

**FINAL**

# **Addendum #16 to the Orange County Great Park Environmental Impact Report (Sch No. 2002101020)**

**2025 Great Park Neighborhoods Zone Change, Implementing  
Approvals and Property Exchange**

**September 2025**

Prepared for:



**City of Irvine, Community Development Department  
One Civic Center Plaza  
Irvine, California 92623**

Prepared by:



**101 Progress, Suite 250  
Irvine, California 92618  
(949) 655-3900**

*This page intentionally left blank.*

## ***Table of Contents***

---

<b>Acronyms and Abbreviations .....</b>	<b>iii</b>
<b>Section 1 Introduction.....</b>	<b>1</b>
1.1 Purpose of Addendum.....	1
1.2 Use of an Addendum to a Previously Certified EIR .....	1
1.3 Previous Environmental Documentation.....	2
1.4 Evaluation of Environmental Impacts .....	7
1.5 Summary of Findings .....	10
<b>Section 2 Environmental Setting and Project Description .....</b>	<b>11</b>
2.1 Project Location and Setting .....	11
2.1.1 Existing Land Uses .....	11
2.2 Project Background.....	11
2.3 Project Description.....	15
<b>Section 3 Environmental Analysis .....</b>	<b>25</b>
3.1 Introduction and Methodology .....	25
3.2 Air Quality .....	25
3.2.1 Summary of Certified EIR Findings.....	25
3.2.2 Impacts of Proposed Project.....	26
3.2.3 PPPs, PDFs, and MMs Applicable to the Proposed Project.....	29
3.3 Greenhouse Gas Emissions.....	35
3.3.1 Summary of Certified EIR Findings.....	35
3.3.2 Impacts of Proposed Project.....	35
3.3.3 PPPs, PDFs, and MMs Applicable to the Proposed Project.....	37
3.4 Noise.....	42
3.4.1 Summary of Certified EIR Findings.....	42
3.4.2 Impacts of Proposed Project.....	42
3.4.3 PPPs, PDFs, and MMs Applicable to the Proposed Project.....	44
3.5 Transportation.....	46
3.5.1 Summary of Certified EIR Findings.....	46
3.5.2 Impacts of Proposed Project.....	47
3.5.3 PPPs, PDFs, and MMs Applicable to the Proposed Project.....	48
3.6 CEQA Guidelines Section 15164: Addendum to an EIR Or Negative Declaration.....	55
<b>Section 4 References .....</b>	<b>57</b>

## Figures

Figure 1	Local Vicinity .....	13
Figure 2	Property Exchange – Heritage Fields to City (District 6) .....	19
Figure 3	Property Exchange – City to Heritage Fields (District 2 and 6) .....	21
Figure 4	Property Exchange – Heritage Fields to City (District 1) .....	23

## Tables

Table 1. Summary of Maximum Daily Criteria Air Pollutant Emissions .....	28
Table 2. Summary of Annual Greenhouse Gas Emissions .....	36

## Appendices

Appendix A	Heritage Fields Project 2012 – General Plan Amendment and Zone Change FSSEIR Amended Mitigation Monitoring and Reporting Program Checklist
Appendix B	Environmental Checklist Form for the 2025 Great Park Neighborhoods Zone Change
Appendix C	Air Quality and GHG Technical Evaluation
Appendix D	Noise Technical Evaluation
Appendix E	Traffic Evaluation

## ***Acronyms and Abbreviations***

---

2003 OCGP FEIR	Orange County Great Park EIR
2011 SEIR	Supplemental EIR prepared in 2011
2012 SSEIR	Second Supplemental EIR prepared in 2012
AB 1881	California Water Conservation in Landscaping Act of 2006
ACM	asbestos-containing materials
ADT	average daily traffic
ARDA	Amended and Restated Development Agreement
C&D	Construction and Demolition
CAFE	Corporate Average Fuel Economy
CAP	criteria air pollutant
CC&Rs	Covenants, Conditions and Restrictions
CEC	California Energy Commission
CEQA	California Environmental Quality Act
City	City of Irvine
CO	carbon monoxide
dB	decibel
dBA	A-weighted decibel
GHG	greenhouse gas
hp	horsepower
I-405	Interstate 405
I-5	Interstate 5
IRWD	Irvine Ranch Water District
IUSD	Irvine Unified School District
LAX	Los Angeles International Airport
LCFS	Low Carbon Fuel Standard
LOS	Level of Service
MCAS	Marine Corps Air Station
MM	Mitigation Measure
MPAH	Master Plan of Arterial Highways
mpg	miles per gallon
NITM	North Irvine Transportation Mitigation
NOX	nitrogen oxides
OCFA	Orange County Fire Authority
OCFCD	Orange County Flood Control District
OCTA	Orange County Transportation Authority
PA	Planning Area
PDF	Project Design Feature
PM10	particulate matter 10 micrometers or smaller
PM2.5	particulate matter 2.5 micrometers or smaller
PPP	Plans, Programs, and Policies
Proposed Project	VTPM 2019-146 Additive City of Hope Outpatient Cancer Center and Inpatient Hospital at FivePoint Gateway Campus Project
RPS	Renewable Portfolio Standard
SB	Senate Bill

SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SO <sub>2</sub>	sulfur dioxide
Spectrumotion	Irvine Spectrum Transportation Management Association
SVUSD	Saddleback Valley Unified School District
TCA	Transportation Corridor Agencies
TMA	Transportation Management Association
TTM/TPM	tentative tract map/tentative parcel map
VMT	vehicle miles traveled
VOC	volatile organic compound

## **Section 1 Introduction**

---

### **1.1 Purpose of Addendum**

Pursuant to the California Environmental Quality Act (CEQA) Public Resources Code Section 21000 et. seq., this addendum is prepared to address, as a project-level analysis, potential environmental impacts of (a) the 2025 Great Park Neighborhoods Zone Change (“Zone Change”); (b) all governmental approvals necessary to construct, develop, and permanently operate and occupy the development authorized by the Zone Change, including without limitation site-specific subdivision maps, master plans, and park plans; and (c) approval of the Affordable Housing and Necessary Government Use Property Exchange Agreement (Agreement) by and between the City of Irvine and Heritage Fields (collectively, the “Proposed Project”) located within the Great Park Neighborhoods (Planning Area [PA] 51) in the City of Irvine, California. This document is an addendum to the Orange County Great Park Environmental Impact Report (2003 OCGP FEIR), Supplemental EIR prepared in 2011 (2011 SEIR), Second Supplemental EIR prepared in 2012 (2012 SSEIR), and 15 addenda prepared between 2006 and 2024. Henceforth, these are collectively referred to as the Certified EIR, and these documents, together with the other documents incorporated by reference herein, serve as the environmental review of the Proposed Project, as required pursuant to the provisions of CEQA, the State CEQA Guidelines of 14 California Code of Regulations Section 15000 et seq., and the City of Irvine (City) procedures for CEQA implementation.

### **1.2 Use of an Addendum to a Previously Certified EIR**

To ensure that the Proposed Project is within the scope of the previously Certified EIR and that no new significant impacts would result, the City reviews each application in accordance with Sections 15162 and 15164 of the State CEQA Guidelines. When necessary, additional environmental analysis is completed consistent with Section 15162, 15163, and/or 15164, including EIR addenda or subsequent/supplemental EIRs.

State CEQA Guidelines Section 15164 states that: “The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR have occurred.” Pursuant to Section 15162 of the State CEQA Guidelines, no subsequent EIR may be required for a project unless the City determines, on the basis of substantial evidence, that one or more of the following conditions are met:

- (a) When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
  - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
  - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
  - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
  - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

### **1.3 Previous Environmental Documentation**

As discussed above, the Certified EIR comprises the 2003 OCGP FEIR, 2011 SEIR, 2012 SSEIR, and 15 addenda prepared between 2006 and 2024.

The OCGP FEIR was originally certified by the City in May 2003. The project analyzed in the OCGP FEIR consisted of the following actions:

- Annexation, General Plan Amendment, Pre-Zoning (prior to annexation), and Zoning of the unincorporated portion of PA 51.
- Annexation of the unincorporated portion of PA 35 (Irvine Ranch Water District Parcel).
- General Plan Amendment and Zone Change for PA 30 (the overall site originally included PAs 30 and 51, which were later merged into a single PA 51; for purposes of this document, both PA 30 and PA 51 will be referred to as PA 51).



- Approval of the form of a Development Agreement vesting approval of overlay uses and intensities in consideration for dedication of land for public purposes and for developing and funding certain infrastructure improvements and maintenance of the public uses by the purchaser/developer and subsequent landowners and funding for specific park, roadways, and other circulation facilities and infrastructure.

In 2011, Heritage Fields sought from the City a series of entitlements, including a General Plan Amendment, a Zone Change, seven subdivision maps, six master plans, and five park plan approvals associated with the private development of a portion of the Heritage Fields–owned property within PA 51 and former PA 30. A supplement to the OCGP FEIR (2011 SEIR) was prepared in connection with those entitlement applications. The 2011 SEIR was approved and certified by the City Council on August 30, 2011.

In 2012, a Second Supplemental EIR (a supplement to the OCGP FEIR [2012 SSEIR]) was prepared to address the environmental impacts associated with the implementation of the Heritage Fields 2012 General Plan Amendment and Zone Change Project, including the 688-acre OCGP Improvement Area. The 2012 SSEIR consisted of the reduction of 410,400 square feet of nonresidential intensity and a corresponding addition of 3,412 dwelling units, as well as 1,194 density bonus units, for a total of 4,606 new dwelling units (i.e., 9,500 total dwelling units). The 2012 SSEIR proposed relocation of certain portions of the approved Wildlife Corridor Feature (Segments 2 and 3). The 2012 SSEIR also analyzed the potential impacts associated with two options for the Main Street development along Trabuco Road east of “O” Street. Additionally, the 2012 SSEIR included implementation of recreational facilities in the previously approved Sports Park District of the OCGP. PA 30 and PA 51 were also combined into a single PA, PA 51, to create a cohesive development governed by a unified set of land use and development regulations. On November 26, 2013, the City Council certified the 2012 SSEIR.

Concurrent with the certification of the 2012 SSEIR, on November 26, 2013, the City Council also approved a contractual agreement (ALA II) with Heritage Fields that obligated Heritage Fields to construct 688 acres of the Great Park (the Design Package). The ALA II included provisions that allowed the City to unilaterally require program changes within the 688-acre OCGP Improvement Area, with respect to the following elements of the Design Package:

- Sand volleyball court, parking, and sports courts within the Sports Park.
- Dog park and mini amphitheater within the Bosque subarea.

On March 18, 2014, the City Council approved the Unilateral Changes to the Design Package of the contractual agreement (ALA II).

In addition to the OCGP FEIR and two supplemental EIRs, 15 Addenda (i.e., Addendum No. 1 through Addendum No. 13) were approved and certified to address the potential environmental

impacts associated with modifications to the OCGP FEIR. A brief overview of these documents is provided below.

- Addendum No. 1, approved by the City on May 18, 2006, augmented the OCGP FEIR to address the potential for environmental issues associated with the implementation of the OCGP Redevelopment Project Area Plan.
- Addendum No. 2 was approved by the City Council on October 24, 2006. This addendum analyzed the potential for environmental issues associated with adjustments to the boundary between the public and private areas of the OCGP, revisions to Zoning Ordinance text and figures related to PAs 30 and 51, the creation of a mixed-use zoning category called the Lifelong Learning District within PA 51, and technical changes to the General Plan, as described in Section 2.3 of Addendum No. 2.
- Addendum No. 3, approved by the City Planning Commission on May 17, 2007, addressed the potential for environmental issues associated with a proposal for the approval of Vesting Tentative Tract Map No. 17008 (Master Subdivision Map).
- Addendum No. 4 was approved by the City Planning Commission on August 2, 2007. This Addendum analyzed the development of the OCGP (Great Park Master Plan), which provides a conceptual design for the future build out of the 1,145-acre park with passive and active features.
- Addendum No. 5, approved by the City Council on July 22, 2008, analyzed changes to figures in the General Plan to reflect the Bake Parkway/Marine Way intersection relocation and the Rockfield Boulevard reconfiguration in the southern portion of PA 30; amendments to the Orange County Transportation Authority's (OCTA's) Master Plan of Arterial Highways; the City- Heritage Fields Development Agreement; and related changes to the City's General Plan and Zoning Ordinance.
- Addendum No. 6, approved by the City Planning Commission on October 16, 2008, analyzed the potential for environmental issues associated with requested entitlements, including amended Vesting Tentative Tract Map No. 17008, Vesting Tentative Tract Map No. 17283, modification to OCGP Streetscape Design Guidelines, the Master Landscape and Trails Plan, and the Master Plan for Nonresidential Development within the Lifelong Learning District.
- Addendum No. 7 to the 2003 OCGP EIR, approved by the City on June 29, 2010, was prepared in connection with revisions to the North Irvine Transportation Mitigation (NITM) Program. The update removed planned traffic improvements at seven intersections from the list of traffic mitigation measures in the OCGP FEIR.
- Addendum No. 8 was prepared analyzing the potential environmental issues associated with a minor modification to the Great Park Master Plan and Park Design, which was associated with implementation of the Western Sector Park Development Plan Phase I. The minor modification proposed transferring nonresidential square footage from the

