thus reduce operational electricity GHG emissions. The emissions reduction attributable to the solar panels was calculated based on the annual electricity provided by the solar panels and default electricity intensity factor from the *CalEEMod User Guide*. The total Project emissions were analyzed against the conservative SCAQMD 3,000 $MTCO_2e$ per year threshold.

Impact Analysis

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact: Construction GHG Emissions. Project construction would result in direct GHG emissions from construction equipment and the transport of materials and construction workers to and from the project site. Construction-generated GHG emissions would be temporary and would cease with completion of construction. Project construction would consist of demolition, site preparation, grading, infrastructure improvements, building

[49] South Coast Air Quality Management District. (2008). *Staff Report: Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans and Attachment E: Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, page 3-2.*

construction, paving, and architectural coating applications.[50] Project construction is anticipated to occur over an approximately 13-month period. Construction-generated GHG emissions associated with the Project were calculated using CalEEMod, which is designed to model emissions for land use development projects based on typical construction requirements. See **Appendix A** for more information regarding the construction assumptions used in this analysis.

Table 20: Project Construction Greenhouse Gas Emissions presents the total GHG emissions generated during Project construction. In accordance with the SCAQMD's guidance, GHG emissions from construction were amortized (i.e., averaged annually) over the lifetime of the Project.[51] As shown in the table, Project construction would result in 572 $MTCO_2e$ over the course of construction and approximately 19 $MTCO_2e$ per year when amortized.

Table 20: Project Construction Greenhouse Gas Emissions

Year	$MTCO_2e$
2028	236
2029	336
Total Construction[1]	572
Amortized over 30 Years	19

[1] Total may not add up exactly due to rounding in the modeling calculations.
$MTCO_2e$ = metric tons of carbon dioxide equivalent
Source: CalEEMod version 2022.1. Refer to **Appendix A** for the model outputs.

Less Than Significant Impact: Operational GHG Emissions. Operational or long-term GHG emissions would occur over the life of the Project. Operational GHG emissions would result from direct sources, such as project-generated vehicular traffic, and emergency fire pump, off-road forklifts, and area source usage (consumer products, architectural coatings, and landscape maintenance equipment). Operational GHG emissions would also result from indirect sources, such as electricity generation, water supply and wastewater treatment, solid waste generation, and fugitive refrigerants from air conditioning or refrigerators. Operational-generated emissions (i.e., area, energy, water, wastewater, solid waste, and fugitive refrigerants) associated with the Project were calculated using CalEEMod, which is designed to model emissions based on land use activity data and the Project vehicle trip generation. The Project would generate approximately 212 total daily vehicle trips (146 passenger vehicles and 66 truck vehicles); see Table 1 in **Appendix L**. The GHG emissions from an emergency diesel fire pump and three diesel forklifts were calculated separately from CalEEMod using default emission rates; refer to **Appendix A**. The solar panels emissions reduction was calculated based on the annual electricity provided by the solar panels (62.23 MWh per year) and default electricity intensity factor from the *CalEEMod User Guide*. The default electricity intensity factor is based on the Project's electricity provider (SCE) and the first operational year (2028). The Project operational GHG emissions are summarized in **Table 21: Project Operational Greenhouse Gas Emissions**. It should be noted that **Table 21** conservatively does not take credit for GHG emissions occurring under existing conditions. For example, the Project would result in a net reduction of 422 total daily vehicle trips when compared to existing

[50] Although not proposed, this analysis conservatively assumes full-width grind and overlay improvements along Cypress Way.
[51] The project lifetime is based on the standard 30-year assumption of the South Coast Air Quality Management District (South Coast Air Quality Management District. [2009]. *Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13*.

conditions; refer to Table 1 in **Appendix L**. Therefore, GHG emissions presented in **Table 21** are conservative and would be substantially lower when accounting for existing conditions.

Table 21: Project Operational Greenhouse Gas Emissions

Source	$MTCO_2e$ per year
Construction	19
Area	2
Electricity	175
Mobile	1,223
Water	75
Waste	32
Refrigeration	<1
Fire Pump	1
Off-Road Forklifts	76
Solar Panels	*-10*
Total	1,604
SCAQMD Threshold	3,000
Threshold Exceeded?	**No**

[1] Total may not add up exactly due to rounding in the modeling calculations.
$MTCO_2e$ = metric tons of carbon dioxide equivalent, SCAQMD = South Coast Air Quality Management District
Source: CalEEMod version 2022.1. Refer to **Appendix A** for the model outputs.

As shown in **Table 21**, the total operational GHG emissions associated with the proposed Project would not exceed the most conservative SCAQMD threshold. As such, impacts in regard to GHG emissions associated with Project implementation would be less than significant.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. This analysis determines the Project's consistency with SCAG's RTP/SCS, CARB 2022 Scoping Plan, and CAP.

SCAG RTP/SCS. Under SB 375, SCAG's 2024-2050 RTP/SCS establishes GHG emissions goals to reduce GHG emissions in the region by eight percent from 2005 levels by 2020 and 19 percent by 2035.[52] The RTP/SCS is a long-range vision plan that balances future mobility and housing needs with economic, environmental, and public health goals. The RTP/SCS plans account for operations and maintenance costs to ensure reliability, longevity, and cost effectiveness. The RTP/SCS are also supported by a combination of transportation and land use strategies that help the region achieve State GHG emissions reduction goals and FCAA requirements, increased housing production, improved equity and resilience, the preservation of natural lands, improvement of public health, increased transportation safety, support for the region's vital goods movement industries and more efficient use of resources. GHG emissions resulting from development-related mobile sources are the most potent source of emissions, and therefore Project comparison to the RTP/SCS is an appropriate indicator of whether the Project would inhibit the post-2020 GHG reduction goals

[52] California Air Resources Board. (N.D.). *SB 375 Regional Targets*. Retrieved from: https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/sb-375-regional-targets. Accessed September 9, 2025.

promulgated by the State. The Project's consistency with the 2024-2050 RTP/SCS goals in **Table 22: Regional Transportation Plan/ Sustainable Communities Strategy Consistency.**

Table 22: Regional Transportation Plan/Sustainable Communities Strategy Consistency	
SCAG Goals	**Compliance**
2024 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY CONSISTENCY[1]	
Mobility: Build and maintain an integrated multimodal transportation network.	
Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions.	**N/A:** This is not a project-specific policy and is therefore not applicable.
Ensure that reliable, accessible, affordable, and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities.	**N/A:** This is not a project-specific policy and is therefore not applicable.
Support planning for people of all ages, abilities, and backgrounds	**N/A:** This is not a project-specific policy and is therefore not applicable.
Communities: Develop, connect, and sustain communities that are livable and thriving.	
Create human-centered communities in urban, suburban, and rural settings to increase mobility options and reduce travel distances.	**Consistent:** The project site is located within 0.5 mile of SR-91 and SR-57 and in an urban area near existing employment opportunities and community services. The Project would also result in a net reduction of 422 daily vehicle trips when compared to existing conditions. The project site location and the reduction in daily trips would reduce trip lengths, VMT, and associated GHG emissions.
Produce and preserve diverse housing types in an effort to improve affordability, accessibility, and opportunities for all households.	**N/A**: The Project does not propose residential uses. Therefore, this is not a project-specific policy and is not applicable.
Environment: Create a healthy region for the people of today and tomorrow	
Develop communities that are resilient and can mitigate, adapt to, and respond to chronic and acute stresses and disruptions, such as climate change.	**Consistent:** The Project would develop a central warehouse on an infill site. The Project's reduction in net daily trips and the project site location in an urban area would reduce VMT and the associated GHG emissions. The Project would comply with all applicable energy efficiency and sustainability measures. Specifically, the Project would include solar panels, which would reduce the Project's dependence on the electrical grid and associated energy source emissions. The Project would additionally include drought-tolerant landscaping and an irrigation system that would adjust run times based on local weather conditions. The Project is located approximately 16 miles inland and would therefore not be subject to risks associated with sea level rise. The proposed warehouse would include central air condition to offer relief from increased exterior surface temperatures. The Project promotes GHG-reduction

Table 22: Regional Transportation Plan/Sustainable Communities Strategy Consistency	
SCAG Goals	**Compliance**
	strategies and is well suited to maintaining resiliency against the effects of climate change and associated health impacts.
Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water.	**Consistent:** The Project is not a transportation improvement Project. However, Project implementation would reduce the total daily trips and VMT to the project site, when compared to existing conditions. Additionally, the project site location in an urban area would reduce truck trip lengths and VMT. As such, Project implementation would reduce mobile associated GHG emissions. Additionally, the reduction of energy use, improvement of air quality, and promotion of more environmentally sustainable development are encouraged through compliance with the California Building Energy Efficiency Standards and the Green Building Standards Code.
Conserve the region's resources.	**Consistent:** As described in Section **4.2: Agriculture and Forestry Resources**, the project site is not located on or near land that is designated for agricultural purposes. Therefore, Project implementation would not result in a loss of the region's resources.
Economy: Support a sustainable, efficient, and productive regional economic environment that provides opportunities for all people in the region.	
Improve access to jobs and educational resources.	**Consistent:** The Project proposes a warehouse development within an urban area with residential, retail, and institutional land uses. The Project would provide approximately 113 jobs in an urban area, which would improve access to jobs opportunities.
Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities.	**Consistent:** The Project proposes a warehouse in an urban area near SR-91 and SR-57. Therefore, the Project would support efficient goods movement and would reduce VMT. Additionally, the Project would provide approximately 113 jobs to the local area. As summarized above, the Project would result in less than significant air quality and health risk impacts.

[1] Based on employee generation factor of one employee per 979 sf of warehouse use provided, the Project is anticipated to employ approximately 113 employees. Source: Natelson Company, Inc. (2001). *Employment Density Study Summary Report, Table 6A.*
N/A = not applicable; SR = State Route; VMT = vehicle miles traveled; LST = localized significance threshold; GHG = greenhouse gas
Sources: Southern California Association of Governments. (2024). *Connect SoCal (2024 – 2050 Regional Transportation Plan/Sustainable Communities Strategy).*

As shown in **Table 22**, the Project would be consistent with the applicable goals of the 2024-2050 RTP/SCS. Therefore, the Project would not interfere with SCAG's ability to achieve the region's post-2020 mobile source GHG reduction targets and a less than significant impact would occur.

CARB 2022 Scoping Plan. The 2022 Scoping Plan sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB 1279. The transportation, electricity, and industrial sectors are the largest GHG contributors in the State. The 2022 Scoping Plan provides guidance to achieve the AB 1279 targets primarily through zero-emission transportation (e.g., electrifying cars, buses, trains, and trucks).

Additional GHG reductions are achieved through decarbonizing the electricity and industrial sectors.

Statewide strategies to reduce GHG emissions in the latest 2022 Scoping Plan include implementing SB 100, which would achieve 100 percent clean electricity by 2045; achieving 100 percent ZE vehicles in 2035 through Advanced Clean Cars II,[53] and implementing the Advanced Clean Fleets regulation to deploy ZE buses and trucks.[54] Additional transportation policies include the Potential Phased Advanced Clean Equipment Regulation, Clean Off-Road Fleet Recognition Program, In-use Off-Road Diesel-Fueled Fleets Regulation, and Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation. The 2022 Scoping Plan would continue to implement SB 375. Project GHGs would be further reduced through the Cap-and-Trade Program carbon pricing and SB 905. SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate carbon dioxide removal projects and technology.

As indicated in **Table 21**, approximately 87 percent of the proposed Project's GHG emissions are from energy (i.e., electricity generation) and mobile sources, which would be further reduced by the 2022 Scoping Plan measures described above. The Project would include solar panels, which would reduce the Project's electricity consumption and associated energy source emissions. The Project would result in a net reduction of 422 total daily vehicle trips when compared to existing conditions. As such, Project implementation would decrease VMT and associated mobile source emissions. Additionally, energy and mobile source emissions would further decline in the future due to statewide measures discussed above, as well as cleaner technology and fleet turnover. Therefore, the reduction of GHG emissions would be consistent with the 2022 Scoping Plan's goal to reduce GHG emissions.

Following compliance with all applicable regulations, the proposed Project would not conflict with the State's progress towards carbon neutrality under the 2022 Scoping Plan. While these measures are not directly applicable to the Project, any commercial activity associated with goods movement would be required to comply with these measures as adopted. The Project would not obstruct or interfere with efforts to increase ZE vehicles or State efforts to improve system efficiency, nor conflict with the State's progress towards carbon neutrality under the 2022 Scoping Plan. It is also noted that the Project would not convert any Natural and Working Lands and/or decrease the urban forest carbon stock in the State, which are areas of emphasis in the 2022 Scoping Plan. As such, the Project would not interfere with implementation of the 2022 Scoping Plan and a less than significant impact would occur.

City of Fullerton Climate Action Plan. The CAP includes strategies directed at reducing citywide GHG emissions through energy use and conservation, water use and efficiency, transportation and mobility, and solid waste reduction and recycling. The CAP establishes that projects that demonstrate consistency with the emission projections, emission reduction targets, or strategies contained in the CAP would have a less than significant impact on climate change. As stated in

[53] On May 22, 2025, the United States Senate voted to revoke the waiver granted by the Biden administration for the Advanced Clean Cars II program. On June 12, 2025, the Trump Administration formally nullified the Advanced Clean Cars II program.

[54] On January 13, 2025, CARB withdrew their requests for Clean Air Act waivers from the U.S. EPA needed to support four recently adopted vehicle emissions regulations: (1) the Advanced Clean Fleets Regulations; (2) the In-Use Locomotive Regulations; (3) part of the Commercial Harbor Craft and Ocean-Going Vessels At-Berth Regulations; and (4) part of the Transport Refrigeration Unit Engine Standards Regulations. Therefore, implementation of these regulations is currently unknown.

Section 4.3: Air Quality, the project site is consistent with The Fullerton Plan land use designation. Therefore, project-related emissions have been accounted for in the City's projected emissions forecast. As stated above, the Project would comply with the CARB 2022 Scoping Plan strategies aimed at reducing GHG emissions. Therefore, the Project would be consistent with the emission reduction targets. Additionally, Project consistency with the CAP strategies are discussed below:

- **Energy Use and Conservation.** The proposed Project would be an infill development and would be designed in compliance with the latest Title 24 Energy Code and CALGreen Code. Therefore, the Project would improve energy efficiency when compared to existing conditions.
- **Water Use and Efficiency.** The Project would comply with the City's Water Efficiency Landscape Ordinance. The Project would include drought-tolerant landscaping and low flow irrigation systems with a smart controller that adjusts the water flow based on weather conditions. Furthermore, the Project would comply with the latest CALGreen Code water conservation requirements.
- **Transportation and Mobility.** The project site's location within an urban area would reduce trip lengths and VMT. Additionally, the Project would result in a net reduction of 422 total daily trips when compared to existing conditions. Further, the Project would provide long-term bicycle parking and 4 EVCS, thus promoting alternative modes of transportation.
- **Solid Waste Reduction and Recycling.** Project construction would comply with the CALGreen Code, which requires 65 percent of waste to be diverted. Additionally, the Project would comply with AB 341, which requires implementation of a recycling program to divert solid waste from landfills.

As discussed herein, the Project would be consistent with the City's emission forecasts, emissions reduction targets, and CAP strategies. Impacts in regard to Project consistency with the CAP are less than significant. Therefore, the Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. A less than significant impact would occur, and no mitigation is required.

4.9 HAZARDS AND HAZARDOUS MATERIALS

ENVIRONMENTAL IMPACTS	Potentially Significant Issues	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
9. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e) For a project located within 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 result in a safety hazard or excessive noise for people residing or working in the project area?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				X

The basis for the following information and analysis is the Phase I Environmental Site Assessment (Phase I ESA) (Orswell & Kasman, October 2023), which is provided as **Appendix F: Phase I Environmental Site Assessment**.

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less than Significant Impact. The proposed Project would include the demolition of the existing business park and associated improvements. As stated in the Phase I Environmental Site Assessment (ESA), during the site investigation, a visual inspection was conducted for presumed asbestos-containing materials (PACMs), lead-based paint, and mold. It was concluded based on the age of the building and visual inspection that PACMs were in good condition, lead-based paint would not be a health hazard, and no mold concerns were identified. In addition, based on the Orange County CA EPA radon concentration Zone 3, the Project would not impacted by radon gas.

Project construction would involve the transport, storage, use and/or disposal of limited quantities of hazardous materials, such as fuels, solvents, degreasers, and paints. The use of these materials during construction would be short-term and would occur in accordance with standard construction practices, as well as with applicable federal, State, and local regulations. Potentially hazardous materials would be contained, stored, and used during construction in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Examples of such activities include fueling and servicing construction equipment and applying paints and other coatings. Project construction would be temporary, and on-site activities would be governed by existing regulations of several agencies. Construction activities would be subject to compliance with relevant regulatory requirements and restrictions concerning the transport, use, or disposal to prevent a significant hazard to the public or environment. The regulatory requirements include SCAQMD Rule 1403 (fugitive dust). In addition, should a spill or other hazardous materials incident occur, construction staff would stop work and contact a qualified contractor that is well-versed in handling such a situation. All construction activities would be performed in compliance with the California Division of Occupational Safety and Health (Cal/OSHA) regulations.

Project operations would not involve the use or storage of hazardous substances other than limited quantities of hazardous materials such as solvents, fertilizers, pesticides, and other materials used for regular maintenance of buildings and landscaping. The use of these materials already occurs within the site associated with the existing use, and the quantities of these materials would not typically be at an amount that would pose a significant hazard to the public or the environment. The routine transport, use, and disposal of these materials must adhere to federal, State, and local regulations for transport, handling, storage, and disposal of hazardous substances; such as the Hazardous Materials Transportation Act and Hazardous Materials Release Response Plans and Inventory Act, which address safe handling procedures and emergency response procedures in the event of an accidental release. Therefore, following compliance with applicable federal, State, and local regulations, Project operations would not result in a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant, and no mitigation would be required.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. The project site was developed in 1983 as a five-building multi-tenant business park. The site is currently comprised of approximately 85,700 square-feet of office, industrial, and commercial uses between five buildings, a surface parking lot, and landscaping. Due to the project site's existing use, there is a potential that prior tenants and land uses could have resulted in the accidental release of hazardous materials into the environment. A Phase I ESA was prepared to identify recognized environmental conditions (RECs) that may exist at the project site, including historical recognized environmental conditions (HRECs), controlled recognized environmental conditions (CRECs), and vapor migration. The Phase I ESA reported no RECs, HRECs, or CREDs and no off-site locations with potential threat of vapor migration to the project site. As noted above, there would be no potential presence of asbestos-containing materials, lead-based paints, mold, or radon.

Outlined in the Phase I ESA a review of the CAL-EPA Department of Toxic Substances Control (DTSC) and Regional Water Quality Control Board (RWQCB) databases did identify multiple open DTSC/RWQCB cases surrounding the site, however most are downgradient and recent plume maps are away from the project site. There are two DTSC cases georeferenced cross-gradient as Winonics, Inc. and the Placentia Avene School Site. These sites are listed to need evaluation; however, the Phase I ESA states that due to the locational distance away from the project site, it would not likely have a significant impact on the site. There are no hazardous clean-up cases on the project site. Therefore, Project construction would not create a significant hazard to the public or to the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

The Project would not generate or facilitate the generation of hazardous materials. The proposed Project would involve typical hazardous materials/chemicals associated with warehouse uses such as fuels, paints, mechanical fluids, cleaners, solvents, and fertilizers and pesticides for landscaping. However, the types and quantities of materials used and stored on site would not be of a significant quantity to create a reasonably foreseeable upset or accident. Additionally, any routine use, storage, and transport of hazardous materials during Project operations must adhere to federal, State, and local regulations for transport, handling, storage, and disposal of hazardous substances. Hazardous materials/chemicals such as fuels, cleaners, paints, solvents and fertilizers in low quantities do not pose a significant threat related to the release of hazardous materials into the environment.

