

CITY OF IRVINE INITIAL STUDY AND ENVIRONMENTAL EVALUATION FORM

SECTION I. PROJECT INFORMATION

1. Project Title

Planning Area 52 Project (File Nos. 00956521-PGA, 00956519-PZC, and 00986547-PDA)

2. Lead Agency Name and Address

City of Irvine
One Civic Center Plaza
PO Box 19575
Irvine, CA 92623-9575

3. Contact Person and Phone Number

Eric Martin, Senior Planner
OakPark@cityofirvine.org
(949) 724-7519

4. Project Sponsor's Name and Address

Irvine Company
550 Newport Center Drive
Newport Beach, CA 92660

Attn: Jonathan Bjorndahl, Vice President, Development & Forward Planning
jbjorndahl@irvinecompany.com
(949) 720-5639

5. Project Location

The proposed project involves the creation of a new Planning Area (PA) 52 in the central portion of the City of Irvine, Orange County, California. Proposed PA 52 encompasses approximately 280 acres (referred to herein as the "Project site") and is generally bound by Jeffrey Road to the west, Interstate (I)-5 to the north, Valley Oak and Oak Canyon (streets) and the existing Innovation Office Park to the east, and Irvine Center Drive to the south (refer to Figure 1). The Project site is currently located within PA 12 (Oak Creek). Attachment A of this Initial Study includes a list of assessor parcel numbers (APNs) for the Project site.

6. General Plan Designation: Research/Industrial, Preservation, and Recreation

7. Zoning: 5.4B General Industrial, 5.5H Medical and Science, 1.4 Preservation, and 1.5 Recreation

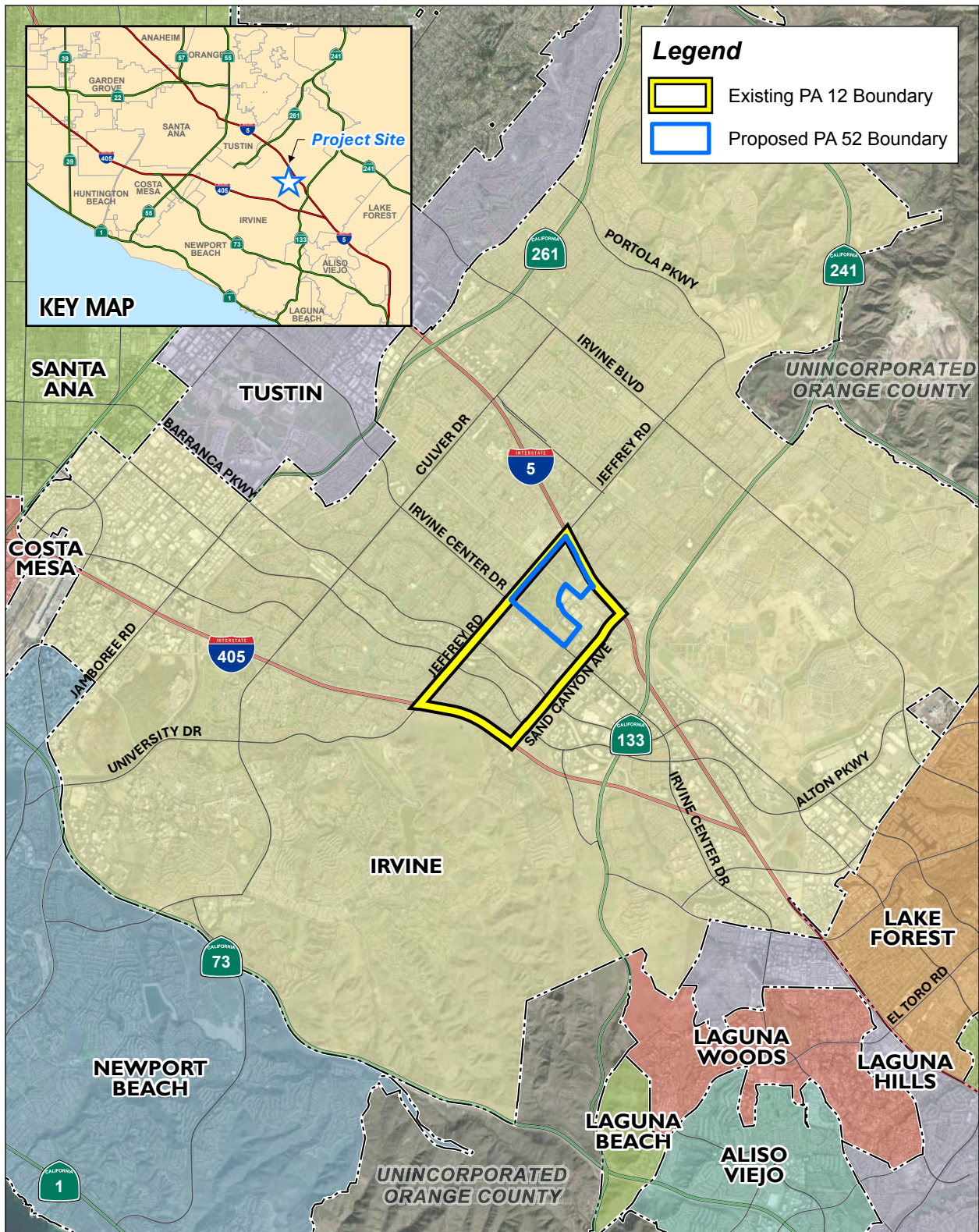
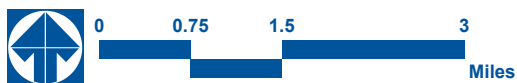


Figure 1



Regional and Local Vicinity Map

8. **Description of Project:** A summary project description is provided below; refer to Section II, Project Description, for additional information about the proposed project (Project) and Project background.

On August 13, 2024, the Irvine City Council approved updates to the City of Irvine 2045 General Plan and Zoning Ordinance (collectively referred to herein as the “approved General Plan and Zoning Ordinance amendments”) to implement the City’s 6th Cycle (2021-2029) Housing Element (Housing Element) and make other changes to General Plan elements to reflect changes to environmental conditions, City goals and policies, and applicable laws and regulations, since the last comprehensive General Plan update in 2000. The approved General Plan and Zoning Ordinance amendments provide for the development of up to 57,656 dwelling units Citywide, with 26,607 residential units within Focus Area 2. Of those Focus Area 2 units, the General Plan Land Use Element identified 4,907 units as being located within a portion of PA 12 (Oak Creek). On August 13, 2024, the City also certified the *2045 General Plan Update Final Program Environmental Impact Report* (GPU EIR) (State Clearinghouse No. 2023070463).¹

The proposed Project includes a General Plan amendment, zone change, and Development Agreement to establish an approximately 280-acre new village (proposed PA 52; Project site) in the City. While the Project site includes all the proposed PA 52 area, the proposed Project does not include development of the entire Project site (refer to Section II.4 for a description of the physical improvement areas). The proposed Project would include a maximum of 2,400 residential units (inclusive of density bonus units), a public nature park and trail system, a Kindergarten through 6th grade (K-6) elementary school site, neighborhood parks, and on- and off-site circulation and utility infrastructure improvements. Additionally, approximately 312 acres of privately-owned open space in PA 1 (Orchard Hills) and PA 6 (Portola Springs) would be dedicated to the City of Irvine.

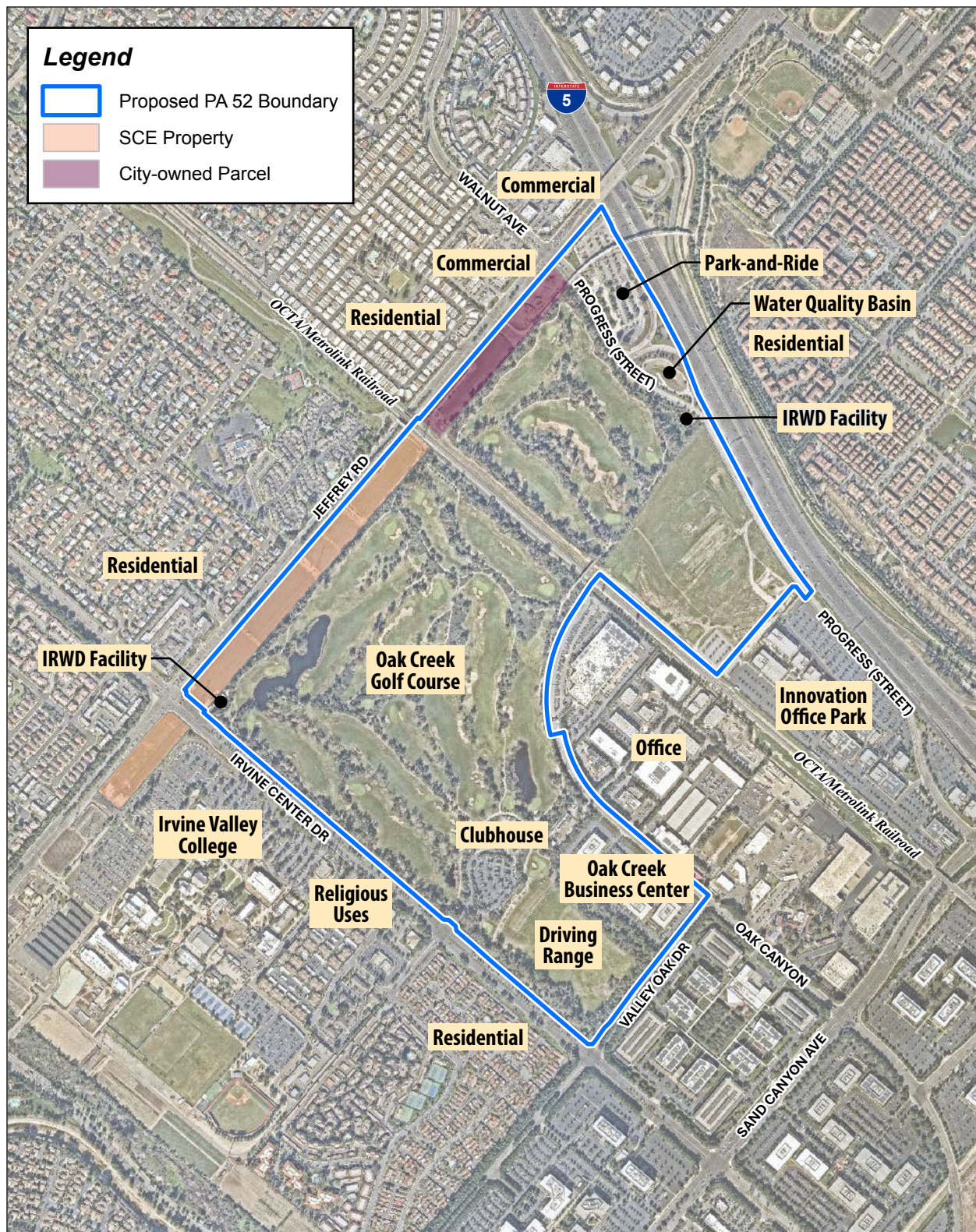
The proposed Project would not result in the development of residential units beyond those anticipated and evaluated in the GPU EIR under the approved General Plan and Zoning framework. The proposed allocation of up to 2,400 Focus Area 2 residential units is within the 4,907 residential units evaluated for portions of PA 12 in Focus Area 2 under the City’s approved General Plan and Zoning Ordinance amendments. Part of the Project site is already included within Focus Area 2 and the proposed Project includes a boundary adjustment to Focus Area 2 to include the entirety of the proposed PA 52 areas anticipated for residential development in the focus area.

In addition to the discretionary actions identified above, subsequent actions to implement the proposed Project would include, but may not be limited to master plan(s), including an Affordable Housing Plan (AHP); subdivision maps; park plans; a master landscape and trails plan (MLTP); other discretionary permits and approvals as required by the City and/or other agencies; and issuance of grading, building, and related permits. Permits and approvals would also be required by other agencies for the construction and operation of the proposed Project.

9. Surrounding Land Uses and Setting

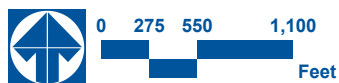
As shown on the aerial photograph provided in Figure 2, the Project site is situated in an urban area. Land uses surrounding the Project site include I-5 to the north; existing office

¹ The *2045 General Plan Update Final Program Environmental Impact Report* is available on the City’s website: <https://cityofirvine.gov/community-development/current-general-plan>



Source(s): Esri, Nearmap Imagery (January 2026), Wilson Mikami Corporation (June 2026)

Figure 2



Aerial Photograph

and other non-residential uses to the east and southeast; Irvine Center Drive, Irvine Valley College (IVC), religious uses, residential and office uses to the south and southeast; and Jeffrey Road and residential and commercial uses to the west and northwest.

As also shown on the aerial photograph provided on Figure 2, the Project site is comprised of the following existing and approved uses, which are currently within PA 12.

- **Oak Creek Golf Course.** Privately-owned golf facility, consisting of the approximately 162-acre golf course; an approximately 21-acre driving range; and 11 acres comprised of an 18,000-square-foot (sf) clubhouse, parking area, and a maintenance facility.
- **Oak Creek Business Center (6400-6440 Oak Canyon).** Approximately 11-acre area developed with four two-level office buildings (182,036 sf).
- **Innovation Office Park (IOP) Phases 3 and 4.** Approximately 31-acre undeveloped area with 517,069 sf of entitled but unbuilt building area located west of I-5 and south of Jeffrey Road and a portion of the Oak Creek Golf Course.
- **California Department of Transportation (Caltrans) park-and-ride lot.** Existing approximately 5.6-acre park-and-ride lot located north of Progress (a street), west of Jeffrey Road, and south of I-5.
- **City-owned property along Jeffrey Road.** Approximately 7-acre area north of the Orange County Transportation Authority (OCTA)/Metrolink railroad which is undeveloped except for City drainage facilities and the Manassero Farms use (farmstand) at the intersection of Walnut Avenue and Jeffrey Road. The northern portion of this property is currently being used as a construction staging area for the Jeffrey Open Space Trail (JOST) bridge over I-5, and the southern portion of this property is being used for agricultural purposes associated with Manassero Farms.
- **Southern California Edison (SCE)-owned property along Jeffrey Road.** Approximately 12-acre undeveloped area south of the railroad. This property is also being used for agricultural purposes associated with Manassero Farms.
- **Irvine Ranch Water District Facilities.** IRWD's desalting station located northeast of the golf course (approximately 0.2 acre), and recycled water facility located southwest of the golf course (approximately 0.2 acre).
- **Other Uses.** Progress (street), a privately-owned water quality basin, the railroad, and monitoring wells.

10. Other Public Agencies Whose Approval May Be Required

Agencies other than the City of Irvine that may use information contained in the CEQA documentation to issue permits or other approvals for development within the proposed Project site include, but are not limited to, the following:

- **California Department of Fish and Wildlife (CDFW)** – permits/approvals pursuant to the California Endangered Species Act and California Fish and Game Code, if applicable.

- **Caltrans** – permits/approvals for any improvements encroaching into Caltrans right-of-way.
- **Division of the State Architect** – permits/approvals associated with the portion of the proposed trail bridge over Irvine Center Drive, which would land on the northwest portion of IVC, and related IVC parking lot modifications.
- **California Regional Water Quality Control Board, Santa Ana Region** – National Pollutant Discharge Elimination System (NPDES) permit for stormwater discharges from construction sites, and De Minimis permit for groundwater dewatering, and a Waste Discharge Requirement (WDR) permit or waiver, if applicable.
- **California Public Utilities Commission (CPUC)** – utility infrastructure approvals (for Southern California Edison [SCE] and other utility companies under CPUC), if applicable.
- **South Coast Air Quality Management District (SCAQMD)** – permits to construct and/or permits to operate regulated equipment, if applicable.
- **Southern California Regional Rail Authority (SCRRA), Metrolink, and/or Orange County Transportation Authority (OCTA)** – railroad crossing permits/approvals associated with the proposed bridges for the roadway and trails system.
- **Orange County Fire Authority (OCFA)** – permits/approvals associated with Fire Master Plan.
- **Irvine Valley College and South Orange County Community College District** – permits/approvals associated with the portion of the proposed trail bridge over Irvine Center Drive, which would land on the northwest portion of IVC, and other improvements on the campus to accommodate the proposed Project (e.g., parking lot modifications).
- **IRWD** – Water Supply Assessment-related approval for proposed PA 52, a PA 52 Sub Area Master Plan (SAMP), and design approval for new Natural Treatment System (NTS) facilities, if applicable.
- **Irvine Unified School District (IUSD)** – permits/approvals associated with the proposed elementary school site.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

The City of Irvine will provide notification of the proposed Project to tribes that have previously requested notification of projects in the City, pursuant to the requirements of Assembly Bill (AB) 52. Additionally, because the proposed Project involves a General Plan amendment, Native American consultation pursuant to Senate Bill (SB) 18 will occur. A summary of the results of the Native American consultation process will be included in the forthcoming Draft Subsequent Environmental Impact Report (SEIR).

SECTION II. PROJECT BACKGROUND AND DESCRIPTION

II.1 Project Background

A. General Plan Update and Zoning Ordinance Amendment

On August 13, 2024, the Irvine City Council approved updates to its General Plan (City of Irvine 2045 General Plan Update) and Zoning Ordinance to implement the City's 2021-2029 Housing Element² (Housing Element) and to make other changes to the General Plan elements to reflect the changes in the environment, changes in the City's goals and policies, and changes in laws and regulations, that occurred since the last comprehensive General Plan update in 2000. On August 13, 2024, the City also certified the GPU EIR.

Stated objectives in the GPU EIR for the General Plan and Zoning Ordinance amendments that are applicable to the proposed Project include:

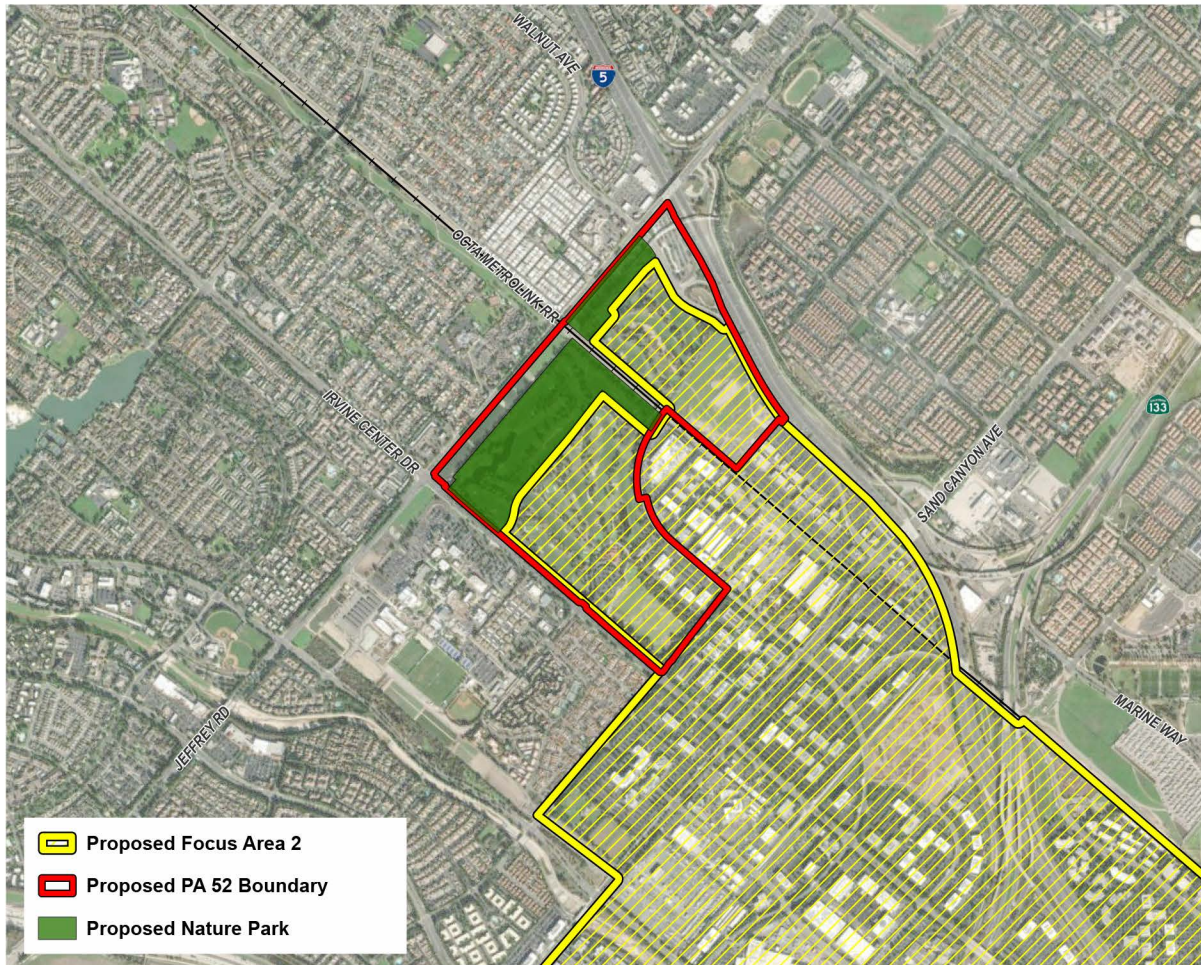
- Implement land use changes necessary to implement the Housing Element;
- Identify areas of opportunity and provide options to enhance development in key focus areas of the City while maintaining the City's signature master plan concept;
- Implement citywide policy direction to support a high quality-of-life for residents, businesses, and visitors into the future, including a focus on health and wellness; and
- Identify additional sites for residential and/or residential mixed-use development throughout the City using overlay zones to allow greater flexibility for property owners and developers.

