January 2026 | Initial Study/Mitigated Negative Declaration

TUSTIN UNIFIED SCHOOL DISTRICT EDUCATION CENTER PROJECT

Tustin Unified School District

Prepared for:

Tustin Unified School District
Contact: Tom Rizzuti, Director, Facilities and Planning
300 S. C Street
Tustin, California 92780
714.730.7515

Prepared by:

PlaceWorks
Contact: Mariana Zimmermann, Associate Principal
3 MacArthur Place, Suite 1100
Santa Ana, California 92707
714.966.9220
mzimmermann@placeworks.com
www.placeworks.com

PLACEWORKS

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Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
ACM	asbestos-containing materials
ADT	average daily traffic
amsl	above mean sea level
ANSI	American National Standards Institute
APN	Assessor's Parcel Number
AQMP	air quality management plan
AST	aboveground storage tank
BAU	business as usual
bgs	below ground surface
BMP	best management practices
BRE	Biological Resources Evaluation
BSA	Biological Study Area
CAA	Clean Air Act
CAFE	corporate average fuel economy
CalARP	California Accidental Release Prevention Program
CalEEMod	California Emissions Estimator Model
CalEMA	California Emergency Management Agency
Cal/EPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
CalGEM	Geologic Energy Management Division
CALGreen	California Green Building Standards Code
Cal/OSHA	California Occupational Safety and Health Administration
CalRecycle	California Department of Resources, Recycling, and Recovery
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife

Abbreviations and Acronyms

CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
cfs	cubic feet per second
CFC	California Fire Code
CGP	Construction General Permit
CGS	California Geologic Survey
CH4	methane
CMP	congestion management program
CNDDB	California Natural Diversity Database
CNEL	community noise equivalent level
CNRA	California Natural Resources Agency
CO	carbon monoxide
CO2e	carbon dioxide equivalent
Corps	US Army Corps of Engineers
CRHR	California Register of Historical Resources
CSO	combined sewer overflows
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
dB	decibel
dBA	A-weighted decibel
DHS	State Department of Health Services
DOC	California Department of Conservation
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
DWR	California Department of Water Resources
EOP	Emergency Operations Plan
EIR	environmental impact report
EPA	United States Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
ESA	Environmental Site Assessment
ESL	environmental screening level
EV	electric vehicle
FEMA	Federal Emergency Management Agency

Abbreviations and Acronyms

FHSZ	fire hazard severity zone
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GHG	greenhouse gases
GWP	global warming potential
GWRS	Groundwater Replenishment System
HCM	Highway Capacity Manual
HHRA	Human Health Risk Assessment
HQTA	high quality transit area
HRA	health risk assessment
HVAC	heating, ventilating, and air conditioning system
ICU	intersection capacity utilization
ILE	Institution of Lighting Engineers
IPCC	Intergovernmental Panel on Climate Change
IPR	indirect potable reuse
IRWD	Irvine Ranch Water District
Ldn	day-night noise level
Leq	equivalent continuous noise level
LBP	lead-based paint
LCFS	low-carbon fuel standard
LCI	Governor's Office of Land Use and Climate Innovation
LOS	level of service
LRA	local responsibility area
LST	localized significance thresholds
MW	moment magnitude
MBTA	Migratory Bird Treaty Act
MCAS	Marine Corps Air Station
MCL	maximum contaminant level
MEP	maximum extent practicable
mgd	million gallons per day
MMT	million metric tons
MND	mitigated negative declaration
MPO	metropolitan planning organization

Abbreviations and Acronyms

MRZ	Mineral Resource Zones
MT	metric ton
MWD	Metropolitan Water District of Southern California
MWDOC	Municipal Water District of Orange County
NAHC	Native American Heritage Commission
ND	negative declaration
NHMLA	Natural History Museum of Los Angeles County
NOX	nitrogen oxides
NPS	National Parks Service
NPDES	National Pollution Discharge Elimination System
NRHP	National Register of Historic Places
O3	ozone
OCFA	Orange County Fire Authority
OCTA	Orange County Transit Authority
OCWD	Orange County Water District
OC SAN	Orange County Sanitation District
OEHHA	Office of Environmental Health Hazard Assessment
OES	California Office of Emergency Services
OHP	California Office of Historic Preservation
Pb	lead
PFAS	polyfluoroalkyl substances
PFOA	perfluorooctanoic acid
PFOS	perfluorooctanesulfonic acid
PM	particulate matter
POTW	publicly owned treatment works
ppm	parts per million
PPV	peak particle velocity
PRD	Permit Registration Documents
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental condition
RMP	risk management plan
RMS	root mean square
RPS	renewable portfolio standard

Abbreviations and Acronyms

RSL	Region Screening Level
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCCIC	South-Central Coastal Information Center
SF6	sulfur hexafluoride
SGMA	Sustainable Groundwater Management Act
SILVIS	Spatial Analysis For Conservation and Sustainability
SIP	state implementation plan
SLF	Sacred Lands File
SLM	sound level meter
SoCAB	South Coast Air Basin
SOX	sulfur oxides
SQMP	stormwater quality management plan
SRA	source receptor area [or state responsibility area]
SUSMP	standard urban stormwater mitigation plan
SWIS	Solid Waste Information System
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminants
TAZ	transportation analysis zone
TCR	tribal cultural resources
TNM	transportation noise model
TPD	Tustin Police Department
tpd	tons per day
TRI	toxic release inventory
TTCP	traditional tribal cultural places
TUSD	Tustin Unified School District
USACE	United States Army Corps of Engineers

Abbreviations and Acronyms

USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	underground storage tank
UWMP	urban water management plan
V/C	volume-to-capacity ratio
VdB	velocity decibels
VHFHSZ	very high fire hazard severity zone
VIMS	passive vapor intrusion mitigation system
VMT	vehicle miles traveled
VOC	volatile organic compound
WQMP	water quality management plan
WSA	water supply assessment
WUI	Wildlife Urban Interface

1. Introduction

In compliance with the California Environmental Quality Act (CEQA), the Tustin Unified School District (TUSD) is the applicant[1] and lead agency[2] for the proposed project. The TUSD, as lead agency, prepared the environmental documentation for the proposed project to determine if approval of the discretionary actions and subsequent development would have a significant impact on the environment. As defined by Section 15063 of the CEQA Guidelines, an initial study is prepared primarily to provide the lead agency with information to use as the basis for determining whether an environmental impact report, negative declaration (ND), or mitigated negative declaration (MND) would provide the necessary environmental documentation and clearance for the proposed project. This initial study has been prepared to support the adoption of an MND.

1.1 PROJECT LOCATION

1.1.1 Project Site Location

The project site is located at the west corner of the intersection of Legacy Road and Valencia Avenue (Assessor's Parcel Number [APN] 430-391-76) in the City of Tustin, Orange County. Specifically, the project site consists of approximately 8.51 acres.

The City of Tustin is surrounded by the cities of Orange and Irvine and unincorporated Orange County to the north, the cities of Santa Ana and Orange to the west, the city of Irvine to the south, and the cities of Irvine and Orange and unincorporated Orange County to the east. See Figure 1, *Regional Location*.

1.1.2 Regional and Local Vehicle Access

Interstate 5 (I-5), State Route 55 (SR-55), and State Route 261 (SR-261), which are 1.4 miles north, 1.3 miles west, and 0.84 mile southeast of the project site, respectively, provide regional access to the project site. See Figure 2, *Local Vicinity Map*. The Orange County Transit Authority (OCTA) administers bus service to the project site area. According to the OCTA, the nearest bus stop to the project site is located near the corner of Red Hill Avenue and Edinger Avenue, approximately 0.86-mile northwest of the project site, along OCTA Route 70, Sunset Beach to Tustin (OCTA 2025).

The nearest airport to the project site is John Wayne Airport, approximately 3.7 miles southwest of the project site. Direct train access is not provided to the project site. However, the nearest Metrolink station is approximately 0.9 mile east of the project site in the city of Tustin; the nearest Amtrak station, which serves

[1] CEQA Guidelines Section 15351 defines applicant as "a person who proposes to carry out a project which needs a lease, permit, license, certificate, or other entitlement for use or financial assistance from one or more public agencies when that person applies for the governmental approval or assistance."

[2] Public Resources Code Section 21067 defines lead agency as the "public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment."

the Pacific Surfliner route, is in the city of Santa Ana, which is approximately 3.46 miles northwest of the project site.

Locally, the project site is served by a local street grid that surrounds the project site. Direct vehicle access to the project site is provided by Legacy Road, which borders the project site to the south. Legacy Road runs northeast-southwest and consists of two lanes in each direction. A left-turn lane is provided in the eastbound direction at the intersection of Valencia Avenue and Legacy Road. Bicycle lanes are provided on both sides of each street. Sidewalks are included on the south side of the Legacy Road and most of the north side and on both sides of Valencia Avenue. The project site is fenced, with vehicle access limited to authorized personnel from one curb-cut driveway on the north side of Legacy Road. No pedestrian access is provided.

1.2 ENVIRONMENTAL SETTING

1.2.1 Existing Land Use

The approximately 8.51-acre project site is vacant and disturbed, with low lying vegetation and mostly flat conditions, with a gradual, east-to-west, downward slope in southern part of the project site. A chain-link fence encloses the project site. One access gate in the southern part of the project site allows authorized access to the project site from Legacy Road. See Figure 3, *Aerial Photograph with Photograph Locations*, and Figure 4, *On-Site and Surrounding Uses Photographs*.

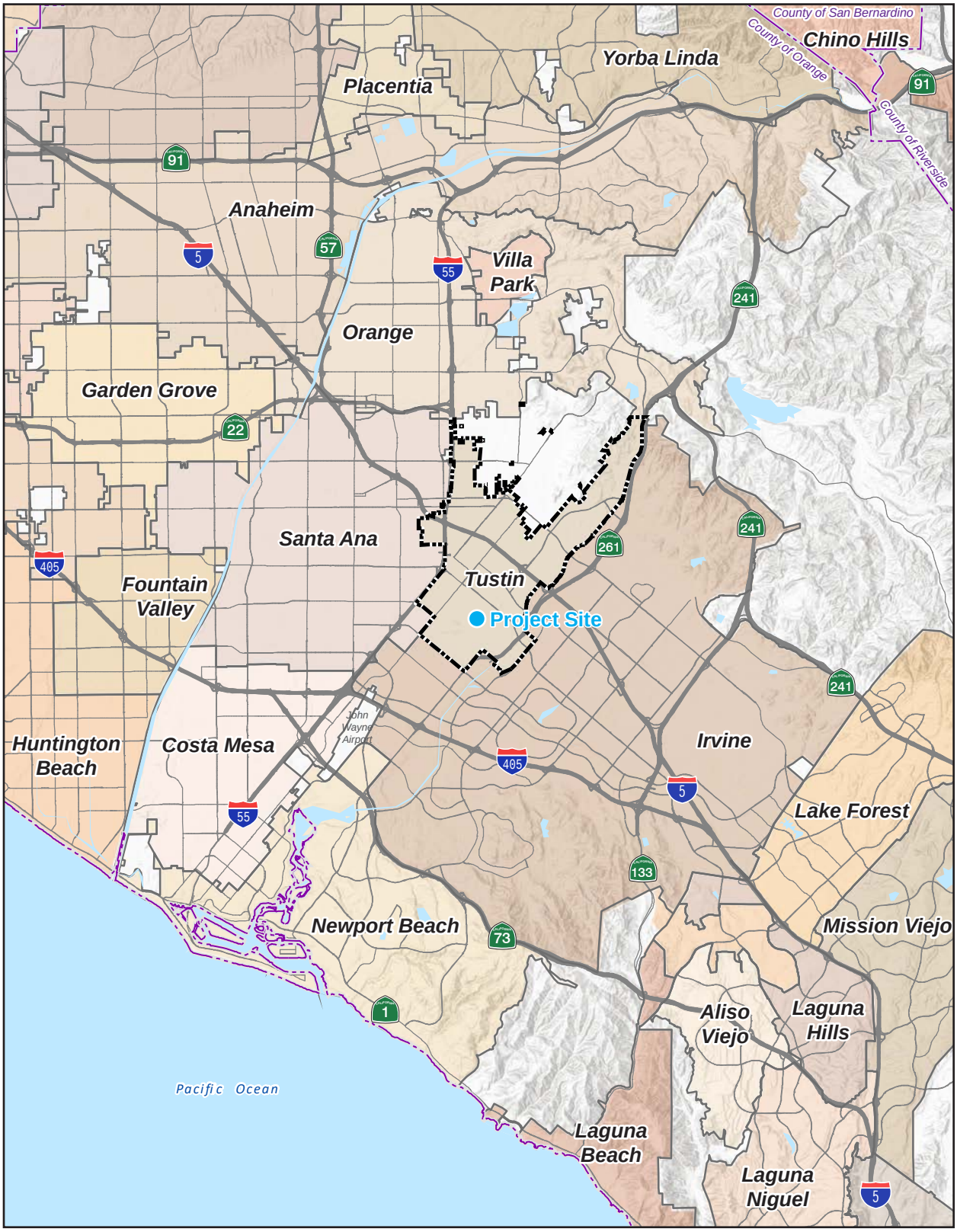
1.2.2 Surrounding Land Use

The Tustin Legacy Specific Plan area and the project site were historically developed with a Marine Corps Air Station (MCAS). Today, the project site is surrounded by vacant land and residential uses to the north; a decommissioned MCAS Tustin blimp hangar (which burned down in December 2023) and MCAS buildings to the west; vacant lands, a construction site, and the Legacy Magnet Academy to the south; and commercial uses to the east.

1.2.3 Existing General Plan Land Use and Zoning Designations

The project site is designated Tustin Legacy Specific Plan in the General Plan. This specific plan encompasses approximately 1,511 acres in Tustin and an additional 95 acres in Irvine. Its primary goal is to guide the redevelopment of the former MCAS Tustin site. The project site has a zoning designation of Mixed-Use Urban, which is a zoning designation in the Tustin Legacy Specific Plan and provides for mixed-use developments. The surrounding General Plan land use designation includes the Tustin Legacy Specific Plan to the north, east, west, and south. The surrounding zoning designations include Commercial and Residential to the north, Mixed-Use Transit to the east, Residential and Park to the west, and Mixed-Use Transit and Park to the south. Commercial designations provide for a variety of retail and service commercial uses, and the Residential designation provides for range of residential development and housing types. The Park designation provides for passive community park uses, community-level sports, and active recreation uses and the Mixed-Use Transit designation provides for transit-oriented, mixed-use developments.

Figure 1 - Regional Location



City of Tustin Boundary

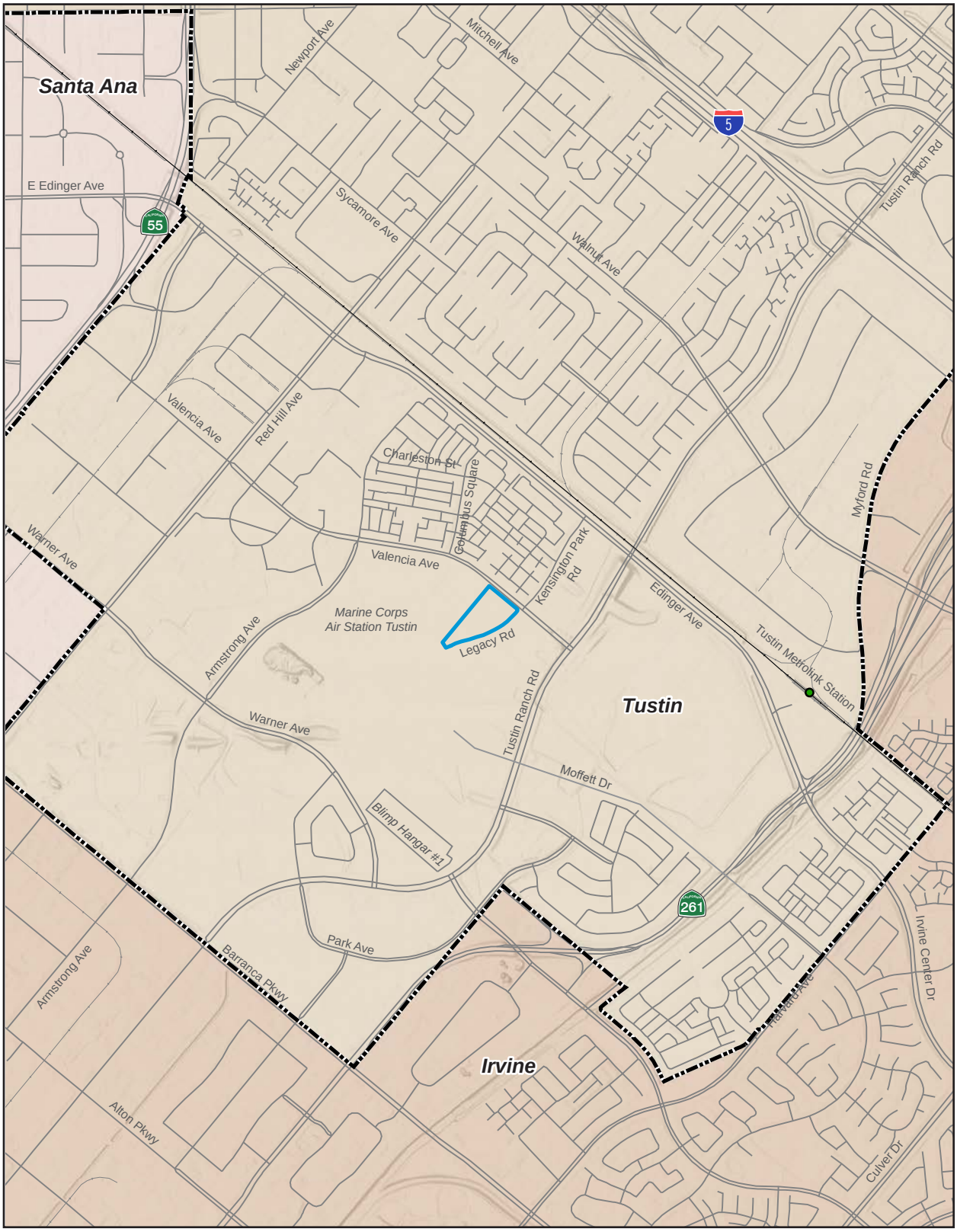
Note: Unincorporated county areas are shown in white.
Source: Generated using ArcMap 2025.

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Scale (Miles)

1. Introduction

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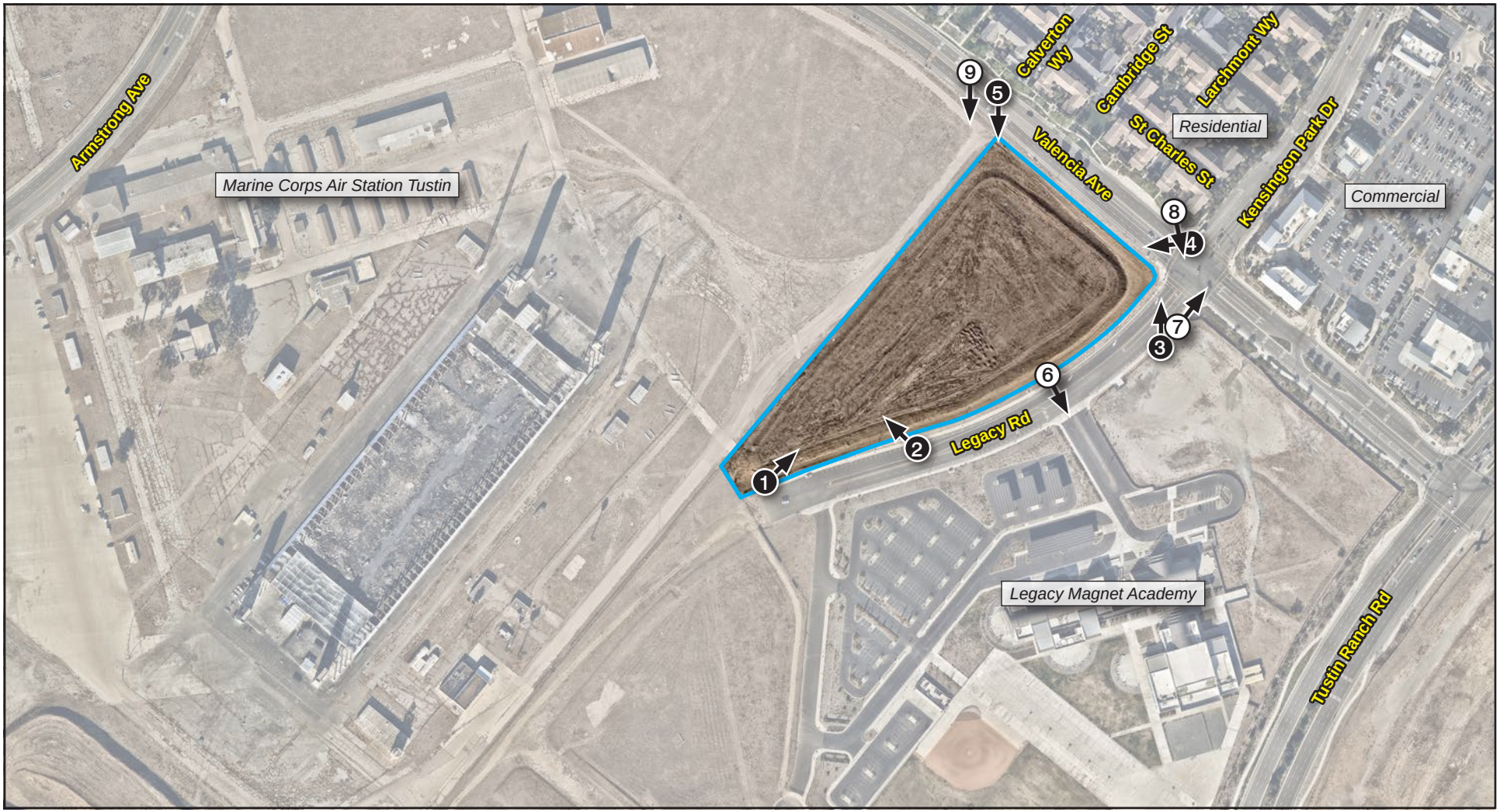
Figure 2 - Local Vicinity



Source: Generated using ArcMap 2025.

1. Introduction

Figure 3 - Aerial Photograph with Photograph Locations



Project Site

Onsite Photograph Locations and Direction (5)

Surrounding Uses Photograph Location and Direction (4)

0 300
Scale (Feet)

Source: Nearmap 2025.

1. Introduction

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Figure 4 - Onsite and Surrounding Uses Photographs



View 1: From the western end of Legacy Road, looking northeast at the project site.



View 2: From the north side of Legacy Road, looking northwest at the project site and the former MCAS Tustin facilities in the background.



View 3: From the south side of Legacy Road, looking north across Legacy Road to the project site and residential uses north of the project site.



View 4: From the northern corner of the Valencia Avenue and Kensington Park Drive intersection, looking west across Valencia Avenue to the project site and former Tustin Blimp Hangar in the background.



View 5: From the northern side of Valencia Avenue, looking south across Valencia Avenue at the project site. The Legacy Magnet Academy and the MCAS Blimp Station #2 are in the background.



View 6: From the north side of Legacy Road, looking across Legacy Road to the Legacy Magnet Academy campus.



View 7: From the southern corner of Legacy Road and Valencia Avenue intersection, looking northeast at the residential and commercial uses to the north and east of the project site.



View 8: From the northern corner of the Valencia Avenue and Kensington Park Drive intersection, looking south at a construction site at the southern corner of the intersection. Legacy Magnet Academy campus, and the Tustin Hangar #2 in the background.



View 9: From northern side of Valencia Avenue, west of Kensington Park Drive, looking south at the project site and the former Marine Corps Air Station Tustin and former northern Tustin Blimp Hangar.

Source: PlaceWorks 2025.

1. Introduction

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1.2.4 Former Use of the Project Site

The project site, including the surrounding area, was part of the former 1,600-acre MCAS Tustin commissioned in 1942 (Tustin 2025b). MCAS Tustin was closed on July 2, 1999, under the Base Realignment and Closure Act. The land was given to the City of Tustin on May 13, 2002 (Tustin 2025b). To plan for the development of the area, the City of Tustin prepared a combined specific plan/reuse plan on January 16, 2001, known as the Tustin Legacy Specific Plan, to guide the base's transformation for civilian use (Tustin 2025b).

The MCAS Tustin included various military buildings, two blimp hangars, paved outdoor aviation staging areas, a runway, helicopter landing pads, drum storage areas, fire-fighting test pits, underground storage tanks, aboveground storage tanks, warehouses, and storage buildings.

1.3 PROJECT DESCRIPTION

1.3.1 Proposed Land Use

The District is proposing to build a new education center and an outdoor event space with parking infrastructure and landscaping on the northeast side of the project site (approximately 5.25 acres of the 8.51-acre project site). The southwestern side of the project site (approximately 3.26 acres) would remain vacant. No known or planned development is proposed for the vacant area.

1.3.1.1 EDUCATION CENTER

The proposed project would consist of one single-story building that would contain offices for various District functions, a board room, kitchen, and other accessory spaces (storage rooms, restrooms, hallways, etc.). The various District functions proposed in this building include educational services, special education, student services, personnel, accounting, purchasing, payroll, and nutrition services. The proposed project would also serve as a training center and educational support center for District staff. See Figure 5, *Conceptual Site Plan*.

The proposed Education Center would be single story and approximately 27 feet in height. The exterior of the Education Center would be Modern design. Building materials used to create the Modern design include phenolic wood, white and bronze metal paneling, Eldorado Stone, and La Habra "Angelic Starlet" as an exterior paint color. Clear glass windows and doors would be installed throughout the buildings. See Figure 6, *Proposed Building Elevations*.

The proposed Education Center would be in the northeast part of the project site and would be approximately 44,945 square feet. It would include offices, work stations, workrooms, conference rooms, a training center, a board room, file storage rooms, a lounge, restrooms, a kitchen, a custodial closet, a data/tech/sound room, and a mail room. Outdoor patios with seating would be immediately adjacent to the Education Center on the north, south, and east. The proposed Education Center would accommodate District personnel for various services and departments. Ornamental landscaping would be installed throughout the project site. Additionally, the southwest part of the project site would remain undeveloped. See Figure 5.

1. Introduction

Outdoor Event Center

The proposed project would include the construction of an outdoor event center for District-held events and trainings and community events. The outdoor event center would be in the eastern part of the project site, near the corner of Valencia Avenue and Legacy Road and east of the Education Center. The outdoor event center would include an outdoor auditorium with a shaded stage near the northeast corner of the project site. Concrete block benches for seating would fan out from the stage to the southwest.

Parking and Access

The proposed project would include both public parking for visitors and staff and secured parking for staff.

The proposed project would include a public parking lot south of the Education Center along Legacy Road and would be approximately 64,684 square feet. The public parking lot would include parking for visitors and staff. The public parking lot would consist of 148 parking stalls and would include 25 electric vehicle (EV) capable parking stalls and 6 EV-charging parking stalls. The public parking lot would be accessed by two ingress-egress driveways along Legacy Road. The public parking lot would also include landscaped medians throughout the parking lot and a pick-up and drop-off area in the northern part of the parking lot and directly in front of the Education Center. See Figure 5.