- central area (i.e., Cultural Terrace) to the southwestern area of the OCGP (i.e., Sports Park); removing the Air Museum and Concessions/Retail and replacing them with the Artist in Residency Facility, the proposed Community Ice Facility, and the proposed Nature Education Garden; and replacing the existing Air Museum Hangar with Hangar 244. Addendum No. 8 was approved by the City on October 20, 2011.
- Addendum No. 9 to the 2003 OCGP EIR, approved by the City in July 2014, addressed potential environmental impacts associated with the modifications to the 688-acre OCGP Improvement Area, which included both the Unilateral Program Changes allowed in the ALA II and other staff- recommended changes to OCGP Improvement Area 1. The proposed modifications to the OCGP Improvement Area were within the Bosque and Sports Park Districts. Additionally, two design features of the project that would be incorporated upon project implementation included dual 250-foot-long eastbound left-turn pockets at Marine Way and Great Park Boulevard West (Great Park Street 1), and a 250-foot-long westbound right-turn lane at the Marine Way right-in/right- out driveway, west of Great Park Boulevard (West) (Great Park Street 1).
  - Addendum No. 10 to the 2003 OCGP EIR, approved by the City in February 2016, addressed potential environmental impacts associated with the development of a four-sheet Community Ice Facility consisting of approximately 270,000 square feet. Accessory uses included locker facilities, a lobby, skating support and retail spaces (including a pro shop, party rooms, and a restaurant), a dedicated figure skating room, administrative space, mechanical/electrical space, and training and team space. One ice sheet/rink would be developed to Olympic standards (e.g., 100 feet by 200 feet), with a 2,500-seat seating area. Each of the remaining three ice sheets/rinks would be developed to National Hockey League standards (e.g., 85 feet by 200 feet), with a 500-seat seating area (4,000 seats total). The Community Ice Facility would include the development of no less than 665 parking spaces on the premises.
  - Addendum No. 11 to the 2003 OCGP EIR, approved by the City in March 2017, addressed potential environmental impacts associated with the development of temporary use of an Interim Amphitheater. The amphitheater would be within Development District 6 of the Great Park Neighborhoods. The Interim Amphitheater would consist of approximately 320,000 square feet, would accommodate 12,000 visitors, and would include a request for the issuance of an Interim Use Permit over a 3-year period.
  - Addendum No. 12 to the 2003 OCGP EIR, approved by the City in March 2019, addressed potential environmental impacts associated with the reclassification of 1,056 not-for-profit affordable units within the Great Park Neighborhoods (PA 51) as an institutional use and “additive” to the overall residential development of 9,500 dwelling units approved for PA 51. Under the project analyzed by Addendum No. 12 and approved by the City in March 2019, full buildout of the Great Park Neighborhoods

consists of 9,500 dwelling units, 1,056 additive affordable housing units, and 4,902,200 square feet of nonresidential uses.

- Addendum No. 13 to the 2003 OCGP EIR, approved by the City in December 2019, addressed potential environmental impacts associated with an approximately 250,000 square foot City of Hope Cancer Center and Hospital, consisting of an approximately 190,000 square foot outpatient cancer center and a 60,000 square foot inpatient hospital, within the Great Park Neighborhoods (Planning Area 51) classified as “additive.” The outpatient cancer center would be located within Building 5 of the FivePoint Gateway Campus, which has already been constructed. The inpatient hospital would consist of new construction adjacent to Building 5. The Proposed Project has the same total 10,556 units as the Baseline (Approved) Project and would be located within the existing office campus within Great Park Neighborhoods District 3 of PA 51. Under the project analyzed by Addendum No. 13 and approved by the City in December 2019, full buildout of the Great Park Neighborhoods would consist of 10,556 dwelling units, and 5,152,200 square feet of nonresidential uses. The City subsequently determined in July of 2020 and April of 2022 that a combined total of 359,064 square feet of additive development intensity for an inpatient hospital and outpatient cancer center was within the scope of impacts previously analyzed by Addendum No. 13.
- Addendum No. 14 to the 2003 OCGP EIR, approved by the City in December 2020, addressed potential environmental impacts associated with the development of a new waterpark with associated parking and guest facilities on approximately 20 acres of the 35-acre site. The waterpark development included construction of an approximately 1,232-space surface parking lot which would be used by the waterpark during its operating season and hours of operation, as well as the construction of Wild Rivers Access Road from the existing roundabout of Great Park Boulevard at Skyhawk to the eastern boundary of the waterpark site. The Addendum concluded that the construction and operation of the waterpark would not result in any new or substantially more severe significant impacts compared to those previously analyzed and discussed in the FEIR.
- Addendum No. 15 to the 2003 OCGP EIR, approved by the City in September 2022, addressed potential environmental impacts associated with Great Park Master Plan Modification No. 5 to allow the development of a permanent Great Park Amphitheater. The permanent amphitheater will accommodate between 8,000 to 10,000 seats and will be located north of Great Park Boulevard and east of the Skyhawk intersection on an approximately 42-acre site in the Great Park (GP) portion of Planning Area (PA) 51. The Addendum addressed the potential for environmental impacts associated with the Amphitheater Project. The Amphitheater Project is zoned 1.9, Great Park, which is characterized as a multi-destination facility that will include a variety of educational and recreational activities, including sports fields, museums, gardens, trails, wildlife

habitat and many other public-oriented land uses. The Amphitheater Project hours of operation will vary depending upon the performance. However, events will typically start at 7:00 pm and finish at 11:00 pm, with parking areas and amphitheater doors/gates open to the public approximately 90 minutes before the start of the performance. The Amphitheater Project does not include any changes to the approved and environmentally reviewed development intensities within PA 51. Addendum No. 15 concluded that the permanent Great Park Amphitheater would not result in any new significant environmental impacts. Additionally, it concluded that all applicable mitigation measures from the original FEIR have been incorporated into the project.

Together, these actions establish the policy and legislative structure and site-specific approvals to guide the development of the former Marine Corps Air Station (MCAS) El Toro property.

The Certified EIR mitigation measures are provided in the adopted Mitigation Monitoring and Reporting Program included in Appendix A. The table includes:

- Mitigation measure number and a description of the action
- Timing for implementation
- Approving authority and reviewing agency(s), if any
- Method of compliance

The Certified EIR is on file and can be reviewed at the City Community Development Department at One Civic Center Plaza, Irvine, California 92623.

## **1.4 Evaluation of Environmental Impacts**

This document, prepared pursuant to CEQA, constitutes an addendum to the Certified EIR. This addendum, together with the Certified EIR and the other documents incorporated by reference herein, serve as the environmental review of the Proposed Project, as required pursuant to the provisions of CEQA, the State CEQA Guidelines, and City procedures for CEQA implementation.

Section 15168(c)(4) of the CEQA Guidelines recommends that a lead agency “use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were covered in the [previously certified] program EIR.” Pursuant to Section 15168(c)(4), this addendum utilizes an Environmental Checklist Form to assist in the evaluation as to whether the conditions set forth in Section 15162 of the State CEQA Guidelines that would require a subsequent or supplemental EIR are met, and whether there are new significant impacts resulting from the Proposed Project. The Environmental Checklist Form is used to review the potential environmental effects of the Proposed Project for each of the following areas.<sup>1</sup>

---

<sup>1</sup> The Environmental Checklist Form set forth here are from the CEQA Guidelines Update approved by the California Office of Administrative Law in December 2018.

- Aesthetics
- Agricultural and forestry resources
- Air quality
- Biological resources
- Cultural resources
- Geology and soils
- Greenhouse gas emissions
- Energy
- Hazards and hazardous materials
- Hydrology and water quality
- Land use and planning
- Mineral resources
- Noise
- Population and housing
- Public services
- Recreation
- Transportation
- Tribal cultural resources
- Utilities and service systems
- Wildfire

The Environmental Checklist Form prepared for this project is found in Appendix B of this addendum. It contains a series of questions about the project for each of the impact categories. There are six possible responses to each of the questions included on the Environmental Checklist Form, as follows.

1. Substantial change in project requiring major EIR revisions
2. Substantial change in circumstances requiring major EIR revisions
3. New information resulting in new significant impacts
4. New information resulting in more severe impacts
5. New information identifying new mitigation measures available to reduce significant impacts
6. Less than significant impact/no substantial change from previous analysis

As summarized in Appendix B, all of the potentially significant environmental impacts were ultimately determined to be less than significant or were reduced to a level that is considered less than significant through either the adoption of previously identified mitigation measures or the incorporation of previously identified project design features. More specifically, the Environmental Checklist and accompanying analysis in Appendix B, as well as the analysis contained in the Certified EIR, indicate that impacts of the Proposed Project related to aesthetics, agriculture and forestry resources, biological resources, cultural resources, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, population and housing, public services, recreation, tribal cultural resources, utilities and service systems, and wildfire would be less than significant.

The Environmental Checklist in Appendix B indicates that the additional analysis and technical studies contained in the addendum, together with the discussion and analysis contained in the Certified EIR, should be provided to further evaluate whether the Proposed Project could cause new or substantially more severe significant impacts compared to those previously analyzed and discussed in the Certified EIR as to air quality, greenhouse gas emissions, traffic, and noise.

This analysis and discussion contained in this addendum indicate that the Proposed Project would not result in new or substantially more severe significant impacts compared to those previously analyzed and discussed in the Certified EIR for all impact areas, including air quality, greenhouse gas emissions, noise and transportation.

## **1.5 Summary of Findings**

As described herein, there would be no new significant impacts resulting from the Proposed Project, nor would there be any substantial increases in the severity of any previously identified environmental impacts. The Proposed Project's effects were covered in the Certified EIR. There is no new information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the Certified EIR was certified that shows any of the circumstances set forth in Section 15162(a)(3) of the CEQA Guidelines. All feasible mitigation measures and alternatives have been incorporated into the Proposed Project.

After careful consideration of the potential environmental impacts of the Proposed Project, the City has determined that 1) none of the conditions requiring preparation of a subsequent or supplement to an EIR have occurred, and 2) the circumstances described in Section 15164 of the CEQA Guidelines exist. Therefore, an addendum to the Certified EIR is appropriate.



## **Section 2    Environmental Setting and Project Description**

---

### **2.1    Project Location and Setting**

The “Project Site” is located in the Great Park Neighborhoods, also known as PA 51. The Great Park Neighborhoods consists of eight existing Development Districts on a portion of the former MCAS northeast of the freeway junction of Interstate 5 (I-5) and Interstate 405 (I-405) in the eastern portion of Irvine, California. Specifically, the Proposed Project affects portions of District 6 and District 2, as well as the conveyance of land from Heritage Fields to the City within District 1, all as shown on Figure 1, Local Vicinity.

The Great Park Neighborhoods is generally bound by the Eastern Transportation Corridor to the west, the Foothill Transportation Corridor to the north, the Southern California Regional Rail Authority rail lines to the south, and Borrego channel near Alton Parkway to the east. The major roadways bordering the project site are Sand Canyon Avenue to the west, Portola Parkway to the north, and Alton Parkway to the east. The Irvine Station is adjacent to the Southern California Regional Rail Authority rail lines that traverse the Project Site in the south. Surrounding the project area are residential and nonresidential uses to the north and west, open space to the northeast, and nonresidential and mixed land uses to the east and southeast within the cities of Lake Forest and Irvine.

#### **2.1.1    Existing Land Uses**

PA 51 is in the central-eastern portion of the city of Irvine in Orange County, approximately 45 miles southeast of the county of Los Angeles. Great Park Neighborhoods is a mixed-use, master planned community surrounding the Orange County Great Park. Offering distinct neighborhoods and park-side living, Great Park Neighborhoods is currently home to the Pavilion Park, Beacon Park, Parasol Park, and Cadence Park neighborhoods. Existing land uses include residential, retail, office, educational, and recreational uses. Great Park Neighborhoods also includes miles of public hiking and biking trails linking to the Cleveland National Forest, the Orange County Great Park, and the Irvine Transit Center.

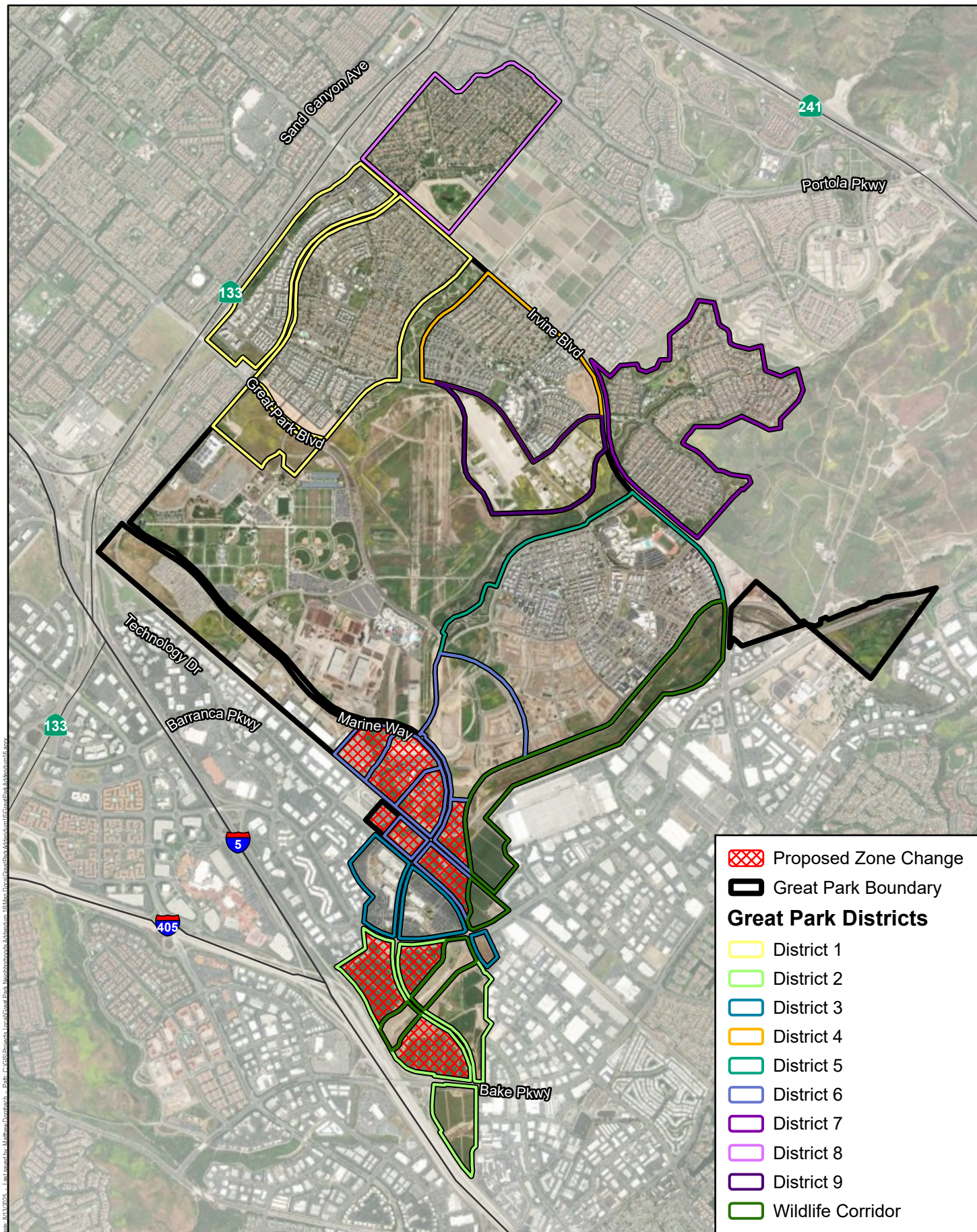
### **2.2    Project Background**

As described in Chapter 1, Introduction, all development within the Great Park Neighborhoods is covered by the Certified EIR. The 2012 SSEIR analyzed two potential buildout scenarios for the Great Park Neighborhoods:

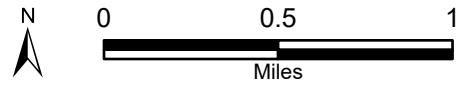
1. Up to 9,500 residential units and 4,902,200 square feet of nonresidential development.
2. An option to convert up to 535,000 square feet of nonresidential Multi-Use to an additional 889 dwelling units (and 311 density bonus units), for a revised total of up to 10,700 dwelling units (including 1,194 density bonus units).

*This page intentionally left blank.*





Source: Maxar Imagery, 2023; City of Irvine, 2025.



**Figure 1**

Local Vicinity

*This page intentionally left blank.*



The Baseline (Approved) Project consists of the development of up to 10,556 dwelling units and 4,902,200 square feet of nonresidential uses (as well as an additional 359,064 square feet of additive non-residential square footage for the City of Hope Cancer Center and Hospital described above) within PA 51.

## **2.3 Project Description**

The Proposed Project would amend the zoning applicable to certain portions of Districts 2 and 6 within Planning Area 51 to allow for up to 1,300 additional dwelling units to be built by converting up to 755,549 square feet of the previously approved and vested non-residential entitlements to new residential uses. If the Proposed Project is approved, Planning Area 51 could be developed with a cumulative total of up to 11,856 dwelling units and 4,146,651 square feet of nonresidential uses (as well as an additional 359,064 square feet of additive non-residential square footage for the City of Hope Cancer Center and Hospital described above). Similar to the conversion framework that has been successfully implemented in other Planning Areas within the City, any conversion would occur only upon submittal of a future site-specific development application, and would be based on an equivalent trip basis. In addition, the Proposed Project involves a property exchange between the City and Heritage Fields pursuant to the Affordable Housing and Necessary Government Use Property Exchange Agreement, as described below. Finally, the Proposed Project includes the construction, development, and permanent occupancy of the additional residential units that would be authorized by the Zone Change. This includes all approvals necessary to allow for this development, including without limitation site-specific subdivision maps and master plans.

### **General Plan Amendment**

A General Plan Amendment is proposed to clarify certain implementation provisions so as to ensure internal consistency within the General Plan Land Use Element and between the General Plan and the City's Zoning Ordinance. This General Plan Amendment expressly recognizes the proposed Zone Change by implementing the following two technical clarifications:

- Modify Table A-1 to include footnotes 30 and 31 for Planning Area 51, as described below.
- Update Figure 3 of the Land Use Element to recognize the 8.1C zoning proposed consistent with the requested Zone Change.

Footnote 30: "For Planning Area 51, the applicant on Heritage Fields Property (as defined in and designated from time to time under the Amended and Restated Development Agreement adopted pursuant to City Council Ordinance 09-09) shall have the right to develop 1,300 (or fewer at the election of the applicant) additional dwelling units (in excess of 10,556) in exchange for a

reduction of non-residential square footage in Area 8.1C on the basis of equivalent traffic generation as set forth in Footnote 31.”

Footnote 31: “For the purposes of Footnote 30, to the degree residential units are built on Heritage Fields Property (as defined in and designated from time to time under the Amended and Restated Development Agreement adopted pursuant to City Council Ordinance 09-09) in the 8.1C Trails and Transit Oriented Development area, a corresponding reduction in allowable nonresidential intensity shall occur in terms of equivalent traffic generation based on a.m. peak, p.m. peak, and average daily trips (ADT). The actual amount of reduction will be based on the ITAM trip generate rates applicable to Planning Area 51 and included in the “Heritage Fields Project 2012 General Plan Amendment and Zone Change Traffic Impact Analysis”, approved November 2013.”

## **Zone Change**

A new zoning designation, 8.1C Trails and Transit Oriented Development, would be created over certain undeveloped portions of Planning Area 51 more specifically depicted on the accompanying Zoning Section 9-51 and Zoning Section 3-37-39. To the extent that residential units are built on Heritage Fields Property (as defined in and designated from time to time under the ARDA) within the 8.1C Trails and Transit Oriented Development, a corresponding reduction in the allowable nonresidential intensity shall occur in terms of equivalent traffic generated. The actual amount of reduction in nonresidential intensity will be based upon AM Peak, PM Peak, and average daily trips (“ADT”). In addition, the proposed Zone Change would include conforming revisions to the Planning Area 51 District Character descriptions for District 2 and 6 in order to recognize the new residential development opportunities created by the proposed Zone Change.

More specifically, the proposed Zone Change would:

- Add the 8.1C Trails and Transit Oriented Development designation to the Section 9-51-3 Statistical Analysis table and add footnote (9) which describes the potential conversion of nonresidential to residential uses.
- Modify footnote (2) in the Section 9-51-3 Statistical Analysis table to clarify the table’s recognition of previously entitled and vested additive units.
- Modify the zoning exhibit in Section 9-51-3 to identify the areas which would be zoned 8.1C.
- Modify Section 9-51-6(B) to clarify the discussion of the current maximum authorized residential intensity, including additive units, as well as allow for the potential of up to an additional 1,300 residential units within the 8.1C-zoned areas.
- Modify Section 9-51-6(D)b.vii to describe additional development monitoring parameters.
- Modify Section 9-51-6(Q)ii to allow for residential development within District 2.

- Modify Section 9-51-6(Q)vi to include a description of the mixed-use urban core connecting to the Great Park Cultural Terrace and revise the development description of the area outside of the mixed-use urban core to account for the new residential development allowance provided by the proposed Zone Change.
- Modify Section 9-51-6(T)ii to include the methodology to convert nonresidential uses to residential units on an equivalent trip basis.
- Modify Section 3-37-39. - 8.1 Trails and Transit Oriented Development to revise the applicable development standards consistent with the proposed Zone Change
- Implement miscellaneous conforming changes in other portions of Chapter 9-51.

## **Property Exchange**

The Proposed Project involves a property exchange between the City and Heritage Fields pursuant to the Affordable Housing and Necessary Government Use Property Exchange Agreement (“Agreement”). Pursuant to the Agreement, the Project Applicant (Heritage Fields El Toro, LLC) will transfer approximately 35.7 acres of land under its ownership within Districts 1 and 6 to the City (“HF to City Land”), and the City will transfer approximately 26.4 acres of land under their ownership within Districts 2 and 6 to Heritage Fields (City to HF Land) (see Figures 2 through 4). The City to HF Land may be used for purposes analyzed under the Certified EIR consistent with the Baseline (Approved) Project, or in accordance with the Zone Change and other approvals under the Proposed Project, as analyzed in this Addendum. The HF to City Land may be used for purposes subject to the City’s discretion, consistent with the Great Park Framework Plan (the “Framework Plan”) approved in July of 2022 by the Great Park Board of Directors and City Council of the City of Irvine, or for such other as yet to be determined purposes that may be subsequently identified by the City from time to time. The Proposed Project does not identify, nor authorize, any particular use of the HF to City Land. Accordingly, any such future uses would be subject to independent analysis under CEQA if and once the City determines the precise uses of the HF to City Land.

## **Site-Specific Approvals**

As noted above, this analysis includes an assessment of the impacts arising from the full build-out of the maximum amount of conversion of non-residential uses into multi-family dwelling units that would be allowed by the Zone Change, and the impacts of all site-specific subdivision maps and master plans necessary to implement that conversion of non-residential uses into the maximum 1,300 multi-family dwelling units authorized by the Zone Change. However, it is acknowledged the subdivision plans and master plans ultimately applied for might ultimately include a somewhat smaller amount of conversion than the maximum potential conversion that would be allowed by the Zone Change. To date, the applicant has applied for the following site-specific applications, among others:

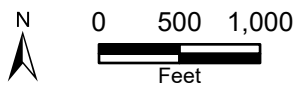
- District 2 - Vesting Tentative Tract Map 19402 (00956291-PTT), Master Plan (00956303-PMP), and Park Plan (00956302-PPP)
- District 2 - Vesting Tentative Tract Map 19403 (00956308-PTT), Master Plan (00956311-PMP), and Park Plan (00956398-PPP)
- District 6 - Vesting Tentative Tract Map 19404 (00956315-PTT), Master Plan (00956326-PMP), and Park Plan (00956323-PPP)
- District 6 - Vesting Tentative Tract Map 19405 (00956329-PTT) and Master Plan (00956330-PMP)
- District 6 - Vesting Tentative Tract Map 19406 (00956332-PTT) and Master Plan (00956335-PMP)
- District 6 - Master Plan Modification (00956567-PMP)
- District 5/6 - Park Plan Modification for VTTM 19405 and 19406 (00957202-PPK)
- Modification to District 5/District 6 Community Design Features (00956969-PMP)
- Modification to District 5/District 6 Sustainable Checklist (00956969-PMP).
- Modification to District2/District 3/District 6 Community Design Features (00959369-PMP)
- Modification to District2/District 3/District 6 Sustainable Checklist (00959369-PMP)

To address this issue, the analysis qualitatively evaluated whether the addition of only 1,123 multi-family dwelling units (which would result in a 1.6% decrease in the number of multi family dwelling units and a corresponding increase of 3.6% in office square footage as compared to the Proposed Project). It is concluded that these kind of slight differences in land uses would not generate any new significant impacts or substantial increases in severity as compared to the Baseline (Approved) Project, or the results of the analysis for the Proposed Project. Therefore, subdivision maps and master plans (and other site-specific approvals) that allow for the conversion of 1,123 or similar number of multi-family dwelling units would also be within the scope of analysis provided for the Proposed Project, and no additional AQ or GHG analysis would be required for such approvals.





Source: Maxar Imagery, 2023; City of Irvine, 2025.



**Figure 2**

Property Exchange – Heritage Fields to City (District 6)

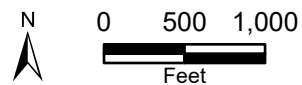
Five Point Great Park Neighborhoods Addendum 16

*This page intentionally left blank.*





Source: Maxar Imagery, 2023; City of Irvine, 2025.



**Figure 3**

Property Exchange – City to Heritage Fields (District 2 and 6)

Five Point Great Park Neighborhoods Addendum 16

*This page intentionally left blank.*





Source: Maxar Imagery, 2023; City of Irvine, 2025.



**Figure 4**

Property Exchange – Heritage Fields to City (District 1)

Five Point Great Park Neighborhoods Addendum 16



*This page intentionally left blank.*

## Section 3 Environmental Analysis

---

### 3.1 Introduction and Methodology

This chapter presents the environmental analysis of the impacts determined to be potentially significant as a result of the Proposed Project. As discussed in Chapter 1, environmental issues that would not have impacts as a result of the Proposed Project, or have impacts that were previously found to be less than significant, are not addressed further in this chapter and are evaluated in Appendix B, Environmental Checklist.

The analysis contained within this chapter addresses the changes to impacts identified in the Certified EIR that could occur as a result of the Proposed Project. The section briefly summarizes the conclusions of the Certified EIR, and then discusses whether the Proposed Project is consistent with the findings contained in the Certified EIR. Mitigation measures from the Certified EIR are incorporated into the Proposed Project where applicable. Those measures and requirements fall into the following three categories:

- **Existing Plans, Programs, and Policies (PPP):** These measures include existing regulatory requirements or plans and programs that are applicable to the Proposed Project. For example, existing standard conditions set forth by the City, such as the requirement that new structures meet seismic safety requirements (i.e., Uniform Building Code requirements), serve to reduce the potential for new development within the Project Site to be significantly affected by possible seismic events.
- **Project Design Features (PDF):** The analysis of each topic includes a description of any PDFs proposed by the City that are specifically intended and designed to reduce or avoid impacts.
- **Mitigation Measures (MM):** For those issue areas where the impacts analysis determines that implementation of the Proposed Project would result in significant impacts, mitigation measures are proposed in accordance with the requirements of CEQA.