Title 24 requires solar arrangements on industrial buildings to have battery storage systems to provide backup power in case of emergencies or grid outages. The battery storage system would be regulated by Title 24, Part 9 California Fire Code (CFC). The CFC incorporates standards from the International Fire Code (IFC) and the National Fire Protection Association (NFPA) (NFPA 855), to mitigate fire, explosion, and toxic gas risks. Battery storage systems are required to comply with SCAQMD permitting and regulatory requirements, that focus on fire safety and set emission limits of toxic air contaminants. SCAQMD Rule 1420.1 requires negative pressure enclosures, emission control devices, and ambient air monitoring for lead, for which the project would need to comply. Furthermore, state-level legislation like Senate Bill 38 mandates safety protocols of emergency

response plans for battery storage systems that are designed to complement the California Public Utilities Commission, and the SCAQMD's own Clean Energy Policy aims to promote battery systems that meet emission standards and climate goals. Therefore, with implementation of SCAQMD Rule 1420.1, Senate Bill 38, and implementing measures consistent with the best practices recommended by the SCAQMD, any future battery storage systems that would be installed by the project, would not be anticipated to add significant operational emissions that would contribute to hazardous impacts or adverse health effects. Therefore, Project operations would not result in the accidental release of hazardous materials. Operational impacts would be less than significant, and no mitigation is required.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. The nearest school to the project site is Commonwealth Elementary School located approximately 1.0 mile north of the project site. Therefore, there are no schools within one-quarter mile of the project site. The Project is not anticipated to generate hazardous emissions or involve the handling of hazardous materials, substances, or waste in significant quantities that would have an impact to surrounding schools. The types of hazardous materials that would be routinely handled would be limited to fuels, paints, mechanical fluids, cleaners, solvents, and fertilizers and pesticides for site landscaping. The Project would be required to adhere to all applicable federal, State and regional regulations regarding handling, transport and disposal of hazardous materials. Therefore, the Project would not emit hazardous emissions or handle hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. No impact would occur, and no mitigation is required.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. Government Code Section 65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List, maintained by the DTSC. The Cortese List identifies hazardous waste and substance sites including public drinking water wells with detectable levels of contamination; sites with known USTs having a reportable release; and solid waste disposal facilities from which there is a known migration. The Cortese List also includes hazardous substance sites selected for remedial action; historic Cortese sites; and sites with known toxic material identified through the abandoned site assessment program. Review of EnviroStor[55] and GeoTracker[56] databases indicate the project site is not on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. No impact would occur and no mitigation is required.

e) For a project located within 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 result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. Fullerton Municipal Airport is located in the western portion of the City, within the Airport Industrial Focus Area. The project site is not located within the Airport Industrial Focus Area

[55] Department of Toxic Substance Control. (2025). *Envirostor Database*. Retrieved from https://www.envirostor.dtsc.ca.gov/public/.
[56] State Water Resources Control Board. (2025). *GeoTracker*. Retrieved from https://geotracker.waterboards.ca.gov/.

nor is it located within any Runway Protection Zone or Accident Potential Zones. The project site is located approximately 5 miles to the east of the Fullerton Municipal Airport. Accordingly, the proposed Project would not result in a safety hazard for people working in the area associated with the airport or project site and impacts would be less than significant.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The Fullerton Safety Element Supplemental identifies potential evacuation routes that could be used during a hazard event. [57] These roadways are intended to meet evacuation needs. The City's Emergency Operations Plan provides guidance for the City's planned response to extraordinary emergency situations associated with natural disasters, terrorism, technological incidents, and nuclear defense operations. The Emergency Operations Plan anticipates that all major streets within the City would serve as evacuation routes. City highways and arterial streets that connect to SR-91 and SR-57 would serve as potential evacuation routes, in the event of an extraordinary emergency situation.

Orangethorpe Avenue, which the project site is located adjacent to, is identified as an emergency evacuation route. Local access to the project site would still be provided via two driveways along Orangethorpe Avenue. Project operations are not anticipated to result in significant queuing along adjacent roadways that could potentially impede emergency vehicles or impair any emergency evacuation plan. The Project does not propose modification to roadways adjacent to the project site.

Project-related construction activities could temporarily impact street access and traffic flow due to off-site improvements on Orangethorpe Avenue and potential extension of construction activities into the rights-of-way for utility connections, resulting in temporary lane closures. Prior to the issuance of a building permit, the applicant is required to submit appropriate plans for plan review to ensure compliance with zoning, building, and fire codes. The Project would be required to comply with standard conditions SC HAZ-1 and prepare a Traffic Control Plan for implementation during the construction phase, as deemed necessary by the City Traffic Engineer, as well as SC HAZ-2, in which the City Community and Economic Development Department would consult with the Fullerton Police Department to disclose temporary closures and alternative travel routes, in order to ensure adequate access for emergency vehicles when construction of a development results in temporary lane or roadway closures. Therefore, implementation of these standard conditions would ensure the Project would not impair the implementation of or physically interfere with an emergency response plan or emergency evacuation plan. Project impacts would be less than significant and no mitigation is required.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The California Department of Forestry and Fire Protection (CAL FIRE) has mapped fire threat potential throughout California. CAL FIRE threats are based on the availability of fuel and the likelihood of an area burning (based on topography, fire history, and climate). According to CAL

[57] City of Fullerton. (2024). Safety Element Supplement, Exhibit 1: Potential Evacuation Routes in Fullerton. Retrieved from: https://www.cityoffullerton.com/home/showpublisheddocument/8834/638586480019470000. Accessed July 9, 2025.

FIRE's Fire Hazard Severity Zones Map for the City, the project site is not located in or near a State Responsibility Area (SRA) nor Very High Fire Hazard Severity Zone (VHFHSZ).[58] As illustrated in the Fullerton 2021-2029 Safety Element Exhibit 5: Fire Hazard Severity Zones in Fullerton the project site is located in a Local Responsibility Area (LRA).[59] As shown in CAL FIRE's FHSZ Viewer, the closest VHFHZ to the project site is located approximately 4 miles northwest of the site. The project site is located within an urbanized area. The project site and surrounding area are not within or located adjacent to any wildlands or areas identified as being at risk of wildland fires. Therefore, the proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, and no impact would occur.

Standard Conditions and Requirements

SC HAZ-1: Prior to construction, future developers shall prepare a Traffic Control Plan for implementation during the construction phase, as deemed necessary by the City Traffic Engineer. The Plan may include the following provisions, among others:

- At least one unobstructed lane shall be maintained in both directions on surrounding roadways.
- At any time only a single lane is available, the developer shall provide a temporary traffic signal, signal carriers (i.e., flag persons), or other appropriate traffic controls to allow travel in both directions.
- If construction activities require the complete closure of a roadway segment, the developer shall provide appropriate signage indicating detours/alternative routes.

SC HAZ-2: The City Community and Economic Development Department shall consult with the Fullerton Police Department to disclose temporary closures and alternative travel routes, in order to ensure adequate access for emergency vehicles when construction of a development results in temporary lane or roadway closures.

[58] CAL FIRE. (2024). Fire Hazard Severity Zones Viewer. Retrieved from: https://egis.fire.ca.gov/FHSZ/. Accessed on July 9, 2025.
[59] City of Fullerton. (2024). Safety Element Supplement, Exhibit 5 Fire Hazard Severity Zones in Fullerton. Retrieved from: https://www.cityoffullerton.com/home/showpublisheddocument/8834/638586480019470000. Accessed July 9, 2025.

4.10 HYDROLOGY AND WATER QUALITY

ENVIRONMENTAL IMPACTS	Potentially Significant Issues	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
10. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
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?			X	
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?			X	
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?			X	
iv) Impede or redirect flood flows?				X
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			X	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

This section is based on the Preliminary Water Quality Management Plan (PWQMP) (Pacific Consulting Group, Inc., 2025) which is included in its entirety as **Appendix G: Preliminary Water Quality Management Plan** and the Hydrology and Hydraulic Report (Pacific Consulting Group, Inc., 2025) which is included in its entirety as **Appendix H: Hydrology and Hydraulic Report.**

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

Less than Significant Impact. Project impacts related to water quality could occur over three different periods:

- During the earthwork and construction phase, where the potential for erosion, siltation, and sedimentation would be the greatest;
- Following construction, before the establishment of ground cover, when the erosion potential may remain relatively high; and
- After project completion, when impacts related to sedimentation would decrease markedly but those associated with urban runoff would increase.

Urban runoff, both dry and wet weather, discharges into storm drains, and in most cases, flows directly to creeks, rivers, lakes, and the ocean. Polluted runoff can have harmful effects on drinking water, recreational water, and wildlife. Urban runoff pollution includes a wide array of environmental, and stormwater characteristics dependent on site conditions (e.g., land use, impervious cover, and pollution prevention practices), rain events (duration, amount of rainfall, intensity, and time between events), soil type and particle sizes, the amount of vehicular traffic, and atmospheric deposition. Major pollutants typically found in runoff from urban areas include sediments, nutrients, oxygen-demanding substances, heavy metals, petroleum hydrocarbons, pathogens, and bacteria. Most urban stormwater discharges are non-point sources.

Construction. Short-term construction activities associated with the proposed Project could impact water quality. Sources of potential construction-related storm water pollution include handling, storage, and disposal of construction materials containing pollutants; maintenance and operation of construction equipment; and site preparation activities, such as excavation, grading and trenching. These sources, if not controlled, can generate soil erosion and on- and off-site transport via storm run-off or mechanical equipment. Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze, or other vehicle-related fluids on the project site are also common sources of storm water pollution and soil contamination. Implementation of the proposed Project has the potential to produce typical pollutants such as nutrients, heavy metals, pesticides and herbicides, toxic chemicals related to construction and cleaning, waste materials including wash water, paints, wood, paper, concrete, food containers, and sanitary wastes, fuel, and lubricants. Generally, standard safety precautions for handling and storing construction materials can adequately reduce the potential pollution of storm water by these materials. These types of standard procedures can be extended to non-hazardous storm water pollutants such as sawdust, concrete washout, and other wastes.

Grading activities would displace soils and temporarily increase the potential for soils to be subject to wind and water erosion. Two general strategies are recommended to prevent soil materials from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed, and secondly, the project site should be secured to control off-site transport of pollutants. In order to reduce the amount of on-site exposed soil, grading would be limited to the extent feasible, and any graded areas would be protected against erosion once they are brought to final grade. Additionally, the proposed Project would be required to comply

with the Construction General National Pollutant Discharge Elimination System (NPDES) Permit and the FMC.

Construction-related erosion effects would be addressed through compliance with the NPDES program's Construction General Permit. Construction activity subject to this General Permit includes any construction or demolition activity, including, but not limited to, clearing, grading, grubbing, or excavation, or any other activity that results in a land disturbance of equal to or greater than one acre. The Project would disturb approximately 4.8 acres and therefore would be subject to the General Permit. To obtain coverage under the General Permit, dischargers are required to file with the State Water Resources Control Board (SWRCB) the Permit Registration Documents (PRDs), which include a Notice of Intent (NOI) and other compliance-related documents. The General Permit requires development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) and monitoring plan, which must include erosion-control and sediment-control BMPs that would meet or exceed measures required by the General Permit to control potential construction-related pollutants. Erosion-control BMPs are designed to prevent erosion, whereas sediment controls are designed to trap sediment once it has been mobilized.

Project construction activities would also be required to comply with water quality measures included in the City of Fullerton's Water Quality Ordinance (FMC Chapter 12.18, Water Quality Ordinance). The City's Water Quality Ordinance requires compliance with the Orange County Drainage Area Management Plan (DAMP) and any conditions and requirements established by the City in order to meet Federal and State water quality requirements related to storm water runoff. These regulations would require the Project contractor to include BMPs to ensure that the discharge of pollutants from the site would be effectively prohibited and would not cause or contribute to an exceedance of water quality standards or alter water quality during construction.

In accordance with FMC Section 12.18.030, Control of Urban Runoff, prior to issuance of grading permits, the planning agency would be required to review the Project plans and impose terms, conditions and requirements on the Project in accordance with the DAMP and any conditions and requirements established by the City that are reasonably related to the reduction or elimination of pollutants in stormwater runoff from the project site. Therefore, through adherence to the County of Orange DAMP, the NPDES Stormwater Program and FMC regulations, specified under SC HYD-1 and SC HYD-2, construction-related activities would not violate any water quality standards or otherwise substantially degrade surface or groundwater quality and impacts would be less than significant.

Operations. The project site is located within the jurisdiction of the Santa Ana Regional Water Quality Control Board (RWQCB) and would be subject to compliance with the Phase I Municipal Separate Storm Sewer System (MS4) permit. Under the MS4 permit issued by the Santa Ana RWQCB (Waste Discharge Requirements for the County of Orange, Orange County Flood Control District and Incorporated Cities of Orange County within the Santa Ana Region Areawide Urban Storm Water Runoff, Order No. R8-2009-0030), co-permittees, including the City of Fullerton, must prepare a WQMP and implement BMPs, where feasible, to capture and treat stormwater prior to discharge to their MS4 facilities. Prior to building permit issuance, the Applicant would be required to submit a Final WQMP to the City for review and compliance with the County's NPDES stormwater permit. The Final WQMP would be required to specific the BMPs to be incorporated

into the final Project design to address pollutants of concern associated with runoff from the project site.

The project site is currently developed with a multi-tenant business park and associated improvements, including surface parking and ornamental landscaping. Under existing conditions, the site generally flows from south to north throughout the property. The existing drainage is conveyed via sheet flow through ribbon gutters before it is discharged to Cypress Way through two curb outlets. There is no record of any public stormwater infrastructure adjacent to the project site. Stormwater is assumed to be carried downstream of the project site in the curb and gutter in Cypress Way and conveyed northerly on State College Boulevard where a catch basin is located approximately 1,400 feet away northwest of the project site.

The Preliminary WQMP identifies pollutants of concern associated with the proposed Project, including suspended-solid/sediment, nutrients, pesticides, oil and grease, toxic organic compounds, and trash and debris. Additionally, the Preliminary WQMP documents the various BMPs that would be implemented as part of the Project, which include biotreatment, treatment control, non-structural source control, and structural source control BMPs to address water quality conditions associated with the proposed Project. Proposed hydrologic source controls include on-lot infiltration and impervious area reduction; infiltration BMPs include drywells; treatment control BMPs include a filter insert for each catch basin/trench drain; proposed non-structural BMPs include education, activity restrictions, common area landscape management, BMP maintenance, local industrial permit compliance, spill contingency plan, hazardous materials disclosure, common area litter control, employee training, housekeeping of loading docks, common area catch basin inspection, and street sweeping private streets; and structural source control BMPs include storm drain stenciling and signage, design and construction of trash and waste storage areas, efficient irrigation systems and landscape design, dock areas, and wash water control; refer to **Appendix G** for a detailed list of proposed BMPs.

The project site is currently 14.1 percent (29,185 square feet) pervious area and 85.9 percent (179,031 square feet) impervious area. In the proposed condition, the project site would be 9.2 percent (19,166 square feet) pervious area and 90.8 percent (189,486 square feet) impervious area. Therefore, the Project would increase pervious area in the proposed condition.

As concluded in the Preliminary WQMP, infiltration has been deemed feasible through sampling and testing from the Geotechnical Investigation. Therefore, the Project includes infiltration BMPs via drywells. The drywells would be sized according to the North Orange County Technical Guidance Document to infiltrate the 85th percentile, 24-hour storm event. Any overflow due to large storm events in excess of the design storm (85th percentile) would be conveyed to Cypress way through means of curb outlets to replicate the existing condition.

Under the proposed condition, runoff generated from the site would fall into two main drainage areas. Roof runoff would be collected through roof drains and directly connected to conveyance piping below grade. Surface drainage would be collected through drains with filters before being conveyed to the drywell system. The drywell system is composed of a manhole shaft that would accumulate sediment and any debris which would be removed during the standard maintenance of the facilities.

Implementation of standard conditions and the proposed on-site stormwater system and Final WQMP, including water quality operational BMPs, would reduce pollutants of concern associated with the stormwater runoff from the project site in compliance with the County's MS4 Permit and ensure the proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. 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?

Less than Significant Impact. The City of Fullerton provides water service to the City, including the project site. According to the Fullerton 2020 Urban Water Management Plan (2020 UWMP), the project site is located within Pressure Zone 4 in the southeast of the City.[60] The City is a retail water supplier that receives its water supplies from a combination of imported potable water from Metropolitan Water District of Southern California (MWD) and local groundwater from the Orange County Groundwater Basin (OC Basin), which is managed by the Orange County Water District (OCWD). The City's main source of water supply is groundwater from the OC Basin. Imported water supplements the City's water supply portfolio.

The City's Water Utility operates 15 reservoirs with a capacity of 67.5 million gallons, 12 booster pumping stations, 8 active groundwater wells, and manages a 424-mile water mains system with approximately 31,936 service connections. The Fullerton 2020 UWMP forecasts the City's total retail water demand to be 27,850-acre feet (AF) by 2045.

The Fullerton 2020 UWMP indicates water supplies would meet the service area's water demands for normal, single dry, and multiple dry year conditions through 2045. UWMP water demand forecasts are based in part on adopted General Plans. The Fullerton Plan identifies the development capacity associated with implementation of The Fullerton Plan land use designations. The Fullerton Plan Community Development Plan (General Plan Community Development and Design Exhibit 2) designates the project site as Industrial (I) within the Southeast Industrial Focus Area.

The Project's average daily water demand would be approximately 3,196 gallons per day (GPD), an increase of 344 GPD from existing conditions. As discussed under Threshold 4.19b, while the Project would result in a minor increase from existing conditions, the Water Demand Assessment concluded based on fire flow testing that the increase would not significantly impact existing infrastructure and would be able to be serviced by the City (**Appendix J**). Further, as discussed in **Section 4.14:, Population and Housing**, the Project would be consistent with the existing land use designation and would not result in significant new unanticipated employment opportunities. Therefore, the proposed Project would be within the population projections anticipated by the City and the 2020 UWMP. Therefore, the Project would not conflict with UWMP demand projections and would not substantially decrease groundwater supplies. Project impacts would be less than significant and no mitigation is required.

[60] Arcadis. (June 2021). *2020 UWMP for City of Fullerton*. Available at: https://www.cityoffullerton.com/home/showpublisheddocument/5052/637598829614070000, Accessed July 15, 2021.

As noted above, Project implementation would decrease the site's effective imperviousness from approximately 86 percent to 91 percent, resulting in a potential increase of runoff in the post-development condition. However, the increased runoff would be offset by the proposed drywells which would infiltrate at 0.62 cubic feet per section (cfs), which is greater than the increase of runoff generated. This would effectively decrease the amount of runoff generated under the proposed condition and increase infiltrating stormwater. Therefore, the Project would not interfere with groundwater recharge nor would groundwater recharge would be impeded. Therefore, the Project would neither substantially deplete groundwater supplies nor interfere substantially with groundwater recharge, such that the project may impede sustainable groundwater management of the basin, and a less than significant impact would 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?