The proposed project would include a secured parking lot north of the Education Center and along Valencia Avenue that would be approximately 36,209 square feet. The secured parking lot would be reserved for staff parking, consist of 108 parking stalls, and include 25 EV-capable parking stalls and 6 EV-charging parking stalls. The secured parking lot would be accessed from one gated ingress-egress driveway along Valencia Avenue. The secured parking lot would also include landscaped medians throughout the parking lot and a solar canopy in the middle of the parking lot. See Figure 5.

Outdoor Spaces and Landscaping

The north side of the project site would be landscaped throughout and would include outdoor gathering spaces and pedestrian walkways. Landscaping would include trees, shrubs, other ornamental plants, raised garden beds, and bioswales. The outdoor gathering spaces (in addition to the outdoor event center) would include a pedestrian plaza with a canopy solar structure to the east of the proposed building, two shaded seating areas (one to the west and one to the south of the proposed building), and two smaller, unshaded seating areas to the north of the proposed building. The walkways would provide internal pedestrian circulation and connect to the various areas of the project site. The walkways would also connect to the sidewalks along the public rights-of-way. See Figure 5.

Utilities

The proposed project would connect to existing utilities in the public rights-of-way. The utilities would include sewer, water, gas, and power. The proposed project would be contracted to Ware Disposal, Inc. for solid waste disposal services.

Figure 5 - Conceptual Site Plan



Source: Ruhnau Clarke Architects 2025.

1. Introduction

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Figure 6 - Proposed Building Elevations



NORTH ELEVATION



SOUTH ELEVATION



EAST ELEVATION



WEST ELEVATION

0 20
Scale (Feet)

Source: Ruhnau Clarke Architects 2024.

1. Introduction

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As stated above, there is no known or proposed development on the vacant side of the project site. However, to allow for easier utility connections in the future, utility lines would be stubbed at the boundary with the vacant side of the project site.

1.3.2 Operations

The education center would include approximately 110 employees, and regular hours of operation would be from 7:30 am to 4:30 pm, Monday through Friday. Of the 110 employees, 83 employees would be relocated from the existing District office at 300 South C Street in Tustin, and 27 employees would be relocated from the District's existing educational support center at 1151 San Juan Street, Room 4, in Tustin. The proposed project would not generate new employees.

The existing District office building would be closed with implementation of the proposed project. The District would continue to own and maintain this property, and no future plans are proposed or known for this site. The other uses at the current educational support center would continue to operate. No other uses are proposed or known for the existing educational support center.

The proposed board room can accommodate up to 125 people, and meetings would occur after regular hours of operation, from approximately 6:00 pm to 7:30 pm, on the second Monday of each month. Board of education study sessions may occur on the fourth Monday of each month, if necessary. The training center can accommodate up to 65 people.

The outdoor event space would function primarily as an accessory space to other functions at the District Education Center. This may include outdoor professional development functions, additional outdoor dining, and a space for presentations associated with District functions. The outdoor event center would serve as a formal and informal gathering space. District staff would use the space informally during lunch and gatherings. The outdoor event center would be used for formal professional development events on an as-needed basis up to five events per month. Other formal events could include presentations or other events celebrating education in the District. No events would occur on weekends and after work hours. In addition to the District's use, the outdoor events center can also be used by the community in accordance with the Civic Center Act. The outdoor events center would include permanent speakers and generate amplified sound.

1.3.3 Construction

The construction of the proposed project would occur in one phase and would start during September of 2026 and end in January 2028. Construction activities would include site preparation, grading, construction, and utility trenching. Construction activities and staging would be on-site. Additionally, construction activities would comply with the City of Tustin's noise ordinance, which allows construction between 7:00 am and 6:00 pm, Monday through Friday, and from 9:00 am to 5:00 pm on Saturdays but prohibits it on Sundays and City-observed federal holidays (Tustin Ord. No. 828, Sec. 1).

1.4 DISCRETIONARY APPROVALS

The District is the lead agency under CEQA and is carrying out the proposed project. The District Board of Education (Board) must approve the proposed project and adopt the IS/MND and Mitigation Monitoring and Reporting Program (MMRP). The Board will consider the information in the IS/MND when making its decision to approve or deny the proposed project, or in directing modifications to the proposed project in response to the IS/MND's findings and mitigation measures. The IS/MND is intended to disclose to the public the proposed project's details, analyses of the proposed project's potential environment impacts, and identification of feasible mitigation that would lessen or reduce significant impacts to less-than-significant levels.

The District is the lead agency under CEQA and has approval authority over the proposed project. The proposed project would require approval and/or coordination from the Division of State Architects and City of Tustin Public Works Department. See Table 1, *Discretionary Approvals*.

Table 1 Discretionary Approvals

Lead Agency	Action
Tustin Unified School District	• Adopt the Initial Study/Mitigated Negative Declaration • Adopt the Mitigation Monitoring and Reporting Program • Approve the proposed project
Responsible Agencies	**Action**
Department of General Services, Division of State Architect	• Approve construction drawings
Santa Ana Regional Water Quality Control Board	• Construction General Permit
South Coast Air Quality Management District	• Construction Permit
City of Tustin Public Works Department	• Approve new driveways to connect to the public rights-of-way. • Approve of a Water Quality Management Plan • Approve new connections to water and wastewater.

2. Environmental Checklist

2.1 PROJECT INFORMATION

1. **Project Title:** Tustin Unified School District Education Center Project

2. **Lead Agency Name and Address:**
   Tustin Unified School District
   300 S. C Street
   Tustin, California 92780
   714.730.7515

3. **Contact Person and Phone Number:**
   Tom Rizzuti, Director, Facilities and Planning
   714.730.7515

4. **Project Location:**
   The project site is located at the west corner of the intersection of Legacy Road and Valencia Avenue (APN 430-391-76) in the City of Tustin, Orange County.

5. **Project Sponsor's Name and Address:**
   Tustin Unified School District
   300 S. C Street
   Tustin, California 92780

6. **General Plan Designation:** Tustin Legacy Specific Plan

7. **Zoning:** Mixed-Use Urban

8. **Description of Project:**
   The proposed project would consist of building a new education center and an outdoor event space with parking infrastructure and landscaping. The southwestern side of the project site (approximately 3.26 acres) would remain vacant.

9. **Surrounding Land Uses and Setting:**
   Surrounding land uses include vacant land and residential uses to the north; a decommissioned MCAS Tustin blimp hangar and MCAS buildings to the west; vacant lands, a construction site, and the Legacy Magnet Academy to the south; and commercial uses to the east.

2. Environmental Checklist

10. Other Public Agencies Whose Approval Is Required (e.g., permits, financing approval, or participating agreement):

Department of General Services, Division of State Architect: Approval of Construction Drawings
Santa Ana Regional Water Quality Control Board: Construction General Permit
South Coast Air Quality Management District: Construction Permit
City of Tustin Public Works Department: Approval of new driveways, water quality management plan, and new water and wastewater connections.

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.?

> Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.94 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

The Tustin Unified School District invited California Native American tribes that are traditionally and culturally affiliated with the project area to consult on the proposed project pursuant to Assembly Bill 52 (AB 52).

Nine tribes were invited to consult based on Native American Heritage Commission's Native American Contact List and the District's AB 52 list—Cahuilla Band of Indians, Gabrieleno Band of Mission Indians–Kizh Nation, Gabrieleno/Tongva Indians of California Tribal Council, Gabrielino Tongva Indians of California Tribal Council, Gabrielino/Tongva Nation, Juaneno Band of Mission Indians Acjachemen Nation–Belardes, Juaneno Band of Mission Indians Acjachemen Nation 84A, Pala Band of Mission Indians, and Santa Rosa Band of Cahuilla Indians. The invitation letters were sent to tribes on September 8, 2025, via mail to the available addresses.

On October 8, 2025, the District received a request for consultation from the Juaneno Band of Mission Indians Acjachemen Nation-Belardes regarding the proposed project. The tribe recommended mitigation to address the inadvertent discovery of tribal cultural resources and to minimize the potential impacts to tribal cultural resources. The mitigation measures were incorporated into this IS/MND, and tribal consultation pursuant to AB 52 was concluded on October 24, 2025 for the proposed project.

2.2 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 and Hazardous Materials
☐ Hydrology/Water Quality	☐ Land Use / Planning	☐ Mineral Resources
☐ Noise	☐ Population / Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities / Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

2.3 DETERMINATION (TO BE COMPLETED BY THE LEAD AGENCY)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Tom Bryant — *Signature*

1/20/26 — *Date*

2.4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.

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

   a) **Earlier Analyses Used.** Identify and state where they are available for review.

   b) I**mpacts Adequately Addressed.** Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   c) **Mitigation Measures.** For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

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

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

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

9. The explanation of each issue should identify:

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

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			X	
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				X
II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?		X		
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	
IV. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		X		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?			X	
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?		X		
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?			X	
V. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?			X	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?		X		
c) Disturb any human remains, including those interred outside of dedicated cemeteries?			X	

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. ENERGY. Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X	
VII. GEOLOGY AND SOILS. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			X	
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?			X	
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?			X	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			X	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			X	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		X		
VIII. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?		X		

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?		X		
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			X	
X. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in a substantial erosion or siltation on- or off-site;			X	
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;			X	
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			X	
iv) impede or redirect flood flows?			X	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			X	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	
XI. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?				X
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				X

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?				X
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X
XIII. NOISE. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
b) Generation of excessive groundborne vibration or groundborne noise levels?			X	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				X
XIV. POPULATION AND HOUSING. Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X
XV. PUBLIC SERVICES. Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?			X	
Police protection?			X	
Schools?				X
Parks?				X
Other public facilities?				X
XVI. RECREATION.				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X
XVII. TRANSPORTATION. Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			X	
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?			X	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	
d) Result in inadequate emergency access?			X	
XVIII. TRIBAL CULTURAL RESOURCES.				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or		X		
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		X		
XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
c) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	
XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?			X	
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?			X	
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?			X	
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?			X	
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?		X		
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)			X	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

2. Environmental Checklist

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3. Environmental Analysis

Section 2.4 provided a checklist of environmental impacts. This section provides an evaluation of the impact categories and questions contained in the checklist and identifies mitigation measures, if applicable.

3.1 AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:

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

Less Than Significant Impact. The Tustin General Plan Conservation, Open Space, and Recreation Element does not specify scenic vistas within the City; however, the General Plan describes public views as along the ridgelines, toward the inland mountains, and along scenic transportation corridors. The General Plan does identify the Peters Canyon Ridgeline, the redwood/cedar grove, the knoll, and major tree stands as important viewsheds within the City (Tustin 2018). The Peters Canyon Ridgeline is approximately 4.7 miles northeast of the project site, with existing development and vegetation between the project site and the ridgeline. Based on the distance and existing development, the proposed project would not impact or constrain views from the Peters Canyon Ridgeline. Scenic transportation corridors are not identified by the General Plan, though Figure CORS-4 of the General Plan identifies Valencia Avenue as a roadway proposed for landscape corridor strengthening. Views of scenic vistas would be obstructed if and when landscape corridor strengthening were to occur on Valencia Avenue. Thus, the proposed project would not substantially impact or constrain views from scenic resources.

Although not defined, the General Plan states "hillside areas which offer sweeping panoramic views of the Pacific Coast and Saddleback Mountains" as well as views of hillside, public monuments, Peters Canyon Ridgeline, and other important viewsheds are considered scenic resources. The project site and surrounding area are primarily developed with no hillsides, mountains, or views of the ocean in the immediate vicinity. Peters Canyon Ridgeline is the closest scenic resource to the project site, but due to the distance, views of and from the Peters Canyon Ridgeline would not be impacted. The proposed project would construct a new education center and an outdoor event space with parking infrastructure and landscaping. The proposed education center would have a maximum building height of approximately 27 feet. This height would be similar to existing educational facilities at Legacy Magnet Academy and would be compatible with surrounding one- to two-story residential and commercial uses. The proposed project would not substantially impact or constrain views of identified scenic resources.

The proposed administration buildings would be comparable in height to surrounding classroom, residential, and commercial development and would be confined to the project site. Therefore, public right-of-way views, including long-range views toward the mountains, would largely remain in their existing condition, and the

project would not substantially block views of ridgelines or hillsides. The proposed project would not have a substantial effect on scenic vistas. Impacts would be less than significant.

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

No Impact. Scenic resources in the city include hillsides, public monuments, Peters Canyon Ridgeline, the Pacific Coast, the Saddleback Mountains, and other important viewsheds as scenic vistas (Tustin 2018). As discussed in Section 3.1(a), the proposed project and surrounding areas are primarily developed with no notable visual resources. Although views of the Saddleback Mountains to the northwest are largely constrained by vegetation, residential, and commercial development (The Village at Tustin Legacy), they are partially visible. The proposed project would have a maximum height of approximately 27 feet and would be similar in height to surrounding uses. The project site is flat, with no ridgelines, hillsides, or rock outcroppings. Although no trees currently exist on the site, the project would introduce new landscaping, including trees.

The nearest officially designated state scenic highway is a section of State Route 91 (SR-91) near Anaheim Hills, approximately 9.2 miles north of the project site (Caltrans 2025). The nearest eligible state scenic highway to the project site is SR-1 approximately 8 miles southwest of the project site. Due to the distance, topography, and intervening development, the project site is not visible from SR-91 or SR-1. Therefore, the proposed project would not damage scenic resources within a state scenic highway, and no impact would occur.

c) In nonurbanized 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?

No Impact. As defined by Public Resources Code Section 21071, for an incorporated city, an "urbanized area" is a city that either by itself or in combination with two contiguous incorporated cities has a population of at least 100,000 persons. The City of Tustin has an estimated population of 78,864 people (US Census 2025a) and is contiguous with the cities of Irvine, Santa Ana, and Orange. The cities of Irvine and Santa Ana have estimated populations of 318,693, and 316,188, respectively (US Census 2025b, 2025c). Therefore, the project site is in an urbanized area.

The project site is zoned Tustin Legacy Specific Plan, with a land use of Mixed-Use Urban (Tustin 2018a, 2025b). The permitted uses include residential, commercial, office, and public/institutions. The proposed project would not alter the site's land use and zoning; would not conflict with any applicable land use plans, policies, or regulations; and would adhere to the architectural design guidelines in the Tustin Legacy Specific Plan. As discussed in Section 3.1(a), *Aesthetics*, the proposed project would not degrade or damage scenic vistas and resources. Additionally, there are no specific building standards that govern scenic quality in the Mixed-Use Urban zone. Therefore, the proposed project would not conflict with applicable zoning or regulations governing scenic quality, and no impact would occur.

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

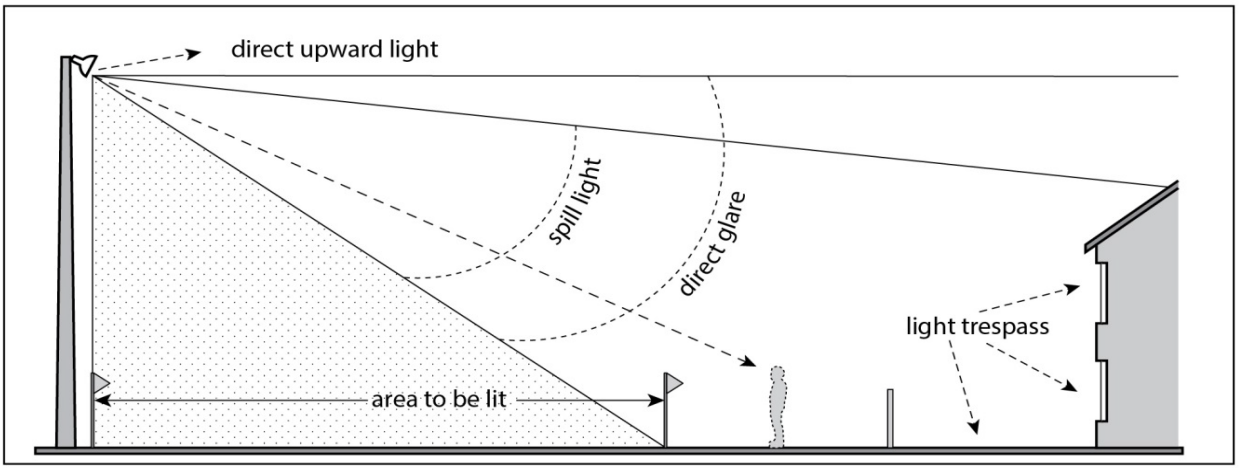
Less Than Significant Impact. There are no existing sources of lighting on the project site. The existing sources of lighting in the surrounding area include street lights, security lighting, light from outdoor residential lights, indoor lights emanating from windows, lights in parking lots, and vehicle headlights traveling on public rights-of-way and in parking lots.

Glare can occur when a light source reflects off a reflective/light-colored surface. Existing sources of glare on-site include light reflecting off vehicles traveling on the public rights-of-way, vehicles parked in parking lots and along public rights-of-way, and light-colored building materials in the surrounding area.

Glare means lighting entering the eye directly from a light fixture or indirectly from reflective surfaces that causes visual discomfort or reduced visibility. Glare can be generated by building-exterior materials, surface-paving materials, vehicles traveling or parked on roads and driveways, and sports lights. Any highly reflective façade material is a concern because buildings can reflect bright sunrays. The concepts of spill light, direct glare, and light trespass are illustrated in Exhibit A, *Spill Light, Direct Glare, and Light Trespass*, adapted from the Institution of Lighting Engineers (ILE 2003).

Direct glare is caused by looking at an unshielded lamp or a light at maximum candlepower. Direct glare is dependent on the brightness of the light source, the contrast in brightness between the light source and the surrounding environment, the size of the light source, and its position.

Exhibit A: Spill Light, Direct Glare, and Light Trespass



Illuminance is the amount of light on a surface or plane, typically expressed in a horizontal plane (e.g., on the ground) or in a vertical plane (e.g., on the side of a building).

Lumen means the unit of measure used to quantify the amount of visible light produced by a light source or emitted from a luminaire (as distinct from "watt," a measure of power consumption).

3. Environmental Analysis

Luminaire means outdoor electrically powered illuminating devices that include a light source, outdoor reflective or refractive surfaces, lenses, electrical connectors and components, and all parts used to mount the assembly, distribute the light, and/or protect the light source, whether permanently installed or portable. An important component of luminaires is their shielding.

- **Fully shielded**. A luminaire emitting no light above the horizontal plane.
- **Shielded**. A luminaire emitting less than 2 percent of its light above the horizontal plane.
- **Partly shielded**. A luminaire emitting less than 10 percent of its light above the horizontal plane.
- **Unshielded**. A luminaire that may emit light in any direction.

Light trespass. Spill light that, because of quantitative, directional, or type of light, causes annoyance, discomfort, or loss in visual performance and visibility. Light trespass is light cast where it is not wanted or needed, such as light from a streetlight or a floodlight that illuminates someone's bedroom at night, making it difficult to sleep. As a general rule, taller poles allow fixtures to be aimed more directly on the surface target, which reduces the amount of light spilling into surrounding areas. Proper fixture angles ensure even light distribution and reduce spill light, as shown in Exhibit A, *Spill Light, Direct Glare, and Light Trespass.*

Sky Glow is light that reflects into the night sky and reduces visibility of the sky and stars. It is a concern in many jurisdictions, especially those with observatories.

Spill light is caused by misdirected light that illuminates areas outside the area intended to be lit. Spill light can contribute to light pollution.

Municipal Code

City of Tustin Municipal Code, Article 9, Chapter 2. All exterior lighting shall be subject to the following standards, unless otherwise exempted by the City of Tustin:

- **(a)Outdoor lighting** shall be designed so as to minimize impacts from light pollution including light trespass and glare to minimize conflict caused by unnecessary illumination.

- **(b)Outdoor lighting fixture**s that are used to illuminate a premises, architectural feature or landscape feature on private property shall be directed, shielded, or located in such a manner that the light source is not directed off-site (Ord. No. 1429, Sec. II.47, 5-21-13).

Proposed Project

The proposed project would construct a new education center and an outdoor event space with parking, infrastructure, and landscaping. The proposed project would increase the number of vehicles traveling to and from the project site, which would introduce new sources of light and glare to the project site and surrounding area. New sources of lighting would also include indoor lights emanating from windows, outdoor security lights and parking lights, and vehicle headlights in the project site parking lots. New sources of glare would include vehicles associated with the proposed project and proposed buildings with light-colored building material (see Figure 6).

The proposed project would be similar to the buildings in the surrounding area, such as the Legacy Magnet Academy and residential uses and commercial uses across Valencia Avenue. The proposed project would not introduce new substantial sources of light and glare. Outdoor light fixtures would be installed with light shields or filters (Ord. No. 1429, Sec. II.47, 5-21-13). The proposed light-fixtures include shielded luminaires and fully-shielded luminaries, which would reduce sky glow, spill light, and light trespass. Further, the proposed project would install new landscaping and vegetation, such as trees, which would further block light and glare from the project site. The proposed project would be required to comply with local lighting policies, including but not limited to Ordinance number 1429, Sec. II.47, 5-21-13, so as to not create lighting impacts to surrounding uses. When compared to the existing surrounding uses, the proposed project would not introduce different uses that would create substantially more light and glare. Therefore, the proposed project would not substantially increase new sources of light and glare and would not significantly impact day or nighttime views. Therefore, the proposed project would have a less than significant impact.

3.2 AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:

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

No Impact. The Farmland Mapping and Monitoring Program produces maps and statistical data for analyzing impacts on California's agricultural resources. Agricultural land is rated according to soil quality and irrigation status and is divided into five categories: Prime Farmland, Farmland of Statewide Importance, Farmland of Local Importance, Unique Farmland, and Grazing Land. The best quality land is Prime Farmland (DOC 2025a). Farmland of Statewide Importance is similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Unique Farmland is farmland of lesser quality soils used for the production of the state's leading agricultural crops.

According to the Farmland Mapping and Monitoring Program, the project site is mapped as "Other Land" and is surrounded by "Urban and Built-Up Land" (DOC 2018). The proposed project would be developed on a vacant parcel that has been disturbed. The project site is surrounded by vacant land and residential uses to the north; a decommissioned MCAS Tustin blimp hangar and MCAS buildings to the west; vacant lands, a construction site, and the Legacy Magnet Academy to the south; and commercial uses to the east. The closest

farmland is Farmland of Statewide Importance approximately 3 miles southwest of the project site. The project site does not contain any farmland and would not disturb any type of farmland. Therefore, the proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use. No impact would occur.

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

No Impact. As stated in Section 1.2.3, *Existing General Plan Land Use and Zoning Designations*, the project site is designated under the Tustin Legacy Specific Plan in the General Plan and has a zoning designation of Mixed-Use Urban. The Mixed-Use Urban zoning designation is a zoning designation within the Tustin Legacy Specific Plan and provides for mixed-use developments. The zoning designation specifically provides for mixed-use developments and is not intended for agricultural uses. Additionally, there is no known active Williamson Act contracts in effect on the project site or within the County of Orange (DOC 2025b). Therefore, the project would not conflict with an existing Williamson Act contract. No impact would occur.

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

No Impact. As stated in Impact 3.2(b), the project site is a zoning designation within the Tustin Legacy Specific Plan and provides for mixed-use developments. The zoning designation (Mixed-Use Urban) specifically provides for mixed-use developments and is not intended for forestry uses or timberland production. Additionally, no forest land or timberland production operations exist on the project site. Therefore, development of the proposed project would not conflict with existing zoning for forest land, timberland, or timberland zoned timberland production. No impact would occur.

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

No Impact. As stated in Impact 3.2(c), the project site is not located in forest land. Therefore, development of the proposed project would not require any changes to the existing environment that could result in the conversion of forest land to non-forest use. No impact would occur.

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

No Impact. As stated in Impacts 3.2(a), (b), and (c), the project site is not located on a site that is considered farmland or forest land and the project site is not in active farm or forest use. Therefore, construction and operation of the proposed project would not result in any changes to the existing environment that could result in the conversion of farmland to nonagricultural uses or forest land to non-forest use. No impact would occur.

3.3 AIR QUALITY

The Air Quality section addresses the impacts of the proposed project on ambient air quality and the exposure of people, especially sensitive individuals, to unhealthful pollutant concentrations. A background discussion on

the air quality regulatory setting, meteorological conditions, existing ambient air quality in the vicinity of the project site, and air quality modeling can be found in Appendix A.

The primary air pollutants of concern for which ambient air quality standards (AAQS) have been established, also known as criteria air pollutants, include ozone (O_3), carbon monoxide (CO), coarse inhalable particulate matter (PM_{10}), fine inhalable particulate matter ($PM_{2.5}$), sulfur dioxide (SO_2), nitrogen dioxide (NO_2), and lead (Pb). Areas are classified under the federal and California Clean Air Act as either in attainment or nonattainment for each criteria air pollutant based on whether the AAQS have been achieved. The South Coast Air Basin (SoCAB), which is managed by the South Coast Air Quality Management District (South Coast AQMD), is designated nonattainment for O_3, and $PM_{2.5}$ under the California and National AAQS, nonattainment for PM_{10} under the California AAQS, and nonattainment for lead (Los Angeles County only) under the National AAQS (CARB 2025).

Furthermore, the South Coast AQMD has identified regional thresholds of significance for criteria air pollutant emissions and criteria air pollutant precursors, including VOC, CO, NO_X, SO_X, PM_{10}, and $PM_{2.5}$. Development projects below the South Coast AQMD's regional and localized significance thresholds are not expected to generate sufficient criteria air pollutant emissions to violate any air quality standard or contribute substantially to an existing or projected air quality violation. Where available, the significance criteria established by the South Coast AQMD may be relied upon to make the following determinations. Would the project:

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

Less Than Significant Impact. The South Coast AQMD adopted the 2022 Air Quality Management Plan (AQMP) on December 2, 2022. Regional growth projections are used by South Coast AQMD to forecast future emission levels in the SoCAB. For southern California, these regional growth projections are provided by the Southern California Association of Governments (SCAG) and are partially based on land use designations included in city/county general plans. Typically, only large, regionally significant projects have the potential to affect the regional growth projections. In addition, the consistency analysis is generally only required in connection with the adoption of General Plans, specific plans, and significant projects.

Changes in population, housing, or employment growth projections have the potential to affect SCAG's demographic projections and therefore the assumptions in South Coast AQMD's AQMP. As mentioned in Section 3.14, *Population and Housing*, the District would relocate approximately 110 employees from other existing District office to the project site. The proposed project would not include any classrooms or student use at the project site. Based on its scope and nature, the proposed project would not substantially affect housing, employment, or population projections within the region.

Additionally, as demonstrated in Impact 3.3(b), the regional emissions that would be generated by the operational phase of the proposed project would be less than the South Coast AQMD emissions thresholds and would therefore not be considered by South Coast AQMD to be a substantial source of air pollutant emissions that would have the potential to affect the attainment designations in the SoCAB. Therefore, the proposed project would not affect the regional emissions inventory or conflict with strategies in the 2022 AQMP. Impacts would be less than significant.

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

Less Than Significant Impact. The following describes project-related impacts from regional short-term construction activities and regional long-term operation of the proposed project.