### 3.2 Air Quality

#### 3.2.1 Summary of Certified EIR Findings

The Certified EIR identified significant and unavoidable air quality impacts associated with construction and operation of the Approved Project. The Certified EIR described the construction impacts after mitigation as significant and unavoidable for volatile organic compounds (VOC), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), particulate matter 10 micrometers or smaller (PM<sub>10</sub>), and particulate matter 2.5 micrometers or smaller (PM<sub>2.5</sub>). Specifically, construction emissions were considered for the residential and non-residential development of Districts 1 North, 1 South, 2, 3, 4, 5, 6, 7, and 8. The duration of the individual construction phases for the development of these districts ranged from 20 days to 2,100 days and involved air compressors,

cranes, forklifts, generator sets, tractors/loaders/backhoes, welders, concrete/industrial saws, excavators, graders, rubber tired dozers, scrapers, cement and mortar mixers, pavers, paving equipment, and rollers.

Among the various sources of a project's operational emissions, those attributable to mobile sources (i.e., vehicular traffic) make up the largest proportion of emissions. Mobile source emissions are a function of both the number and trip length characteristics of vehicle trips directly and indirectly associated with the project under consideration. Operational emissions for project area and mobile sources were estimated to be above the significance thresholds for VOCs, NO<sub>x</sub>, CO, and PM<sub>2.5</sub>, and they are described in the Certified EIR as significant and unavoidable after mitigation. In addition, the Certified EIR included the results of the CO "hotspots" analysis, in which no intersections in the traffic study area were expected to result in 1-hour or 8-hour CO concentrations above the state standard of 20 parts per million for 1-hour concentrations and 9 parts per million for 8-hour concentrations. No other construction- or operations-related significant air quality impacts were identified in the Certified EIR.

PPPs 3-1 through 3-4 and Mitigation Measures AQ-1 and AQ-2 were identified in the Certified EIR to reduce construction emissions to the extent feasible; however, the impact was determined to remain significant and unavoidable after mitigation. In addition, long-term operation of the Proposed Project would result in significant and unavoidable impacts due to the estimated emission levels of VOC, NO<sub>x</sub>, CO, and PM<sub>2.5</sub>. PPPs 3-1 and 3-5, PDFs 4-1, 4-2, 4-7, 4-8, and 4-9, and Mitigation Measures AQ-3 through AQ-5 were identified to reduce operational phase air quality impacts to the extent feasible; however, the impacts were concluded to remain significant and unavoidable after mitigation.

### **3.2.2 Impacts of Proposed Project**

#### **Construction Emissions**

While refinements have occurred in the identified land uses in the Proposed Project as compared to the Baseline (Approved) Project, the nature and amount of development remains consistent with the allowable land uses contemplated by the Baseline (Approved) Project and would require a similar level of construction equipment activity on the day with the maximum emissions.<sup>2</sup>

The Proposed Project footprint for horizontal construction (e.g., site preparation, grading, demolition, and utilities installation) is consistent with the Baseline (Approved) Project since the change in land use sizing is limited in scale. The quantity of construction equipment needed for grading or soil movement will be consistent between the Proposed Project and the Baseline

---

<sup>2</sup> Per communications regarding analysis of construction parameters with FivePoint, as development manager of the Proposed Project.



(Approved) Project. Accordingly, the construction emissions from horizontal construction phases would not increase for the Proposed Project compared to the Baseline (Approved) Project.

While the Proposed Project will result in a change in building types compared to what was analyzed in the Baseline (Approved) Project, the amount of vertical construction evaluated is not expected to change relative to what was evaluated in the Baseline (Approved) Project since non-residential development would be reduced in proportion to the increase in residential development. Furthermore, since the maximum daily AQ construction equipment and activity are reasonably expected to be the same as those analyzed in the Baseline (Approved) Project, the maximum daily construction emissions also would not change. Overall, the construction emissions from the Proposed Project will not result in a new significant impact when compared to construction emissions expected from the Baseline (Approved) Project. A health risk assessment is not required based on a variety of factors. Notably, the South Coast Air Quality Management District (SCAQMD) does not require a health risk assessment for construction emissions, as the nature of construction emissions is generally considered short-term, and the potential for health risk impacts is dependent on the amount and duration of emissions, and the proximity of sensitive receptors. A construction HRA was not performed as part of the SSEIR based on an assessment related to the nature of the emissions (i.e., that they are relatively short-term) and proximity to potential sensitive receptors (i.e., that there were not sensitive receptors that were particularly close to the Proposed Project). As shown in Table 1, the additional 1,300 condominium units authorized by the Proposed Project, (as well as the increase in office park square footage, and refinements to include fast food and warehouse space that were included in this analysis in order to provide a more conservative analysis that accurately accounts for the current uses that would be permissible within Planning Area 51) are offset by decreases in the square footage of various other non-residential land uses, including elimination of the hotel and health club. The level of increase in construction emissions (estimated to be less than 7% based on the GHG emissions) is also small. Thus, the overall nature of construction emissions has not changed substantively from the SSEIR, and the small increase in construction emissions for the Proposed Project is not expected to substantively change the potential health risk from construction emissions.

Overall, the construction emissions from the Proposed Project will not result in a new significant impact when compared to construction emissions expected from the Baseline (Approved) Project.

## **Operational Emissions**

Operational emissions associated with the Approved (Baseline) Project and Proposed Project have been calculated using CalEEMod®, version 2016.3.2 to maintain methodological consistency with the Certified EIR and allow a like for like comparison. However, a newer version of the model, CalEEMod® 2022.1.1 is now available. Therefore, a sensitivity analysis was also conducted to evaluate the AQ and GHG impacts of the Proposed Project operation relative to the Baseline (Approved) Project using CalEEMod® 2022.1.1 When comparing the Proposed Project emissions

to the SSEIR emissions, Table 1 (Table 7, Appendix C) shows that the operational emissions associated with both the Proposed Project and the Baseline (Approved) Project are below South Coast Air Quality Management District's (SCAQMD's) mass emission significance thresholds for sulfur dioxide (SO<sub>2</sub>) and PM<sub>10</sub>, and greater than SCAQMD mass emissions significance thresholds for VOC, NO<sub>x</sub>, CO, and PM<sub>2.5</sub>. The table also shows that the incremental change in the maximum daily criteria air pollutant (CAP) emissions for the Proposed Project as compared to the Baseline (Approved) Project is lower than the SCAQMD significant thresholds for daily operational CAP mass emissions. The Proposed Project would not cause a new or substantial increase in operational CAP emissions as compared to those previously reported in the Certified EIR for the Baseline (Approved) Project. Therefore, in accordance with Section 15162 of the CEQA Guidelines, the Proposed Project would not result in an increase in the severity of any previously identified significant impacts compared to the Baseline (Approved) Project; no major revisions to the Certified EIR are required.

With regards to the Property Exchange, no change in the allowable uses or intensity of development within Districts would occur beyond that analyzed for purposes of the Zone Change and discussed above. Additionally, it is concluded that the site-specific subdivision and master plan approvals, as currently proposed, would not generate any new significant impacts or substantial increases in severity as compared to the Baseline (Approved) Project, or the results of the analysis for the Proposed Project. Therefore, the subdivision maps and master plans (and other site-specific approvals) would also be within the scope of analysis provided for the Proposed Project. Therefore, in accordance with Section 15162 of the CEQA Guidelines, the Proposed Project would not result in an increase in the severity of any previously identified significant impacts compared to the Baseline (Approved) Project; no major revisions to the Certified EIR are required.

**Table 1. Summary of Maximum Daily Criteria Air Pollutant Emissions**

Project Analyzed	Maximum Daily Emissions (lb/day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Proposed Project	714	561	2,699	8	137	70
SCAQMD Significance Threshold	55	55	550	150	150	55
Baseline (Approved Project Reported Emissions)	677	655	2,545	8	134	68
Change from Baseline (Approved) Project Emissions	37	-95	154	0	3	2
New Significant Impact or Substantial Change?	No	No	No	No	No	No

An analysis of the SCAQMD's Localized Significance Threshold (LST)) methodology<sup>3</sup> is not required to assess for localized impacts for operational emissions since neither the Baseline

<sup>3</sup> SCAQMD. Final Localized Significance Threshold Methodology. June 2003. Available at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=2>. Accessed: November 2019.

(Approved) Project nor the Proposed Project include any of the land uses that would suggest an LST analysis needs to be performed. The primary emissions from operational activities that could (in other circumstances) call for an LST analysis include, but are not limited to, NOX and CO combustion emissions from substantial stationary sources such as flares and large combustion devices, and/or substantial on-site mobile sources such as earth-moving equipment. None of these uses would be introduced by the Proposed Project.

The Proposed Project could include emergency generators for back-up power. However, these generators are expected to operate only in the event of an emergency power failure or for routine maintenance and testing. Furthermore, other combustion sources (e.g., landscaping equipment, small natural gas burning devices such as stoves and water heaters) will result in minimal emissions for the area of the Project, and thus an LST analysis is not required. These sources would exist under the Baseline (Approved) Project, and are not new types of sources for the Proposed Project. Hence, the Project would not create a significant air quality or health risk impact.

The SSEIR included a CO hot-spot analysis to evaluate if increases in traffic volumes at intersections in and around the Project site would generate exceedances of the 1-hour CO ambient air quality standard. The SSEIR estimated the highest average daily trips at an intersection as 120,604, which is well below the threshold of 400,000 vehicles per day<sup>4</sup> that would likely result in an CO exceedance. Hence, the SSEIR concluded that the Project would not generate any CO exceedances. The Proposed Project is not expected to increase average daily trips at intersections to values over the 400,000 vehicles per day threshold.<sup>5</sup> Hence, the Proposed Project would not generate exceedances of the 1-hour CO ambient air quality standard.

The Proposed Project would allow for up to 1,300 additional dwelling units to be built by converting up to 755,552 square feet of the previously approved and vested non-residential entitlements to new residential uses. As noted above, these slight differences in land uses would not generate any new significant impacts or substantial increases in severity as compared to the Baseline (Approved) Project, or the results of the analysis for the Proposed Project. Additionally, the Proposed Project would not result in nuisance odors and therefore would have a less than significant odor impact, consistent with the Approved Project and the conclusions in the Certified EIR.

### **3.2.3 PPPs, PDFs, and MMs Applicable to the Proposed Project**

The Certified EIR identified Mitigation Measures AQ-1 through AQ-5, PPP 3-1 through 3-5, and PDFs 4-1, 4-2, and 4-7 through 4-9, which, if implemented, would reduce the effects of the project.

---

<sup>4</sup> This threshold was estimated in the SSEIR based on the CO hot spot analysis in SCAQMD's 1992 Federal Attainment Plan for Carbon Monoxide.

<sup>5</sup> Per 2025 Addendum #16 Trip Generation Assessment from Urban Crossroads.

However, construction and operational impacts to Air Quality would remain significant and unavoidable.

The following mitigation measures are applicable to the Proposed Project and will help reduce or avoid its potential air quality impacts.

### **Construction Phase**

**AQ-1** Prior to the start of demolition and construction within the project area, adjacent sensitive receptors shall be informed of the planned demolition and construction activities. Measures to avoid significantly impacting these receptors shall be developed and implemented by the project proponent in coordination with these uses. Other applicable mitigation measures such as erection of fences around construction areas; staggered use of equipment near sensitive receptors; diversion of truck trips away from receptors; etc.; shall be employed as necessary. Compliance with this measure shall be verified by the Director of Community Development.

**AQ-2** Prior to the commencement of construction activities required to demolish and/or remove existing DON structures, including runways, the Director of Community Development shall receive and approve a construction emissions mitigation plan from the chosen demolition contractor. Prior to the issuance of grading permits, the applicant of any future development project shall submit, and the Director of Community Development shall approve a construction emissions mitigation plan. The plan shall identify implementation procedures for each of the following emissions reduction measures and all feasible mitigation measures shall be implemented. If certain measures are determined infeasible, an explanation thereof shall be provided.

- Utilize off-road construction equipment that conforms to Tier 3 of the United States Environmental Protection Agency, or higher emissions standards for construction equipment over 50 horsepower that are commercially available. The construction contractor shall be made aware of this requirement prior to the start of construction activities. Use of commercially available Tier 3 or higher off-road equipment, which is:
  - Year 2006 or newer construction equipment for engines rated equal to 175 horsepower (hp) and greater;
  - Year 2007 and newer construction equipment for engines rated equal to 100 hp but less than 175 hp; and
  - Year 2008 and newer construction equipment for engines rated equal to or greater than 50 hp but less than 100 hp.

The requirement to use such equipment shall be stated on all grading plans. The construction contractor shall maintain a list of all operating equipment in use on the Project Site. The construction equipment list shall state the makes, models, and numbers of construction equipment on-site.

- Water exposed soils at least three times daily and maintain equipment and vehicle engines in good condition and in proper tune.
- Wash off trucks leaving the site.
- Replace ground cover on construction sites when it is determined that the site will be undisturbed for lengthy periods.
- Reduce speeds on unpaved roads to less than 15 miles per hour.
- Halt all grading and excavation operations when wind speeds exceed 25 miles per hour.
- Suspend all emission generating activities during smog alerts.
- Use propane- or butane-powered on-site mobile equipment instead of diesel/gasoline, whenever feasible.
- Properly maintain diesel-powered on-site mobile equipment.
- Prohibit nonessential idling of construction equipment to five minutes or less in compliance with California Air Resources Board's Rule 2449.
- Sweep streets with SCAQMD Rule 1186 compliant PM10-efficient vacuum units at the end of the day if substantial visible soil material is carried over to the adjacent streets.
- Use electricity from power poles rather than temporary on-site diesel- or gasoline-powered generators, whenever feasible.
- Use of low-VOC asphalt.
- Maintain a minimum 24-inch freeboard on trucks hauling dirt, sand, soil, or other loose materials and tarp materials with a fabric cover or other suitable means.
- Provide temporary traffic controls (e.g., flag persons) during all phases of construction to ensure minimum disruption of traffic.
- Schedule construction activities that affect traffic flow on adjoining streets to off-peak hours to the extent possible.
- Reroute construction trucks away from congested streets, whenever feasible.
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site, whenever feasible.
- Use coatings and solvents with a volatile organic compound (VOC) content lower than required under SCAQMD Rule 1113 (i.e., Super Compliant Paints). All architectural coatings shall be applied either by (1) using a high-volume, low-pressure spray method operated at an air pressure between 0.1 and 10 pounds per square inch gauge to achieve a 65 percent application efficiency; or (2) manual

application using a paintbrush, hand-roller, trowel, spatula, dauber, rag, or sponge, to achieve a 100 percent applicant efficiency. The construction contractor shall also use precoated/natural colored building, where feasible. Use of low-VOC paints and spray method shall be included as a note on architectural building plans.