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

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?

iv) Impede or redirect flood flows?

Less than Significant Impact. As noted in Threshold 4.10a, under existing conditions, runoff on the project site is conveyed via sheet flow through ribbon gutters before it is discharged to Cypress Way through two curb outlets. Stormwater is assumed to be carried downstream of the project site in the curb and gutter in Cypress Way and conveyed north along State College Boulevard where a catch basin is located approximately 1,400 feet away northwest of the project site.

Under proposed conditions, the Project would not result in a significant change to the site's drainage pattern and flows would continue to discharge northwest toward Cypress Way. As previously addressed, under proposed conditions, the project site is composed of two main drainage areas. Drainage Area A on the west side of the property and Drainage Area B on the east and north end of the property.

Drainage Area A is 2.83 acres and approximately 57 percent of the building roof drainage as well as 56,616 square feet of paved and hardscaped runoff. The area would contain parking areas and drive aisles along with landscaping and hardscaped walkways. Drainage Area A consists of a sump condition for the loading docks. As described above, the runoff would be conveyed via sheet flow to its respective collection device (roof drains, area drains, catch basins) before it would be conveyed via pipe flow to the drywell. Downstream of the drywell, a sump pump would be used to discharge excess runoff volumes. The pump would discharge to a catch basin to transition from pressure flow to gravity flow before finally discharging through the curb outlet in Cypress Way.

Drainage Area B is 1.96 acres and approximately 43 percent of the building runoff and 28,539 square feet of paving and hardscape. The area would contain parking areas and drive aisles along with landscaping and hardscaped walkways. This area would collect runoff via the curb and gutter

located at the east side of the property and the ribbon gutter to the north. This gutter would intermittently intercept flow and convey runoff through conveyance piping. The conveyance piping would convey the tributary runoff to the drywell located at the northeast corner of the property. Larger storm events would overflow from the drywell to an overflow pipe before eventually being conveyed to Cypress Way through means of a curb outlet. Larger storm events that would have to utilize the overflow would discharge via gravity.

Overall site hydrology is comprised of sheet flowing runoff by gravity through to surface drainage features such as area drains and catch basins. These surface drainage features connect to on-site conveyance piping that would take runoff to two drywells located in the northwest corner of the property, one for each drainage area and sized to be compliant with the Orange County Water Quality Management Plan.

The drywell system is composed of a manhole shaft that would accumulate sediment and any debris which would be removed during the standard maintenance of the facilities. Any overflow due to large storm events in excess of the design storm (85th percentile) would be conveyed to Cypress Way through means of curb outlets to replicate the existing condition. As noted above, Project implementation would decrease the site's effective imperviousness from approximately 86 percent to 91 percent, resulting in potentially an increase of runoff of the post-development condition. However, the increased runoff would be offset by the proposed drywells which would infiltrate at 0.62 cfs, which is greater than the increase of runoff generated. Further, the drywells are designed to retain and store a total of 1,402 CF of water. This additional storage would decrease and offset peak flows during large storm events that may discharge to Cypress Way. Therefore, effectively decreasing the amount of runoff generated under the proposed condition. Overall, the Project would not impede or redirect flood flows, increase rate or amount of runoff such that flooding would occur on or off the site, nor would it exceed the capacity of existing or planned drainage systems.

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

Less than Significant Impact. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) No. 06059C0132J, the project site is located within "Zone X," which is considered to be an area of minimal flood hazard and is not considered a special flood hazard area. Accordingly, impacts related to release of pollutants due to project inundation in a flood hazard zone would be less than significant.

Tsunamis are sea waves that are generated in response to large-magnitude earthquakes, which can result in coastal flooding. Seiches are the oscillation of large bodies of standing water, such as lakes, that can occur in response to ground shaking. The project site is approximately 14.5 miles east of the Pacific Ocean and there are no large bodies of standing water near the project site. As a result, tsunamis and seiches do not pose hazards due to the project site's inland location and lack of nearby bodies of standing water. As the project site is not located within a tsunami or seiche zone, the Project would not risk of release of pollutants due to Project inundation; impacts would be less than significant.

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

Less than Significant Impact. Refer to Responses 4.10(a) regarding water quality. As noted in Threshold 4.10b, the City's local groundwater water supply is produced from the Orange County Groundwater Basin (OC Basin). The OC Basin underlies the northerly half of Orange County beneath broad lowlands. The OC Basin, managed by OCWD, covers an area of approximately 350 square miles, bordered by the Coyote and Chino Hills to the north, the Santa Ana Mountains to the northeast, and the Pacific Ocean to the southwest.

In accordance with the California Urban Water Management Planning Act, the City of Fullerton must prepare and adopt a UWMP every five years. The City's most recent 2020 UWMP, which was published in 2021, describes the City's management operations in achieving the maximum practicable conservation and efficient use of local water resources.

The 2020 UWMP estimated a total water demand of 27,850 AF by 2045. Additionally, the City's population is expected to increase from 141,648 persons in 2020 to 189,687 persons by 2045. In case of a water supply shortage, the City has prepared a Water Shortage Contingency Plan to ensure adequate service. The Water Shortage Contingency Plan serves as the operating manual detailing processes and procedures to be deployed during shortage conditions, enabling the City and water retail agencies to identify and efficiently implement pre-determined steps to mitigate a water shortage.

Further, as discussed in **Section 4.14: Population and Housing**, the Project would be consistent with the existing land use designation and would not result in significant new unanticipated employment opportunities. Therefore, the proposed Project would be within the population projections anticipated by the City and the 2020 UWMP. Further, as noted above and concluded in the Water Demand Assessment, the Project's average daily water demand would be approximately 3,196 GPD, an increase of 344 GPD from existing conditions. As discussed, it was concluded based on fire flow testing that the increase would not significantly impact existing infrastructure and the proposed Project would be able to be serviced by the City. Therefore, the Project's anticipated water demand is accounted for in the UWMP, and there would be sufficient water supplies available to serve the Project development during normal, dry and multiple dry years. Impacts to water supply would be less than significant. Therefore, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan and impacts would be less than significant.

Standard Conditions and Requirements

SC HYD-1 Prior to issuance of any Grading or Building Permit, and as part of the future development's compliance with the NPDES requirements, a Notice of Intent shall be prepared and submitted to the Santa Ana RWQCB providing notification and intent to comply with the State of California General Construction Permit. Also, a Stormwater Pollution Prevention Plan (SWPPP) shall be reviewed and approved by the Director of Engineering for water quality construction activities on-site. A copy of the SWPPP shall be available and implemented at the construction site at all times. The SWPPP shall outline the source control and/or treatment control BMPs to avoid or mitigate runoff pollutants at the construction site to the "maximum extent practicable." All recommendations in the

Plan shall be implemented during area preparation, grading, and construction. The project applicant shall comply with each of the recommendations detailed in the Study, and other such measure(s) as the City deems necessary to mitigate potential stormwater runoff impacts.

SC HYD-2 Prior to issuance of any Grading Permit, future development projects shall prepare, to the satisfaction of the Director of Engineering, a Water Quality Management Plan or Stormwater Mitigation Plan, which includes Best Management Practices (BMPs), in accordance with the Orange County Drainage Area Master Plan (DAMP). All recommendations in the Plan shall be implemented during post construction/operation phase. The project applicant shall comply with each of the recommendations detailed in the Study, and other such measure(s) as the City deems necessary to mitigate potential water quality impacts.

4.11 LAND USE AND PLANNING

ENVIRONMENTAL IMPACTS	Potentially Significant Issues	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
11. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?				X
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			X	

a) Physically divide an established community?

No Impact. The Applicant is proposing the demolition of the existing approximately 85,700-square-foot Cedarwoods Business Park and the construction and operation of a new 110,232-square-foot warehouse/distribution facility with a surface parking lot and gated truck court. The proposed building would have 100,232 square feet of warehouse space and 10,000 square feet of ancillary office space that is split evenly between the ground level and mezzanine. The surrounding areas are zoned M-P and M-G, and designated as Industrial (I). Orangethorpe Avenue is located south of the project site. The property located south of Orangethorpe Avenue is located within the City of Anaheim and zoned Industrial by the City of Anaheim. The Project would not involve any roadways or significant infrastructure systems that would physically divide an established community or surrounding areas. Development of the Project would be consistent with surrounding land uses. Therefore, the Project would not divide an established community, and no impact would occur.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less than Significant Impact.

The Fullerton Plan's Community Development Plan (Community Development and Design Exhibit 2) depicts the City's land use designations and identifies that the project site is designated Industrial. The Industrial (I) land use designation is intended to protect and enhance the City's major employment areas by providing opportunities for manufacturing, product assembly, research and development, warehousing, and supporting uses and amenities.[61] Therefore, the proposed Project would be consistent with the project site's Industrial (I) land use designation.

The project site is located within the Southeast Industrial Focus Area. The Focus Area is composed mainly of large parcels with one- and two-story buildings and is characterized by businesses that operate during traditional working hours, with minimal nighttime activity.

[61] City of Fullerton. (2012). The Fullerton Plan. https://www.cityoffullerton.com/government/departments/community-and-economic-development/planning-zoning/general-plan/the-fullerton-plan-current-version. Accessed September 10, 2025.

The Southeast Industrial Focus Area's Planning Objectives identified in The Fullerton Plan include:

- Retain industrial and employment-generating uses while providing amenities and services that will support the work force, such as recreation, retail, and limited housing opportunities.
- Provide for large parcels and flexible spaces to accommodate a variety of industries over the long term while supporting incubator spaces for new and emerging technologies.
- Encourage new businesses and compatible new uses, while discouraging those that are in conflict. Specifically seek to expand and attract industrial users that would benefit from freeway access, technology clusters, and industrial infrastructure.
- Improve appearance and function through design, including landscaping, pedestrian and transit facilities, and alleyway improvements.

The proposed warehouse use is consistent with the objectives identified in the Southeast Industrial Focus Area. Additionally, consistent with the Southeast Industrial Focus Area, the Project proposes a FAR of 0.53, which is within the 1.0 maximum identified in The Fullerton Plan.

An analysis of the proposed Project's consistency with relevant policies of The Fullerton Plan adopted for the purpose of avoiding or mitigating an environmental effect is provided in **Table 23: General Plan Policy Consistency**. The Project is consistent with The Fullerton Plan.

Table 23: General Plan Policy Consistency

Goal	Consistency Analysis
Chapter 1: Community Development and Design	
P1.11: Support programs, policies and regulations to consider the immediate and surrounding contexts of projects to promote positive design relationships and use compatibility with adjacent built environments and land uses, including the public realm	**Consistent.** As discussed in **Section 4.1: Aesthetics**, the site would be subject to FMC 15.40.040, Site Development Standards, which addresses building exterior design, screening of rooftop equipment, landscape requirements, building height limits, setback requirements, and fences and walls, amongst others. FMC Chapter 15.47, Site Plan Review, requires that the approval of the reviewed site plan occurs only after the proposed Project is confirmed to follow development standards and nearby uses. The proposed Project would be in alignment with this policy.
P1.12: Support projects, programs, policies and regulations to encourage energy and resource efficient practices in site and building design for private and public projects.	**Consistent.** As discussed in **Section 4.6: Energy**, the proposed Project would include a variety of energy saving and renewable energy features, including high-efficiency lighting, solar PV system, provide electric vehicle charging stations, install low flow water fixtures, water-efficient irrigation, and drought tolerant landscaping. Therefore, the Project would be consistent with this policy.
P2.8: Support projects, programs, policies and regulations to respect the local context, including consideration of cultural and historic resources, existing scale and character and development patterns of the surrounding neighborhood or district.	**Consistent.** As previously discussed, the site is identified by the city as Industrial, and the site is zoned as Manufacturing Park (M-P). Nearby sites also fall into these two clearly defined categories. **Section 4.5: Cultural Resources** states that based on a review of the Register of Historic Places, National Historic Landmarks, and the Built Environment Resources Directory, a review of resource databases and repositories did not result in the identification of any present

Table 23: General Plan Policy Consistency	
Goal	**Consistency Analysis**
	cultural resources in the project site. Therefore, the Project would be consistent with this policy.
Chapter 4: Mobility	
P5.16: Support projects, programs, policies and regulations to encourage the development of private and/or public infrastructure facilitating the use of alternative fuel vehicles	**Consistent.** As addressed in **Section 2.3: Project Characteristics**, the project proposes 4 electric vehicle charging stations (EVCS) and 13 electric vehicle capable stalls. Therefore, the proposed project is in alignment with this policy.
Chapter 6: Growth Management	
P7.5: Support projects, programs, policies and regulations to ensure that development is appropriate in scale to current and planned infrastructure capabilities.	**Consistent.** As addressed in **Section 2.3: Project Characteristics**, the Project proposes the demolition of the existing approximately 85,700-square-foot Cedarwoods Business Park and the construction and operation of a new 110,232 square-foot warehouse/distribution facility. The proposed Project is consistent with The Fullerton Plan land use designation and zoning. Further, the Project would generate significant population growth. Therefore, the proposed Project would not require the construction of new or expanded water supply or treatment facilities. The project site currently receives the services necessary and maintains the infrastructure necessary to serve the proposed Project. Therefore, the Project is consistent with this policy.
Chapter 7: Noise	
P8.6: Support projects, programs, policies and regulations to permit uses where the noise level of the surroundings—after taking into account noise insulation features and other control techniques of the use—is not detrimental to the use.	**Consistent.** The Project proposes an industrial use and would not be considered a sensitive receptor. As discussed in **Section 4.13: Noise**, the FMC does not establish noise limits for industrial properties. The noise level of surrounding uses would not affect the proposed Project use. Therefore, the Project would be consistent with this policy.
P8.7: Support projects, programs, policies and regulations to permit uses and/or activities where the noise generated by the use and/or activity is not detrimental or otherwise a nuisance to the surroundings.	**Consistent.** Refer to consistency analysis for P8.6.
Chapter 10: Public Safety	
P17.16: Support programs that foster coordination between the City and local school districts, colleges and universities to assess and mitigate project impacts pertaining to on and off -campus development.	**Consistent.** As addressed in **Section 4.15: Public Services**, the Project would not create a direct demand for public school services as the project proposes non-residential uses that would not generate any school-aged children requiring public education. Further, the Project would not draw a substantial number of new residents to the school districts and therefore would not indirectly generate school-aged students requiring public education. Therefore, the Project would be consistent with this policy.
Chapter 16: Water	
P19.7: Support projects, programs, policies and regulations to encourage water efficient practices	**Consistent.** The Project would include water efficient design features including low flow water fixtures, water-efficient

Table 23: General Plan Policy Consistency	
Goal	**Consistency Analysis**
in site and building design for private and public projects.	irrigation, and drought tolerant landscaping. Therefore, the Project would be consistent with this policy.
P20.6: Construction Impacts. Support projects, programs, policies and regulations to reduce impacts to watersheds and urban runoff caused by private and public construction projects.	**Consistent.** As discussed in **Section 4.10: Hydrology and Water Quality**, The General Permit requires development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) and monitoring plan, which must include erosion-control and sediment-control BMPs that would meet or exceed measures required by the General Permit to control potential construction-related pollutants. Erosion-control BMPs are designed to prevent erosion, whereas sediment controls are designed to trap sediment once it has been mobilized. Project construction activities would also be required to comply with water quality measures included in the City of Fullerton's Water Quality Ordinance (FMC Chapter 12.18, Water Quality Ordinance). The City's Water Quality Ordinance requires compliance with the Orange County Drainage Area Management Plan (DAMP) and any conditions and requirements established by the City in order to meet Federal and State water quality requirements related to storm water runoff. These regulations would require the Project contractor to include BMPs to ensure that the discharge of pollutants from the site would be effectively prohibited and would not cause or contribute to an exceedance of water quality standards or alter water quality during construction. With these measures in place, the Project would be consistent with this policy.
P20.7: Support projects, programs, policies and regulations to reduce impacts to watersheds and urban runoff caused by the design or operation of a site or use.	**Consistent.** As discussed **in Section 4.10: Hydrology and Water Quality**, the proposed Project would be required to submit a Final WQMP to the City for review and compliance with the County's NPDES stormwater permit. The Final WQMP would be required to implement BMPs into the final Project design to address pollutants of concern associated with runoff from the project site. The Project incorporates various BMPs as part of the Project, which include biotreatment, treatment control, non-structural source control, and structural source control BMPs to address water quality conditions associated with the proposed Project. Therefore, the Project would be consistent with this policy.
Chapter 17: Air Quality and Climate Change	
P21.6: Construction Impacts. Support projects, programs, policies and regulations to reduce impacts to air quality caused by private and public construction projects.	**Consistent.** As discussed in **Section 4.3: Air Quality**, Project-related construction activities would include demolition, grading, building construction, and paving, architectural coating, and landscaping. Project construction activities would generate short-term emissions of criteria air pollutants. However, this short term and minor construction would not exceed the SCAQMD's daily emission thresholds at the regional level. In addition, the proposed Project would be subject to compliance with SCAQMD Rules 402, 403, and 1113, which would further reduce specific construction-

Table 23: General Plan Policy Consistency	
Goal	**Consistency Analysis**
	related emissions. Therefore, the Project would be consistent with this policy.
Chapter 18: Integrated Waste Management	
P23.7: Support projects, programs, policies and regulations to consider project level solid waste management needs at the site and building design stages.	**Consistent.** As discussed in **Section 4.19: Utilities and Service Systems**, in accordance with State law and FMC Section 14.06.010, the Project would be required to divert at least 65 percent of the nonhazardous construction and demolition debris from the project site by recycling, reuse, and/or salvage. In addition, the City meets its per capita disposal rate target through diversion programs. The City would continue to implement its diversion programs and require compliance with all federal, State and local statutes and regulations for solid waste, including those identified under the most current CALGreen standards and in compliance with AB 939 and SB 1383. Therefore, the Project would be consistent with this policy.

Zoning. The City of Fullerton Zoning Map identifies the zoning classification on the northern portion of the site as Manufacturing Park with a 100,000-square-foot minimum lot size (MP-100) and Commercial Manufacturing (CM) over the remaining southern portion of the site. Additionally, the entirety of the site has an Emergency Shelter Overlay (ES). The proposed Project would rezone the southern portion of the site to MP-100-ES to allow for the warehouse development. The FMC Chapter 15.40, *Industrial Zone Classifications*, clarifies that M-P zones are established to allow compatible industrial uses in proximity to each other while protecting the public health, safety and welfare through development standards and the site plan review process. It also states that the M-P zone is intended for a wide range of light industrial activities, often based on a multiple-tenant type development. FMC Section 15.40.040, *Site Development Standards*, provides development standards that apply to the M-P zone.

The Project would also be subject to FMC Section 15.40.040, Site Development Standards, which addresses building height limits, setback requirements, and minimum lot area, amongst others, as well as FMC Section 15.40.050, Parking Standards, which specifies parking requirements. Consistent with the proposed MP-100-ES zoning district, the proposed warehouse would have a maximum roof line of approximately 44 feet in height, 91 passenger vehicle parking stalls - including electric vehicle charging and capable stalls, an approximately 21 foot setback from Orangethorpe Avenue, and a total of 19,109 square feet of landscaping, focused near parking lot areas, the warehouse, site perimeter, and driveway entries. As part of the City's Site Plan Review process required under FMC Chapter 15.47, Site Plan Review, the Project site plan would be reviewed and only approved after finding the proposed development, including the uses and the physical design of the development is consistent with the intent and general purposes of the chapter, and would not adversely affect surrounding development in the area. Therefore, the Project would not cause a significant environmental impact due to a conflict with The Fullerton Plan or FMC, or any other land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

4.12 MINERAL RESOURCES

ENVIRONMENTAL IMPACTS	Potentially Significant Issues	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
12. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?				X
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				X

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?