Consistent with the Housing Element, the General Plan provides for up to 57,656 dwelling units in the City of Irvine. As a part of the General Plan, three focus areas were defined (Focus Areas 1, 2 and 3). As shown on Figure 3, portions of the Project site are within Focus Area 2.

The approved Zoning Ordinance amendments included approval of Chapter 5-9, *Residential and Residential Mixed-Use (RRMU) Overlay District*, of the Irvine Zoning Ordinance which established the RRMU Overlay (corresponding to GPU Focus Areas 1, 2 and 3) to accommodate a portion of the City's 6th Cycle Regional Housing Needs Assessment (RHNA) allocation. Areas within the RRMU Overlay are zoned for non-residential uses but are areas that are optimized for the integration of residential, mixed-use, and residential serving uses due to their proximity to employment centers and transit. Proposed residential and residential mixed-use development/redevelopment, subdivisions, and new residential land uses within the RRMU Overlay that expressly elect to use the additional rights provided by the RRMU Overlay are required to comply with applicable requirements of Chapter 5-9 of the Zoning Ordinance. Pursuant to Section 5-9-3(B) of the Zoning Ordinance, the underlying zoning designations for these districts remain unchanged. The City's adopted Objective Design Standards also apply to development in the RRMU Overlay.

The GPU EIR evaluated 57,656 new dwelling units Citywide and specifically evaluated development of 26,607 residential units within Focus Area 2, with 4,907 units being located within a portion of PA 12. The GPU EIR evaluated the potential construction-related and operational

² The City Council approved the Housing Element on May 10, 2022, and it was certified by the California Department of Housing and Community Development (HCD) on May 24, 2022.



Source(s): Irvine Company (2026)

Figure 3



Not to Scale

Proposed PA 52 and
Focus Area 2 Addition Boundaries

impacts associated with implementation of the additional residential units throughout the City as anticipated by the approved General Plan and Zoning Ordinance amendments. In conjunction with certification of the GPU EIR, the City also adopted a Mitigation Monitoring and Reporting Program (MMRP) (referred to herein as the “GPU EIR MMRP”). Projects implementing the General Plan, such as the proposed Project, are required to incorporate applicable mitigation measures included in the GPU EIR MMRP. This includes projects that propose residential development in Focus Area 2, such as the Project’s proposal for up to 2,400 units anticipated to be developed in Focus Area 2 (with boundaries amended as part of the proposed Project). Therefore, all relevant mitigation measures from the GPU EIR MMRP are incorporated into the proposed Project and would be implemented during construction and future operations. In addition to required mitigation measures, the GPU EIR referenced the City’s existing plans, programs, and policies (PPP) (including Irvine Standard Conditions) that are uniformly applied to development in the City and also serve to reduce environmental impacts. The applicable mitigation measures and PPPs are also listed in the introduction to the analysis for each topical issue evaluated in Section V of this document.

B. Planning Area 12 (Oak Creek) Zoning Text Amendment

On April 28, 2026, the City of Irvine approved a zone change to amend Section 9-12-7 of the Irvine Zoning Ordinance to include an alternative approach to implementing open space in PA 12 (Oak Creek; File No. 00976603-PZC; referred to herein as the PA 12 zoning text amendment). The amendment created a framework for the City to consider a future public nature park and trail system on a portion of the Oak Creek Golf Course as an alternative to the existing requirement that the site be retained and operated as a public golf course. The action did not approve any specific development project or change the underlying General Plan land use or zoning designations for the Project site.

II.2 Project Description

As described below, the proposed Project includes General Plan amendment, zone change, and Development Agreement applications to establish a new village (PA 52) totaling approximately 280 acres in the City. The proposed Project would include up to 2,400 residential units (inclusive of density bonus units). The proposed Project would also include a boundary adjustment to Focus Area 2 to include the entirety of the proposed PA 52 areas anticipated for residential development in the focus area (refer to Figure 3). With that boundary modification, the proposed Project would not involve development of any additional residential units in the City beyond those approved in the General Plan and Zoning Ordinance and evaluated in the GPU EIR.

The proposed Project would also include an approximately 61-acre public nature park and trail system, an approximately 10-acre K-6 elementary school site, neighborhood parks (approximately 8 acres), and on- and off-site circulation and utility infrastructure improvements. PNEPA 6 (Portola Springs) would be dedicated to the City of Irvine.

A. General Plan Amendment

The proposed General Plan amendment includes the following components:

- Amend the General Plan Land Use map to:
 - Reflect the new Medium-High Density land use designation for the proposed residential areas within proposed PA 52 that currently have a Preservation land use designation (refer to the existing and proposed PA 52 General Plan land use

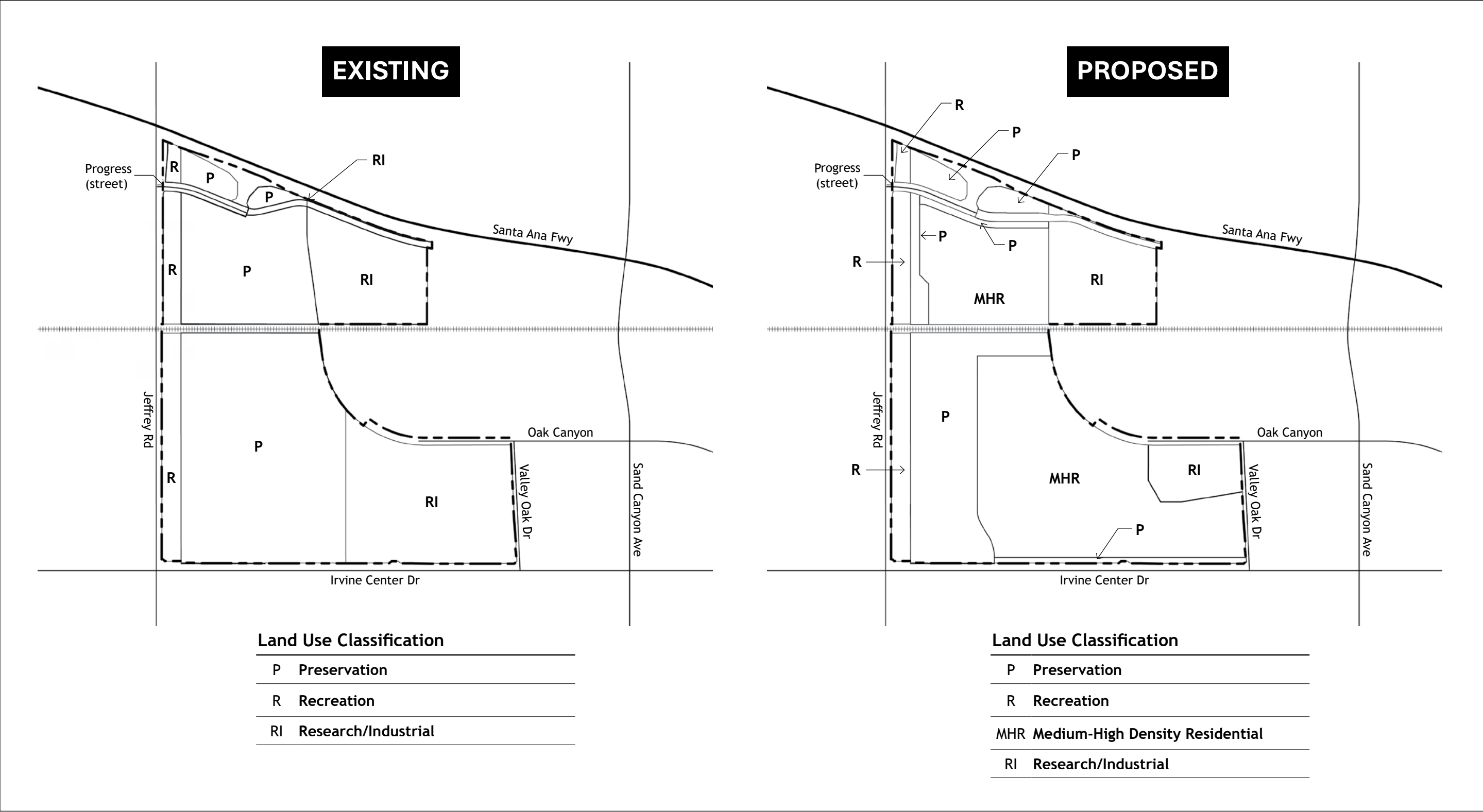
map provided on Figure 4), and to amend Focus Area 2 to include the entirety of the proposed PA 52 area anticipated for residential development in the focus area. As shown on Figure 4, the existing Research/Industrial General Plan land use designation for areas within the Project site would be retained.

- Amend General Plan Land Use Element Table A-1 to:
 - Establish a new Planning Area 52 with the associated land use categories shown on Figure 4; and
 - Assign zero dwelling units to the Medium-High Density residential land use category of Planning Area 52, with a note indicating a total of 2,400 dwelling units have been allocated to proposed PA 52 from the 26,607 dwelling units assigned to Focus Area 2, as reflected in Table A-1-1.
- Amend General Plan Land Use Element Table A-1-1 to allocate 2,400 dwelling units from the 26,607 dwelling units assigned to Focus Area 2 to proposed PA 52.
- Amend General Plan Land Use Element Table A-2 to reflect the reallocation of acreage from existing PA 12 (Oak Creek) to proposed PA 52.
- Modify and update other text and exhibits in various General Plan Elements to reflect and implement the proposed General Plan amendment.

B. Zone Change

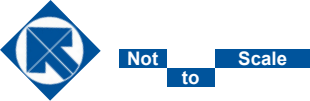
The proposed zone change would amend the Irvine Zoning Ordinance and include the following components:

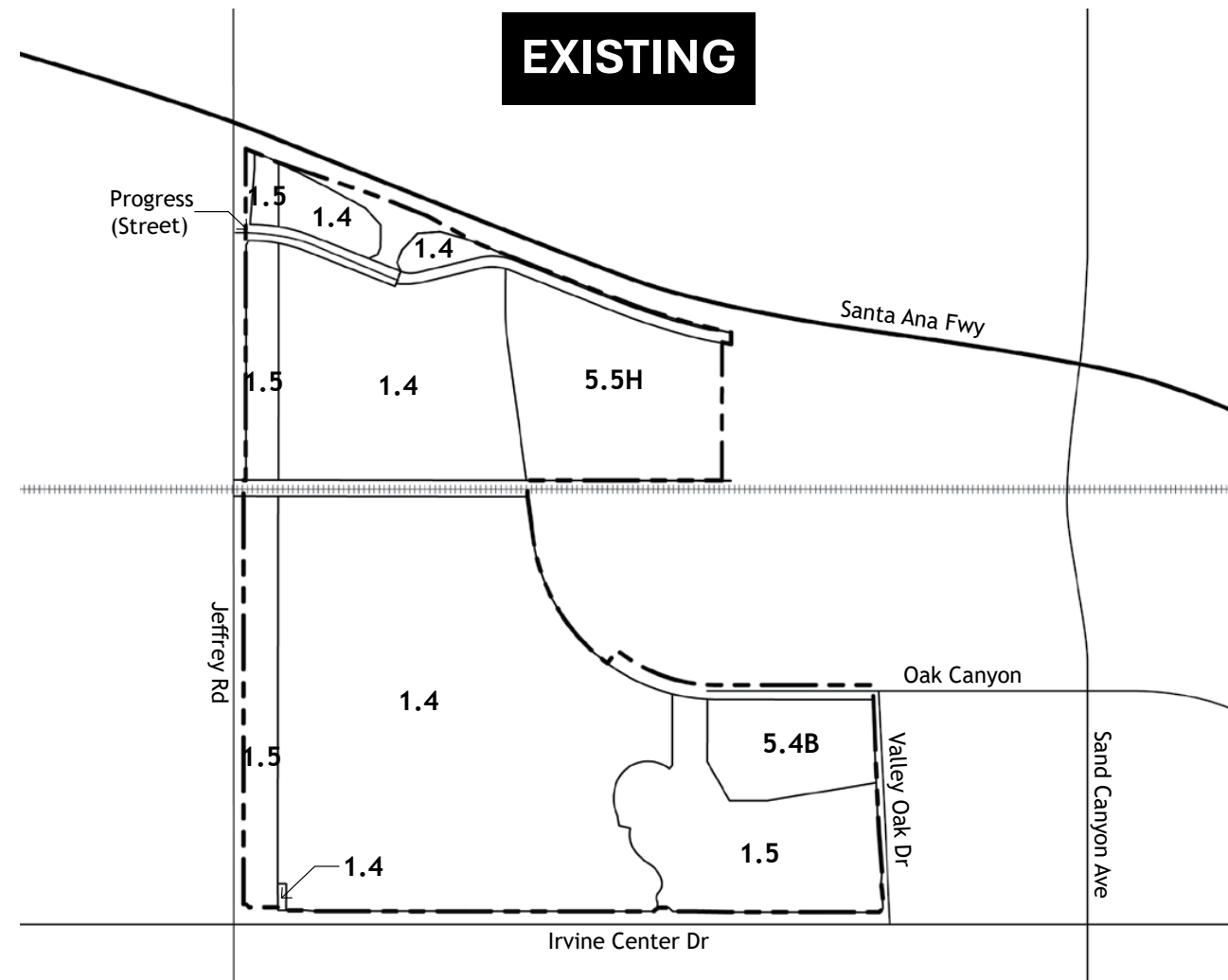
- Create new Chapter 9-52, *Planning Area 52*, for the proposed new village. Proposed PA 52 would include the following zoning districts (refer to Figure 5 for the existing and proposed zoning map for areas within the Project site):
 - 1.4 Preservation (approximately 9 acres)
 - 1.4B Preservation – Nature Park & Trails (approximately 61 acres)
 - 1.5 Recreation (approximately 21 acres)
 - 2.4K Medium-High Density Residential (approximately 128 acres)
 - 5.4C General Industrial (approximately 13 acres)
 - 5.5H Medical and Science (approximately 31 acres)
- Revise Chapter 5-9, *Residential and Residential Mixed-Use Overlay District (RRMU)*, to include proposed PA 52 and to reflect the revised Focus Area 2 boundary.
- Revise Chapter 9-12, *Planning Area 12 (Oak Creek)*, to reflect the proposed removal of the PA 52 area from PA 12, including from various tables and exhibits. Refer to the existing and proposed PA 12 zoning maps provided on Figure 6.



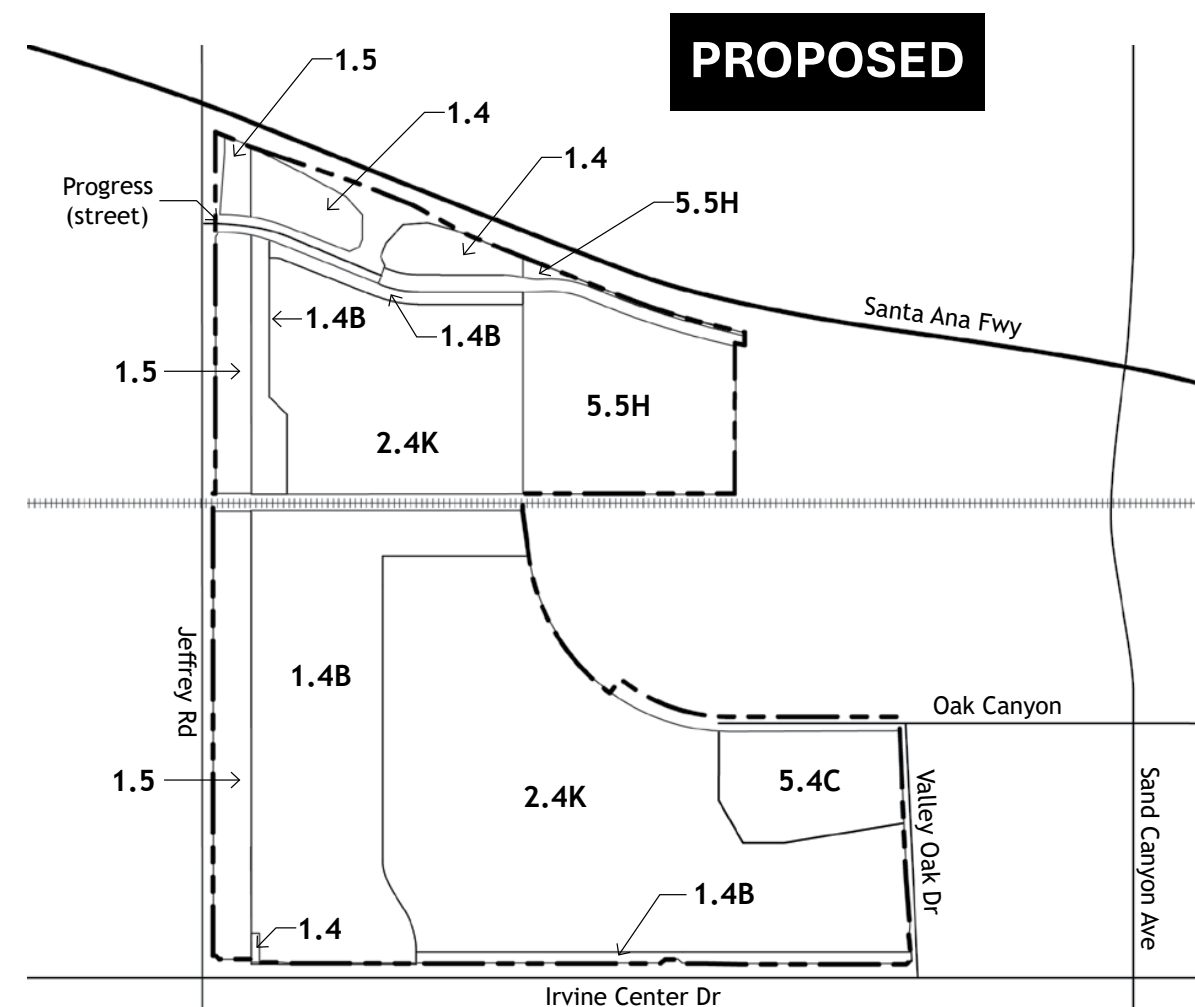
Source(s): Irvine Company (2026)

Figure 4





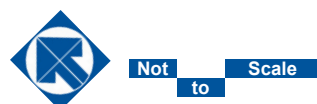
ZONE #	ZONING DISTRICT
1.4	Preservation
1.5	Recreation
5.4B	General Industrial
5.5H	Medical and Science