## **Operational Phase**

**AQ-3** Prior to the issuance of building permits for any future development, the applicant shall submit, and Director of Community Development shall have approved, an operation-emissions mitigation plan. The plan shall identify implementation procedures for each of the following emissions reduction measures and all feasible mitigation measures shall be implemented. If certain measures are determined infeasible, an explanation thereof shall be provided.

- Utilize built-in energy-efficient appliances to reduce energy consumption and emissions.
- Utilize energy-efficient and automated controls for air conditioners and lighting to reduce electricity consumption and associated emissions.
- Install special sunlight-filtering window coatings or double-paned windows to reduce thermal loss, whenever feasible.
- Utilize light-colored roofing materials as opposed to dark roofing materials to conserve electrical energy for air-conditioning.
- Provide shade trees in residential subdivisions as well as public areas, including parks, to reduce building heating and cooling needs, whenever feasible.
- Ensure that whenever feasible, commercial truck traffic is diverted from local roadways to off-peak periods.
- Centralize space heating and cooling for multiple-family dwelling units and commercial space.
- Orient buildings north/south for reducing energy-related combustion emissions.
- Use solar energy, when feasible.
- Use high rating insulation in walls and ceilings.

**AQ-4** Prior to the issuance of building permits, future sales information on available housing and employment opportunities within the project area shall be provided to employees and residents of the project area, so as to encourage employees to live within the residential developments planned on-site and future residents to find employment nearby.

**AQ-5** Prior to the issuance of building permits, the applicant shall demonstrate to the satisfaction of the Director of Community Development that future employment generating nonresidential development shall include measures to reduce vehicle trips

including: the promotion of carpool incentives and alternative work schedules, easy access to public transit systems, trail linkages between uses, low emissions vehicles fleets, and the provision of on-site facilities such as banking and food courts, and bicycle parking facilities, and other transportation demand management measures, as deemed appropriate.

Additionally, the Certified EIR identified PPPs that will help reduce or avoid potential air quality impacts. The following PPPs are applicable and would be incorporated into the Proposed Project.

- PPP 3-1**    **SCAQMD Rule 201 – Permit to Construct:** The SCAQMD requires developers who build, install, or replace any equipment or agricultural permit unit, which may cause new emissions of or reduce, eliminate, or control emissions of air contaminants to obtain a permit to construct from the Executive Officer.
- PPP 3-2**    **SCAQMD Rule 402 – Nuisance Odors:** The SCAQMD prohibits the discharge of any quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health or safety of any such persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property to be emitted within the SoCAB.
- PPP 3-3**    **SCAQMD Rule 403 – Fugitive Dust (PM10 and PM2.5):** The SCAQMD prohibits any person to cause or allow the emissions of fugitive dust from any active operation, open storage pile, or disturbed surface area such that: (a) the dust remains visible in the atmosphere beyond the property line of the emission source; or (b) the dust emission exceeds 20 percent opacity (as determined by the appropriate test method included in the Rule 403 Implementation Handbook) if the dust emission is the result of movement of a motorized vehicle.
- PPP 3-4**    **SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities:** This rule specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM). All operators are required to maintain records, including waste shipment records, and are required to use appropriate warning labels, signs, and markings.
- PPP 3-5**    **SCAQMD Rule 445 – Wood-Burning Devices:** SCAQMD prohibits installation of wood-burning devices such as fireplaces and wood-burning stoves in new development unless the development is located at an elevation above 3,000 feet or if existing infrastructure for natural gas service is not available within 150-feet of the development. All

fireplaces installed within the Proposed Project Site will be natural gas fueled fireplaces.

The following PDFs are also applicable to the Proposed Project and will help reduce or avoid its potential air quality impacts.

- PDF 4-1 Compact/Mixed-Use Development:** The California Energy Commission (CEC) considers compact development forms beneficial for minimizing energy consumption that leads to greenhouse gas emissions. In fact, the CEC’s report on the connections between land use and climate change identifies density as the project feature most predictive of the number of vehicle trips and vehicle miles traveled (“VMT”) by project occupants. Like the 2011 Approved Project, the 2012 Modified Project increases the density of development on the Proposed Project Site. Doing so will tend to reduce VMT on a local and regional basis. For the purpose of this analysis, it was assumed that there would be only a 25% reduction in VMT, which is within the range observed in Southern California.
- PDF 4-2 High Rate of Internal Trip Capture:** With the inclusion of a mix of land uses including office, commercial, industrial, and residential in the Proposed Project Site, the 2012 Modified Project significantly reduces trips outside the Proposed Project Site. This reduces trip length and congestion on the local circulation system outside the Proposed Project Site.
- PDF 4-7 Energy Star Appliances:** EnergyStar appliances (excluding refrigerators), such as dishwashers, clothes washers, clothes dryers, air conditions, furnaces, and water heaters, shall be offered or installed in all residential dwelling units.
- PDF 4-8 Building Energy Efficiency:** Residential dwellings and non-residential buildings will be constructed so that they achieve 15 percent higher energy efficiency than the applicable standards set forth in the 2008 California Building and Energy Efficiency Standards (Title 24, Part 6 of the California Building Code) or meet the standards in effect at the time of issuance of building permit. The Energy Commission’s 2013 Building Energy Efficiency Standards are 25 percent more efficient than the 2008 standards for residential construction and 30 percent more efficient for nonresidential construction. The 2013 Energy Efficiency Standards, which take effect on January 1, 2014, offer builders more efficient windows, insulation, lighting, ventilation systems and other options that would reduce energy consumption in homes and businesses.
- PDF 4-9 Carbon Sequestration:** The 2012 Modified Project incorporates landscaping and a plant palette that will foster carbon sequestration within the Proposed Project Site that is



comparable to the landscaping and plant palette that was already incorporated into the 2011 Approved Project.

### **3.3 Greenhouse Gas Emissions**

#### **3.3.1 Summary of Certified EIR Findings**

The Certified EIR reported estimated greenhouse gas (GHG) emissions associated with the project related to construction (one-time emissions associated with construction equipment during demolition, site preparation, grading, and building; construction-related vehicle trips; and off-gas emissions from painting and paving), changes in vegetation (new trees planted on the Project Site), area sources (landscape maintenance), building energy use, water supply, solid waste, and mobile sources. A target efficiency threshold of 4.8 metric tons of CO<sub>2</sub>e per service population per year was established to analyze the potential impacts of the project. The total operational and construction GHG emissions were quantified to 4.47 metric tons of CO<sub>2</sub>e per service population per year. Because the estimated GHG emissions would not exceed the efficiency threshold and because the project was determined to be consistent with federal and statewide GHG emissions reduction measures (e.g., Assembly Bill 32), impacts were concluded to be less than significant.

#### **3.3.2 Impacts of Proposed Project**

Similar to the air quality analysis above, GHG emissions associated with the Baseline (Approved) Project and the Proposed Project have been calculated using CalEEMod®, version 2016.3.2 to maintain methodological consistency with the Certified EIR and allow a like for like comparison, as described above and in Appendix C. However, a newer version of the model, CalEEMod® 2022.1.1 is now available. Therefore, a sensitivity analysis was also conducted to evaluate the AQ and GHG impacts of the Proposed Project operation relative to the Baseline (Approved) Project using CalEEMod® 2022.1.1.

When comparing the Proposed Project emissions to the SSEIR emissions, the Certified EIR did not identify any significant impacts related to GHGs. Table 2 (Table 8, Appendix C) presents a comparison of the annual GHG emissions associated with the Proposed Project to those reported in the Certified EIR for the Baseline (Approved) Project. As shown in the table, the total annual GHG emissions associated with the Proposed Project are slightly lower than that for the Baseline (Approved) Project reported in the Certified EIR. Additionally, the GHG efficiency metric of 4.0 MT CO<sub>2</sub>e/year/service population for the Proposed Project is lower than the GHG efficiency metric for the Baseline (Approved) Project. Therefore, the Proposed Project would not cause a new significant GHG impact compared to those previously reported in the Certified EIR for the Baseline (Approved) Project.

**Table 2. Summary of Annual Greenhouse Gas Emissions**

Sources	CO <sub>2</sub> e Emissions (MT/year)	
	Baseline (Approved) Project	Proposed Project
Area Source	1,989	2,090
Energy Use	36,046	32,252
Mobile Source	97,312	98,815
Solid Waste	6,170	7,578
Water Use	6,926	4,680
<b>Total</b>	<b>148,444</b>	<b>145,415</b>
Service Population	37,890	40,249
Emissions per Service Population	3.92	3.61
Construction Amortized	3,168	3,384
Vegetation Amortized	-952	-952
<b>Total</b>	<b>150,659</b>	<b>147,847</b>
Emissions per Service Population	4.0	3.7

With regards to the Property Exchange, no change in the allowable uses or intensity of development within Districts would occur beyond that analyzed for purposes of the Zone Change and discussed above. The Proposed Project would allow for up to 1,300 additional dwelling units to be built by converting up to 755,552 square feet of the previously approved and vested non-residential entitlements to new residential uses. As noted above, these slight differences in land uses would not generate any new significant impacts or substantial increases in severity as compared to the Baseline (Approved) Project, or the results of the analysis for the Proposed Project. Therefore, in accordance with Section 15162 of the CEQA Guidelines, the Proposed Project would not result in an increase in the severity of any previously identified significant impacts compared to the Baseline (Approved) Project; no major revisions to the Certified EIR are required.

### **3.3.3 PPPs, PDFs, and MMs Applicable to the Proposed Project**

The Certified EIR identified no significant GHG impacts, and no mitigation measures were included. However, the following PPPs and PDFs would help reduce and avoid potential impacts related to GHG emissions.

#### **3.3.3.1 Citywide Construction Strategies**

**PPP 4-1 City of Irvine Construction and Demolition (“C&D”) Debris Recycling and Reuse Ordinance:** The C&D ordinance requires that 1) all residential projects of more than one unit, 2) nonresidential developments on 5,000 square feet or larger, and 3) nonresidential demolition/renovations with more than 10,000 square feet of building, recycle or reuse a minimum of 75 percent of concrete and asphalt and 50 percent of nonhazardous debris generated.

#### **3.3.3.2 Regional Operational Strategies**

**PPP 4-2 SCAQMD Rule 445 – Wood-Burning Devices:** SCAQMD prohibits installation of wood-burning devices such as fireplaces and wood-burning stoves in new development unless the development is located at an elevation above 3,000 feet or if existing infrastructure for natural gas service is not available within 150-feet of the development. All fireplaces installed within the Proposed Project Site will be natural gas fueled fireplaces.

#### **3.3.3.3 Statewide and Federal Operational Strategies**

**PPP 4-3 Building and Energy Efficiency Standards (CCR Title 24):** Prior to the issuance of a building permit for residential, commercial, or office structures in the Proposed Project Site, development plans for these structures shall be required to demonstrate that the project meets the 2008 Building and Energy Efficiency Standards. Commonly known as Title 24, these standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The 2008 standards are approximately 15 percent more energy efficient than the 2005 Building and Energy Efficiency Standards. Plans submitted for building permits shall include written notes demonstrating compliance with the 2008 energy standards and shall be reviewed and approved by the Public Utilities Department prior to issuance of building permits. Design strategies to meet this standard may include maximizing solar orientation for daylighting and passive heating/cooling, installing appropriate shading devices and landscaping, utilizing natural ventilation, and installing cool roofs. Other techniques include installing insulation (high R value) and radiant heat barriers, low-e window glazing, or double-paned windows.

- PPP 4-4 Title 24 Code Cycles: Net-Zero Buildings (Residential & Non-Residential):** The California Public Utilities Commission adopted its Long-Term Energy Efficiency Strategic Plan on September 18, 2008, presenting a roadmap for all new residential and commercial construction to achieve a zero-net energy standard. This Plan outlines the goal of reaching zero net energy in residential construction by 2020 and in commercial construction by 2030. Achieving this goal will require increased stringency in each code cycle of California’s Energy Code (Title 24).
- PPP 4-5 California Renewable Portfolio Standard:** CARB’s Renewable Portfolio Standard (RPS) is a foundational element of the State’s emissions reduction plan. In 2002, Senate Bill 1078 established the California RPS program, requiring 20 percent renewable energy by 2017. In 2006, Senate Bill 107 advanced the 20 percent deadline to 2010, a goal which was expanded to 33 percent by 2020 in the 2005 Energy Action Plan II. On September 15, 2009, Governor Arnold Schwarzenegger signed Executive Order S-21-09 directing CARB to adopt regulations increasing RPS to 33 percent by 2020. These mandates apply directly to investor-owned utilities, which in the case of the 2012 Modified Project is Southern California Edison (“SCE”).
- PPP 4-6 California Low Carbon Fuel Standard:** On January 18, 2007, Governor Arnold Schwarzenegger issued Executive Order S-1-07 requiring the establishment of a Low Carbon Fuel Standard (“LCFS”) for transportation fuels. This statewide goal requires that California’s transportation fuels reduce their carbon intensity by at least 10 percent by 2020. Regulatory proceedings and implementation of the LCFS have been directed to CARB. The LCFS has been identified by CARB as a discrete early action item in the Scoping Plan. CARB expects the LCFS to achieve the minimum 10 percent reduction goal; however, many of the early action items outlined in the Scoping Plan work in tandem with one another. To avoid the potential for double-counting emission reductions associated with AB 1493 (Pavley), the Scoping Plan has modified the aggregate reduction expected from the LCFS to 9.1 percent.
- PPP 4-7 Federal Corporate Average Fuel Economy (“CAFE”) Standards:** The 2007 Energy Bill creates new federal requirements for increases in fleetwide fuel economy for passenger vehicles and light trucks. The federal legislation requires a fleetwide average of 35 miles per gallon (mpg) to be achieved by 2020. The National Highway Traffic Safety Administration is directed to phase in requirements to achieve this goal. Analysis by CARB suggests that this will require an annual improvement of approximately 3.4 percent between 2008 and 2020.
- PPP 4-8 California Assembly Bill 1493 – Pavley Standards:** On July 22, 2002, Governor Gray Davis signed Assembly Bill 1493 requiring CARB to develop and adopt regulations

designed to reduce greenhouse gases emitted by passenger vehicles and light-duty trucks beginning with the 2009 model year. The standards set within the Pavley regulations are expected to reduce GHG emissions from California passenger vehicles by about 22 percent in 2012 and about 30 percent in 2016. California had petitioned the USEPA in December 2005 to allow these more stringent standards and California executive agencies have repeated their commitment to higher mileage standards. On July 1, 2009, the USEPA granted California a waiver that will enable the state to enforce stricter tailpipe emissions on new motor vehicles.