No Impact. The Surface Mining and Reclamation Act of 1975 (SMARA) requires the classification of land into mineral resource zones (MRZs) according to the known or inferred mineral potential of the area. The Fullerton Plan states that the City does not contain any areas designated as MRZs.[62] The Project proposes the demolition of the existing Cedarwoods Business Park and the construction and operation of a warehouse/ distribution facility, which would not establish any use associated with mineral resource extraction. Therefore, the Project would not result in the loss of known mineral resources that would be of value to the region and the residents of the State, and no impact would occur.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. The project site is not identified as a locally important mineral resource recovery site in any local general plan, specific plan, or other land use plan. The proposed Project would not result in the loss of availability of a locally important mineral resource recovery site. The proposed project site is currently urbanized, and no resource recovery sites exist. Therefore, the proposed Project would not result in a loss of availability of known mineral resources, and no impact would occur.

[62] City of Fullerton. (1997). *General Plan*. Retrieved from: https://www.cityoffullerton.com/home/showpublisheddocument/1214/637436205717830000. Accessed July 9, 2025.

4.13 NOISE

ENVIRONMENTAL IMPACTS	Potentially Significant Issues	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
13. NOISE. Would the project result in:				
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?			X	
b) Generation of excessive groundborne vibration or groundborne noise levels?		X		
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?				X

The noise modeling is included in **Appendix I: Noise and Vibration Data,** and the results are summarized below.

Background

The analysis describes sound in terms of amplitude (loudness) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (dB). The decibel scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is in relation to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, the A-weighted decibel scale (dBA) relates noise to human sensitivity. The A-weighted decibel scale provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise, on the other hand, is unwanted sound. A typical noise environment consists of a base of steady ambient noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These can vary from an occasional aircraft or train passing by to virtually continuous noise from traffic on a major highway.

Several rating scales analyze the adverse effects of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise on people is largely dependent on the total acoustical energy content of the noise as well as the time of day when the noise occurs. For example, the equivalent continuous sound level (L_{eq}) is the acoustic energy content of noise for a stated period; therefore, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. The Day-Night Sound level (L_{dn}) is a 24-hour average L_{eq} with a 10 dBA "weighting" added to noise during the hours of 10:00 PM to 7:00 AM to account for noise

sensitivity in the nighttime. The Community Noise Equivalent Level (CNEL) is a 24-hour average L_{eq} with a 10 dBA weighting added to noise during the hours of 10:00 PM to 7:00 AM and an additional 5-dBA weighting during the hours of 7:00 PM to 10:00 PM to account for noise sensitivity in the evening and nighttime.

Existing Setting

The project site is located within an urban environment, surrounded by commercial and industrial uses. The Project vicinity is impacted by various noise sources. Mobile noise sources, especially cars and trucks traveling along Orangethorpe Avenue and South State College Boulevard, are the most common and significant sources of noise in the Project vicinity. The primary sources of stationary noise near the project site are associated with the commercial and industrial uses and include parking lot activity, mechanical equipment (e.g., heating, ventilation, and air conditioning [HVAC] units), idling vehicles, truck deliveries, pedestrians, car radios and music playing, and landscaping equipment. The noise associated with these sources may represent a single-event noise occurrence or short-term noise.

Noise Measurements

To quantify existing ambient noise levels in the Project vicinity, Kimley-Horn conducted three short-term (10-minute) measurements on July 15, 2025; see **Appendix I: Noise Data** for additional details regarding how the ambient noise measurements were taken. The noise measurement sites were selected to be representative of the existing ambient noise levels at the noise-sensitive uses in the vicinity of the project site. The 10-minute daytime measurements were taken between 8:41 AM and 9:28 AM Measurements of L_{eq} are considered representative of the noise levels throughout the day. The average noise levels measured at each location are identified in **Table 24: Existing Noise Measurement Locations and Measurements** and shown on **Figure 11: Noise Monitoring Locations Map**.

Table 24: Existing Noise Measurement Locations and Measurements

Site	Location	Measurement Period	Duration	Daytime Average (dBA L_{eq})
ST-1	Adjacent to 823 Lark Avenue, along South Placentia Avenue	8:41 AM - 8:51 AM	10 minutes	73.1
ST-2	Adjacent to Interface Rehab	8:56 AM - 9:06 AM	10 minutes	71.5
ST-3	Adjacent to Doggi Dogi Pet Spa	9:18 AM - 9:28 AM	10 minutes	61.3

ST = short-term noise measurement
Source: Noise measurements taken by Kimley-Horn and Associates, Inc., July 15, 2025. See **Appendix I** for the noise measurement results.

Figure 11: Noise Measurement Locations Map
Cedarwoods Fullerton Project

Not to scale.

Kimley»Horn

Sensitive Receptors

Noise exposure standards and guidelines for various types of land uses reflect the varying noise sensitivities associated with each of these uses. FMC Section 15.90.030, Noise Standards, defines a sensitive receptor as any private or public school, hospital, or residential care facility for the elderly, and religious institution.[63]

No sensitive receptors in the City of Fullerton have been identified within 1,000 feet of the project site. The City of Placentia General Plan defines a sensitive receptor as residential uses, schools, libraries, hospitals, churches, and parks.[64] The nearest sensitive receptors to the project site within the City of Placentia are residential uses located approximately 765 feet to the southeast and Interface Rehab located approximately 975 feet to the east.[65]

Regulations

State of California Noise Standards

The State of California does not have standards for environmental noise, but the Governor's Office of Land Use and Climate Innovation (Governor's Office) has established general plan guidelines for evaluating the compatibility of various land uses as a function of community noise exposure.[66] The purpose of these guidelines is to maintain acceptable noise levels in a community setting for different land use types. The guidelines rank noise land use compatibility in terms of "normally acceptable," "conditionally acceptable," "normally unacceptable," and "clearly unacceptable" noise levels for various land use types.

In addition, California Government Code Section 65302(f) mandates that the legislative body of each county and city adopt a noise element as part of its comprehensive general plan. The local noise element must recognize the land use compatibility guidelines established by the Governor's Office.

California Code of Regulations, Title 24

The CCR, Title 24: Part 1, Building Standards Administrative Code, and Part 2, California Building Code, codify the State's noise insulation standards. These noise standards apply to new construction in California for the purpose of interior noise compatibility from exterior noise sources.

The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residential buildings, schools, or hospitals, are located near major transportation noise sources, and where such noise sources create an exterior noise level of 65 dBA CNEL or higher. Acoustical studies that accompany building plans must demonstrate that the design of the structure would limit interior noise in habitable rooms to acceptable noise levels. For new residential buildings, schools, and hospitals, the acceptable interior noise limit for new construction is 45 dBA CNEL.

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63 The nearest sensitive receptors are located in the City of Placentia. The distance was measured from the project site property line to the nearest sensitive receptor property line on Google Earth Imagery (2025).

64 City of Placentia. (2019). City of Placentia General Plan, Noise Element. https://www.placentia.org/DocumentCenter/View/8392/8-Noise?bidId=. Accessed September 10, 2025.

65 The nearest sensitive receptors are located in the City of Placentia. The distance was measured from the project site property line to the nearest sensitive receptor property line on Google Earth Imagery (2025).

66 State of California Governor's Office of Planning and Research. (2017). *General Plan Guidelines, Appendix D: Noise Element Guidelines, page 374*. Retrieved from: https://opr.ca.gov/docs/OPR_COMPLETE_7.31.17.pdf. Accessed September 20, 2025.

City of Fullerton

The Fullerton Plan

Adopted May 1, 2012, Chapter 7: Noise of The Fullerton Plan (Fullerton Noise Element) provides guidance for the control of noise and establishes goals and policies to protect residents, workers, and visitors from potentially adverse noise impacts. The primary purpose of The Fullerton Plan Noise Element is to preserve an acceptable noise environment for all types of land uses. The Noise Element defers regulation of temporary, point-source noises such as construction activities to the City's Municipal Code. The following goals and policies from Noise Element are applicable to the Project.

GOAL 8: Protection from the adverse effects of noise.

P8.3 **Consideration of Noise in Land Use Decisions** Support projects, programs, policies and regulations which ensure noise-compatible land use planning recognizing the relative importance of noise sources in order of community impact, the local attitudes towards these sources, and the suburban or urban characteristics of the environment, while identifying noise sensitive uses.

P8.4 **Noise Reduction Measures** Support projects, programs, policies and regulations to control and abate noise generated by stationary sources.

P8.5 **Focus Area Planning** Support projects, programs, policies and regulations to evaluate ways to ensure noise compatible land use planning as part of community-based planning of Focus Areas.

P8.6 **Noise Receptors** Support projects, programs, policies and regulations to permit uses where the noise level of the surroundings—after taking into account noise insulation features and other control techniques of the use—is not detrimental to the use.

P8.7 **Noise Generators** Support projects, programs, policies and regulations to permit uses and/or activities where the noise generated by the use and/or activity is not detrimental or otherwise a nuisance to the surroundings.

The Fullerton Noise Element identifies land use guidelines to reduce future noise and land use incompatibilities. The noise and land use compatibility criteria is provided in **Table 25: Land Use Compatibility for Community Noise Environments**.

Table 25: Land Use Compatibility for Community Noise Environments

Land Use Category	Community Noise Exposure (CNEL)			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential-Low Density, Single-Family, Duplex, Mobile Homes	50 - 60	55 - 70	70 - 75	75 - 85
Residential – Multiple Family	50 - 65	60 - 70	70 - 75	70 - 85
Transient Lodging – Motel, Hotels	50 - 65	60 - 70	70 - 80	80 - 85
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 - 70	60 - 70	70 - 80	80 - 85
Auditoriums, Concert Halls, Amphitheaters	NA	50 - 70	NA	65 - 85

Table 25: Land Use Compatibility for Community Noise Environments				
	Community Noise Exposure (CNEL)			
Land Use Category	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Sports Arenas, Outdoor Spectator Sports	NA	50 -75	NA	70 - 85
Playgrounds, Neighborhood Parks	50 - 70	NA	67.5 – 77.5	72.5 - 85
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 - 70	NA	70 - 80	80 - 85
Office Buildings, Business Commercial and Professional	50 - 70	67.5 – 77.5	75 - 85	NA
Industrial, Manufacturing, Utilities, Agriculture	50 - 75	70 - 80	75 - 85	NA

CNEL = community noise equivalent level; NA = not applicable
Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.
Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features have been included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.
Normally Unacceptable: New construction or development should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features must be included in the design.
Clearly Unacceptable: New construction or development should generally not be undertaken.
Source: Office of Planning and Research, California. (2017). *General Plan Guidelines*; City of Fullerton. (2012). *City of Fullerton General Plan, E: Tables and Exhibits*; and City of Placentia. (2019). *City of Placentia General Plan, Chapter 8: Noise Element.*

City of Fullerton Municipal Code

The following sections of the FMC are applicable to the proposed Project.

Section 15.40.080 Industrial Environmental Controls. Vibration from any machine, operation, or process that can cause noticeable displacement as measured at the property line of the parcel on which the use is located is prohibited.

Section 15.90.030 Noise Standards.

A. The following interior and exterior noise standard presented in **Table 26: City of Fullerton Noise Standards** apply to the Residential Noise Zone. The City does not specify noise level limits for commercial or industrial zones.

Table 26: City of Fullerton Noise Standards		
Noise Area	Allowable Noise Level (dBA L_{eq})	
	7:00 AM to 10:00 PM	10:00 PM to 7:00 AM
Interior	55	45
Exterior	55	50

Source: City of Fullerton. (N.D.) Fullerton Municipal Code Section 15.90.030: Noise Standards.

B. A sensitive use is defined as any private or public school, hospital, or residential care facility for the elderly, and religious institution. It is prohibited to create any noise that causes the noise level at any sensitive use, while the sensitive use is in operation to exceed the noise limits specified for the Residential Noise Zone, notwithstanding the sensitive use may be located outside the Residential Noise Zone.

C. Noise that is classified as being continuous, reoccurring, predictable, or whose operation of noise-generating capability can be stopped or started at a specified time, or exceeds the following is prohibited:

- The noise standard for a cumulative period of more than 30 minutes in any hour;
- The noise standard plus five dBA for a cumulative period of more than 15 minutes but less than 30 minutes in any hour;
- The noise standard plus 10 dBA for a cumulative period of more than five minutes but less than 15 minutes in any hour;
- The noise standard plus 15 dBA for a cumulative period of more than one minute but less than five minutes in any hour; and
- The noise standard plus 20 dBA for a cumulative period of less than one minute in an hour.

D. If the ambient noise level exceeds any of the five noise limit categories listed in Subsection C, the cumulative period applicable to the category shall be increased to reflect the ambient noise level.

Section 15.90.040 Actives Exempt from Standards. Noise from vehicular traffic on public streets is exempt from the noise level standards specified in this chapter.

Section 15.90.050 Activities with Special Provisions. The noise sources associated with construction, repair, remodeling, or grading of property is exempt from the noise levels standards specific by this chapter between the hours of 7:00 AM to 8:00 PM on any day except Sunday or a City-recognized holiday. Air conditioning, refrigeration, and pool equipment must be certified within the noise limits of the Code.

City of Placentia

Although the project site is located in the City of Fullerton, the nearest sensitive receptors are located in the City of Placentia. As such, the City of Placentia noise goals, policies, and standards are included below.

City of Placentia General Plan

Chapter 8: Noise Element of the City of Placentia General Plan (Placentia Noise Element) identifies goals and policies to protect workers, residents, and visitors from potentially adverse noise impacts.

GOAL N - 1 **Reduce noise impacts from transportation noise sources.**

Policy N - 2.1 Land use planning decisions should be guided by the "normally acceptable" and "conditionally acceptable" community noise exposures, as established by the Office of Planning and Research and shown on Table 5 (refer to **Table 25**, above).

Policy N - 2.2 Require noise-reduction techniques and mitigation measures in site planning, architectural design, and construction where new projects do not meet the land use compatibility standards in Table 5 (refer to **Table 25**, above).

Policy N - 2.3 Discourage and, if necessary, prohibit the exposure of noise sensitive land uses to noisy environments. Incorporate noise reduction features during site planning to mitigate anticipated noise impacts on affected noise-sensitive land uses.

Policy N - 2.5 Require proposed development and building projects to demonstrate compliance with the Noise Element and Noise Ordinance prior to project approval. Inform building permit applicants of the relevant sections of the Noise Element and Ordinance.

GOAL N - 3 **Minimize noise spillover from commercial uses into nearby residential neighborhoods.**

Policy N - 3.1 Require adherence to City and State exterior noise requirements, specifying exterior and interior noise levels.

Policy N - 3.2 Use increased setbacks where necessary to ensure noise from new development does not impact adjoining residentially used or zoned property.

Policy N - 3.3 Require that automobile and truck access to commercial properties located adjacent to residential parcels be located at the maximum practical distance from the residential parcel.

Policy N - 3.4 Truck deliveries within the City to commercial and industrial properties abutting residential uses shall fully comply with the City's Noise Ordinance.

Policy N - 3.5 Limit delivery hours for commercial and industrial uses with loading areas or docks fronting, siding, bordering, or gaining access on driveways adjacent to noise-sensitive uses.

Policy N - 3.6 Require adherence to City and State building codes that specify indoor noise levels.

Policy N - 3.7 Incorporate noise considerations into the site plan review process, particularly with regard to parking and loading areas, ingress/egress points and refuse collections areas.

GOAL N - 5 **Develop measures to control objectionable noise impacts.**

Policy N - 5.3 Where possible, resolve existing and potential conflicts between various noise sources and other human activities.

Policy N - 5.4 Require sound attenuation devices on construction equipment.

Policy N - 5.5 Encourage additional sound attenuation measures to reduce noise impacts to sensitive uses.

Policy N - 5.6 Continue to enforce and ensure agency coordination of noise abatement and control measures, particularly within residential neighborhoods and around noise sensitive land uses.

Policy N - 5.7 Require construction activity to comply with City Noise Ordinance. Ensure adequate noise control measures at all construction sites through good sound attenuation practices.

The Placentia Noise Element identifies land use guidelines to reduce future noise and land use incompatibilities. The noise and land use compatibility criteria is provided in **Table 25**, above.

City of Placentia Municipal Code

The following sections of the City of Placentia Municipal Code are applicable to the proposed Project.

Section 23.76.050 Exterior Noise Standards

A. The noise standard presented in **Table 27: City of Placentia Noise Standards** apply to property within the designated noise zone.

Table 27: City of Placentia Noise Standards		
Noise Zone	**Noise Level dB(A)**	**Time Period**
1 – All Residential Property	55	7:00 AM – 10:00 PM
	50	10:00 PM – 7:00 AM
2 – All Commercial Property	65	Anytime
3 – All Industrial Property	70	Anytime
Source: City of Placentia. (N.D.) *City of Placentia Municipal Code, Section 23.76.050: Exterior Noise Standards.*		

B. The noise levels shown in **Table 27** shall be reduced by 5 dB(A) if the offensive noise consists entirely of impact noise, simple tone noise, speech, music, or any combination thereof.

Noise that exceeds the following measured at any residential, commercia, or industrial property is prohibited:

- The noise standard for a cumulative period of more than 30 minutes in any hour;
- The noise standard plus five dBA for a cumulative period of more than 15 minutes but less than 30 minutes in any hour;
- The noise standard plus 10 dBA for a cumulative period of more than five minutes but less than 15 minutes in any hour;
- The noise standard plus 15 dBA for a cumulative period of more than one minute but less than five minutes in any hour; and
- The noise standard plus 20 dBA for a cumulative period of less than one minute in an hour.

C. If the ambient noise level exceeds the first four categories, then the cumulative period for the said category shall be increased to reflect the ambient noise level. If the ambient noise level exceeds the fifth category, then the maximum allowable noise level under said category shall be increased to reflect the maximum ambient noise level.

D. If the noise source and the affected property are within different noise zones, then the noise standard applicable to the affected property shall apply.

Section 23.81.170 Grading, Construction, and Maintenance of Real Property

All grading and initial construction of any real property is permitted only between the hours of 7:00 AM and 7:00 PM Monday through Friday, and 9:00 AM and 6:00 PM on Saturday. All grading and initial construction of any real property is prohibited at any time on Sunday and federal holidays, unless approved by the chief building official or city engineer upon receipt of evidence that an emergency exists which would constitute a hazard to persons or property.