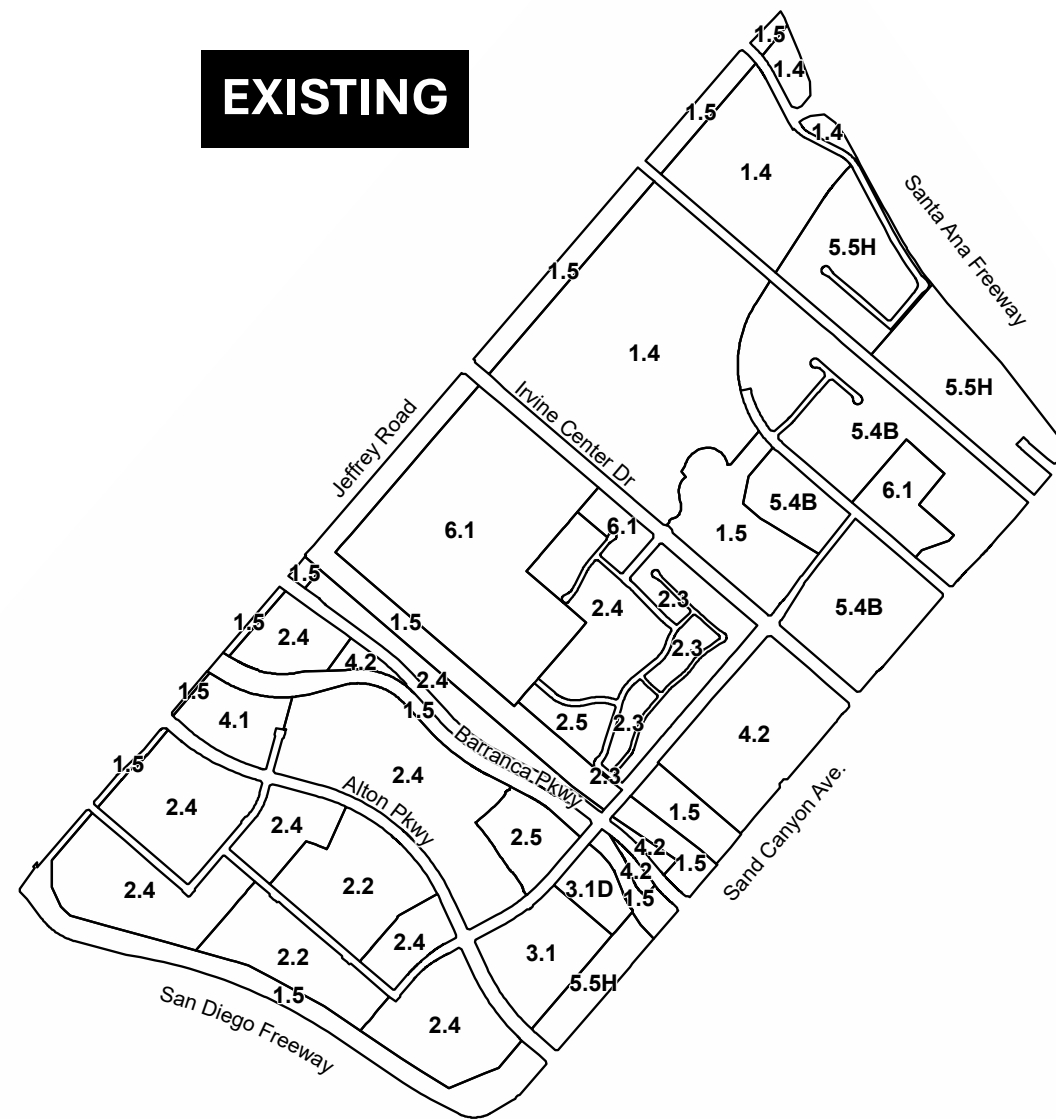
ZONE #	ZONING DISTRICT
1.4	Preservation
1.4B	Preservation (Nature Park & Trails)
1.5	Recreation
2.4K	Medium-High Density Residential
5.4C	General Industrial
5.5H	Medical and Science

Source(s): Irvine Company (2026)

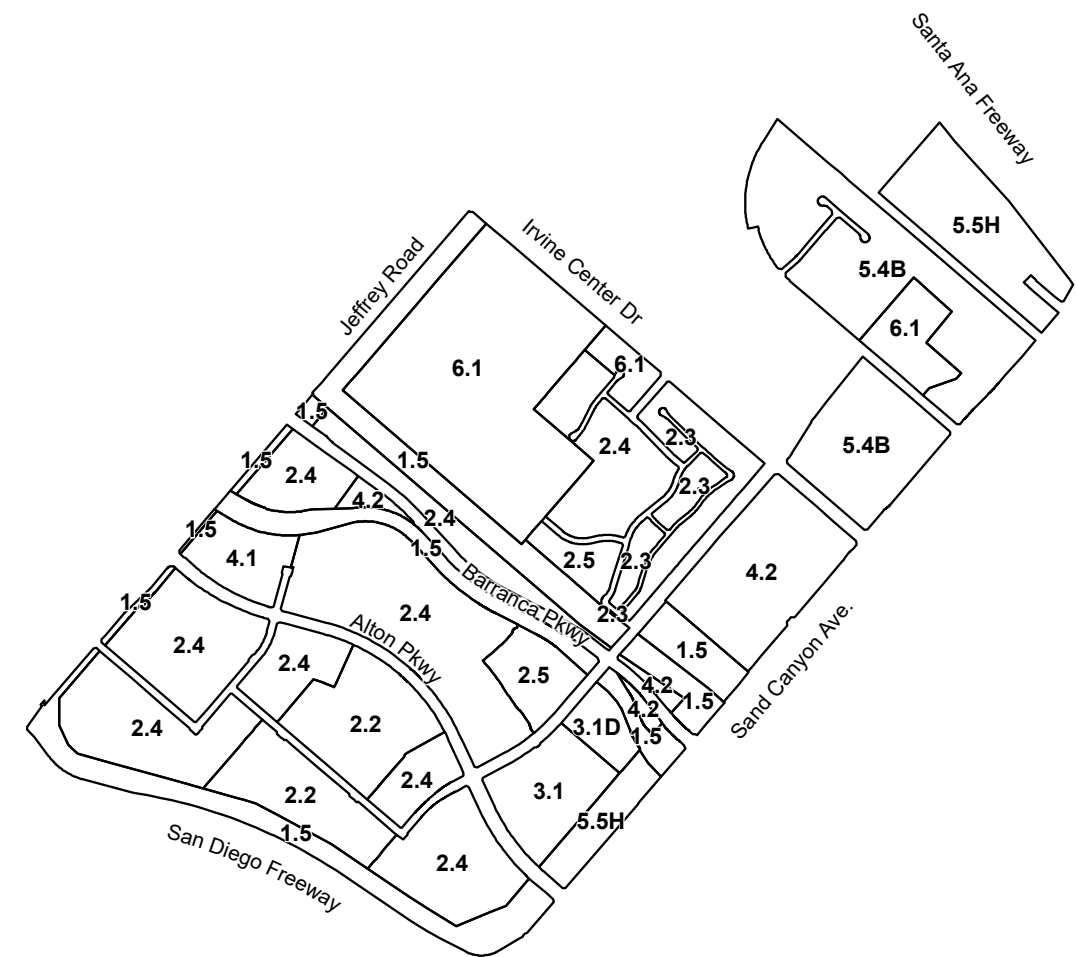
Figure 5



EXISTING



PROPOSED



ZONE #	ZONING DISTRICT	ZONE #	ZONING DISTRICT
1.4	Preservation	3.1D	Multi-Use
1.5	Recreation	4.1	Neighborhood Commercial
2.2	Low Density Residential	4.2	Community Commercial
2.3	Medium Density Residential	5.4B	General Industrial
2.4	Medium High Density Residential	5.5H	Medical and Science
2.5	High Density Residential	6.1	Institutional
3.1	Multi-Use		

Source(s): Irvine Company (2026)

Figure 6



- Revise Chapter 3-37, *Zoning District Land Use Regulations and Development Standards*, for the following zoning districts to include proposed PA 52:
 - Section 3-37-13 – 2.2 Low Density Residential,
 - Section 3-37-14 – 2.3 Medium Density Residential,
 - Section 3-37-15 – 2.4 Medium-High Density Residential, and
 - Section 3-37-16 – 2.5 High Density Residential.
- Include in new zoning (Chapter 9-52, *Planning Area 52*) all applicable development standards and processes related to parks, trails, and other village-related elements.
- Modify and update other text and exhibits in the Zoning Ordinance to reflect and implement the proposed zone change.

The square footage of the Oak Creek Business Center to be demolished (182,036 sf) and 517,069 sf of entitled but unbuilt building area associated with IOP Phases 3 and 4 would be retained as planned development capacity in PA 12.

C. Development Agreement

The proposed Project includes a Development Agreement. The Development Agreement provisions are anticipated to include:

- Provision of affordable housing including the potential for onsite and/or offsite affordable units.
- Community benefit payments to be paid to the City.
- An agricultural and open space management plan for the 312 acres of privately-owned open space in PA 1 (Orchard Hills) and PA 6 (Portola Springs) to be dedicated to the City consistent with the Irvine Zoning Ordinance.
- Dedication of an approximately 6-acre site in PA 1 (Orchard Hills) for a public community facility, to be determined by the City.

D. Subsequent Actions to Implement the Project

In addition to the discretionary actions described above, subsequent actions to implement the proposed Project would include, but may not be limited to master plan(s), including an AHP; subdivision maps; park plan; MLTP; other discretionary permits and approvals as required by the City; and issuance of grading, building, and related permits.

Permits and approvals that may be needed by other agencies for the construction and operation of the proposed Project are outlined in Section I, Project Information, of this Initial Study.

II.3 Anticipated Development for Purposes of Analysis

CEQA requires that reasonably foreseeable direct and indirect physical changes in the environment that may be caused by a project be evaluated. For purposes of analysis in this Initial Study, the following proposed uses and associated improvements located in or adjacent to

proposed PA 52 have been assumed and will be evaluated. A conceptual land use plan for development within proposed PA 52 is provided in Figure 7:

- **Residential Uses.** Up to 2,400 units (inclusive of density bonus units), consisting of 1,500 for-sale units and 900 rental units.
- **Nature Park and Trail System.** Consistent with Section 9-12-7 of Irvine Zoning Ordinance, an approximately 61-acre public nature park and a trail system would be provided east of Jeffrey Road. Amenities may include, but are not limited to, trails and trail improvements, a 12,000-sf nature center/public park facility and accessory uses, picnic areas, or similar uses. Improvements would also include landscaping, lighting, and accessory recreational amenities. There would be above-grade crossings of the railroad right-of-way and Irvine Center Drive (landing on the IVC property south of Irvine Center Drive), and there may also be trail connections extending from the proposed nature park across the City of Irvine and SCE properties along Jeffrey Road and connecting to the JOST along Jeffrey Road.
- **School.** 1,000-student IUSD K-6 school site (approximately 10 acres).
- **Neighborhood Parks.** Neighborhood parks (approximately 8 acres), which would include amenities such as clubhouse recreation centers, pools, and seating areas.
- **Other Improvements.** Landscape/hardscape, streetscapes, walls/fences, utilities, signage, and exterior lighting for safety, security and wayfinding.

Implementation of the proposed uses would also require various infrastructure improvements summarized below:

- **Circulation Improvements**
 - On-site roadways, access, pedestrian, and bicycle facilities to serve the proposed uses and provide connectivity to the site-adjacent roadways and pedestrian and bicycle facilities.
 - Realignment of a segment of Progress within the Project site.
 - Extension of Oak Canyon within the Project site north to Progress via an above grade bridge crossing over the railroad, and removal of the existing golf cart bridge.
 - Intersection improvements.
 - Trail improvements including lighting and landscape improvements along the Walnut Trail.
 - Grade-separated trail crossings at the railroad right-of-way and Irvine Center Drive, subject to all required right-of-way and site approvals.
 - Construction of multi-purpose paths including along the south side of Progress (adjacent to the Project site) and the south side of Oak Canyon (between Progress and Sand Canyon Avenue).
- **Utility Infrastructure**
 - IRWD water, sewer and recycled water facilities and points of connection as identified in the PA 52 SAMP.

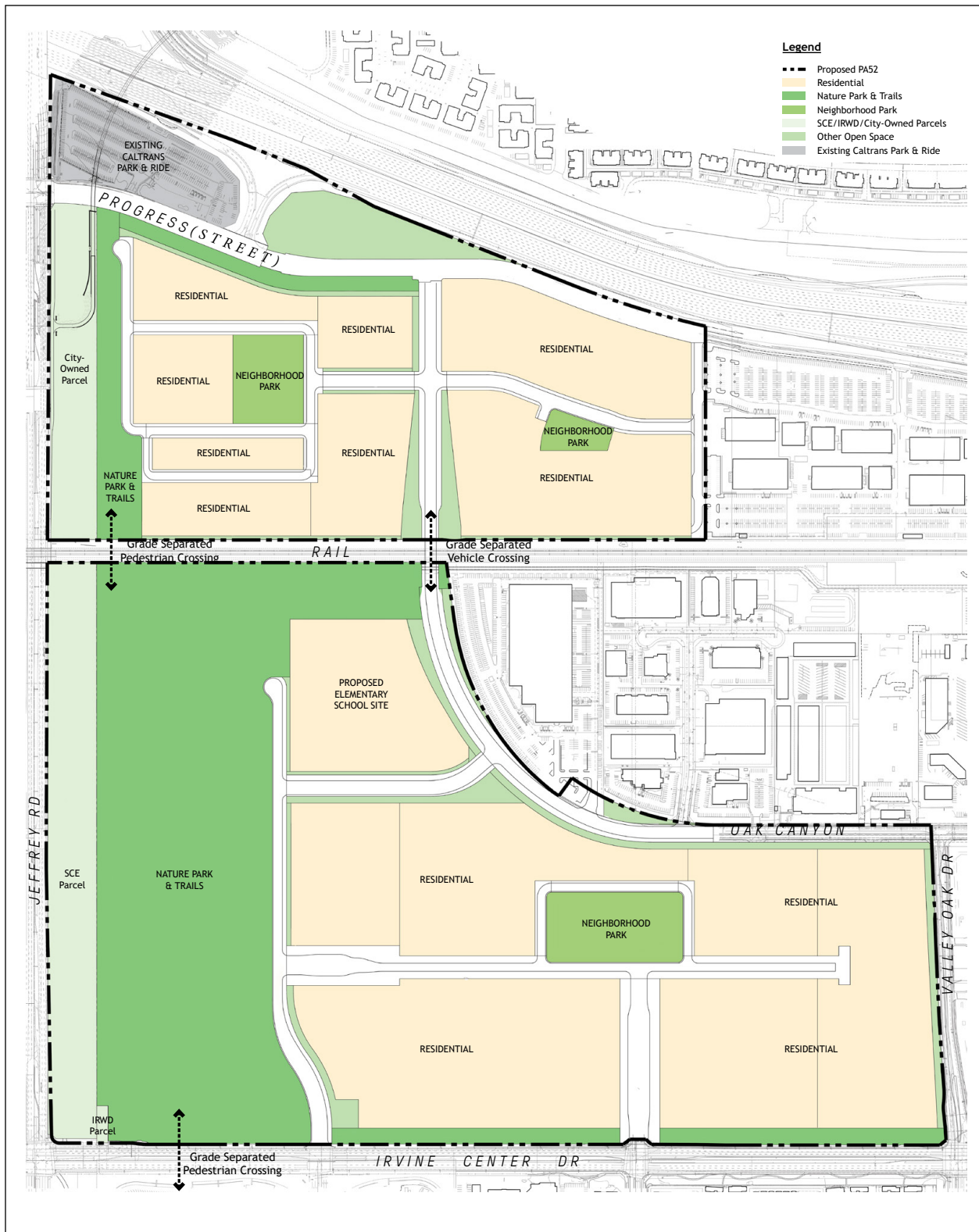


Figure 7



Not to Scale

Conceptual PA 52 Land Use Plan

- Storm drain infrastructure and water quality best management practices (BMPs), including Natural Treatment System (NTS) basins for water quality treatment.
- Dry utility installation and realignments (e.g., SCE, Southern California Gas Company, AT&T, and Cox Communications).

II.4 Physical Impact Area and Construction Assumptions

Construction of the proposed development outlined above would primarily occur within the Project site and areas adjacent to the Project site. The actual construction schedule would be based on market demand; however, for purposes of analysis it is conservatively estimated that construction would occur over an approximately five- to six-year period. Construction activities would include but not be limited to demolition of existing uses (e.g., the golf course improvements and driving range, and Oak Creek Business Center), mass grading of the proposed development areas, construction of the proposed uses, installation of utilities, and construction of roadways and other site improvements as described above. It is anticipated that the earthwork would be balanced (there would be no need for import or export of soil) and it is estimated that the maximum depth of excavation would be up to approximately 25 feet below the ground surface (bgs). It is expected that excavation in some locations would extend into native sediments.

Figure 8 depicts the anticipated on- and off-site physical improvement areas. The on-site improvement area includes the area within the Project site that is owned by the Project Applicant and that would be subject to physical improvements to implement the proposed Project, and the proposed improvements on the City-owned parcel between Progress and the railroad. The off-site improvement area includes the area adjacent to but not within the Project site that would be subject to physical improvements to implement the proposed Project. Off-site improvement areas are primarily associated with the following:

- Roadway and intersection improvements, which would primarily occur within existing roadway right-of-way that has already been disturbed and does not contain sensitive resources. Additional improvements not shown on Figure 8 may be proposed at other intersections in the vicinity of the proposed Project and would also be expected to occur in previously disturbed areas.
- Installation of utility infrastructure and connections to existing utilities, which would primarily occur within existing roadway rights-of-way. A new electric line would be added within the existing SCE conduit extending along Irvine Center Drive and Sand Canyon Avenue and connecting to the existing SCE Santiago Canyon Substation located east of the Sand Canyon Avenue/Barranca Parkway intersection. Improvements within the existing Santiago Canyon Substation, which is developed/disturbed under existing conditions, may also be required.
- Improvements associated with the construction of trails south of Progress to south of Irvine Center Drive, including improvements on the City of Irvine and IVC properties. The southern bridge landing on the IVC campus would also require modifications to the campus surface parking lot in this area; however, there would be no loss of parking spaces.

The proposed locations of the above-grade railroad crossings for trails and Oak Canyon are also shown on Figure 8. As previously discussed, the proposed Project includes proposed trail connections extending from the proposed nature park across the City of Irvine and SCE properties

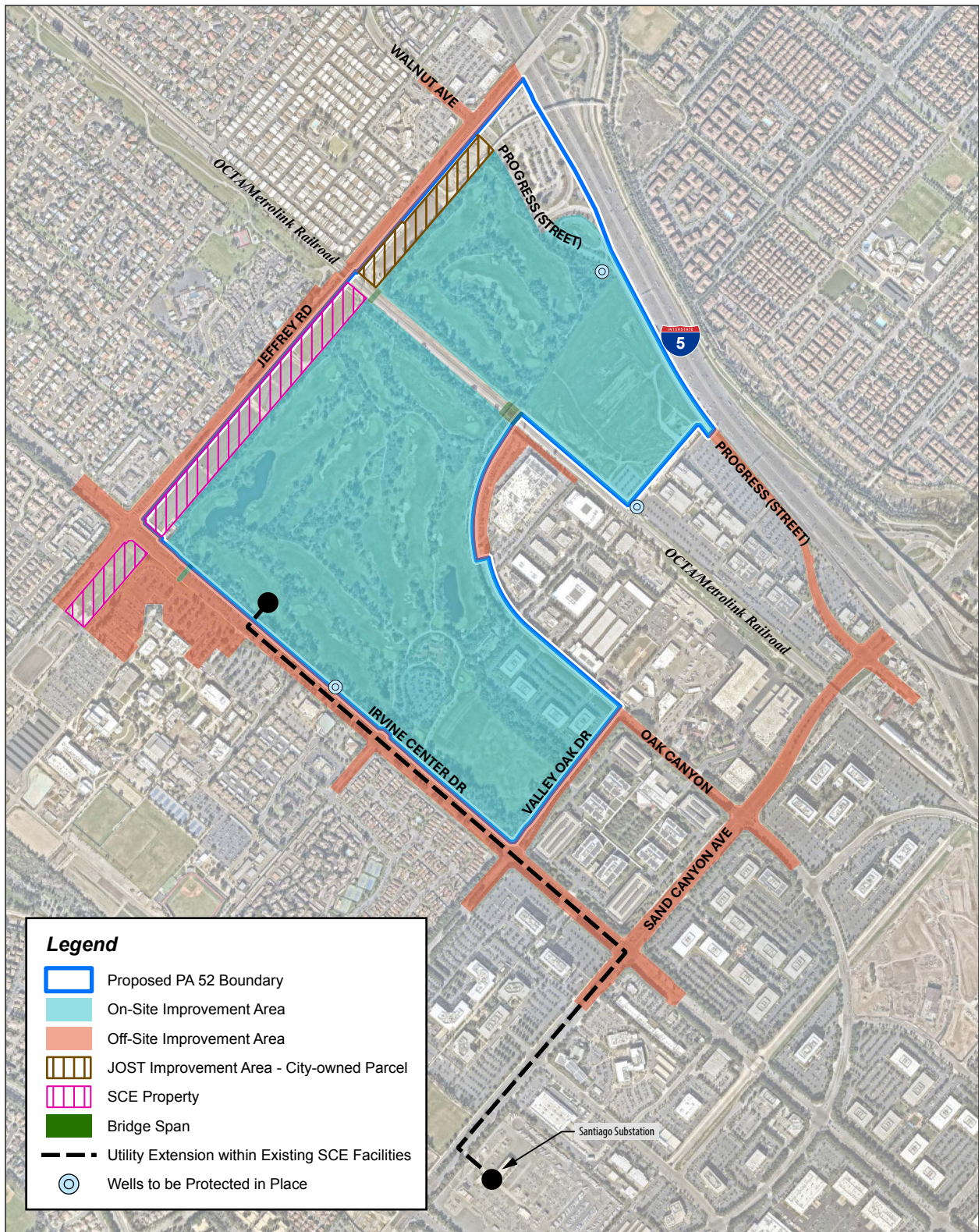
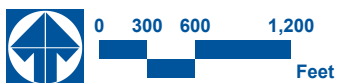


Figure 8



Physical Improvement Areas

along Jeffrey Road and connecting to Jeffrey Road. These properties have been previously disturbed primarily by temporary construction staging for the City's JOST extension project (on the City-owned property), and ongoing agricultural activities (within the SCE property). It is anticipated that trail crossings would be sited in previously disturbed locations.

