CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY

The Department of Toxic Substances Control (DTSC) has completed the following document for this project in accordance with the California Environmental Quality Act (CEQA) [Pub. Resources Code, div. 13, § 21000 et seq] and accompanying Guidelines [Cal. Code Regs., tit. 14, § 15000 et seq].

PROJECT INFORMATION

PROJECT TITLE: Former Diceon Electronics, Inc Interim Remedial Action Plan.		SITE CODING: 401524
PROJECT ADDRESS: 2215 South Standard Avenue	CITY: Santa Ana	COUNTY: Orange
PROJECT SPONSOR: First Warner Properties LLC	CONTACT: Sosi Bardakjian	PHONE: 714-545-9822

APPROVAL ACTION UNDER CONSIDERATION BY DTSC:

☐ Initial Permit Issuance ☐ Permit Re-Issuance ☐ Permit Modification ☐ Closure Plan
☐ Removal Action Workplan ☐ Remedial Action Plan ☐ Interim Removal ☐ Regulations
☐ Corrective Measure Study/Statement of Basis ☒ Other (specify): Interim Remedial Action Plan

STATUTORY AUTHORITY:

☐ California H&SC, Chap. 6.5 ☒ California H&SC, Chap. 6.8 ☐ Other (specify):

DTSC PROGRAM/ADDRESS: Brownfields Restoration and School Evaluation Branch 5796 Corporate Avenue, Cypress CA 90630	CONTACT: Chia Rin Yen	PHONE: 714-484-5392

PROJECT DESCRIPTION:

The California Department of Toxic Substances Control (DTSC), pursuant to authority granted under the Health and Safety Code, Chapter 6.8, Section 25355.5(a)(1)(C) and the Voluntary Cleanup Agreement, Docket Number HSA-FY 16/17-065, will be considering approval of an Interim Remedial Action Plan (IRAP) for the former Diceon Electronic, Inc., located at 2215 South Standard Avenue, in Santa Ana, California (Project Site). See Figures 1 and 2 for the Project Site location and lay-out. The IRAP was prepared by Black Rock Geosciences on behalf of First Warner Properties LLC. The IRAP proposes to implement interim measures to remove soils impacted with volatile organic compounds (VOCs), treat groundwater and saturated soils via in-situ injection of VOC-reducing materials and restrict the Project Site to commercial/industrial use.

BACKGROUND:

The Project Site was in agricultural use between at least 1938 and 1953. From 1954 to 1972, Moratta Valve & Scientific Controls manufactured valves and other metal parts within Building A. Between 1972 and 1995, various companies manufactured printed electronic circuit boards within the Project Site. These companies included Standard Logic (1972 to 1983), Drill-tron dba Litronic Industries (1973 to 1986), and Diceon Electronics, Inc. (1986 to 1995).

The Project Site was utilized for the assembly of natural-gas-fueled trucks and warehousing of truck parts between approximately 1999 and 2017. Building B was built following in 1999 on the eastern portion of the Project Site. The Project Sitewas utilized for the assembly of natural-gas fueled trucks and warehousing of their parts between approximately 1999 and 2017. The Project Site has been in use by a cabinet manufacturer (Prime Tech Cabinets) since 2017.

During the Project Site's use between 1972 and 1995, tetrachloroethene (PCE) and trichloroethene (TCE) were released into the soils near the two onsite buildings (Buildings A and B). The extent and nature of the soil contamination was assessed using chemical data collected from 57 soil borings sampled between 1992 and 2015. PCE

concentrations in soil were reported up to 3,356 micrograms per kilogram (µg/kg). VOCs were also detected in soil vapor at concentrations exceeding the screening levels for commercial/industrial land use.

Groundwater containing elevated PCE and TCE concentrations underlies the Project Site. This impacted groundwater extends from the Project Site to at least 1,500 feet southwest of the Project Site. See Figure 3.

The IRAP proposes soil excavation at five locations described below and in-situ chemical oxidation (e.g., zero valent iron) directly into the contaminated saturated soil and groundwater in order to destroy the chemical contaminants in place. The purpose of the IRAP is to control migration of VOCs offsite while investigation continues to define extent of the contaminated groundwater plume. Upon completion of the investigation, additional remedies may be proposed. The excavation of impacted soil and injection of VOC-reducing materials will not be completed during one remedial event. They will be completed as funding becomes available, and as the extent of impacted soil and groundwater is fully assessed. These remedial events are expected to be completed between 2021 to 2028. The implementation schedule is summarized in Table 1 (below) and the locations of the excavation and injection wells are shown in Figures **4 and 5**, respectively. A land use covenant will be recorded for to restrict the Project Site for commercial/industrial use only and prohibit the use of the groundwater beneath the Project Site.

Table 1 – Phases and Tentative Schedule for Soil Excavation and Groundwater Treatment

Phases	Location	Activities	Schedule (year)/duration
1	Between Onsite Buildings A and B	Excavation of approximately 5,557 cubic yards (cy) of contaminated soil	2021/ approximately 40 to 50 days
2	Beneath Building A	Excavation of approximately 1,370 cy of contaminated soil	2022/ approximately 40 to 50 days
3	Beneath Building B	Excavation of approximately 7,289 cy of contaminated soil	2024/ approximately 40 to 50 days
4	North of Onsite Buildings A and B	Excavation of approximately 5,767 cy of contaminated soil	2026/ approximately 40 to 50 days
5	South of Project Site	Excavation of approximately 6,311 cy of contaminated soil	2028/ approximately 40 to 50 days
6	Groundwater	Injection of zero valent iron at 33 locations	Every two years with first injection in 2021/ Until cleanup goals are achieved

PROJECT ACTIVITIES:

The IRAP proposes the following activities:

1. Concrete removal, soil excavation and backfilling – concrete will be removed first and soil will then be removed using bucket auger drill rigs. The use of bucket auger borings will ensure the safety of the building structures. It will also allow the contractor to excavate relatively rapidly to a depth of 30 feet below ground surface (bgs), where possible, thus limiting the quantity of nuisance water from the A-Zone aquifer. Engineered setbacks from the exterior walls will have to be established by a licensed engineer. These setbacks will likely require a 2-foot setback from the walls, and then excavating relatively narrow slots (trenches) or bucket auger borings to the desired depths. An estimated 10 borings will be completed per day per drill rig. The bucket auger borings will have a diameter of 3 feet for excavation within the buildings and a diameter of 4 feet for excavation outside the buildings. The auger borings will overlap approximately 0.5 feet in an effort to remove all impacted soils. In order to limit disturbance to the wall footings, every 5th auger boring will initially be drilled adjacent to the building. These borings will be backfilled with cement slurry and prior to resuming augering.

ChiaRin Yen

2. Soil Stockpiling and Transportation – Excavated soil will be stockpiled in an area determined by the excavation contractor and within the Project Site (e.g., the parking area). The stockpiled soil will be placed on plastic sheeting for a maximum of seven days and covered with plastic sheeting which will be anchored down in order to protect against rain, wind, and potential odors. Temporary fencing will be placed around the stockpiles when not being accessed. All stockpiled soil will be characterized prior to its offsite disposal.

3. In-Situ Chemical Injection - The VOCs in groundwater and saturated soil will be treated in-situ by injecting zero valent iron to reduce VOCs (mainly PCE an TCE) to harmless chemicals. Eleven onsite injection locations and 22 offsite injection locations will be spaced 6 feet apart from each other. The proposed injection depths for the onsite injection locations will be between 30 and 40 and the proposed injection depths for the offsite locations will be between 20 and 50 feet. The injection will be conducted periodically, approximately every 2 years, and when the funding is available. The injection locations may vary pending the groundwater monitoring results.

4. Groundwater Monitoring – Groundwater monitoring will be continued using the existing 30 monitoring wells until the Project Site meets the cleanup goals. These wells are screened within three different depths (3-18 feet bgs, 31-45 feet bgs, and 48-60 feet bgs). Sixteen (16) of these wells are located within the Project Site and fourteen (14) are located down-gradient of the Project Site. Additional wells may be installed for the purpose of monitoring the groundwater including immediately down-gradient of the treated area.

5. Institutional Controls – A land use covenant will be recorded to restrict the Project Site to commercial/industrial use and prohibit groundwater use as several VOCs (tetrachloroethene, trichloroethene, 1,1 -dichloroethene (DCE), cis-1,2-DCE, trans 1,2-DCE, 1,1-dichloroethane (DCA), 1,2-DCA, 1,1,2-trichloroethane and 1,4-dioxane) exceed the maximum contaminant levels.

PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED: (e.g., State Agencies, Counties, Cities, or Air Quality Districts, granting permits, financing approval, or participation agreement.)

The approval from the following agencies would be required prior to the IRAP implementation:

- Excavation and grading permit from City of Santa Ana
- Waste permit to inject materials into the underlying soil and groundwater by the Santa Ana Regional Water Quality Control Board
- Mitigation plan per Rule 1166 by South Coast Air Quality Management District (AQMD)

NATIVE AMERICAN CONSULTATION: 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.?

On November 25, 2020, DTSC formally notified the 11 tribes identified in the National American Heritage Commission (NAHC) listing and DTSC has not received any responses to the AB52 Consultation letter by February 2, 2021.

Note: Please see the Tribal Cultural Resources Section (Section 18) for additional information.

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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 beginning on page 6. Please see the checklist beginning on page 6 for additional information.

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

DETERMINATION

On the basis of this initial evaluation:

☒	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.

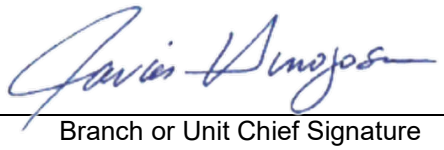
CERTIFICATION

I hereby certify that the statements furnished above and in the attached documentation, present the data and information required for this initial study evaluation to the best of my ability and that the facts, statements and information presented are true and correct to the best of my knowledge and belief.

Chia Rin Yen
Preparer's Signature

4/21/2021
Date

Chia Rin Yen	Environmental Scientist	714-484-5392
Preparer's Name	Preparer's Title	Phone #



Branch or Unit Chief Signature	Date
	04/21/2021

Branch or Unit Chief Name	Branch or Unit Chief Title	Phone #
Javier Hinojosa	Environmental Program Manager I	714-715-8025

EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance

ENVIRONMENTAL IMPACT ANALYSIS

1. AESTHETICS				
Except as provided in Public Resources Code Section 21099, would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
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 a 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?	☐	☐	☐	☒
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

California Scenic Highway Program

The Scenic Highway Program allows county and city governments to apply to the California Department of Transportation (Caltrans) to establish a scenic corridor protection program which was created by the Legislature in 1963. Its purpose is to protect and enhance the natural scenic beauty of California highways and adjacent corridors through special conservation treatment.

City of Santa Ana General Plan, January 2020 – Scenic Corridors Element

The Scenic Corridors Element within the 2020 City of Santa Ana General Plan has identified the following policies:

- Ensure that development within scenic corridors takes place at a scale and is designed to that aesthetic features are consistent with the function of scenic corridors as part of the Framework Plan.
- Ensure that development in the Downtown/Civic Center area and adjacent neighborhoods is planned so as to reinforce or create scenic linkages.
- Ensure that development surrounding key historic sites, recreation and open space areas and circulation corridors is planned so as to reinforce or create scenic linkages in these areas.
- Integrate bicycle and pedestrian trails in scenic corridors where possible.
- Utilize the Capital Improvements Program to systematically upgrade the visual appeal of the City's streetscapes.

ENVIRONMENTAL SETTING (BASELINE):

The Project Site is located in Santa Ana, which is the fifth largest Orange County city in terms of land area. It consists of 27.3 square miles. Of this total, 58 percent is devoted to residential development, 15 percent to commercial uses, 14 percent to industrial, 11 percent to public and institutional uses, and 2 percent to public parkland and open space.

The area surrounding the site consists of mixed commercial, industrial, and residential land uses. Residential land is located immediately west of the Project Site and Standard Avenue. The properties located north, east, and south of the Project Site are in light industrial or commercial use.

The subject Project Site is located west of Freeway 55 and north of Freeway 405. These freeways are not designated as scenic highways based on the California Scenic Highway Mapping System (https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways) provided by California Department of Transportation.

With the exception of landscape islands in the onsite parking lot and a lawn located west of Building A, the Project Site is covered by concrete pavement.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The project is determined to be significant if it would have a substantial adverse effect on a scenic vista; substantially degrade the existing visual character or aesthetic quality of the site and its surroundings; substantially increase the effect of light and glare upon existing uses; and/or result in substantial terrain modifications.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

No project-specific environmental studies related to aesthetic resources were prepared for the project. Readily available information was reviewed for this assessment.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

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

Impact Analysis:

There are no scenic vistas in the immediate Project Site vicinity. The implementation of the soil excavation and in-situ chemical injection would be limited within the Project Site's boundary and possibly an adjoining area within the neighboring industrial property. No new and permanent above ground structures or modifications to existing structures would occur with implementation of the project. Its implementation would not obstruct scenic resources or degrade the existing visual character of the area. Further, the implementation of the proposed project would not contribute additional light or glare within the project area as all excavation and injection activities would be implemented and monitored during daylight hours (7 a.m. to 4 p.m.).