Thresholds of Significance

Construction

The City of Fullerton and City of Placentia have not established a quantitative construction noise standard. For purposes of this analysis, the FTA's threshold of 80 dBA (8-hour L_{eq}) for residential uses and 85 dBA (8-hour L_{eq}) for commercial uses is used to evaluate construction noise impacts.[67] Because a doubling of

[67] Federal Transit Administration. (2018). *Transit Noise and Vibration Impact Assessment Manual, Table 7-3, Page 179.*

traffic is considered to cause a perceptible noise increase of 3-dBA above existing noise conditions, the significance for the off-site traffic noise is assessed based on a doubling of existing traffic conditions.[68]

Operations

The nearest sensitive receptors are located in the City of Placentia and the nearest non-sensitive receptors are located in the City of Fullerton. However, the City has not established stationary noise standards for non-sensitive receptors. Therefore, Project-generated stationary noise levels at sensitive receptors would be subject to the City of Placentia Municipal Code Section 23.76.050, Exterior Noise Standards; refer to **Table 27**. Because a change in noise levels of at least 5-dBA is required before any noticeable change in community response would be expected, an increase of 5-dBA is typically considered a substantial increase for operations.[69] Therefore, the composite operational noise significance is assessed based on the City of Placentia exterior noise standards and a noise level increase threshold of 5-dBA above existing noise conditions. Because a doubling of traffic is considered to cause a perceptible noise increase of 3-dBA above existing noise conditions, the significance for the off-site traffic noise is assessed based on a doubling of existing traffic conditions.[70]

Vibration

The City of Fullerton and City of Placentia have not established a vibration damage standard. For purposes of this analysis, the building vibration threshold from the FTA *Transit Noise and Vibration Assessment Manual* and the human annoyance vibration threshold from the California Department of Transportation (Caltrans) *Transportation and Construction Vibration Manual* are used as the significance thresholds. The FTA guidance state that reinforced-concrete, steel, or timber buildings can withstand vibration levels up to 0.5 inch-per-second peak particle velocity (PPV) and not experience vibration damage. The Caltrans guidance identifies the vibration threshold for human annoyance when vibrations are considered annoying by people subjected to continuous vibrations as 0.2 inch-per-second PPV.

Methodology

Construction

Construction noise levels were based on typical noise levels generated by construction equipment published by the FTA and FHWA. Construction noise is assessed in dBA L_{eq}. This unit is appropriate because L_{eq} can be used to describe the noise level from the operation of each piece of equipment separately, and the levels can be combined to represent the noise level from all equipment operating concurrently during a given period.

Construction noise was modeled using the FHWA Roadway Construction Noise Model (RCNM). Reference noise levels are used to estimate operational noise levels at nearby sensitive receptors based on a standard noise attenuation rate of 6 dB per doubling of distance (line-of-sight method of sound attenuation for point sources of noise). Noise level estimates do not account for the presence of intervening structures or topography, which may reduce noise levels at receptor locations. Therefore, the noise levels presented herein represent a conservative, reasonable worst-case estimate of actual temporary construction noise.

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[68] California Department of Transportation. (2017). *Technical Noise Supplement to the Traffic Noise Analysis Protocol*

[69] Compiled from California Department of Transportation. (2017). *Technical Noise Supplement to the Traffic Noise Analysis Protocol* and Federal Highway Administration. (2017). *Noise Fundamentals*.

[70] California Department of Transportation. (2017). *Technical Noise Supplement to the Traffic Noise Analysis Protocol*

Operations

The analysis of the Project noise environment is based on noise prediction modeling and empirical observations. Reference noise level data are used to estimate the Project operational noise impacts from stationary sources. Noise levels were collected from published sources from similar types of activities and used to estimate noise levels expected with the Project's stationary sources. The reference noise levels are used to represent a worst-case noise environment as noise level from stationary sources can vary throughout the day.

Vibration

Ground-borne vibration levels associated with construction activities for the Project were evaluated utilizing typical ground-borne vibration levels associated with construction equipment, obtained from FTA published data for construction equipment. Potential ground-borne vibration impacts related to building/structure damage and interference with existing sensitive operations were evaluated, considering the distance from construction activities to nearby land uses and typically applied criteria for structural damage.

Construction vibration levels were calculated using the following formula:

$$PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$$

where: PPV_{equip} = the peak particle velocity in inch-per-second of the equipment adjusted for the distance

PPV_{ref} = the reference vibration level in inch-per-second from Table 7-4 of the Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, 2018.

D = the distance from the equipment to the receiver

Impact Analysis

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?

Less Than Significant Impact: On-Site Construction Noise. Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., land clearing, grading, excavation, paving). Noise generated by construction equipment, including earth movers, material handlers, and portable generators, can reach high levels. During construction, exterior noise levels could affect the commercial and industrial receptors near the construction site.

Project construction would occur over a 13-month period. Project construction activities would include demolition, site preparation, grading, infrastructure improvements, building construction, paving, and architectural coating applications.[71]

Such activities may require graders, and tractors/ loaders/ backhoes during site preparation; graders, dozers, and tractors/loaders/backhoes during grading; cranes, forklifts, and tractors/ loaders/ backhoes during building construction; pavers, rollers, mixers, and tractors/ loaders/ backhoes during paving; and air compressors during architectural coating applications. Typical

[71] Although not proposed, the modeled Project construction equipment conservatively accounts for the full-width grind and overlay improvements along Cypress Way.

operating cycles for these types of construction equipment may involve 1 or 2 minutes of full power operation followed by 3 to 4 minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts).

The site preparation and grading phases of Project construction tend to be the shortest in duration and create the highest construction noise levels due to the operation of heavy equipment required to complete these activities. It should be noted that only a limited amount of equipment can operate near a given location at a particular time. Typical noise levels associated with individual construction equipment are listed in **Table 28: Typical Construction Noise Levels**. It should be noted that the noise level values shown in **Table 28** are for the equipment when operating at full power 50 feet from the sensitive receptor, without taking into account any intervening structures or topography that may reduce noise levels.

Table 28: Typical Construction Noise Levels

Equipment	Typical Noise Level (dBA) at 50 feet from Source
Air Compressor	80
Backhoe	80
Compactor	82
Concrete Mixer	85
Concrete Pump	82
Concrete Vibrator	76
Crane, Mobile	83
Dozer	85
Generator	82
Grader	85
Impact Wrench	85
Jack Hammer	88
Loader	80
Paver	85
Pneumatic Tool	85
Pump	77
Roller	85
Saw	76
Scraper	85
Shovel	82
Truck	84

Source: Federal Transit Administration. (2018). *Transit Noise and Vibration Impact Assessment Manual.*

Daytime construction noise is not typically a concern for human health and is a common occurrence within the urban environment. The nearest non-sensitive receptors to the project site are commercial uses located adjacent to the west, within the City of Fullerton. Pursuant to the City's Municipal Code Section 15.90.050, construction noise is permitted between the hours of 7:00 AM and 8:00 PM any day, except for Sundays and City-recognized holidays. The nearest

sensitive receptors to the project site are residential uses located approximately 765 feet to the southeast and Interface Rehab located approximately 975 feet to the east, within the City of Placentia. The City of Placentia Municipal Code Section 23.81.170 permits grading and construction between the hours of 7:00 AM and 7:00 PM Monday through Friday, and 9:00 AM and 6:00 PM on Saturday. However, the Project does not propose construction in the City of Placentia and would therefore not be subject to the allowable hours of construction. The City for Fullerton and City of Placentia have not established quantitative construction noise standards. As such, this analysis conservatively uses the FTA's threshold of 80 dBA (8-hour L_{eq}) for residential uses and 85 dBA (8-hour L_{eq}) for commercial uses.[72]

The FHWA's RCNM was used to calculate noise levels at the nearest commercial receptor and sensitive receptors. Noise levels at other receptors surrounding the project site would be located further away and would experience lower construction noise levels than the modeled receptors. Noise levels were based on the equipment used, distance to the nearest receptor, and acoustical use factor for equipment. When calculating construction noise, the anticipated construction equipment is assumed to operate at staggered distances throughout the construction area. This methodology accounts for equipment operating throughout the construction area and not at a fixed location for extended periods of time.[73] See **Appendix I** for more information regarding the construction assumptions used in this analysis.

The noise levels calculated in **Table 29: Project Construction Noise Levels** summarizes the exterior construction noise attributable to the Project without accounting for attenuation from existing physical barriers. As indicated on the table, maximum construction noise level would be 84.0 dBA L_{eq} at the nearest receptor (commercial), 65.8 dBA L_{eq} at the nearest residential use, and 63.6 dBA L_{eq} at Interface Rehab. As such, the Project would not exceed the FTA's construction noise thresholds for residential or commercial uses. Additionally, The Project would comply with City's allowable hours of construction, which are required in recognition that construction activities undertaken during daytime hours are a typical part of living in an urban environment and do not cause a significant impact. Therefore, impacts in regard to on-site construction noise would be less than significant.

[72] Federal Transit Administration. (2018). *Transit Noise and Vibration Impact Assessment Manual, Table 7-3, Page 179.*
[73] Ibid.

Table 29: Project Construction Noise Levels

Construction Phase	Receptor	Direction	Project Construction Noise Level (dBA L_{eq})[1]	Noise Threshold (dBA L_{eq})[2]	Exceeded?
Individual Construction Phase					
Demolition[3]	Commercial	West	80.5	85	**No**
	Residential	Southeast	61.3	80	**No**
	Interface Rehab	East	59.0	85	**No**
Site Preparation[3]	Commercial	West	79.4	85	**No**
	Residential	Southeast	61.8	80	**No**
	Interface Rehab	East	59.6	85	**No**
Grading[3]	Commercial	West	80.0	85	**No**
	Residential	Southeast	62.0	80	**No**
	Interface Rehab	East	59.7	85	**No**
Infrastructure Improvements[3]	Commercial	West	80.5	85	**No**
	Residential	Southeast	60.5	80	**No**
	Interface Rehab	East	58.1	85	**No**
Building Construction[3]	Commercial	West	81.4	85	**No**
	Residential	Southeast	63.8	80	**No**
	Interface Rehab	East	61.6	85	**No**
Paving[3]	Commercial	West	80.3	85	**No**
	Residential	Southeast	61.1	80	**No**
	Interface Rehab	East	58.8	85	**No**
Architectural Coating[3]	Commercial	East	70.8	85	**No**
	Residential	West	49.2	80	**No**
	Interface Rehab	Southeast	46.8	85	**No**
Off-site Improvements[4]	Commercial	South[5]	83.3	85	**No**
	Residential	East	54.8	80	**No**
	Interface Rehab	Southeast	54.5	85	**No**
Overlapping Construction Phase					
Infrastructure Improvements + Building Construction	Commercial	West	84.0	85	**No**
	Residential	Southeast	65.5	80	**No**
	Interface Rehab	East	63.2	85	**No**
Building Construction + Paving	Commercial	West	84.0	85	**No**
	Residential	Southeast	65.7	80	**No**
	Interface Rehab	East	63.4	85	**No**

[1] The equipment is assumed to operate at staggered distances throughout the construction area.
[2] Thresholds are from the FTA *Transit Noise and Vibration Impact Assessment Manual* (2018).
[3] The construction area is considered to be the project site.
[4] Although not proposed, the off-site improvements conservatively account for the full-width grind and overlay improvements along Cypress Way.
[5] The nearest commercial receptors to the off-site Cypress Way grind and overlay improvements are located adjacent to the south of Cypress Way.

Source: Federal Highway Administration. (2006). *Roadway Construction Noise Model*. Refer to **Appendix I** for noise modeling results.

Less Than Significant Impact: Off-Site Mobile Construction Noise. In addition to on-site construction noise, the Project would generate mobile-source noise from haul and delivery trucks and construction workers traveling to and from the project site during Project construction using Orangethorpe Avenue and South State College Boulevard. Project-generated trips would be temporary and cease with the end of construction.

Because of the logarithmic nature of noise levels, a doubling of the traffic volumes would result in a noise level increase of 3 dBA, which is considered to be readily noticeable.[74] According to annual average daily traffic (AADT) data provided by Replica HQ, Orangethorpe Avenue has an AADT of 12,869 and South State College Boulevard has an AADT of 20,553.[75] According to modeling assumptions in **Section 4.3: Air Quality**, the construction phases with the highest assumed number of trucks would be demolition, when it is assumed, there would be up to 102 daily trips accessing the project site. As Project construction would not double the existing traffic volumes on Orangethorpe Avenue or South State College Boulevard, the proposed Project would not generate enough traffic to result in a noticeable 3-dBA increase in ambient noise levels.

Large trucks would deliver building materials, remove waste materials, and depending on the final earthwork quantities, import or export soil to and from off-site locations. These large trucks would generate noise from the engine acceleration, braking, and loading and unloading. The State establishes noise limits for vehicles licensed to operate on public roads using a pass-by test procedure. Pass-by noise refers to the noise level produced by an individual vehicle as it travels past a fixed location. The pass-by procedure measures the total noise generated by a moving vehicle with a microphone. When the vehicle reaches the microphone, the vehicle is at full throttle acceleration at an engine speed calculated for its displacement. The State pass-by standard for heavy trucks is consistent with the federal limit of 80 dB. The State pass-by standard for light trucks and passenger cars (less than 4.5 tons gross vehicle rating) is also 80 dB at 15 meters from the centerline. According to the FHWA, dump trucks typically generate noise levels of 76 dBA and flatbed trucks typically generate noise levels of 74 dBA, at a distance of 50 feet from the truck.[76] As such, noise from truck trips associated with the proposed project would not exceed FTA threshold levels of 90 dBA (one-hour L_{eq}) or 80 dBA (eight-hour L_{eq}). Impacts associated with Project-generated mobile traffic would be less than significant.

Less Than Significant Impact: On-Site Operational Noise. The major on-site noise sources associated with the Project include mechanical equipment (e.g., HVAC equipment), loading dock activities (i.e., slow moving trucks on the site, maneuvering and idling trucks, air brakes, back-up alarms, equipment noise), trash and recycling collection, back-up beepers, parking lot activity (i.e., car door slamming, car radios, engine start-up, and car pass-by), and an emergency fire pump. Operational noise associated with the Project would be similar to existing conditions on-site and at the adjacent uses.

As noted above in the *Thresholds of Significance* section, the nearest sensitive receptors are located in the City of Placentia and the nearest non-sensitive receptors are located in the City of Fullerton. However, the City of Fullerton has not established stationary noise standards for non-

[74] According to the California Department of Transportation, *Technical Noise Supplement to Traffic Noise Analysis Protocol* (September 2013), it takes a doubling of traffic to create a noticeable (i.e., 3-dBA) noise increase.

[75] ReplicaHQ. (2024). Replica Annual Average Daily Traffic (AADT) Data. https://www.replicahq.com/aadt. Accessed July 3, 2025.

[76] Federal Highway Administration, *Roadway Construction Noise Model*, 2006.

sensitive receptors. Therefore, Project-generated stationary noise was not analyzed at the nearest non-sensitive receptors, adjacent to the project site. The following analysis addresses Project-generated stationary noise at the nearest sensitive receptors in the City of Placentia.

- **Mechanical Equipment.** Potential stationary noise sources related to long-term Project operations would include mechanical equipment (e.g., HVAC equipment) located on the roof of the proposed building. It is conservatively assumed the mechanical equipment would be located on the building rooftop nearest the sensitive receptor and would not be screened by architectural features. Mechanical equipment typically generates noise levels of approximately 52 dBA at 50 feet.[77] The nearest sensitive receptors are residential uses located approximately 815 feet to the southeast and Interface Rehab located approximately 1,076 feet to the east of the mechanical equipment. The mechanical equipment noise levels at the nearest residential use would be 27.8 dBA L_{eq} and would not exceed the City of Placentia residential daytime (55 dBA) or nighttime (50 dBA) noise standard. The mechanical equipment noise levels at Interface Rehab would be 25.3 dBA L_{eq} and would not exceed the City of Placentia commercial noise standard (65 dBA). Impacts would be less than significant.
- **Truck and Loading Dock Activities.** During loading and unloading activities, noise would be generated by the trucks' diesel engines, exhaust systems, and brakes during low gear shifting' braking activities; backing up toward the docks; dropping down the dock ramps; and maneuvering away from the docks. The loading docks would be located on the western side of the proposed warehouse building; refer to **Figure 7**. Typically, heavy truck and loading dock operations generate a noise level of 64.4 dBA at a distance of 50 feet.[78] The nearest sensitive receptors are Interface Rehab located approximately 1,030 feet to the east and residential uses located approximately 1,273 feet to the southeast of the loading dock area. The loading and unloading noise levels at Interface Rehab would be 38.1 dBA L_{eq} and would not exceed the City of Placentia commercial noise standard (65 dBA). The loading and unloading noise levels at the nearest residential use would be 36.3 dBA L_{eq} and would not exceed the City of Placentia residential daytime (55 dBA) or nighttime (50 dBA) noise standard. Impacts would be less than significant.
- **Back-up Alarms.** Medium and heavy-duty trucks reversing into loading docks would produce noise from back-up alarms (also known as back-up beepers). Back-up beepers produce a typical volume of 97 dBA at 3.28 feet from the source.[79] According to Table 1: Trip Generation in **Appendix L**, the Project would generate three truck trips to the project site during peak hours. Therefore, this analysis conservatively assumes the three trucks would simultaneously utilize back-up alarms within the loading dock area. The nearest sensitive receptors are Interface Rehab located approximately 1,030 feet to the east and residential uses located approximately 1,273 feet to the southeast of the loading dock area. The back-up beeper noise levels at Interface Rehab would be 25.3 dBA L_{eq} and would not exceed the City of Placentia commercial noise standard (65 dBA). The back-up beeper noise levels at the nearest

[77] Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden. (2010). Noise Navigator Sound Level Database with Over 1700 Measurement Values.
[78] Loading dock reference noise level measurements conducted by Kimley-Horn on December 18, 2018.
[79] David Holzman. (2011). *Vehicle Motion Alarms: Necessity, Noise Pollution, or Both?* https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3018517/. Accessed September 10, 2025.

residential use would be 23.5 dBA L_{eq} and would not exceed the City of Placentia residential daytime (55 dBA) or nighttime (50 dBA) noise standard. Impacts would be less than significant.

- **Parking.** Traffic associated with parking lots is typically not of sufficient volume to exceed community noise standards, which are based on a time-averaged scale such as the L_{eq} or CNEL scale. The instantaneous maximum sound levels generated by a car door slamming, engine starting up, and car pass-bys range from 53 to 61 dBA.[80] Conversations in parking areas may also be an annoyance to adjacent sensitive receptors. Sound levels of speech typically range from 33 dBA at 50 feet for normal speech to 50 dBA at 50 feet for very loud speech.[81] It should be noted that parking lot noises are instantaneous noise levels compared to noise standards in the hourly L_{eq} or 24-hour CNEL metrics, which are averaged over the entire duration of a time period. As a result, actual noise levels over time resulting from parking lot activities would be far lower than the reference levels identified above.

  For the purpose of providing a conservative, quantitative estimate of the noise levels that would be generated from the vehicles entering and exiting the parking lot, the methodology recommended by FTA for the general assessment of stationary transit noise sources is used. Using the methodology, the Project's peak hourly noise level that would be generated by the on-site parking levels was estimated using the following FTA equation for a parking lot:

  $$L_{eq(h)} = SEL_{ref} + 10 \log (NA/1{,}000) - 35.6$$

  Where:

  $L_{eq(h)}$ = hourly L_{eq} noise level at 50 feet

  SEL_{ref} = reference noise level for stationary noise source represented in sound exposure level (SEL) at 50 feet

  NA = number of automobiles per hour

  35.6 is a constant in the formula, calculated as 10 times the logarithm of the number of seconds in an hour.