Regional Short-Term Construction Impacts

Construction activities would result in the generation of air pollutants. These emissions would primarily be 1) exhaust from off-road diesel-powered construction equipment; 2) dust generated by construction activities; 3) exhaust from on-road vehicles; and 4) off-gassing of volatile organic compounds (VOCs) from paints.

Construction activities for the proposed project are anticipated to disturb approximately 6.19 acres on the project site. The proposed project would involve demolition, demolition debris haul, site preparation, rough and fine grading, utility trenching, building construction, paving, architectural coating, and finishing/landscaping. Overall construction is anticipated to start in September 2026 and finish in January 2028. Construction emissions were estimated using the California Emissions Estimator Model (CalEEMod), version 2022.1, and are based on the preliminary construction duration provided by the District.

Table 2, *Maximum Daily Regional Construction Emissions*, shows that maximum daily emissions for VOC, NO_X, CO, SO_2, PM_{10}, and $PM_{2.5}$ from construction-related activities would be less than their respective South Coast AQMD regional significance threshold values. Therefore, air quality impacts from project-related construction activities would be less than significant.

Table 2 Maximum Daily Regional Construction Emissions

	Pollutants (lb/day)[1, 2]					
Construction Phase	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Year 2026						
Demolition	2	21	20	<1	1	1
Demolition and Site Preparation	6	51	49	<1	24	12
Demolition, Site Preparation, and Demolition Debris Haul	6	51	50	<1	24	12
Site Preparation	3	30	30	<1	22	11
Site Preparation and Rough Grading	5	45	48	<1	31	16
Rough Grading	2	16	18	<1	9	4
Rough Grading and Utility Trenching	2	16	18	<1	9	4
Building Construction	1	10	14	<1	1	0
Year 2027						
Building Construction 2027	1	10	14	<1	1	<1
Building Construction and Fine Grading	3	24	32	<1	9	4
Building Construction and Architectural Coating	16	10	15	<1	1	<1

Table 2 Maximum Daily Regional Construction Emissions

Construction Phase	Pollutants (lb/day)[1, 2]					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Building Construction, Architectural Coating, and Finishing/Landscaping	16	10	15	<1	1	<1
Building Construction and Finishing/Landscaping	1	10	14	<1	1	<1
Building Construction, Finishing/Landscaping, and Paving	2	17	24	<1	1	1
Building Construction and Paving	2	17	24	<1	1	1
Year 2028						
Building Construction	1	9	13	<1	<1	<1
Maximum Daily Construction Emissions						
Maximum Daily Emissions	16	51	50	<1	31	16
South Coast AQMD Regional Construction Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Significant?	No	No	No	No	No	No

Source: CalEEMod Version 2022.1. South Coast AQMD 2023.

[1] Based on the preliminary information provided by the District. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by South Coast AQMD of construction equipment. Utility trenching emissions included under rough grading due to shared equipment.

[2] Includes implementation of fugitive dust control measures required by South Coast AQMD under Rule 403, including watering disturbed areas a minimum of two times per day, reducing speed limit to 25 miles per hour on unpaved surfaces, and street sweeping with Rule 1186–compliant sweepers.

Long-Term Operation-Related Air Quality Impact

Long-term air pollutant emissions would be generated by area sources (e.g., landscape fuel use, aerosols, architectural coatings, and asphalt pavement), energy use (natural gas), mobile sources (i.e., on-road vehicles), and the on-site emergency generator. The proposed project would build a new education center and outdoor event space, along with parking infrastructure and landscaping throughout the project site. With implementation of the proposed project, no new employees would be generated. The outdoor event space would primarily serve as an accessory to the new education center, used for professional development, outdoor dining, and presentations, with up to five formal events per month. Based on information provided by DJ&A, the proposed project would generate 646 daily trips (Appendix K). According to DJ&A, vehicle trips associated with the outdoor event space were not estimated separately because the space would be utilized predominantly by District staff that would already be on-site. Lastly, the new education center would, at minimum, be designed and built to meet the latest Building Energy Efficiency Standards and California Green Building Standards Code (CALGreen).

While the proposed project would consist of relocating existing District staff and would not constitute an expansion of operational activities across the District, operational emissions generated by the proposed project were estimated and compared against the South Coast AQMD's significance thresholds. As shown in Table 3, *Maximum Daily Regional Operation Emissions*, it is anticipated that operation of the proposed project would result in overall minimal emissions that would not exceed the South Coast AQMD regional operation-phase

significance thresholds. Impacts to the regional air quality associated with operation of the proposed project would be less than significant.

Table 3 Maximum Daily Regional Operation Emissions

Source	Maximum Daily Emissions (lbs/Day)					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Max Daily Emissions						
Mobile	2	1	15	<1	4	1
Area	1	<1	2	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Stationary (Emergency Generator)	1	3	3	<1	<1	<1
Total	**4**	**4**	**20**	**<1**	**4**	**1**
South Coast AQMD Regional Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Threshold?	No	No	No	No	No	No

Source: CalEEModVersion 2022.1., South Coast AQMD 2023.
Notes: lbs = Pounds. Highest winter or summer emissions are reported.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact with Mitigation Incorporated. The proposed project could expose sensitive receptors to elevated pollutant concentrations if it causes or significantly contributes to elevated pollutant concentration levels. Unlike regional emissions, localized emissions are typically evaluated in terms of air concentration rather than mass so they can be more readily correlated to potential health effects.

Construction LSTs

Localized significance thresholds (LSTs) are based on the California AAQS, which are the most stringent AAQS to provide a margin of safety in the protection of public health and welfare. They are designated to protect sensitive receptors most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and people engaged in strenuous work or exercise. The LSTs were also developed to determine whether a project's emissions have the potential to result in a localized violation of California or National AAQS. The screening-level construction LSTs are based on the size of the project site, distance to the nearest sensitive receptor, and Source Receptor Area (SRA). The nearest off-site sensitive receptors are the townhomes to the north along Valencia Avenue, and Legacy Magnet Academy to the south along Legacy Road.

Air pollutant emissions generated by construction activities would cause temporary increases in air pollutant concentrations. Table 4, *Unmitigated Localized Construction Emissions,* shows the maximum daily construction emissions (pounds per day) generated during on-site construction activities compared with the South Coast AQMD's screening-level LSTs for sensitive receptors within 140 feet (43 meters) for NO_X, CO, PM_{10} and $PM_{2.5}$ in SRA 19: Saddleback Valley. As shown in Table 4, construction of the proposed project could generate on-site emissions that exceed the screening-level LSTs for PM_{10} and $PM_{2.5}$ during certain phases of construction.

Thus, project-related construction activities would have the potential to expose sensitive receptors to substantial pollutant concentrations, and Mitigation Measure AQ-1 is proposed to reduce impacts to less than significant.

Table 4 Unmitigated Localized Construction Emissions

Construction Activity	Pollutants(lbs/day)[1]			
	NO_X	CO	PM_{10}[2]	$PM_{2.5}$[2]
South Coast AQMD ≤1.00 Acre LST	92	793	8.95	3.71
Demolition	21	19	1.15	0.81
Exceeds LST?	No	No	No	No
South Coast AQMD 1.31-Acre LST	104	907	10.68	4.24
Building Construction 2026	10	13	0.38	0.35
Building Construction 2027	9	13	0.34	0.31
Building Construction and Architectural Coating	10	14	0.36	0.33
Building Construction, Architectural Coating, and Finishing/Landscaping	10	14	0.36	0.33
Building Construction and Finishing/Landscaping	9	13	0.34	0.31
Building Construction, Finishing/Landscaping, and Paving	16	23	0.64	0.58
Building Construction and Paving	16	23	0.64	0.58
Building Construction 2028	9	13	0.30	0.28
Exceeds LST?	No	No	No	No
South Coast AQMD 2.31 Acre LST	135	1,248	16.06	5.90
Building Construction and Fine Grading	24	30	8.78	4.36
Exceeds LST?	No	No	No	No
South Coast AQMD 2.50 Acre LST	139	1,301	17.01	6.20
Rough Grading	15	17	8.49	4.09
Rough Grading and Utility Trenching	15	17	8.49	4.09
Exceeds LST?	No	No	No	No
South Coast AQMD 3.50 Acre LST	160	1,587	22.08	7.77
Site Preparation	29	29	22.01	**11.35**
Exceeds LST?	No	No	No	**Yes**
South Coast AQMD 4.50 Acre LST	181	1,872	27.14	9.34
Demolition and Site Preparation	50	48	23.16	**12.16**
Demolition, Site Preparation, and Demolition Debris Haul	50	48	23.20	**12.17**
Exceeds LST?	No	No	No	**Yes**
South Coast AQMD 5.00 Acre LST	191	2,015	29.67	10.12
Site Preparation and Rough Grading	44	46	**30.50**	**15.44**
Exceeds LST?	No	No	**Yes**	**Yes**

Sources: CalEEMod Version 2022.1. South Coast AQMD 2008a, 2011, and 2023.

Notes: In accordance with South Coast AQMD methodology, only on-site stationary sources and mobile equipment are included in the analysis. Screening-level LSTs are based on receptors within 140 feet (43 meters) for NO_X, CO, PM_{10} and $PM_{2.5}$ in SRA 19. Acres disturbed per day estimates are drawn from the construction equipment and maximum acreage of disturbance per day consistent with South Coast AQMD guidance.

[1] Where specific information for project-related construction activities or processes was not available, modeling was based on CalEEMod defaults. These defaults are based on construction surveys conducted by the South Coast AQMD. Utility trenching emissions are included under rough grading due to shared equipment.

[2] Includes fugitive dust control measures required by South Coast AQMD under Rule 403, such as watering disturbed areas a minimum of two times per day, reducing speed limit to 25 miles per hour on unpaved surfaces, and street sweeping with Rule 1186–compliant sweepers.

3. Environmental Analysis

Implementation of Mitigation Measure AQ-1 would require the use of dust suppressants and watering of exposed surfaces three times per day to reduce on-site particulate matter emissions (i.e., PM_{10} and $PM_{2.5}$). As shown in Table 5, *Mitigated Localized Construction Emissions*, construction of the proposed project with incorporation of Mitigation Measure AQ-1 would reduce the PM_{10} and $PM_{2.5}$ emissions, and the proposed project would not generate on-site emissions that exceed South Coast AQMD's screening-level LSTs. Consequently, air quality impacts from construction activities would be reduced to less than significant with incorporation of mitigation.

Table 5 Mitigated Localized Construction Emissions

Construction Activity	Pollutants(lbs/day)[1]			
	NO_X	CO	PM_{10}[2]	$PM_{2.5}$[2]
South Coast AQMD 3.50-Acre LST	160	1,587	22.08	7.77
Site Preparation	29	29	6.52	3.79
Exceeds LST?	No	No	No	No
South Coast AQMD 4.50-Acre LST	181	1,872	27.14	9.34
Demolition and Site Preparation	50	48	7.41	4.58
Demolition, Site Preparation, and Demolition Debris Haul	50	48	7.45	4.59
Exceeds LST?	No	No	No	No
South Coast AQMD 5.00-Acre LST	191	2,015	29.67	10.12
Site Preparation and Rough Grading	44	46	9.13	5.28
Exceeds LST?	No	No	No	No

Source: CalEEMod Version 2022.1. South Coast AQMD 2008a, 2011, and 2023.

Notes: In accordance with South Coast AQMD methodology, only on-site stationary sources and mobile equipment are included in the analysis. Screening-level LSTs are based on receptors within 140 feet (43 meters) for NO_X, CO, PM_{10} and $PM_{2.5}$ in SRA 19. Table only displays the construction activities that exceeded the unmitigated screening-level LSTs in Table 4.

1 Where specific information for project-related construction activities or processes was not available, modeling was based on CalEEMod defaults. These defaults are based on construction surveys conducted by the South Coast AQMD.

2 Includes fugitive dust control measures required by South Coast AQMD under Rule 403, such as watering disturbed areas a minimum of two times per day, reducing speed limit to 25 miles per hour on unpaved surfaces, and street sweeping with Rule 1186–compliant sweepers. Includes MM AQ-1, which would require the use of dust suppressants and watering of exposed surfaces three times per day to reduce on-site particulate matter emissions.

Mitigation Measure

AQ-1 The District shall require the incorporation of the following to reduce air pollutant emissions during construction activities:

- During construction, the construction contractor shall ensure the use of dust suppressants and watering of exposed surfaces three times per day.

Construction Health Risk

The proposed project would elevate concentrations of TACs (e.g., diesel particulate matter) in the vicinity of sensitive land uses during temporary construction activities that would operate offroad equipment on-site and at different levels depending on the type of activity. The nearest off-site sensitive receptors are the single-family residences along Valencia Avenue to the northeast, park receptors along Valencia Avenue to the northeast at

Montgomery Square Park, worker receptors east of the project site, and student receptors at the Legacy Magnet Academy to the south.

A site-specific construction health risk assessment (HRA) of TACs was prepared to quantify potential health risk emissions during construction (see Appendix B). The results of the analysis are shown in Table 6, *Unmitigated Construction Risk Summary,* and demonstrate that construction activities associated with the proposed project would not exceed the South Coast AQMD thresholds.

Table 6 Unmitigated Construction Risk Summary

Receptor	Cancer Risk (per million)[1]	Chronic Hazards
Maximally Impacted Residential Receptor	6	<0.1
Maximally Impacted Worker Receptor	<1	<0.1
Maximally Impacted Park Receptor	<1	<0.1
Maximally Impacted Student Receptor	<1	<0.1
South Coast AQMD Threshold	10	1.0
Exceeds Threshold?	**No**	**No**

Source: Appendix B.

[1] In accordance with the latest OEHHA guidance, the calculated total cancer risk conservatively assumes that the risk for the maximally impacted residential and park receptors consists of a pregnant woman in the third trimester that subsequently gives birth to an infant during the approximately 1.5-year construction period; therefore, calculated risk values for age groups from third trimester through 2 years of age were multiplied by a factor of 10.

The results of the HRA are based on the maximum receptor concentration over an approximately 1.5-year construction exposure duration for receptors.

- Cancer risk for the maximally impacted individual from project construction activities were calculated to be 6 in a million and would not exceed the 10 in a million-significance threshold.
- For non-carcinogenic effects, the chronic hazard index identified for each toxicological endpoint totaled less than one for all the off-site sensitive receptors. Therefore, chronic non-carcinogenic hazards are less than significant.

Because cancer risks for analyzed receptors would not exceed the South Coast AQMD significance thresholds, health risk impacts during project construction would be less than significant and no mitigation is required.

Operation LSTs

Operation of the proposed project would not generate substantial emissions from on-site stationary sources. Land uses that have the potential to generate substantial stationary sources of emissions include industrial land uses, such as chemical processing and warehousing operations where truck idling would occur on-site and would require a permit from South Coast AQMD. The proposed project would build a new education center and outdoor event space, with parking infrastructure and landscaping throughout the project site. Thus, the proposed project does not fall within these categories of uses. Operation of the new education center would use standard on-site mechanical equipment (such as heating, ventilation, and air conditioning) and include an emergency generator. The emergency generator is anticipated to operate approximately once per day, one day

per month, for routine testing and maintenance, or as needed during emergencies. Given this limited operating schedule, the emergency generator would not represent a substantial source of onsite stationary source emissions, and localized on-site air pollutant emissions would be nominal. Accordingly, localized air quality impacts related to operation-related emissions would be less than significant.

Carbon Monoxide Hotspots

Vehicle congestion has the potential to create pockets of CO called hotspots. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles are backed up and idle for longer periods and are subject to reduced speeds. These pockets could exceed the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9.0 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to AAQS is typically demonstrated through an analysis of localized CO concentrations.

The SoCAB has been designated attainment under both the National and California AAQS for CO. However, South Coast AQMD does not have an adopted screening criteria to determine whether a project may have the potential to generate a CO hotspot. According to the Bay Area Air District, under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection to more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—to generate a significant CO impact (Bay Area Air District 2023). Based on the information provided by DJ&A, the Valencia Avenue segment between Legacy Road and Tustin Ranch Road could experience the highest traffic volumes of 13,068 average daily vehicle trips (ADT) during the buildout year (Appendix K). Using a transportation industry assumption that peak hour trips account for approximately 10 percent of average daily counts, this segment could experience up to 1,307 vehicles per hour and would remain below the Bay Area Air District's recommended hourly screening criteria. Therefore, the proposed project would not introduce new vehicle trips that could result in a CO hotspot when combined with existing traffic volumes, and impacts would be less than significant.

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

Less Than Significant Impact. The proposed project would not result in objectionable odors. The threshold for odor is if a project creates an odor nuisance pursuant to South Coast AQMD Rule 402, Nuisance, which states:

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

The type of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating

operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. The proposed project would build a new education center and outdoor event space, along with parking infrastructure and landscaping throughout the project site. Therefore, the proposed project would not fall within the objectionable odors land uses. Emissions from construction equipment, such as diesel exhaust and volatile organic compounds from architectural coatings and paving activities may generate odors. However, these odors would be low in concentration, temporary, and would not affect a substantial number of people. Odor impacts would be less than significant.

3.4 BIOLOGICAL RESOURCES

Would the project:

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

Less Than Significant Impact With Mitigation Incorporated. Special status species include those listed as endangered or threatened under the federal Endangered Species Act or California Endangered Species Act; species otherwise given certain designations by the California Department of Fish and Wildlife; and plant species listed as rare by the California Native Plant Society. The City of Tustin's General Plan Conservation and Open Space Element identifies that the City contains limited riparian habitat and coastal sage scrub, which is home to some of California's sensitive or endangered species such as the California black-tailed gnatcatcher, the San Diego cactus wren, and the San Diego coast horned lizard (Tustin 2018b). The Conservation and Open Space Element specifies that Peters Canyon Regional Park is home to most of Tustin's coastal sage scrub.

A Biological Resource Evaluation (BRE) was prepared for the project (Appendix C). The Biological Study Area (BSA) encompasses the project site and a 500-foot buffer. The BRE included both a literature review and a reconnaissance-level survey to assess the potential for special-status plant species to grow in the BSA.

The literature review identified 22 special-status plant species as having potential to grow in the region. Of these, 7 species were determined to have a low potential to exist in the BSA, and 15 species were determined to have no potential. No special-status plant species were observed during the reconnaissance survey. The BSA is primarily composed of disturbed habitat dominated by non-native vegetation and therefore provides low to no potential to support special-status plant species.

The BRE also conducted a literature review and a reconnaissance survey for special-status wildlife species. Of the 35 special-status wildlife species identified in the literature review, 5 have a low potential to make use of potential foraging opportunities on-site, and 30 have no potential to appear. Additionally, none of the 35 special-status wildlife species that were identified during the literature review were present in the BSA during the reconnaissance survey.

Although no special-status species were identified during the reconnaissance survey, and none have a moderate to high potential to appear there, the BSA has the potential to function as a migratory pathway. Although the BSA does not provide suitable breeding or nesting habitat for resident or migratory species, it is still considered

to have the potential for nesting. To minimize impacts, vegetation clearing or ground-disturbing activities should be conducted during the non-breeding season (September 1 to February 14) to limit impacts to nesting birds. If vegetation clearing or ground-disturbing activities need to take place during breeding season (February 15 through August 31), a preconstruction nesting bird survey(s) will be required to remain in compliance with the Migratory Bird Treaty Act (MBTA). The last survey should be conducted no more than three days prior to the start of work. Compliance with the MBTA, CDFW regulations, and implementation of Mitigation Measure BIO-1 (MM BIO-1) would ensure that impacts associated with the implementation of the proposed project are less than significant to nesting and migratory birds.

The monarch butterfly is a migratory species that has a low potential to appear during a limited time of the year. The BSA is within the overwintering range of the monarch butterfly in coastal California. The monarch butterfly depends on milkweed (Asclepias spp.) as a source of food and a location where eggs are laid. Though the BSA lacks suitable habitat, mitigation measures would be required to determine if the monarch butterfly is present during construction activities. This would involve determining presence or absence of adult butterflies and milkweed; if neither are found, no additional mitigation efforts are needed. If present, a mitigation plan would be necessary to remain compliant with CEQA and could include a restoration plan, avoiding direct impacts to individuals and host plants, or compensatory mitigation. The proposed project would implement MM BIO-2, which includes preconstruction surveys for adult monarch butterflies and milkweed. Implementation of MM BIO-2 would ensure that project impacts to the monarch butterfly are less than significant.

Mitigation Measures

BIO-1 **Preconstruction Avian Survey.** To the extent feasible, in order to minimize potential impacts to avian species, vegetation clearing or ground-disturbing activities should be conducted during the non-breeding season (September 1 to February 14) to limit impacts to nesting birds. If vegetation clearing or ground-disturbing activities need to take place during breeding season (February 15 through August 31), a pre-construction avian survey(s) will be required. The last survey should be conducted a minimum of three days prior to the start of work. The District shall hire a qualified biologist to prepare the preconstruction avian survey.

If any bird listed under the Migratory Bird Treaty Act is found to be nesting within the project site or within the area of vegetation or ground disturbing activities, an adequate protective buffer zone shall be established by a qualified biologist to protect the nesting site. The distance shall be determined by a qualified biologist based on the site conditions (e.g., topography, if the nest is in a line of sight of the construction, and the sensitivity of the birds nesting). Additional protective measures shall include establishment of clearly delineated exclusion zones (i.e., demarcated by identifiable fencing, such as orange construction fencing or equivalent) around each nest location as determined by a qualified biologist, taking into account the species of birds nesting, their tolerance for disturbance, and proximity to existing development. The nest site(s) shall be monitored by a qualified biologist periodically to see if the birds are stressed by the construction activities and if the protective buffer needs to be increased. Once the young have fledged and are flying well enough to avoid project

construction zones (typically by August), the project can proceed without further regard to the nest site(s).

BIO-2 **Preconstruction Monarch Butterfly Survey.** The District shall hire a qualified biologist to conduct a preconstruction monarch butterfly survey before clearing or ground-disturbing activities. The preconstruction monarch butterfly survey shall determine the presence or absence of adult butterflies and milkweed. If neither are found, no additional mitigation efforts are needed. If present, a mitigation plan would be necessary to remain compliant with CEQA and could include a restoration plan, avoiding direct impacts to individuals and host plants, or compensatory mitigation.

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?

Less Than Significant Impact. Sensitive natural communities are natural communities that are considered rare in the region by regulatory agencies; that are known to provide habitat for sensitive animal or plant species; or are known to be important wildlife corridors. The project site is vacant and disturbed, surrounded by urban uses. The project site is within the Orange Central/Coastal Subregion NCCP/HCP (CDFW 2025a). However, the project site is not an essential connectivity area, California essential habitat connectivity area, or within an Orange County reserve (CDFW 2025b). The project site and surrounding area are outside of any federally designated critical habitat (USFWS 2025a).

The Biological Resource Evaluation identified that no wetlands occur within the BSA or the surrounding one-mile radius (Appendix C). The nearest mapped wetland is over a mile away and separated from the BSA by a school, the 261 toll road, and undeveloped land. A small stormwater inlet exists on-site; however, the inlet has no hydrologic connectivity to jurisdictional waters and is situated within a highly urbanized, residential area. Given the absence of nearby wetlands and the developed nature of the surrounding landscape, the inlet would not adversely affect any riparian habitat or sensitive natural community. Therefore, a less than significant impact would occur.

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?

No Impact. The project site is disturbed by the development and uses of the former MCAS. As discussed in Impact 3.4(b), no wetlands occur within the BSA or the surrounding one-mile radius. Construction-related activities would occur on the project site and not impact any surrounding wetland or riverine habitats. Therefore, the proposed project would not have a substantial adverse effect on protected wetlands, and no impact would occur.

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

Less Than Significant Impact With Mitigation Incorporated. The project site is in an urbanized area of the City of Tustin. The project site is disturbed by the former development and uses of the former MCAS, and the surrounding areas are also disturbed by the MCAS or developed with residential, commercial, or educational uses. No federally designated critical habitat exists on-site or in the vicinity of the project site (USFWS 2025a). The project site does not contain any trees that would provide a suitable habitat for nesting birds.

Although the BSA primarily serves as a migratory pathway and does not provide suitable breeding or nesting habitat for resident or breeding species, it should still be considered as having the potential for nesting (Appendix C). Nesting birds are protected by the MBTA (US Code, Title 16, Sections 703–712). The MBTA prohibits the take, possession, import, export, transport, sale, purchase, barter, or offering of migratory birds, their eggs, parts, and nests, except under a valid permit or as permitted in the implementing regulations. The United States Fish and Wildlife Service administers permits to take migratory birds in accordance with the MBTA. Compliance with the existing California Department of Fish and Wildlife regulations and implementation of MM BIO-1 would ensure that impacts are less than significant to nesting and migratory birds.

As discussed above in Impact 3.4(a), the monarch butterfly has a low potential to occur within the BSA. The BSA lacks suitable habitat and is only within part of their migratory route. Pre-construction surveys would be required to determine if milkweed (Asclepias spp.) is present, which is the butterfly's source of food and where it lays its eggs (Appendix C). Due to the low potential for the presence of monarch butterflies on-site, the proposed project would implement MM BIO-2. Implementation of MM BIO-2 would ensure impacts are less than significant.

With incorporation of MMs BIO-1 and BIO-2 and compliance with the MBTA and existing CDFW regulations, the proposed project would not interfere with native or migratory wildlife or established wildlife corridors or impede the use of native wildlife nursery sites. Impacts would be reduced to less than significant.

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

No Impact. The project site is vacant but disturbed by the development and uses of the former MCAS. The project site contains no trees on-site or in the public right-of-way. Therefore, there are no tree preservation policies or ordinances applicable to the project site. Additionally, compliance with the existing California Department of Fish and Wildlife regulations and implementation of MM BIO-1 would ensure that the proposed project would not impact nesting and migratory birds. The proposed project would comply with General Plan policies protecting biological resources, such as the policies found under Goal 7: "Conserve and protect natural plant and animal communities." The proposed project would comply with and would not conflict with local policies or ordinances; therefore, no impact would occur.

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?

Less Than Significant Impact. The project site is vacant but disturbed by the former development and uses of the former MCAS. The proposed project is within the Orange Central/Coastal Subregion NCCP/HCP but is not an essential connectivity area, California essential habitat connectivity area, or within an Orange County reserve (CDFW 2025a, 2025b). Additionally, the Orange Central/Coastal Subregion NCCP/HCP does not consider the project site as being a low, medium or high value conservation area (USFWS 1996). The proposed project would not affect the HCP/NCCP or other approved local, regional, or state conservation plan, and therefore a less than significant impact would occur.

3.5 CULTURAL RESOURCES

Would the project:

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

Less Than Significant Impact. Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or the lead agency. Generally a resource is considered "historically significant" if it meets one of the following criteria:

i) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

ii) Is associated with the lives of persons important in our past;

iii) Embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possesses high artistic values;

iv) Has yielded, or may be likely to yield, information important in prehistory or history.

The project site is vacant but disturbed by the development and uses of the former MCAS. As discussed in Section 1.2.4., *Former Use of the Project Site*, the project site and surrounding area were part of the former MCAS commissioned in 1942 with various military buildings, two blimp hangars, paved outdoor aviation staging areas, and other structures and by July 2, 1999, MCAS Tustin was closed. Although the project site was part of the former MCAS, no structures remain on-site.