**PPP 4-9 SB 375:** SB 375 requires the reduction of GHG emissions from light trucks and automobiles through land use and transportation efforts that will reduce vehicle miles traveled (“VMT”). In essence, SB 375’s goal is to control GHGs by curbing urban sprawl and through better land use planning. SB 375 essentially becomes the land use contribution to the GHG reduction requirements of AB 32, California’s global warming bill enacted in 2006. The Modified Project is consistent with SB 375 strategies to reduce VMT and associated GHG emissions in that it represents a compact, mixed-use development, improves the jobs/housing balance in the city of Irvine and the Orange County Council of Governments Subregion, and provides access to mass transit. According to SCAG’s 2008 Regional Comprehensive Plan, SCAG’s Land Use and Housing Action Plan can be expected to result in a 10 percent reduction in VMT in 2035 when compared to current trends.

#### **3.3.3.4 Citywide Operational Strategies**

**PPP 4-11 Comprehensive Signal Retiming and Coordination Program:** Emissions are highest at the lowest travel speeds. The City is currently retiming and coordinating signals throughout Irvine under its ITEMS (Irvine Traffic Engineering System) program. A program to retime and coordinate traffic signals would produce more even traffic flows, so that vehicles are not starting and stopping constantly. These types of programs can improve vehicular level of service (“LOS”), thereby decreasing emissions for the same volume of vehicles.

**PPP 4-12 Waste Reduction:** The City adopted a Zero Waste program in 2007 to approach waste management. The City recovers approximately 66 percent of its waste for recycling and composting, which exceeds the state’s AB 939 waste diversion goals. Furthermore, waste haulers establish rate schedules according to bin size and frequency of collection. Commercial customers that subscribe to smaller bins (e.g., 2 cubic-yard bins) are routinely charged less by haulers. This pricing structure encourages waste reduction and recycling, and tends to minimize hauler pickups.

### 3.3.3.5 Project Design Features

The following PDFs apply to the Proposed Project to help to reduce and avoid potential impacts related to GHG emissions.

- PDF 4-1 Compact/Mixed-Use Development:** The California Energy Commission (“CEC”) considers compact development forms beneficial for minimizing energy consumption that leads to greenhouse gas emissions. In fact, the CEC’s report on the connections between land use and climate change identifies density as the project feature most predictive of the number of vehicle trips and vehicle miles traveled (“VMT”) by project occupants. The 2012 Modified Project intensified the residential development on the Proposed Project Site as compared to the 2011 Approved Project, and locates additional housing opportunities near major employment and transportation centers. Doing so will tend to reduce VMT on a local and regional basis.
- PDF 4-2 High Rate of Internal Trip Capture:** With the inclusion of a mix of land uses including office, commercial, industrial, and residential in the Proposed Project Site, the 2012 Modified Project significantly reduces trips outside the Proposed Project Site. This reduces trip length and congestion on the local circulation system outside the Proposed Project Site.
- PDF 4-3 Low-Flow Fixtures:** The 2012 Modified Project incorporates low-flow water fixtures that will meet the requirements of the California Green Building Standards Code standards. Prior to issuance of building permit, the Applicant or its successor shall submit evidence to the satisfaction of the Director of Community Development that toilets, urinals, sinks, showers, and other water fixtures installed on-site are low-flow water fixtures that meet the California Green Building Standards Code standards.
- PDF 4-4 Landscaping and Irrigation Systems:** The 2012 Modified Project incorporates automated, high-efficiency landscaping irrigation systems on all master landscaped areas that reduce water use, such as evapotranspiration “smart” weather-based irrigation controllers, and bubbler irrigation; low-angle, low-flow spray heads; moisture sensors; and use of a California-friendly landscape palette. Prior to approval of landscape plans, the Applicant or its successor shall submit evidence to the satisfaction of the City’s Director of Community Development that such landscaping irrigation systems will be installed so as to make the 2012 Modified Project consistent with the intent of the California Water Conservation in Landscaping Act of 2006 (“AB 1881”), including provisions to reduce the wasteful, uneconomic, inefficient, and unnecessary consumption of water.

- PDF 4-5 Use of Reclaimed Water on All Master Landscaped Areas:** Prior to approval of landscape plans, the Applicant or its successor shall submit evidence to the satisfaction of the City’s Director of Community Development and the Irvine Ranch Water District (“IRWD”) that the landscape plans incorporate the use of reclaimed water in all master landscaped areas, including master landscaped commercial, multifamily, common, roadways, and park areas. Master landscapes shall also incorporate weather-based controllers and efficient irrigation system designs to reduce overwatering, combined with the application of a California-friendly landscape palette.
- PDF 4-6 Material Recovery:** The 2012 Modified Project incorporates measures to reduce waste generated by Proposed Project Site residents, occupants and visitors, and to encourage recycling of solid wastes, utilizing the Orange County Integrated Waste Management Department’s material recovery facilities to recycle glass, plastic, cans, junk mail, paper, cardboard, greenwaste (e.g., grass, weeds, leaves, branches, yard trimmings, and scrap wood), and scrap metal. Future employees, residents, and customers would participate in these programs. These measures include the requirement to include on-site recycling facilities at all commercial, retail, industrial, and multi-family residential developments. In addition, educational materials identifying available recycling programs shall be distributed to all land uses, including single-family residential.
- PDF 4-7 Energy Star Appliances:** EnergyStar appliances (excluding refrigerators), such as dishwashers, clothes washers, clothes dryers, air conditions, furnaces, and water heaters, shall be offered or installed in all residential dwelling units.
- PDF 4-8 Building Energy Efficiency:** Residential dwellings and non-residential buildings will be constructed so that they achieve 15 percent higher energy efficiency than the applicable standards set forth in the 2008 California Building and Energy Efficiency Standards (Title 24, Part 6 of the California Building Code) or meet the standards in effect at the time of issuance of building permit. The Energy Commission’s 2013 Building Energy Efficiency Standards are 25 percent more efficient than the 2008 standards for residential construction and 30 percent more efficient for nonresidential construction. The 2013 Energy Efficiency Standards, which take effect on January 1, 2014, offer builders more efficient windows, insulation, lighting, ventilation systems and other options that would reduce energy consumption in homes and businesses.
- PDF 4-9 Carbon Sequestration:** The 2012 Modified Project incorporates landscaping and a plant palate that will foster carbon sequestration within the Proposed Project Site that is comparable to the landscaping and plant palate that was already incorporated into the 2011 Approved Project.

**PDF 4-10 Softscape Landscaped Areas:** Consistent with the sustainable practices and modern landscaping standards, and consistent with the landscaping used in the 2011 Approved Project, the 2012 Modified Project reduces softscape (e.g., plants/horticultural elements of landscape design) landscaped areas by 28 percent as compared to the default assumption in CalEEMod.

## **3.4 Noise**

### **3.4.1 Summary of Certified EIR Findings**

The Certified EIR discussed potential noise impacts associated with development of PA 51 and concluded that impacts would be reduced to less than significant with the incorporation of mitigation measures. The Certified EIR concluded that impacts related to groundborne vibration and noise levels and impacts related to public and private airports would not occur because groundborne vibrations from construction activities did not include blasting or pile driving and because PA 51 is not within 2 miles of any airport.

The noise assessment in the Certified EIR considered mobile (e.g., traffic) and stationary (e.g., activities associated with commercial and retail uses) noise level increases during construction and operation associated with implementation of the Proposed Project. The Certified EIR determined that the Modified Project as analyzed in the 2012 SSEIR and all subsequent Addenda would not substantially elevate noise levels above local noise standards at noise-sensitive receptors compared to the 2011 Approved Project. The mobile noise analysis considered roadway noises along 395 segments in the surrounding areas, and the stationary noise analysis considered noises associated with the loading and unloading of trucks, trash compactors, and rooftop air-conditioning systems. Construction noises associated with demolition, site preparation, grading, paving, and building construction and coating were also considered. Mitigation from the 2011 SEIR was included to require final noise studies to demonstrate that noise requirements are met (Mitigation Measure N-1) and that residential units with balconies meet the City's exterior noise standards (Mitigation Measure N-2). The Certified EIR also indicated that with implementation of PPPs and PDFs, the project's construction noise impacts on off-site noise-sensitive receptors would be less than significant.

### **3.4.2 Impacts of Proposed Project**

Urban Crossroads has prepared a technical evaluation (see Appendix D) of the potential noise impacts associated with the potential conversion of non-residential land uses to 1,300 condominium units.

The Certified EIR adequately considered the construction, vibration and on-site operational noise impacts and identified several plans, programs, policies and project design features to help avoid potential impacts. While the Proposed Project would result in minor refinements to the land uses



compared to the Baseline (Approved) Project, the overall type of development remains consistent with the allowable land uses previously analyzed in the Certified EIR and the proposed conversion of non-residential uses to 1,300 condominium units will not change the analysis or conclusions in the Certified EIR. Additionally, the plans, programs, policies and project design features identified above will remain in place. Therefore, the construction, vibration and on-site operational noise impacts of the Proposed Project are expected to remain consistent with the analysis in the Certified EIR and are not further addressed in this technical memo. In addition, this analysis recognizes that the impacts of the environment on a Project are excluded from CEQA unless the project itself “exacerbates” such impacts. As such, any impact on the future noise receivers of the Project is not an impact under CEQA. *CBLA v. BAAQMD* (2015) 62 Cal.4th 369, 386 and *Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal.App.4th 455, 473

Traffic generated by the operation of the proposed Project will influence the traffic noise levels in the surrounding off-site areas and at the Project site consistent with the Project 2012 Noise Study. However, according to the 2025 Addendum #16 Trip Generation Assessment, the potential conversion of non-residential land uses to 1,300 condominium units is anticipated to generate 3,528 fewer two-way trips per day as compared to the Project 2012 Traffic Study. Based on a comparison to the Project 2012 Noise Study, the 2025 Addendum #16 is anticipated to result in a net reduction in trips.

Therefore, since the 2025 Addendum #16 represents a net reduction in trips, the off-site traffic noise levels generated by the 2025 Addendum #16 are considered less than significant and no further analysis is required. Therefore, the Proposed Project would not cause a new significant noise impact compared to those impacts previously reported in the Certified EIR for the Baseline (Approved) Project.

With regards to the Property Exchange, no change in the allowable uses or intensity of development within Districts would occur beyond that analyzed for purposes of the Zone Change and discussed above. Additionally, the Proposed Project would allow for up to 1,300 additional dwelling units to be built by converting up to 755,552 square feet of the previously approved and vested non-residential entitlements to new residential uses. As noted above, these slight differences in land uses would not generate any new significant impacts or substantial increases in severity as compared to the Baseline (Approved) Project, or the results of the analysis for the Proposed Project. Therefore, in accordance with Section 15162 of the CEQA Guidelines, the Proposed Project would not result in an increase in the severity of any previously identified significant impacts compared to the Baseline (Approved) Project; no major revisions to the Certified EIR are required.

### 3.4.3 PPPs, PDFs, and MMs Applicable to the Proposed Project

The Certified EIR identified Mitigation Measure N-1, which, if implemented, would reduce the effects of the project to a less-than-significant level. These measures are applicable to future development under the Proposed Project and are listed below.

**N-1** Prior to the issuance of building permits for lots facing or located near major highways such as Irvine Boulevard, the project applicant or its successor shall provide a final noise study to the Director of Community Development that demonstrates how the exterior and interior noise requirements (65 dBA CNEL and 45 dBA CNEL, respectively) of the City of Irvine General Plan Noise Element will be met. To attain the exterior and interior noise requirements, the final noise study shall include, but not be limited to the following measures, in addition to such measures as the final noise study determines are required and shall be shown on the final map:

#### **Exterior**

- Provide a minimum six-foot high noise barrier for single-family detached residences shown in Figures 5.7-3 through 5.7-7 of the DSEIR.

#### **Interior**

- Provide a “windows closed” condition, requiring a means of mechanical ventilation (e.g., air conditioning) for all units.
- Provide standard and upgraded dual-glazed windows with a minimum Sound Transmission Coefficient rating of 26. Specific window recommendations shall be made once final architectural plans are available and detailed interior noise reduction calculations can be calculated based on actual building assembly details.

Additionally, the Certified EIR identified a PPP that would help reduce or avoid potential noise impacts. The following PPP is applicable and would be incorporated into the Proposed Project.