There would be no changes to the following uses within the Project site or their associated General Plan land use and zoning designations as part of the proposed Project: the railroad; the existing Caltrans park-and-ride lot; the Manassero Farms use (farmstand), the JOST bridge currently under construction, and City drainage facilities on the City-owned property at the intersection of Progress and Jeffrey Road; SCE-owned property (with the exception of potential trail crossing discussed above); IRWD facilities; the privately-owned water quality basin; and existing monitoring wells.

SECTION III. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages:

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

SECTION IV. DETERMINATION

On the basis of this initial study and environmental evaluation:

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



Signature

Eric Martin, Senior Planner

Title

July 6, 2026

Date

City of Irvine

For

SECTION V. EVALUATION OF ENVIRONMENTAL IMPACTS

As previously discussed in Section II, Project Background and Description, the GPU EIR evaluated the development of 57,656 dwelling units in the City overall and specifically evaluated development of 26,607 residential units within Focus Area 2, including 4,907 units allocated to a portion of existing PA 12. This includes some of the areas within the Project site that are currently within PA 12 (refer to Figure 3). The GPU EIR evaluated the potential construction-related and operational impacts associated with implementation of the additional residential units throughout the City as anticipated by the approved General Plan and Zoning Ordinance amendments. The GPU EIR is a program EIR pursuant to CEQA Guidelines Section 15168. As such, the GPU EIR provides a programmatic analysis of the potential environmental impacts associated with implementation of the goals, policies, actions, and projected buildout of the approved General Plan and Zoning Ordinance amendments. As identified in Section 1.6.3, Subsequent Environmental Review, of the GPU EIR:

As allowed in State CEQA Guidelines Section 15168, Program EIR, future development proposals will be reviewed by the City in light of the Final PEIR. The PEIR and subsequent project review process, defined in Section 15168 of the State CEQA Guidelines, allows a PEIR to serve as the basis for environmental review of subsequent projects.

As identified in CEQA Guidelines Section 15063(c), the purposes of an Initial Study, among others are to: provide the Lead Agency with information to use as the basis for deciding whether to prepare an EIR or a Negative Declaration; and to assist in the preparation of an EIR, if one is required, by:

- (A) Focusing the EIR on the effects determined to be significant,
- (B) Identifying the effects determined not to be significant,
- (C) Explaining the reasons for determining that potentially significant effects would not be significant, and
- (D) Identifying whether a program EIR, tiering, or another appropriate process can be used for analysis of the project's environmental effects.

Further, pursuant to CEQA Guidelines Section 15063(c)(7), another purpose of an Initial Study is to determine whether a previously prepared EIR could be used with the project.

As described in Section II.2, Project Description, the proposed Project includes the development of up to 2,400 residential units that are allocated to a portion of Focus Area 2 under the approved General Plan and Zoning Ordinance amendments (subject to a boundary amendment to Focus Area 2 included in the proposed Project). The proposed Project would not involve the development of any additional residential units in the City beyond those in the approved General Plan and Zoning Ordinance and evaluated in the GPU EIR. However, the proposed Project also includes the development of uses that were not evaluated in the GPU EIR including a public nature park and trail system, a K-6 elementary school site, neighborhood parks, and on- and off-site circulation and utility infrastructure improvements.

The proposed Project requires a General Plan amendment and zone change. This Initial Study has been prepared to identify the probable environmental effects of the proposed Project and to determine the appropriate scope of additional environmental documentation to be completed for the proposed Project in light of the analysis in the GPU EIR. The environmental effects of the

proposed Project, including development in areas that are not within the existing Focus Area 2 boundaries, will be compared to the environmental effects of the development of 2,400 residential units within existing Focus Area 2 included as part of the approved General Plan and Zoning Ordinance.

The analysis contained within this Initial Study relies upon and incorporates by reference the GPU EIR, which includes all technical studies, analyses, technical reports, and other documents that were included or referenced in the Draft GPU EIR and Final GPU EIR. Consistent with the GPU EIR, this Initial Study uses the CEQA Guidelines Appendix G environmental checklist questions in the analysis presented below to review the potential environmental effects of the proposed Project for each of the topical issues identified above in Section III, Environmental Factors Potentially Affected. The City of Irvine has defined the column headings in this Initial Study checklist as follows:

- A) **“Additional Analysis Required”** applies to topical issues that will be evaluated in the forthcoming Draft SEIR.
- B) **“Less than Significant Impact or Less than Significant Impact with Incorporation of Previously Adopted GPU EIR MMs and PPPs”** applies where (1) the potential impacts of the proposed Project would not result in any significant effects and the impact is less than significant without the incorporation of previously adopted GPU EIR MMs and PPPs; or (2) the potential impacts of the proposed Project would be less than significant with incorporation of the applicable previously adopted GPU EIR MMs and PPPs and no Project-specific mitigation measures are required.
- C) **“No Impact”** applies where the proposed Project would result in no potential impact for the identified threshold of significance.

Based on the information and analysis presented for each topical issue in this Initial Study, the City has determined that additional Project-specific analysis is required for the following topical issues: Agriculture/Forestry Resources (Agriculture), Air Quality, Biological Resources, Energy, Geology/Soils (excluding paleontological resources), Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Noise, Public Services, Recreation, Transportation, Tribal Cultural Resources, and Utilities/Service Systems. The required analysis will be provided in a forthcoming Draft SEIR and the proposed Project's impacts will be evaluated in comparison to those analyzed in the GPU EIR for the approved General Plan and Zoning Ordinance amendments.

Further, based on the analysis presented in this section below, no further analysis for the following topical issues is required in the forthcoming Draft SEIR as the proposed Project would not result any new or substantially more severe impacts than those already identified, analyzed, and disclosed in the GPU EIR: Aesthetics, Agriculture/Forestry Resources (Forestry), Cultural Resources, Geology/Soils (paleontological resources), Mineral Resources, Population/Housing, and Wildfire.

V.1 Aesthetics

SUMMARY OF PREVIOUS ENVIRONMENTAL ANALYSIS

The analysis of aesthetic impacts resulting from implementation of the approved General Plan and Zoning Ordinance amendments is provided in Section 4.1 of the GPU EIR. The GPU EIR concluded that:

- Future development implementing the approved General Plan and Zoning Ordinance amendments would primarily occur in urbanized areas within the designated Focus Areas, and by concentrating most of the development within the Focus Areas, public views of scenic vistas that are primarily located in undeveloped and open space areas of the City would not be blocked. Further, the GPU includes objectives and policies to protect scenic resources and future projects would be required to comply with GPU EIR PPPs, which outline development standards guiding the design and character of structures, to further ensure that implementing projects would not impact scenic vistas. The GPU EIR concluded that impacts to scenic vistas due to future development implementing the approved General Plan and Zoning Ordinance amendments would be less than significant.
- There are no state-designated or eligible scenic highways within the City; therefore, future development implementing the approved General Plan and Zoning Ordinance amendments would not substantially damage scenic resources within a State Scenic Highway. The GPU EIR concluded that impacts to scenic resources due to future development implementing the approved General Plan and Zoning Ordinance amendments would be less than significant.
- The approved General Plan and Zoning Ordinance amendments would promote higher density residential and residential mixed-uses in three Focus Areas that are developed and urban in nature, and future implementing projects would be developed at densities that are consistent with existing uses in the area. Therefore, the GPU EIR concluded that future implementing projects would be consistent with the visual quality and character of surrounding development. Further, future development would be required to comply with City development standards outlined in the Municipal Code and Zoning Ordinance regulating building design and aesthetics. The GPU EIR concluded that there would be no conflict with applicable zoning and other regulations governing scenic quality and impacts from future development implementing the approved General Plan and Zoning Ordinance amendments would be less than significant.
- Future development implementing the approved General Plan and Zoning Ordinance amendments would introduce new sources of light and potentially glare in areas that are already developed with uses that emit nighttime lighting and daytime glare. All future implementing projects would be required to comply with state and local standards aimed at minimizing light and glare and, therefore, would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. The GPU EIR concluded that impacts related to the creation of light and glare would be less than significant.

Applicable GPU EIR PPPs

There are no GPU EIR MMs related to aesthetics. GPU EIR PPP AES-1 is not applicable to the proposed Project as no proposed structures would exceed 200 feet above ground level. The proposed Project is not within a Hillside Overlay District, so PPP AES-6 is also not applicable to the proposed Project.

The following GPU EIR PPPs related to aesthetics are applicable to the proposed Project.

PPP AES-2 Compliance with Municipal Code Section 5-9-517, Special Nonresidential Building Provisions

PPP AES-3 Compliance with Zoning Ordinance Chapter 3-16, Lighting

PPP AES-4 Compliance with Zoning Ordinance Chapter 3-15, Landscaping Standards

PPP AES-5 Compliance with Zoning Ordinance Chapter 3-37, Zoning District Land Use Regulations and Development Standards

PPP AES-7 Compliance with Zoning Ordinance Division 7, Signs

PPP AES-8 Compliance with Irvine Standard Condition 3.6, Site Lighting Requirements

ENVIRONMENTAL REVIEW

Issue	Additional Analysis Required	Less than Significant Impact or Less than Significant Impact with Incorporation of Previously Adopted GPU EIR MMs and/or PPPs	No Impact
I. AESTHETICS: Compared to the assumptions, analysis, and conclusions presented in the GPU EIR, would the proposed Project (compared to the approved General Plan and Zoning Ordinance amendments):			
a) Have a substantial adverse effect on a scenic vista?	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views the site and its surroundings (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☒	☐

a) *Would the Project have a substantial adverse effect on a scenic vista?*

Less than Significant Impact with Incorporation of Previously Adopted GPU EIR MMs and/or PPPs. As described in the GPU EIR, a scenic vista is generally defined as a view of undisturbed natural lands exhibiting a unique or unusual feature that comprises an important or dominant portion of the viewshed. Scenic vistas may also be represented by a particular distant view that provides visual relief from less attractive views of nearby features. Other designated federal and state lands, as well as local open space or recreational areas, may also offer scenic vistas if they represent a valued aesthetic view within the surrounding landscape.

The proposed Project would implement up to 2,400 residential units of the 26,607 units anticipated to be developed in Focus Area 2 as part of the approved General Plan and Zoning Ordinance amendments (4,907 of those units evaluated as being located within a portion of existing PA 12), as well as additional uses consisting of a nature park and trail system including trail connections to the JOST, neighborhood parks, a site for possible development of an elementary school, and on- and off-site roadway and infrastructure improvements. As previously described, the Project site, a portion of which is within Focus Area 2, is currently developed primarily with the Oak Creek Golf Course, four buildings within the Oak Creek Business Center, a Caltrans park-and-ride lot, and the Manassero Farms farmstand. Other areas within the Project site consist primarily of undeveloped areas, the railroad, and infrastructure-related uses. As shown on GPU EIR Figure 4.1-1, Visual Resources in the City, the Project site is not located within an area defined by the City as being within a “Major View.” The Project site is approximately 0.5 miles from the nearest Major View, which is located at the intersection of Jeffrey Road and Barranca Parkway to the southwest. This Major View is directed toward the southwest, away from the Project site. Therefore, the proposed Project would not impact views from this designated Major View location. Notable visual resources within the City are described in GPU EIR Table 4.1-1 and include hills, natural watercourses, and artificial lakes. There are no City-designated visual resources within the Project site, including the existing golf course.

As also shown on GPU EIR Figure 4.1-1, Visual Resources in the City, Jeffrey Road adjacent to the Project site is identified as a roadway with “Rural or Natural Character.” The mature trees along the perimeter of the golf course and undeveloped nature of the City- and SCE-owned properties along Jeffrey Road contribute to this designation. The visual character of the Project site as viewed from Jeffrey Road is depicted on the photographs presented on Figure 9a through Figure 9c. Consistent with the City’s Zoning Ordinance, the proposed Project would include the development of an approximately 61-acre nature park and trail system along the western portion of the Project site, and improvements within the City-owned property along Jeffrey Road. The SCE-owned property along Jeffrey Road would be retained in its current condition with the exception of potential trail connections, subject to approval by SCE, and existing trees within the median of Jeffrey Road would be retained. Views from Jeffrey Road of the proposed residential uses and school site would largely be obstructed by the JOST and nature park and trail system, which extend from Progress to Irvine Center Drive. Therefore, although views from Jeffrey Road would be altered with implementation of the proposed Project, the JOST and nature park and trail system would provide rural and natural characteristics. Further, the proposed Project would implement applicable GPU EIR PPPs established to protect scenic resources, including but not limited to GPU EIR PPP AES-5 (comply with Zoning Ordinance Chapter 3-37, Zoning District Land Use Regulations and Development Standards). Therefore, the proposed Project would not have a substantial adverse effect on a scenic vista and this impact would be less than significant.