According to the Historical/Archaeological Resources Survey Report (Appendix D), the project area lies in two archaeologically and historically noteworthy areas: the Irvine Ranch and MCAS Tustin. The Irvine Ranch was originally made up of several Mexican and Spanish land grants in Orange County, spanning 100,000 acres. By the 1970s, as many as 600 archaeological sites had been found on the ranch.

3. Environmental Analysis

A cultural resources records search at the South-Central Coastal Information Center (SCCIC) identified 10 previous studies conducted within a one-mile radius of the proposed project as part of the Historical/Archaeological Resources Survey Report. The previous studies include records searches as well as a systematic field survey that covered the northern part of the project site. None of the 10 studies recorded any cultural resources within or adjacent to the project site (HANA Resources 2025a; Appendix D).

According to South Central Coastal Information Center (SCCIC) records, 20 cultural resources have been previously recorded within a one-mile radius of the project site. One of these resources includes one of the two Lighter-Than-Air (LTA) Ship Hangars associated with the former Marine Corps Air Station (MCAS) Tustin. Both hangars are listed in the National Register of Historic Places (NRHP). Although the NRHP lists the hangars as being within the City of Santa Ana and they were originally listed between 1974 and 1975, the hangars are now within the City of Tustin limits (NPS 2025). The hangars are currently decommissioned, and MCAS Hanger #1 (located directly west of the project site) was destroyed by fire in December 2023.

The project site itself is not listed in the California Historical Landmarks, Points of Historical Interest, or State Historic Structures (OHP 2024). The nearest such resource is the Irvine Historical Society Museum / Rancho San Joaquin HEA, approximately 3.3 miles south of the project site. Additionally, the City of Tustin Historic Resources Map identifies all properties previously recorded in the City's 1990 or 2003 Historical Resources Survey as well as any new historic resources (Tustin 2025c). The closest resource identified on the City's map is a residential property at 1901 Walnut Avenue, approximately 0.9 mile north of the project site. Although the property is of historic age, evaluation determined it to be not eligible for listing (Tustin 2025d). Other historic resources or potential historic resources are further from the project site and would not be affected by the proposed project due to their distance.

A field survey that was conducted as part of the Historical/Archaeological Resources Survey Report yielded negative results for potential "historical resources," and no buildings, structures, objects, features, or artifacts of prehistoric or historical origin were observed within or adjacent to the project area. The Historical/Archaeological Resources Survey Report concluded that no potential historical resources exist within the project site and no further cultural resources investigation is recommended. There are no historic resources on the project site that would be considered historically significant pursuant to Section 15064.5. Therefore, a less than significant impact to historical resources would occur.

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

Less Than Significant Impact With Mitigation Incorporated. Earthwork associated with the construction of the proposed project would include grading and utility trenching. The earthwork activities associated with the proposed project would be limited to surface-level grading, generally not exceeding 5 feet in depth, and no subterranean levels requiring extensive excavation are proposed. Additionally, the project site has been previously disturbed with the former MCAS. As stated in Impact 3.5(a), the project area lies in two archaeologically and historically noteworthy areas, Irvine Ranch and MCAS Tustin (Appendix D). By the late 1970s, as many as 600 archaeological sites had been identified on the Irvine Ranch, with 20 cultural resources recorded within a one-mile radius of the project area. Of these, 13 were prehistoric (Native American) in origin,

consisting of 3 archaeological sites and 10 isolates (i.e., localities with fewer than three artifacts), including a site on the former MCAS. The prehistoric archaeological site (30-000381) was destroyed during construction activities in 1971. All prehistoric sites and isolates were characterized by scattered groundstone, flaked-stone, and/or faunal artifacts. The remaining seven resources dated to the historic period and included five sites and two isolates: the Lighter-Than-Air Ship Hangars, a segment of the Burlington Northern Santa Fe Railway, two mid-20th-century buildings (1960s to 1970s), and various refuse deposits (Appendix D). Furthermore, the City of Tustin's General Plan identifies the City's location and geology as contributing to its importance as both an archaeological and paleontological resource area (Tustin 2018).

Although there is no known historical resources within the project area, unknown archaeological cultural materials have the potential to exist. Ground-disturbing activities from the proposed project may uncover unknown archaeological resources. Implementation of Mitigation Measure CUL-1 would ensure that, in the event archaeological resources are discovered during ground-disturbing activities, archaeological resources would be recovered in accordance with state and federal requirements. Additionally, as part of the Historical/Archaeological Resources Survey Report, the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was searched and yielded a negative result, which indicates that no known sacred sites or tribal cultural resources (TCR) exist within the vicinity of the project site (Appendix D). However, the potential unearthing TCRs exists. Implementation of Mitigation Measure TCR-1 (see Section 3.18) would ensure a tribal archaeological monitor is present during ground-disturbing activities. Implementation of Mitigation Measures CUL-1 and TCR-1 would reduce impacts to archaeological resources to less than significant.

Mitigation Measure

CUL-1 Prior to initiating any ground-disturbing activities for the proposed project, the District shall ensure that an archaeologist who meets the Secretary of the Interior's standards for professional archaeology has been retained for the project and will be on-call during all grading and other significant ground-disturbing activities. The qualified archaeologist shall ensure that the following measures are followed for the project:

- Prior to any ground disturbance, the qualified archaeologist shall provide worker environmental awareness protection training to construction personnel regarding regulatory requirements for the protection of cultural resources (prehistoric and historic). As part of this training, construction personnel shall be briefed on proper procedures to follow should unanticipated cultural resources be discovered during construction.
- In the event that unanticipated cultural material is encountered during any phase of project construction, all construction work within 100 feet of the find shall cease and the qualified archaeologist shall assess the find for importance. Construction activities may continue in other areas. If the discovery is determined to not be important by the qualified archaeologist, work will be permitted to continue in the area.
    - If a find is determined to be important by the qualified archaeologist, he or she shall immediately notify the District. The qualified archaeologist shall consult on a finding

of eligibility and implement appropriate treatment measures if the find is determined to be eligible for inclusion in the California Register of Historical Resources (CRHR). Work may not resume within the no-work radius until the qualified archaeologist and District, through consultation as appropriate, determine that the site either: (1) is not eligible for the CRHR; or (2) that the treatment measures have been completed to their satisfaction.

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

Less Than Significant Impact. Given that the project site was previously disturbed by the former MCAS uses, it is unlikely to support conditions conducive to the discovery of human remains. However, human remains could be encountered during excavation and grading activities associated with the proposed project.

In the unlikely event that human remains are encountered during ground-disturbing activities, California Health and Safety Code Section 7050.5 requires that disturbance of the site shall halt and remain halted. The County Coroner shall investigate the circumstances, manner, and cause of any death and recommend the treatment and disposition of the human remains to the person responsible for the excavation or to his or her authorized representative, in the manner provided in Section 5097.98 of the California Public Resources Code. The coroner is required to make a determination within two working days of being notified of the discovery of the human remains. If the coroner determines that the remains are not subject to his or her authority or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the NAHC, who will contact the "most likely descendant." The most likely descendant shall receive access to the discovery and will provide recommendations or preferences for treatment of the remains within 48 hours of accessing the discovery site. Disposition of human remains and any associated grave goods, if encountered, shall be treated in accordance with procedures and requirements in Sections 5097.94 and 5097.98 of the Public Resources Code; Section 7050.5 of the California Health and Safety Code; and CEQA Guidelines Section 15064.5.

While unlikely, any accidental discovery of human remains during project construction and operation would be required to comply with all applicable laws and regulations establishing the proper handling of human remains. Compliance with these laws and regulations would ensure that the proposed project would result in a less than significant impact.

3.6 ENERGY

Would the project:

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

Less Than Significant Impact. The following discusses the potential energy demands from short-term construction and long-term operational energy consumption associated with the proposed project.

Short-Term Construction Impacts

Electrical Energy

The majority of construction equipment would be gas or diesel powered, and electricity would not be used to power most of the construction equipment. Electricity use during construction would vary during different phases of construction. Later construction phases could result in the use of electric-powered equipment for interior demising wall construction and architectural coating. It is anticipated that the majority of electric-powered construction equipment would be hand tools (e.g., power drills, table saws) and lighting, which would result in minimal electricity usage during construction activities. Because the consumption of these energy resources would be necessary for the construction and finishing of the proposed project, project-related construction activities would not result in wasteful or unnecessary electricity demands, and impacts would be less than significant.

Natural Gas Energy

It is not anticipated that construction equipment used for the proposed project would be powered by natural gas, and no natural gas demand is anticipated during construction. Therefore, impacts would be less than significant with respect to natural gas usage.

Transportation Energy

Transportation energy use during construction would come from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction employee vehicles. In addition, transportation energy demand would come from use of off-road construction equipment. It is anticipated that the majority of off-road construction equipment, such as those used during demolition and grading, would be gas or diesel powered.

The use of energy resources by vehicles and equipment would fluctuate according to the phase of construction and would be temporary. In addition, all construction equipment would cease operating upon completion of proposed project construction. Thus, impacts related to transportation energy use during construction would be temporary and would not require expanded energy supplies or the construction of new infrastructure.

Moreover, to limit wasteful and unnecessary energy consumption, the construction contractors are anticipated to minimize nonessential idling of construction equipment during construction, in accordance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9. Construction trips would also not result in unnecessary use of energy since the proposed project site is centrally located in the greater Orange County area and is served by numerous regional freeway systems (e.g., State Route 55, Interstate 5, and Interstate 405) that provide the most direct routes from various areas of the region. Thus, energy use during construction of the proposed project would not be considered inefficient, wasteful, or unnecessary. Impacts would be less than significant.

Long-Term Impacts During Operation

Operation of the proposed project would generate new demand for electricity, natural gas, and transportation energy on the project site. Operational use of energy would include heating, cooling, and ventilation of the

proposed building; water heating; operation of electrical systems, and use of on-site equipment and appliances. Diesel would also be used to operate the emergency generator. Because the generator would run only during maintenance, testing, or in times of emergency, its operation would not constitute wasteful, inefficient, or unnecessary consumption of energy resources. In addition, operation of the emergency generator would comply with South Coast AQMD rules and permit conditions that restrict its use.

Electrical Energy

As shown in Table 7, *Electricity Consumption*, implementation of the proposed project would result in 889,312 kilowatt-hours of electricity use per year.

Table 7 Electricity Consumption

Land Use	Electricity (kWh/year)
Proposed Project Conditions	
New Education Center	800,933
Parking Lots	88,380

Source: CalEEMod Version 2022.1.
Note: kWh = kilowatt-hour.

Electrical service to the project site would be provided by Southern California Edison (SCE) through connections to existing on-site electrical lines as needed. While the proposed project would result in a higher electricity demand than existing conditions on-site, the new education center would be consistent with the requirements of the Building Energy Efficiency Standards and California Green Building Standards Code (CALGreen). Moreover, the proposed project would include solar canopies over the parking areas, which would supply approximately 65 percent of the parking area's total annual electricity demand.

In addition, SCE is required to meet the renewable energy production goals of the California Renewable Portfolio Strategy (RPS). The RPS is a phased requirement for load-serving entities like SCE to increase the proportion of in-state sales of electricity being procured from eligible renewable and carbon-free sources until 2045, when the goal is to procure 100 percent of in-state sales from eligible renewable and carbon-free sources. These features would support the goals outlined in Appendix F of the CEQA Guidelines of promoting the use of renewable energy and decreasing reliance on fossil fuels. Because the proposed project and SCE would comply with these regulations, it would not result in wasteful, inefficient, or unnecessary electricity demands. Therefore, operation of the proposed project would result in a less than significant impact related to electricity.

Natural Gas Energy

As shown in Table 8, *Natural Gas Consumption*, the new natural gas demand for the new education center would total 1,139,197 kilo-British thermal units per year following buildout. Development associated with the proposed project would be built to meet the Building Energy Efficiency Standards, which would ensure energy efficiency as it pertains to natural gas use. Thus, compliance with the Building Energy Efficiency Standards would be consistent with the goals outlined in Appendix F of the CEQA Guidelines because the proposed project would decrease reliance on fossil fuels to meet the natural gas demands of the proposed project. Therefore, the proposed project would not result in wasteful, inefficient, or unnecessary natural gas demands.

Operation of the proposed project would result in less than significant impacts with respect to natural gas usage.

Table 8 Natural Gas Consumption

Land Use	Natural Gas (kBTU/year)
Proposed Project Conditions	
New Education Center	1,139,197

Source: CalEEMod Version 2022.1
Note: kBTU = kilo British thermal units.

Transportation Energy

Operation of the proposed project would consume transportation energy consumption from motor vehicle use associated with employees and visitors to the project site. The efficiency of these motor vehicles is unknown, such as the average miles per gallon. Estimates of transportation energy use are based on the overall vehicle miles traveled (VMT) and associated transportation energy use.

With implementation of the proposed project, no new employees would be generated. The outdoor event space would primarily serve as an accessory to the new education center, used for professional development, outdoor dining, and presentations, with up to five formal events per month. Based on information provided by DJ&A, the proposed project would generate 646 daily trips (Appendix K). However, because a portion of these trips would be generated by employees currently working at the existing District office, implementation of the proposed project would not result in substantial increase in vehicle trips within the District or fossil fuel consumption. In addition, the proposed project would include EV-charging stations in compliance with applicable CALGreen requirements, which would contribute to reducing reliance on fossil fuels and support increased use of renewable energy sources.

Moreover, the average fuel efficiency of vehicles after buildout would improve compared to vehicle fuel efficiencies under existing conditions, resulting in a lower per capita fuel consumption assuming travel distances, travel modes, and trip rates remain the same. The improvement in fuel efficiency would be attributable to the statewide fuel reduction strategies and regulatory compliances (e.g., Corporate Average Fuel Economy [CAFE] standards), resulting in new cars that are more fuel efficient and the attrition of older, less fuel-efficient vehicles. The CAFE standards are not directly applicable to land use development projects, but to car manufacturers. Thus, the employees and visitors do not have direct control in determining the fuel efficiency of vehicles that are manufactured and available. However, compliance with the CAFE standards by car manufacturers would ensure that vehicles produced in future years have greater fuel efficiency and would generally result in an overall benefit of reducing fuel usage by providing more fuel-efficient vehicle options. Therefore, impacts would be less than significant with respect to operation-related fuel usage.

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

Less Than Significant Impact. The state's electricity grid is transitioning to renewable energy under California's Renewable Energy Program. Eligible renewable sources of electricity under the RPS include wind,

small hydropower, solar, geothermal, biomass, and biogas. Electricity production from renewable sources is generally considered carbon neutral. The RPS goals have been updated since adoption of SB 1078 in 2002. In general, California has RPS requirements of 50 percent by 2026, 52 percent by 2027, 60 percent by 2030, 90 percent by 2035, 95 percent by 2040, and 100 percent by 2045.

The statewide RPS requirements do not directly apply to individual development projects, but to utilities and energy providers such as SCE, whose compliance with RPS requirements would contribute to the state objective of transitioning to renewable energy. As previously stated, the proposed project would be required to comply with the current Building Energy Efficiency Standards and CALGreen. Furthermore, the incorporation of EV-charging spaces in the proposed parking lots would support the transition to cleaner transportation by enabling the use of electric vehicles, which can be powered by renewable energy sources such as solar and wind. This infrastructure would reduce reliance on fossil fuels and align with state goals to increase the use of renewable energy. Therefore, implementation of the proposed project would not conflict with or obstruct implementation of California's RPS Program, and this impact would be less than significant.

3.7 GEOLOGY AND SOILS

Would the project:

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

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

Less Than Significant Impact. According to the Phase I Environmental Site Assessment (Phase I ESA), the proposed project is not located within an Alquist-Priolo Earthquake Fault Zone (AP EFZ), and no known active faults capable of surface rupture (those demonstrating displacement within the last 11,000 years) intersect the site, per the most recent California Geological Survey (CGS) mapping (Padre 2025; Appendix E). While the proposed project lies within the seismically active Peninsular Ranges Province, it is also near major fault systems such as the Elsinore, Newport-Inglewood-Rose Canyon, and Whittier faults. In accordance with CGS Special Publication 42, a fault is considered "known" only if there is evidence of Holocene surface expression or associated seismic activity (CGS 2018). The project site is approximately 15 miles southwest of the Elsinore fault zone, 7 miles east of the Newport-Inglewood-Rose Canyon fault zone, and approximately 13.5 miles southwest of the Whittier fault zone. These faults are not expected to rupture at the site itself. Therefore, impacts would be less than significant.

ii) Strong seismic ground shaking?

Less Than Significant Impact. The project site is in a seismically active region. Strong ground shaking due to moderate to severe earthquakes can be expected at the site within the lifetime of the project (Appendix E). The proposed project would be designed in accordance with the seismic requirements of

the California Building Code (CBC) (California Code of Regulations, Title 24), including a development-specific subsurface exploration and laboratory testing prior to design and construction of any structures, and recommendations contained therein would be implemented as required. Additionally, DSA would be required to review and approve the project plans which will ensure that the structures are sufficiently designed to withstand ground shaking. Compliance with the requirements of the CBC and DSA for structural safety during a seismic event would reduce hazards from strong seismic ground shaking. Impacts from strong seismic ground shaking would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. According to the California Geological Survey Liquefaction Zones mapper, the project site is within a liquefaction zone (CGS 2025). The proposed project is underlain by Quaternary alluvium (Chino silty clay loam) and has a groundwater table at 10 to 20 feet below ground surface, conditions that typically exhibit low to moderate liquefaction susceptibility (Appendix E). Although the clay-rich soil composition and current groundwater depth indicate a low potential for seismic ground failure, the presence of observed soil stockpiles on the project site and potential groundwater fluctuations from nearby remediation activities introduce some uncertainty. As such, the proposed project would be subjected to the seismic requirements of the CBC and DSA standards. A comprehensive geotechnical evaluation, including development-specific subsurface exploration and laboratory testing, would be required prior to construction. Recommendations contained therein would be implemented as required, and liquefaction and seismic settlement can be mitigated by proper engineering design. Therefore, compliance with the established standards would ensure that impacts from liquefaction are less than significant and no mitigation measures are necessary.

iv) Landslides?

No Impact. Landslides are the downslope movement of geologic materials. Slope failures in the form of landslides are common during strong seismic shaking in areas of steep hills. Landslides are not expected to occur at the project site, because the ground level is made up of gentle slopes (0 to 2 percent), and the soil type is not prone to sliding. The area has no history of landslides, and there are no steep slopes nearby that could are susceptible to landslide (Appendix E). Therefore, geologic hazards associated with landslides are not anticipated at the site, and no impact would occur.

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

Less Than Significant Impact. The proposed project would involve grading activities for the proposed project. Such earth-moving activities would temporarily expose soils surfaces to increased wind and water erosion. However, grading activities would be regulated by the Regional Water Quality Control Board requirements to ensure that no significant impacts occur. Because the proposed project involves grading of more than one acre, the District would be required to comply with a National Pollutant Discharge Elimination System (NPDES) permitting regulations, including the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP). The proposed project's construction contractor would be required to prepare and implement a SWPPP and associated best management practices (BMP) in compliance with the

Construction General Permit during grading and construction. Types of BMPs that are incorporated in SWPPPs and would help minimize impacts from soil erosion include:

- **Erosion controls.** Cover and/or bind soil surface, to prevent soil particles from being detached and transported by water or wind. Erosion control BMPs include mulch, soil binders, and mats.
- **Sediment controls.** Filter out soil particles that have been detached and transported in water. Sediment control BMPs include barriers, and cleaning measures such as street sweeping.
- **Tracking controls.** Tracking control BMPs minimize the tracking of soil off-site by vehicles; for instance, stabilizing construction roadways and entrances/exits.

Adherence to the BMPs in the SWPPP and adherence with local, regional, and state codes and requirements for erosion control and grading during construction would reduce, prevent, or minimize soil erosion from project-related grading and construction activities.

Additionally, the proposed project exhibits minimal risk of substantial soil erosion or topsoil loss due to its nearly level terrain (0 to 2 percent slopes) (Padre 2025). The site's Chino silty clay loam soils demonstrate moderate erosion resistance in their natural state (Appendix E). During construction activities, temporary, localized disturbance could create minor erosion potential, but this would be effectively mitigated through standard BMPs. With implementation of these standard construction-phase controls, the project would reduce potential impacts to less than significant.

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

Less Than Significant Impact. As discussed in Sections 3.7(a)(iii) and 3.7(a)(iv), the project site is within a liquefaction zone but not in a landslide zone. Additionally, the proposed project would be designed in accordance with the requirements of the CBC.

Lateral spreading is a type of liquefaction-induced ground failure associated with the lateral displacement of surficial blocks of sediment resulting from liquefaction in a subsurface layer. Once liquefaction transforms the subsurface layer into a fluid mass, gravity plus the earthquake inertial forces may cause the mass to move downslope toward a free face (such as a river channel or an embankment). Lateral spreading may cause large horizontal displacements, and such movement typically damages pipelines, utilities, bridges, and structures. Due to the project site being in an identified liquefaction zone, there is the potential for lateral spreading (Caltrans 2020).

As stated above, the proposed project would be subjected to the seismic requirements of the CBC and DSA standards. A comprehensive geotechnical evaluation would be required prior to construction and recommendations contained in the geotechnical evaluation would be implemented as required. Therefore, compliance with the established standards would ensure that impacts from lateral spreading are less than significant and no mitigation measures are necessary.

According to the United States Geological Survey Areas of Land Subsidence in California, the project site is within an area subject to subsidence due to groundwater pumping (USGS 2025). The collapse of soils occurs with (1) an open, partially unstable, partially saturated fabric; (2) sufficient total stress to make the soil structure metastable; (3) the presence of a bonding agent or sufficient soil suction to stabilize the soil in the metastable condition; and (4) the addition of water, which reduces soil suction or softens/destroys the bonding agent, thereby causing shear failures at the inter-aggregate or inter-particle contacts (Caltrans 2024). As discussed above, the proposed project would be designed and constructed to withstand landslide, liquefaction, lateral spreading, subsidence, liquefaction, or collapse potential. With adherence to the CBC and with DSA's review, the proposed project would not result in or contribute to on- or off-site impacts. Additionally, a comprehensive geotechnical evaluation, including development-specific subsurface exploration and laboratory testing, would be prepared, and recommendations would be implemented as required. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. Expansive soils contain certain types of clay minerals that shrink when they dry out and swell when soils become wet, resulting in the potential for cracking building foundations and in some cases, structural distress of the buildings themselves. According to the Phase I ESA, the project site is primarily located within Chino silty clay loam soils with nearly level terrain (Appendix E). Chino silty clay loam soils are poorly to somewhat poorly drained (UC Davis 2020), so they have the potential to expand.

As discussed above, the project will be designed in accordance with the requirements of the CBC and with DSA's review. A comprehensive geotechnical evaluation, including development-specific subsurface exploration and laboratory testing would be prepared, and its recommendations would be implemented as required. Therefore, impacts related to expansive soil would be less than significant, and no mitigation measures are necessary.

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

No Impact. The proposed project would connect to the existing City sewer lines, which are currently available via the surrounding roadways. The proposed project would not involve the use of septic tanks or other alternative wastewater disposal systems. Therefore, no impact would occur.

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

Less Than Significant Impact With Mitigation Incorporated. Paleontological resources represent the remains of prehistoric life, exclusive of any human remains, and include the localities where fossils were collected as well as the sedimentary rock formations in which they were found (HANA Resources 2025b; Appendix F). A paleontological resources assessment was conducted for the proposed project (Appendix F). According to the Paleontological Resources Assessment Report, a paleontological records search service was provided by the Natural History Museum of Los Angeles County (NHMLA), which maintains files of regional paleontological localities as well as supporting maps and documents. The records search results were used to

identify known previously performed paleontological resource assessments as well as known paleontological localities within a one-mile radius of the project area. The records search results provided by the NHMLA identified no paleontological localities within the project area or within a one-mile radius but showed the presence of similar sites found elsewhere in southern California in sediments like those at the project location. The locations of these known localities are as close as the former MCAS El Toro, approximately 5.6 miles southeast of the project site. Two localities were recovered at 25 feet and 150 to 350 feet below ground surface, which far exceed typical depths required for building construction. Two more localities were recovered at unknown depths. According to the NHMLA, potentially fossil-bearing soil units are present within the project area either at the surface or subsurface (Appendix F).

The field survey results found in the Paleontological Resources Assessment Report produced negative results for potential paleontological resources, and no fossilized faunal or floral remains were observed on the surface. Field observations confirmed that the ground surface in the project site had been disturbed in the past, most recently in relation to nearby construction activities. Based on Paleontological Resources Assessment Report, no localities have been identified within the project area or a one-mile radius. However, younger surface soils in the vicinity evidently lie upon Pleistocene alluvial fan deposits that are known to be fossiliferous (Appendix F). Therefore, the project's potential to impact significant, nonrenewable paleontological resources appears to be low in the surface soils but high in the Pleistocene sediments at unknown depths. It is possible that unknown paleontological resources could be discovered during grading activities. Implementation of Mitigation Measure GEO-1, which requires a qualified paleontological monitor to ensure resources are recovered in the event they are found, would ensure that impacts to unknown paleontological resources are less than significant.

Mitigation Measure

GEO-1 Earth-moving operations reaching beyond the previously disturbed surface soils, generally three feet in depth, should be monitored periodically, or "spot-checked," by a qualified paleontological monitor to ensure the timely identification of potentially fossil-bearing sediments. The frequency of the field visits by the paleontological monitor will be dictated by the pace of the project and on-site assessment of the exposed sediments observed during each visit.

Once potentially fossil-bearing sediments are exposed, continuous monitoring will become necessary. The monitor should be prepared to quickly salvage fossils, if they are unearthed, to avoid construction delays, but must be authorized to temporarily halt or divert construction equipment to allow for removal of abundant or large specimens.

During continuous monitoring in the paleontologically sensitive sediments, samples of sediments should be collected and processed to recover small fossil remains.

Recovered specimens should be identified and curated at a repository with permanent retrievable storage that would allow for further research in the future.

A report of findings, including an itemized inventory of recovered specimens and a discussion of their significance when appropriate, should be prepared upon completion of the research procedures outlined above. The approval of the report and the inventory by the District would signify completion of the mitigation program.

3.8 GREENHOUSE GAS EMISSIONS

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as greenhouse gases (GHGs), into the atmosphere. The primary source of these GHG is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide (CO_2), methane (CH_4), and ozone (O_3)—that are the likely cause of an increase in global average temperatures observed within the 20th and 21st centuries. Other GHG identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N_2O), sulfur hexafluoride (SF_6), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons.[3]

Information on manufacturing of cement, steel, and other "life cycle" emissions that would occur as a result of the proposed project are not applicable and are not included in the analysis.[4] Black carbon emissions are not included in the GHG analysis because the California Air Resources Board (CARB) does not include this short-lived climate pollutant in the state's Senate Bill 32 (SB 32) and Assembly Bill (AB 1279) inventory but treats it separately.[5] A background discussion on the GHG regulatory setting and GHG modeling can be found in Appendix A to this Initial Study.