**PPP 8-1** Title 6 (Public Works), Division 8 (Pollution), Chapter 2 (Noise) of the Irvine Municipal Code, also known as the City’s Noise Ordinance, outlines the regulations necessary to control unnecessary, excessive and annoying noise in the City. The provisions of this chapter are applicable to nontransportation-related stationary noise sources. It outlines the noise level measurement criteria; establishes the noise zones and the maximum permitted exterior and interior noise standards in each zone; and discloses special noise provisions for construction, truck delivery and maintenance activities. For example, as outlined in Section 6-8-205 of the Noise Ordinance, no construction shall be permitted outside of the hours of 7:00 AM to 7:00 PM Monday through Friday and 9:00 AM to 6:00 PM Saturdays, unless a temporary waiver is granted by the Chief Building Official or authorized representative. Trucks, vehicles,

and equipment that are making, or are involved with, material deliveries, loading, or transfer of materials, equipment service, maintenance of any devices or appurtenances for or within any construction project in the City shall not be operated or driven on City streets outside of these hours or on Sundays and federal holidays unless a temporary waiver is granted by the City. Any waiver granted shall take impact upon the community into consideration. No construction activity will be permitted outside of these hours except in emergencies including maintenance work on the City rights-of-way that might be required.

**PPP 8-2** Prior to the issuance of building permits for each structure or tenant improvement, other than a parking structure, the applicant shall submit a final acoustical report prepared to the satisfaction of the Director of Community Development. The report shall demonstrate that the development will be sound attenuated against present and projected noise levels including stationary, roadway, aircraft, helicopter, and railroad noise to meet City interior and exterior noise standards. The final acoustical report shall include all information required by the City's Acoustical Report Information Sheet (Form 42-48). The report shall be accompanied by a list identifying the sheet(s) of the building plans that include required sound attenuation measures (Standard Condition 3.5).

**PPP 8-3** Title 5 (Planning), Division 10 (Grading Code and Encroachment Regulations), Chapter 1 (Grading Code), Section 5-10-127.G (Import and Export of Earth Materials) of the Irvine Municipal Code, states that if a grading project includes the movement of earth material to or from the site in an amount considered substantial by the Chief Building Official, the permittee is required to submit the proposed haul route for review and approval by the Chief Building Official. Special conditions of the grading permit may be imposed that require alternate routes or other measures in consideration of the possible impact on the adjacent community environment or effect on the public right-of-way itself.

The following PDFs have been incorporated into the Proposed Project to help to reduce or avoid its potential noise impacts.

**PDF 8-1** Construction Noise: Prior to issuance of grading permits, the project applicant or its successor shall incorporate the following measures as a note on the grading plan cover sheet to ensure that the greatest distance between noise sources and sensitive receptors during construction activities has been achieved, and that construction noise has been reduced.

- During construction activities, all construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers, consistent with

manufacturers' standards. All stationary construction equipment shall be placed so that emitted noise is directed away from the noise-sensitive receptors nearest the Proposed Project Site boundaries.

- Equipment shall be staged in areas that will create the greatest distance between construction-related noise sources and the noise-sensitive receptors nearest the Proposed Project Site during all project construction.
- All construction-related activities shall be restricted to the construction hours outlined in the City's Noise Ordinance (Municipal Code Section 6-8-205).
- Haul truck and other construction-related trucks traveling to and from the Proposed Project Site shall be restricted to the same hours specified for the operation of construction equipment. To the extent feasible, haul routes shall not pass directly by sensitive land uses or residential dwellings.
- Where construction will occur adjacent to any developed/occupied noise-sensitive uses, a construction-related noise mitigation plan shall be submitted the Director of Community Development for review and approval prior to the issuance of grading permits. The plan must depict the location of construction equipment and how the noise from this equipment will be mitigated during construction of the 2012 Modified Project, through the use of such methods as: (1) temporary noise attenuation fences; (2) preferential location of equipment; and (3) use of current technology and noise-suppression equipment.
- Construction of planned sound walls that have been incorporated into the project design shall be installed prior to construction of the building foundation; or temporary sound blankets (fences typically composed of poly-vinyl-chloride-coated outer shells with absorbent inner insulation) shall be placed along the boundary of the Proposed Project Site facing the nearest noise-sensitive receptors during construction activities.

## **3.5 Transportation**

### **3.5.1 Summary of Certified EIR Findings**

The Certified EIR concluded that all intersections and roadway/freeway/tollway/ramp segments would operate at acceptable LOS with the existing or planned improvements. If the improvements were not implemented by the agencies with the responsibility to do so, traffic impacts would remain significant and unmitigated. However, since the primary responsibility for approving and/or completing certain improvements outside of the city limits lie with agencies other than the City (i.e., such as the California Department of Transportation), there is the potential that significant impacts may not be fully mitigated if such improvements are not completed for reasons beyond the City's control. Should that occur, traffic impacts would be significant and unavoidable.

### **3.5.2 Impacts of Proposed Project**

Urban Crossroads has prepared a Traffic Evaluation (see Appendix E of this Addendum) of the potential trip generation changes and changes to levels of service (LOS), if any, that would be caused by the proposed conversion of non-residential square footage to residential development.

This report analyzed potential traffic changes on the surrounding roadway network with the Proposed Project. Appropriate short term interim year (STIY) improvements and circulation design features have also been evaluated. As shown on Table 4-2 of the Traffic Evaluation, the AM and PM peak hour STIY LOS at the Fairbanks / Astor intersection is projected to be LOS E without and with the Project. The Project change at this intersection is nominal (less than 1%), and is below the Project impact threshold as discussed in Chapter 2.0. At all other traffic evaluation study area locations, the STIY peak hour intersection LOS is acceptable without or with the Project.

Appendix 5.5 of the Traffic Evaluation includes a Land Use Conversion Trip Generation Letter (see Appendix E of this Addendum). As shown in Table 3 of the trip generation letter, non-residential land uses evaluated for Project 2012 generated 5,331 morning peak hour trips, 6,144 evening peak hour trips, and 63,634 daily vehicle trips. As shown in Table 4 of the trip generation letter, non-residential land uses evaluated with maximum non-residential conversion under the Proposed Project would generate 5,331 morning peak hour trips, 5,742 evening peak hour trips, and 60,107 daily vehicle trips. When compared to the Baseline (Approved) Project, the Proposed Project results in a difference of 0 AM peak hour trips and a net decrease of 402 PM peak hour trips and 3,527 daily trips. Since trips would be reduced under the Proposed Project, the Proposed Project would not result in an increase in the severity of any previously identified significant impacts compared to the Baseline (Approved) Project; no major revisions to the Certified EIR are required.

With regards to the Property Exchange, no change in the allowable uses or intensity of development within Districts would occur beyond that analyzed for purposes of the Zone Change and discussed above. Additionally, the Proposed Project would allow for up to 1,300 additional dwelling units to be built by converting up to 755,549 square feet of the previously approved and vested non-residential entitlements to new residential uses. As noted above, these slight differences in land uses would not generate any new significant impacts or substantial increases in severity as compared to the Baseline (Approved) Project, or the results of the analysis for the Proposed Project. Therefore, in accordance with Section 15162 of the CEQA Guidelines, the Proposed Project would not result in an increase in the severity of any previously identified significant impacts compared to the Baseline (Approved) Project; no major revisions to the Certified EIR are required.

### **3.5.3 PPPs, PDFs, and MMs Applicable to the Proposed Project**

The 2012 SSEIR included Mitigation Measures TRAN-1 through TRAN-12 to address potential impacts on transportation and traffic. These measures would also be applicable to the Proposed Project.

**TRAN-1** Prior to the approval of any final map of a subsequent subdivision map (other than a financing and conveyance map) for any land use, excluding single family land uses (single family land use includes single family detached and single family attached projects), parks, schools, daycare, and religious institutions, that allocates building intensity within Planning Areas 51, the landowner or subsequent project applicant shall either (i) apply for annexation of any areas within the final map to the Irvine Spectrum Transportation Management Association (TMA) (“Spectrumotion”) in accordance with Article X of the recorded Declaration of Covenants, Conditions and Restrictions (CC&Rs) for the Irvine Spectrum TMA, including any supplementary or amended CC&Rs, to reduce traffic, air quality and noise impacts or (ii) develop and implement a similar transportation management plan containing the elements and meeting the criteria described below as approved by the Director of Public Works. The transportation management plan shall be implemented via payment of assessment dues to an organization similar to Spectrumotion for all land uses, with the exceptions noted above. While affordable housing units will be included, their assessment fees will be covered by other remaining adjacent land uses. The implementation (payment of assessment dues) for either option described above shall occur prior to issuance of building permit(s):

#### **Transportation Management Plan (TMP)**

The development and implementation of a Transportation Management Plan is an identified mitigation measure to manage transportation access for Planning Areas 30 and 51. This document summarizes the key elements of the TMP.

##### **A. Introduction**

The purpose of this document is to provide an outline for a comprehensive TMP for the Planning Area 51 (“Great Park TMP”). This report is not intended to provide the specific details of the plan, but rather to highlight the key components and provide direction for subsequent detailed planning and implementation activities. When preparation of the TMP is undertaken, all of the agency and stakeholders will be invited to provide input.

The applicant may elect to annex Combined PA 51 into the Irvine Spectrum Transportation Management Association (Spectrumotion). Spectrumotion is a private,

non-profit Transportation Management Association (TMA) formed to reduce traffic congestion in Irvine Spectrum. Spectrumotion promotes, markets, and subsidizes alternatives to solo-commuting and assists the business community in complying with trip reduction related requirements. Membership is mandatory to property owners with deed restrictions requiring participation in the TMA. Membership dues provide the funding for the Association and its programs, which offer a variety of employer and commuter services focused on reducing vehicular trip generation.

In the event that the applicant elects not to annex into Spectrumotion, a TMP similar to that provided by Spectrumotion will be developed and implemented. This document sets forth the components of the TMP should it be necessary.

## B. Transportation Management Plan Framework

The key elements of the Great Park TMP are set forth below:

- New Hire Orientation: Inform newly hired employees of commuting services available to them.
- Public Transportation Pass Sales: Provide a central location for purchase of passes to available transit services (i.e., OCTA buses, Metrolink, Amtrak, etc.).
- Vanpool and Carpool Formation Assistance: Perform all of the administrative work necessary to establish van pools and carpools.
- On-site Promotions: Hold rideshare promotions at work sites and assist in employer assistance promotions.
- Telecommuting/Alternative Work Schedule Consulting: Assist employers in developing and implementing a telecommuting or alternative work schedule program.
- Personalized Commute Consulting: Provide a personalized commute profile to any commuter, which includes carpool match list containing the names of other commuters in the North Irvine Sphere that live and work near each other.
- Website: Maintain a website with all of their program information available.
- Rideshare Promotions: Conduct high visibility rideshare promotions as a means to advertise its services.
- Subsidies: To the extent financially feasible, offer subsidies to assist in the formation of vanpools, the formation of carpools, and to encourage the trying of transit services.
- Public Agency Coordination: Work closely with various public and quasi-public agencies to improve bus and commuter rail service to the Spectrum and North Irvine Sphere areas.

## C. Transportation Management Plan Implementation

As part of the TMP, a process will be established to monitor its effectiveness in reducing peak hour trip generation in the Combined PA 51. Provision shall be made for the Plan to be modified as appropriate to enhance its effectiveness.

- TRAN-2** Following adoption of a land use plan and circulation plan for the Great Park property and before the issuance of any building permits within the base property, the City of Irvine shall request a cooperative study with OCTA and other affected jurisdictions to amend the Orange County Master Plan of Arterial Highways (MPAH). Marine Way, Trabuco Road from the SR-133 toll way to “O” Street (formerly College Road), and Ridge Valley (formerly “Y” Street) should be included on the MPAH.
- TRAN-3** Prior to issuance of the first building permit for dwelling units or non-residential square footage, a Fee Reallocation Study shall be completed to recalculate the NITM Fees reflecting any fair share allocation modifications. The landowner or subsequent property owner shall submit the Fee Reallocation Study under a separate cover to be approved by the Director of Public Works, in consultation with the NITM Advisory Committee.
- TRAN-4** Prior to approval of the last final map for the 2011 Approved Project (or any portion thereof in the event that the final map is approved in multiple phases), the landowner or subsequent property owner shall pay its fair share of the costs of the following mitigation in an amount to be mutually agreed upon between the landowner or subsequent property owner and the City and reflective of the costs of the mitigation at the time of payment:
- 286 Jeffrey Road & Roosevelt: Restripe the existing eastbound approach to provide a shared through/ right turn lane within the existing right-of-way.
  - 361 Bake Parkway & Portola Parkway: Restripe the existing northbound approach to provide a shared through/left lane (which currently exists as a through lane) within the existing right-of-way and modify the existing traffic signal operation for a north/south split phase signal operation. Alternatively, restripe the existing northbound approach to provide dual left turn lanes in combination with a single through lane and single right turn lane within the existing right-of-way, and modify signal operation to include northbound right turn overlap phase.
  - 374 Lake Forest & Portola Parkway (Pending Projects analysis impact): Convert the existing northbound approach from de-facto right-turn to a dedicated right-turn, and modify the existing traffic signal operation to include right turn overlap phase.
- TRAN-5** **(For specific Project-related non-NITM improvements):** In conjunction with the submittal of any tentative tract maps/tentative parcel maps for the Project within Combined PA 51, the landowner or subsequent project applicant shall prepare, subject



to review and approval of the City, the required tentative tract map/tentative parcel map (TTM/TPM) level traffic study per City Resolution No. 03-61. This traffic study will verify whether the intersection locations listed below, which have been identified as impacted in this SSEIR, are projected to be impacted by the subject project of the Interim Year Analysis. For those intersections impacted by subject project of the TTM/TPM traffic study, the tentative tract map/tentative parcel map will be conditioned to construct the necessary improvements that have been identified in the TTM/TPM traffic study. For those intersections listed below, which are not projected to be impacted by the subject project of the TTM/TPM traffic study, and prior to approval of the last final map for the 2012 Modified Project (or any portion thereof in the event that the final map is approved in multiple phases), the land owner or subsequent property owner shall construct, pay fair share of the costs or enter into an agreement with the City to establish the mechanism in which the funds generated by the mitigations shall be provided and utilized by Caltrans, City of Lake Forest, City of Tustin and/or City of Irvine toward implementing the improvements.