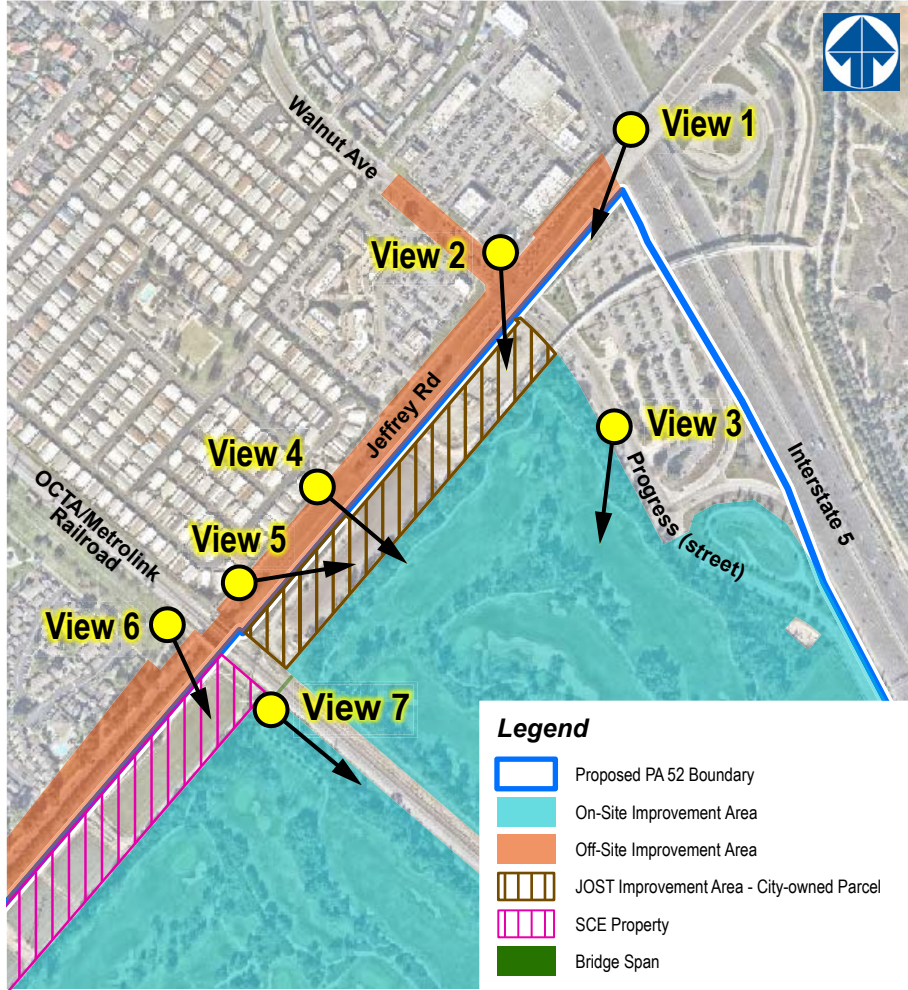


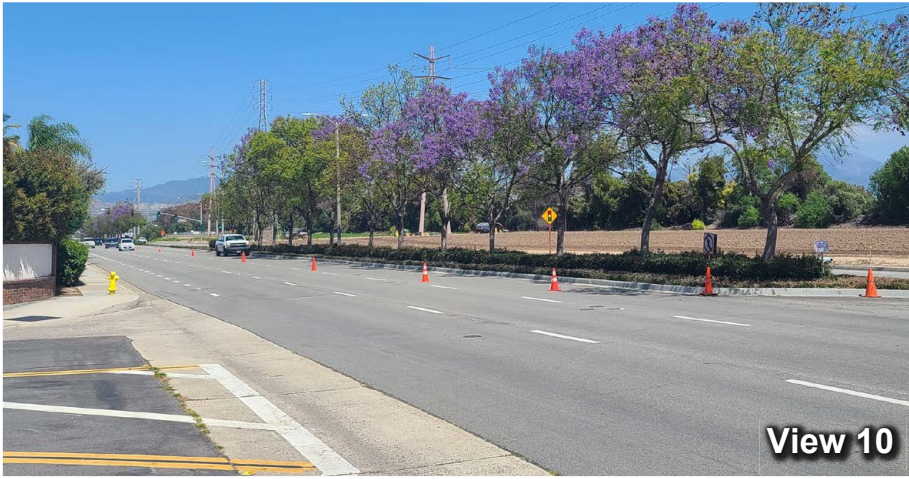
Figure 9a



View 8



View 9



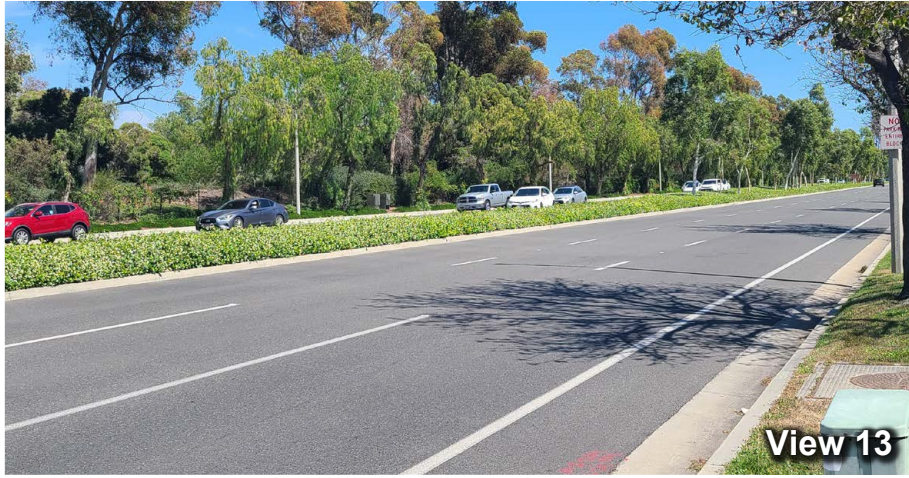
View 10



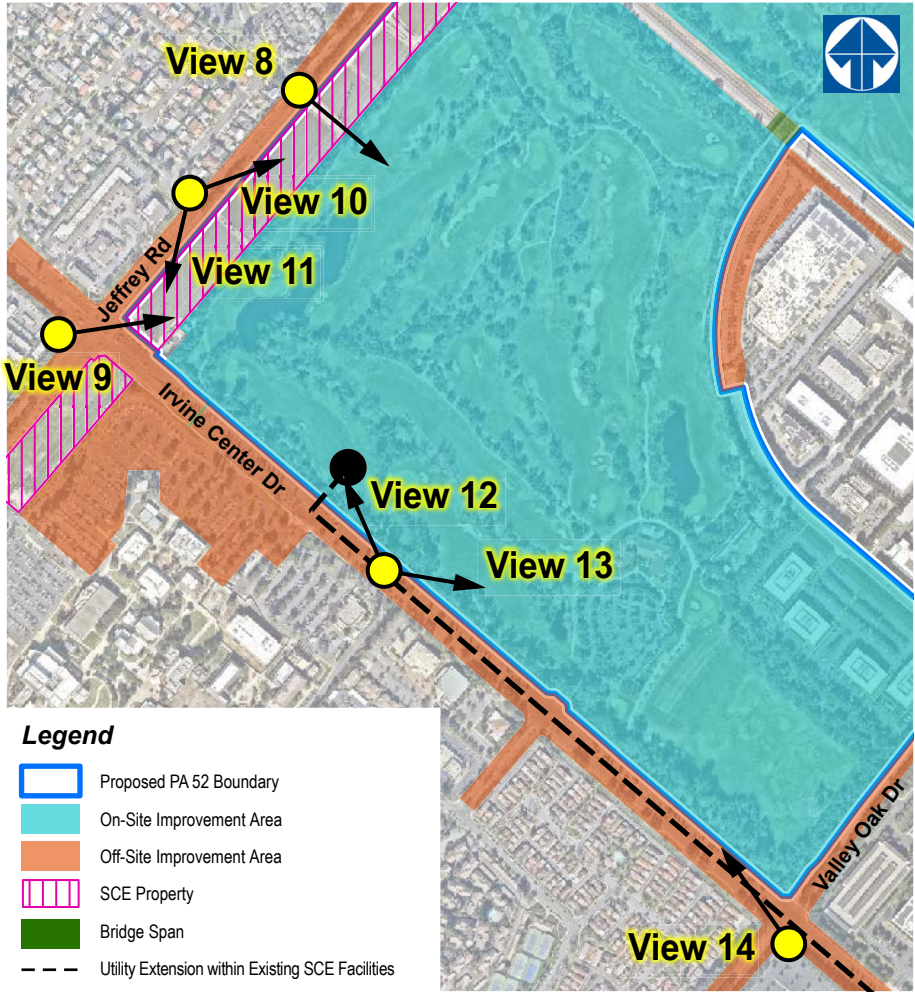
View 11



View 12



View 13



View 14

Figure 9b

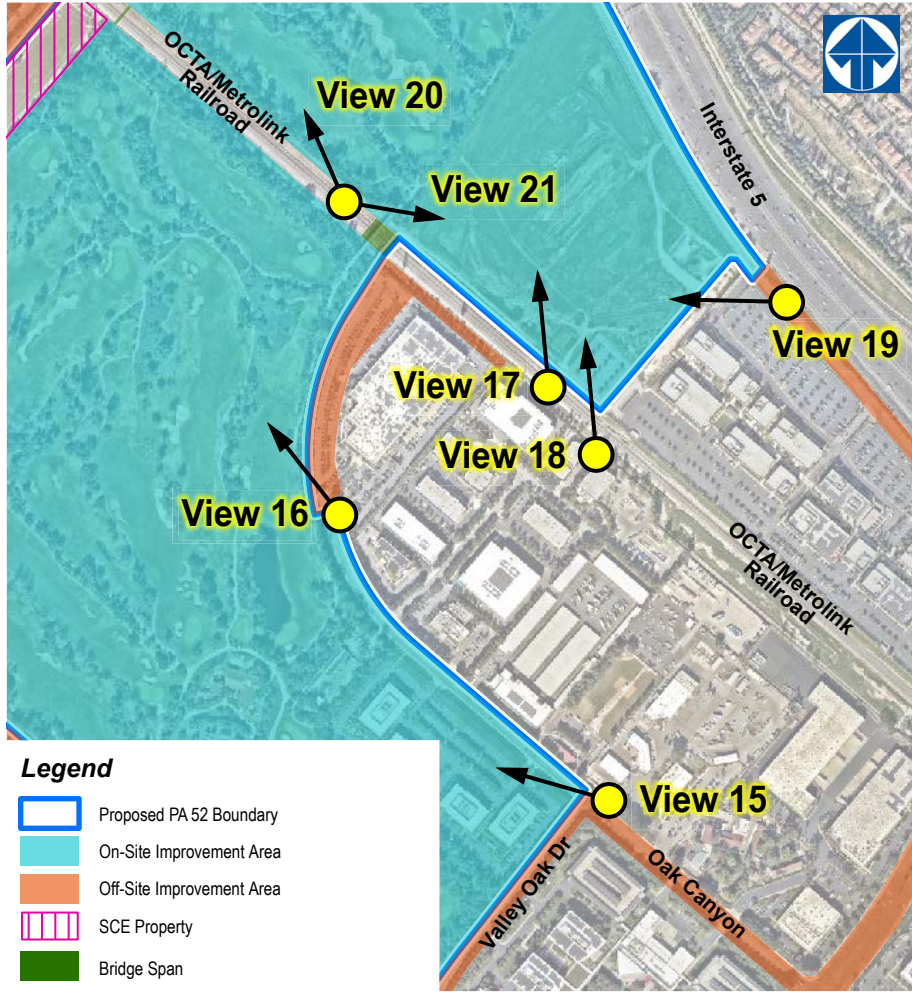


Figure 9c

Consistent with the conclusion of the GPU EIR, the proposed Project would result in less than significant impacts related to scenic vistas. Therefore, the proposed Project would not result in any new or substantially more severe impacts related to scenic vistas than those already identified, analyzed, and disclosed in the GPU EIR. No further analysis is required.

b) Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. According to Caltrans, there are no eligible or officially designated scenic highways in proximity to the Project site (Caltrans, 2026). The nearest officially designated State scenic highway is a portion of SR-91 located approximately 11.3 miles to the northwest of the Project site, and the nearest eligible State scenic highway is Pacific Coast Highway (SR-1) located approximately 7.7 miles to the southwest. The Project site is not visible from any designated or eligible State scenic highway due to distance and intervening urban development. Thus, there would be no impact to scenic resources within a state scenic highway, consistent with the conclusion of the GPU EIR. The proposed Project would not result in any new or substantially more severe impacts related to scenic resources along a state scenic highway than those already identified, analyzed, and disclosed in the GPU EIR. No further analysis is required.

c) Would the Project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?

Less than Significant Impact with Incorporation of Previously Adopted GPU EIR MMs and/or PPPs. The proposed Project is located in an urbanized area and is within the boundaries of the Census-defined Los Angeles-Long Beach-Anaheim urban area (USCB, 2023); therefore, for the analysis of Threshold “c,” the proposed Project would result in a significant adverse impact if the proposed Project design conflicts with applicable zoning and other applicable regulations governing scenic quality.

As previously described, the Project site, a portion of which is located within the existing boundaries of Focus Area 2, is currently developed primarily with the Oak Creek Golf Course, four buildings within the Oak Creek Business Center, a Caltrans park-and-ride lot, and the Manassero Farms farmstand. Other areas within the Project site consist primarily of undeveloped areas, the railroad, and utility infrastructure-related uses. Views into the majority of the Project site are primarily obstructed by mature trees along the perimeter of the golf course (refer to the photographs of the Project site from site-adjacent public vantage points presented on Figure 9a through Figure 9c).

The proposed Project would implement up to 2,400 residential units of the 26,607 units anticipated to be developed in Focus Area 2 as part of the approved General Plan and Zoning Ordinance amendments (4,907 of those units evaluated as being located within a portion of existing PA 12), as well as additional uses consisting of a nature park and trail system including connections to the JOST, neighborhood parks, an elementary school site, and on- and off-site roadway and infrastructure improvements required to support the proposed uses. Consistent with Irvine Zoning Ordinance Chapter 2-17, Master Plan, and as identified in Section II.2, Project Description, of this Initial Study, master plan applications would be submitted to the City for future development within the Project site. Additionally, future development would be implemented in accordance with the requirements outlined in the proposed new Irvine Zoning Ordinance Chapter 9-52 for proposed

PA 52. Proposed Irvine Zoning Ordinance Chapter 9-52 outlines various requirements addressing scenic quality including but not limited to the provision of open space (including the public nature park and trail system); City approval of a Park Plan, which would address the nature park and neighborhood parks; City approval of a MLTP; the required village theme; residential architecture requirements (overall form, roof form, architectural details and features, site design, and building heights); setbacks; the JOST; and wall and fence design. With respect to architecture, the design is required to provide articulation on all sides of the structures visible from streets, paseos, and other public areas. A variety of architectural styles and forms would be used to express differences among the respective neighborhoods within proposed PA 52. There would be a minimum 70-foot-wide landscape area along Irvine Center Drive, and building heights within 150 feet of Irvine Center Drive would not exceed two stories.

The proposed Project would also involve the incorporation of the proposed residential areas of the Project site not currently within Focus Area 2 into this focus area. Future development within the Project site would be subject to requirements outlined in Irvine Municipal Code Chapter 5-9, Residential and Residential Mixed-Use Overlay District (RRMU), including the requirement to submit an application for a Master Plan, as noted previously, and the requirement to comply with the City's adopted Objective Design Standards, as applicable.

Further, as with all development within the City, the proposed Project would also be implemented in conformance with the City's Municipal Code and Zoning Ordinance requirements, including those outlined in GPU EIR PPP AES-2 (Compliance with Municipal Code Section 5-9-517, Special Nonresidential Building Provisions); PPP AES-3 (Compliance with Zoning Ordinance Chapter 3-16, Lighting); PPP AES-4 (Compliance with Zoning Ordinance Chapter 3-15, Landscaping Standards); PPP AES-5 (Compliance with Zoning Ordinance Chapter 3-37, Zoning District Land Use Regulations and Development Standards); PPP AES-7 (Compliance with Zoning Ordinance Division 7, Signs); and PPP AES-8 (Compliance with Irvine Standard Condition 3.6, Site Lighting Requirements). As identified in the GPU EIR, compliance with the City's code and site-specific review of the design of future projects would ensure their compatibility with the aesthetic character of the area.

With respect to the proposed elementary school site, the Division of the State Architect provides design oversight for K-12th grade schools and any future elementary school within the Project site would be subject to design review by IUSD and the Divisions of the State Architect. Consistent with how IUSD typically develops school sites, IUSD would utilize standards that are consistent with neighborhood development in terms of height and massing and architecture.

Consistent with the analysis presented in the GPU EIR, future development within the Project site would comply with applicable regulations governing scenic quality and the overall change in visual character would be consistent with the existing urbanized development in the surrounding area. With implementation of the identified GPU EIR PPPs, and adherence to applicable existing and proposed regulations governing scenic quality, this impact would be less than significant, consistent with the conclusion of the GPU EIR. The proposed Project would not result in any new or substantially more severe impacts related to visual character and quality than those already identified, analyzed, and disclosed in the GPU EIR. No further analysis is required.

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

Less than Significant Impact with Incorporation of Previously Adopted GPU EIR MMs and/or PPPs. The Project site is in an urbanized area of the City and the areas surrounding the Project site are already developed with urban uses, including residential and non-residential

development, and adjacent roadways, that emit nighttime lighting and have the potential to create daytime glare. Additionally, the existing practice facility/driving range includes nighttime lighting.

As identified in the GPU EIR, the proposed Project, which implements residential units anticipated to be developed in Focus Area 2 as part of the approved General Plan and Zoning Ordinance amendments, would introduce new sources of light and glare associated with the residential buildings and vehicles in the area. The proposed nature park and trail system, neighborhood parks, and school site would also include necessary lighting typical of a community development within the City for safety and wayfinding. As required, and consistent with existing urban areas in the City, the proposed Project would comply with applicable regulations addressing light and glare and the following GPU EIR PPPs: PPP AES-2 (comply with Municipal Code Section 5-9-517 related to standards and requirements for lighting and glare in the City); PPP AES-3 (comply with lighting standards outlined in the City's Zoning Ordinance including the requirements for outdoor lighting to be designed and installed so that all direct rays are confined to the site and adjacent properties are protected from glare); and PPP AES-8 (comply with City Standard Condition 3.6 related to site lighting requirements). With adherence to applicable regulations, implementation of the proposed Project would not create a new source of substantial light which would adversely affect day or nighttime views in the area; therefore, impacts related to light and glare would be less than significant. With implementation of the applicable GPU EIR PPPs, lighting impacts would be less than significant with development of the proposed Project, consistent with the conclusion of the GPU EIR.

Glare can be caused by the reflection of sun off highly reflective surfaces during the day, and the reflection of artificial light sources (e.g., automobile headlights). Future development within the Project site would include the installation of high-performance glass that does not produce excessive glare, and the use of building materials that have low-reflectivity. Additionally, the proposed Project would not involve the use of building materials that would create a substantial new source of glare that would affect daytime views.

With implementation of the applicable GPU EIR PPPs and compliance with applicable regulations, including the CALGreen Code, the proposed Project would result in less than significant impacts related to light and glare, consistent with the conclusion of the GPU EIR. Therefore, the proposed Project would not result in any new or substantially more severe impacts related to light and glare than those already identified, analyzed, and disclosed in the GPU EIR. No further analysis is required.

V.2 Agricultural Resources and Forestry Resources

SUMMARY OF PREVIOUS ENVIRONMENTAL ANALYSIS

The analysis of impacts to agricultural and forestry resources resulting from implementation of the approved General Plan and Zoning Ordinance amendments is provided in Chapter 6.0, Effects Found Not to be Significant, of the GPU EIR. Relevant to the analysis of forestry resources presented below, the GPU EIR concluded that:

- The City does not possess any zoning classifications for forest land, timberland, or timberland production zones, and there is no forest land within the City; therefore, the GPU EIR concluded that impacts to forestry resources resulting from future development implementing the approved GPU and Zoning Ordinance amendments would be less than significant.

Issue	Additional Analysis Required	Less than Significant Impact or Less than Significant Impact with Incorporation of Previously Adopted GPU EIR MMs and PPPs	No Impact
II. <u>AGRICULTURAL RESOURCES AND FORESTRY RESOURCES:</u> Compared to the assumptions, analysis, and conclusions presented in the GPU EIR, would the proposed Project (compared to the approved General Plan and Zoning Ordinance amendments):			
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☒	☐	☐
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☒	☐	☐
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☒	☐	☐

ENVIRONMENTAL REVIEW

- a) ***Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?***
- b) ***Would the Project conflict with existing zoning for agricultural use, or a Williamson Act contract?***
- e) ***Would the Project Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?***

Additional Analysis Required. The GPU EIR evaluated impacts to Farmland and agricultural resources associated with development of 57,656 new dwelling units Citywide with 26,607 residential units within Focus Area 2. Of those Focus Area 2 units, the GPU EIR evaluated 4,907 units as being located within a portion of PA 12 (Oak Creek). The GPU EIR determined that impacts to Farmland and impacts to agricultural resources associated with a conflict with existing zoning would be less than significant. The GPU EIR also concluded that there would be no impacts related to conflict with a Williamson Act contract.

The proposed Project includes the development of 2,400 residential units that are allocated to a portion of Focus Area 2 under the approved General Plan and Zoning Ordinance. In addition to these residential uses, the proposed Project also includes the development of a public nature park and trail system, a K-6 elementary school site, neighborhood parks, and on- and off-site circulation and utility infrastructure improvements. Based on review of the current California Department of Conservation (DOC)'s California Farmland Mapping and Monitoring Program (FMMP), the Project site includes land classified as Prime Farmland (DOC, 2022). The areas currently classified as Prime Farmland (approximately 35.3 acres) include areas located adjacent to and south of Progress within Focus Area 2, and within the SCE parcel. Analysis of the proposed Project's potential impacts related to agricultural resources will be provided in the forthcoming Draft SEIR.

- c) ***Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?***
- d) ***Would the Project result in the loss of forest land or conversion of forest land to non-forest use?***

No Impact. Consistent with the conclusion of the GPU EIR, the Project site and off-site improvement areas are not zoned as forest land, timberland, or a Timberland Production zone, and there is no forest land within the Project site or off-site improvement areas. Therefore, no impacts would result. Therefore, the proposed Project would not result in any new or substantially more severe impacts related to forest land resources than those already identified, analyzed, and disclosed in the GPU EIR. No further analysis is required.

V.3 Air Quality

Issue	Additional Analysis Required	Less than Significant Impact or Less than Significant Impact with Incorporation of Previously Adopted GPU EIR MMs and PPPs	No Impact
III. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Compared to the assumptions, analysis, and conclusions presented in the GPU EIR, would the proposed Project (compared to the approved General Plan and Zoning Ordinance amendments):			
a) Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☒	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	☒	☐	☐

- a) ***Would the Project conflict with or obstruct implementation of the applicable air quality plan?***
- b) ***Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?***
- c) ***Would the Project expose sensitive receptors to substantial pollutant concentrations?***
- d) ***Would the Project result in other emissions (such as those leading to odors adversely affecting a substantial number of people)?***

Additional Analysis Required. The GPU EIR evaluated air quality impacts associated with development of 57,656 new dwelling units Citywide with 26,607 residential units within Focus Area 2. Of those Focus Area 2 units, the GPU EIR evaluated 4,907 units as being located within a portion of PA 12 (Oak Creek). The GPU EIR concluded that even with implementation of the identified GPU EIR mitigation measures the following air quality impacts would remain significant and unavoidable: conflict with the SCAQMD Air Quality Management Plan (AQMP) due to criteria pollutant emissions during construction and operation; exceedance of the established SCAQMD emissions thresholds resulting in a cumulatively considerable net increase in emissions of a criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard; and potential exposure of sensitive receptors to toxic air contaminants (TACs) due to development of residential uses within areas that are adjacent to highways and freeways with 100,000 or more vehicles per day.

The GPU EIR also concluded that new development adjacent to heavily traveled streets or intersections would not expose sensitive receptors to substantial pollutant concentrations associated with carbon monoxide hot spots; construction activities would not exceed the SCAQMD localized significance thresholds (LSTs) or expose sensitive receptors to toxic air emissions; and implementing projects would not result in the construction or operation of a stationary source of TACs, which are regulated by the SCAQMD through permitting and monitoring requirements. Impacts related to odor emissions were also determined to be less than significant.

The proposed Project includes the development of 2,400 residential units that are allocated to a portion of Focus Area 2 under the approved General Plan and Zoning Ordinance. In addition to these residential uses, the proposed Project also includes the development of a public nature park and trail system, a K-6 elementary school site, neighborhood parks, and on- and off-site circulation and utility infrastructure improvements. Analysis of the proposed Project's potential impacts related to air quality will be provided in the forthcoming Draft SEIR.

V.4 Biological Resources

Issue	Additional Analysis Required	Less than Significant Impact or Less than Significant Impact with Incorporation of Previously Adopted GPU EIR MMs and PPPs	No Impact
IV. BIOLOGICAL RESOURCES: Compared to the assumptions, analysis, and conclusions presented in the GPU EIR, would the proposed Project (compared to the approved General Plan and Zoning Ordinance amendments):			

Issue	Additional Analysis Required	Less than Significant Impact or Less than Significant Impact with Incorporation of Previously Adopted GPU EIR MMs and PPPs	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☒	☐	☐
c) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☒	☐	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☒	☐	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☒	☐	☐

- a) ***Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?***
- b) ***Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?***
- c) ***Would the Project have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?***
- d) ***Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?***

- e) ***Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?***
- f) ***Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?***

Additional Analysis Required. The GPU EIR evaluated impacts to biological resources associated with development of 57,656 new dwelling units Citywide with 26,607 residential units within Focus Area 2. Of those Focus Area 2 units, the GPU EIR evaluated 4,907 units as being located within a portion of PA 12 (Oak Creek). The GPU EIR concluded that impacts to biological resources would be less than significant with the implementation of the identified GPU EIR MMs and PPPs (identifying regulations for the protection of biological resources).