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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

Impact Analysis:

There are no scenic resources within the immediate project area, including trees, rock outcroppings, and historic buildings.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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?

Impact Analysis:

The Project Site is located in an urbanized area and the project is to excavate the contaminated soil and inject chemicals to groundwater for remediation. There is no change in the zoning and other regulations related to scenic quality.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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

Impact Analysis:

The project activities would be conducted during daytime hours (7 a.m. to 5 p.m.) during the second or third quarter of the year and would not require any nightshift or swing-shift work.

Conclusion:

☒ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

California Department of Transportation (Caltrans), Orange County State Scenic Highways Map (https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways); accessed online July 2020.

City of Santa Ana General Plan, Land Use Element (https://www.santa-ana.org/general-plan/current-general-plan), dated January 2010; accessed online July 2020.

Google Earth; accessed online July 2020.

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 Dept. 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:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
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?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
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))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

Farmland Protection Policy Act

The U.S. Department of Agriculture (USDA) administers the Farmland Protection Policy Act of 1981. The act is intended to minimize the extent to which federal programs contribute to the unnecessary conversion of farmland to nonagricultural uses. The act also requires these programs to be compatible with state, local, and private efforts to protect farmland.

California Civil Code Section 3482.5 (Right to Farm Act)

The Right to Farm Act is designed to protect commercial agricultural operations from nuisance complaints that may arise when an agricultural operation is conducting business in a "manner consistent with proper and accepted customs." The code specifies that established operations that have been in business for three or more years that were not nuisances at the time they began are not to be considered a nuisance as a result of a new land use.

California Land Conservation Act (Williamson Act)

The Williamson Act of 1965 was designed as an incentive to retain prime agricultural land and open space in agricultural use, thereby slowing its conversion to urban and suburban development. The program requires a 10-year contract between the county and the landowner. While in contract, the land is taxed on the basis of its agricultural use rather than its market value. The land becomes subject to certain enforceable restrictions, and certain conditions need to be met prior to approval of an agreement. The goal of the Williamson Act is to protect agriculture and open space. The Project Site is not covered by Williamson Act or Farmland Security Zone contract. Therefore, no such contract aimed at retaining prime agricultural land and/or open space as agricultural use in order to slow its conversion to urban and suburban development affects the Project Site.

California Land Evaluation Site Assessment Model (LESA)

The USDA National Resources Conservation Service (NRCS) developed the LESA to assist state and local officials in making sound decisions regarding land use. Combined with forest measures and rangeland parameters, a LESA can provide a technical framework to numerically rank land parcels through local resource evaluation. In determining whether impacts to agricultural resources are significant environmental effects, the CEQA Guidelines reference the California Agricultural LESA Model prepared by the California Department of Conservation (DOC) as an optional methodology that may be used to assess the relative value of agriculture and farmland. The Project Site does not include existing agriculture or farmland.

Farmland Mapping and Monitoring Program (FMMP)

The FMMP, established in 1982, and implemented by and mapped by the California DOC, produces maps and statistical data used for analyzing impacts to the state's agricultural resources. Agricultural land is rated according to soil quality and irrigation status, with the best quality land called Prime Farmland. Maps are updated every two years, with current land use information gathered from aerial photographs, a computer mapping system, public review, and field reconnaissance. The minimum mapping unit is 10 acres. The DOC Prime Farmlands, Farmlands of Statewide Importance, and Unique Farmlands are referenced in CEQA Guidelines Appendix G as resources to consider in an evaluation of agricultural impacts. The Project Site does not include existing agriculture or farmland.

ENVIRONMENTAL SETTING (BASELINE):

According to the Santa Ana General Plan and the Farmland Mapping and Monitoring Project (FMMP), the City of Santa Ana does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance parcels.

The Project Site is located in an industrialized area of Santa Ana. It has been used for industrial purposes since 1954 and.is mostly paved, with the exception of landscaped islands within the parking lot and a lawn west of Building A. The Project Site and its vicinity are not located in an agricultural resource area; therefore, no impact would occur. No further analysis is deemed necessary.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The project is determined to be significant if it permanently affects agricultural resources.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the lack of agricultural or forestry resources in or near the Project Site, no environmental studies relating to agriculture or forestry resources were prepared for the project. Readily available information was reviewed for this assessment.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

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?

   Impact Analysis:

See Environmental Setting (Baseline).

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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

Impact Analysis:

See Environmental Setting (Baseline).

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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))?

Impact Analysis:

See Environmental Setting (Baseline).

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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

Impact Analysis:

See Environmental Setting (Baseline).

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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

Impact Analysis:

See Environmental Setting (Baseline).

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

City of Santa Ana General Plan, Land Use Element (https://www.santa-ana.org/general-plan/current-general-plan), dated January 2010; accessed online July 2020.

California Department of Conservation, Farmland Mapping & Monitoring Program, (https://www.conservation.ca.gov/dlrp/fmmp); accessed online October 2020.

Google Earth; accessed online October 2020.

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:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
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?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

The Project Site is located within the South Coast Air Basin (SCAB). The SCAB includes Orange County and portions of Los Angeles, Riverside, and San Bernardino counties. Air quality in the SCAB is regulated at the federal level by U.S. Environmental Protection Age (USEPA), at the state level by California Air Resources Board (CARB), and at the local level by the South Coast Air Quality Management District (SCAQMD). The South Coast Air Quality Management District (SCAQMD) published a Thresholds of Significance revised in April 2019 to assist lead agencies in evaluating air quality impacts of projects and plans proposed in the areas within the South Coast Air Basin (SCAB).

Air Pollutants of Concern

Individual air pollutants at certain concentrations may adversely affect human or animal health, reduce visibility, damage property, and reduce the productivity or vigor of crops and natural vegetation. Six air pollutants have been identified by the USEPA and the CARB as being of concern both on a nationwide and statewide level: ozone; carbon monoxide (CO); nitrogen dioxide (NO_2); sulfur dioxide (SO_2); lead; and particulate matter (PM), which is subdivided into two classes based on particle size: PM equal to or less than 10 micrometers in diameter (PM10) and PM equal to or less than 2.5 micrometers in diameter (PM2.5). Because the air quality standards for these air pollutants are regulated using human health and environmentally based criteria, they are commonly referred to as “criteria air pollutants.”

Attainment of Federal and State Air Quality Standards

Areas are classified under the Federal Clean Air Act and California Clean Air Act as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the federal and state air quality standards have been achieved. With respect to National Ambient Air Quality Standards (NAAQS), the SCAB is designated nonattainment area for ozone and PM2.5, and as an attainment or unclassified area for all other pollutants. With respect to the California Ambient Air Quality Standards (CAAQS), the SCAB is designated as a nonattainment area for ozone, PM10, and PM2.5, and as an attainment area for all other pollutants.

Toxic Air Contaminants

USEPA and CARB regulate hazardous air pollutants, also known as toxic air contaminants (TACs). TACs collectively refer to a diverse group of air pollutants that are capable of causing chronic (i.e., long-duration) and acute (i.e., severe but short-term) adverse effects on human health, including carcinogenic effects. TAC can be separated into carcinogens

and noncarcinogens based on the nature of the effects associated with exposure to the pollutant. For regulatory purposes, carcinogens are assumed to have no safe threshold below which health impacts would not occur. Any exposure to a carcinogen poses some risk of contracting cancer. Noncarcinogens differ in that there is generally assumed to be a safe level of exposure below which no negative health impact is believed to occur. These levels are determined on a pollutant-by-pollutant basis.

Federal Clean Air Act and National Ambient Air Quality Standards

National air quality policies are regulated through the Federal Clean Air Act (CAA). Pursuant to the CAA, the USEPA has established nationwide air quality standards to protect public health and welfare with an adequate margin of safety. The NAAQS represent safe levels of each criteria pollutant to avoid specific adverse effects to human health and the environment. Two types of NAAQS have been established, primary and secondary standards. Primary standards set limits to protect public health, especially that of sensitive populations such as asthmatics, children, and seniors. Secondary standards set limits to protect public welfare, including protections against decreased visibility and damage to animals, crops, and buildings.

The CAA was amended in 1977 to require each state to maintain a State Implementation Plan (SIP) for achieving compliance with the NAAQS. In 1990, the CAA was amended again to strengthen regulation of both stationery and motor vehicle emission sources. Conformity to the SIP is defined under the 1990 CAA amendments as conformity with the SIP's purpose in eliminating or reducing the severity and number of violations of the NAAQS and achieving expeditious attainment of these standards.

California Clean Air Act and California Ambient Air Quality Standards

In 1988, the state legislature adopted the California CAA, which established a statewide air pollution control program. The California CAA requires all air districts in the state to endeavor to meet CAAQS by the earliest practical date. Unlike the federal CAA, the California CAA does not set precise attainment deadlines. Instead, the California CAA establishes increasingly stringent requirements for areas that will require more time to achieve the standards. CAAQS are generally more stringent than NAAQS and incorporate additional standards for sulfates, hydrogen sulfide, visibility-reducing particles, and vinyl chloride. CAAQS and NAAQS are listed together in Table 3-1.

CARB and local air districts bear responsibility for achieving California's air quality standards, which are to be achieved through district-level air quality management plans to be incorporated into the SIP. In California, the USEPA has delegated authority to prepare SIPs to CARB, which, in turn, has delegated that authority to individual air districts. CARB establishes state air quality standards, maintains oversight authority in air quality planning, develops programs for reducing emissions from motor vehicles, develops air emission inventories, collects air quality and meteorological data, and approves SIPs.

South Coast Air Quality Management District

In the SCAB, the SCAQMD is the agency responsible for protecting public health and welfare through the administration of federal and state air quality laws and policies. Included in the SCAQMD's tasks are monitoring of air pollution, preparation of air quality plans, and promulgation of rules and regulations.

Under the California CAA, the SCAQMD is required to develop an air quality attainment plan for nonattainment criteria pollutants within the air district. The most recent air quality plan developed by the SCAQMD is the 2016 Air Quality Management Plan (AQMP). The 2016 AQMP is the legally enforceable blueprint for how the region will meet and maintain the NAAQS and CAAQS. The 2016 AQMP identifies strategies and control measures needed to achieve attainment of the 8-hour ozone standard and federal annual and 24-hour standard for PM2.5 in the SCAB. SCAQMD rules relevant to the proposed project include, but are not limited to:

- SCAQMD Rule 403 - requires the implementation of best available dust control measures (BACM) during active operations capable of generating fugitive dust in the ambient air.

- SCAQMD Rule 1466 - requires dust control measures to minimize off-site fugitive dust emissions from earth-moving activities at sites containing specific toxic air contaminants.

- SCAQMD Rule 1166 - requires a mitigation plan (approved by SCAQMD) to control the emission of VOC from excavating, grading, handling and treating VOC contaminated soil as a result of leakage from storage or transfer operations, accidental spillage, or other deposition categories.

ENVIRONMENTAL SETTING (BASELINE):

The Project Site is located in a disturbed and developed urban area within the SCAB and is subject to the regulations of the SCAQMD. The SCAB is currently classified as a non-attainment area for the Federal 8-hour ozone, particulate matter PM10 and PM 2.5 standards as shown in table (Table 1) below.

Table 1 - Attainment of Federal and State Air Quality Standards

Criteria Pollutant	State Attainment	Federal 8-hour
Ozone	Non-Attainment (NA)	NA
PM 10	NA	NA
PM 2.5	NA	NA
Carbon monoxide (CO)	Attainment (A)	Unclassified (U)
Nitrogen dioxide (NO_2)	A	U
Sulfur dioxide (SO_2)	A	A
Lead	A	A
Hydrogen sulfides	A	No standard
Visibility reducing particles	U	No standard

The implementation of the IRAP would generate pollutants during the transit of project support vehicles to and from the Project Site over the project duration. This will also occur during the use of drill rigs, earth moving equipment, dump trucks, and cement (slurry) trucks.

The proposed maximum equipment usage and duration of the IRAP implementation are expected for Phase 3 and to be the following:

- For excavation, one bucket auger drill rig, one loader, and dump trucks (estimated duration is 40 to 52 days)
- For soil removal, ten trucks for fifty-two days
- For backfilling, fourteen cement trucks for fifty-two days
- For the injection activities, one support truck and two direct-push drill rigs for ten days
- For well installation and development (if needed), one drill rig, a support truck, and a development rig for 1 day
- For monitoring well sampling, one truck for two days

Appendix A provides estimates of emissions from anticipated vehicle use for each soil excavation phase of the IRAP implementation. The implementation schedule of excavation phases will not be overlapped. The calculations indicate that the vehicles used within the Project Site and transit of vehicles to and from the Project Site during implementation of the IRAP are not a source of significant emissions. Emissions of all pollutants will be well below SCAQMD thresholds.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

As stated in Appendix G of the CEQA Guidelines, the significance criteria established by the applicable air quality management board or air pollution control district may be relied on to make the impact determinations for specific program elements. The SCAQMD has established recommended screening level thresholds of significance for regional and localized pollutant emissions.