Based on Table 1 in **Appendix L**, the Project would generate approximately 212 daily trips, with 40 peak hour trips. Using the FTA's reference noise level of 92 dBA SEL[82] at 50 feet from the noise source, the Project's highest peak hour vehicle trips would generate noise levels of approximately 42.4 dBA L_{eq} at 50 feet from the parking lot. The nearest sensitive receptors are Interface Rehab located approximately 1,050 feet to the east and residential uses located approximately 1,058 feet to the southwest from the parking area. The parking noise levels at Interface Rehab would be 15.9 dBA L_{eq} and would not exceed the City of Placentia commercial noise standard (65 dBA). The parking noise levels at the nearest residential use would be 16.0 dBA L_{eq} and would not exceed the City of Placentia residential daytime (55 dBA) or nighttime (50 dBA) noise standard.

[80] Kariel, H. G. (1991). *Noise in Rural Recreational Environments, Canadian Acoustics 19(5), 3-10.*
[81] Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden. (2015). *Noise Navigator Sound Level Database with Over 1700 Measurement Values.*
[82] Federal Transit Administration. (2018). *Transit Noise and Vibration Impact Assessment Manual.*

- **Emergency Fire Pump.** The Project would include an emergency fire pump located in an external pump house building located along the western project boundary. The emergency fire pump equipment would be entirely enclosed within the building and would not result in any measurable noise levels within the Project vicinity. Impacts would be less than significant.

Composite Noise Levels. An evaluation of the Project's composite noise levels, including all on-site Project-related noise sources plus the existing ambient noise level, was conducted to identify the potential maximum Project-related noise level increase that may occur at the nearest sensitive receptors. On-site noise-generating sources associated with the Project would include mechanical equipment, loading dock activities, truck back-up alarms, and parking activities. It is conservatively assumed that operational noise sources at the project site would occur in a constant, simultaneous manner. However, noise sources would occur intermittently throughout the day (except for the HVAC which may operate in a steady-state manner). This analysis considers an exceedance of the noise standard at a sensitive receptor and a 5-dBA increase in noise levels over the existing ambient noise environment as the significance criterion. **Table 30: Composite Noise Levels** presents the composite noise level from the on-site Project-related noise sources.

Table 30: Composite Noise Levels

Noise Source	Noise Level at Sensitive Receptor (dBA)	Daytime/ Nighttime Noise Standard (dBA)[1]	Ambient + Project Noise Level (dBA)[2]	Incremental Increase (dBA)	Incremental Increase Threshold[3]	Significant?[4]
Residential Uses						
Mechanical Equipment	27.8	55/50	-	-	-	No
Truck Loading	36.3	55/50	-	-	-	No
Back-up Beeper	23.5	55/50	-	-	-	No
Parking	15.9	55/50	-	-	-	No
Combined[5]	37.1	55/50	73.1	0.0	5.0	No
Interface Rehab						
Mechanical Equipment	25.3	65/65	-	-	-	No
Truck Loading	38.1	65/65	-	-	-	No
Back-up Beeper	25.3	65/65	-	-	-	No
Parking	16.0	65/65	-	-	-	No
Combined[5]	38.6	65/65	71.5	0.0	5.0	No

[1] As the nearest sensitive receptors are located in the City of Placentia, the noise standards from the City of Placentia Municipal Code, Section 23.76.050: Exterior Noise Standards, are presented in this table.
[2] Ambient noise measurements were taken by Kimley-Horn and Associates on July 15, 2025, and are shown in **Table 1**. ST-1 (73.1 dBA) is representative of the residential uses and ST-2 (71.5 dBA) is representative of Interface Rehab.
[3] This analysis considers an exceedance of the noise standard at a sensitive receptor and a 5-dBA increase in noise levels over the existing ambient noise environment as the significance criterion.
[4] An exceedance of the noise standard by the individual operational noise sources is considered to be significant. An exceedance of the noise standard and 5-dBA incremental noise increase by the combined operational noise sources is considered to be significant.
[5] Noise levels for all operational sources were logarithmically added together and conservatively assumed to operate in a simultaneous, constant manner.
Refer to **Appendix I** for noise modeling results.

As shown in **Table 30**, project-generated composite noise levels would not exceed either the City of Placentia noise standards or the 5-dBA ambient increase threshold at the nearest sensitive receptors. Impacts would be less than significant.

Less Than Significant Impact: Mobile Traffic Noise. Project implementation would result in an increase in traffic trips along roadways near the project site. In general, a 3-dBA increase in traffic noise is barely perceptible to people, while a 5-dBA increase is readily noticeable. Traffic volumes on area roadways would have to approximately double for the resulting traffic noise levels to generate a barely perceptible 3-dBA increase.[83] According to the AADT data provided by Replica HQ, Orangethorpe Avenue has an AADT of 12,869 and South State College Boulevard has an AADT of 20,553.[84] Based on Table 1 in **Appendix L**, Project implementation would result in a net decrease of 422 total daily trips, which would reduce the existing traffic noise levels along Orangethorpe Avenue and South State College Boulevard. However, this analysis conservatively assumes the Project would generate 212 new daily trips (refer to Table 1 in **Appendix L**) along roadways within vicinity of the project site. As Project operations would not double the existing traffic volumes on Orangethorpe Avenue or South State College Boulevard, the proposed Project would not generate enough traffic to result in a noticeable 3-dBA increase in ambient noise levels. Impacts associated with Project-generated mobile traffic would be less than significant.

As discussed above, the proposed Project would not generate substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project and a less than significant impact would occur.

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

Less Than Significant with Mitigation Incorporated: Construction Vibration. Increases in groundborne vibration levels attributable to the Project would be primarily associated with short-term construction-related activities. Project construction would have the potential to result in varying degrees of temporary groundborne vibration, depending on the specific construction equipment used and the operations involved. Ground vibration generated by construction equipment spreads through the ground and diminishes in magnitude as distance from the source increases. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Groundborne vibrations from construction activities rarely reach levels that damage structures.

The FTA has published standard vibration velocities for construction equipment operations. The types of construction vibration impacts include human annoyance and building damage. Building damage can be cosmetic or structural. Ordinary buildings that are not particularly fragile would not experience any cosmetic damage (e.g., plaster cracks) at distances beyond 30 feet. This distance can vary substantially depending on the soil composition and the underground geological layer between the vibration source and the receiver. In addition, not all buildings respond similarly to vibration generated by construction equipment. For example, for a building that is constructed

[83] According to the California Department of Transportation, *Technical Noise Supplement to Traffic Noise Analysis Protocol* (September 2013), it takes a doubling of traffic to create a noticeable (i.e., 3-dBA) noise increase.

[84] ReplicaHQ. (2024). Replica Annual Average Daily Traffic (AADT) Data. Retrieved from: https://www.replicahq.com/aadt. Accessed July 3, 2025.

with reinforced concrete with no plaster, the FTA guidelines show that a vibration level of up to 0.5 inch-per-second is considered safe and would not result in any construction vibration damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. This evaluation uses the FTA architectural damage criterion for continuous vibrations at reinforced-concrete, steel, or timber buildings of 0.5 inch-per-second PPV and human annoyance criterion of 0.2 inch-per-second PPV in accordance with Caltrans guidance.[85]

The Project would use large bulldozers, loaded trucks, small bulldozers, and vibratory rollers during Project construction. **Table 31: Typical Construction Equipment Vibration Levels** includes vibration levels at the reference distance (25 feet), as well as a distance range for typical construction equipment.

Table 31: Typical Construction Equipment Vibration Levels

Equipment	Peak Particle Velocity (inch-per-second)[1]				
	25 Feet	5 Feet	8 feet	15 feet	765 feet
Vibratory Roller	0.21	2.348	1.160	0.452	0.001
Large Bulldozer	0.089	0.995	0.492	0.191	0.001
Loaded Trucks	0.076	0.850	0.420	0.164	0.000
Small Bulldozer	0.003	0.034	0.017	0.006	0.000

[1] Calculated using the following formula: $PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$, where: PPV_{equip} = the peak particle velocity in in/sec of the equipment adjusted for the distance; PPV_{ref} = the reference vibration level in in/sec from Table 7-4 of the Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, 2018; D = the distance from the equipment to the receiver.

Source: Federal Transit Administration. (2018). *Transit Noise and Vibration Impact Assessment Manual.*

On-site construction activities are anticipated to occur up to the construction area boundary. Therefore, the nearest structure (i.e., commercial building) would be located approximately 5 feet to the west of the project site property line. As indicated in **Table 31**, vibration velocities from typical heavy construction equipment operations that would be used during Project construction range from 0.034 to 2.348 inch-per-second PPV at 5 feet from the source of activity. Therefore, Project construction groundborne vibration would exceed the structural damage criterion of 0.5 inch-per-second PPV at the nearest building. Mitigation Measure (MM) NOI-1 would be required to reduce vibration impacts to a less than significant level. MM NOI-1 would require a buffer distance from heavy equipment operation adjacent to the existing commercial buildings to ensure groundborne vibration generated by Project construction activities would not exceed the structural damage criterion of 0.5 inch-per-second PPV.

Although not proposed by the Applicant, this analysis conservatively assumes the Project would include off-site improvements consisting of full-width grind and overlay activities along Cypress Way should such improvements be required by the City as a condition of approval. Such activities would occur up to the curb along Cypress Way and as close as 15 feet from the nearest structures (i.e., commercial buildings). At this distance, groundborne vibration from vibratory rollers could reach 0.452 inch-per-second PPV. Therefore, groundborne vibration would not exceed the structural damage criterion of 0.5 inch-per-second PPV; refer to **Table 31**.

[85] California Department of Transportation. (2013). *Transportation and Construction Vibration Guidance Manual, Table 20.*

The nearest sensitive receptor would be located 765 feet to the southeast of the project site property line. As identified in **Table 31**, vibration velocities from typical heavy construction equipment operations at 765 feet from the source of activity would be less than 0.001 inch-per-second PPV and would not exceed the human annoyance criterion of 0.2 inch-per-second PPV. Impacts would be less than significant with implementation of MM NOI-1.

Less Than Significant Impact: Operational Vibration. With respect to vibration-generating activities, Project operations would primarily involve truck loading and unloading activities. According to the FTA's *Transit Noise and Vibration Impact Assessment*, trucks such as delivery trucks, refuse collection trucks, and occasional moving trucks rarely create vibration levels that exceed 70 VdB (equivalent to 0.012 inch-per-second PPV) when they are on roadways.[86] Furthermore, these movements would generally be low-speed (i.e., less than 15 miles per hour) and would occur over new, smooth surfaces.

For perspective, Caltrans has studied the effects of propagation of vehicle vibration on sensitive land uses and notes that "heavy trucks, and quite frequently buses, generate the highest earthborn vibrations of normal traffic." Caltrans further notes that the highest traffic-generated vibrations are along freeways and state routes. Their study finds that "vibrations measured on freeway shoulders (five meters from the centerline of the nearest lane) have never exceeded 0.08 in/sec, with the worst combinations of heavy trucks and poor roadway conditions (while such trucks were moving at freeway speeds). This level coincides with the maximum recommended safe level for ruins and ancient monuments (and historic buildings)".[87]

Since the truck movements associated with the Project would be at low speed (not at freeway speeds) and would be over smooth surfaces (not under poor roadway conditions), Project-related vibration associated with truck activity would not result in excessive groundborne vibrations. In addition, there are no sources of substantial groundborne vibration associated with the Project, such as rail or subways. The Project would not create or cause any vibration impacts due to operations. 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?

No Impact. The project site is located approximately 5.0 miles to the east of the Fullerton Municipal Airport. The project site is not located within an airport land use plan, nor is it located within two miles of a private or public airport, or within the vicinity of a private airstrip. Therefore, the Project would not expose people working at the project site to excessive airport- or airstrip-related noise levels, and no impact would occur.

[86] California Department of Transportation. (2013). *Transportation and Construction Vibration Guidance Manual, Table 20.*

[87] California Department of Transportation. (2013). Technical Noise Supplement to the Traffic Noise Analysis Protocol ("TeNS").

Mitigation Measures

MM NOI-1 **On-Site Construction Vibration Control**. The following measure shall be incorporated on all grading and building plans and specifications subject to approval of the City's Building and Safety Division prior to issuance of a grading permit:

- The developer shall ensure construction equipment will not approach the construction buffer zone adjacent to the commercial building (i.e., 2443 East Orangethorpe Avenue) along portions of the Project's western project site boundary. The buffer zone shall be tiered based on distances established in **Table 31: Typical Construction Equipment Vibration Levels**. Loaded trucks and large bulldozers shall not operate within 8 feet of the commercial building, and vibratory rollers shall not operate within 15 feet of the commercial building.

This mitigation measure only applies to on-site construction activities.

4.14 POPULATION AND HOUSING

ENVIRONMENTAL IMPACTS	Potentially Significant Issues	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
14. POPULATION AND HOUSING. Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			X	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. As described above, the project site is designated Industrial (I) and located within the Southwest Industrial Focus Area. The project site is currently developed and surrounded by existing development. The site does not contain any housing. The Project proposes to remove the existing 85,700 square-feet of industrial and commercial uses and develop a new 110,232 square-foot warehouse/distribution facility, which would be compatible with the Industrial (I) designation and Southwest Industrial Focus Area, as described in The Fullerton Plan.

Employment opportunities would be provided both during the construction of the Project and once the Project is operational. The number of temporary construction jobs that would be created is unknown. For the purpose of this analysis regarding long-term employment opportunities, the proposed Project would employ approximately 113 employees, based on an employment generation factor of one employee per 979 sf of warehouse use (110,232 sf/979 sf = 112.6, rounded up to 113).[88] It is assumed the new jobs could be filled by local residents who already reside in or near the City, as employment-generating uses currently occur on the site. The proposed Project is consistent with the existing Industrial (I) land use designation and therefore would be within the population projections anticipated and planned for in The Fullerton Plan. Therefore, the Project would not induce substantial unplanned population growth in the area. Additionally, the Project does not include the extension of roads or other infrastructure to unserved areas, which could induce indirect growth. Therefore, the proposed Project would not result in direct or indirect substantial unplanned growth, and a less than significant impact would occur.

[88] Natelson Company, Inc. 2001. *Employment Density Study Summary Report Prepared for SCAG, Table 6A.*

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The project site does not contain any existing housing, and no housing would be removed to accommodate the Project. Therefore, the proposed Project would not displace existing people or housing, and no impact would occur.

4.15 PUBLIC SERVICES

ENVIRONMENTAL IMPACTS	Potentially Significant Issues	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
15. PUBLIC SERVICES. Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i) Fire protection?			X	
ii) Police protection?			X	
iii) Schools?			X	
iv) Parks?			X	
v) Other public facilities?			X	

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

i) Fire protection?

Less than Significant Impact. The Fullerton Fire Department provides fire protection and emergency medical response services for the City, inclusive of the project site which is currently developed as a business park. Additionally, Fullerton is part of a mutual aid agreement with all Orange County Fire agencies to improve emergency response efforts. The nearest fire station is Fire Department Station #3, located at 700 South Acacia Avenue, approximately 1.0 mile northwest of the project site. The Fire Department operates a fleet of five Fire Engines, three Reserve Fire Engines, one Mobile EOC Command Trailor, one Reserve Fire Truck, one Utility Task Vehicle, one 2020 BME Type 3 Wildland Engine under OES 1313 (Office of Emergency Services), and one battalion comprised of one Battalion Chief supervising 24 on-duty Firefighters[89] As described above in **Section 4.14: Population and Housing**, the Project would not result in permanent population growth and would only incrementally increase the demand for fire protection and

89 City of Fullerton, *Fire Station Locations & Apparatus*, available at: https://www.cityoffullerton.com/government/departments/fire/about-us/fire-station-locations-apparatus, accessed July 30, 2025.

emergency medical services in the area. The proposed facility is estimated to have approximately 113 employees. The forecast employment growth and increased demand for services would not exceed projections and anticipated public service needs identified in The Fullerton Plan. Additionally, the incremental increase in population as a result of the Project would not require the construction of new or the alteration of existing fire protection facilities to maintain an adequate level of service to the area. Therefore, no physical impacts associated with fire protection services and facilities would occur.

The Fire Prevention Division (Fire Prevention) of the Fire Department serves to protect the citizens of Fullerton from hazards of fire or other dangerous conditions in existing structures and premises, while also providing safety and assistance to firefighters before and during emergency events. Fire Prevention is responsible for promoting public awareness of fire and life safety and enforcing the California Fire Code (CFC), the California Code of Regulations (CCR), and the California Health and Safety Code. The Fire Department would review and conditionally approve proposed project site plans to ensure fire prevention and suppression measures, fire hydrants and sprinkler systems, emergency access, and other similar requirements are met. The proposed Project would adhere to SC PS-1, which requires compliance with the Fullerton Fire Prevention Ordinance as per FMC Chapter 13, as well as the Fullerton Building Code as per FMC Chapter 14, the California Fire Code, and the CBC.[90]

New developments would also be required to pay property taxes that would go toward the City's General Fund, which is the Fire Department's main source of funding. As previously addressed, compliance with the California Fire Code and Fullerton Building Code and payment of taxes would minimize the Project's operational impacts to fire protection services to the greatest extent practicable. Further, compliance with SC PS-1 which requires adherence to the Fullerton Fire Prevention Ordinance, the Fullerton Building Code, the California Fire Code, and the CBC, in regard to design of fire protection facilities, would lessen adverse physical impacts associated with the provision of new or physically altered fire facilities. Therefore, the Project would not cause significant environmental impacts resulting in the need for new or expanded Fire Department facilities, or impair service ratios, response times or other performance objectives for fire services.

ii) Police protection?

Less than Significant Impact. The Fullerton Police Department provides police protection services to the City, including the project site. The Police Department headquarters is located at 237 W. Commonwealth Avenue, approximately 3.2 miles northwest of the project site. The Police Department is responsible for providing public safety services within City boundaries. The Police Department has approximately 180 employees, 125 sworn police officers and 55 civilian employees.[91]

Funding for the operation and maintenance of existing police services comes from the City's General Fund. Accordingly, applicants are required to pay property taxes that are imposed on new developments to fund police protection services. The project site would be adequately served by

[90] City of Fullerton. (2024). *Municipal Code*. https://codelibrary.amlegal.com/codes/fullerton/latest/fullerton_ca/0-0-0-22940#JD_Chapter13.19. Accessed July 30, 2025.

[91] City of Fullerton. (N.d.). *Fullerton Police About Us*. https://www.cityoffullerton.com/government/departments/police/about-fpd, Accessed July 30, 2025.

existing Police Department facilities, equipment, and personnel such that new facilities would not be required. Although some calls for service are anticipated, the increase in police services would not be significantly impacted due to the construction and operation of the industrial development. Additionally, development of the site would increase property tax revenues to provide a source of funding to offset any increases in demand for police protection services generated by the Project. Overall, the proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered Police Department facilities which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police services and a less than significant impact would occur.

iii) Schools?

Less than Significant Impact. The City has two school districts: Fullerton School District and the Fullerton Joint Union High School District. However, the project site is not located within the boundaries of either district.[92] The project is located within the boundaries of the Placentia-Yorba Linda Unified School District.[93] The Placentia-Yorba Linda Unified School District provides educational services for students in kindergarten through 12th grade.

The nearest school to the project site is Commonwealth Elementary School located approximately 0.6 miles north of the project site within the Fullerton School District. Within the Placentia-Yorba Linda Unified School District, the nearest elementary middle school is Melrose Elementary, approximately 0.6 miles to the east, the nearest middle school is Valadez Middle School Academy, approximately 0.8 miles to the east, and the nearest high school is Valencia High School, approximately 1.3 miles to the northeast.