Would the project:

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

Less Than Significant Impact. Global climate change is not confined to a particular project area and is generally accepted as the consequence of global industrialization over the last 200 years. A typical project, even a very large one, does not generate enough greenhouse gas emissions on its own to influence global climate

[3] Water vapor (H_2O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant, but part of the feedback loop rather than a primary cause of change.

[4] Life cycle emissions include indirect emissions associated with materials manufacture. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of their particular activity. The California Resources Agency, in adopting the CEQA Guidelines Amendments on GHG emissions found that lifecycle analyses was not warranted for project-specific CEQA analysis in most situations, for a variety of reasons, including lack of control over some sources, and the possibility of double-counting emissions (CNRA 2018). Because the amount of materials consumed during the operation or construction of the Project is not known, the origin of the raw materials purchased is not known, and manufacturing information for those raw materials are also not known, calculation of life cycle emissions would be speculative. A life-cycle analysis is not warranted (LCI 2008).

[5] Particulate matter emissions, which include black carbon, are analyzed in Section 3.3, Air Quality. Black carbon emissions have sharply declined due to efforts to reduce on-road and off-road vehicle emissions, especially diesel particulate matter. The state's existing air quality policies will virtually eliminate black carbon emissions from on-road diesel engines within 10 years (CARB 2017).

change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact.

Based on information provided by DJ&A, the proposed project would generate 646 daily trips (Appendix K). However, because a portion of these trips would be generated by employees currently working at the existing District office, implementation of the proposed project would not result in a substantial increase in vehicle trips or mobile source emissions within the District. In addition, the proposed project would include EV-charging stations and solar canopies over the parking areas in compliance with applicable CALGreen and Energy Code requirements, which would help reduce reliance on fossil fuels and support increased use of electric vehicles and renewable electricity. The new education center would also result in an increase in water demand, wastewater and solid waste generation, area sources (e.g., consumer cleaning products), energy usage (i.e., natural gas and electricity), and emissions associated with the operation of the emergency generator. Because the generator would run only during maintenance, testing, or in times of emergency, its operation would not represent a substantial source of GHG emissions. Annual average construction emissions were amortized over 30 years and included in the emissions inventory to account for one-time GHG emissions from the construction phase of the proposed project.

While the proposed project would include solar canopies over the parking areas that would satisfy approximately 65 percent of the parking area's total annual electricity, this is not accounted for in the energy-source emissions estimates provided herein as a conservative assessment of potential proposed project emissions should the design or performance of the system change. As shown in Table 9, *Project-Related Operation GHG Emissions*, construction and operation of the proposed project would not generate annual emissions that exceed the South Coast AQMD bright-line threshold of 3,000 metric tons of carbon dioxide equivalence ($MTCO_2e$) per year (South Coast AQMD 2010). Therefore, the proposed project's cumulative contribution to GHG emissions would be less than significant.

Table 9 Project-Related Operation GHG Emissions

Source	GHG ($MTCO_2e$/Year)
Mobile	400
Area	1
Energy	201
Water	14
Solid Waste	13
Refrigerants	<1
Stationary (Emergency Generator)	3
30-Year Construction Amortization[1]	19
Total	651
South Coast AQMD Bright-Line Threshold	3,000 $MTCO_2e$/Yr
Exceeds Bright-Line Threshold?	**No**

Source: CalEEMod, Version 2022.1.
Notes: MTons = metric tons; $MTCO_2e$ = metric ton of carbon dioxide equivalent
[1] Total construction emission are amortized over 30 years per South Coast AQMD Working Group methodology (South Coast AQMD 2008b).

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

Less Than Significant Impact. Applicable plans adopted for the purpose of reducing GHG emissions include CARB's Scoping Plan and the Southern California Association of Governments' (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). A consistency analysis with these plans is presented below.

CARB Scoping Plan

CARB's latest Climate Change Scoping Plan (2022) outlines the State's strategies to reduce GHG emissions in accordance with the targets established under AB 32, SB 32, and AB 1279 (CARB 2022). The Scoping Plan is applicable to State agencies and is not directly applicable to cities/counties and individual projects. Nonetheless, the Scoping Plan has been the primary tool that is used to develop performance-based and efficiency-based CEQA criteria and GHG reduction targets for climate action planning efforts.

Statewide strategies to reduce GHG emissions in the 2022 Climate Change Scoping Plan include: implementing SB 100, which expands the RPS to 60 percent by 2030; expanding the Low Carbon Fuel Standards (LCFS) to 18 percent by 2030; implementing the Mobile Source Strategy to deploy zero-emission electric buses and trucks; implementing the Sustainable Freight Action Plan; implementing the Short-Lived Climate Pollutant Reduction Strategy, which reduces methane and hydrofluorocarbons to 40 percent below 2013 levels by 2030 and black carbon emissions to 50 percent below 2013 levels by 2030; continuing to implement SB 375; creating a post-2020 Cap-and-Trade Program; and developing an Integrated Natural and Working Lands Action Plan to secure California's land base as a net carbon sink.

Statewide strategies to reduce GHG emissions include the low carbon fuel standards, California Appliance Energy Efficiency regulations, California Renewable Energy Portfolio standard, changes in the CAFE standards, and other early action measures as necessary to ensure the State is on target to achieve the GHG emissions reduction goals of AB 32, SB 32, and AB 1279. In addition, new developments are required to comply with the current Building Energy Efficiency Standards and CALGreen. The proposed project would comply with these GHG emissions reduction measures since they are statewide strategies. Therefore, the proposed project would not obstruct implementation of the 2022 Scoping Plan, and impacts would be less than significant.

SCAG's Regional Transportation Plan/Sustainable Communities Strategy

SCAG adopted the 2024-2050 RTP/SCS, Connect SoCal, in April 2024. Connect SoCal is a long-term plan for Southern California region that details the development, integrated management and operation of transportation systems and facilities that will function as an intermodal transportation network for the SCAG metropolitan planning area (SCAG 2024). This plan outlines a forecast development pattern that demonstrates how the region can sustainably accommodate needed housing and job centers with multimodal mobility options. The overarching vision is to expand alternatives to driving, advance the transition to clean-transportation technologies, promote integrated and safe transit networks, and foster transit-oriented development in compact and mixed-use developments (SCAG 2024). In addition, Connect SoCal is supported

by a combination of transportation and land use strategies that outline how the region can achieve California's GHG-emission-reduction goals and federal Clean Air Act requirements. The projected regional development, when integrated with the proposed regional transportation network in Connect SoCal, would reduce per-capita GHG emissions related to vehicular travel and achieve the GHG reduction per capita targets for the SCAG region.

The Connect SoCal Plan does not require that local general plans, specific plans, or zoning be consistent with the SCS, but provides incentives for consistency to governments and developers. The new education center would continue to serve as a District office, and the outdoor event space would primarily function as an accessory space to other functions at the education center. In addition to the District's use, the outdoor event center may also be used by the community in accordance with the Civic Center Act. As described in Section 3.11, *Land Use and Planning*, the proposed project would be consistent with the existing land use designation of Mixed-Use Urban, which permits residential, commercial, office, and public/institutional uses. Therefore, the proposed project would not interfere with SCAG's ability to implement the regional strategies outlined in the Connect SoCal Plan, and impacts would be less than significant.

3.9 HAZARDS AND HAZARDOUS MATERIALS

Would the project:

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

Less Than Significant Impact.

Construction

The proposed project would include grading, construction of new buildings, and excavation. Construction of the proposed project would require small amounts of hazardous materials such as vehicle fuels, lubricants, grease and transmission fluids, paints, and coatings. The handling, use, transport, and disposal of hazardous materials during the construction phase of the proposed project would comply with existing regulations of several agencies—the US Environmental Protection Agency (EPA), California Division of Occupational Safety and Health (Cal/OSHA), United States Occupational Safety and Health Administration, and United States Department of Transportation. In the event that a spill occurs, supplies are maintained on-site for containing and cleaning small spills of hazardous materials. Project construction workers are trained on the proper use, storage, and disposal of hazardous materials. Construction activities associated with the proposed project would be from approximately September of 2026 and end in January 2028 and would be one time in nature, which further limits the use of these materials onsite.

Construction activities would also be conducted in accordance with the SWPPP as part of the NPDES permit. The primary objective of the SWPPP is to identify, construct, implement, and maintain BMPs to reduce or eliminate pollutants in stormwater discharges and authorized non-storm water discharges from the construction site. BMPs for hazardous materials may include, but are not limited to, off-site refueling, placement of generators on impervious surfaces, establishing cleanout areas for cement, etc. Adherence to existing

regulations would ensure compliance with safety standards related to the use, storage, transport, and disposal of hazardous materials and with the safety procedures mandated by applicable federal, state, and local laws and regulations.

There is nothing unique about the construction of the proposed project or the project site that could create significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Compliance with applicable federal, state, and local laws and regulations governing the use, storage, transport, and disposal of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur. Therefore, the proposed project construction would not create substantial hazards to the public or the environment. Impacts would be less than significant.

Operation

Project operation would involve the use of small amounts of hazardous materials that are typical of a district office use, such as cleansers, paints, degreasers, adhesive, sealers, fertilizers, and pesticides for cleaning and maintenance purposes. The use, storage, transport, and disposal of these hazardous materials during the operation of the proposed project would be governed by existing regulations of several agencies, including the US Environmental Protection Agency, US Department of Transportation, California Division of Occupational Safety and Health, Orange County Health Care Agency, Environmental Health Division, and Orange County Fire Authority (OCFA) similar to the construction phase. Compliance with applicable laws and regulations governing the use, storage, transportation, and disposal of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts.

Due to these materials being common cleaning and maintenance materials, their limited quantity and use onsite, along with compliance with regulatory requirements, the proposed project would not create a significant hazard to the public or the environment from the routine use, storage, transport, and disposal of hazardous materials and impacts would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact With Mitigation Incorporated. A Phase I Environmental Site Assessment (ESA) was prepared for the project site in May 2025 (see Appendix E). The objective of the Phase I ESA was to evaluate whether current or previous land use at or adjacent to the project site may have involved, or resulted in the use, storage, disposal, treatment, and/or release of hazardous substances to the environment, resulting in the determination of a Recognized Environmental Condition (REC) at the project site. A REC is defined by the updated American Society for Testing and Materials E1527-21 as (1) the presence of hazardous substances or petroleum products in, on, or at the "Subject Property" due to a release to the environment; (2) the likely presence of hazardous substances or petroleum products in, on, or at the "Subject Property" due to a release or likely release to the environment; and (3) the presence of hazardous substances or petroleum products in, on, or at the "Subject Property" under conditions that pose a material threat of a future release to the environment.

3. Environmental Analysis

The Phase I ESA identified that the former MCAS facility has a contaminated groundwater plume, containing solvents and polyfluoroalkyl substances (PFAS), which has migrated towards the northwest property boundary of the project site. Additionally, the Phase I ESA identified and documented approximately 30 to 40 existing soil piles located near the south-central portion of the project site and recommended testing of these soils. As a result of the RECs, the Phase I ESA concluded that a Phase II ESA would be needed to assess potential impacts from the identified RECs.

The Phase II ESA was completed in December 2025, which included collecting soil, soil gas, and groundwater samples at the project site and comparing the results to established regulatory environmental screening levels (see Appendix G). Five locations were chosen on the project site to collect samples. Soil gas and groundwater samples were collected using a push drill rig and were collected at depths of approximately 5-feet and 10-feet. Soil samples from the existing soil piles were collected at four separate locations utilizing hand-held equipment and placing the samples in stainless steel sampling sleeves. Sampling locations can be seen in Plates 3 through 6 in Appendix G. All collected soil, soil gas, and groundwater samples were delivered under chain-of-custody procedures to a State of California-certified laboratory for chemical analyses.

The findings of the Phase II ESA for soil, soil gas, and groundwater samples collected at the project site were evaluated using appropriate regulatory screening levels (or thresholds) which included the San Francisco Bay Regional Water Quality Control Board's Environmental Screening Levels, the DTSC Human Health Risk Assessment (HHRA) Note No.3, or the US EPA's Region 9 Screening Levels (RSLs) updated in November 2024. Laboratory testing on the samples collected from the soil piles concluded that total petroleum hydrocarbons, volatile organic compounds (VOCs), organochlorine pesticides, polychlorinated biphenyls, or metals were below their respective thresholds.

Laboratory testing of the soil gas samples found that concentrations of benzene in all soil gas samples ranged from 12 to 24 $\mu g/m^3$ across the project site, which is above the residential environmental screening level (ESL) for benzene in soil gas is 3.2 $\mu g/m^3$. No VOCs were identified in collected soil gas samples at or above their respective environmental screening levels.

Finally, two polyfluoroalkyl substance compounds were identified above RWQCBs ESLs in all groundwater samples collected across the project site and include perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS). Concentrations of PFOA ranged from 220 to 3,000 ng/L and concentrations of PFOS ranged from 150 to 5,000 ng/L. The ESL for PFOA is 0.0027 ng/L, and the ESL for PFOS is 2 ng/L. VOCs in the groundwater samples were identified at or below their respective regulatory screening levels.

The Phase II ESA concluded that soil gas and groundwater located beneath the project site have been impacted from historic operations of the former MCAS facility which created the contaminated groundwater plume. For benzene contamination according to Cal OSHA, the Permissible Exposure Limit (PEL) for benzene is 1 parts per million (ppm) (DIR 2014). The PEL is defined as the maximum permitted 8-hour time-weighted average concentration of an airborne contaminant. The highest concentration of benzene in soil vapor identified at the project site was 0.024 ppm (Appendix G). Therefore, benzene concentrations identified in soil vapor are well below the PEL and will not pose a threat during construction activities.

Though the proposed project would not be impacted during the construction phase by the benzene concentrations identified in soil vapor, the operation phase would be impacted. Specifically, the Phase II ESA found the presence of relatively low levels of benzene in soil gas beneath the project site, but above the ESL screening threshold. To mitigate the low levels of benzene, Mitigation Measure HAZ-1 would be implemented and would include the installation of a passive vapor intrusion mitigation system (VIMS). The VIMS would include installing a sub-slab vapor barrier during building construction, in combination with the incorporation of a passive venting system. As such, the incorporation of these building design features would mitigate the risk associated with benzene exposure during the operation phase of the proposed project.

The Phase II ESA concluded that the PFAS (PFOA and PFOS) compounds found in the groundwater beneath the project site to be above the ESL screening threshold do not pose a possible exposure risk to site occupants because PFAS are not volatile, meaning they do not turn into vapor that could disperse. Further, the proposed project does not include any subterranean levels and would not intrude into groundwater onsite. As discussed in Section 3.10(b), the proposed project does not include wells and would not extract groundwater. Tustin's Water Services Division would provide potable water to the proposed project (Appendix G). With the installation of a VIMS under the education center slab and passive ventilation, and since the proposed project would not impact groundwater onsite, the proposed project would not create a significant hazard to the public or the environment during construction and operation. Additionally, the existing soil piles at the project site can be characterized as "clean fill material" which means the soil from the existing soil piles are free of hazardous substances and debris and are suitable for reuse without posing environmental or health risks.

As stated in Section 3.9(a), construction of the proposed project would require small amounts of hazardous materials such as vehicle fuels, lubricants, grease and transmission fluids, paints, and coatings, and the operation phase would utilize small amounts of hazardous materials, such as cleansers, paints, degreasers, adhesive, sealers, fertilizers, and pesticides for cleaning and maintenance purposes. The proposed project would comply with hazardous materials laws and regulations related to the proper handling and management of hazardous materials. The small amounts of hazardous materials used during the construction and operation phases would not create a significant hazard to the public or the environment through upset and accident conditions.

With the implementation of Mitigation Measure HAZ-1, the proposed project would not 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. Impacts would be less than significant with mitigation incorporated.

Mitigation Measure

HAZ-1 Prior to construction of the proposed project, the District shall retain a qualified engineering firm that has expertise in designing and installing vapor intrusion mitigation system (VIMS) to design and incorporate a VIMS into the construction plans for the proposed building including a sub-slab vapor barrier during building construction and a passive venting system. The VIMS shall be designed and installed be in accordance with the California Department of Toxic Substances Control's (DTSC) guidance. The District shall submit updated design

plans to the Department of General Services, Division of State Architect for review and approval of the VIMS.

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

Less Than Significant Impact. The Legacy Magnet Academy is located south of the project site, across Legacy Road (see Figure 3). No other existing or proposed schools are located within one-quarter mile of the project site. As stated in Section 3.9(a), construction and operation of the proposed project would require the use of small amounts of hazardous materials, which would be handled and managed in compliance with hazardous materials laws and regulations. As such, the small amounts of these materials along with their typical and standard use during construction and operational cleaning and maintenance would not emit hazardous emissions and do not represent hazardous materials that could impact the Legacy Magnet Academy.

As discussed in Section 3.9(b), two hazardous materials, benzene and PFAS, were found in soil vapor and groundwater onsite, respectively. As stated in Section 3.9(b), benzene concentrations identified in soil vapor are well below the PEL and construction mitigation measures are not required. However, the proposed project would be required to implement a VIMS under the proposed education center building to prevent vapor intrusion, which could contain benzene, into the proposed building. The presence of benzene in the soil vapor onsite does not constitute a hazardous condition that could affect offsite properties, including the Legacy Magnet Academy. Further, the Phase II ESA concluded that the PFAS compounds found on the project site do not include a possible exposure risk since the proposed project would not impact groundwater onsite (Appendix G). The presence of PFAS compounds onsite do not constitute a hazardous condition that could affect offsite properties, including the Legacy Magnet Academy.

The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, impacts would be less than significant.

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

Less Than Significant Impact with Implementation of Mitigation. California Government Code Section 65962.5 requires the Department of Toxic Substances Control (DTSC), the State Department of Health Services (DHS), the State Water Resources Control Board (SWRCB), and local enforcement agencies to compile and update lists of hazardous materials sites. The DTSC is responsible to maintain a list of all hazardous waste facilities subject to corrective action; all land designated as a hazardous waste property or border zone property; all information received on hazardous waste disposals on public lands; and all sites listed pursuant to Article 5 (commencing with Section 78760) of Chapter 4 of Part 2 of Division 45 of the Health and Safety Code. The DHS is responsible to maintain a list of all public drinking water wells that contain detectable levels of organic contaminants and that are subject to water analysis. SWRCB is responsible to maintain a list of all underground storage tanks for which an unauthorized release report; all solid waste disposal facilities from which there is a migration of hazardous waste and for which a California regional water quality control board has notified the

DTSC; and all cease and desist orders issued after January 1, 1986 and all cleanup and abatement orders issued after January 1, 1986 that concern the discharge of wastes that are hazardous materials. The local enforcement agency is responsible to maintain a list of all solid waste disposal facilities from which there is a known migration of hazardous waste; the Department of Resources Recycling and Recovery (CalRecycle) is responsible to compile the local lists into a statewide list.

Seven environmental lists were searched for hazardous materials on and within one-quarter mile of the project site:

- **GeoTracker.** State Water Resources Control Board (SWRCB 2025)
- **EnviroStor.** Department of Toxic Substances Control (DTSC 2025a)
- **EnviroMapper.** US Environmental Protection Agency (USEPA 2025)
- **Solid Waste Information System (SWIS).** California Department of Resources Recovery and Recycling (CalRecycle 2025)
- **Cortese List.** Department of Toxic Substances Control (DTSC 2025b)
- **CalEPA.** California EPA (CalEPA 2025)
- **Well Finder.** Geologic Energy Management Division (CalGEM)(DOC 2025h)

The results of searching through the seven environmental lists mentioned above are included in Table 10, *Hazardous Material Sites On-Site or within 0.25 Mile of the Project Site.*

Table 10 Hazardous Material Sites On-Site or Within 0.25 Mile of the Project Site

Site Address	Database	Identifier	Cleanup Status	Proximity to Site
USMC Air Station Tustin Tustin, CA (CA9170090022)	EnviroStor	Hazardous Waste Facility	Closed in 1998	1,129 feet southwest
US Marine Corps Air Station Tustin – OU – 1B – IRP – 12 Drum Storage Area No. 2 Tustin, CA (DOD100395500)	GeoTracker	Other Chlorinated Hydrocarbons, PFAS, Trichloroethylene	Open – Remediation as of 12/4/2007 for the groundwater contaminate plume	726 feet west; Groundwater plume extends beneath the western portion of the project site
US Marine Corps Air Station Tustin – OU – 4A – IRP – 11(Area A) Drum Storage Area No. 1 Tustin, CA (DOD100395300)	GeoTracker	Asbestos Containing Materials, Dichlorvos, Metals, Petroleum, Polychlorinated Biphenyls, Polyfluorinated Alkylated Substances,	Completed – Case Closed as of 12/16/2004	408 feet north

3. Environmental Analysis

Table 10 Hazardous Material Sites On-Site or Within 0.25 Mile of the Project Site

Site Address	Database	Identifier	Cleanup Status	Proximity to Site
		Polynuclear Aromatic Hydrocarbons, Volatile Organics		
US Marine Corps Air Station Tustin Bldg. 534/Burn Pit Tustin, CA (T0605900982)	GeoTracker	Aviation	Completed – Case Closed as of 4/6/2000	844 feet southwest
USMCAS Tustin UST 534A, 534B, 534C Tustin, CA (T0605902259)	GeoTracker	Aviation, Waste Oil/Motor Oil/Hydraulic/Lubricating	Completed – Case Closed as of 4/6/2000	844 feet southwest
USMCAS Tustin UST 90 Tustin, CA (T0605986620)	GeoTracker	Heating Oil/Fuel Oil	Completed – Case Closed as of 1/5/2005	643 feet north
US Marine Corps Air Station Tustin – OU – 4B – IRP – 11(Area B) Drum Storage Area No. 1 Tustin, CA (DOD100395400)	GeoTracker	Polynuclear Aromatic Hydrocarbons, Trichloroethylene, Waste Oil/Motor Oil/Hydraulic/Lubricating	Completed – Case Closed as of 11/3/2021	584 feet north
USMCAS Tustin UST 28A Tustin, CA (T0605947657)	GeoTracker	Diesel	Completed – Case Closed as of 1/21/1997	1,184 feet west
USMC Air Station Tustin Tustin, CA (CA9170090022)	CalEPA	Hazardous Waste Facility	Closed in 1998	1,129 feet southwest
Caretaker Site Office USMC Air Station (Helicopter) Tustin, CA (80001281)	CalEPA	Not Specified	Closed in 1998	871 feet southwest
US Marine Corps Air Station Tustin – OU – 1B – IRP – 12 Drum Storage Area No. 2 Tustin, CA (DOD100395500)	CalEPA	Other Chlorinated Hydrocarbons, PFAS, Trichloroethylene	Open – Remediation as of 12/4/2007	726 feet west
US Marine Corps Air Station Tustin – OU – 4A – IRP – 11(Area A) Drum Storage Area No. 1 Tustin, CA (DOD100395300)	CalEPA	Asbestos Containing Materials, Dichlorvos, Metals, Petroleum, Polychlorinated Biphenyls, Polyfluorinated Alkylated Substances, Polynuclear Aromatic Hydrocarbons, Volatile Organics	Completed – Case Closed as of 12/16/2004	408 feet north

Table 10 Hazardous Material Sites On-Site or Within 0.25 Mile of the Project Site

Site Address	Database	Identifier	Cleanup Status	Proximity to Site
US Marine Corps Air Station Tustin – OU – 4B – IRP – 11(Area B) Drum Storage Area No. 1 Tustin, CA (DOD100395400)	CalEPA	Polynuclear Aromatic Hydrocarbons, Trichloroethylene, Waste Oil/Motor Oil/Hydraulic/Lubricating	Completed – Case Closed as of 11/3/2021	584 feet north

Source: USEPA 2024b; CalEPA 2025.

One site was listed within one-quarter mile radius of the project site. The US Marine Corps Air Station Tustin – OU – 1B – IRP – 12 Drum Storage Area No. 2 site is located within the Tustin Legacy Plan area and on the former MCAS Air Station and is listed in the GeoTracker and CalEPA environmental lists. The hazardous waste identified on the site includes Other Chlorinated Hydrocarbons, PFAS, and Trichloroethylene. The cleanup status of the site is Open – Remediation which means that an approved remedy or remedies has/have been selected for the impacted media at the site and the responsible party (RP) is implementing one or more remedies under an approved cleanup plan for the site. Additionally, the listing has been in remediation since December 4, 2007. In the case of this listing the RP is the Department of Defense, and the impacted media includes the aquifer used for drinking water supply, other groundwater (uses other than drinking water), and soil. While this listed site is located approximately 726 feet west of the project site, the Phase I ESA and Phase II ESA inferred that the groundwater plume extends onto the west side of the project site. With the implementation of Mitigation Measure HAZ-1, the proposed project would result in less than significant impacts related to the onsite soil vapor contamination and no mitigation measures are required to address the onsite groundwater contamination. Refer to Section 3.9(b) above for further discussion. While the project site is not located on a list of hazardous material sites, the presence of the groundwater plume from a listed site affects the proposed project area. Implementation of HAZ-1 would ensure that impacts are less than significant, and the development of the proposed project would not create a significant hazard to the public or the environment.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles or a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The project site is approximately 3.7 miles southwest of John Wayne Airport. The project site is not located within a John Wayne Airport Impact Zone (OC ALUC 2008). Therefore, the proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area, and no impact would occur.

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

Less Than Significant Impact. The City of Tustin has prepared an Emergency Operations Plan (EOP), a multi-hazard preparedness document intended to be reviewed, understood, and exercised before an emergency occurs. Because the project site is located within the City of Tustin, the EOP applies to the proposed project.

3. Environmental Analysis

The EOP does not identify any designated evacuation routes (Tustin 2019). However, the General Plan Figure PS-1, Evacuation Routes, identified several evacuation routes, with the closest evacuation route being Edinger Avenue approximately 0.40 miles northeast of the project site (Tustin 2018). As discussed in Section 1.3, *Project Description*, the project site includes an existing driveway along Legacy Road but would include installing an additional driveway along Legacy Road and a driveway along Valencia Avenue to provide access to the proposed public and secured parking lots (see Figure 5). Construction of these driveways would comply with City design requirements for new driveways, would be reviewed and approved the City of Tustin and would not interfere with a City-designated evacuation route since no identified evacuation route borders the project site. The construction of the proposed project may result in temporary roadway lane closures for utility connections. Such lane closures would be temporary and coordinated with the City of Tustin to ensure that they do not substantially interfere with circulation. Temporary lane closures during construction would not interfere with any City-designated evacuation routes, since none border the project site. Other project components, such as the outdoor event space and education center, would be constructed entirely within the project site, with no off-site construction or staging.

The outdoor event space would serve as an accessory area for District activities and may also be available for community use in accordance with the Civic Center Act. Activities within this space would require parking, which would be accommodated by the project's provision of 256 on-site parking spaces, thereby minimizing potential interference with evacuation routes. Additionally, off-site parking is not permitted along Valencia Avenue or Legacy Road, further reducing the potential for interference.

Therefore, the proposed project would not physically interfere with an adopted emergency response plan, emergency evacuation plan, nor evacuation routes. Impacts would be less than significant.