SCAQMD Significance Thresholds

SCAQMD has established regional thresholds of significance to identify those projects that would result in significant levels of air pollution and to assist the region in attaining the applicable state and federal ambient air quality standards, which were established using health-based criteria to protect the public with a margin of safety from adverse health impacts due to exposure to air pollution. Because regional air quality standards have been established for these criteria pollutants to protect the public with a margin of safety from adverse health impacts due to exposure to air pollution, these thresholds of significance can also be used to assess project emissions and inform the project's impacts to regional air quality and health risks under CEQA. See Appendix B for the threshold of significance.

SCAQMD also developed localized significance thresholds (LSTs) for oxides of nitrogen (NOX), carbon monoxide (CO), PM10 and PM2.5. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor.

The SCAQMD threshold of significance, Mass Daily Threshold (MDT)] and Localized Significance Threshold (LST) for a site less than one-acre in size and the receptor distance is less than 25 meters from the Project Site boundary, are presented below (Table 2). The impacts are considered less than significant if the emissions are below these thresholds.

Table 2 - Maximum Daily Threshold and Localized Significance Threshold for Construction Activities

CRITERIA POLLUTANT OR PRECURSOR	SCAQMD MDT (lbs/day)	SCAQMD LST (lbs/day)
CO	550	485
NO_x	100	81
ROG	---	---
SO_x	150	---
PM10	150	1
PM2.5	55	3
CO_2	---	---
CH4	---	---

lb = pounds
MDT= Maximum Daily Threshold
LST= Localized Significance Threshold
NOx = nitrogen oxide
ROG = reactive organic gases
SOx = sulfur oxide
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
CO_2 = carbon dioxide
CH_4 = methane

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

California Emissions Estimator Model ® (CalEEMod, Version 2016.3.2) was run to determine if project-related air emissions exceed SCAQMD MDT and LST. The CalEEMod results and the model basis information is summarized in Appendix A. The following construction equipment was considered in modeling air emissions:

- Passenger cars (worker transportation),
- Loaders,
- Rollers,
- Dump truck
- Cement truck
- Drill rig
- Backhoe

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

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

Impact Analysis:

The South Coast Air Quality Management District (SCAQMD) is the applicable air quality management district having jurisdiction over the subject property. The project area is listed as Area 17 of the Coastal Region of Orange County. Emissions of all pollutants would be well below the MDT and LST established by SCAQMD for each phase of excavation (see Table 3). The project would not conflict with applicable air quality plan and project impacts are considered less than significant.

Table 3 Estimated Daily Emissions

CRITERIA POLLUTANT OR PRECURSOR	DAILY EMISSIONS (lbs/day)					SCAQMD MDT (lbs/day)	SCAQMD LST (lbs/day)
	Phase 1	Phase 2	Phase 3	Phase 4	Phase 5		
CO	29.40	30.54	29.32	29.39	29.36	550	485
NOx	30.27	31.41	30.18	30.25	30.22	100	81
ROG	4.49	4.66	4.48	4.49	4.48	---	---
SOx	0.10	0.11	0.01	0.10	0.10	150	---
PM10	1.28	1.33	1.28	1.28	1.28	150	1
PM2.5	0.99	1.03	0.99	0.99	0.99	55	3
CO2	10,450.0	10,849.0	10,419.2	10,443.6	10,432.6	---	---
CH4	0.20	0.21	0.20	0.20	0.197	---	---

lb = pounds
MDT= Maximum Daily Threshold
LST= Localized Significance Threshold
NOx = nitrogen oxide
ROG = reactive organic gases
SOx = sulfur oxide
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
CO_2 = carbon dioxide
CH_4 = methane

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

b. Result in 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.

Impact Analysis:

The proposed project will emit two criteria pollutants (PM10 and PM2.5) for which the project region is listed as "non-attainment" under Federal and State standards. The project's maximum estimated emission for PM10 is 1.33 lbs/day and maximum estimated emission for PM2.5 is 1.03 lbs/day.

The emissions would be well below the SCAQMD's MDT and LST and would not conflict or obstruct the implementation of the applicable air quality plan; therefore, project impacts are considered less than significant.

Conclusion: The project would not result in cumulatively net increase of any criteria pollutant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

c. Expose sensitive receptors to substantial pollutant concentrations?

Impact Analysis:

Sensitive receptors include residences, recreational areas, schools, hospitals, and day care centers. The nearest school, hospital, and day care center are located approximately 0.25 miles from the Project Site. Single-family residences are located at their closest 330 feet west of the project area. The closest school (James Monroe Elementary School) is located apprximately 1,900 feet southwest of the Project Site.

The proposed project is not expected to expose off-site sensitive receptors to substantial criteria pollutant concentrations because emissions are below the LSTs and MDT. Air emissions will be monitored and controlled as discussed in then IRAP:

Air Monitoring

Air monitoring will be conducted during all excavation-related activities that may potentially release fugitive vapors or particulate matter. This collected data will be used to assess if potential contaminants are being released from the excavation area, stockpile, or loading areas. It will also be used to assess the need for corrective actions. VOC and dust measurements will be conducted upwind and downwind of the excavation. The upwind and downwind air monitoring locations will be moved as needed during the workday when wind direction or the work location change. Due to the relatively small size of the auger boring (up to 4-foot diameters), only one air monitoring station will be located down-wind of the active excavation area. Monitoring stations will be placed every 20 feet along the down-wind side of the soil stockpiles. One monitoring station will also be placed downwind of the truck loading area. The monitoring stations will be placed approximately 20 feet from the potential VOC and dust sources.

Dust and Fugitive Emissions

The implementation of AQMD Rule 403 (dust suppression) is required during all excavation, stockpiling, and loading activities. Dust suppression measures will take place in order to control the off-site emissions of fugitive dust that may contain contaminants, per AQMD Rule 1466.

Dust emissions during excavation and loading activities are expected to be minimal due to the soil types (silt and clay) and moist conditions. These emissions will be reduced further by the implementation of dust suppression measures which include wetting of the excavated soil (as needed), covering of soil with plastic sheeting during periods of inactivity, and by the halting of excavation operations if the wind speeds exceed 20 miles per hour. All potential dust-producing activities shall cease until the sustained wind speed declines to 20 mph or lower. A meteorological station will be installed adjacent to the Project Site for assessing the wind speed, as well as the wind direction.

Vapor Emissions

Per AQMD Rule 1166, an approved mitigation plan is required prior to excavating soils that contain VOCs. This mitigation plan will be prepared and submitted by the excavation contractor. Per Rule 1166's soil monitoring requirements, a photoionization detector (PID) will be used to measure total VOC emissions during all excavation activities. In the event that VOC odors are detected and/or photoionization detector (PID) measurements of exposed soil exceed 5 ppm, VOC suppression measures will be conducted as stated in the Dust and Fugitive Emission section.

Offsite Transportation Of Impacted Soil

The transport trucks will have tarps that cover the soil during transit to provide adequate coverage in order to prevent the release of dust. Covers will be inspected to ensure that they are securely fastened and contain no holes before exiting the Project Site. In addition, the truck's exterior surfaces will be inspected and cleaned until they are visibly free of soil and any soils tracked offsite and onto the adjoining roadways will be routinely cleaned (e.g.,sweeping) and at the end of each shift or working day

With the implementation of the above control measures, exposure of sensitive receptors to substantial pollutant concentrations is not expected. Therefore, project impacts are considered less than significant.

Conclusion:

The project would not expose sensitive receptor to substantial pollutant concentrations.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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

Impact Analysis:

The planned remedial measures include the excavation and of soils impacted with VOCs. The air within the excavation will be continuously monitored during excavation activities as discussed previously. The IRAP specifies measures to be implemented in the event that the VOC concentrations are detectable either via olfactory senses or field instruments, the following measures would be implemented:

- Atomized mists containing water and chemical suppressants will be sprayed on the soil being excavated or placed on the stockpile;
- Excavation progress and activities may be slowed to reduce emissions; and
- Plastic sheeting and plywood will be placed over the auger borings when not being actively dug.

These measures are designed to prevent the release of odors and elevated VOC concentrations. The impact, therefore, is considered less than significant.

In addition to soil excavation, VOC-reducing compounds will be injected into the underlying aquifer and saturated soil to depths up to 50 feet. No odors will be created during injection activities.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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4. BIOLOGICAL RESOURCES				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
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 Wildlife, U.S. Fish and Wildlife Service, or NOAA Fisheries?	☐	☐	☐	☒
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 Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
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?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

Federal Endangered Species Act (16 U.S.C. 1531–1543)

The U.S. Fish and Wildlife Service (USFWS) and National Oceanic and Atmospheric Administration (NOAA) Fisheries oversee the Federal Endangered Species Act (FESA). The USFWS has jurisdiction over plants, wildlife, and resident fish; NOAA Fisheries has jurisdiction over anadromous fish, marine fish, and marine mammals. The FESA prohibits the take of any fish or wildlife species listed as endangered or threatened; requires that all federal agencies consult with the USFWS and/or NOAA Fisheries to ensure that federal agencies' actions do not jeopardize the continued existence of a listed species or adversely modify critical habitat for listed species; and issues permits to authorize the incidental take of listed species.

A federally endangered species is a species of invertebrate, plant, or wildlife formally listed under the FESA as facing extinction throughout all or a significant portion of its geographic range. A federally threatened species is one formally listed by the USFWS as likely to become endangered within the foreseeable future throughout all or a significant portion of its range. A proposed threatened or endangered species is one officially proposed by the USFWS for addition to the federal threatened or endangered species lists. Candidate species and species that are proposed for listing receive no protection under the FESA.

Migratory Bird Treaty Act (MBTA)

Congress passed the MBTA in 1918 to prohibit the kill or transport of native migratory birds, or any part, nest, or egg of any such bird unless allowed by another regulation adopted in accordance with the MBTA (U.S.C. Title 16, Chapter 7, Subchapter II, Sections 703–712). All birds, except European starlings, English house sparrows, rock doves (pigeons), and non-migratory game birds such as quail, pheasant, and grouse are protected under the MBTA. Game birds are regulated under state hunting permit programs.

California Endangered Species Act (Section 2050 et seq.)

California implemented its own Endangered Species Act (CESA) in 1984. The state act prohibits the take of state-listed endangered and threatened species; however, unlike the federal definition, habitat destruction or modification is not included in the state's definition of take. Section 2090 of CESA requires state agencies to comply with endangered species protection and recovery and to promote conservation of these species. The California Department of Fish and Wildlife (CDFW) administers the CESA and authorizes take through Section 2081 agreements (except for designated "fully protected species").

California Species of Special Concern (SSC) is an informal designation used by the CDFW for specific declining fish, amphibian, reptile, bird, and mammal species that are not listed as endangered, threatened, or rare under CESA. Other species in California for which there is conservation concern are tracked by in the California Natural Diversity Data Base (CNDDB). These designations do not provide legal protection but signifies that these species are recognized as vulnerable by CDFW and may receive special consideration during a CEQA review process.

In regard to listed rare and endangered plant species, the CESA defers to the California Native Plant Protection Act (NPPA) of 1977. The NPPA prohibits importing of rare and endangered plants into California, and the taking and selling of rare and endangered plants. The CESA includes an additional listing category for threatened plants which are not regulated under the NPPA. In this case, plants listed as rare or endangered under the NPPA are not protected under CESA but can be protected under CEQA. In addition, plants that are not state listed but meet the state standards for listing, are also protected under CEQA (Guidelines, Section 15380). In practice, this is generally interpreted to mean that all plant species designated with a California Rare Plant Rank (CRPR) of 1B and 2 by the California Native Plant Society (CNPS), qualify for protection under CEQA, as well as some species of plants with CRPR of 3 and 4. Species are ranked by CNPS in their Inventory of Rare and Endangered Plants of California.

Bird Protections

CFGC Section 3503, 3503.5, and 3505 set forth limits on take, possession, and destruction of certain avian species, their nests, and eggs. Section 3503 of the CFGC prohibits destruction of the nests or eggs of most native resident and migratory bird species. Section 3503.5 specifically prohibits the taking of raptors or destruction of their nests or eggs. CFGC 3511(a)(1) establishes that fully protected birds may not be taken or possessed at any time with the exception of permits granted for scientific research.

Under these sections of the CFCG, the project proponent is not allowed to conduct activities that would result in the taking, possessing, or destroying of any birds-of-prey, taking, or possessing of any migratory non-game bird as designated in the MBTA or the taking, possessing, or needlessly destroying of the nest or eggs of any raptors or non-game birds protected by the MBTA, or the taking of any non-game bird pursuant to CFGC Section 3800.

Natural Community Conservation Plan/Habitat Conservation Plan Programs

The CDFW's Natural Community Conservation Planning (NCCP) Program promotes collaborative planning efforts designed to provide for the region-wide conservation of plants, animals, and their habitats, while allowing for compatible and appropriate economic activity. Similarly, and generally in parallel, the USFWS implements the Habitat Conservation Plan program which are planning documents required as part of an application for an incidental take permit. These plans describe the anticipated effects of the proposed take; how those impacts will be minimized or mitigated; and how the HCP is to be funded. HCPs can apply to both listed and non-listed species, including those that are candidates or have been proposed for listing. Conserving species before they are in danger of extinction or are likely to become so can also provide early benefits and prevent the need for listing.