The proposed Project includes the development of 2,400 residential units that are allocated to a portion of Focus Area 2 under the approved General Plan and Zoning Ordinance. In addition to these residential uses, the proposed Project also includes the development of a public nature park and trail system, a K-6 elementary school site, neighborhood parks, and on- and off-site circulation and utility infrastructure improvements. Analysis of potential impacts to biological resources resulting from development within the Project site and off-site improvement areas will be provided in the forthcoming Draft SEIR.

V.5 Cultural Resources

SUMMARY OF PREVIOUS ENVIRONMENTAL ANALYSIS

The analysis of cultural resources impacts resulting from implementation of the approved General Plan and Zoning Ordinance amendments is provided in Section 4.4 of the GPU EIR. The GPU EIR concluded that:

- Future development implementing the approved General Plan and Zoning Ordinance amendments, both within the Focus Areas and outside of those areas, may have the potential to impact a historic resource. The GPU EIR identified historic resources within Focus Area 2. Although future projects that would potentially impact historic resources would be required to comply with the National Historic Preservation Act (NHPA) and CEQA, and mitigation to reduce impacts to historic resources would be required, impacts would be significant and unavoidable. The City, therefore, adopted a Statement of Overriding Considerations for this impact in connection with its certification of the GPU EIR.
- Future development implementing the approved General Plan and Zoning Ordinance amendments would primarily be in urbanized areas that have previously been disturbed and therefore are unlikely to possess native soil with buried prehistoric resources. Additionally, future development would be required to adhere to Sec. 3-4-132 of the City's Municipal Code and applicable state laws, which prohibit the destruction of cultural resources (GPU EIR PPPs CUL-4). Similarly, Irvine Standard Condition 2.5 requires an archaeological monitoring report be prepared prior to grading permit issuance for projects that are located on land that includes potentially significant archeological resources (GPU EIR PPP CUL-5). Nonetheless, construction of future implementing projects would have the potential to unearth unknown cultural resources, particularly within areas that have been categorized as having a high sensitivity for cultural resources, and mitigation would

be required. With implementation of GPU EIR MM CUL-2, which requires a cultural resources assessment and/or full-time monitoring for projects proposing ground disturbing activities, impacts to archaeological resources were determined to be less than significant.

- There are no known burial sites or cemeteries within the Focus Areas or any other locations within the City. However, future development implementing the approved General Plan and Zoning Ordinance amendments could disturb native soils and therefore could have the potential to encounter human remains, especially within areas that have been categorized as having a high sensitivity for cultural resources. Therefore, although considered unlikely, implementing projects would have the potential to impact human remains. However, all development in the City must comply with all applicable laws related to the discovery of human remains. Impacts to human remains were determined to be less than significant.

Applicable GPU EIR MMs and PPPs

GPU EIR MM CUL-1 and PPP CUL-1 are not applicable to the proposed Project as no buildings with historic status would be demolished. The following GPU EIR MMs and PPPs related to cultural resources are applicable to the proposed Project.

MM CUL-2	Prior to project approval or the issuance of grading permits (whichever is applicable and comes first), the City of Irvine Director of Community Development, or designee, acting in a similar capacity shall require applicants for future proposed ground disturbing projects to either (1) provide a technical cultural resources assessment consisting of a record search, survey, background context and project specific recommendations performed by a qualified archaeologist meeting Secretary of the Interior Standards and certified by the County of Orange or (2) agree to full-time monitoring by an archaeologist and a designated representative from the tribe/group(s) who is culturally linked to the site. If resources are known or reasonably anticipated, the applicant shall be required to provide and follow a detailed mitigation plan which shall require monitoring during grading and other earthmoving activities in undisturbed sediments. The plan will provide a treatment plan for potential resources that includes data to be collected, requires professional identification, other special studies as appropriate, and requires curation at a repository for artifacts meeting significance criteria. A comprehensive final mitigation compliance report including a catalog of specimens with museum numbers and an appendix containing a letter from the museum stating that they are in possession of the materials shall be required and shall be submitted to the City.
PPP CUL-2	Compliance with CEQA
PPP CUL-4	Compliance with Municipal Code Sections 3-4-132 (Protection of Natural, Cultural, Structural and Archaeological Resources) and 9-10-7 (Special Development Standards)
PPP CUL-5	Compliance with Irvine Standard Condition 2.5 (Archaeologist/Paleontologist and Construction Monitoring)
PPP CUL-6	Compliance with California Health and Safety Code Sections 7050.5, 7051, and 7054

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Issue	Additional Analysis Required	Less than Significant Impact or Less than Significant Impact with Incorporation of Previously Adopted GPU EIR MMs and PPPs	No Impact
V. CULTURAL RESOURCES: Compared to the assumptions, analysis, and conclusions presented in the GPU EIR, would the proposed Project (compared to the approved General Plan and Zoning Ordinance amendments):			
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐

a) *Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*

No Impact. Existing structures within the Project site and off-site improvement areas are limited to buildings within the Oak Creek Golf Course and the Oak Creek Business Center, and the Manassero Farms farmstand (located on the City-owned property at the intersection of Progress and Jeffrey Road). The existing railroad bisects the Project site. With implementation of the proposed Project, the existing golf course and Oak Creek Business Center structures would be removed. The Manassero Farms farmstand and railroad would be retained.

As identified in GPU EIR Figure 4.4-1, Historic Resources, the existing railroad and “Old Town Irvine” are identified as “historic resources” within Focus Area 2. The railroad is a segment of the Burlington Northern & Santa Fe (BNSF) Railway originally constructed in the 1880s that has been continuously updated as it remains an operational line (operated by OCTA/Metrolink). Based on the records search conducted for the proposed Project at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton (included in Attachment B of this Initial Study), the segment of the railroad that traverses the Project site is not eligible for listing on the National Register of Historic Places (NRHP) or California Register of Historic Resources (CRHR) (LSA, 2026). Therefore, this segment of the railroad is not a historic resource pursuant to CEQA Guidelines Section 15064.5 and no impact would occur.

As shown on GPU EIR Figure 4.4-1, Historic Resources, Old Town Irvine includes multiple structures within Focus Area 2 located east and west of Sand Canyon Avenue adjacent to the north side of the railroad, and some structures outside Focus Area 2 (north of I-5). Based on the records search conducted for the proposed Project at the SCCIC at California State University (LSA, 2026), and consistent with information presented in the GPU EIR, Old Town Irvine is listed in the CRHR. However, there are no remaining historic structures associated with Old Town Irvine within the physical improvement areas for the proposed Project; remaining Old Town Irvine

structures within Focus Area 2 are located east of Sand Canyon Avenue and outside of the physical improvement areas associated with the proposed Project (LSA, 2026). Therefore, no impact to historic resources associated with Old Town Irvine would occur with implementation of the proposed Project.

The GPU EIR identifies that while the NRHP and CRHR indicate that a building must be 50 years or older to be listed under their designation, overall, structures 45 years or older are eligible to be considered historic resources. Existing structures at the golf course and Oak Creek Business Center that would be demolished to implement the proposed Project were constructed in the mid-1990s (approximately 30 years old), and would not be considered historic resources.

Therefore, there would be no impact to historic resources resulting from implementation of the proposed Project. The proposed Project would not result in any new or substantially more severe impacts to historic resources than those already identified, analyzed, and disclosed in the GPU EIR. No further analysis is required.

b) Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less than Significant Impact with Incorporation of Previously Adopted GPU EIR MMs and PPPs. As discussed previously, the Project site, which includes a portion of Focus Area 2, and the proposed off-site improvement areas, are developed or have otherwise been disturbed by previous development, construction activities, and agricultural activities. As identified in GPU EIR Figure 4.4-2, Prehistoric Resources, the Project site, off-site improvement areas, and surrounding areas, are entirely within an area identified as “Less Sensitive” related to the potential to encounter archaeological resources. There are no known archaeological resources within the Project site or off-site improvement areas (LSA, 2026).

Although there are no known archaeological resources within the Project site or off-site improvement areas, as identified in the GPU EIR there is a potential to disturb previously unknown subsurface archaeological resources during grading and excavation if grading activities extend into native sediments. The proposed Project would involve excavation in some locations that would encroach into native sediments. Therefore, the proposed Project would comply with GPU EIR MM CUL-2; the Project Applicant has agreed to full-time construction monitoring for cultural resources. In the event previously unknown resources are discovered during construction, required actions identified in GPU EIR MM CUL-2 (prepare and follow a detailed mitigation plan), PPP CUL-4 (comply with Irvine Municipal Code sections protecting natural, cultural, structural and archaeological Resources and special development standards), and PPP CUL-5 (compliance with Irvine Standard Condition 2.5, which addresses the protection of archaeological sites) would be completed. Consistent with the conclusion of GPU EIR, with implementation of the GPU EIR MM CUL-2 and the GPU EIR PPPs, impacts to archaeological resources would be less than significant.

Implementation of the identified GPU EIR MMs and PPPs would reduce potential impacts to previously undiscovered archaeological resources to a less than significant level. The proposed Project would not result in any new or substantially more severe impacts to archaeological resources than those already identified, analyzed, and disclosed in the GPU EIR. No further analysis is required.

Potential impacts related to tribal cultural resources will be evaluated in the forthcoming Draft SEIR as discussed in Section V.18, Tribal Cultural Resources, of this Initial Study.

- c) ***Would the Project disturb any human remains, including those interred outside of formal cemeteries?***

Less than Significant Impact with Incorporation of Previously Adopted GPU EIR MMs and PPPs. As discussed above, the Project site and off-site improvement areas have been disturbed by previous development, construction activities, and agricultural activities. Consistent with the analysis provided in the GPU EIR, unknown subsurface human remains may exist within the Project site or off-site improvement areas. However, the proposed Project would be implemented in compliance with all applicable laws related to the discovery of human remains, including but not limited to Health and Safety Code Section 7050.5 (GPU EIR PPP CUL-6) and Public Safety Code Section 5097.98 (GPU EIR PPP CUL-7). The proposed Project would also be required to comply with the City's Municipal Code and Irvine Standard Condition 2.5 to further avoid impacts related to the discovery of human remains (GPU EIR PPPs CUL-4 and CUL-5). With implementation of GPU EIR MMs and PPPs, the proposed Project's impact to human remains would be less than significant. The proposed Project would not result in any new or substantially more severe impacts related to disturbance of human remains than those already identified, analyzed, and disclosed in the GPU EIR. No further analysis is required.

V.6 Energy

Issue	Additional Analysis Required	Less than Significant Impact or Less than Significant Impact with Incorporation of Previously Adopted GPU EIR MMs and PPPs	No Impact
VI. <u>ENERGY:</u> Compared to the assumptions, analysis, and conclusions presented in the GPU EIR, would the proposed Project (compared to the approved General Plan and Zoning Ordinance amendments):			
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?	☒	☐	☐
b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	☒	☐	☐

- a) ***Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?***
- b) ***Would the Project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?***

Additional Analysis Required. The analysis of energy impacts resulting from implementation of the approved General Plan and Zoning Ordinance amendments is provided in Chapter 6.0, Effects Found Not to be Significant, of the GPU EIR. The GPU EIR evaluated impacts related to energy associated with development of 57,656 new dwelling units Citywide with 26,607 residential units within Focus Area 2. Of those Focus Area 2 units, the GPU EIR evaluated 4,907 units as being located within a portion of PA 12 (Oak Creek). The GPU EIR concluded that implementation of the approved General Plan and Zoning Ordinance amendments would not result in a wasteful, inefficient, or unnecessary consumption of electricity and natural gas, nor conflict with or obstruct

a state or local plan for renewable energy or energy efficiency, and impacts would be less than significant.

The proposed Project includes the development of 2,400 residential units that are allocated to a portion of Focus Area 2 under the approved General Plan and Zoning Ordinance. In addition to these residential uses, the proposed Project also includes the development of a public nature park and trail system, a K-6 elementary school site, neighborhood parks, and on- and off-site circulation and utility infrastructure improvements. Analysis of the proposed Project's potential impacts related to energy will be provided in the forthcoming Draft SEIR.

V.7 Geology and Soils

SUMMARY OF PREVIOUS ENVIRONMENTAL ANALYSIS

The analysis of impacts to paleontological resources resulting from implementation of the approved General Plan and Zoning Ordinance amendments is provided in Section 4.5, Geology and Soils, of the GPU EIR. Relevant to the analysis of impacts to paleontological resources presented below, the GPU EIR concluded that:

- Future development implementing the approved GPU and Zoning Ordinance amendments within areas with high and moderate sensitivity for paleontological resources would have the potential to disturb native soils and, therefore, may impact paleontological resources. Despite compliance with GPU EIR PPP GEO-10 (City Standard of Condition 2.5), the GPU EIR concluded that impacts would remain potentially significant and mitigation requiring a site-specific paleontological assessment and/or monitoring for all soils below 5 feet would be required (GPU EIR MM GEO-1). The GPU EIR concluded that implementation of GPU EIR MM GEO-1 could reduce impacts to paleontological resources to a level considered less than significant; however, as no specific development projects were identified, it was not possible to ensure that every implementing project could fully mitigate potentially significant impacts. Therefore, impacts to paleontological resources were determined to be significant and unavoidable. The City, therefore, adopted a Statement of Overriding Considerations for this impact in connection with its certification of the GPU EIR.

Applicable GPU EIR MMs and PPPs

The following GPU EIR MM and PPP related to paleontological resources are applicable to the proposed Project.

- MM GEO-1 Prior to issuance of grading permits, applicants for future proposed ground disturbing projects in undisturbed sediments ranked moderate or above shall be required to either (1) provide a technical paleontological assessment consisting of a record search, survey, background context and project specific recommendations performed by a qualified paleontologist (with a graduate degree and a specialization in vertebrate paleontology) to the City of Irvine Department of Community Development or (2) agree to monitoring all excavations below five feet. If resources are known or reasonably anticipated the recommendations shall provide a detailed mitigation plan requiring monitoring during grading and other earthmoving activities in undisturbed sediments. The plan will establish a fossil recovery protocol that includes data to be collected, requires professional identification, radiocarbon dates and other special studies as appropriate, requires curation at local curation facility such as the John D. Cooper Center operated by

the County of Orange for fossils meeting significance criteria. A comprehensive final mitigation compliance report including a catalog of fossil specimens with museum numbers and an appendix containing a letter from the museum stating that they are in possession of the fossils shall be required.

PPP GEO-10 Compliance with Irvine Standard Condition 2.5 (Archaeologist/Paleontologist and Construction Monitoring)

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Issue	Additional Analysis Required	Less than Significant Impact or Less than Significant Impact with Incorporation of Previously Adopted GPU EIR MMs and PPPs	No Impact
VII. GEOLOGY AND SOILS: Compared to the assumptions, analysis, and conclusions presented in the GPU EIR, would the proposed Project (compared to the approved General Plan and Zoning Ordinance amendments):			
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. ii. Strong seismic ground shaking? iii. Seismic-related ground failure, including liquefaction? iv. Landslides?	☒	☐	☐
b) Result in substantial soil erosion or the loss of topsoil?	☒	☐	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☒	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☒	☐	☐
e) Have soils incapable of adequately supporting the use septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☒	☐	☐
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐

a) ***Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:***

- i. ***Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.***
- ii. ***Strong seismic ground shaking?***
- iii. ***Seismic-related ground failure, including liquefaction?***
- iv. ***Landslides?***
- b) ***Would the Project result in substantial soil erosion or the loss of topsoil?***
- c) ***Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?***
- d) ***Would the Project be located on expansive soil, as defined in Table 18- 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?***
- e) ***Would the Project have soils incapable of adequately supporting the use septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?***

Additional Analysis Required. The GPU EIR evaluated impacts related to geology and soils associated with development of 57,656 new dwelling units Citywide with 26,607 residential units within Focus Area 2. Of those Focus Area 2 units, the GPU EIR evaluated 4,907 units as being located within a portion of PA 12 (Oak Creek). The GPU EIR concluded that with adherence to applicable regulations, including those identified in the GPU EIR PPPs, impacts related to seismicity, location on unstable soils and/or expansive soils, and soil erosion would be less than significant. The GPU EIR also identified that there would be no impact due to the use of septic tanks or alternative wastewater disposal systems because future development would connect to the municipal sewer system.

The proposed Project includes the development of 2,400 residential units that are allocated to a portion of Focus Area 2 under the approved General Plan and Zoning Ordinance. In addition to these residential uses, the proposed Project also includes the development of a public nature park and trail system, a K-6 elementary school site, neighborhood parks, and on- and off-site circulation and utility infrastructure improvements. Analysis of the proposed Project's potential impacts related to geology and soils for the thresholds of significance above will be provided in the forthcoming Draft SEIR.

- f) ***Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?***

Less than Significant Impact with Incorporation of Previously Adopted GPU EIR MMs and PPPs. As discussed previously, the Project site, which includes a portion of Focus Area 2, and the proposed off-site improvement areas, are developed or have otherwise been disturbed by previous development, construction activities, and agricultural activities. Figure 4.5-3, Paleontological Sensitivity, of the GPU EIR, shows that the Project site and off-site improvement areas are within an area identified as having moderate paleontological sensitivity. The proposed Project would involve excavation in some locations to depths up to 25 feet. As required, the proposed Project would be implemented in accordance with PPP GEO-10 (compliance with Irvine

Standard Condition 2.5, which addresses the protection of paleontological resources), and would comply with GPU EIR MM GEO-1 because excavation would exceed 5 feet. As identified in GPU EIR MM GEO-1, the Project would implement full-time construction monitoring for paleontological resources for excavations below five feet. In the event previously unknown resources are discovered during construction, required actions identified in GPU EIR MM GEO-1 would be completed (prepare and follow a detailed mitigation plan, which identifies actions to take if resources are discovered). With adherence to recommendations for protection of paleontological resources identified in a site-specific mitigation plan as required by the GPU EIR MM GEO-1, should such resources be encountered during construction, impacts to paleontological resources would be less than significant. The proposed Project would not result in any new or substantially more severe impacts to paleontological resources than those already identified, analyzed, and disclosed in the GPU EIR. No further analysis is required.

V.8 Greenhouse Gas Emissions

Issue	Additional Analysis Required	Less than Significant Impact or Less than Significant Impact with Incorporation of Previously Adopted GPU EIR MMs and PPPs	No Impact
VIII. GREENHOUSE GAS EMISSIONS: Compared to the assumptions, analysis, and conclusions presented in the GPU EIR, would the proposed Project (compared to the approved General Plan and Zoning Ordinance amendments):			
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐

- a) ***Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?***
- b) ***Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?***

Additional Analysis Required. The GPU EIR evaluated GHG emissions impacts associated with development of 57,656 new dwelling units Citywide with 26,607 residential units within Focus Area 2. Of those Focus Area 2 units, the GPU EIR evaluated 4,907 units as being located within a portion of PA 12 (Oak Creek). The GPU EIR concluded that even with implementation of the identified GPU EIR MMs and PPPs, GHG emissions impacts related to exceedance of the SCAQMD thresholds and potential conflict with an applicable plan, policy or regulation for the purposes of reducing GHG emissions would be significant and unavoidable.

The proposed Project includes the development of 2,400 residential units that are allocated to a portion of Focus Area 2 under the approved General Plan and Zoning Ordinance. In addition to these residential uses, the proposed Project also includes the development of a public nature park and trail system, a K-6 elementary school site, neighborhood parks, and on- and off-site circulation and utility infrastructure improvements. Analysis of the proposed Project's potential impacts related to GHG emissions will be provided in the forthcoming Draft SEIR.

V.9 Hazards and Hazardous Materials

Issue	Additional Analysis Required	Less than Significant Impact or Less than Significant Impact with Incorporation of Previously Adopted GPU EIR MMs and PPPs	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS: Compared to the assumptions, analysis, and conclusions presented in the GPU EIR, would the proposed Project (compared to the approved General Plan and Zoning Ordinance amendments):			
a) Create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials?	☒	☐	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☒	☐	☐
d) Be located on a site which is included on a list of hazardous materials sites which complied pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☒	☐	☐
e) For a project within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☒	☐	☐
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☒	☐	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☒	☐	☐

- a) ***Would the Project create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials?***
- b) ***Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?***
- c) ***Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?***
- d) ***Would the Project be located on a site which is included on a list of hazardous materials sites which complied pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?***

- e) ***For a project within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the project area?***
- f) ***Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?***
- g) ***Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?***

Additional Analysis Required. The GPU EIR evaluated impacts related to hazards and hazardous materials associated with development of 57,656 new dwelling units Citywide with 26,607 residential units within Focus Area 2. Of those Focus Area 2 units, the GPU EIR evaluated 4,907 units as being located within a portion of PA 12 (Oak Creek). The GPU EIR concluded that with implementation of the identified GPU EIR PPPs, which require adherence to applicable regulations, potential impacts related to hazards and hazardous materials would be less than significant.