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

Less Than Significant Impact. A wildland fire hazard area is typically characterized by areas with limited access, rugged terrain, limited water supply, and combustible vegetation. The project site is in a local responsibility area (LRA) and not in a very high FHSZ (Cal Fire 2025). The nearest FHSZ is approximately 4 miles north of the project site and designated as a moderate FHSZ in a LRA. The nearest very high FHSZ in an LRA is approximately 4.4 miles north of the project site, near Peters Canyon South Trailhead. The project site does not abut a very high FHSZ and is not located within the Wildlife Urban Interface (WUI) (SILVIS 2025).

As seen in Figure 3, and as stated in Section 1.2, *Environmental Setting*, the project site is predominately surrounded by urban uses including vacant land and residential uses to the north; a decommissioned MCAS Tustin blimp hangar and MCAS buildings to the west; vacant lands, a construction site, and the Legacy Magnet Academy to the south; and commercial uses to the east. Additionally, the proposed project would be designed in accordance with the California Building Code and California Fire Code and project design plans would be reviewed by the DSA. The proposed project would adhere to any applicable OCFA requirements. Therefore, the proposed project would not expose people or structures to significant risk of loss, injury, or death involving wildland fires, and impacts would be less than significant.

3.10 HYDROLOGY AND WATER QUALITY

Would the project:

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

Less Than Significant Impact. Urban runoff from storms or nuisance flows (runoff during dry periods) from development projects can carry pollutants to receiving waters. Runoff can contain pollutants such as oil, fertilizers, pesticides, trash, and sediment. This runoff can flow directly into local streams or into storm drains and continue through stormwater pipes until it is released untreated into a local waterway and eventually the ocean. Untreated stormwater runoff degrades water quality in surface waters and groundwater and can affect drinking water, human health, and plant and animal habitats. Additionally, water quality in Tustin is regulated by the Santa Ana Regional Water Quality Control Board and its Water Quality Control Plan (Santa Ana River Basin Plan), which contains water quality standards and identifies beneficial uses for receiving waters along with water quality criteria and standards necessary to support these uses consistent with federal and state water quality laws.

The construction and operational phases of the proposed project could have the potential to impact water quality. The following is a discussion of the potential impacts that the construction and operational phases of the proposed project could have on water resources and quality.

Construction

Clearing, grading, excavation, and construction activities associated with the proposed project may impact water quality through soil erosion and increasing the amount of silt and debris carried in runoff. Additionally, the use of construction materials such as fuels, solvents, and paints may present a risk to surface water quality. Finally, the refueling and parking of construction vehicles and other equipment on-site during construction may result in oil, grease, or related pollutant leaks and spills that may discharge into the storm drain system.

The proposed project would be required to comply with all applicable regulatory requirements governing water quality. The proposed project would be required to comply with the National Pollutant Discharge Elimination System Construction General Permit (CGP) (2022-0057-DWQ). The CGP requires the preparation of a Stormwater Pollution Prevention Plan (SWPPP) that incorporates BMPs to control sedimentation, erosion, and hazardous materials contamination of runoff during construction. The State Water Resource Control Board (SWRCB) mandates that projects that disturb one or more acres of land must obtain coverage under the Statewide CGP. Prior to the start of construction activities, the project applicant must file Permit Registration Documents (PRD) with the SWRCB, which includes a Notice of Intent, risk assessment, site map, annual fee, signed certification statement, SWPPP, and post-construction water balance calculations. The construction contractor is required to maintain a copy of the SWPPP on-site at all times and implement all construction BMPs identified in the SWPPP during construction activities. Prior to the commencement of a grading activities, the project applicant is required to provide proof of filing of the PRDs with the SWRCB.

3. Environmental Analysis

The SWPPP must describe construction BMPs that address pollutant source reduction and provide measures/controls to mitigate potential pollutant sources. These include, but are not limited to:

- Erosion controls (e.g., earth dikes and swales, mulching, slope drains, compost blankets)
- Sediment controls (e.g., silt fence, sediment trap, sandbag or straw bale barriers)
- Tracking controls (e.g., stabilized construction entrance/exit, tire wash)
- Nonstorm water management (e.g., dewatering practices, vehicle and equipment cleaning)
- Materials and waste management (e.g., material storage, hazardous waste management, soil management)
- Good housekeeping practices

Submittal of the PRDs and implementation of the SWPPP and its associated BMPs throughout the construction phase would result in an impact of less than significant.

Operation

Once the proposed project has been constructed, urban runoff could include a variety of contaminants that are typical of operation of office uses, that could impact water quality. The proposed project would be required to comply with applicable federal and state laws and local regulations governing the use, storage, transport, and disposal of hazardous materials and would ensure impacts would be less than significant.

The proposed project is required to comply with the post-construction performance standards under the SWRCB's construction general permit. Additionally, requirements for waste discharges to stormwater from operation of developed land uses are set forth in the Municipal Stormwater Permit (MS4 Permit), Order No. R8-2009-0030 as amended by Order R8-2010-0062, issued by the Santa Ana Regional Water Quality Control Board (RWQCB). The proposed project is required to prepare and implement a WQMP pursuant to the MS4 Permit, specifying BMPs to be used during project design and operation to minimize stormwater pollution. The WQMP is required to be prepared in accordance with the Model Water Quality Management Plan and Technical Guidance Document. The WQMP would be submitted to SWRCB and the City of Tustin for review and approval. In compliance with the MS4 Permit, specific nonstructural and structural source control BMPs would be incorporated into the proposed project. Typical site-design BMPs and source-control BMPs include the examples below. The proposed project would use a combination of BMPs to meet SWRCB's requirements.

Site Design BMPs

Site design BMPs would be incorporated into the project's design to reduce the potential impacts on surface and groundwater quality. These may include, but are not limited to:

- Maximizing pervious areas and minimizing directly connected impervious areas
- Using on-site ponding areas (i.e., at-grade detention basins)

- Constructing hardscape with permeable materials and implementing hydrologically functional landscape design.
- Incorporating trees, open space, and landscaping to mitigate urban heat island impacts.
- Including mostly native plants and drought-tolerant plants in landscaping plans.
- Using effective irrigation systems to minimize water usage.

Source Control BMPs

Source control BMPs effectively minimize the potential for typical urban pollutants to contact stormwater, thereby limiting water quality impacts downstream. Source control BMPs would be incorporated into the proposed project and implemented throughout the operation of the District office. These BMPs could include the following:

- Educational uses related to urban runoff provided to all employees, and staff.
- Inspection and maintenance of site BMPs—catch basins, grate inlets, etc.
- Providing storm drain stenciling or signage on all storm drain inlets and catch basins.
- Properly designing and inspecting all trash storage areas, loading docks, outdoor storage areas, and outdoor work areas on a regular basis.

As part of the statewide mandate to reduce trash in receiving waters, the proposed project would adhere to the requirements of the SWRCB Trash Amendments. The requirements include the installation and maintenance of full-capture trash screening devices at curb inlets, grate inlets, and catch basin inlets. The trash screening devices must be certified by the SWRCB. Furthermore, the proposed project would be required to meet the City of Tustin's water quality control ordinance (Ord. No. 1275, Sec. 3, 11-17-03) and water management plan ordinance (Ord. 1477, Sec. 3, 3-21-17). With the implementation of the BMP features, described above, to control the amount and quality of the stormwater leaving the project site, and compliance with State and local regulations, the proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Thus, impacts would be less than significant.

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

Less Than Significant Impact. The project site is located within the Coastal Plain of Orange County basin (OC Basin), which is classified as a medium priority basin due to heavy reliance on the Basin's groundwater as a source of water supply (SGMA 2025). The City is a retail water supplier that provides water to its residents and other customers using the imported potable water from Municipal Water District of Orange County (MWDOC), obtained through Irvine Ranch Water District (IRWD), and local groundwater from the Orange County Groundwater Basin (OC Basin), which is managed by the Orange County Water District (OCWD). The City operates 13 wells and 6 reservoirs with a combined storage capacity of approximately 13.83 million

gallons. The City's main source (96 percent) of water supply is groundwater from the OC Basin, and imported water (4 percent) makes up the rest of the City's water supply (Tustin 2020). OCWD's Groundwater Replenishment System (GWRS) produces recycled water for indirect potable reuse (IPR) through the replenishment of the OC Basin. The OC Basin is recharged by recycled water, stormwater along the Santa Ana River, recharge basins, and surface water flows (Tustin 2020; DWR 2004).

The project site is vacant, though disturbed by the former MCAS uses. Stormwater from the project site percolates into the ground in pervious areas. The proposed project would result in an increase in impervious surfaces compared to existing conditions with the construction of a new education center and an outdoor event space with parking infrastructure, hardscaping, and other project components. Stormwater runoff would be directed into newly constructed storm drains on-site, percolate into the ground, and flow into storm drains in the public right-of-way. No water features (e.g., streams or creeks) that serve the purpose of groundwater recharge for the area are in the project vicinity. The project site is not used for groundwater recharge activities, nor does it represent a significant or important source of groundwater recharge or extraction. The proposed project does not propose groundwater wells that would extract groundwater from the aquifer, and it would not substantially interfere with groundwater supplies or recharge. Therefore, impacts to groundwater supplies would be less than significant.

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 a substantial erosion or siltation on- or off-site?

Less Than Significant Impact. Erosion and siltation impacts that could result from alteration of drainage patterns would, for the most part, occur during the proposed project's construction phase, which would include site preparation and grading activities. Environmental factors that affect erosion include topography, soil type, wind, and rainfall. Siltation is associated with sediment transport and deposition in waterways. The proposed project would not involve the alteration of any natural drainage channels or any watercourse, since none exist onsite. The proposed project would result in an increase of impervious surfaces compared to existing conditions. The proposed project's construction includes grading, utilities trenching, and asphalt demolition. If not controlled, the transport of soil from earthwork to local waterways could temporarily increase suspended sediment concentrations and release pollutants attached to sediment particles into local waterways.

As discussed in Impact 3.10(a), the proposed project would be required to submit PRDs and a SWPPP to the SWRCB for approval prior to the commencement of construction activities. The SWPPP would describe the BMPs to reduce the impact of erosion and siltation (as described above). The operational phase of the project would be required to comply with State and local regulations which would include SWRCB Trash Amendments, site design, and source control BMPs, as described in Section 3.10(a), to reduce erosion and siltation. Implementation of the project BMPs during the construction phase and operational phase would therefore ensure that erosion and siltation impacts would be less than significant.

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

Less Than Significant Impact. The proposed project would develop the vacant but disturbed land on-site; the project site would be designed to contain all soils on-site during operation. The proposed project would not involve the alteration of any natural drainage or watercourse, as none exist on-site. The proposed project would substantially alter the existing drainage of the vacant project site. The proposed project would connect to the existing stormwater infrastructure on-site and would direct runoff from the proposed project to the new inlets on-site or in public rights-of-way. Although the proposed project would result in an increase of impervious surfaces on the project site, implementation of site BMPs would control the amount and quality of the stormwater, leaving the project site as discussed in Impact 3.10(a). Thus, the proposed project would not substantially increase the rate or amount of surface runoff in a manner that would cause flooding.

The proposed project would not substantially increase the rate or amount of surface runoff in a manner that would cause flooding on or off-site. Therefore, impacts related to stormwater drainage and flooding would be less than significant.

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?

Less Than Significant Impact. The project site is vacant and contains no built structures or impervious areas. The proposed project would result in an increase in impervious surfaces compared to existing conditions, which would contribute to runoff water. The stormwater runoff from the proposed project would percolate in the ground or would be directed to the storm drains along Legacy Road and by the onsite stormwater infrastructure. The inlets on-site would connect to the stormwater infrastructure to the City and BMPs. As discussed above, construction and operation of the proposed project would be required to implement BMPs that would control the amount and quality of stormwater leaving the project site.

Construction and operation of the proposed project would use small quantities of hazardous materials, such as oil, solvents, paint, and gasoline during construction (among other materials) and chemicals used for cleaning and maintenance and paints during operation (among other materials). All potentially hazardous materials used on-site are typical of construction activities and office uses. All potentially hazardous materials would be properly handled, stored, used, and disposed of and would not represent a substantial source of pollution.

The proposed project would not exceed the capacity of existing stormwater drainage systems and would not create substantial additional sources of polluted runoff. Impacts would be less than significant.

iv) Impede or redirect flood flows?

Less Than Significant Impact. The project site is not within a Federal Emergency Management Act (FEMA) flood zone (FEMA 2025). FEMA Flood Zone X, which is defined as a moderate flood hazard area, is located approximately 0.4 mile south of the project site. The proposed project would be designed

and constructed to be consistent with CBC and other Title 24 building requirements. Since the proposed project is not within a flood zone and would be constructed in accordance with CBC, the proposed project would not substantially alter the drainage of the project site by impeding or redirecting flood flows.

According to the California Department of Water Resources' Dam Breach Inundation Map, the project site is not within any inundation area (DWR 2025). As discussed above, construction of the proposed project would not impede or redirect flood flows. With adherence to the CBC and federal, State, and local policies, the proposed project would not substantially alter the drainage of the project site, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows. Impacts would be less than significant.

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

Less Than Significant Impact. As discussed in Impact 3.10(c)(iv), the project site is not within a FEMA flood zone (FEMA 2025). Thus, with adherence to CBC, the proposed project would not substantially alter the drainage of the project site by impeding or redirecting flood flows.

A tsunami is a series of ocean waves caused by a sudden displacement of the ocean floor, most often due to earthquakes. The project site is approximately 9.5 miles inland from the Pacific Ocean, at an elevation of approximately 60 feet above mean sea level (amsl) and is outside of the tsunami hazard zone identified by the California Department of Conservation's California Tsunami Maps (DOC 2025f). Therefore, the proposed project would not risk release of pollutants due to tsunamis.

A seiche is a surface wave created when a body of water is shaken, usually by earthquake activity. Seiches are of concern relative to water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam or other artificial body of water. Although there are no large water tanks in the area that could impact the proposed project site, there are dams in the region that could create flooding impacts. As discussed in Section 3.10(c)(iv), the project site is not within any inundation area (DWR 2025). Although, the proposed project is expected to use small amounts of hazardous materials during construction and operation (e.g., paints, cleaners, oils, etc.), the construction and operation of the proposed project would be required to comply with applicable regulations for proper handling, usage, and storage of potentially hazardous materials (see Section 3.9, *Hazards and Hazardous Materials*). Additionally, due to adherence with State and local policies and DSA review, the proposed project would not release pollutants in the event of project inundation. A less than significant impact would occur.

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

Less Than Significant Impact. As previously mentioned in Impact 3.10(b), the proposed project would not substantially interfere with groundwater supplies or recharge and would not obstruct implementation of a sustainable groundwater management plan. The proposed project would be required to submit construction drawings to DSA for approval and would comply with existing local, regional, and state regulations. The proposed project would not obstruct implementation of a water quality control plan. Therefore, this impact is less than significant.

3.11 LAND USE AND PLANNING

Would the project:

a) Physically divide an established community?

No Impact. The project site is located within an urbanized area in the City of Tustin. Additionally, the project site is surrounded by vacant land and residential uses to the north; a decommissioned MCAS Tustin blimp hangar and MCAS buildings to the west; vacant lands, a construction site, and the Legacy Magnet Academy to the south; and commercial uses to the east. The project site currently exists on a vacant, disturbed parcel surrounding the Tustin Hangers. The proposed improvements would be limited to the project site. The proposed project would not change any existing roadways leading to the project site. The proposed project would not create any new land use barriers; nor would it divide or disrupt the physical arrangement of any surrounding communities. Therefore, no impact would occur.

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

No Impact. The proposed project would construct a new education center and an outdoor event space with parking infrastructure and landscaping. The project site has a Tustin General Plan designation of Tustin Legacy Specific Plan, with a zoning designation of Mixed-Use Urban (Tustin 2018a, 2025b). Permitted uses include hotel, commercial retail, commercial entertainment, public recreation, a high school, and residential uses. The proposed project would be considered office/professional development use. Under the Tustin Legacy Specific Plan's Mixed-Use Urban zoning designation, general office uses are permitted on both the ground and upper floors of buildings within this zone (Tustin 2025b). The proposed project would be developed with District offices and would only include a single floor. Therefore, development of the proposed project would not conflict with any applicable land use plans, policies, or regulations. No impact would occur.

3.12 MINERAL RESOURCES

Would the project:

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

No Impact. The City of Tustin contains Mineral Resource Zones (MRZ) 1 and 3. Based on the map, Generalized Mineral Land Classification of Orange County, California, the project site is within MRZ-1(DOC 1994). MRZ-1 are areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence. The project site is not within MRZ 2a, 2b, or 3, which are areas with known and valuable mineral resources. Additionally, the California Department of Conservation Mines Online identifies an active sand and gravel open pit mine within the city of Orange approximately 8.8 miles northwest of the project site (DOC 2025c).

Although the project site is vacant, the site has been disturbed due to MCAS's former uses. No mining activities currently exist on the project site nor near site. Construction and operation of the proposed project would not interfere with the availability of known mineral resources, since the project site is not located within MRZ 2a, 2b, or 3, and no mining activities exist on-site. Therefore, the proposed project would not result in the loss of availability of a known mineral resource valuable to the region and the state, and no impact would occur.

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

No Impact. Based on the Generalized Mineral Land Classification of Orange County, the project site is not within MRZ 2a, 2b, or 3, which are areas with known and valuable mineral resources (DOC 1994). Additionally, the California Department of Conservation Mines Online identifies an active sand and gravel open pit mine approximately 8.8 miles northwest of the project site (DOC 2025c).

The Tustin General Plan identifies a mercury-barite deposit as being a mineral resource located in the Red Hill area in the central area of the City (Tustin 2018b). The project site is not in this area but is approximately 1.5 miles south of the Red Hill area. Additionally, no mining activities currently exist on the project site or surrounding properties. Therefore, the proposed project would not result in the loss of availability of locally important mineral resource site on a local plan, and no impact would occur.

3.13 NOISE

Noise is defined as unwanted sound. It is known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Based on these known adverse effects of noise, the federal government, State of California, and City of Tustin have established criteria to protect public health and safety and to prevent disruption of certain human activities. Additional information on noise and vibration fundamentals is contained in Appendix H.

Certain land uses are particularly sensitive to noise and vibration. The City of Tustin General Plan considers residential, parks, schools, libraries, and hospitals as noise sensitive. The nearest sensitive receptors to the project site are multi-family residential uses to the east and school uses (Legacy Magnet Academy) to the south of the proposed project. Commercial uses are located to the southeast, across Liberty Road and Kensington Park Drive.

Ambient Noise Monitoring

The noise environment in the project area is primarily influenced by traffic noise on Valencia Avenue. To determine baseline noise levels in the project vicinity, ambient noise monitoring was conducted by PlaceWorks. Two short-term (15-minute) and one long-term (24-hour) measurement locations were selected and conducted around the project site. All measurements were conducted between Tuesday, August 19, and Wednesday, August 20, 2025. The short-term sound level meter (Larson Davis LxT) and the long-term sound level meter (Picollo II) used for noise monitoring satisfy the American National Standards Institute (ANSI) standard for Type 1 and Type 2 instrumentation, respectively. The sound level meters were set to "slow" response and "A" weighting (dBA). The meters were calibrated prior to and after the monitoring period. All measurements were

at least 5 feet above the ground and away from reflective surfaces. Noise measurement locations are described below and shown on Figure 7, *Approximate Noise Monitoring Locations*. Results are summarized in Table 11, *Short-Term Noise Measurements Summary in A-weighted Sound Levels*, and Table 12, *LT-1 Long-Term Noise Measurements: 62.3 dBA CNEL*.

Table 11 Short-Term Noise Measurements Summary in A-weighted Sound Levels

Monitoring Location	Description	15-Minute Noise Level, dBA						
		L_{eq}	L_{max}	L_{min}	L50	L25	L8	L2
ST-1	South of the residence at 1486 Valencia Avenue 8/19/25, 3:10 PM	63.3	74.2	44.9	61.3	64.7	67.1	70.3
ST-2	Legacy Road across the street from the project site 8/19/25, 3:38 PM	56.8	71.6	43.6	50.0	55.0	61.8	66.5

Source: Appendix H.

Table 12 LT-1 Long-Term Noise Measurements: 62.3 dBA CNEL

Time	L_{eq} (dBA)	L_{max} (dBA)	L_{50} (dBA)	L_{90} (dBA)	Time	L_{eq} (dBA)	L_{max} (dBA)	L_{50} (dBA)	L_{90} (dBA)
3:00 PM	60.1	75.0	56.1	49.1	3:00 AM	45.0	67.0	40.4	39.6
4:00 PM	61.6	83.2	57.0	49.0	4:00 AM	49.9	70.2	39.6	39.0
5:00 PM	61.5	79.7	57.1	48.7	5:00 AM	55.5	72.0	44.1	40.0
6:00 PM	61.2	81.2	56.6	46.2	6:00 AM	58.9	77.8	49.1	42.7
7:00 PM	59.2	77.2	54.4	46.3	7:00 AM	63.3	85.1	57.1	48.2
8:00 PM	57.7	76.4	51.7	44.4	8:00 AM	63.2	83.7	58.5	49.3
9:00 PM	55.9	75.8	47.5	42.0	9:00 AM	61.7	75.8	56.2	46.2
10:00 PM	52.9	71.0	44.5	40.8	10:00 AM	58.6	71.8	53.3	43.6
11:00 PM	55.3	69.8	50.7	39.8	11:00 AM	59.8	74.7	54.3	44.7
12:00 AM	47.0	66.5	40.4	39.0	12:00 PM	61.0	74.9	56.6	48.1
1:00 AM	46.6	70.5	39.2	38.4	1:00 PM	61.5	85.2	56.2	47.7
2:00 AM	45.0	68.1	39.3	38.0	2:00 PM	59.7	77.6	54.8	45.9

Source: Appendix H.

Two short-term (15-minute) measurement locations were selected and conducted around the project site. All measurements were conducted Tuesday, August 19, 2025, in the afternoon at the end of the school day, as parents were picking up students.

- **Short-Term Location 1 (ST-1)** was in the front walkway of the residence at 1486 Valencia Avenue. The measurement was 1,282 feet northwest of the Legacy Magnet Academy. A 15-minute noise measurement

began at 3:10 pm on Tuesday, August 19, 2025. The noise environment is characterized by student pick-up traffic noise on Valencia Avenue. Noise levels measured 63.3 dBA L_{eq} and 74.2 dBA L_{max} during the measurement period at ST-1.

- **Short-Term Location 2 (ST-2)** was on Legacy Road across the street from the project site, north of the Legacy Magnet Academy driveway. A 15-minute noise measurement began at 3:38 pm on Tuesday, August 19, 2025. The noise environment is characterized primarily by student pick-up traffic noise on Legacy Road and traffic on Valencia Avenue. Noise levels measured 56.8 dBA L_{eq} and 71.6 dBA L_{max} during the measurement period at ST-2.

- **Long-Term Location 1 (LT-1)** monitoring was conducted in front (or south) of the residence at 1510 Valencia Avenue. The measurement location was within the courtyard of the residence at 1510 Valencia Avenue. A 24-hour noise measurement was conducted from August 19, 2025, to August 20, 2025. The noise environment is characterized primarily by traffic noise on Valencia Avenue and various residential noises, including students talking, alternate forms of transportation, birds, and wind. Valencia Avenue noise levels measured 62.3 dBA CNEL at 75 feet from the centerline.

City of Tustin Standards

The City of Tustin's noise standards are in its Municipal Code Chapter 6, Noise Control. Table 13, *City of Tustin Exterior Noise Limits*, summarizes exterior noise standards by zone and time of day. In addition to exterior noise standards, applicable exceptions, exemptions, and prohibited noise sources and activities are also provided.

Table 13 City of Tustin Exterior Noise Limits

Zone	Time Period	Allowable Noise Level, dBA
Residential	7:00 AM to 10:00 PM	55
	10:00 PM to 7:00 AM	50
Commercial	Anytime	60
Industrial	Anytime	70
All special properties such as hospitals, convalescent homes, public and institutional schools, libraries and churches.	7:00 AM to 10:00 PM	55
	10:00 PM to 7:00 AM	50
All Mixed-Use Properties	Anytime	60

Source: City of Tustin Municipal Code, Chapter 6, Noise Control.
Notes:
Exterior noise standards may not be exceeded for a cumulative period of more than 30 minutes in any hour (L_{50})
Exterior noise standards may not be exceeded by 5 dBA for a cumulative period of more than 15 minutes in any hour (L_{25})
Exterior noise standards may not be exceeded by 10 dBA for a cumulative period of more than 5 minutes in any hour (L_8)
Exterior noise standards may not be exceeded by 15 dBA for a cumulative period of more than 1 minutes in any hour (L_2)
Exterior noise standards may not be exceeded by 20 dBA for less than 1 minute (L_{max}).
In the event the ambient noise level exceeds either of the first four noise limit categories above, the cumulative period applicable to said category shall be increased to reflect said ambient noise level.

Figure 7 - Approximate Noise Monitoring Locations



Source: Nearmap 2025.

3. Environmental Analysis

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Prohibited

Construction of any building or site is prohibited between the hours of 6:00 pm and 7:00 am, Monday through Friday, and between 5:00 pm and 9:00 am on Saturdays. Construction is prohibited Sundays and City-observed federal holidays. Construction vehicles, trucks, and equipment involved with material deliveries, loading, transfer of materials, equipment service, and maintenance of any devices shall not be operated or adjacent to the project site outside of the allowable construction hours.

Ongoing maintenance for the joint-use park would be subject to the City's property maintenance equipment hours of operation of 7:00 am to 10:00 pm, Monday through Friday, and 9:00 am to 10:00 pm on Saturdays. Unusually loud maintenance activity is prohibited on Sundays and City-observed federal holidays.

Exemptions

The following are exempt from the Tustin Municipal Code noise standards under Chapter 6-4617, Exemptions:

- Noise from activities conducted on public or private schools that include nursery, elementary, intermediate, secondary, and college.
- Noise from activities conducted on any park or playground, provided such park or playground is owned and operated by a public entity.
- Construction noise is exempt between the hours of 7:00 am and 6:00 pm Monday through Friday and from 9:00 am to 5:00 pm Saturdays.

Would the project result in:

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

Less Than Significant Impact. Two types of short-term noise could occur: (1) mobile-source noise from transport of workers, material deliveries, and debris and soil haul, and (2) stationary-source noise from construction equipment. Based on District-provided information, construction is anticipated to start in September 2026 and end in January 2028. Equipment may include, but is not limited to, items such as graders, excavators, tractors, loaders, backhoes, forklifts, air compressors, dozers, and trucks.

Construction Vehicles

The transport of workers and materials to and from the construction site would incrementally increase noise levels along roadways in the campus area. Individual construction vehicle pass-bys may create momentary noise levels of up to approximately 85 dBA Lmax at 50 feet from worker and vendor vehicles and haul trucks. Most of the haul trips would occur during asphalt demolition debris hauling. However, these occurrences would generally be infrequent and short lived.