ENVIRONMENTAL SETTING (BASELINE):

According to the City of Santa Ana General Plan, Land Use Element, a review of the Natural Diversity Database indicated that sensitive species are limited to a possible occurrence of the San Diego Horned Lizard which is apparently found throughout the region but is restricted in range. The San Diego Horned Lizard was last sighted in 1922 in the northern section of Santa Ana, and is still presumed to be in existence today.

The Project Site is bordered on all sides by industrial properties and a paved roadway. It is located approximately 3.5 miles east of the Santa Ana River. The Santa Ana River is channelized and does not provide habitat to riparian species.

The project area is located within the central portion of an industrial property, within a concrete-paved area between two buildings. There are no habitats for biological resources near or within the project area. Therefore, no further analysis of this impact is deemed necessary

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The project is determined to be significant if it would:

- 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 CDFG or USFWS;
- 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 CDFG or USFWS;
- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
- 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;
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; and/or
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

No environmental studies were performed previously. City of Santa Ana General Plan, Land Use Element was used to establish whether there are any biological resources in the city.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

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?

Impact Analysis:

See Environmental Setting (Baseline).

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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

Impact Analysis:

See Environmental Setting (Baseline).

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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?

Impact Analysis:

See Environmental Setting (Baseline).

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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?

Impact Analysis:

As proposed in the IRAP, if the excavation is conducted during the nesting season (generally February 15th through August 15th), a nesting bird survey of mature trees adjacent to the Project Site would be performed by a qualified biologist 72 hours prior to excavation. If nesting birds are detected, the qualified biologist shall establish an appropriate buffer zone where construction activity may not occur until the fledglings have vacated the nest or the qualified biologist has determined that the nest has failed. If nesting birds are not detected during the survey, then excavation can proceed as planned.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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

Impact Analysis:

See Environmental Setting (Baseline).

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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?

Impact Analysis:

See Environmental Setting (Baseline).

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

Black Rock Geosceinces, 2021, Interim Remedial Action Plan, Former Dicoen Electronics Facility, 2215 South Standard Avenue, Santa Ana, California , revised March 2021.

City of Santa Ana General Plan, Land Use Element (https://www.santa-ana.org/general-plan/current-general-plan), dated January 2010; accessed online July 2020.

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

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

California Register of Historical Resources

The California Register was created to identify resources deemed worthy of preservation on a state level and was modeled closely after the National Register of Historic Places. Resources listed on the National Register are automatically listed on the California Register.

Historic properties and resources are protected pursuant Section 106, Protection of Historic Properties (36 CFR 800) and Regulatory Historic Property Regulations (33 CFR 325, Appendix C). Cultural and paleontological resources receive protection pursuant to CEQA. Native American internments and associated funerary objects received additional protection with Public Resources Code 5097.98.

ENVIRONMENTAL SETTING (BASELINE):

According to the City of Santa General Plan and a response from the South Central Costal Information Center (See Appendix C), there is no cultural resource within a ½ mile radius of the Project Site. The Project Site has been used as an industrial site since approximately 1954, and no known cultural resources are located on the property**.**

Although no archaeological sites have been identified within approximately a 1/2-mile radius of the Project Site, the IRAP propose that if archaeological resources are discovered during excavation, then excavating will stop until a qualified archaeologist or appropriately licensed professional can assess the significance of the find and, if necessary, develop appropriate response measures in consultation with the DTSC, other agencies and Native American representatives. If human remains are encountered, excavating will stop and the County Coroner will be immediately notified. Work will not continue until the County Coroner has made a determination of origin and disposition. If the remains are determined to be Native American, the Coroner will notify the Native American Heritage Commission and the County Coordinator of Indian Affairs.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The project is determined to be significant if the proposed plan would:

- Cause a substantial adverse change in the significance of an historical resource as defined in Section 15064.5 of the CEQA Guidelines;
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines;
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; or
- Disturb any human remains, including those interred outside of formal cemeteries.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the lack of the cultural resources in the area, no environmental studies related to cultural resources were performed. City of Santa Ana General Plan, Land Use Element was used to identify cultural resources in the city.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Cause a substantial adverse change in the significance of a historical resource pursuant to in §15064.5?

Impact Analysis:

See Environmental Setting (Baseline).

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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

Impact Analysis:

See Environmental Setting (Baseline)

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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

Impact Analysis:

See Environmental Setting (Baseline).

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

Black Rock Geosceinces, 2021, Interim Remedial Action Plan, Former Dicoen Electronics Facility, 2215 South Standard Avenue, Santa Ana, California , revised March 2021.

City of Santa Ana General Plan, Land Use Element (https://www.santa-ana.org/general-plan/current-general-plan), dated January 2010; accessed online July 2020.

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

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

Energy Policy and Conservation Act of 1975

The Energy Policy and Conservation Act of 1975 established the first fuel economy standards for on-road motor vehicles sold in the United States.

National Energy Act of 1978

The National Energy Act of 1978 includes the Public Utility Regulatory Policies Act (Public Law 95-617), Energy Tax Act (Public Law 95-318), National Energy Conservation Policy Act (Public Law 95-619), Power Plant and Industrial Fuel Use Act (Public Law 95-620), and Natural Gas Policy Act (Public Law 95-621). The intent of the National Energy Act was to promote greater use of renewable energy, provide residential consumers with energy conservation audits to encourage slower growth of electricity demand, and promote fuel efficiency.

Energy Policy Acts of 1992 and 2005

The Energy Policy Act of 1992 was enacted to reduce dependence on imported petroleum and improve air quality by addressing all aspects of energy supply and demand, including alternative fuels, renewable energy, and energy efficiency. The Energy Policy Act of 2005 was enacted to set federal energy management requirements for energy-efficient product procurement, energy savings performance contracts, building performance standards, renewable energy requirements, and use of alternative fuels.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act was enacted to increase the production of clean renewable fuels; increase the efficiency of products, buildings, and vehicles; improve the federal government's energy performance; and increase U.S. energy security, develop renewable fuel production, and improve vehicle fuel economy.

Executive Order 13514, Federal Leadership in Environmental, Energy, and Economic Performance (Title 3, Section 13514 of the Code of Federal Regulations)

The executive order set sustainability goals for federal agencies and focuses on improving their environmental, energy, and economic performance. The executive order required agencies to meet a number of energy, water, and waste reduction targets.

Renewable Fuel Standard Program

Created by the Energy Policy Act of 2005, which amended the Clean Air Act, the Renewable Fuel Standard Program established requirements to replace certain volumes of petroleum-based fuels with renewable fuels. The 2007 Energy Independence and Security Act expanded the program and its requirements to include long-term goals of using 36 billion gallons of renewable fuels and extending annual renewable-fuel volume requirements to year 2022.

Senate Bills 1078 and 107, Executive Orders S-14-08 and S-21-09, and Senate Bill 100

Senate Bill (SB) 1078 (Chapter 516, Statutes of 2002) required retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017. SB 107 (Chapter 464, Statutes of 2006) changed the target date to 2010. Executive Order S-14-08 expanded the state's Renewables Portfolio Standard (RPS) to 33 percent renewable power by 2020. Executive Order S-21-09 directs the CARB, under its AB 32 authority, to enact regulations to help the state meet its RPS goal of 33 percent renewable energy by 2020. This was followed by SB 100 in 2018, which further increased the RPS to 60 percent by 2030 and added the requirement that all state's electricity come from carbon-free resources by 2045.

California Green Building Standards Code

In January 2010, the State of California adopted the California Green Building Standards Code (CalGreen), which establishes mandatory green building standards for all buildings in California. These standards include a set of minimum requirements and more rigorous voluntary measures for new construction projects to achieve specific green building performance levels. This code went into effect as part of local jurisdictions' building codes on January 1, 2011. The latest standards, 2019 CalGreen, becomes effective January 1, 2020.

ENVIRONMENTAL SETTING (BASELINE):

Electrical service to the City is provided by Southern California Edison (SCE), which operates a comprehensive system of power generating transmission facilities. Utility easements and lines are located throughout the City providing electrical service to every parcel of land in the City.

Energy consumption during project would involve energy used by drill rigs, haul trucks, and workers' commute vehicles. Drill rigs would primarily use diesel fuel, while work trucks (pickups) and personal vehicles used for commuting would primarily be gasoline-fueled. The project would not involve energy use from the onsite provider.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The project is determined to be significant there is a permanent adverse effect due to wasteful consumption of energy resources.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the lack of significant increase in energy demand from the Project Site, no environmental studies relating to energy resources were prepared for the proposed project

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

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

   Impact Analysis:

   See Environmental Setting (Baseline).

   Conclusion:

   ☐ Potentially Significant Impact

   ☐ Less Than Significant With Mitigation Incorporated

   ☐ Less Than Significant Impact

   ☒ No Impact

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

   Impact Analysis:

See Environmental Setting (Baseline).

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

City of Santa Ana General Plan, Land Use Element (https://www.santa-ana.org/general-plan/current-general-plan), dated January 2010; accessed online July 2020.

7. GEOLOGY AND SOILS				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
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.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

National Earthquake Hazards Reduction Program Reauthorization Act of 2004

The Earthquake Hazards Reduction Act {(Public Law 95-124, 42 U.S.C. 7701 et. seq.), as amended by Public Laws 101614, 105-47, 106-503, and 108-360.} was enacted in 1977 to “reduce the risks to life and property from future earthquakes in the United States through the establishment and maintenance of an effective earthquake hazards and reduction program.” To accomplish this, the Act established the National Earthquake Hazards Reduction Program.

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act (Public Resources Code Section 2621-2624, Division 2, Chapter 7.5) was enacted in 1972 to address the hazard of surface faulting to structures for human occupancy. The primary purpose of the Alquist-Priolo Earthquake Fault Zoning Act is to prevent the construction of buildings intended for human occupancy on the surface traces of active faults. Local agencies must enforce the Alquist-Priolo Earthquake Fault Zoning Act in the development permit process, where applicable, and may be more restrictive than state law requires. A 50-foot building setback from any known trace of an active fault is required. The Alquist-Priolo Earthquake Fault Zoning Act and its regulations are presented in California Department of Conservation, California Geological Survey, Special Publications (SP) 42, Fault-rupture Hazard Zones in California.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act of 1990 (Public Resources Code Section 2690-2699) addresses the effects of strong ground shaking, liquefaction, landslides, and other ground failures due to seismic events. Under the Seismic Hazards Mapping Act, the State Geologist is required to delineate “seismic hazard zones.” Under Public Resources Code Section 2697, cities and counties shall require, prior to the approval of a project located in a seismic hazard zone, a geotechnical report defining and delineating any seismic hazard.

Title 24 California Building Standards Code

The California Buildings Standards Commission is responsible for coordinating, managing, adopting, and approving building codes in California. On July 1, 2014, the 2013 California Building Standards Code (CBSC) became effective and updated all prior codes under California Code of Regulations (CCR) Title 24. The State of California provides minimum standards for building design through the 2013 California Building Code (CBC), a component of the 2013 CBSC. Chapters 16 through 18 of the 2013 CBC regulate structural design, structural tests and inspections, and soils and foundations. The CBC applies to building design and construction in the state and is based on the federal Uniform Building Code (UBC), which is used widely throughout the country (generally adopted on a state by state or district by district basis). The CBC, which has been modified for California conditions, contains numerous provisions that are more stringent than those in the UBC because of California’s seismic and environmental conditions.

ENVIRONMENTAL SETTING (BASELINE):

The Project Site is located within the Tustin Plain, near the southeastern end of the broad, low-lying Coastal Plain of Orange County, in the floodplain of the Santa Ana River and tributaries. Upland areas surrounding the Tustin Plain include the San Joaquin Hills to the southwest, the Newport Mesa to the south, the foothills to the Santa Ana Mountains to the northeast, and foothills to the Chino Hills to the north. These highlands have been uplifted in response to hundreds of thousands of years of seismic activity along earthquake faults.

The Tustin Plain is underlain by a thick sequence of alluvial sediments transported and deposited by the Santa Ana River, Santiago Creek, Peters Canyon Wash, Rattlesnake Canyon Wash, San Diego Creek and other smaller drainages. These sediments are relatively flat-lying, and unconsolidated to semiconsolidated, with density and age increasing with increasing depth. The older deposits, at depth, have been folded so as to form the northwest-trending Southgate/Santa Ana syncline; this fold developed primarily during the Pliocene (from: California Department of Water Resources’ Bulletin No. 104 – Planned Utilization of the Ground Water Basins of the Coastal Plain of Los Angeles County, Dated June 1961 [reprinted May 1991]). The northeastern limb is bounded by the Santa Ana Mountains and other hills to the north and northeast of the Project Site. The coastal sediments were further faulted and folded during the Pleistocene and Recent (Holocene) time periods in response to movement on the Newport-Inglewood and other faults at the base of the highlands such as the San Joaquin Hills, Newport Mesa, the Peralta Hills, and Coyote Hills, to mention a few.