The Project would not create a direct demand for public school services, as the Project proposes non-residential uses that would not directly generate any school-aged children requiring public education. Further, as discussed in **Section 4.14: Population and Housing**, significant new employment opportunities would not be generated and would not result in an increase in potential new students. Although the Project would not create a direct demand for additional public-school services, the Project would be required to comply with Senate Bill 50 (Greene Act), which authorizes school districts to impose fees against certain development projects to fund the construction or reconstruction of school facilities. As outlined in SC PS-2, the Project Applicant would be required to submit evidence that school impact fees have been paid prior to the issuance of building permits.

Overall, Project implementation would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives. Additionally, no school facilities exist on the project site and development of the Project would not conflict with existing school structures or require modification of school facilities. Compliance with applicable local and State regulations in addition to SC PS-2 would ensure that Project implementation would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, the

[92] City of Fullerton. (N.D.). *Public Schools*. https://www.cityoffullerton.com/residents/schools/public-schools. Accessed July 30, 2025.
[93] Placentia-Yorba Linda Unified School District. (2025). *Boundary Maps*. https://www.pylusd.org/apps/pages/index.jsp?uREC_ID=206487&type=d&pREC_ID=453794. Accessed July 30, 2025.

construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios for schools and a less than significant impact would occur.

iv) Parks?

Less than Significant Impact. Refer to **Section 4.16: Recreation**.

v) Other public facilities?

Less than Significant Impact. The Fullerton Public Library System serves the City with two main branches. The nearest library is the Fullerton Public Library (Main Branch), located at 353 W. Commonwealth Avenue, approximately 3.4 miles northwest of the project site. The Hunt Branch is located at 201 S Basque Ave, approximately 5.3 miles northeast of the project site. The Project would develop a warehouse facility that would not directly generate population and would not cause or contribute to a need to construct new or physically alter library facilities. Therefore, Project implementation would not result in a substantial adverse physical impact associated with the provision of new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives, and a less than significant impact would occur.

Standard Conditions and Requirements

SC PS-1 The Applicant shall comply with the Fullerton Fire Prevention Ordinance as per Fullerton Municipal Code (FMC) Chapter 13, Fullerton Building Code as per FMC Chapter 14, the California Fire Code, and the CBC in regard to design of fire facilities.

SC PS-2 Prior to the issuance of building permits, the Applicant shall submit evidence to the City of Fullerton that legally required school impact fees have been paid per the mitigation established by the applicable school district.

4.16 RECREATION

ENVIRONMENTAL IMPACTS	Potentially Significant Issues	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
16. RECREATION				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			X	

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? Or,

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less Than Significant Impact.

According to The Fullerton Plan EIR, there are 640.4 acres of public parks and recreational facilities in the City; refer to Exhibit 5.15-1, Public Parks and Recreational Facilities in The Fullerton Plan.[94] The nearest parks are Chapman Park located at 2515 San Carlos Drive approximately 1.4 miles north of the project site and Byerrum Park located at 501 North Raymond Avenue, approximately 2.2 miles northwest of the project site, both which are north of the project site.[95]

The Fullerton Plan includes goals and policies related to parks and recreation. Specifically, The Fullerton Plan establishes a long-term goal to provide 4 acres of useable park area per 1,000 residents. Based on the City's current population of 143,617 residents, the current parkland demand for the City is 575 acres.[96,97] As previously addressed, the Project would not create a direct demand for park facilities because it would not generate substantial population growth requiring the need for new or physically altered park facilities. The Project proposes to demolish an existing business park and construct a new warehouse facility. This Initial Study assumes that the facility could employ approximately 113 employees. It is anticipated that many of these positions would be filled by local residents or residents residing near the City and thus would not generate substantial population growth that would increase the use of these parks or any existing

94 City of Fullerton. (2012). The Fullerton Plan - Final Program EIR https://www.cityoffullerton.com/home/showpublisheddocument/3696/637470826641900000. Accessed August 8, 2025.

95 City of Fullerton. (2008). *Parks*. https://www.cityoffullerton.com/government/departments/parks-recreation/parks-trails-and-fields/parks-and-trails/list-of-parks. Accessed July 30, 2025.

96 143,617 residents x 0.004 acres = 574.5 acres

97 U.S. Census Bureau. (2020). Fullerton City, California. https://data.census.gov/profile/Fullerton_city,_California?g=160XX00US0628000. Accessed July 30, 2025.

neighborhood or regional parks or other recreational facilities. Since the Project would not directly generate population growth and would not indirectly introduce parkgoers to the area, the Project would not cause or contribute to a need to construct new or physically alter park facilities.

Because no park facilities exist on the project site, the Project would not conflict with existing park structures or require modification of park facilities. Overall, Project implementation would not result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives and a less than significant impact would occur.

4.17 TRANSPORTATION

ENVIRONMENTAL IMPACTS	Potentially Significant Issues	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
17. TRANSPORTATION. Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?			X	
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?			X	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	
d) Result in inadequate emergency access?			X	

This section is based in part on the Transportation Assessment Policies and Procedures (TAPP) Worksheet (TAPP Worksheet), prepared by the City of Fullerton, dated May 20, 2025 and included in its entirety as **Appendix L: Transportation Assessment Policies and Procedures (TAPP) Worksheet and Trip Generation Table**.

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

Less than Significant Impact. The proposed Project would not conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Transit Service

Public transit service in the vicinity of the project site is provided by the Orange County Transportation Authority (OCTA). Bus Route 30 provides service from Cerritos to Anaheim via Orangethorpe Avenue; a bus stop is located at the intersection of Orangethorpe Avenue and State College Boulevard, approximately 600 feet west of the project site. Another stop is located at the intersection of Orangethorpe Avenue and South Placentia Avenue, approximately 850 feet east of the site (OCTA, 2025). Bus Route 57 provides service from Brea to Newport Beach via State College Boulevard; a bus stop is located at the intersection of Orangethorpe Avenue and State College Boulevard, approximately 870 feet west of the project site.

Project construction would be temporary in nature and would not result in any road closures. Public transit service would continue to operate during Project construction. Upon Project implementation, public transit bus service would continue to be provided by the OCTA. Employment-generating uses currently occur within the site and have been anticipated by The Fullerton Plan. Significant new employment opportunities potentially resulting in a significant

increase in the use of transit would not be generated; refer to *Section 4.14, Population and Housing*. Therefore, the Project would not conflict with a program plan, ordinance, or policy addressing transit.

Roadway facilities

The proposed warehouse facility would continue to provide vehicular access from two driveways on East Orangethorpe Avenue and one driveway at the terminus of the Cypress Way cul-de-sac. Passenger vehicles would have access to the project site from all three driveways. The existing driveway off of Cypress Way would be a 64-foot-wide truck ingress and egress point. The western driveway along Orangethorpe Avenue would be closed and a new driveway would be provided approximately 110 feet to the west. New curb and gutter and sidewalk improvements would also be constructed at the closed driveway. The new western driveway along Orangethorpe Avenue would be 40-foot-wide and allow for truck ingress. The existing eastern driveway along Orangethorpe Avenue would be 26-foot-wide and would exclusively allow for passenger and emergency vehicle ingress and egress. No changes to the existing roadway network would occur. All driveway improvements would be constructed pursuant to the City's requirements. Therefore, the Project would not conflict with a plan, ordinance, or policy concerning roadway facilities.

Pedestrian and Bicycle Facilities

There is an existing sidewalk along Orangethorpe Avenue, adjacent to the project site. As discussed above, the Project would be accessible from two driveways on Orangethorpe Avenue. The existing eastern driveway would be maintained, and the western driveway would be closed and new curb and gutter would be constructed and sidewalk connection would be provided. The Project would also provide landscaping and trees along the Project frontage. Project construction could temporarily impact pedestrian facilities; however, this would be temporary and would not result in a significant impact.

The City of Fullerton Bicycle Master Plan (Exhibits 3.1 and 5.1) identifies existing and proposed bicycle facilities within the City. According to the Bicycle Master Plan, Class II bike lanes are identified as proposed on Orangethorpe Avenue. A Class II bike lane is defined as a lane striped for one-way travel. Project implementation would not conflict with the bicycle lanes identified in The Fullerton Plan, as no road improvements are proposed. During Project operations, the Project includes the provision of bicycle parking in its plan. As such, Project construction and operation would not result in a significant impact to proposed bicycle facilities.

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

Less than Significant Impact. State CEQA Guidelines Section 15064.3 codifies the change from Level of Service to VMT as a metric for transportation impact analysis. Pursuant to SB 743, VMT analysis is the primary method for determining CEQA impacts. Jurisdictions were not required to adopt VMT as a significant impact determination until July 1, 2020. The City's TAPP requires a VMT Assessment for all projects in accordance with CEQA. The City's TAPP sets criteria for the evaluation of projects and the preparation of VMT Assessments. The City relies on the North Orange County Collaborative VMT Traffic Study Screening Tool, which assists in identifying projects that meet VMT screening criteria and therefore do not result in project-generated VMT impacts.

A TAPP Worksheet was prepared by the City of Fullerton Traffic Engineer for the proposed Project; refer to **Appendix L**. VMT Screening indicates the proposed Project is anticipated to generate less than 836 VMT. As a result, the Project passed the Primary Screening analysis and a Secondary Screening analysis was conducted. The proposed Project also passed the Secondary Screening criteria. Although additional VMT analysis was not required, a VMT Analysis was conducted; refer to **Table 32: VMT Analysis.**

Table 32: VMT Analysis

Proposed Project	
Estimated Daily Trips	225
Average Trip Length	8.9
Service Population	110
VMT per Service Population	18.1
Proposed Project VMT	2,003
Existing Use VMT Credit	13,047
Net Project VMT	-11,044
Target VMT per Service Population Threshold	29.6
Percentage above/below VMT Target	**-38.9%**

Source: TAPP Worksheet, **Appendix L**.

As indicated in **Table 32,** the proposed Project would have a VMT/Service Population of 18.1, which would be approximately 38.9 percent lower than the Target VMT/Service Population Threshold of 29.6. Therefore, the proposed Project would not have a VMT impact and would not conflict or be inconsistent with CEQA Guidelines section 15064.3(b), a less than significant impact would occur and no mitigation is required.

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

Less than Significant Impact. The Project proposes to remove the existing business park and develop a new warehouse use consistent with the project site's land use Industrial (I) land use designation and Southwest Industrial Focus Area. Therefore, the Project would not introduce an incompatible use to the site. Internal drive aisles would accommodate standard fire lane turning radiuses and hammerhead turnaround maneuvers design for emergency vehicles and fire services. The project site would continue to be accessed from two existing driveways along Orangethorpe Avenue and one driveway at the terminus of the Cypress Way cul-de-sac. The existing western driveway along Orangethorpe Avenue closed and a new driveway would be provided approximately 110 feet to the west. New curb and gutter and sidewalk improvements would also be constructed at the closed driveway. The proposed driveway and internal circulation improvements would be constructed pursuant to City of Fullerton Fire Department standards. The Project would not provide any off-site roadway improvements that could substantially increase hazards due to a design feature.

As part of the City's Site Plan Review process required under FMC Chapter 15.47, Site Plan Review, the site plan would be reviewed and only approved after finding the proposed development conforms with applicable requirements and standards set forth in the FMC. Therefore, the Project

would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). As such impacts are considered less than significant and no mitigation is required.

d) Result in inadequate emergency access?

Less than Significant Impact. The proposed Project driveway entrances and interior drive aisles would accommodate standard fire lane turning radiuses and hammerhead turnaround maneuvers. Internal drive aisles would be greater than 20 feet wide to accommodate fire apparatus requirements for fire truck access and turning radius. The Fullerton Fire Department would review the Project and specified access requirements concerning minimum roadway width, fire apparatus access roads, fire lanes, signage, access devices and gates, and access walkways, among other requirements, which would enhance emergency access to the project site. Project plans would be reviewed by Fullerton Fire Department for final approval prior to issuance of a building permit. Compliance with the Fullerton Fire Department's requirements would ensure impacts to emergency access would be less than significant.

There is the potential that one or more traffic lanes located immediately adjacent to the project site may be temporarily closed or controlled by construction personnel during construction activities. However, this would be temporary and emergency access to the project site and surrounding area would be required to be maintained at all times. All construction staging would occur within the boundaries of the project site and would not interfere with circulation along nearby roadways. The Project would comply with standard condition SC HAZ-1, which would require the prepare a Traffic Control Plan for implementation during the construction phase, as deemed necessary by the City Traffic Engineer, as well as SC HAZ-2, in which the City Community and Economic Development Department would consult with the Fullerton Police Department to disclose temporary closures and alternative travel routes, in order to ensure adequate access for emergency vehicles. Therefore, the Project would not result in inadequate emergency access to the City, and a less than significant impact would occur.

4.18 TRIBAL CULTURAL RESOURCES

ENVIRONMENTAL IMPACTS	Potentially Significant Issues	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
18. TRIBAL CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: i) Listed or eligible for listing in the California				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?				X
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?		X		

a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

No Impact. The project site is currently developed with a five-building multi-tenant business park that was constructed in 1983. As discussed in **Section 4.5: Cultural Resources**, the project site does not contain any features meeting the historic resources criteria and does not meet the definition of a historic resource under CEQA. The Fullerton Plan EIR does not identify any historic resources structures located on the project site nor is the project site located within a historic district in the City.[98] Therefore, no known historical resources pursuant to CEQA Guidelines Section 15064.5 were identified on the project site, and the proposed Project would not cause a change in the

[98] City of Fullerton. 2012. *The Fullerton Plan Final Program EIR – Section 5.10 Cultural Resources*. https://www.cityoffullerton.com/home/showpublisheddocument/3686/637470826615030000. Accessed September 2025.

significance of a historical resource. In addition, a request was submitted to the Native American Heritage Commission (NAHC) to review the Sacred Lands File (SLF) database for any sacred landscape or Tribal resources within or near the project site. A negative response was received on September 5, 2024, which indicated that no recorded SLFs were on file within or near the project site. No impact would occur and no mitigation is required.

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less than Significant Impact with Mitigation Incorporated. The Project is subject to compliance with AB 52, which requires consideration of impacts to "tribal cultural resources" (TCRs), defined in Section 21074 of the Public Resources Code, as part of the CEQA process. AB 52 requires the City to notify any groups (who have requested notification) who are traditionally or culturally affiliated with the geographic area of a project for which a negative declaration, an MND, or an EIR is required pursuant to CEQA. The Tribes are provided 30 days to request consultation after the lead agency notifies the tribe of a project. In compliance with Public Resources Code Section 21080.3.1(b), the City provided formal notification to California Native American tribal representatives Based on the City's Tribal Contact List. Native American groups may know the area's cultural resources and may have concerns about a development's adverse effects on tribal cultural resources, as defined in Public Resources Code Section 21074. The City sent AB 52 notification letters to the tribal representatives listed below on July 25th 2025.

- Gabrieleno Band of Mission Indians – Kizh Nation – Andrew Salas, Chairperson
- Gabrieleno Band of Mission Indians – Kizh Nation – Christina Swindall Martinez, Secretary
- Gabrielino/Tongva San Gabriel Band of Mission Indians – Anthony Morales, Chairperson
- Gabrielino/Tongva Nation – Sandonne Goad, Chairperson
- Gabrielino Tongva Indians of California Tribal Council – Robert Dorame, Chairperson
- Gabrielino Tongva Indians of California Tribal Council – Christina Conely, Cultural Resource Administrator
- Gabrielino-Tongva Tribe – Charles Alvarez, Chairperson
- Gabrielino-Tongva Tribe – Sam Dunlap, Cultural Resource Director
- Juaneño Band of Mission Indians Acjachemen Nation – Belardes – Joyce Perry, Cultural Resource Director
- Juaneño Band of Mission Indians Acjachemen Nation 84A – Heidi Lucero, Chairperson, Tribal Historic Preservation Officer
- Pala Band of Mission Indians – Alexis Wallick, Assistant, Tribal Historic Preservation Officer

The City received responses from three tribes regarding the AB 52 letter: the Gabrielino Band of Mission Indians – Kizh Nation, Gabrielino Tongva Indians of California Tribal Council, and Pala Band of Mission Indians. The Pala Band of Mission Indians declined AB 52 consultation as they

determined the project site is not within the boundaries of the recognized Pala Indian Reservation. Both the Gabrieleno Band of Mission Indians – Kizh Nation and the Gabrielino Tongva Indians of California requested tribal consultation under AB52.

On August 19, 2025, the City responded to Kizh Nation to schedule a consultation meeting. A formal consultation meeting was scheduled for October 14, 2025; however, the Kizh Nation representative was unable to attend due to a scheduling conflict. In lieu of the meeting, the Tribe submitted written comments and proposed mitigation language on October 21, 2025. Based on this consultation, the City incorporated the Tribe's recommended measures as Mitigation Measures MM TCR-1 through MM TCR-3, with minor modifications. The revised measures were provided to Kizh Nation on October 28, 2025. As of the date of publication, consultation with Kizh Nation remains open.

The City responded to Gabrielino Tongva Indians of California request for consultation on August 28, 2025 with the Project Cultural Resources Memorandum, and followed up on September 11, 2025 and September 25, 2025 to request a meeting time. As of the date of publication, the City has not received any responses from the Gabrielino Tongva Indians of California to schedule consultation.

No known tribal cultural resources have been identified on the project site. Notwithstanding, the potential exists for the discovery of unknown buried archaeological or tribal cultural resources during ground disturbing activities. To address potential impacts during ground-disturbing activities, the proposed Project would be required to comply with MM CUL-1, which requires that, if cultural resources are discovered during Project activities, earthwork and ground-disturbing activities would halt within 60 feet of the find and a qualified archaeologist would be hired to assess the find. Should the find be deemed significant, a Cultural Resources Monitoring and Treatment Plan would be created. Additionally, as outlined in MM TCR-1, the Project applicant would be required to retain a Native American Monitor for ground disturbing activity. If a tribal cultural resource is identified, all construction activities within 50 feet shall cease until the resource has been assessed. Kizh Nation shall recover and retain the resource and determine appropriate treatment. If human remains are found, implementation of MM TCR-2 and MM TCR-3 would be required, which details instructions when inadvertent discovery of human remains occurs and procedures for burials and funerary remains. Therefore, with implementation of MM CUL-1 and MM TCR-1 through MM TCR-3 the Project would result in a less than significant impact concerning a substantial adverse change in the significance of a tribal cultural resource.

Mitigation Measures

MM TCR-1 Prior to issuance of a grading permit, the applicant shall retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities to the extent that soil deeper than 4 feet are disturbed:

A. The project applicant shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). As the existing project site was previously

developed, "Ground-disturbing activity" shall include, but is not limited to, boring, grading, excavation, drilling, and trenching that disturbed soil deeper than 4 feet below grade.

B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any "ground-disturbing activity", or the issuance of any permit necessary to commence a "ground-disturbing activity".

C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency.

D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

E. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

MM TCR-2 Prior to issuance of grading permit, the following notes shall be listed on the grading plans for the project:

A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code, Section 5097.98, are also to be treated according to this statute.

B. If Native American human remains and/or grave goods discovered or recognized on the project site, then all construction activities shall immediately cease. Health and Safety Code, Section 7050.5, dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American,

he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code, Section 5097.98, shall be followed.