3. Environmental Analysis

Construction vehicles would access the project site via Valencia Avenue and Kensington Park Drive. Existing average daily traffic (ADT) along these access roads range between 7,430 to 10,706 ADT (DJ&A 2025). Based on CalEEMod construction modeling, the estimated worker and vendor trips would be 19 daily trips during construction phases. The additional temporary construction trips would result in a temporary, incremental traffic noise level increase of less than 1 dBA CNEL along both roadways. The existing traffic noise levels along Valencia Avenue and Kensington Park Drive range from 66 dBA to 70 dBA CNEL, and therefore the worker and vendor trips would not result in a significant temporary increase that would exceed the 1.5 dBA threshold. Therefore, noise impacts from worker and vendor trips would be less than significant.

Construction Equipment

Noise generated by on-site construction equipment is based on the type of equipment used, its location relative to sensitive receptors, and the timing and duration of noise-generating activities. Each stage of construction involves different kinds of equipment and has distinct noise characteristics. Noise levels from construction activities are typically dominated by the loudest equipment. The dominant equipment noise source is typically the engine, although work-piece noise (such as dropping of materials) can also be noticeable.

The noise produced at each construction stage is determined by combining the Leq contributions from each piece of equipment used at a given time, while accounting for the ongoing time-variations of noise emissions. Heavy equipment, such as a dozer or a loader, can have maximum, short-duration noise levels of up to 85 dBA at 50 feet. However, overall noise emissions vary considerably, depending on the specific activity performed at any given moment. Noise attenuation due to distance, the number and type of equipment, and the load and power requirements to accomplish tasks at each construction phase would result in different noise levels from construction activities at a given receptor. Since noise from construction equipment is intermittent and diminishes at a rate of at least 6 dBA per doubling of distance (conservatively disregarding other attenuation effects from ground absorption and shielding effects), the average noise levels at noise-sensitive receptors could vary considerably, because mobile construction equipment would move around the site with different loads and power requirements.

Average noise levels from project-related construction activities are calculated by modeling the three loudest pieces of equipment per activity phase. Equipment for each construction phase with the exception of building construction and architectural coating is modeled at spatially averaged distances (i.e., from the acoustical center of the general construction site to the property line of the nearest receptors) because the area around the center of construction activities best represents the potential average construction-related noise levels at the various sensitive receptors for mobile equipment. Equipment for building construction and architectural coating is modeled from the edge of the proposed building to the nearest sensitive receptors.

Using information provided by the District, the proposed project's expected construction equipment mix was categorized by construction activity using the FHWA RCNM. The associated, aggregate sound levels, grouped by construction activity, are summarized in Table 14, *Project-Related Construction Noise Levels*. Since the RCNM calculations do not account for shielding due to existing property line walls, intervening buildings and structures, ground effects, or air absorption, the results of these calculations are conservative (that is, they represent a "worst-case" scenario). As shown in Table 14, construction-related noise levels are estimated to

reach up to 70 dBA and would not exceed the 80 dBA Leq threshold at the nearest sensitive receptors. Therefore, project construction noise impacts would be less than significant.

Table 14 Project-Related Construction Noise Levels

Construction Activity Phase	Noise Levels in dBA L_{eq}		
	RCNM Reference Noise Level	Multi-family Receptor to East	School Receptor to South
Distance in feet	**50**	**350**	**275**
Demolition	85	68	70
Site Prep	81	64	66
Grading	83	66	68
Distance in feet	**50**	**175**	**285**
Building Construction	79	68	64
Architectural Coating	74	63	59
Distance in feet	**50**	**200**	**120**
Paving	79	67	66
Maximum dBA L_{eq}		**68**	**70**
Exceeds FTA's 80 dBA L_{eq} Threshold?		**No**	**No**

Source: FHWA's RCNM software.
Notes: Distances were measured from the acoustical center of the project site using Google Earth (2020).
dBA L_{eq} = Energy-Average (Leq) Sound Levels.

Operational Noise

The project would build a new education center and an outdoor event space with parking infrastructure and landscaping on the northeast side of the project site The proposed project's primary onsite operational noise sources would be rooftop heating, ventilation, and air conditioning (HVAC) units for the new building, parking lot activities, and outdoor space events.

The proposed project would include an outdoor event center for District-held events and trainings and community events. The outdoor event center would be in the eastern part of the project site, near the corner of Valencia Avenue and Legacy Road, approximately 240 feet from the nearest residential receptor to the east and future receptor to the south. The proposed project would use temporary speakers during District-held events and trainings and community events and would be considered long-term operational noise. In order for the temporary speakers to function effectively and be clearly audible, the sound pressure emanating from the speaker would typically be 10 to 15 dB higher than existing ambient noise levels. As discussed above, the ambient noise level in the project area is dominated by vehicular roadway traffic along Valencia Avenue (62.3 dB CNEL at 75 feet) with hourly noise levels ranging from 58.6 dBA Leq to 63.3 dBA Leq. Temporary speaker noise would most likely generate noise levels between 65 and 75 dBA. Accounting for attenuation due to distance, outdoor event center temporary speaker noise would range from 55 dBA Leq to 65 dBA Leq at the nearest multifamily residential receptor building facade approximately 240 feet to the east. Typical exterior-to-interior noise attenuation with windows and doors closed is 25 dBA. This would result in interior noise levels of approximately 30 to 40 dBA Leq at the nearest multifamily residential use to the east. Therefore, outdoor event center temporary speaker noise levels are not expected to exceed 45 dBA Leq within adjacent receptor

interior uses based on typical exterior-to-interior noise attenuation. Furthermore, operational noise from outdoor event center temporary speaker noise would not substantially increase ambient noise levels at nearby receptors and comply with Tustin Municipal Code Chapter 6, Noise Control. Thus, noise impacts from mechanical equipment would be less than significant.

The proposed project would include rooftop HVAC units for climate control. HVAC units would generate noise levels of up to 74 dBA (York 2006). Assuming project HVAC units would be operating continuously would result in a HVAC noise level of 52 dBA Leq at the nearest noise sensitive receptor (residence to the east at 300 feet from center of project rooftop). The proposed building would include rooftop parapets that would break line of sight from source to receiver and reduce HVAC noise levels at nearby receptors below 50 dBA Leq. Project HVAC noise would not exceed daytime or nighttime noise standards of 55 dBA and 50 dBA Leq, respectively (per Chapter 6, Noise Control, of the Tustin Municipal Code). Furthermore, operational noise from HVAC would not substantially increase ambient noise levels at nearby residences. Thus, impacts would be less than significant.

The project parking lot would consist of 148 parking stalls for visitors and staff. The receptors south of the proposed parking lot along Legacy Road would experience noise due to vehicles idling and maneuvering at the parking lots, doors opening and closing, and voices in the parking lot areas, similar to existing conditions of the receptors to the south. These activities would occur for short periods of time in the morning and afternoon. Based on measurements conducted from a previous project by PlaceWorks, parking lot activities for a similar project and accounting for distances from the center of proposed parking lot to the nearest sensitive receptor (380 feet to the east), parking lot noise would be 43 dBA Leq. Project parking noise would not exceed daytime or nighttime noise standards of 55 dBA and 50 dBA Leq, respectively (per Chapter 6, Noise Control, of the Tustin Municipal Code). Furthermore, operational noise from parking lot activities would not substantially increase ambient noise levels at nearby residences. Thus, impacts would be less than significant.

Operational Off-Site Traffic Noise

A project will normally have a significant effect on the environment related to traffic noise if it substantially increases the ambient noise levels for adjoining areas. Most people can detect changes in sound levels of approximately 3 dBA under normal, quiet conditions, and changes of 1 dBA to 3 dBA under quiet, controlled conditions. Changes of less than 1 dBA are usually indiscernible. A change of 5 dBA is readily discernible to most people in an outdoor environment. Noise levels above 65 dBA CNEL are normally unacceptable at sensitive receptor locations such as residences, and noise environments in these areas would be considered degraded. Based on this, a significant impact would occur if the following traffic noise increases occur relative to the existing noise environment:

- 1.5 dBA in ambient noise environments of 65 dBA CNEL and higher
- 3 dBA in ambient noise environments of 60 to 64 dBA CNEL
- 5 dBA in ambient noise environments of less than 60 dBA CNEL

Based on existing traffic noise modeling, a significant traffic noise impact occurs when the thresholds above are exceeded under cumulative conditions (with project), and the contribution of the project to future traffic is calculated to be greater than 1.5 dBA CNEL for Valencia Avenue and Kensington Park Drive.

Traffic volume data for the new trips associated with the project are provided by DJ&A (2025). The proposed project is expected to increase existing daily trips by 646 new daily project associated trips, with AM peak trips of 106 and 92 PM peak trips. The data provided by the traffic engineer presents the street and locations with scenarios for existing, existing with project conditions, 2028 no project, and 2028 with project conditions. With project trip additions, noise levels along the segments of Valencia Avenue and Kensington Park Drive would increase by less than 1 dBA. Table 15, *Project-Related Increases in Traffic Noise*, *dBA CNEL at 50 Feet,* shows that the project trip addition of proposed project trips would not result in a 1.5 dBA increase over existing conditions. Therefore, traffic noise impacts would be less than significant.

Table 15 Project-Related Increases in Traffic Noise, dBA CNEL at 50 Feet

	Segment		Traffic Noise Increase Existing CNEL at 50 Feet					
Roadway	From	To	Existing No Project	Existing with Project	Existing Increase	Baseline (2028) No Project	Baseline with Project (2028)	Future (2028) Increase
Valencia Avenue	Legacy Road	Columbus Square	69	69	<1	69	69	<1
Valencia Avenue	Legacy Road	Tustin Ranch Road	70	70	<1	70	70	<1
Kensington Park Drive	Valencia Avenue	Georgia Street	66	66	<1	67	67	<1

Source: Garland Associates (2024); Appendix K.
See Appendix H for calculations.

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

Less Than Significant Impact. Potential vibration impacts associated with development projects are usually related to the use of heavy construction equipment during the demolition, site preparation, and grading phases of construction. Construction can generate varying degrees of ground vibration depending on the construction procedures and equipment. Construction equipment generates vibration that spreads through the ground and diminishes with distance from the source. The effect on buildings in the vicinity of the construction site varies depending on soil type, ground strata, and receptor-building construction. The effects from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Vibration from construction activities rarely reaches levels that can damage structures.

For reference, a vibration level of 0.2 in/sec PPV is used as the limit for nonengineered timber and masonry buildings, which would conservatively apply to the surrounding structures (FTA 2018). Typical construction equipment can generate vibration levels ranging from 0.21 in/sec PPV at 25 feet. Table 16, *Vibration Impact Levels for Typical Construction Equipment*, summarizes vibration levels for typical construction equipment at a reference distance of 25 feet and adjacent receptors. The nearest off-site receptor is a future school use across

Legacy Road, approximately 90 feet south of the nearest construction impact area. At this distance, construction vibration from a vibratory roller would attenuate to 0.031 in/sec PPV or less. Proposed construction activities would not exceed the FTA vibration standard of 0.2 in/sec PPV at nearby structures. In addition, the proposed project operation would not include any substantial long-term vibration sources. Therefore, no significant vibration effects would occur, and impacts would be less than significant.

Table 16 Vibration Impact Levels for Typical Construction Equipment

	in/sec PPV		
Equipment	Reference Levels at 25 Feet	Receptor to East: Multifamily at 150 feet[1]	Receptor to South: School Campus at 90 feet[1]
Vibratory Roller	0.21	0.014	0.031
Clam shovel	0.202	0.014	0.030
Hoe Ram	0.089	0.006	0.013
Large Bulldozer	0.089	0.006	0.013
Caisson Drilling	0.089	0.006	0.013
Loaded Trucks	0.076	0.005	0.011
Jackhammer	0.035	0.002	0.005
Small Bulldozer	0.003	0.000	0.000

Source: FTA 2018.
Notes: See Appendix H for calculations
[1] As measured from the edge of construction site using Google Earth Pro.

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

No Impact. The project site is approximately 3.7 miles southwest of John Wayne Airport. The project site is not located within the 60 dBA CNEL airport noise contour. Therefore, the proposed project would not expose people residing or working in the project area to excessive noise levels, and no impact would occur.

3.14 POPULATION AND HOUSING

Would the project:

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

No Impact. The proposed project does not include the development of new homes or businesses that could potentially induce population in the area and would not extend off-site infrastructure to indirectly cause population growth. No new roads or housing would be constructed as part of the project and construction of the proposed project would be limited to the project site. The proposed project would not include any classroom or student uses on the project site. The education center would include relocating approximately 110 employees from other existing District offices within the City and would not generate any new employees.

Therefore, the proposed project would not induce population growth, either directly or indirectly. No impacts related to population growth would occur.

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

No Impact. As shown in Figure 3, the project site is vacant and no housing exists on-site. As such, the proposed project would not displace any people or housing. No impact would occur, and no mitigation measures are necessary.

3.15 PUBLIC SERVICES

Public service letters and informational questionnaires were sent to the Orange County Fire Authority (OCFA) and the Tustin Police Department (TPD) on September 4, 2025, requesting comments regarding fire and police-related services and an assessment of the potential impacts of the proposed project. A response from the OCFA was received on October 2, 2025 (see Appendix I). Additionally, the TPD responded to the letter on September 30, 2025 (see Appendix J). The results of the OCFA's response are detailed below in Impact 3.15(a), and the TPD's response are detailed below in Impact 3.15(b).

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

a) Fire protection?

Less Than Significant Impact. Fire protection and emergency services in the City of Tustin including the project site are provided by Orange County Fire Authority (OCFA). OCFA provides fire protection, emergency services, urban search and recure, emergency planning and coordination, a hazardous materials resource team, air operations, inspections wildland operations, public information and education fire prevention (OCFA 2025). The closest OCFA fire station to the project site is Fire Station #37 at 15011 Kensington Park Drive approximately 0.28 miles northeast of the project site. According to the OCFA, Stations #6, #21, and #79 can also provide fire protection and emergency services to the project site. Each of the stations include 4 personnel and Type 1 fire engine. Station #6 provides Heavy Rescue services and Station #79 includes a hazardous materials (HAZMAT) unit. The OCFA also supports and receives support from other local and regional fire agencies for all emergencies. The OCFA contracts with the City of Tustin for fire services and all development and impact fees are determined by the OCFA's Community Risk Reduction Department on a case-by-case basis. The OCFA's response time policy is 60 to 90 seconds for emergency calls (Cowdell 2025).

The OCFA has no plans at this time to expand personnel or equipment to the project site because the project site is close to Station #37 and that Station #37 has been strategically placed to be able to handle additional call volume that may occur as a result of the proposed project. Additionally, the OCFA stated that no deficiencies exist in terms of personnel or equipment but that infrastructure may not be operational yet at the project site which includes fire hydrants and fire protection systems (Cowdell 2025).

3. Environmental Analysis

Construction

During the construction phase of the proposed project, construction workers would temporarily be on-site. Construction of the proposed project would be required to comply with the California Fire Code and standard best practices to ensure on-site fire safety during construction. The California Fire Code includes standards for building and construction, requirements for emergency access, hazardous material handling, and fire protection systems. Construction of the proposed project would further be require to adhere to Occupational Safety and Health Administration (OSHA) regulations to ensure the construction activities and conditions are safe and would not interfere with access and travel of emergency vehicles.

According to OCFA's response, Fire Station #37, located at 15011 Kensington Park in Tustin, includes 4 personnel and a Type 1 fire engine. As indicated in OCFA's response, at this time OCFA does not plan to expand personnel or equipment to Fire Station #37 and that Fire Station #37 is able to handle any additional call volume as a result of the proposed project (see Appendix I). Additionally, Fire Stations #6, #21, and #79 would also provide support, if needed, and no existing deficiencies in the fire protection service exist on the project site (Cowdell 2025). Therefore, project construction would not affect fire and emergency response protection services to the extent that new or physically altered fire facilities would be needed to maintain acceptable service ratios, response times, or other performance objectives for fire protection services, construction-related impacts on fire protection would be less than significant.

Operation

The proposed project includes the construction of a new education center and an outdoor event space with parking infrastructure and landscaping. The proposed project would relocate approximately 110 employees from two other District offices within the City. The proposed project would not generate new employees and would not result in the construction of new housing. However, the proposed project would develop an outdoor events center allowing for District-related events and community uses in accordance with the Civic Center Act, which may increase the demand for fire services. No events would occur on weekends or after work hours. The proposed project would add new events and activities and event participants. As stated above, OCFA has adequate capacity to serve the proposed project and does not plan to expand personnel or equipment to Fire Station #37. Fire Station #37 has adequate capacity handle additional call volume as a result of the proposed project. Additionally, the Fire Stations #6, #21, and #79 would also provide support, if needed (Cowdell 2025). The proposed project would not result in a substantial increase in demand for fire services.

The proposed access and circulation features at project site, including the parking lot, and fire lanes, would be reviewed by DSA to ensure the project site can accommodate emergency ingress and egress by fire trucks, police units, and ambulance/paramedic vehicles. The proposed project would be designed to accommodate emergency access to the facility in accordance with the fire code. DSA review would ensure that plans, specifications, and construction comply with access, fire, and life safety design standards established by DSA and California's building codes (Title 24 of the California Code of Regulations). DSA would review fire department and emergency access roadways to ensure adequate emergency access is maintained. Therefore, the proposed project would not affect emergency access to the project site. Although the proposed project may result in a minor increase in demand for fire protection services compared to existing conditions, it would not

require new or substantially expanded fire protection facilities or personnel. Therefore, impacts would be less than significant.

b) Police protection?

Less Than Significant Impact. The TPD provides police protection services from its main station at 300 Centennial Way, approximately 2.2 miles north of the project site, as well as from the TPD Annex at 15445 Lansdowne Road. TPD has 105 sworn staff (including 1 chief, 3 captains, 6 lieutenants, 19 sergeants, and 76 officers), four sworn part-time reserve officers, 54 civilian staff (including 2 managers, five supervisors, 12 dispatchers, 15 police service officers, 12 record specialists, 3 property and evidence technicians, 1 crime analyst, 1 emergency operations coordinator, 1 behavioral health resources unit manager, 1 management analyst, and 1 fleet coordinator), and 26 part-time civilian staff (including 5 dispatchers, 1 records specialist, 5 police service officers, 4 detention officers, 1 property and evidence technician, 1 fleet coordinator, 4 parking control officers, and 5 cadets). TPD does not have a specific goal or standard for response times. However, they use a four-level priority system to ensure appropriate response to calls for service.

- **Priority 1:** Immediate threat to life or significant threat to public safety. These calls are dispatched immediately.
- **Priority 2:** Crimes in progress or other calls for service with a potential threat to public safety that do not rise to the level of a Priority 1 call. These calls are dispatched as soon as possible.
- **Priority 3:** Calls for service with a reporting party who is waiting for an officer.
- **Priority 4:** Report calls with a delay in reporting and limited suspect information (Roque 2025).

According to TPD, average response times in the reporting district that would cover the proposed project is between 4 minutes and 12 seconds for Priority 1 calls to 38 minutes and 19 seconds for Priority 3 calls. Priority 4 calls within a response time of 2 hours, 1 minute, and 36 seconds within the reporting district. These response times are below the citywide average. Estimated response time to the project site would be about 9 minutes from the main station and 4 minutes from the Annex. TPD patrol officers respond to calls for service from the field. Officers are at the station when turning in reports, using the restroom, or booking suspects who have been arrested. Officers are encouraged to remain in the field in between calls for service to conduct proactive police work. At times, they are responding to calls for service from the opposite side of the city. The number of officers/cars/motorcycles on duty is dependent on the day of week/time of day (Roque 2025).

TPD notes that the agency is short staffed by approximately 91 officers and 46 civilian employees; however, the agency does not allow staffing needs to negatively impact the police services with possible limitations based on unpredictable nature of needs. As part of TPD's Strategic Plan for 2025-2027, TPD is in the early stages of leading the construction of a new police facility, including funding and design for future training and department growth (Roque 2025). The projected completion of this project is in 2027, with a potential site near the Tustin Legacy area. This TPD project is independent of the proposed project and would be needed and proceed regardless of the proposed project. See Appendix J.

3. Environmental Analysis

Construction

During the construction of the proposed project, construction workers would temporarily be on-site. Construction of the proposed project would maintain emergency access and emergency egress routes during project construction. Active construction areas would be fenced during the construction phase, and construction site access would be limited to authorized personnel. Further, the storage and staging of construction equipment would occur on the project site; the project site during construction would be fenced; and equipment and vehicles would be locked, hidden from view, and only accessible by authorized personnel.

TPD states that it would have adequate resources to meet the possible demands of the proposed project and does not anticipate that the proposed project would have an impact on TPD's ability to provide police protection service to the projected area. Additionally, construction of the proposed project would include several design features and security measures that would reduce the opportunity for criminal activity to occur onsite, which meets the goals and intent of TPD's design guidelines to reduce crime through design. For example, during construction, equipment and tools would be locked and hidden from view and fencing would be maintained around the perimeter of the project site. The construction managers will be responsible for maintaining the safety and security of the project site and will maintain a list of contractors and key personnel with key access. Standard security measures during construction would further deter criminal activity onsite and reduce potential police response needs (Roque 2025). Since TPD has determined that it has adequate resources to service the proposed project and the proposed project would not impact TPD's ability to provide police services, the proposed project would not require new or substantially expanded fire protection facilities or personnel. The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities that would necessitate the need for new or physically altered police protection facilities. Construction-related impacts on police protection would be less than significant.

Operation

Operation of the proposed project would not construct any housing nor generate new employees because they would be relocated from two other District offices within the City. However, the proposed project would develop a new educational center on a currently vacant site, which would also have an outdoor events space allowing for District-related events and community uses in accordance with the Civic Center Act (See Section 3, *Project Description*). The development of a new educational center along with use of the outdoor events space may increase the demand for police services compared to existing conditions. The proposed project would operate during standard business hours. No events would occur on weekends and after work hours. As discussed in Section 3.15(a), adequate emergency access to the project site would be provided, which would reviewed by DSA.

Operation of the proposed project would include several design features and security measures that would reduce the opportunity for criminal activity to occur onsite, which meets the goals and intent of TPD's design guidelines to reduce crime through design. The proposed project would include security fencing along the north side of the education center and around the secured parking lot (see Figure 5). The proposed project would maintain landscaping onsite to ensure adequate visibility and would include lighting throughout the project site,

including outdoor security lights, parking lights, and accent lighting, which would provide visibility and security during nighttime hours. The proposed project would further have security cameras at key locations around the project site, including at building entrances. The proposed project site would also post adequate signage, building numbers, and wayfinding. The proposed project would not include a warehouse and the parts of the education center not located behind the security fencing would not include delivery doors (see Figure 6).

TPD indicated that events of a certain size held at project site may require additional officers to staff events. Should these types of events arise, and consistent with Tustin Municipal Code Section 1730, the District would be required to pay an event planning fee to pay for the cost to staff officers at events (Roque 2025). As such, compliance with existing regulations would ensure that potential impacts to police services during events would be less than significant.

TPD states that it would have adequate resources to meet the possible demands of the proposed project and does not anticipate that the proposed project would have an impact on TPD's ability to provide police protection service to the projected area (Roque 2025). Therefore, proposed project would not require new or substantially expanded police protection facilities or personnel. The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities that would necessitate the need for new or physically altered police protection facilities. The proposed project would have a less than significant impact to police protection services during operation of the proposed project.

c) Schools?

No Impact. The proposed project includes development of a new district education center and outdoor event space with parking infrastructure and landscaping, that would house the relocated District employees from other District offices within the City. The proposed project would not construct any housing, generate new employees, nor result in direct population growth that could impact school facilities. Therefore, no impacts to schools would occur.

d) Parks?

No Impact. The City of Tustin owns and operates 28 recreational facilities such as parks, parkettes, promenades, and community centers (Tustin 2025e). Additionally, Orange County's regional park system contains 39,000 acres in urban and wilderness parks (Orange County 2025). The Montgomery Square Park approximately 0.18 miles north of the project site is the closest community park.

Typically, an increase in demand for parks is created by the development of new housing and/or population generating actions (such as large employment centers). The proposed project is a District office facility and would not build housing or provide additional employment opportunities because they would be relocated from two other District offices within the City. Therefore, the proposed project would not generate new population growth or housing that would increase the demand on parks. The proposed project would not increase the use of existing parks or recreational facilities, or the need for new parks or recreational facilities. Additionally, the outdoor events center can also be used by the community in accordance with the Civic Center Act. The proposed project would have no impact on parks.

e) Other public facilities?

No Impact. Orange County Public Libraries provides library services, a digital library, e-resource (online resources), workshops, public events, and other resources. The Tustin library branch is located at 345 E. Main Street and is approximately 2.1 miles north of the project site. The proposed project would construct a District office and would not build housing or provide additional employment opportunities as they would be relocated from two other District offices within the City. Therefore, the proposed project would not generate any additional demand for library facilities. The proposed project would not require new or physically altered libraries facilities, and no impact to libraries would occur.

3.16 RECREATION

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated?

No Impact. The City of Tustin owns and operates 28 recreational facilities such as parks, parkettes, promenades, and community centers (Tustin 2025e). Additionally, Orange County's regional park system contains 39,000 acres in urban and wilderness parks (County of Orange 2025). The Tustin Montgomery Square Park, approximately 0.18 mile north of the project site, is the closest community park, and the William R Mason Regional Park, approximately 3.9 miles south of the project site, is the closest regional park. Typically, an increase in demand for parks is created by the development of new housing and/or population generating projects.

The proposed project would build a new education center and an outdoor event space with parking infrastructure and landscaping. The proposed project would not include additional recreational facilities. The proposed project would relocate approximately 110 employees from two other District offices within the City of Tustin. The proposed project would not generate new employees and would not result in the construction of any new housing. The proposed project would not result in a substantial increase in use of existing parks or recreational facilities or the need for new parks or recreational facilities. Therefore, the proposed project would not increase use of existing neighborhood and regional parks or other recreational facilities. Therefore, no impact would occur.

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

No Impact. The proposed project would not include recreational facilities. The proposed project would not generate new employees and would not increase the area's population by building new housing. The proposed project would not include the development of recreational facilities nor require the expansion of existing recreational facilities since it does not affect population growth or student enrollment. Therefore, no impact would occur.

3.17 TRANSPORTATION

Would the project:

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

Less Than Significant Impact.

Construction

Construction of the project would include large construction equipment, transportation of equipment to and from the project site, and worker vehicles. However, construction traffic would be temporary, and all construction activity and staging areas would be on the project site. Therefore, the proposed project would not obstruct traffic lanes or have any long-term effects on the circulation system.

Operation

The proposed project includes the construction of an education center and an outdoor event space with parking infrastructure and landscaping. The proposed project would relocate approximately 110 employees from two other District offices within the City. The proposed project would not generate new employees.