No active, potentially active, or inactive faults are known to extend through the Project Site or in the immediate site vicinity. The faults closest to the Project Site include the San Joaquin Hills thrust, Newport-Inglewood, and Puente Hills thrust faults. All three of these faults are located 10 or less miles from the Project Site, and can generate strong ground shaking at the Project Site. The San Joaquin and Puente Hills thrust faults are anticipated to generate the strongest ground shaking in the Project Site area if they rupture in an earthquake. All three of these faults are considered capable of generating earthquakes of magnitudes between about 6.9 and 7.5.

The soils beneath the Project Site have been assessed with data collected from 57 borings at depths of up to 70 feet. Soils between the Project Site’s surface and approximately 31 feet below ground surface (bgs) are generally comprised of clay and silt. Thin water-bearing lenses of sandy silt and sandy clay are commonly encountered from 3 to 10 feet bgs, and again from 20 to 21 feet bgs. The soils between approximately 31 and 45 feet are typically

comprised of silty fine sand, with intermittent layers of silt and clay that are 1 to 3 feet in thickness. Sediments encountered between 48 and at least 70 feet are comprised primarily of saturated fine- to medium-grained sand.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The project is determined to be significant if it would:

- Expose people or structures to potential substantial adverse effects including the risk of loss, injury, or death involving:
  - 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 evidence of a known fault.
  - Strong seismic ground shaking.
  - Seismic related ground failure including liquefaction.
  - Landslides.
- Result in substantial erosion, loss of topsoil, changes in topography or unstable soil conditions from excavation, grading, or filling;
- Be located on a geological 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;
- Alter or destroy a unique geological feature; or
- Be located on expansive soils, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

No previous Environmental Studies were performed for the Project Site. Readily available information was reviewed for this assessment.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

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.

Impact Analysis:

The Alquist-Priolo Earthquake Fault Zoning Act was passed to prevent construction of buildings used for human occupancy on the surface of active faults. Development sites within an Alquist-Priolo Earthquake Fault Zone are threatened by surface rupture from future earthquakes. The Project Site is not located within an Alquist-Priolo Earthquake Zone and the proposed project does not include construction of buildings for human occupancy. The proposed project is limited to the excavation up to 50 feet deep using bucket auger drill rigs, backfilling, and paving of surface. It would not cause rupture of a known earthquake fault; therefore, there would be no impact.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

ii) Strong seismic ground shaking?

Impact Analysis:

The Project Site is located in a seismically active area is still susceptible to ground shaking emanating from causative faults during an earthquake. The project activities would occur outdoors with easy access to open areas and the workers would be present at the Project Site for limited duration. Therefore, the risk of loss, injury, or death from strong seismic ground shaking would be negligible.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less Than Significant Impact
☐ No Impact

iii) Seismic-related ground failure, including liquefaction?

Impact Analysis:

Ground failure as a result of fault rupture is not anticipated at the Project Site given that no known faults extend under or near the Project Site. The Project Site is located in an area identified as being susceptible to liquefaction. Liquefaction occurs in saturated sandy and silty deposits when subjected to strong ground shaking and if groundwater is within 50 feet of the ground surface. The silty and sandy layers that underlie the Project Site could liquefy when shaken. However, because these layers tend to be laterally discontinuous, the hazard of liquefaction-induced ground failure is considered relatively low. Replacement of the soils with cement or clean soil as part of the implementation of this proposed project would not increase the Project Site's liquefaction susceptibility. The probability of liquefaction occurring at the Project Site is therefore considered less than significant.

Project Site workers would be present for the short project duration (40 to 50 days), therefore the potential for substantial risk or injury to people would be limited. In addition, the soil excavation will be limited to boring drilling and placement of cover. The proposed project would not expose people or structures to significant impacts from seismic-related ground failure, including liquefaction.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less Than Significant Impact
☐ No Impact

iv) Landslides?

Impact Analysis:

The Project Site is located within an industrial area that is very flat. There are no hillsides within the vicinity of the subject Project Site.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis:

Soil will be exposed following the temporary removal of the overlying concrete; however, the exposed area would be paved and no substantial soil erosion or loss of top soil is expected.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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?

Impact Analysis:

The Project Site is not located in an area that is considered to have landslide, lateral spreading, or subsidence related hazards. The proposed project would not include the construction of any new permanent structures that would be used for human occupancy.

There is a potential for the sidewall soils to collapse into the deeper excavations. This potential, however, is considered less than significant due to the use of bucket auger drill rigs. The use of bucket auger borings will ensure the safety of the building structures. In order to limit disturbance to the wall footings, every 5th auger boring will initially be drilled adjacent to the building. These borings will be backfilled with cement slurry or clean soil prior to resuming augering.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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?

Impact Analysis:

Although the Project Site is underlain by silts and clays, these have a low expansion potential. Replacement of the soils with cement or clean soil will not increase the potential for expansive soils to impact the existing and any future structures. There is no indication that the soil underlying the proposed project is expansive and the potential for expansive soils that underly the Project Site is considered to pose a less than significant impact.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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?

Impact Analysis:

The project does not propose installation of a septic tank or an alternative waste water disposal system. No impact would occur.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

f. Directly or indirectly destroy a unique paleontological resources or site unique feature?

Impact Analysis:

The Project Site has been used continuously for commercial/industrial use since 1954. There is no unique geologic feature at the Project Site and the presence of a unique paleontological resource in the proposed project work area is unlikely.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

Black Rock Geosceinces, 2021, Interim Remedial Action Plan, Former Dicoen Electronics Facility, 2215 South Standard Avenue, Santa Ana, California , revised March 2021.

California Department of Conservation, Earthquake Zones of Required Investigation at https://maps.conservation.ca.gov/cgs/EQZApp/app/

City of Santa Ana General Plan, Land Use Element (https://www.santa-ana.org/general-plan/current-general-plan), dated January 2010; accessed online January 2021.

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

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

Assembly Bill 1493

AB 1493, signed in July 2002, requires CARB to develop and implement regulations to reduce automobile and light truck GHG emissions.

Executive Order S-3-05.

Executive Order S-3-05, signed in June 2005, proclaimed that California is vulnerable to the impacts of climate change.

Assembly Bill 32

In 2006, California passed the California Global Warming Solutions Act of 2006 (AB 32; California Health and Safety Code Division 25.5, Sections 38500, et seq.). AB 32 further details and puts into law the mid-term GHG reduction target established in Executive Order S-3-05: reduce GHG emissions to 1990 levels by 2020. AB 32 also identifies CARB as the state agency responsible for the design and implementation of emissions limits, regulations, and other measures to meet the target. AB 32 also established several programs to achieve GHG emission reductions, including the Low Carbon Fuel Standard and the Cap-and-Trade program. As of 2017, the state has reduced emissions below the revised AB 32 limit of 427 MMT CO2e.

Senate Bill 375

Senate Bill 375 (SB 375) enhances California's ability to reach its AB 32 targets by promoting good planning through its goal of developing more sustainable communities. SB 375 requires CARB to develop regional GHG emissions reduction targets for passenger vehicles.

Senate Bill 32

In 2016, the California State Legislature adopted Senate Bill (SB) 32 and its companion bill AB 197, and both were signed by Governor Brown (Office of Governor Edmund G. Brown Jr., 2016). SB 32 establishes a new climate pollution reduction target of 40 percent below 1990 levels by 2030.

Executive Order S-3-05

Executive Order S-3-05, issued by Governor Schwarzenegger, reinforces the targets established in AB 32 and SB 375 and also sets a schedule for reporting the measured impacts of climate change upon California's natural environment and the emissions reduction efforts undertaken by a myriad of state, regional, and local groups. Executive Order S-3-05 also establishes an additional GHG reduction target of 80% below 1990 levels by 2050.

California Environmental Quality Act and Senate Bill 97

The California Environmental Quality Act (CEQA) requires public agencies to evaluate the environmental impacts of discretionary development plans and projects in their jurisdictions. Senate Bill 97, passed in 2007, directed the Governor's Office of Planning and Research to develop and recommend new guidelines to analyze GHG impacts under CEQA. The CEQA guidelines were updated in March 2010 to require analysis of climate change in CEQA documents.

ARB Climate Change Scoping Plans

In December 2008, CARB adopted its Climate Change Scoping Plan. A Framework for Change (Scoping Plan), which contains the main strategies California will implement to achieve the required GHG reductions required by AB 32.4 The Scoping Plan also includes CARB recommended GHG reductions for each emissions sector of California's GHG inventory.

Climate Action Plan

In 2015, the City adopted a Climate Action Plan to develop and implement strategies aimed at reducing greenhouse gas (GHG) emissions from City operations and the community. GHG emissions have the potential to adversely affect the environment because they contribute, on a cumulative basis, to climate change. Climate change is increasing the weather-related risks, such as extreme heat waves, which can impact human health, infrastructure, and the reliability of the water supply.

ENVIRONMENTAL SETTING (BASELINE):

California is the second largest contributor of greenhouse gas (GHG) emissions in the United States. In California, the most common greenhouse gas is CO2 from fossil fuel combustion, which constitutes approximately 83 percent of all greenhouse gas emissions. The remainder of greenhouse gases only makes up a small percentage of the total: nitrous oxide constitutes 3.1 percent, methane 9 percent, and 4.7 percent of other gases with a high global warming potential.

The implementation of the IRAP will generate pollutants during the transit of personal and project support vehicles to and from the Project Site. In addition, the onsite equipment needed for excavating impacted soil, installing a groundwater monitoring well, and injecting VOC-reducing materials into the underlying aquifer will also generate GHGs. These GHGs include CO2, CH4, and NO.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

On December 5, 2008, the SCAQMD Governing Board adopted an interim GHG significance threshold for projects within the South Coast Air Basin. The threshold limit is 10,000 metric tons of CO2 equivalent per year).

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Excavation related GHG emissions were estimated using the methodology discussed earlier under Section 3, Air Quality.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

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

   Impact Analysis:

   Appendix A provides estimates of CO_2, CH_4, and NO_X emissions resulting from vehicle use during the implementation of the IRAP. The project does not include use or emissions of hydrofluorocarbons, perfluorocarbons, and/or sulfur hexafluoride. The estimated emission of CO_2 for this project is approximatelly 12

metric tons, which does not exceed the annual threshold limit of 10,000 metric tons of CO2 equivalent per year. Therefore, impacts would be less than significant.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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

Impact Analysis:

The proposed project is a short time project and would not conflic with the Clmate Change Plan adopted by the City. .

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

References Used:

California Air Resources Board website at http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook; accessed online July 2020.

City of Santa Ana Transit Zoning Code (SD 84A and SD 84B) Environmental Impact Report, Chapter 4.13 Global Climate Change at https://www.santa-ana.org/transit-zoning-code-environmental-impact-report; accessed online July 2020.

Greenhouse gas equivalent calculator at https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator; accessed online July 2020.

Greenhouse gasses percentages from https://ww2.arb.ca.gov/ghg-descriptions-sources; accessed online July 2020.

South Coast Air Quality Management District – Significant Thresholds at http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2; accessed online July 2020.

9. HAZARDS AND HAZARDOUS MATERIALS				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

Comprehensive Environmental Response, Comprehension, and Liability Act. Superfund Amendments and Reauthorization Act.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), known also as Superfund passed in 1980 in response to some alarming and decidedly unacceptable hazardous waste practices and management going on in the 1970s.

Title 49 of the Code of Federal Regulations

The U.S. Department of Transportation (DOT) regulates the transport of hazardous materials under Title 49 of the Code of Federal Regulations (CFR, Title 49) which prohibits the release of hazardous materials to the environment and requires all containers to meet strict standards for impact resistance, strength, and packing compatibility. In addition, Title 49 contains specific requirements for the training of drivers in inspection, operation of vehicles, loading and unloading of materials, the properties and hazards of the materials transported, and the use of vehicle controls and equipment, including operation of emergency equipment.

Title 22

Titles 22 of the California Code of Regulations (CCR) address hazardous materials and wastes. Title 22 defines, categorizes, and lists hazardous wastes, specifies hazardous waste management standards and transportation requirements.

ENVIRONMENTAL SETTING (BASELINE):

PCE and TCE were releases as part of the former operations at the Project Site. These contaminants were spilled in the Project Site's central portion. The PCE- and TCE-impacted soils cover an estimated 51,780 square feet of area. These contaminants have impacted soil, soil vapor and groundwater to depths up to 50 feet. The purpose of the planned onsite remedial activities is to significantly reduce the mass of these contaminants within and down-gradient of the Project Site shown in Figure 3.

The implementation of the IRAP will generate soil and wastewater during soil excavation, equipment decontamination processes, and groundwater monitoring activities. These wastes will be profiled and sent to offsite disposal facilities in accordance with all applicable laws and requirements.

The excavated soil will be temporarily stockpiled in the parking lot in the Project Site’s northern portion. The stockpiled soil will be placed on and covered with plastic sheeting to protect against rain, wind, and potential odors. Temporary fencing will be placed around the stockpiles when not being accessed. The stockpiled soil will not be allowed to remain within the Project Site for more than 7 days.