The proposed Project includes the development of 2,400 residential units that are allocated to a portion of Focus Area 2 under the approved General Plan and Zoning Ordinance. In addition to these residential uses, the proposed Project also includes the development of a public nature park and trail system, a K-6 elementary school site, neighborhood parks, and on- and off-site circulation and utility infrastructure improvements. Analysis of the proposed Project's potential impacts related to hazards and hazardous materials will be provided in the forthcoming Draft SEIR.

V.10 Hydrology and Water Quality

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Issue	Additional Analysis Required	Less than Significant Impact or Less than Significant Impact with Incorporation of Previously Adopted GPU EIR MMs and PPPs	No Impact
X. <u>HYDROLOGY AND WATER QUALITY:</u> Compared to the assumptions, analysis, and conclusions presented in the GPU EIR, would the proposed Project (compared to the approved General Plan and Zoning Ordinance amendments):			
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☒	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☒	☐	☐

Issue	Additional Analysis Required	Less than Significant Impact or Less than Significant Impact with Incorporation of Previously Adopted GPU EIR MMs and PPPs	No Impact
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: i. Result in substantial erosion or siltation on- or off-site; ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or iv. Impede or redirect flood flows?	☒	☐	☐
d) Result in flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?	☒	☐	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☒	☐	☐

- a) ***Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?***
- b) ***Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?***
- c) ***Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:***
- i. Result in substantial erosion or siltation on- or off-site;***
 - ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;***
 - iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or***
 - iv. Impede or redirect flood flows?***
- d) ***Would the Project result in flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?***

e) *Would the Project with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

Additional Analysis Required. The GPU EIR evaluated hydrology and water quality impacts associated with development of 57,656 new dwelling units Citywide with 26,607 residential units within Focus Area 2. Of those Focus Area 2 units, the GPU EIR evaluated 4,907 units as being located within a portion of PA 12 (Oak Creek). The GPU EIR concluded that with adherence to applicable regulations, including those identified in the GPU EIR PPPs, potential impacts related to hydrology and water quality would be less than significant.

The proposed Project includes the development of 2,400 residential units that are allocated to a portion of Focus Area 2 under the approved General Plan and Zoning Ordinance. In addition to these residential uses, the proposed Project also includes the development of a public nature park and trail system, a K-6 elementary school site, neighborhood parks, and on- and off-site circulation and utility infrastructure improvements. Analysis of the proposed Project's potential impacts related to hydrology and water quality will be provided in the forthcoming Draft SEIR.

V.11 Land Use and Planning

Issue	Additional Analysis Required	Less than Significant Impact or Less than Significant Impact with Incorporation of Previously Adopted GPU EIR MMs and PPPs	No Impact
XI. <u>LAND USE AND PLANNING:</u> Compared to the assumptions, analysis, and conclusions presented in the GPU EIR, would the proposed Project (compared to the approved General Plan and Zoning Ordinance amendments):			
a) Physically divide an established community?	☒	☐	☐
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☒	☐	☐

a) *Physically divide an established community?*

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

Additional Analysis Required. The GPU EIR evaluated land use and planning impacts associated with development of 57,656 new dwelling units Citywide with 26,607 residential units within Focus Area 2. Of those Focus Area 2 units, the GPU EIR evaluated 4,907 units as being located within a portion of PA 12 (Oak Creek). The GPU EIR concluded that implementation of the approved General Plan and Zoning Ordinance amendments would have a less than significant impact related to physically dividing an established community. Additionally, the GPU EIR concluded that with implementation of the identified GPU EIR PPPs, development pursuant to the approved General Plan and Zoning Ordinance would have a less than significant impact related to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

As previously discussed, the existing General Plan land use designations for the Project site are Research/Industrial, Preservation, and Recreation. The area designated Preservation encompasses a portion of the Oak Creek golf course, while the area designated Recreation encompasses the JOST area. These areas were identified for open space in the City Council-sponsored 1988 Initiative Resolution (88-1), entitled “An Initiative Resolution of the City of Irvine Directing the Amendment of the Conservation and Open Space Element and the Land Use Element of the Irvine General Plan,” which directed the City Council to take certain actions to implement its objective. The City subsequently amended the General Plan, implementing Initiative Resolution 88-1 and designating the existing Preservation and Recreation land use areas within PA 12.

The existing zoning for the Project site is: 5.4B General Industrial, 5.5H Medical and Science, 1.4 Preservation, and 1.5 Recreation. The proposed Project includes a General Plan amendment, zone change, and Development Agreement to establish a new PA 52. The proposed Project includes the development of 2,400 residential units that are allocated to a portion of Focus Area 2 under the approved 2045 General Plan and Zoning Ordinance amendments. In addition to these residential uses, the proposed Project also includes the development of a public nature park and trail system, a K-6 elementary school site, neighborhood parks, and on- and off-site circulation and utility infrastructure improvements.

Analysis of the proposed Project’s potential impacts related to land use and planning will be provided in the forthcoming Draft SEIR. This will include an evaluation of the proposed Project’s consistency with the City’s General Plan and applicable goals and policies, the City’s Zoning Ordinance, and other applicable local and regional land use plan, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect.

V.12 Mineral Resources

SUMMARY OF PREVIOUS ENVIRONMENTAL ANALYSIS

The analysis of mineral resources impacts resulting from implementation of the approved General Plan and Zoning Ordinance amendments is provided in Section 6.0, Effects Found Not to be Significant, of the GPU EIR. The GPU EIR identifies that there are no areas in the City that have been designated Mineral Resource Zone-2 or as regionally significant mineral deposits, and no areas that can be used for mineral resource extraction. The City currently has no known gas, oil, or geothermal fields; however, there are approximately 24 oil and gas wells in Irvine, which are capped and abandoned or currently inactive. Therefore, the GPU EIR concluded that no impact to mineral resources would occur with implementation of the approved General Plan and Zoning Ordinance amendments.

Applicable GPU EIR MMs and PPPs

There are no GPU EIR MMs and/or PPPs related to mineral resources.

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Issue	Additional Analysis Required	Less than Significant Impact or Less than Significant Impact with Incorporation of Previously Adopted GPU EIR MMs and PPPs	No Impact
XII. MINERAL RESOURCES: Compared to the assumptions, analysis, and conclusions presented in the GPU EIR, would the proposed Project (compared to the approved General Plan and Zoning Ordinance amendments):			
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☒

- a) ***Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?***
- b) ***Would the Project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?***

No Impact. As identified in the GPU EIR, there are no areas in the City, including the Project site or off-site improvement areas, that are designated Mineral Resource Zone-2 or as regionally significant mineral deposits, or that can be used for mineral extraction. Additionally, there are no oil or gas wells. There are no mineral resources within the Project site or off-site improvement areas; therefore, the proposed Project would not impact mineral resources. The proposed Project would not result in any new or substantially more severe impacts on mineral resources than those already identified, analyzed, and disclosed in the GPU EIR. No further analysis is required.

V.13 Noise

Issue	Additional Analysis Required	Less than Significant Impact or Less than Significant Impact with Incorporation of Previously Adopted GPU EIR MMs and PPPs	No Impact
XIII. NOISE: Compared to the assumptions, analysis, and conclusions presented in the GPU EIR, would the proposed Project (compared to the approved General Plan and Zoning Ordinance amendments):			
a) Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐
b) Generate excessive groundborne vibration or groundborne noise levels?	☒	☐	☐

Issue	Additional Analysis Required	Less than Significant Impact or Less than Significant Impact with Incorporation of Previously Adopted GPU EIR MMs and PPPs	No Impact
c) For a project located within the vicinity of a private airstrip or an airport land use land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?	☒	☐	☐

- a) ***Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?***
- b) ***Generate excessive groundborne vibration or groundborne noise levels?***
- c) ***For a project located within the vicinity of a private airstrip or an airport land use land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?***

Additional Analysis Required. The GPU EIR evaluated noise and vibration impacts associated with development of 57,656 new dwelling units Citywide with 26,607 residential units within Focus Area 2. Of those Focus Area 2 units, the GPU EIR evaluated 4,907 units as being located within a portion of PA 12 (Oak Creek). The GPU EIR concluded that the potential to expose existing noise-sensitive receptors to significant traffic-related increases in ambient noise levels, the potential to expose future development to noise levels in exceedance of interior or exterior noise standards, and the potential for construction-related vibration impacts to sensitive receptors would be significant and unavoidable. The GPU EIR concluded that with implementation of GPU EIR MMs and PPPs, the potential to expose future development to vibration from railroad operations would be less than significant.

The proposed Project includes the development of 2,400 residential units that are allocated to a portion of Focus Area 2 under the approved General Plan and Zoning Ordinance. In addition to these residential uses, the proposed Project also includes the development of a public nature park and trail system, a K-6 elementary school site, neighborhood parks, and on- and off-site circulation and utility infrastructure improvements. Analysis of the proposed Project's potential noise and vibration impacts will be provided in the forthcoming Draft SEIR.

V.14 Population and Housing

SUMMARY OF PREVIOUS ENVIRONMENTAL ANALYSIS

The analysis of population and housing impacts resulting from implementation of the approved General Plan and Zoning Ordinance amendments is provided in Section 4.11 of the GPU EIR. The GPU EIR concluded that:

- Approved General Plan and Zoning Ordinance amendments would serve as an important action towards implementing the Housing Element and the City's associated RHNA

allocation of 23,610 units. Because the housing assessment in the RHNA is determined by the Southern California Association of Governments (SCAG), future development implementing the approved General Plan and Zoning Ordinance amendments would accommodate increases in population based on SCAG's demographic projections (a 25 percent increase in population and 30 percent increase in housing by 2045). The GPU EIR also identified that development would be focused in areas already served by infrastructure. Therefore, the GPU EIR concluded that implementation of the approved General Plan and Zoning Ordinance amendments would accommodate planned growth projected by SCAG, would improve the City's jobs to housing balance with the development of additional residential units, and would not induce substantial unplanned population growth in an area, either directly or indirectly. Therefore, this impact was determined to be less than significant.

- Through the overall production of more housing and compliance with applicable laws related to the displacement of tenants, implementation of the approved General Plan and Zoning Ordinance amendments would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere, and impacts would be less than significant.

Applicable GPU EIR MMs and PPPs

There are no GPU EIR MMs or PPPs related to population and housing.

ENVIRONMENTAL REVIEW

Issue	Additional Analysis Required	Less than Significant Impact or Less than Significant Impact with Incorporation of Previously Adopted GPU EIR MMs and PPPs	No Impact
XIV. POPULATION AND HOUSING: Compared to the assumptions, analysis, and conclusions presented in the GPU EIR, would the proposed Project (compared to the approved General Plan and Zoning Ordinance amendments):			
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☒	☐
b) Displace substantial numbers of people or existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒

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

Less than Significant Impact. The proposed Project implements the approved General Plan and Zoning Ordinance amendments with the development of 2,400 of the 26,607 residential units that are part of the residential unit allocation for Focus Area 2 evaluated in the GPU EIR (4,907 of those units located within a portion of existing PA 12). Based on the average population

generation factor of 2.6 people per unit used in the GPU EIR, the proposed Project would generate approximately 6,270 residents. There would be no increase in the number of units in the City beyond that anticipated and evaluated in the GPU EIR, which is also the basis for the projections presented in the Demographic and Growth Forecast technical report for the City included in SCAG's adopted 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS, also referred to as Connect SoCal 2024).

The existing golf course employs approximately 66 individuals (24 full-time and 32 part-time positions). Golf course related employment would be eliminated with implementation of the proposed Project; however, it is estimated there would be approximately 187 new employment opportunities with the proposed Project (approximately 135 school site employees, approximately 40 employees associated with the multi-family housing component of the Project, and 12 employees associated with the nature park). According to SCAG's Connect SoCal 2024, the number of jobs within the City is projected to increase from approximately 282,600 in 2019, to approximately 322,500 in 2045, and approximately 338,700 in 2050 (an increase of approximately 56,100 jobs between 2019 and 2050) (SCAG, 2024). The net increase in employment opportunities resulting from the proposed Project (approximately 121 jobs) would be well within SCAG's employment projections for the City.

The Project proposes infrastructure improvements such as the extension of Oak Canyon between its existing terminus and Progress, and on-site utility infrastructure that would connect to existing utility infrastructure in the surrounding roadways. Consistent with the conclusion of the GPU EIR, the proposed infrastructure improvements would be sized to accommodate the proposed Project and would not include additional capacity to accommodate future development off site.

Therefore, the proposed Project would not directly or indirectly induce substantial unplanned population growth in the City from the proposed new residential units, or through the extension of roads or utility infrastructure. This impact would be less than significant, consistent with the conclusion of the GPU EIR. The Project would not result in any new or substantially more severe effects related to population and housing than those already identified, analyzed, and disclosed in the GPU EIR. No further analysis is required.

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

No Impact. There is no existing housing located within the Project site or off-site improvement areas. Therefore, implementation of the proposed Project would not displace people or housing, and no impact would occur. The proposed Project would not result in any new or substantially more severe effects related to housing than those already identified, analyzed, and disclosed in the GPU EIR. No further analysis is required.

V.15 Public Services

Issue	Additional Analysis Required	Less than Significant Impact or Less than Significant Impact with Incorporation of Previously Adopted GPU EIR MMs and PPPs	No Impact
XV. <u>PUBLIC SERVICES:</u> Compared to the assumptions, analysis, and conclusions presented in the GPU EIR, would the proposed Project (compared to the approved General Plan and Zoning Ordinance amendments) result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:			
a) Fire protection?	☒	☐	☐
b) Police protection?	☒	☐	☐
c) Schools?	☒	☐	☐
d) Parks?	☒	☐	☐
e) Other public facilities?	☒	☐	☐

Compared to the assumptions, analysis, and conclusions presented in the GPU EIR, would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:

- a) ***Fire protection?***
- b) ***Police protection?***
- c) ***Schools?***
- d) ***Parks?***
- e) ***Other public facilities?***

Additional Analysis Required. The GPU EIR evaluated impacts to public services associated with development of 57,656 new dwelling units Citywide with 26,607 residential units within Focus Area 2. Of those Focus Area 2 units, the GPU EIR evaluated 4,907 units as being located within a portion of PA 12 (Oak Creek). The GPU EIR concluded that implementation of the approved General Plan and Zoning Ordinance amendments, which would include compliance with regulations addressing public services (GPU EIR PPPs), would not result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities, and impacts would be less than significant.

The proposed Project includes the development of 2,400 residential units that are allocated to a portion of Focus Area 2 under the approved General Plan and Zoning Ordinance. In addition to these residential uses, the proposed Project also includes the development of a public nature park and trail system, a K-6 elementary school site, neighborhood parks, and on- and off-site circulation and utility infrastructure improvements. Analysis of the proposed Project's potential impacts related to public services will be provided in the forthcoming Draft SEIR.

V.16 Recreation

Issue	Additional Analysis Required	Less than Significant Impact or Less than Significant Impact with Incorporation of Previously Adopted GPU EIR MMs and PPPs	No Impact
XVI. RECREATION: Compared to the assumptions, analysis, and conclusions presented in the GPU EIR, would the proposed Project (compared to the approved General Plan and Zoning Ordinance amendments):			
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☒	☐	☐
b) Include recreational facilities or require the construction of or expansion of recreational facilities which might have an adverse physical effect on the environment?	☒	☐	☐

- a) ***Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?***
- b) ***Would the Project include recreational facilities or require the construction of or expansion of recreational facilities which might have an adverse physical effect on the environment?***

Additional Analysis Required. The GPU EIR evaluated impacts related to recreational facilities associated with development of 57,656 new dwelling units Citywide with 26,607 residential units within Focus Area 2. Of those Focus Area 2 units, the GPU EIR evaluated 4,907 units as being located within a portion of PA 12 (Oak Creek). The GPU EIR concluded that with adherence to applicable regulations (such as the City's parkland standards), and implementation of the approved General Plan and Zoning Ordinance amendments there would not be an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, and there would not be adverse physical effects on the environment caused by expansion or construction of recreational facilities, and impacts would be less than significant.

The proposed Project includes the development of 2,400 residential units that are allocated to a portion of Focus Area 2 under the approved General Plan and Zoning Ordinance. In addition to these residential uses, the proposed Project also includes the development of a public nature park and trail system, a K-6 elementary school site, neighborhood parks, and on- and off-site circulation and utility infrastructure improvements. Analysis of the proposed Project's potential impacts related to recreation, including impacts associated with construction and operation of the proposed public nature park and trail system and neighborhood parks, will be provided in the forthcoming Draft SEIR.

V.17 Transportation

Issue	Additional Analysis Required	Less than Significant Impact or Less than Significant Impact with Incorporation of Previously Adopted GPU EIR MMs and PPPs	No Impact
XVII. <u>TRANSPORTATION</u>: Compared to the assumptions, analysis, and conclusions presented in the GPU EIR, would the proposed Project (compared to the approved General Plan and Zoning Ordinance amendments):			
a) Conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☒	☐	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☒	☐	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☒	☐	☐
d) Result in inadequate emergency access?	☒	☐	☐

- a) ***Would the Project conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?***
- b) ***Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?***
- c) ***Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?***
- d) ***Result in inadequate emergency access?***

Additional Analysis Required. The GPU EIR evaluated transportation-related impacts associated with development of 57,656 new dwelling units Citywide with 26,607 residential units within Focus Area 2. Of those Focus Area 2 units, the GPU EIR evaluated 4,907 units as being located within a portion of PA 12 (Oak Creek). The GPU EIR concluded that implementation of the approved General Plan and Zoning Ordinance amendments would have a less than significant impact related to conflict with an applicable program, plan, ordinance, or policy addressing the circulation system. With implementation of identified GPU EIR PPPs it was also concluded that impacts related to increased hazards and emergency access would be less than significant. The GPU EIR also concluded that implementation of the GPU EIR MMs would potentially reduce Vehicle Miles Travelled (VMT) impacts to a less than significant level. However, as no specific development projects were identified when the GPU EIR was prepared, the GPU EIR identified VMT impacts as significant and unavoidable due to the programmatic nature of the analysis and the inability to evaluate project-specific mitigation effectiveness at that stage. Therefore, impacts related to VMT were determined to be significant and unavoidable at a program level.

The proposed Project includes the development of 2,400 residential units that are allocated to a portion of Focus Area 2 under the approved General Plan and Zoning Ordinance. In addition to these residential uses, the proposed Project also includes the development of a public nature

park and trail system, a K-6 elementary school site, neighborhood parks, and on- and off-site circulation and utility infrastructure improvements. Analysis of the proposed Project's potential transportation-related impacts will be provided in the forthcoming Draft SEIR.

V.18 Tribal Cultural Resources

Issue	Additional Analysis Required	Less than Significant Impact or Less than Significant Impact with Incorporation of Previously Adopted GPU EIR MMs and PPPs	No Impact
XVIII. TRIBAL CULTURAL RESOURCES: Compared to the assumptions, analysis, and conclusions presented in the GPU EIR, would the proposed Project (compared to the approved General Plan and Zoning Ordinance amendments) cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:			
a) Listed or eligible for listing in the California Register of Historical resources or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	☒	☐	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying for the criteria set forth in (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☒	☐	☐

Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- a) Listed or eligible for listing in the California Register of Historical resources or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?***
- b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying for the criteria set forth in (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?***

Additional Analysis Required. The GPU EIR evaluated tribal cultural resources impacts associated with development of 57,656 new dwelling units Citywide with 26,607 residential units within Focus Area 2. Of those Focus Area 2 units, the GPU EIR evaluated 4,907 units as being located within a portion of PA 12 (Oak Creek). The GPU EIR identified that future development implementing the General Plan and Zoning Ordinance amendments would have the potential to unearth unknown tribal cultural resources. With implementation of the identified GPU EIR MMs

and PPPs, impacts were determined to be less than significant. The City will conduct the required Native American consultation pursuant to AB 52 and SB 18.