C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).
D. Construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the Kizh determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the Kizh monitor and/or archaeologist deems necessary). (CEQA Guidelines Section 15064.5(f).)
E. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.
F. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

MM TCR-3 Prior to issuance of grading permit, the following notes shall be listed on the grading plans for the project:

A. As the Most Likely Descendant ("MLD"), the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains.
B. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created.
C. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials.
D. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed.
E. In the event preservation in place is not possible despite good faith efforts by the project applicant/developer and/or landowner, before ground-disturbing activities may resume on the project site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects.

F. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

G. The Tribe will work closely with the project's qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does not authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.

4.19 UTILITIES AND SERVICE SYSTEMS

ENVIRONMENTAL IMPACTS	Potentially Significant Issues	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
19. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?			X	
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?			X	

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less than Significant Impact. The following discusses the Project's potential impacts on water, wastewater (conveyance and treatment), storm water drainage, electric power infrastructure, natural gas facilities, and telecommunications facilities and infrastructure.

Water

The City of Fullerton would continue to provide water service to the project site via connection to an existing 12-inch water main in Orangethorpe Avenue and an 8-inch water main in Cypress Way. The Project proposes water connections for domestic water, fire protection, and landscape irrigation. The Project also includes relocation of the existing on-site water loop to align with the proposed site configuration.

The City of Fullerton Public Works Department Water Division oversees the City's water system, including upgrades and repair to infrastructure, water conservation, and water quality. The 2020 Urban Water Management Plan (2020 UWMP) is a comprehensive document that evaluates a water supplier's reliability over a long-term (20 to 25 year) horizon. UWMP water demand forecasts are based on adopted general plans. The 2020 UWMP forecasts water demand for commercial land uses within the City to increase from 4,478 AF in 2025 to 4,987 AF by 2045. The proposed Project's water demand would account for less than one percent of the overall anticipated water demand for commercial land uses from 2025 through 2045. The Project's water demand is shown in **Table 33: Project Water Demand**.

Table 33: Project Water Demand

Condition	Total Water Demand (gpd)	Total Water Demand (gpm)
Existing Conditions	2,852	1.98
Proposed Project	3,196	2.22
Net Change	+ 344 (increase)	+ 0.24 (increase)

Source: Appendix J: Water Demand Assessment

Although the proposed Project would increase water demand over existing conditions, the Water Demand Assessment concluded the proposed water demand increase would not impact the existing infrastructure and the City would be able to serve the Project. The 2020 UWMP forecasted total water demand to be 25,655 AF in 2025.[99] The proposed Project would demand up to 3,196 gallons per day or 3.58 AF.[100] Project implementation would account for less than one percent of current water demand of 25,655 AF in 2025. Further, it is not anticipated that the Project would generate significant population growth. Therefore, the proposed Project would not require the construction of new or expanded water supply or treatment facilities. Impacts would be less than significant and no mitigation is required.

Wastewater

The City of Fullerton would also continue to provide sewer service to the project site via connection to an existing 8-inch sanitary sewer main in Cypress Way. In addition, a secondary point of connection may be extended to an existing City of Placentia sewer main in Orangethorpe Avenue. Compliance with the City of Placentia applicable requirements for the proposed connection would be confirmed through the City's review process prior to permit issuance.

The Sewer Capacity Analysis prepared for the Project (**Appendix K**) assumed all sewage generation would for the Project would utilize the existing City of Fullerton owned sewer main line in Cypress Way. However, the Project proposes that approximately 2,104 gallons per day (GPD) of the total wastewater flow, corresponding to the southern half of the warehouse, would be directed to the City of Placentia owned sewer main in Orangethorpe Avenue. As such, the analysis presented for the City of Fullerton in the Sewer Capacity Analysis represents a conservative evaluation of available sewer capacity.

[99] Arcadis. August 2025. 2020 Urban Water Management Plan Table 4-4 Retail: Total Water Use (Potable and Non-Potable), Available at: https://www.cityoffullerton.com/home/showpublisheddocument/5052/637598829614070000, Accessed August 11, 2025.

[100] 1 AF equals about 892 AF per year

The project site is within the City's Sewer Maintenance District 2 and served by an existing 8-inch sanitary sewer main and manhole at station 7+94 in Cypress Way. The existing buildings are connected to an existing sewer main that connects east of the manhole. The City of Fullerton 2009 Sewer Master Plan identified system deficiencies concerning capacity and structural condition, and developed a 20-year Capital Improvement Program (CIP), which addresses these deficiencies. The proposed sewage generation for the Project has been estimated using the sewage generation factors from Table F229 of the Sewer Capacity Analysis; see **Appendix K: Sewer Capacity Analysis.** Projected sewage generation for the Project compared to existing conditions is provided in **Table 34: Project Sewer Demand.** The Project would result in a net total decrease of 52 gpd over existing conditions.

Table 34: Project Sewer Demand

Description	Facility Description	Size (SF)	Sewage Generation Factor in Gallons per Day (GPD)	Total
Office Space	Office	10,000	120/1,000 gross SF	1,200 GPD
Warehouse Space	Warehouse	100,232	30/1,000 gross SF	3,007 GPD
		Project Total	Total GPD	4,207 GPD
		Existing Development	*Total GPD*	*4,259 GPD*
			Net Project Difference	**-52 GPD (decrease)**

Source: Pacific Consulting Group, Inc. (July 2025). Cedarwoods Fullerton Sewer Capacity Analysis.

As indicated in **Table 34,** the Project would result in a net total decrease of 52 GPD compared to existing conditions; therefore, the Project would not contribute to any existing sewer capacity deficiencies. Therefore, the Project applicant would not be required to contribute a fair-share cost to the City for the Sewer Master Plan improvement projects for sewer capacity. Additionally, the maximum flow capacity (assuming 50 percent full flow) of the 8-inch sewer main in Cypress Way is 17.15 GPM, which exceeds the Project's sewage generation estimate. Based on the findings in Sewer Capacity Analysis, the proposed sewage generation from the Project would not have any impact on the existing sewer infrastructure. As noted above, this is a conservative analysis as 2,104 GPD of the total 4,207 GPD would be serviced by a lateral connection to an existing City of Placentia owned sewer main line in Orangethorpe Avenue.

The proposed sewer connection in Orangethorpe Avenue has been coordinated with the City of Placentia staff, who has confirmed its feasibility. In addition, Placentia staff has confirmed the existing sewer-main in Orangethorpe Avenue has sufficient capacity to accommodate the estimated 2,104 GPD associated with the proposed Project.[101] The additional sewer generation would not result in a significant increase, such that it would exceed the capacity of the existing line. The Project would be required to comply with applicable requirements outlined City of Placentia Municipal Code Chapter 16.12, Sewer Connection, which would be confirmed through the City of Placentia's standard review process prior to sewer connection permit issuance. Therefore, following compliance with the established regulatory framework described above, the Project

[101] Based on phone conversation with City of Placentia, Deputy Director of Public Works, Gabriel Guerrero-Gabany (714) 993-8250, on October 29, 2025.

would not result in new or expanded wastewater facilities which could cause a significant environmental effect. A less than significant impact would occur and no mitigation is required.

Storm Water Drainage Facilities

See Threshold 4.10c concerning drainage patterns and stormwater drainage systems. As discussed in Threshold 4.10c, the Project proposes on-site drainage improvements. No off-site drainage improvements are proposed or required. The environmental impacts associated with the proposed drainage improvements are analyzed as a part of the overall Project analysis in this Initial Study. As concluded in this Initial Study, following compliance with the established regulatory framework, the proposed drainage improvements' environmental effects would be less than significant and no mitigation is required.

Electric Power, Natural Gas, and Telecommunications Facilities

Electrical power is provided by Southern California Edson (SCE). See **Section 4.6: Energy** for further discussions concerning electricity. The Project's anticipated electricity demand would be approximately 0.830 GWh per year, which would represent less than 0.01 percent of SCE's projected sales when then Project is operational. The proposed Project would not connect to or utilize natural gas. Telecommunications services are provided by Spectrum, Frontier, and AT&T. The project site is served by existing telecommunication infrastructure. The various telecommunication providers would continue to provide service coverage to the proposed Project. The Project proposes to connect to existing electrical and telecommunications infrastructure and no off-site improvements are proposed or required. The environmental effects associated with the necessary on-site electrical and telecommunications improvements are analyzed as a part of the overall Project analysis in this Initial Study. As concluded in this Initial Study, following compliance with the established regulatory framework, the proposed utility improvements' environmental effects would be less than significant and no mitigation is required.

b) Would the project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. The City of Fullerton is a retail water supplier and supplies water currently provide water to the business park on the project site. The 2020 UWMP indicates that water supplies would meet the water demands for normal, single-dry, and multiple dry-year conditions through 2045. Population growth forecasts within adopted general plans are factored into UWMP water demand forecasts

The City meets all of its water demand through a combination of imported water and local groundwater. The City works together with two primary agencies, the Metropolitan Water District of Southern California (MWD) and the Orange County Water District (OCWD), to ensure water supply reliability. Groundwater from the Orange County Groundwater Basin (Basin) accounts for approximately 79 percent of the City's overall supply, followed by imported water at 21 percent. It is projected that by 2045, the water supply portfolio will change to approximately 85 percent groundwater and 15 percent imported water. If the City exceeds their groundwater allocation, a purchase agreement is in place with MET that allows purchase of supplemental imported water. The City maintains seven imported water connections to MET and six emergency interconnections with other utilities.

The OC Basin is not adjudicated and as such, pumping from the OC Basin is managed through a process that uses financial incentives to encourage groundwater producers to pump a sustainable amount of water. The framework for the financial incentives is based on establishing the Basin Production Percentage (BPP), the percentage of each Producer's total water supply that comes from groundwater pumped from the OC Basin. The BPP is set based on groundwater conditions, availability of imported water supplies, and OC Basin management objectives. OCWD has a policy to manage the groundwater basin within a sustainable range to avoid adverse impacts to the OC Basin.

The 2020 UWMP forecasted its total water demand to be 27,850 AF by 2045. Additionally, the population is expected to increase from 141,648 persons in 2020 to 189,687 persons by 2045. In the case of a water supply shortage, the City has prepared a Water Shortage Contingency Plan to ensure adequate service. Further, the Project proposes to remove the existing on-site structures and develop a new warehousing building, consistent with the project site's land use (I) designation and Southwest Industrial Focus Area. Significant new employment opportunities would not be generated and would not require a significant increase in water demand. Further, development, as proposed, would result in a FAR of 0.53, which is less than the 1.0 projected development intensity for the Southeast Industrial Focus Area, and, therefore, less than the development capacity assumptions identified in The Fullerton Plan. Therefore, the Project's anticipated water demand is accounted for in the 2020 UWMP. The 2020 UWMP indicates adequate water supplies would be available to serve future water demands during normal, dry and multiple years, which includes water demand associated with the existing site. Therefore, impacts to water supplies would be less than significant.

c) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. City-owned wastewater collection facilities that serve the City are operated and maintained by the City of Fullerton Public Works Engineering Division. The City's current wastewater system includes 330 miles of pipeline and 6,850 manholes. The City's wastewater system discharges to several of the Orange County Sanitation District's (OCSD) trunk lines. The City of Placentia wastewater collection system also conveys untreated wastewater to Orange County Sanitation District's (OCSD) trunk sewer system. OCSD collects, treats, and disposes of and/or reclaims wastewater generated by residents in northwestern and central Orange County. OCSD has two operating facilities, Reclamation Plant No. 1 and Treatment Plant No. 2, located in the cities of Fountain Valley and Huntington Beach, respectively. Through these facilities, OCSD collects, conveys, treats, and/or reclaims more than approximately 170 million gallons of wastewater generated daily in its service area.[102]

Wastewater is collected and treated at Treatment Plant No. 2. The estimated daily flow of wastewater received at Plant No. 2 is 68 million gallons (mgd). This facility currently has a total primary treatment capacity of 168 mgd, with an average daily treatment of approximately 127 mgd. Therefore, there is approximately 41 mgd of excess primary treatment capacity at OCSD Plant

[102] Orange County Sanitation District. (OCSAN). Regional Sewer Service. https://www.ocsan.gov/regional-sewer-service/#waterreclamation. Accessed August 11, 2025.

No. 2. As discussed above, the proposed Project would result in a total decrease in wastewater generated of 52 gpd. This represents a nominal decrease in wastewater treatment demand at Treatment Plant No. 2. Existing wastewater treatment capacity is sufficient to meet Project demand and Project implementation would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities. A less than significant impact would occur and no mitigation is required.

d) Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? Or,

e) Would the project comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. The Project is anticipated to generate solid waste during the temporary, short-term construction phase, as well as the operational phase, but it is not anticipated to result in inadequate landfill capacity. The City contracts with Republic Services to provide solid waste and recycling services. The majority of solid waste generated in the City is disposed of at the Olinda Alpha Landfill located at 1942 Valencia Avenue in the City of Brea. According to CalRecycle, the maximum permitted throughput for the landfill is 8,000 tons/day and the maximum permitted capacity is 148,800,000 CY. The remaining capacity is approximately 17,500,000 CY.[103]

The Fullerton Plan EIR identifies a solid waste generation rate of 6.0 pounds per 1000 square feet per day for business parks, offices, and commercial uses. Given the 110,232 square feet of proposed warehouse and ancillary office space the anticipated solid waste generation from the Project according to this generation factor is approximately 661.40 pounds per day (0.33 tons/day)[104]. The solid waste volume would be less than one ton per day and therefore considered a nominal amount of the daily capacity of any of the landfills serving the City.

Regulations specifically applicable to the proposed Project include the California Integrated Waste Management Act of 1989 (AB 939), and CalGreen Code Section 4.408, and AB 341. The Integrated Waste Management Act, which requires every city and county in the State to prepare a Source Reduction and Recycling Element (SRRE) to its Solid Waste Management Plan, identifies how each jurisdiction will meet the State's mandatory waste diversion goal of 50 percent by and after the year 2000. AB 341 requires that at least 75 percent of waste generated from construction activities be diverted to recycling centers.

The 2025 CalGreen Code Section 4.408 requires preparation of a Construction Waste Management Plan that outlines ways in which the contractor would recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition debris. During the construction phase, the Project would be required to comply with the CalGreen Code through the recycling and reuse of at least 65 percent of the nonhazardous construction and demolition debris from the project site.

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[103] CalRecycle. (2025). *Solid Waste Information System (SWIS) Facility Details – Olinda Alpha Landfill (30-AB-0035)*. Retrieved from https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2757?siteID=2093. Accessed on August 11, 2025.

[104] 110,232 SF x 6.0lbs per day/1000 SF = 661.40 lbs/day

Construction and operational activities would be required to comply with all applicable federal, State, and local statutes and regulations for solid waste, including those identified under the most recent CALGreen Code. There is sufficient landfill capacity to serve the proposed Project, and the proposed Project would not conflict with solid waste reduction goals. The Project would result in a less than significant impact concerning solid waste and no mitigation is required.

4.20 WILDFIRE

ENVIRONMENTAL IMPACTS	Potentially Significant Issues	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
20. WILDFIRE. If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				X
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				X
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				X
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				X

a) If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. According to CAL FIRE's Fire Hazard Severity Zones Map for the City, the project site is not located in or near a State Responsibility Area (SRA) nor Very High Fire Hazard Severity Zone (VHFHSZ)[105]. As illustrated in the Fullerton 2021-2029 Safety Element Exhibit 5: Fire Hazard Severity Zones in Fullerton the project site is located in a Local Responsibility Area (LRA).[106] As shown in CAL FIRE's FHSZ Viewer, the closest VHFHZ to the project site is located approximately 4 miles northwest of the site, bordering Beach Boulevard and the northern boundary of the City.[107] The project site is bordered to the south by Orangethorpe Ave, which is identified as a potential evacuation route.[108] Therefore, the proposed Project would not substantially impair an adopted emergency response plan or emergency evacuation plan due to a wildfire, and no impact would occur.

[105] CAL FIRE. (2024). Fire Hazard Severity Zones Viewer. https://egis.fire.ca.gov/FHSZ/. Accessed on July 9, 2025.
[106] City of Fullerton. (2024). Safety Element Supplement, Exhibit 5 Fire Hazard Severity Zones in Fullerton.: https://www.cityoffullerton.com/home/showpublisheddocument/8834/638586480019470000. Accessed July 9, 2025.
[107] CAL FIRE. (2024). Fire Hazard Severity Zones Viewer. Retrieved from: https://egis.fire.ca.gov/FHSZ/. Accessed on July 9, 2025
[108] City of Fullerton. (2024). Safety Element Supplement, Exhibit 1: Potential Evacuation Routes in Fullerton. https://www.cityoffullerton.com/home/showpublisheddocument/8834/638586480019470000. Accessed July 9, 2025.

b) If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. As noted in Threshold 4.20(a) above, the project site is not located in or near an SRA and the project site does not contain lands classified as VHFHSZs. The Project would not exacerbate wildfire risks or expose Project occupants to pollutant concentrations, or the uncontrolled spread of a wildfire and no impact would occur.

c) If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. As noted in Threshold 4.20(a) above, the project site is not located in or near an SRA and does not contain lands classified as VHFHSZs. The Project would include construction and operation of a warehouse/distribution facility and would connect to the existing sanitary sewer, water, and fire water infrastructure available in Cypress Way; see **Figure 10**. Construction and operation of the Project would not increase the risk of fire, nor would it require the installation/maintenance of infrastructure that would exacerbate fire risk, and no impact would occur.

d) If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. As noted in Threshold (a) above, the project site is not located in or near an SRA and does not contain lands classified as VHFHSZs. Further, because the project site and surrounding area is relatively flat and located within an urbanized area, it would not expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes and no impact would occur.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

ENVIRONMENTAL IMPACTS	Potentially Significant Issues	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
21. MANDATORY FINDINGS OF SIGNIFICANCE. Does the project:				
a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			X	
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?			X	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less than Significant Impact. As discussed throughout this Initial Study, the proposed Project does not have the potential to significantly degrade the quality of the environment or result in significant impacts to the environment that cannot be reduced to less than significant following compliance with the established regulatory framework (i.e., local, State, and federal regulations) and the recommended mitigation measures.

As concluded in **Section 4.4: Biological Resources**, the Project would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten or eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal.

As concluded in **Section 4.5: Cultural Resources**, the Project would not eliminate important examples of the major periods of California history or prehistory. SCCIC records search and historic aerial imagery review did not indicate any historical buildings or resources within the project site. The project site's existing commercial retail buildings and structures does not meet the criteria of

"architecturally significant" or a "historic resource" under CEQA. Therefore, the proposed Project would not cause a change in the significance of a historical resource.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact. The Project does not have impacts that are individually limited but cumulatively considerable. Incremental impacts resulting from Project construction and operations and other cumulative projects that would be under construction include biological resources, cultural resources, geology and soils, and tribal resources. The analysis concluded that these incremental impacts are each less than significant or can be mitigated to a less than significant level. When viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects, these impacts are not cumulatively considerable. There would be no cumulative impacts in connection with this or other projects. The project complies with long-term regional air quality plans, and regional population forecasts, and is within the service capabilities of utility purveyors. There would be no significant adverse environmental impacts. The analysis contained in this Initial Study evaluated existing conditions, potential impacts associated with project development, and possible environmental cumulative impacts. The Project does not have any impact on projected growth or planned projects for the City or neighboring jurisdictions known as of the date of this analysis.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact. As discussed in this Initial Study, there are no known substantial adverse effects on human beings that would be caused by the proposed Project. The environmental evaluation has concluded that no significant environmental impacts would result from the proposed Project. Therefore, impacts concerning adverse effects on human beings would be less than significant.

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