The materials injected into soil and groundwater will be zero valent iron which will be stored, mixed, and injected by trained personnel.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The project is determined to be significant it would expose people or the environment to hazardous materials or wastes in excess of Federal, State, or local regulatory standards.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

No environmental studies were performed previously. Readily available information was reviewed for the assessment.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

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

   Impact Analysis:

   The proposed project would not create significant hazard to the public or the environmenta as all remediation waste (including excavated soil) considered potentially hazardous will be properly managed in accordance with applicable laws and regulations. Hazardous waste will be transported offsite for disposal by a properly licensed hazardous waste transportation contractor with appropriate hazardous waste manifest, in accordance with California Department of Transportation (DOT) guidelines.

   Conclusion:

   ☐ Potentially Significant Impact

   ☐ Less Than Significant With Mitigation Incorporated

   ☒ Less Than Significant Impact

   ☐ No Impact

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?

Impact Analysis:

The proposed project would result in a small potential for short-term exposure of Project Site workers to COPCs during the implementation of the proposed project. However, exposure to contaminated soil at the Project Site is not expected as long as excavated areas would be paved and institutional controls are to be in place to maintain surface cover to prevent direct soil exposure to on-site industrial and commercial/office workers. A site-specific Health and Safety Plan (HASP) which describes health and safety procedures, including emergency response, was prepared to minimize incidents, injury, and health risks associated with the interim remedial measures proposed at the Project Site. The potential for short-term exposure to on-site workers would be reduced. Overall, the proposed project is protective of human health and the environment by reducing the concentration of VOCs in vadose zone soils and groundwater that migrate beyond the Project Site boundary. Therefore, impacts would be less than significant.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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

Impact Analysis:

There are no schools within one-quarter mile of the Project Site. The closest school, James Monroe Elementary School, is located approxiamtely 1,900 feet (0.36 mile) southwest of the Project Site. No impact would occur.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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?

Impact Analysis:

The site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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?

Impact Analysis:

The Project Site is not located within two miles of an airport. The closest airport (John Wayne Airport, SNA) is located approximately 2.25 miles southeast of the Project Site.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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

Impact Analysis:

The proposed project would not impair implementation of, or interfere with, the City of Santa Ana or Orange County's emergency response or evacuation plans. A site-specific emergency response plan is included as part of the HASP that would be implemented in the event of an emergency. During the implementation of the proposed project, emergency response vehicles (i.e., police and fire services) would have continued access, as necessary, to the Project Site and surrounding areas without interruption. Therefore, no impact would occur.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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

Impact Analysis:

There are no wildlands located within two miles of the Project Site. The foothills to the Santa Ana mountains are located approximately six miles northeast of the Project Site.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

Airport locations from https://www.travelmath.com/nearest-airport/Orange+County,+CA; accessed online July 2020.

Black Rock Geosceinces, 2021, Interim Remedial Action Plan, Former Dicoen Electronics Facility, 2215 South Standard Avenue, Santa Ana, California, revised March 2021.

California Department of Conservation – Division of Oil, Gas, and Geothermal Resources, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos; dated August 2000.

City of Santa Ana General Plan, Airport Environs Element (https://www.santa-ana.org/general-plan/current-general-plan), dated January 2010; accessed online July 2020.

Google Earth; accessed online July 2020.

10. HYDROLOGY AND WATER QUALITY				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☐	☒
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
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; or	☐	☐	☐	☒
(iv) impede or redirect flood flows?	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

Clean Water Act of 1977 (Including 1987 Amendments)

The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulates quality standards for surface waters. Under the CWA, the United States Environmental Protection Agency (EPA) has implemented many pollution control standards for industries, as well as water quality standards for all contaminants in surface waters. The CWA made it unlawful to discharge any pollutants from a point source into navigable waters, unless a National Pollutant Discharge Elimination System (NPDES) permit is obtained.

Porter-Cologne Water Quality Control Act

Porter-Cologne authorizes the RWQCB to regulate discharges of waste and fill material to waters of the state, including "isolated" waters and wetlands, through the issuance of waste discharge requirements (WDRs). Under Porter-Cologne all parties proposing to discharge waste that could affect the quality of waters of the state, other than into a community sewer system, shall file with the appropriate RWQCB a Report of Waste Discharge (ROWD) containing such information and data as may be required by the RWQCB.

National Flood Insurance Act

The National Flood Insurance Act of 1968 established the National Flood Insurance Program. The National Flood Insurance Program is a federal program administered by the Flood Insurance Administration of FEMA. It enables individuals who have property (a building or its contents) within the 100-year floodplain to purchase insurance against flood losses. Community participation and eligibility, flood hazard identification, mapping, and floodplain management aspects are administered by state and local programs and support programs within FEMA itself. FEMA works with the states and local communities to identify flood hazard areas and publishes a flood hazard boundary map of those areas.

California Water Code

The use of water in the state is governed by the California Water Code or Title 23 of the California Code of Regulations. Title 23 requires that water resources must be put to beneficial use to the fullest extent of which they are capable, and that the waste, unreasonable use, or unreasonable method of use of water is illegal. The conservation of water is encouraged as a reasonable and beneficial in the interest of the people and for the public welfare.

ENVIRONMENTAL SETTING (BASELINE):

Surface Water:

There are no surface waters in the immediate site vicinity. The closest river is the Santa Ana River, which is located approximately 3.5 miles to the west. The closest named body of water, the Barranca Channel, is located approximately 2.5 miles southeast of the Project Site. The Santa Ana River and Barranca Channel are generally dry throughout the year.

Groundwater:

The groundwater zones located immediately beneath the Project Site are referred to as the upper-perched aquifer (upper 110 feet bgs), Lakewood Formation aquifers (upper 400 feet bgs), and the San Pedro Formation aquifers (400 to 1,400 feet bgs). Within and adjacent to the Project Site, only the upper-perched aquifer has been investigated.

Three groundwater-bearing zones have been identified beneath the Project Site between the surface and a depth of 60 feet. These zones are referred to as the A Zone, B Zone, and C Zone. This nomenclature is unique to the Project Site and is not consistent with the nomenclature used by others for the adjoining areas. The A-Zone groundwater is encountered in relatively thin lenses of sandy silt and sandy clay between 3 and 10 feet bgs, and between approximately 20 and 21 feet bgs. These water-bearing lenses are confined by unsaturated clays and silts and are therefore under pressure. They are laterally discontinuous within and immediately adjacent to the Project Site. In April 2020, the depths to groundwater within the onsite A-Zone wells ranged between 2.75 and 15.41 feet. The A-Zone's groundwater gradient in April 2020 was variable.

The B-Zone groundwater is encountered between approximately 31 and 45 feet bgs. The soils within this aquifer are generally comprised of silty fine sand. Silt and clay layers confine the upper and lower portions of this aquifer. The B-Zone aquifer is laterally continuous within and adjacent to the Project Site. In April 2020, the depth to groundwater within the onsite B-Zone wells ranged between 16.85 and 18.55 feet. Gradient of the B-Zone groundwater flow is to the southwest.

The C-Zone aquifer is encountered between approximately 48 and almost 70 feet bgs. It is generally comprised of fine- to medium-grained sands, and the aquifer is confined beneath a silt and clay layer. In April 2020, the depth to groundwater within the onsite C-Zone wells was between 17.77 and 18.01 feet. The C-Zone's groundwater gradient is toward the southwest.

Each of the shallow groundwater zones beneath the Project Site contains contaminant concentrations that exceed regulatory levels. The impacted groundwater has migrated from the Project Site to at least one-quarter mile to the southwest.

Several offsite businesses are also contributors to VOC contamination in the Project Site area. Elevated concentrations of VOCs in groundwater are migrating into the Project Site from up-gradient properties.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The project is determined to be significant if it would:

- Violate any water quality standards or waste discharge standards set by the RWQCB or otherwise substantially degrade surface or groundwater quality;
- Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the local groundwater table would be lowered;
- Substantially reduce the amount or quality of water otherwise available for public water supplies;
- Substantially alter an existing drainage such that substantial erosion, siltation, or flooding would occur in the City or property in adjacent municipalities;
- Create or substantially contribute to runoff water which would exceed the capacity of existing or planned stormwater drainage systems or create an increase in calculated peak flood discharges;
- Substantially alter a natural water course;
- Place housing or other structures within a 100-year flood hazard zone, as defined by FEMA; or
- Expose people or property to a significant risk of loss, injury, or death from flooding, including flooding by seiche inundation, dam or reservoir failure, tsunami, or mud flows.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Groundwater sample results were compared to MCLs to determine whether remediations are needed.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

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

Impact Analysis:

The excavation and in-situ injection activities will be conducted in a manner that does not violate water quality standards. A waste discharge requirement application for injection materials will be submitted to the Santa Ana Regional Water Quality Control Board for review and approval. The injection activities will be conducted in accordance with these requirements. The project would not violate any water quality or discharge requirements.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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

Impact Analysis:

The project will not pump any significant groundwater quantities other than small amounts for sampling purposes during the groundwater monitoring activities. The proposed remedies within the IRAP do not involve groundwater extraction. Groundwater supplies will not be depleted. There would be no impact to groundwater

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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;

Impact Analysis:

The planned excavation area, planned injection area, and any new monitoring wells will not be located within or near any rivers or streams. They will be located on relatively flat concrete surfaces. Any disturbances of these surfaces will be brought back to existing conditions. They will not interfere with any existing drainage pattern, including contributing to their erosion or siltation on or off-site.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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

Impact Analysis:

The proposed project is not expected to increase the rate or amount of surface run-off. In the event of rain, the contractor would prevent surface runoff from entering or leaving the work area. The placement of berms around the excavation area (e.g. sand bags) will reduce potential run-off from the excavation area and run-on into the excavation. These controls will be inspected and evaluated on a daily basis (if rain is anticipated) until the excavation has been backfilled in order to ensure that they function effectively. The water within the excavation areas, if any, will be pumped and stored in appropriate containers. Water entering the Project Site from non-impacted areas will be properly diverted toward an offsite storm drain.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

(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; or

Impact Analysis:

As explained above the proposed project is not expected to create or contribute to runoff water in excess of the capacity of the existing stormwater drainage system serving the Project Site and surrounding areas. All water within the excavated area would be contained, pumped and stored in container.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

(iv) impede or redirect flood flows?

Impact Analysis:

The surface run-off will be temporary altered during the excavation as explained above. The run-off flows remain the same after the excavated areas are filled and paved with concrete.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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

Impact Analysis:

The Project Site is not located near any lakes, reservoirs, or other large bodies of water. Therefore, it is not subject to seiche hazards. The Project Site is located over eight miles from the ocean. Therefore, tsunami hazards are unlikely. No impact would occur.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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

Impact Analysis:

The proposed project will not degrade water. One of the remedial objectives of the cleanup strategy is to eliminate the onsite source of contamination in order to help preserve and enhance water quality and protect beneficial uses of groundwater. The removal of the contaminated soil and the injection of the VOC-reducing compounds will be in compliance with the general water discharge requirements that were established by the Santa Ana Regional Water Quality Control Board. There would be no impact.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

Black Rock Geosciences, 2020, Second Quarter 2020 Groundwater Monitoring Report - Former Diceon Electronics Facility, 2215 South Standard Avenue, Santa Ana, California; dated July 15, 2020.
Black Rock Geosceinces, 2021, Interim Remedial Action Plan, Former Dicoen Electronics Facility, 2215 South Standard Avenue, Santa Ana, California, revised March 2021

City of Santa Ana General Plan, Land Use Element & Public Safety Element (https://www.santa-ana.org/general-plan/current-general-plan), dated January 2010; accessed online July 2020.

Google Earth; accessed online July 2020.

11. LAND USE AND PLANNING				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Physically divide an established community?	☐	☐	☐	☒
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?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

No regulatory laws, ordinances, regulation, standards area applicable to this resource.

ENVIRONMENTAL SETTING (BASELINE):

The Project Site is located in an urban area of the City of Santa Ana, within the coastal plain of Orange County. The Project Site is zoned for industrial use. The Project Site and properties to the north, east, and south are established light industrial properties. The planned project area is confined to the central portion of the Project Site, and possibly the adjoining industrial property. Well-established single-family dwellings are located west of the Project Site, across Standard Avenue. The work area is located at a minimum approximately 330 feet east of these dwellings.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The proposed project is determined to be significant if it would:

- Create adverse changes in the functional role and/or predominant pattern of uses within a geographical area;
- Result in an intensification of development density that negatively changes an area's character;
- Result in a substantial loss of open space; or
- Physically divide an established community.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

No previous environmental studies were performed. Project Site land use was evaluated according to the City's general plan.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Physically divide an established community?

Impact Analysis:

The proposed project is limited to the soil excavation and injection of chemicals to groundwater and would not divide the Project Site or the adjoining properties.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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?

Impact Analysis:

The proposed project is limited to the soil excavation and injection of chemicals to groundwater and would not conflict with the land use plan or regulations.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

City of Santa Ana General Plan, Land Use Element & Public Safety Element (https://www.santa-ana.org/general-plan/current-general-plan), dated January 2010; accessed online July 2020.

12. MINERAL RESOURCES				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

Surface Mining and Reclamation Act of 1975

The State Mining and Reclamation Act of 1975 (SMARA) requires that the State Mining and Geology Board (SMGB) map areas throughout the State of California that contain regionally significant mineral resources. Aggregate mineral resources within the state are classified by the SMGB through application of the Mineral Resource Zone (MRZ) system. The MRZ system is used to map all mineral commodities within identified jurisdictional boundaries. The MRZ system classifies lands that contain mineral deposits and identifies the presence or absence of substantial sand and gravel deposits and crushed rock source areas (i.e., commodities used as, or in the production of, construction materials).