The proposed Project includes the development of 2,400 residential units that are allocated to a portion of Focus Area 2 under the approved General Plan and Zoning Ordinance. In addition to these residential uses, the proposed Project also includes the development of a public nature park and trail system, a K-6 elementary school site, neighborhood parks, and on- and off-site circulation and utility infrastructure improvements. Analysis of the proposed Project's potential impacts to tribal cultural resources will be provided in the forthcoming Draft SEIR.

V.19 Utilities & Service Systems

Issue	Additional Analysis Required	Less than Significant Impact or Less than Significant Impact with Incorporation of Previously Adopted GPU EIR MMs and PPPs	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS: Compared to the assumptions, analysis, and conclusions presented in the GPU EIR, would the proposed Project (compared to the approved General Plan and Zoning Ordinance amendments):			
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☒	☐	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☒	☐	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?	☒	☐	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☒	☐	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☒	☐	☐

- a) ***Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?***
- b) ***Would the Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?***

- c) ***Would the Project result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?***
- d) ***Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?***
- e) ***Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?***

Additional Analysis Required. The GPU EIR evaluated impacts related to utilities and service systems associated with development of 57,656 new dwelling units Citywide with 26,607 residential units within Focus Area 2. Of those Focus Area 2 units, the GPU EIR evaluated 4,907 units as being located within a portion of PA 12 (Oak Creek). The GPU EIR concluded that with adherence to applicable regulations, including those identified in the GPU EIR PPPs, impacts related to utilities and service systems would be less than significant.

The proposed Project includes the development of 2,400 residential units that are allocated to a portion of Focus Area 2 under the approved General Plan and Zoning Ordinance. In addition to these residential uses, the proposed Project also includes the development of a public nature park and trail system, a K-6 elementary school site, neighborhood parks, and on- and off-site circulation and utility infrastructure improvements. The forthcoming Draft SEIR will identify project-specific utility infrastructure required to serve the proposed uses and will include an analysis of the proposed Project's potential impacts related to utilities and service systems.

V.20 Wildfire

SUMMARY OF PREVIOUS ENVIRONMENTAL ANALYSIS

The analysis of wildfire impacts resulting from implementation of the approved General Plan and Zoning Ordinance amendments is provided in Section 4.15 of the GPU EIR. The GPU EIR identified that the majority of the City lies within a wide, level valley bordered by the Santa Ana Mountains and San Joaquin Hills, characterized by predominantly urbanized areas devoid of fire-prone vegetation. However, the northern and southern areas of the City feature canyons, ridges, and hillsides with vegetation highly susceptible to ignition. Approximately 11,915 acres of these natural, undeveloped areas are classified as Very High Fire Hazard Severity Zones (VHFHSZ). With respect to the established Focus Areas, the GPU EIR identified that approximately 1,875 acres of land located in Focus Area 3 are classified as VHFHSZ and that there are no VHFHSZs within Focus Areas 1 or 2 (including the portion of the Project site within Focus Area 2). The GPU EIR concluded that with adherence to applicable regulations (GPU EIR PPPs), wildfire impacts related to future development implementing the approved General Plan and Zoning Ordinance amendments within VHFHSZ would be less than significant.

Applicable GPU EIR PPPs

The Project site and off-site improvement areas are not located in a VHFHSZ; therefore, GPU EIR PPPs Wildfire-1 through Wildfire-4 are not applicable to the proposed Project. GPU EIR PPP Wildfire-5 through PPP Wildfire-7 are not applicable to the proposed Project as the Project site and off-site improvement areas are not in a flood hazard area.

ENVIRONMENTAL REVIEW

Issue	Additional Analysis Required	Less than Significant Impact or Less than Significant Impact with Incorporation of Previously Adopted GPU EIR MMs and PPPs	No Impact
XX. WILDFIRE: If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, and compared to the assumptions, analysis, and conclusions presented in the GPU EIR, would the proposed Project (compared to the approved General Plan and Zoning Ordinance amendments):			
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒

If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the Project:

- a) Substantially impair an adopted emergency response plan or emergency evacuation plan?***
- b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?***
- c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?***
- d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?***

No Impact. The State Responsibility Area (SRA) referenced in this threshold is the land where the State of California is financially responsible for the prevention and suppression of wildfires. The SRA does not include lands within city boundaries or in federal ownership; therefore, the Project site, off-site improvement areas, and adjacent areas are not within an SRA. Based on review of the 2025 CAL FIRE updated Fire Hazard Severity Zone maps, and consistent with

information presented in the GPU EIR, the Project site and off-site improvement areas are not located in a VHFHSZ (CAL FIRE, 2025). Therefore, no wildfire impacts would result with implementation of the proposed Project. The proposed Project would not result in any new or substantially more severe impacts related to wildfires than those already identified, analyzed, and disclosed in the GPU EIR. No further analysis is required.

V.21 Mandatory Findings of Significance

Issue	Additional Analysis Required	Less than Significant Impact or Less than Significant Impact with Incorporation of Previously Adopted GPU EIR MMs and PPPs	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE:			
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects?)	☒	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐

- a) ***Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?***
- b) ***Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects?)***
- c) ***Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?***

Additional Analysis Required. The proposed Project includes the development of 2,400 residential units that are allocated to a portion of Focus Area 2 under the approved General Plan

and Zoning Ordinance. In addition to these residential uses, the proposed Project also includes the development of a public nature park and trail system, a K-6 elementary school site, neighborhood parks, and on- and off-site circulation and utility infrastructure improvements. Analysis of potential impacts related to mandatory findings of significance will be provided in the forthcoming SEIR.

SECTION VI. REFERENCES

- California Department of Conservation (DOC), 2022. *California Important Farmland Finder*. Available at: <https://maps.conservation.ca.gov/DLRP/CIFF/>.
- California Department of Forestry and Fire Protection (CAL FIRE), 2025. *Find your Fire Hazard Severity Zone (FHSZ) and local public contacts*. Available at: <https://experience.arcgis.com/experience/5065c998b4b0462f9ec3c6c226c610a9>.
- California Department of Transportation (Caltrans), 2026. *California State Scenic Highway System Map*. Available at: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>.
- LSA, 2026. *Cultural Resources Records Search Summary for the Planning Area 52 Project, Irvine, California (LSA Project No. 20252470)*. April 2026.
- Southern California Association of Governments (SCAG), 2024. *Connect SoCal 2024: Demographics & Growth Forecast*. Available at: <https://scag.ca.gov/sites/default/files/2024-05/23-2987-tr-demographics-growth-forecast-final-040424.pdf>.
- United States Census Bureau (USCB), 2023. *2020 Census: Urban Areas of the United States and Puerto Rico*. Available at: https://www2.census.gov/geo/maps/DC2020/UA20/UA_2020_WallMap.pdf.

SECTION VII. INITIAL STUDY PREPARERS AND CONTRIBUTORS

City of Irvine, Community Development Department

Alyssa Matheus, Planning Manager
Nick Melloni, Principal Planner
Eric Martin, Senior Planner

City CEQA Consultant

EPD Solutions, Terrance Smalls, Environmental Principal Planner

Project Applicant, Irvine Company

Irvine Company, Jonathan Bjorndahl, Vice President, Development & Forward Planning

Consultants

T&B Planning

Tina Andersen, Principal-in-Charge/Project Manager
Ashley McCoy, Environmental Analyst
Cristina Maxey, GIS/Graphics Specialist

ATTACHMENT A

PLANNING AREA 52 ASSESSOR PARCEL NUMBERS

APN

466-341-15

466-011-40

466-011-11

466-011-45

466-011-50

466-011-49

466-011-51

466-013-17

466-342-06

466-351-05

466-351-06

466-351-10

466-351-11

466-351-12

466-351-13

466-351-14

466-351-15

466-351-16

466-351-17

466-351-18

466-351-19

466-351-20

466-341-13

466-351-03

466-351-04

466-343-02

466-343-03

466-343-01

466-342-04

466-343-04

466-344-01

466-011-02

466-011-09

466-341-14

466-011-25



CARLSBAD
CLOVIS
EMERYVILLE
IRVINE
LOS ANGELES
PALM SPRINGS
RIVERSIDE
ROSEVILLE
SAN LUIS OBISPO

April 28, 2026

Jonathan Bjorndahl
Vice President, Development & Forward
Planning
Irvine Company
550 Newport Center Drive
Newport Beach, CA 92660

Subject: Cultural Resources Records Search Summary for the Planning Area 52 Project, Irvine, California (LSA Project No. 20252470)

Dear Mr. Bjorndahl:

It is LSA's understanding that consistent with mitigation measure (MM) CUL-2 included in the *City of Irvine 2045 General Plan Update Program Environmental Impact Report* (State Clearinghouse No. 2023070463) (GPU PEIR), certified by the City of Irvine on August 13, 2024 (GPU PEIR), and presented below, the Irvine Company has agreed to full-time construction monitoring by an archaeologist and a designated representative from the tribe/group(s) culturally linked to the site. Therefore, a technical cultural resources assessment is not required. This letter serves as a commitment by LSA to function as the retained qualified archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology.

MM CUL-2: *Prior to project approval or the issuance of grading permits (whichever is applicable and comes first), the City of Irvine Director of Community Development, or designee, acting in a similar capacity shall require applicants for future proposed ground disturbing projects to either (1) provide a technical cultural resources assessment consisting of a record search, survey, background context and project specific recommendations performed by a qualified archaeologist meeting Secretary of the Interior Standards and certified by the County of Orange or (2) agree to full-time monitoring by an archaeologist and a designated representative from the tribe/ group(s) who is culturally linked to the site. If resources are known or reasonably anticipated, the applicant shall be required to provide and follow a detailed mitigation plan which shall require monitoring during grading and other earthmoving activities in undisturbed sediments. The plan will provide a treatment plan for potential resources that includes data to be collected, requires professional identification, other special studies as appropriate, and requires curation at a repository for artifacts meeting significance criteria. A comprehensive final mitigation compliance report including a catalog of specimens with museum numbers and an appendix containing a letter from the museum stating that they are in possession of the materials shall be required and shall be submitted to the City.*

Pursuant to your request, LSA has also conducted a cultural resources record search for the proposed Planning Area (PA) 52 Project to support the City of Irvine's required Native American consultation process.

Project Location and Setting

The proposed Planning Area (PA) 52 Study Area (Study Area) for the cultural resources records search is generally bound by Jeffrey Road to the west, Interstate (I)-5 to the north, Valley Oak and Oak Canyon (roadways) and the existing Innovation Office Park to the east, and Irvine Center Drive to the south. The Study Area is currently developed primarily with the Oak Creek Golf Course and Oak Creek Business Center, which would be redeveloped as part of the proposed Project and also includes the undeveloped area west of the existing Innovation Office Park (such undeveloped area referred to herein as the "IOP Phases 3 and 4 site"). The Study Area also includes the northwest portion of the Irvine Valley College (IVC) campus and City-owned property along Jeffrey Road, which would be subject to Jeffrey Open Space Trail (JOST) improvements included as part of the proposed Project. Additionally, the Study Area is bisected by the Orange County Transportation Authority (OCTA)/Metrolink railroad. The Study Area is depicted on the United States Geological Survey *Newport Beach* 7.5-minute topographic map in Township 6 South, 10 West, Section 55 (see Figure 1, Appendix A).

METHODOLOGY

Record Search

On May 13th, 2025, LSA Archaeologist Aaron McCann conducted a cultural resources record search at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton. The SCCIC, an affiliate of the California Office of Historic Preservation (OHP), is the official repository of cultural resources records and reports for Orange County. The record search included a review of all previously documented prehistoric, historic-period, and cultural resource records within the Study Area and a 0.25-mile radius of the Study Area (records search buffer area), as well as a review of cultural resources reports in the database. As shown on Figure 1 on- and off-site improvements associated with the PA 52 Project would occur within the Study area and/or records search buffer area.

RESULTS

Record Search

Data retrieved from the record search shows that five resources have been identified within the Study Area (See Table A and Appendix B for full results). All five resources are built environment resources and date to the historic period. Four of the resources were previously assessed for listing on local, state or national registries of historic places, with only one (Old Town Irvine; P-30-161894) being deemed eligible for listing on the California Register of Historical Places (CRHR). The railroad (P-30-176663 and P-30-177722) which traverses the Study Area, follows the original alignment but has been modernized and holds no historic integrity. Therefore, it is ineligible for listing. With respect to Old Town Irvine, which is listed in the CRHR, the remaining buildings are on the east side of Sand Canyon Avenue and is not located within the physical impact area of the Project. No prehistoric cultural resources were identified within the Study Area.

Eight additional resources were identified within the records search buffer area (See Table B and Appendix B for full results). All eight resources consist of historic period, built environment

resources. The resources have been destroyed by previous construction or repurposed for modern use.

The record search results also show that 32 cultural resource studies have been conducted within some portion of the Study Area, and an additional 18 studies have been conducted within the records search buffer area (see Appendix B for detailed records search results).

Table A: Resources Found Within the Study Area

Primary #	OHP #	Site Description	Status Code
P-30-161873*		Historic building: "Worker's Cottage" built in 1914. Consists of a single floor cottage.	6Y
P-30-161875		Historic Building: "Irvine Garage" approximately constructed in 1923. Original use was auto repair and showroom consisting of single floor building on concrete foundation. Current use is as a restaurant.	6Y
P-30-161894	1004	Original town of Irvine now known as "Old Town Irvine" developed in 1887.	1CL
P-30-176663	—	Approx. 14.7-mile segment of the Burlington Northern & Sante Fe Railway. Originally constructed in the 1880s but has been continuously updated due to still being an operational line.	6Z
P-30-177722	—	0.6 Mile Segment of Burlington Northern & Sante Fe Railway. Originally constructed in 1887, the primary record notes the features of the railway have been replaced with modern materials.	—

Source: Compiled by LSA (2025).

OHP = State Office of Historic Preservation

*: No longer standing

1CL: State Historical Landmark (CHL) numbered 770 and above, or an earlier CHL reheard by the SHRC and determined that it also meets CRHR criteria. Listed in the CRHR.

6Y: Determined ineligible for the Natural Register of Historic Places (NRHP) by consensus through Section 106 process – Not evaluated for CRHR or local listing.

6Z: Found ineligible for NRHP, CRHR or local designation through survey evaluation.

Table B: Resources Found Within .25 Miles of Study Area

Primary #	OHP #	Site Description	Status Code
P-30-157788*	—	Historic building: "Irvine Blacksmith Shop" constructed in 1915-1916.	1S
P-30-161870*	—	Historic building: Originally "Worker's Cottage" constructed in 1904.	6Y
P-30-161871*	—	Historic building: Originally "Irvine Hotel" constructed in 1913.	—
P-30-161872*	—	Historic building: "Agricultural Storage Shed" est. to have been built in 1930. Consists of a single floor cottage with wood siding.	6Y
P-30-161874*	—	Historic building: "Worker's Cottage" built in 1900	6Y
P-30-161889*	—	Historic building: "Irvine Bean and Growers Association Building" first constructed in 1895 and added onto in 1947.	—
P-30-176838	—	Historic building: "Irvine Community Church" constructed in 1952. Consists of a single religious building and single-family property.	6Z
P-30-176945*	—	Historic building: "Irvine General Store" constructed in 1911. Moved from original location on 14951 Sand Canyon Avenue in 1986.	—

Source: Compiled by LSA (2025).

OHP = State Office of Historic Preservation

*: No longer standing

1S: Individually listed in the NRHP by the Keeper. Listed in the CRHR.

6Y: Determined ineligible for NRHP by consensus through Section 106 process – Not evaluated for CRHR or local listing.

6Z: Found ineligible for NRHP, CRHR or local designation through survey evaluation.

FINDINGS

Based upon the records search data and the disturbed nature of the Study Area, records search buffer area, and vicinity, sensitivity for in situ archaeological resources appears low. The resources documented in the area are historic, built environment resources, which were evaluated for historical significance. One resource within the Study Area (Old Town Irvine; P-30-161894) is listed on the CRHR but the buildings associated with this resource that remain are located east of Sand Canyon Avenue and are not located within the physical impact area for the Project.

If you have any questions regarding this information, please contact me at Aaron.McCann@lsa.net.

Sincerely,

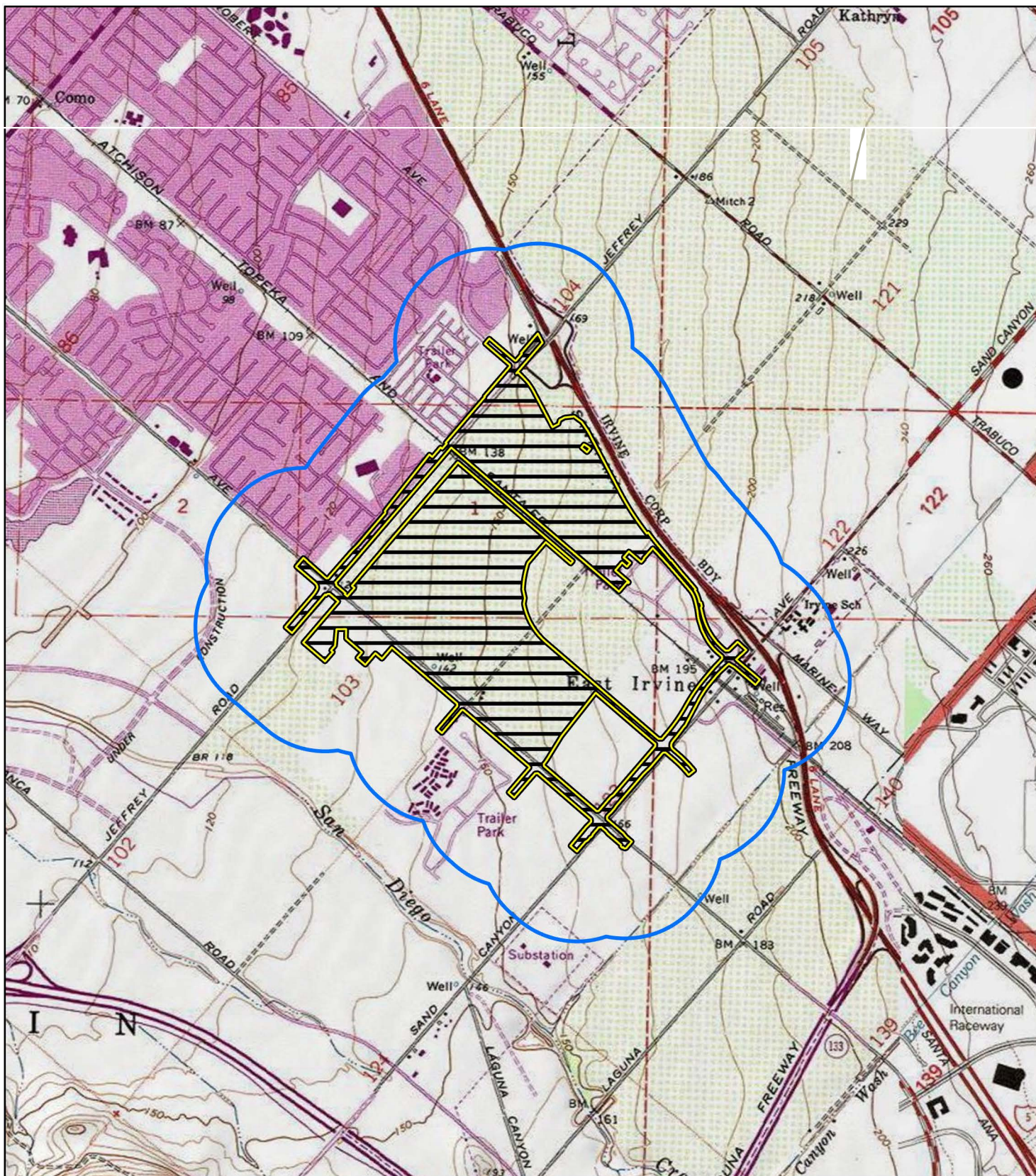
LSA Associates, Inc.



Aaron McCann
Archaeologist

Attachments: Appendix A- Records Search Map
Appendix B- Confidential Records Search Results

APPENDIX A – RECORDS SEARCH MAP



LSA

 Study Area

 0.25-Mile Buffer



1000 2000

FEET

SOURCE: USGS 7.5' Quad: *Tustin* (1981), *El Toro* (1982), CA

ICCD Planning Area 52
Records Search Map

APPENDIX B – RECORDS SEARCH RESULTS

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