- **16. Newport & Irvine** – Modification of signal to provide a northbound right turn overlap phase. (2030, Option 2) Improvement no longer needed if Pending projects are approved.
- **54. Browning & Irvine** – Application of ATMS, subject to approval by City of Tustin. (2030, Options 1 & 2)
- **221. Culver & Bryan** – Addition of a westbound defacto right turn lane. (2030, Option 2) Improvement no longer needed if Pending projects are approved.
- **286. Jeffrey & Roosevelt** – Conversion of the eastbound shared through/right lane into a through lane and addition of a second right turn lane. (Post-2030, Options 1 & 2)
- **290. Jeffrey & Barranca** – Application of PA9C-identified ATMS. (2030. Options 1 & 2)
- **291. Jeffrey & Alton** – Provision of an eastbound standard right-turn lane with right-turn overlap resulting in an ultimate eastbound lane configuration of 2 left-turn lanes, 2 through lanes, and 1 right-turn lane. (Post-2030, Options 1 & 2)
- **303. Sand Canyon & I-5 NB ramp/Marine Way** – Conversion of the northbound defacto right turn lane to a standard right turn lane with right turn overlap signal operation. (2030, Options 1 & 2)
- **306. Sand Canyon & Oak Canyon** - Fair Share contribution towards – conversion of the westbound shared through/right lane to a single through lane and conversion of the westbound right-turn lane into a free-right turn lane, as identified in the PA40/12 GPA/ZC. (2030, Options 1 & 2) Improvement no longer needed if Pending projects are approved.

- **321. Laguna Canyon & Old Laguna Canyon** – Application of ATMS, subject to approval by the Director of Public Works. Alternate improvement is the addition of a fourth northbound through lane. (Post-2030, Options 1 & 2) Improvement no longer needed if Pending projects are approved.
- **366. Bake & Rockfield** – Fully funded LFTM improvement: Conversion of a westbound through lane to a third left turn lane. (2030, Options 1 & 2)

**TRAN-6 (For specific Project-related NITM improvements):** The NITM Program provides a funding mechanism for the coordinated and phased installation of required traffic and transportation improvements established in connection with land use entitlements for City of Irvine Planning Areas 1, 5, 6, 8, 9, 40 and 51. As established by City Ordinance No. 03-20, Combined PA 51 is included in this program and, as such, is required to pay its fair share towards the List of NITM Improvements included within the established NITM Program. The following Project impacted locations are included in the NITM List of Improvements and thus, payment of NITM fees will mitigate the Combined PA 51 project's fair share responsibility towards these improvements:

- **228. Culver & Barranca** – Conversion of the westbound defacto right-turn lane to a through lane. (2030, Options 1 & 2)
- **424. Los Alisos & Rockfield** – Addition of a southbound right turn lane. (2030, Option 1) Improvement no longer needed if Pending projects are approved.
- **I-5 Northbound Off-ramp to Jamboree** – Addition of a second drop lane from the I-5 to the Jamboree off-ramp. (2030, Option 1)

**TRAN-7 (If pending projects are approved, Project-related non-NITM improvements):** In the event that all of the pending (not approved) projects analyzed are approved and in conjunction with the submittal of any tentative tract maps/tentative parcel maps for the Project within Combined PA 51, the landowner or subsequent project applicant shall prepare, subject to review and approval of the City, the required tentative tract map/tentative parcel map (TTM/TPM) level traffic study per City Resolution No. 03-61. This traffic study will verify whether the intersection locations listed below, which have been identified as impacted in this SSEIR, are projected to be impacted by the subject project of the Interim Year Analysis. For those intersections impacted by subject project of the TTM/TPM traffic study, the tentative tract map/tentative parcel map will be conditioned to construct the necessary improvements that have been identified in the TTM/TPM traffic study. For those intersections listed below, which are not projected to be impacted by the subject project of the TTM/TPM traffic study, and prior to approval of the last final map for the 2012 Modified Project (or any portion thereof in the event that the final map is approved in multiple phases), the land owner or subsequent property owner shall construct, pay fair share of the costs or enter into an

agreement with the City to establish the mechanism in which the funds generated by the mitigations shall be provided and utilized by Caltrans, City of Lake Forest, City of Tustin and/or City of Irvine toward implementing the improvements.

- **54. Browning & Irvine** – Application of ATMS, subject to approval by City of Tustin. (2030, Options 1 & 2)
- **286. Jeffrey & Roosevelt** – Conversion of the eastbound shared through/right lane into a through lane and addition of a second right turn lane. (Post-2030, Options 1 & 2)
- **290. Jeffrey & Barranca** – Application of PA9C-identified ATMS.
- **291. Jeffrey & Alton** – Provision of an eastbound standard right-turn lane with right-turn overlap resulting in an ultimate eastbound lane configuration of 2 left-turn lanes, 2 through lanes, and 1 right-turn lane. (2030 & Post-2030, Options 1, Post-2030, Option 2)
- **303. Sand Canyon & I-5 NB ramp/Marine Way** – Conversion of the northbound defacto right turn lane to a standard right turn lane with right turn overlap signal operation. (2030, Options 1 & 2)
- **366. Bake & Rockfield** – Fully funded LFTM improvement: Conversion of a westbound through lane to a third left turn lane. (2030, Options 1 & 2)
- **417. El Toro & Portola** – Fully funded LFTM improvement: Addition of a southbound right turn overlap phase. (2030, Options 1 & 2)

**TRAN-8 (If pending projects are approved, for specific Project-related NITM improvements):** The NITM Program provides a funding mechanism for the coordinated and phased installation of required traffic and transportation improvements established in connection with land use entitlements for City of Irvine Planning Areas 1, 5, 6, 8, 9, 40, and 51. As established by City Ordinance No. 03-20, Combined PA 51 is included in this program and, as such, is required to pay its fair share towards the List of NITM Improvements included within the established NITM Program. In the event that all of the pending (not approved) projects analyzed are approved, the following Project impacted locations are included in the NITM List of Improvements and thus, payment of NITM fees will mitigate the Combined PA 51 project's fair share responsibility towards these improvements:

- **228. Culver & Barranca** – Conversion of the westbound defacto right-turn lane to a through lane. (2030, Options 1 & 2)
- **I-5 NB Off-ramp to Jamboree** – Addition of a second drop lane from the I-5 to the Jamboree off-ramp. (2030 & Post-2030, Option 1 & 2)

**TRAN-9 (Caltrans Fair Share):** Prior to approval of the last final map for the 2012 Modified Project (or any portion thereof in the event that the final map is approved in multiple

phases), the land owner or subsequent property owner shall make a good-faith effort to enter into a fair share agreement with Caltrans and the City of Irvine to establish its fair share allocation towards the future implementation of the following freeway facility improvements. It may not be possible to successfully negotiate the agreement with Caltrans. Fair share contribution shall be calculated using the same methodology for determining fair share contributions as included in the North Irvine Transportation Mitigation Program. The Agreement shall establish the mechanism in which the funds generated by the Project's fair share mitigations shall be provided and utilized by Caltrans and/or City of Irvine toward implementing the following improvements:

- **I-5 Northbound, north of Culver** – Directional capacity enhancement equivalent to a single general-purpose lane. (2030, Options 1 & 2)
- **I-5 Northbound, north of Jeffrey** – Directional capacity enhancement equivalent to a single general-purpose lane. (2030, Options 1 & 2) Improvement no longer needed if Pending projects are approved.
- **I-405 Northbound, north of Jeffrey** – Directional capacity enhancement equivalent to a single general-purpose lane. (2030 and Post-2030, Options 1 & 2) Improvement no longer needed if Pending projects are approved.

**TRAN-10 (If pending projects are approved, Caltrans Fair Share):** In the event that all of the pending (not approved) projects analyzed are approved, and prior to approval of the last final map for the 2012 Modified Project (or any portion thereof in the event that the final map is approved in multiple phases), the land owner or subsequent property owner shall make a good-faith effort to enter into a fair share agreement with Caltrans and the City of Irvine to establish its fair share allocation towards the future implementation of the following freeway facility improvements. It may not be possible to successfully negotiate the agreement with Caltrans. Fair share contribution shall be calculated using the same methodology for determining fair share contributions as included in the North Irvine Transportation Mitigation Program. The Agreement shall establish the mechanism in which the funds generated by the Project's fair share mitigations shall be provided and utilized by Caltrans and/or City of Irvine toward implementing the following improvements:

- **SR-133 northbound loop on-ramp at Barranca Parkway** – Conversion of the HOV preferential lane to a second metered mixed-flow lane (2015, Option 2)
- **I-5 Northbound, north of Culver** – Directional capacity enhancement equivalent to a single general-purpose lane. (2030, Options 1 & 2)

**TRAN-11 (Rockfield MPAH Amendment)** The City of Irvine shall submit a request to OCTA and other affected jurisdictions to amend the Orange County Master Plan of Arterial

Highways (MPAH) to eliminate the extension of Rockfield Boulevard from the eastern project boundary to Marine Way.

**TRAN-12 (If Rockfield MPAH Amendment not approved by OCTA)** In the event that the Rockfield MPAH change does not occur and the Rockfield connection to Marine Way is ultimately constructed, and in addition to previously identified Post-2030 Option 1 improvements, the land owner or subsequent property owner shall enter into a fair share agreement with the City of Irvine and shall make a good-faith effort to enter into a fair share agreement with Caltrans to establish its fair share allocation towards the future implementation of the conversion of the HOV preferential lane at the SR-133 northbound loop on-ramp at Barranca Parkway to a second metered mixed-flow lane. It may not be possible to successfully negotiate the agreement with Caltrans. The fair share contribution shall be calculated using the same methodology for determining fair share contributions as included in the North Irvine Transportation Mitigation Program. The Agreement shall establish the mechanism in which the funds generated by the Project's fair share mitigations shall be provided and utilized by Caltrans and/or City of Irvine. For Option 2, the mitigations as indicated in TRAN5 through TRAN10 remain unchanged in the event that the Rockfield MPAH change does not occur and the Rockfield connection to Marine Way is ultimately constructed.

In addition, the following PDF applies to the Proposed Project to help to reduce and avoid potential impacts related to traffic.

**PDF 12-1** The 2012 Modified Project's optional conversion of non-residential square footage to residential units, if implemented, will be subject to a traffic analysis to assess traffic impacts, if any, due to the specific changes in land use and will include a reduction in allowable Multi-Use intensity in terms of equivalent traffic generation (excluding DB units) based on AM peak, PM peak, and ADT. Conversions to other non-residential uses within the Multi-Use category, if implemented, will also be subject to a traffic analysis to assess traffic impacts, if any, and shall be reflected in terms of equivalent traffic generation based on AM peak, PM peak, and ADT.

### **3.6 CEQA Guidelines Section 15164: Addendum to an EIR Or Negative Declaration**

- 1. The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred. (14 CCR Section 15164(a))**

The Certified EIR for the Proposed Project addressed the potential environmental impacts of constructing up to 10,556 dwelling units and 4,902,200 square feet of nonresidential uses within PA 51. As described throughout this EIR Addendum, some minor technical changes have been

made to the Certified EIR, but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred. Therefore, no subsequent or supplemental EIR is required.

- 2. An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred. (14 CCR Section 15164(b))**

The City of Irvine, lead agency for the Proposed Project, prepared an EIR (Certified EIR) for the project, and an EIR was certified. This section does not apply to the Proposed Project.

- 3. An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration. (14 CCR Section 15164(c))**

This Addendum is not required to be circulated for public review but will be attached to the Certified EIR.

- 4. The decision making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project. (14 CCR Section 15164(d))**

The Lead Agency will consider the EIR Addendum with the Certified EIR prior to approving the Proposed Project.

- 5. A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence. (14 CCR Section 15164(e))**

As discussed in Chapter 3 of this Addendum, the Proposed Project would not meet any of the criteria described under 14 CCR Section 15162. The Proposed Project could be implemented with no new significant impacts or substantially greater impacts as compared to those identified in the Certified EIR. The Proposed Project would not require substantial changes to the Certified EIR and no new mitigation measures have been identified. Therefore, an Addendum to the Certified EIR is appropriate and has been prepared.

## Section 4    **References**

---

Irvine, City of. 2024, August. City of Irvine General Plan.

———. Municipal Code (as amended).

———. Zoning Ordinance (as amended).

———. CEQA Procedures (as amended).

———. Final Program Environmental Impact Report for the Orange County Great Park, SCH No. 2002101020, May 2003.

———. Final Supplemental Environmental Impact Report for the Great Park Neighborhoods, SCH No. 2002101020, August 2011.

———. Final Second Supplemental Environmental Impact Report for the Great Park Neighborhoods, SCH No. 2002101020, November 2013.

Ramboll. 2025, August. Heritage Fields Great Park Neighborhoods Air Quality and Greenhouse Gas Technical Evaluation.

Urban Crossroads. 2025, July. 2025 Addendum #16 Noise Assessment Technical Memorandum.

———. 2025, July. Great Park Neighborhoods VTTMS 19402, 19403, 19404, 19405, 19406 and Master Plan Modification BA 619 Traffic Evaluation.

## Appendices Available on Request