City of Santa Ana General Plan

Mineral resources are generally protected and regulated by the City and/or County General Plans through land use and zoning requirements.

ENVIRONMENTAL SETTING (BASELINE):

The Project Site is located in the City of Santa Ana, which has an area of 27.3 square miles. Of this total, 58 percent is devoted to residential development, 15 percent to commercial uses, 14 percent to industrial, 11 percent to public and institutional uses, and 2 percent to public parkland and open space. There are no mineral resources within the City, including mineral aggregates and natural gas. No further analysis of mineral resources is deemed necessary

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The project is determined to be significant the project results in the loss of availability of a known or locally important mineral resource.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the lack of mineral resources in or near the Project Site, no environmental studies relating to mineral resources were prepared for the proposed project.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

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?

   Impact Analysis:

   See Environmental Setting (Baseline).

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

b. 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?

Impact Analysis:

See Environmental Setting (Baseline).

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

City of Santa Ana General Plan, Land Use Element (https://www.santa-ana.org/general-plan/current-general-plan), dated January 2010; accessed online October 2020.

13. NOISE				
Would the project result in:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
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?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
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?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

City's Ordinance

The Santa Ana Noise Ordinance establishes standards for maximum noise levels within residential areas of the City. The exterior noise level standard is 55 decibels (dBA) from 7 AM to 10 PM, and 50 dBA from 10 PM to 7 AM. The City exempts construction noise from this requirement between 7:00 a.m. and 8:00 p.m. on Mondays through Saturdays.

ENVIRONMENTAL SETTING (BASELINE):

The Project Site is located in an area of mixed industrial, commercial, and residential land use. The nearest school is located approximately 1,900 feet southwest of the Project Site. The exterior noise standard for residential and institutionally sensitive noise receptors is 65 db, as stated in the Noise Element of the Santa Ana General Plan. The City exempts construction noise from this requirement between 7:00 a.m. and 8:00 p.m. on Mondays through Saturdays. All activities related to excavation will be conducted from Monday to Friday, from 7:00 a.m. to 4 p.m.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

There is no applicable threshold of significance as the City exempt construction noise from the noise requirement from Mondays to Saturdays, 7 a.m. to 8 p.m.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

There is no environmental studies or methodology used as the City exempt construction noise from the noise standards.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would 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?

   Impact Analysis:

According to the Construction Noise Handbook issued by the Federal Highway Administration, the following noise levels are anticipated during mitigation work. These noise levels are at a distance of 50 feet.

Concrete saw = 90 dBA
Backhoe = 80 dBA
Front-end loader = 80 dBA
Dump truck = 84 dBA
Soil compactor = 80 dBA
Concrete truck = 85 dBA
Drill rig = 85 dBA

Residences are located approximately 330 feet west of the planned work area. Onsite Building A is located between the work area and these residences. If Building A were not there, the highest sound level at the residential area would be approximately 73.6 dBA during the initial removal of concrete (from the concrete saw). Afterward, the highest sound level at the adjoining residential properties would be approximately 68.6 dBA. The sound levels at the residential areas are expected to be lower than this estimate due to the presence of Building A, which is anticipated to screen some of the noise levels.

In addition, the IRAP proposes following measures during excavation activities:

- The equipment used onsite will be maintained or modified in a fashion that prevents excess noise.
- The excavation equipment will receive regularly scheduled maintenance in order to minimize noise levels.
- If the equipment used cannot be maintained or modified sufficiently to reduce excess noise, it will be replaced.
- Equipment that generates noise close to 85 decibels will be operated at slower speeds in order to reduce noise levels.
- Sound boards will be placed between the operating equipment and adjoining community in the event that noise levels cannot be maintained below 85 decibels.

In addition all excavation and groundwater injection related activities will be conducted from Monday to Friday, between 7:00 a.m. and 4:00 p.m. in compliance with the the City's construction noise ordinance

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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

Impact Analysis:

The proposed project activities may produce groundborne vibrations during the concrete cutting and removal, drilling, and possibly during the backfilling of the excavations. Vibrations associated with the backfill are expected to be limited, since most of the excavation will be backfilled with cement slurry. These vibrations will be temporary and of relatively short duration, and are thus not anticipated to create an excessive disturbance to the adjoining residential neighborhood. Therefore, the proposed activities are expected to pose a less than significant impact from vibrations and groundborne noise levels

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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?

Impact Analysis:

The project is not taking place within an airport or within 2 miles of an airport. The closest airport (John Wayne Airport - SNA) is located approximately 2.25 miles southeast of the Project Site.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

Black Rock Geosceinces, 2021, Interim Remedial Action Plan, Former Dicoen Electronics Facility, 2215 South Standard Avenue, Santa Ana, California, revised March 2021.

City of Santa Ana General Plan, Land Use Element and Noise Element (https://www.santa-ana.org/general-plan/current-general-plan), dated January 2010; accessed online July 2020.

Noise calculations from http://hyperphysics.phy-astr.gsu.edu/hbase/Acoustic/isprob2.html; accessed online July 2020.

Noise Level Handbook from https://www.fhwa.dot.gov/Environment/noise/construction_noise/handbook/handbook00.cfm; accessed online July 2020.

Noise levels from https://www.fhwa.dot.gov/Environment/noise/construction_noise/handbook/handbook09.cfm; accessed online July 2020.

14. POPULATION AND HOUSING				
Would the Project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
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)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

No regulatory laws, ordinances, regulation, standards area applicable to this resource.

ENVIRONMENTAL SETTING (BASELINE):

The Project Site is located in an area zoned for industrial use and it is bordered by industrial properties to the north, east, and west. A roadway is located along the Project Site's western side. Dwellings are located west of the Project Site and this roadway, at a minimum approximately 330 feet from the planned cleanup area.

The planned remedial actions are intended to substantially decrease the contaminant concentrations in soil, soil vapor and groundwater. There will be no opportunity for job increases from the project implementation. The workers are expected to be drawn from the existing area work-force and would not require the relocation of workers. Therefore, increases in population growth and/or housing demand are not anticipated. No further analysis is deemed necessary

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

For the purposes of this analysis, the proposed project would result in an adverse effect on population and housing.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

No environmental studies relating to population and housing resources were prepared for the proposed project. Readily available information was reviewed for this assessment.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

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

   Impact Analysis:

   See Environmental Setting (Baseline).

   Conclusion:

   ☐ Potentially Significant Impact

   ☐ Less Than Significant With Mitigation Incorporated

   ☐ Less Than Significant Impact

☒ No Impact

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

Impact Analysis:

See Environmental Setting (Baseline).

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

Black Rock Geosceinces, 2021, Interim Remedial Action Plan, Former Dicoen Electronics Facility, 2215 South Standard Avenue, Santa Ana, California, revised March 2021.

15. PUBLIC SERVICES				
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:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
i. Fire protection?	☐	☐	☐	☒
ii. Police protection?	☐	☐	☐	☒
iii. Schools?	☐	☐	☐	☒
iv. Parks?	☐	☐	☐	☒
v. Other public facilities?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

No regulatory laws, ordinances, regulation, standards area applicable to this resource.

ENVIRONMENTAL SETTING (BASELINE):

The Project Site is located in an area developed for industrial operations. Access to public services such as fire and police services is readily available and provided by the Orange County Fire Authority (OCFA) and Santa Ana City Police Department, respectively. The nearest fire station is OCFA Station No. 79, which is located approximately 600 feet southeast of the Project Site at 1320 E. Warner Avenue (1,500 feet driving distance). The nearest police station is located at 60 Civic Center Plaza in Santa Ana, which is a driving distance of approximately 4.0 miles. The nearest school is the James Monroe Elementary School, which is located approximately 1,900 feet southwest of the Project Site. A community park, Delhi Park, is located approximately 990 feet southwest of the Project Site.

The proposed project will be implemented within the Project Site boundary and possibly the adjoining industrial property. It will not result in any physical impacts to public services. Access to the Project Site is through the entrance off Standard Avenue, which will remain unobstructed so as to not impede emergency access. Poposed Project implementation will not require any new or altered public utilities or infrastructure services from the existing supply power, water, or sewer lines. The proposed project would have no impact on other public facilities. Therefore, no further analysis is deemed necessary.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The project is determined to be significant if it would result in a substantial modification to existing public services.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

No environmental studies relating to public services resources were prepared for the proposed project. Readily available information was reviewed for this assessment.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

Result in substantial adverse physical impacts associated with the provision of new or physically altered government 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 following public services:

i. Fire protection?

Impact Analysis:

See Environmental Setting (Baseline).

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

ii. Police protection?

Impact Analysis:

See Environmental Setting (Baseline).

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

iii. Schools?

Impact Analysis:

See Environmental Setting (Baseline).

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

iv. Parks?

Impact Analysis:

See Environmental Setting (Baseline).

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

v. Other public facilities?

Impact Analysis:

See Environmental Setting (Baseline).

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

City of Santa Ana General Plan, Open Space, Parks and Recreation Element (https://www.santa-ana.org/general-plan/current-general-plan), dated January 2010; accessed online July 2020.

City of Santa Ana Police Department at https://www.santa-ana.org/pd; accessed online August 2020

Google Earth; accessed online August 2020.

Orange Couty Fire Authority at http://www.ci.santa-ana.ca.us/ocfa/; accessed online August 2020.

16. RECREATION				
	Potentially Significant Impact	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

Quimby Act (AB 1191)

The Quimby Act (California Government Code Section 66477) was first established by the California Legislature in 1965. It set forth provisions in the State Subdivision Map Act for the dedication of parkland and/or payment of in-lieu fees as a condition of approval of certain types of residential development projects. The Quimby Act allows local agencies, such as the City of Los Angeles, to establish ordinances that require residential subdivision developers to pay impact fees, which can be used to purchase and develop land and/or recreational facilities.

ENVIRONMENTAL SETTING (BASELINE):

The Project Site is zoned for industrial use. The nearest public park is Delhi Park, which is located approximately 990 feet southwest of the Project Site. Project activities will be implemented within the Project Site's boundary and will not include construction or modification of recreational facilities. Project activities do not require public parks or recreation areas to be constructed or expanded. The proposed project will not provide recreational uses or substantially deteriorate current conditions of the existing recreational facilities or parks. Therefore, no further analysis is deemed necessary.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The project is determined to be significant if it would result in a substantial modification to existing parks and recreational facilities.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the lack of impacts to recreational resources in or near the Project Site, no environmental studies relating to recreational resources were prepared for the proposed project.

IMPACT ANALYSES AND CONCLUSIONS:

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?

Impact Analysis:
See Environmental Setting (Baseline).

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

b. Does the project include recreational facilities or require construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Impact Analysis:

See Environmental Setting (Baseline).

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

Black Rock Geosceinces, 2021, Interim Remedial Action Plan, Former Dicoen Electronics Facility, 2215 South Standard Avenue, Santa Ana, California, revised March 2021.

City of Santa Ana General Plan, Open Space, Parks and Recreation Element (https://www.santa-ana.org/general-plan/current-general-plan), dated January 2010; accessed online July 2020.

Google Earth; accessed online July 2020.

17. TRANSPORTATION				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☐	☒
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d) Result in inadequate emergency access?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

Title 49, Code of Federal Regulations, Parts 171–177

Title 49, Parts 171-177 governs the transportation of hazardous materials, the types of materials defined as hazardous, and the marking of the transportation vehicles. The administering agencies for the above regulation are the California Highway Patrol (CHP) and the United States Department of Transportation (USDOT).

Title 40, Code of Regulations, Parts 260 - 279

Transporters of hazardous waste are governed by 40 CFR part 263 and EPA has the authority to control hazardous waste from the generation, transportation, treatment, storage, and disposal of hazardous waste.

Hazardous Waste Control Law (Health and Safety Code (HSC) Chapter 6.5) and 22 California Code of Regulations (CCR).

The law establishes regulations and incentives which ensure that the generators of hazardous waste employ technology and management practices for the safe handling, treatment, recycling, and destruction of their hazardous wastes prior to disposal. Article 6 of HSC Chapter 6.5 discusses the transportation of hazardous waste. California Vehicle Code: Divisions 2, 6, 12, 13, 14, 15 also apply to transportation of hazardous materials.

ENVIRONMENTAL SETTING (BASELINE):

The City of Santa Ana is served by four freeways: the Santa Ana (1-5), the Garden Grove (SR-22), the Costa Mesa (SR- 55), and the Orange (SR-57) freeways. These freeways are located near the northern, eastern and southern boundaries of the City and carry commuters into the City, as well as to the surrounding region. Local roadways in the City generally form a grid pattern in north-south and east-west directions.

The Project Site is accessible by Standard Avenue, Warner Avenue, Edinger Avenue, and Grand Avenue, which are designated as major arterial roadways. These four roadways are also designated as truck routes in the City of Santa Ana.

At the height of onsite remedial work, up to 11 vehicles (6 personal and 5 commercial trucks) can be expected to use the adjoining roadways. These extra vehicles are not anticipated to significantly impact the traffic on City streets. The daily traffic counts on roadways to be used by Project Site workers are as follows (pre-COVID-19 Levels):

Standard Avenue - 10,000 to 20,000

Edinger Avenue - 30,000 to 40,000
Warner Avenue - 20,000 to 30,000
Grand Avenue - 20,000 to 30,000.

The excavated soil will be transported for offsite disposal at State-licensed soil disposal facilities which may include the the following.

Soil Safe, Inc.
12328 Hibiscus Road
Adelanto, CA 92301

And

Buttonwillow Landfill
2500 West Lokern Road
Buttonwillow, CA 93206

Trucks utilized to transport contaminated soil will enter and exit the Project Site via Standard Avenue. The haul route to and from the soil disposal facility will be by one of the following routes out of Santa Ana:

- Standard Avenue (south) to Warner Avenue (east) to Grand Avenue (south) to Dyer Road (west) to the 55 Freeway (south);
- Standard Avenue (south) to Warner Avenue (east) to Grand Avenue (south) to Dyer Road (east) to the 55 Freeway (north); or
- Standard Avenue (north) to Edinger Avenue (east) to Newport Avenue (south) to the 55 Freeway (north)

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of transportation resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance. LOS has been the standard by which transportation impacts of major developments and changes to roads were measured.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

No environmental studies relating to transportation resources were prepared for the proposed project. The number of vehicles used for the proposed project Implementation was assessed based on the daily traffic count.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

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

Impact Analysis:

Project activities will temporarily increase traffic counts by up to 40 vehicles per day. Most of this travel will be staggered and conducted prior to or between usual rush hours. Due to the relatively short duration of the project, the temporary increase in traffic is not anticipated to conflict with applicable traffic plans, ordinances, or policies that measure the effectiveness of the City's circulation system. The impact would be less than significant

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Impact Analysis:

Section 15064.3, subdivision (b) of the CEQA Guidelines describes criteria for analyzing transportation impacts. The proposed project would result in short-term presence of workers and vehicles at the Project Site. The proposed project activities are limited in nature and would occur within a short-term duration, the proposed project would not generate recurring and significant number of trips and associated with “vehicle miles traveled”, therefore no impact would occur, and no mitigation would be required.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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

Impact Analysis:

The roadways to be traveled to and from the Project Site (from the SR55 freeway) are designated for trucks. There will be no change in roadway designs. No impact would occur.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

d. Result in inadequate emergency access?

Impact Analysis:

The project will not alter the current emergency access routes. Therefore, no impacts would occur as a result of the proposed project

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

Black Rock Geosceinces, 2021, Interim Remedial Action Plan, Former Dicoen Electronics Facility, 2215 South Standard Avenue, Santa Ana, California, revised March 2021.

City of Santa Ana General Plan, Circulation Element (https://www.santa-ana.org/general-plan/current-general-plan); accessed online July 2020.

Google Earth; accessed online August 3, 2020.

Traffic volumes from https://www.octa.net/pdf/2019-ADT.pdf; accessed online August 2020.

18. TRIBAL CULTURAL RESOURCES				
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 21083.3.2.) 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.				
Would the project 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:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) 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), or	☐	☐	☐	☒
b) 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.	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

Assembly Bill 52

On September 25, 2014, Governor Jerry Brown signed into law Assembly Bill (AB) 52. California Assembly Bill 52 (AB52) specifies that any project for which a Notice of Preparation, Notice of Mitigated Negative Declaration or Notice of Negative Declaration is filed on or after July 1, 2015, the Lead agency must provide formal notification within 14 days of determining that an application for a project is complete or of a decision to undertake a project to the designated contact or tribal representative of the affiliated California Native American tribes. The tribe that is traditionally and culturally affiliated to the geographic area where a project is located must have requested that the lead agency in question provide notification to the tribe**.**

Public Resource Code Section 21047

The Public resource Code Section 21047 provides the definition of tribal cultural resources.

ENVIRONMENTAL SETTING (BASELINE):

A Sacred Lands File search report was obtained from the Native American Heritage Commission (NAHC) for the Project Site on November 4, 2020 by DTSC. The NAHC search did not find native American cultural resources present in the project area. The Project Site has been used for industrial purposes since 1954 and a building was contructed at the Project Site in 1999 and no tribal cultural resources were found during this construction. However, if archaeological ortribal resources are discovered during excavation, then excavating will stop until a qualified archaeologist or appropriately licensed professional can assess the significance of the find and, if necessary, develop appropriate response measures in consultation with the DTSC, other agencies and Native American

representatives. If human remains are encountered, excavating will stop and the County Coroner will be immediately notified. Work will not continue until the County Coroner has made a determination of origin and disposition. If the remains are determined to be Native American, the Coroner will notify the Native American Heritage Commission and the County Coordinator of Indian Affairs. As such, there will be no impact to tribal cultural resource.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The project is determined to be significant there is a permanent adverse change of a tribal cultural resource.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

A Sacred Lands File search report was used which concluded the absence of tribal cultural resources.

IMPACT ANALYSES AND CONCLUSIONS:

a. Would the project 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), or

Impact Analysis:

No tribal cultural resources, as defined in PRC Section 21074 were acknowledged by the Native American Heritage Commission, on the Project Site or in its immediate vicinity. No responses were received to our Tribal inquiries both in writing and via phone. As described in the Baseline Environmental Conditions, the Project Site has been used continuously for industrial use since 1954 and was previously disturbed for a building construction in 1999. Based on the Project Site location, history, and absence of cultural resource findings, it is not likely that historical resources would be identified or impacted during corrective measures. However, if archaeological ort tribal resources are discovered during excavation, procedures described in the Environmental Setting will be followed.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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 Resource 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.

Impact Analysis:

There are no known tribal cultural resources, as defined in PRC Section 21074, on the Project Site or in its immediate vicinity. the Project Site has been used continuously for industrial use since 1954 and was previously disturbed for a building construction in 1999.

On November 25, 2020, DTSC formally notified the 11 Tribes identified in the NAHC listing. By February 3, 2021, no Tribe responded to the AB52 Consultation letter.

As previously stated, the Project Site has been previously disturbed, and no information regarding the presence of known tribal cultural resources has been provided to the DTSC from the contacted Tribes or from cultural resource surveys or records. The proposed project also includes a standard operating procedure whereby all possible damages caused in the event of an unanticipated discovery can be avoided. Specifically, if Tribal cultural resources are discovered during the IRAP implementation, procedures described in the Environmental Setting would be followed.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

19. UTILITIES AND SERVICE SYSTEMS				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
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?	☐	☐	☐	☒
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

Clean Water Act

The federal Clean Water Act (CWA) establishes regulatory requirements for potable water supplies including raw and treated water quality criteria.

Safe Drinking Water Act

California enacted its own Safe Drinking Water Act (SDWA). Department of Health Services (DHS) has been granted primary enforcement responsibility for the SDWA. Title 22 of the California Administrative Code establishes California DHS authority and stipulates drinking water quality and monitoring standards. These standards are equal to or more stringent than the Federal standards.

Title 22

The California Water Code requires the Department of Health Services (DHS) to establish water reclamation criteria. In 1975, the DHS prepared Title 22 to fulfill this requirement. Title 22 regulates production and use of reclaimed water in California by establishing three categories of reclaimed water: primary effluent, which typically includes grit removal and initial sedimentation or settling tanks; adequately disinfected, oxidized effluent (secondary effluent) which typically involves aeration and additional settling basins; and adequately disinfected, oxidized, coagulated, clarified, filtered effluent (tertiary effluent) which typically involves filtration and chlorination. In addition to defining reclaimed water uses, Title 22 also defines requirements for sampling and analysis of effluent and requires specific design requirements for facilities.

Urban Water management Planning Act

The Urban Water Management Planning Act (California Water Code Division 6, Part 2.6 Sections 10610- 10656) was developed due to concerns over potential water supply shortages throughout California. It requires information on water supply reliability and water use efficiency measures. Urban water suppliers are required, as part of the Act, to develop and implement Urban Water Management Plans (UWMPs) to describe water supply, service area demand, population trends and efforts to promote efficient use and management of water resources. An UWMP is intended to serve as a water supply and demand planning document that is updated to reflect changes in the water supplier's service area including water supply trends, and conservation and water use efficiency policies.

ENVIRONMENTAL SETTING (BASELINE):

The City of Santa Ana obtains its potable water from groundwater (about 70 percent) and imported sources (about 30 percent). The groundwater accumulates and is stored beneath the surface of the earth and then pumped to the surface by 20 wells owned by the City.

The imported water is purchased from the Metropolitan Water District of Southern California (MWD). MWD brings Colorado River water from Lake Havasu and runoff from the snow pack in the Sierra Nevada Range in Northern California. The water is then treated at either the Diemer Filtration Plant in Yorba Linda or the Weymouth Filtration Plant in La Verne before it is delivered to Santa Ana.

The City of Santa Ana Municipal Utility Services, Southern California Edison, and Southern California Gas Company currently provide water, electricity, and gas services, respectively, to the Project Site. These three companies will continue to service the Project Site during implementation of the IRAP.

Potable municipal water will be mixed with the VOC-reducing compounds prior to their injection into the groundwater. Additional water use during the IRAP implementation may include spraying the freshly excavated/exposed soil in order to reduce dust and potential VOC emissions.

A relatively moderate volume of soil cuttings and relatively small volume of rinse water will be generated during implementation of the project. These wastes will be profiled and sent to appropriate facilities for treatment and disposal.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The project is determined to be significant if it would result in extensive disruptions to public utility services the construction of new utilities due to increased demand.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

No environmental studies relating to utilities and service systems resources were prepared for the proposed project. Readily available information was reviewed for this assessment.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities the construction or relocation of which could cause significant environmental effects?

   Impact Analysis:

   The wastewater generated from the project implementation will be collected in drums, analyzed, and then sent to an off-site facility for treatment. No discharge of the wastewater will occur as a result of the project implementation. Construction of new wastewater treatment and/or stormwater drainage, electric power, natural gas, or telecommunications facilities is not required as the result of this project and will not cause significant environmental effects.

   Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Impact Analysis:

The proposed project would require water use to control the dust emissions for soil stockpiling. There are sufficient water supplies available from existing entitlements and resources to serve the project, and no new or expanded entitlements are needed.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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?

Impact Analysis:

The wastewater will be profiled and sent to an off-site treatment and/or disposal facility that is authorized to receive such waste. No additional demand determination is needed from the wastewater treatment provider.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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?

Impact Analysis:

The soil excavated during the implementation of the proposed project will not be disposed at State-licensed facilities. Facility considered for disposal incluude:

- Soil Safe, Inc., 12328 Hibiscus Road, Adelanto, California, and
- Buttonwillow Landfill, 2500 West Lokern Road, Buttonwillow, California

Each of these facilities have sufficient permitted capacity to receive the anticipated solid waste; however, the capacity to accept would be confirmed in advance of transport to a facility.

Solid waste generated by the proposed project would be served by a landfill with sufficient permitted capacity to accept the contaminated soil and asphalt/base rock. A less-than-significant impact would occur to solid waste facilities.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Impact Analysis:

Solid waste generated from the proposed project would be characterized, containerized and transported in accordance with all applicable status and regulations. Therefore, no impacts related to compliance with federal, state, and local management and reduction statutes and regulations related to solid waste would occur.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

Black Rock Geosceinces, 2021, Interim Remedial Action Plan, Former Dicoen Electronics Facility, 2215 South Standard Avenue, Santa Ana, California, revised March 2021.

20. WILDFIRE				
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

No laws, ordinances, regulations, or standards protecting wildfire resources are applicable to the proposed project.

ENVIRONMENTAL SETTING (BASELINE):

The Project Site is located in Santa Ana, which is the fifth largest Orange County city in terms of land area. It consists of 27.3 square miles. Of this total, 58 percent is devoted to residential development, 15 percent to commercial uses, 14 percent to industrial, 11 percent to public and institutional uses, and 2 percent to public parkland and open space. It is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones; therefore, no further analysis is needed.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

Impacts are more likely to occur in areas designated as susceptible to wildfires, or for project that would substantially impair an adopted emergency response plan or emergency evacuation plan.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

No environmental studies were performed for this resource. Readily available information was reviewed for this assessment.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

Impact Analysis:

See Environmental Setting (Baseline).

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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?

Impact Analysis:

See Environmental Setting (Baseline).

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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?

Impact Analysis:

See Environmental Setting (Baseline).

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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?

Impact Analysis:

See Environmental Setting (Baseline).

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

Black Rock Geosceinces, 2021, Interim Remedial Action Plan, Former Dicoen Electronics Facility, 2215 South Standard Avenue, Santa Ana, California, revised March 2021.

21. MANDATORY FINDINGS OF SIGNIFICANCE

Based on evidence provided in this Initial Study, DTSC makes the following findings:

a. The project does not 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.

b. The project does not have impacts that are individually limited but cumulatively considerable. ("Cumulatively considerable" means that the incremental effects of an individual 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.)

c. The project does not have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly.

Authority: Public Resources Code 21083, 21094.5.5
Reference: Public Resources Code Sections 21094.5 and 21094.5.5