The proposed project would include the construction of office space for District personnel. Office hours for District personnel would take place during regular work hours and generate trips during the AM and PM peak hours of weekdays. Additional trips generated outdoor event center were not included because the outdoor event center would typically be utilized by District staff already on-site during weekday daytime hours and the community outside of peak AM and PM hours and on weekends. The trip generation for the proposed project was estimated using rates published in the ITE *Trip Generation Manual* (12th edition) (see Appendix K). The number of trips resulting from the proposed project were estimated using the *Trip Generation Manual* values for land use code 528, School District Office. Table 17, *Estimated Project Average Daily Trips Impacts,* illustrates the existing ADT in 2025, ADT with the project in 2025, ADT in 2028 if no project was to occur, and with the project constructed in 2028.[6] The project is expected to generate 646 trips on weekdays. The project is expected to generate 106 trips during the AM peak hour, with 76 percent (81 vehicles) entering the site and 24 percent (25 vehicles) exiting the site. During the PM peak hour, the project is expected to generate 92 trips, with 17 percent (16 vehicles) entering the site and 83 percent (76 vehicles) exiting the site. Therefore, no significant weekday AM or PM peak hour impacts to traffic are anticipated.

[6] 2028 was utilized as part of the analysis as it is the expected year of construction completion.

Table 17 Estimated Project Average Daily Trip Impacts

Roadway	Existing ADT	2028 (No Project)	2025 (With Project)	2028 (With Project)
Valencia Ave, between Legacy Rd and Columbus Sq	10,706	11,030	11,352	11,676
Valencia Ave, between Legacy Rd and Tustin Ranch Rd	12,057	12,422	12,703	13,068
Kensington Park Dr, between Valencia and Georgia St	7,430	7,655	8,076	8,301

Sources: DJ&A 2025. See Appendix K.

The City of Tustin Circulation Element includes various programmatic policies that provide a guide for safe and efficient movement of people and goods from within the City to areas outside its boundaries, including increasing the use of non-motorized travel. As discussed above, the proposed project would increase vehicle trips compared to existing conditions. However, the proposed project would adhere to the Tustin General Plan and its policies, including Circulation Element Policy 1.10, which requires that proposals for major new developments include a future traffic impact analysis that identifies measures to mitigate any identified project impacts (see Appendix K). Additionally, the proposed project would not conflict with Policy 6.12, which promotes a non-vehicular circulation system for bicycles and pedestrians. The project proposes the installation of two new driveways connecting to the public rights-of-way. During operation, these driveways would cross existing sidewalks but would not impede their continued use. Furthermore, the project does not propose any modifications to the existing bicycle lanes. Therefore, the proposed project is consistent with the goals and policies of the Tustin General Plan and would not conflict with any program, plan, ordinance, or policy addressing the existing circulation system.

Intersection Impact Analysis (Non-CEQA)

While SB 743 has shifted the determination of CEQA impacts from levels of service (LOS) to VMT, LOS is still used by the City, as outlined in the City's Traffic Study Guidelines for VMT and LOS. Therefore, an LOS evaluation has been included for informational purposes. Consistent with City of Tustin's traffic study guidelines, the intersection capacity utilization (ICU) analysis methodology was applied to determine the traffic LOS at all of the study's signalized intersections. Traffic LOS are designated A through F, with LOS A representing free flow conditions and LOS F representing severe traffic congestion.

The intersections adjacent to the project site were selected for analysis, including Legacy Road and Valencia Avenue, Tustin Ranch Road and Valencia Avenue, and Kensington Park Drive and Edinger Avenue. Additionally, the analysis includes an analysis of LOS for the study area intersections under the following scenarios: Existing Conditions (2025) without Project, Opening Year (2028) without Project, Existing Conditions (2025) with Project, Opening Year (2028) with Project. A summary of the AM and PM peak hour intersection level of service analysis results for all scenarios are included in Table 18, *Project Intersections Level of Service Impacts*. All three intersections are forecast to operate at acceptable levels of service during all four scenarios, which includes the opening year with project conditions. All three study intersections currently operate at an acceptable level of service during both the AM and PM peak hours.

Table 18 Project Intersections Level of Service Impacts

Intersection	Existing ADT	Existing LOS	2028 (With Project)	2025 (With Project)	2028 (With Project)
Legacy Rd and Valencia Ave	AM peak hour	B	B	B	B
	PM peak hour	A	A	A	A
Tustin Ranch Rd and Valencia Ave	AM peak hour	B	B	B	B
	PM peak hour	B	B	B	B
Kensington Park Dr and Valencia Ave	AM peak hour	A	A	A	A
	PM peak hour	A	A	A	A

Sources: SJ&A 2025. See Appendix K.

The proposed project would be consistent with City of Tustin's traffic study guidelines, and Growth Management Element Policy 1.1, which states that development projects contribute to attaining a LOS at a level greater then D. Table 18 identities that none of the study area intersections would be significantly impacted by traffic that would be generated by the proposed project because the intersections would continue to operate at LOS similar to existing conditions.

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

Less Than Significant Impact. On September 27, 2013, SB 743 started a process that fundamentally changed transportation impact analyses as part of CEQA compliance. SB 743 eliminated auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as the sole basis for determining significant impacts under CEQA. As part of the current CEQA Guidelines, the criteria "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099(b)(1)). Pursuant to SB 743, the California Natural Resources Agency adopted revisions to the CEQA Guidelines on December 28, 2018, to implement SB 743. CEQA Guidelines Section 15064.3 describes how transportation impacts are to be analyzed after SB 743. Under the Guidelines, metrics related to "vehicle miles traveled" (VMT) were required beginning July 1, 2020, to evaluate the significance of transportation impacts under CEQA for development projects, land use plans, and transportation infrastructure projects. State courts ruled that under the Public Resources Code Section 21099, subdivision (b)(2), "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment" under CEQA, except for roadway capacity projects.

The VMT screening analysis for the proposed project was completed following the City of Tustin's VMT Guidelines for CEQA (adopted May 2024). These guidelines identify a set of screening criteria to apply to new projects to determine if the project can be screened out (identified to have a less-than-significant impact on VMT) or if the project's effect on VMT require more involved analysis to determine if the project would create a significant impact and would require measures to mitigate VMT impacts.

The project's performance under each of the screening criteria identified by the City of Tustin is detailed below:

- **100 Percent Affordable Housing.** The project is not a housing project and not eligible to be screened out under this category.

- **Located within ½ mile of qualifying transit.** The project is located outside of a ½-mile radius of the Tustin Metrolink station and is not eligible to be screened out under this category.

- **Locally Serving Land Use.** The City of Tustin identifies local serving civic uses as locally serving uses that are not required to conduct more detailed VMT analysis. These uses include libraries, civic centers, and community facilities. A school district office, including a small community center, would qualify under this criteria.

- **Located in a low VMT area.** The City has identified several transportation analysis zones (TAZ) where household per capita VMT or VMT per employee is lower than the citywide average. If a project is located in one of these VMT areas it can be screened out from further VMT analysis. The proposed project is not located in a low VMT area and is not eligible to be screened out under this category.

- **New project daily trips below 500 ADT.** Smaller projects are assumed to have a less-than-significant impact on VMT and can be screened out from further analysis. The new education center would involve relocating some of the District's existing administrative uses to the new site. Because the proposed project is a relocation of an existing use, with some expansion, the project is anticipated to result in a net increase of less than 500 new daily trips. As highlighted in Section 3.17(a), the project would be anticipated to generate 646 daily trips in its new location. A significant portion of these daily trips would involve the relocation of existing trips as the District plans to relocate approximately 83 employees from the existing District office at 300 South C Street in Tustin and approximately 27 employees from the district's existing educational support center at 1151 San Juan Street in Tustin. The ITE *Trip Generation Manual* estimates 5.08 daily trips per employee for the school district office land use type. Applying this rate to the approximately 110 employees being relocated results in a forecast of 559 daily trips that would be relocated trips rather than new vehicle trips. The relocation of these existing vehicle trips would reduce the estimated net new daily trips generated by the project to 87 vehicle trips, well below 500 trips per day, allowing the project to qualify under this criterion.

Based on review of the screening criteria above, the proposed project satisfies two of the criteria adopted by the City of Tustin. Specifically, the proposed project would satisfy the Locally Serving Land Use and the New project daily trips below 500 ADT criteria. Therefore, the project's impact on a VMT is anticipated to be less than significant.

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

Less Than Significant Impact. The project site is currently vacant with an existing driveway along Legacy Road for access. As discussed in Section 1.3.1, *Proposed Land Use*, the proposed project includes both public parking for visitors and staff and secured parking for staff. The proposed project would include a public parking lot south of the education center along Legacy Road with a pick-up and drop-off area accessed by two ingress-egress driveways along Legacy Road. The proposed project would include a secured parking lot reserved for

staff located north of the education center which would be accessed from one gated, ingress-egress driveway located along Valencia Avenue. Additionally, the proposed project would include internal pedestrian circulation walkways and a sidewalk along the northern portion of the site for public access.

The increased levels of traffic, the increased number of pedestrians, and the increased number of vehicular turning movements that would occur at the driveways and at the nearby intersections would result in an increased number of traffic conflicts and a corresponding increase in the probability of an accident occurring. These impacts would not be significant, however, because the roads, intersections, and driveways are designed to accommodate the anticipated levels of vehicular and pedestrian activity. All improvements in the public right-of-way (i.e., sidewalks and driveways) would be designed and constructed consistent with the City of Tustin's standards and all improvements within the project site would be consistent with the criteria of the DSA and would be reviewed by the OCFA. These roads and intersections have historically been accommodated to commercial-related traffic from the surrounding area.

As discussed in Impact 3.17(a), although the proposed project would result in additional average daily traffic, all three intersections studied are forecast to operate at acceptable levels of service with project conditions. Further the proposed project would construct internal walkways that would connect to the existing sidewalks and crosswalks on Valencia Avenue and Legacy Road. The Valencia Avenue and Legacy Road intersection has painted crosswalks and traffic signals with pedestrian crossing phases. The proposed project would not modify the existing pedestrian circulation system and continue to support pedestrian access and circulation. The increase in vehicles on the roadway would be compatible with the design and use of the existing roads and pedestrian circulation would continue to support pedestrians. Therefore, the proposed project would not substantially increase hazards due to geometric design features or incompatible uses. A less than significant impact would occur.

d) Result in inadequate emergency access?

Less Than Significant Impact. Access to the project site would be provided by two driveways off Legacy Road and one driveway along Valencia Road. The project site includes an existing driveway along Legacy Road but would include installing an additional driveway along Legacy Road and a driveway along Valencia Avenue to provide access to the proposed public and secured parking lots (see Figure 5). To ensure adequate emergency and fire access, project improvements would be designed in compliance with applicable DSA, City of Tustin, and OCFA standards (e.g., minimum lane width and turning radius). The DSA would review plans, specifications, and construction to confirm compliance with fire and life safety standards, including roadway requirements for emergency vehicles. Further, the City of Tustin would review and approve new driveway connections to the public rights-of-way. With these measures in place, emergency vehicles would have adequate access to all areas of the project site. Therefore, the project would not conflict with emergency access, and impacts would be less than significant.

3.18 TRIBAL CULTURAL RESOURCES

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

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

Less Than Significant Impact With Mitigation Incorporated. As discussed under Threshold 3.5(a), the two hangars within the former MCAS are listed within the National Register of Historic Places; However, the project site contains no notable features of the MCAS and has remained unused (NPS 2025; Appendix D). Additionally, the Tustin Historic Resources Map does not identify any historic resources or potential historic resources within the vicinity of the project site, with the closest site approximately 0.95 mile north. The proposed project would not impact local historical sources due to the distance. The field survey yielded negative results for potential "historical resources," and no buildings, structures, objects, features, or artifacts of prehistoric or historical origin were observed within or adjacent to the project site. Thus, the project site is not listed or eligible for listing in the California Register of Historical Resources, National Register of Historic Places, California State Historical Landmarks, Points of Historical Interest, or in a local register of historical resources (OHP 2025; NPS 2025).

As discussed under Threshold 3.5(b), of the 20 cultural resources that were previously recorded within the one-mile radius, 13 were prehistoric (i.e., Native American) in origin (Appendix D). Additionally, as part of the Historical/Archaeological Resources Survey Report the NAHC Sacred Lands File search was conducted and yielded a negative result, which indicates that no known sacred sites or tribal cultural resource (TCR) exist within the vicinity of the project site (Appendix D). Although no known TCR have been identified on the project site, the proposed project has the potential to disturb subsurface deposits possessing traditional or cultural significance to Native American or other descendant communities. With implementation of Mitigation Measures CUL-1 and TCR-1, impacts to tribal cultural resources would be less than significant (see threshold questions 3.5(b), above, and 3.18(a)(ii), below).

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant Impact With Mitigation Incorporated. Assembly Bill 52 (AB 52) requires meaningful consultation with California Native American tribes on potential impacts to tribal cultural resources, as defined in PRC Section 21074. Tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible or listed in the California Register of Historical Resources or local register of historical

resources. As part of the AB 52 process, Native American tribes must submit a written request to the District (lead agency) to be notified of projects within their traditionally and culturally affiliated area. The District must then provide written, formal notification to those tribes, and the tribe must respond to the lead agency within 30 days of receiving this notification if they want to engage in consultation on the project. When these steps are completed, the District must begin the consultation process within 30 days of receiving the tribe's request. Consultation concludes when either 1): the parties agree to mitigation measures to avoid a significant effect on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort, concludes mutual agreement cannot be reached.

The NAHC provided a list of nine California Native American tribes that are traditionally and culturally affiliated with the project site area and may have additional information. Pursuant to AB 52, the District mailed and emailed tribal consultation letters to the nine tribes on September 8, 2025 inviting the tribes to consult on the proposed project. Further, a Sacred Lands File request was submitted to the NAHC and received a negative result—there are no known sacred sites or TCRs within or in the vicinity of the project site (Appendix D).

On October 8, 2025, the District received a request for consultation from the Juaneno Band of Mission Indians Acjachemen Nation-Belardes regarding the proposed project. The Juaneno Band of Mission Indians Acjachemen Nation-Belardes provided mitigation measures to incorporated into the IS/MND that address the inadvertent discovery of tribal cultural resources and to minimize the potential impacts to tribal cultural resources. The mitigation measure is incorporated as Mitigation Measure TCR-1, below. Although unlikely, the potential to unearth TCRs during ground disturbing activities may occur. In the event TCRs are discovered, Mitigation Measure TCR-1 provides guidance on how to proceed in the event that TCRs are discovered. Therefore, implementation of Mitigation Measure TCR-1 would reduce impacts to less than significant.

Mitigation Measure

TCR-1 Retention of a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.

- The Tustin Unified School District ("District") shall retain a Native American Monitor from or approved by the Juaneno Band of Mission Indians, Acjachemen Nation- Belardes ("Tribe"). The monitor shall be retained prior to the commencement of any ground-disturbing activity for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" means demolition of structures in contact with soil (which shall not include demolition of structural elements not in contact with soil, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.
- A copy of the executed monitoring agreement shall be submitted to the District prior to the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence ground disturbing activity.

- The District will notify the monitor seven (7) days prior to the start of a ground-disturbing activity. Upon arrival at the construction site, the monitor shall check in with the construction superintendent. The monitor's time at the construction site during each ground-disturbing activity shall be compensated in accordance with the Tribal Monitoring Agreement to be subsequently entered into between the Tribal Monitoring Agency and the District. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered tribal cultural resources ("TCRs"), including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the District upon written request to the Tribe. Prior to leaving the construction site, the monitor will check out with the Construction Superintendent. The District will inform the monitor when a ground-disturbing activity will end.
- On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Tribe or Tribal monitoring agency from a designated point of contact for the District that all ground-disturbing activities and phases that may involve the Project are complete; or (2) a determination and written notification by the Tribe or Tribal monitoring agency to the District that no future, planned construction activity and/or development/construction phase at the Project site possesses the potential to impact TCRs.

3.19 UTILITIES AND SERVICE SYSTEMS

Would the project:

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

Less Than Significant Impact.

Water

The proposed project would construct a new education center and an outdoor event space with parking infrastructure and landscaping, which would increase the demand for water. Water is provided to the campus and project site by the Tustin's Water Services Division. The proposed project would connect to the existing underground water mains. The proposed project would operate in accordance with the California Building Code and CALGreen requirements, such as CALGreen Division 5.304, *Outdoor Water Use*. As further discussed under Section 3.19(b) below, the City's Water Services Division would provide water to the site, which is sourced from the local groundwater and supplemental imported potable water by MWDOC through IRWD and local

groundwater from the OC Basin; and the City has sufficient water capacity to serve the proposed project (Tustin 2021). The proposed project would not require the relocation or construction of new or expanded water facilities that could cause significant environmental impacts. Therefore, impacts would be less than significant.

Wastewater

The proposed project would construct a new education center and an outdoor event space with parking infrastructure and landscaping, which may increase the demand for wastewater services. OCWD owns and operates the wastewater collection system. Wastewater in the City is conveyed for treatment to the Orange County Sanitation District (OC SAN) for treatment and disposal (Tustin 2021).

OC SAN has a system of gravity flow sewers, pump stations, and pressurized sewers to convey wastewater to two treatment plants: Fountain Valley (Plant No. 1) and Huntington Beach (Plant No. 2). Plant No. 1 has a primary and secondary capacity of 208 and 182 million gallons per day (mgd), respectively; Plant No. 2 has a primary and secondary capacity of 168 and 150 MGD, respectively (OC SAN 2022). The OC SAN has a total 2023-24 average daily flow of 192 MGD of wastewater (OC SAN 2025). As further discussed in Section 3.19(c), the proposed project would not substantially increase wastewater. Wastewater generated by the proposed project will be conveyed to the existing sewer lines in the public right-of-way. Therefore, the proposed project would not require the construction of new or expanded wastewater facilities that could cause significant environmental effects. Impacts would be less than significant.

Stormwater Drainage

As substantiated in Impact 3.10(c.iii), impacts would be less than significant, and no mitigation measures are necessary.

Electric Power

Electricity is provided by Southern California Edison. The proposed project would require utility trenching and connect to existing electric power infrastructure for operation. The proposed project would result in an increase in electricity consumption that would be adequately served by the existing infrastructure. Additionally, the proposed project would include a solar canopy in a parking lot. Installation of solar panels would offset the proposed Project's demand for electricity. The proposed project would be required to comply with energy efficiency standards set forth by the CBC and CALGreen requirements. Therefore, implementation of the proposed project would not result in the relocation or construction of new or expanded electricity facilities that could cause significant environmental impacts. Therefore, impacts would be less than significant.

Natural Gas

Natural gas service is provided by the Southern California Gas Company. The proposed project would utilize natural gas during operation. As discussed in impact 3.6(a), the proposed project would be built to meet the Building Energy Efficiency Standards, which would ensure energy efficiency as it pertains to natural gas use would not result in wasteful, inefficient, or unnecessary natural gas demands. Therefore, impacts would be less than significant.

3. Environmental Analysis

Telecommunications

There are a variety of telecommunication services available to the project site. The proposed project would require utility trenching and connect to existing telecommunication systems. Although the proposed project would result in a higher telecommunication demand compared to existing conditions, the project site would utilize the existing telecommunication facilities and not result in major construction related to telecommunications that could cause significant environmental impacts. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. The City of Tustin Urban Water Management Plan (UWMP) determined that there is adequate water supply to service the City through 2045. The UWMP projects that the City to have sufficient water supplies to meet expected demands in normal years, single-dry years, and multiple-dry years through 2045. The water supply till 2045 is projected to consist of primarily ground water (85 percent), and the remaining water supplies are imported water (15 percent) (Tustin 2021).

The proposed project would not generate new employees; all staff would be relocated from existing District offices in Tustin. However, the proposed project would develop an outdoor events center allowing for District-related events and community uses in accordance with the Civic Center Act, which may increase the demand for water. No events would occur on weekends or after work hours. The proposed project would not result in a substantial increase in events or event participants. The proposed project would result in a negligible increase of water demand, which would be within the projected demand of the UWMP. Furthermore, development of the proposed project would be required to comply with the provisions of CALGreen Division 5.304, Outdoor Water Use. Since the City contains adequate water supplies to meet the water demands of the proposed project and the City during normal, dry and multiple dry years, impacts would be less than significant.

c) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. As stated in Impact 3.19(a), wastewater generated at the campus is conveyed to OC SAN treatment plants No. 1 in Fountain Valley and No. 2 in Huntington Beach. Plant No. 1 has a primary and secondary capacity of 208 and 182 MGD, respectively, and Plant No. 2 has a primary and secondary capacity of 168 and 150 MGD, respectively (OC SAN 2022). The OC SAN has a total 2023-24 average daily flow of 192 MGD of wastewater, with a total of 376 MGD primary treatment capacity at Plant No. 1 and Plant No. 2 (OC SAN 2025). Thus, there is an approximate 184 MGD excess capacity at OC SAN.

The proposed project would relocate approximately 110 employees from two existing District offices. Those existing employees to be relocated under the proposed project, would continue to produce wastewater at a similar rate when compared to their existing production. However, the proposed project may result in an increase wastewater services with outdoor center events and potential community uses. As such, the proposed project would not result in a substantial increase in events or event participants and would result in a negligible

increase in wastewater production. Therefore, OC SAN has adequate capacity to serve the proposed project in addition to the existing commitments and impacts would be less than significant.

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?

Less Than Significant Impact. During construction the proposed project would generate minimal solid waste because the project site is vacant and would not create demolition debris from site clearance. CALGreen Section 5.408, Construction Waste Reduction, Disposal, and Recycling, requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. Additionally, the solid waste generated by the proposed project's operational activities would be comparable to the solid waste currently being generated at the two other District offices because approximately 110 existing employees would be relocated to the project site. However, the proposed project may generate an increase in solid waste at the proposed events center due to District-held events and community uses.

The District contracts with Ware Disposal, Inc. for solid waste disposal services. As such, the project site's solid waste would be transported by Ware Disposal, Inc. to the nearest regional landfills. Solid waste generated by the project site would be disposed of in landfills within Orange County, which include the Frank R. Bowerman Landfill and Olinda Alpha Landfill with a remaining capacities of 160,896,082 cubic yards and 17,500,000 cubic yards, respectively (CalRecycle 2025). The proposed project would result in a negligible increase in solid waste production that would be within the remaining capacity of area landfills. The proposed project would not adversely impact landfill capacity or impair attainment of solid waste reduction goals, and impacts would be less than significant.

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

Less Than Significant Impact. The District would continue to comply with federal, state, and local statutes and regulations related to solid waste, such as the California Integrated Waste Management Act and local recycling and waste programs. As discussed in Impact 3.19(d), the proposed project would generate minimal solid waste during construction as the proposed project would not create demolition debris from clearance, and solid waste from operational uses would be a negligible increase. The District and its construction contractor would continue to comply with all applicable laws and regulations and make every effort to reuse and/or recycle the construction debris that would otherwise be taken to a landfill. CALGreen Section 5.408, Construction Waste Reduction, Disposal, and Recycling, requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. Therefore, the impacts would be less than significant.

3.20 WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones (FHSZ), would the project:

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

Less Than Significant Impact. The approximately 8.51-acre project site is vacant and disturbed, with low lying vegetation and relatively flat conditions with a gradual east to west slope in southern part of the project site. The project site is in a local responsibility area (LRA) and not in a very high FHSZ (Cal Fire 2025). The nearest FHSZ is approximately 4 miles north of the project site and designated as a moderate FHSZ in a LRA. The nearest very high FHSZ in an LRA is approximately 4.4 miles north of the project site, near Peters Canyon South Trailhead. The project site does not abut a very high FHSZ and is not located within the Wildlife Urban Interface (WUI) (SILVIS 2025).

The City of Tustin 2019 Emergency Operations Plan (EOP) outlines a response plan for emergency situations associated with natural disasters, technological incidents, and national security emergencies. The EOP is a preparedness document designed to be read, understood, and exercised prior to an emergency. It provides the planning basis for hazard identification, disaster preparedness, emergency response, and recovery efforts. (Tustin 2019). Based on the City's EOP, evacuation would be made jointly, between the responsible agencies (i.e., Orange County Fire Authority, Tustin Police Department, etc.) with the primary Emergency Operations Center at 300 Centennial Way in Tustin approximately 2.2 miles northwest of the project site. The Tustin General Plan Figure PS-1, Evacuation Routes, identified several evacuation routes, with the closest evacuation route being Edinger Avenue approximately 0.40 miles northeast of the project site (Tustin 2018). As discussed in Section 1.3, *Project Description*, the project site includes an existing driveway along Legacy Road but would include installing an additional driveway along Legacy Road and a driveway along Valencia Avenue to provide access to the proposed public and secured parking lots (see Figure 5). Construction of these driveways would comply with City design requirements for new driveways and would be reviewed and approved the City of Tustin and would not interfere with a City-designated evacuation route since no identified evacuation route borders the project site. The construction of the proposed project may result in temporary roadway lane closures for utility connections. Such lane closures would be temporary and coordinated with the City of Tustin to ensure that they do not substantially interfere with circulation. Temporary lane closures during construction would not require road closures or otherwise interfere with any City-designated evacuation routes, since none border the project site. Other project components, such as the outdoor event space and education center, would be constructed entirely within the project site, with no off-site construction or staging. As such, the proposed project would not physically impede the circulation network and roadways surrounding the project site or designated evacuation routes.

The proposed project would be designed in accordance with the CBC and CFC, and the project design plans would be reviewed by the DSA. Fire suppression equipment specific to construction would be maintained on-site, in accordance to OSHA, CBC, and CFC requirements. Additionally, project construction would comply with applicable existing regulations, safety standards, and where applicable, manufacturer's specifications for the proper maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup

of spills of flammable materials. Therefore, the proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

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?

Less Than Significant Impact. The project site is a vacant parcel within an urban area, surrounded by other vacant parcels, the former MCAS Tustin, residential, commercial, and educational uses. The project site is nearly flat with a gradual downward slope from the east to west. The project site is not in an FHSZ or a WUI. The Tustin EOP states that severe wildland fire conditions could occur during Santa Ana wind conditions, specifically in unincorporated areas. The project site, like most of Orange County, would be subject to Santa Ana winds; however, it is not in an unincorporated area and would include low grade structures that would not affect prevailing winds (Tustin 2019). The proposed project would be designed in accordance with the CBC and CFC. Project design plans would also be reviewed by the DSA. Fire suppression equipment specific to construction would be maintained on site. Additionally, project construction would comply with applicable existing regulations, safety standards, and where applicable, manufacturer's specifications for the proper maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials. Therefore, the proposed project would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire due to slope, prevailing winds, and other factors. Impacts would be less than significant.

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?

Less Than Significant Impact. The project site is in an urban area and is served by existing utility infrastructure, including water and power. Development of the proposed project would require new utility hook-ups to the existing utilities in the project site area. All utilities lines would be underground. The proposed project would be designed and constructed in accordance with the CBC and the California Fire Code (CFC). These project features would not exacerbate fire risk. Development of the proposed project would not require the installation of roads and fuel breaks. Therefore, the proposed project does not include the installation or maintenance of infrastructure that could exacerbate fire risk or result in temporary or ongoing impacts to the environment. Impacts would be less than significant.

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?

Less Than Significant Impact. As discussed in Section 3.9, *Hydrology and Water Quality*, the project site is not within a FEMA-designated 100-year flood zone and there are no nearby water bodies, streams, or other conditions that would result in flooding in the project site (FEMA 2025a). There is no past evidence of landslides at or in the immediate vicinity of the project site, and the proposed project has no potential to result in or be in the path of landslides (DOC 2025d). Additionally, the project site is relatively flat with a gradual downward slope from the east to west. Therefore, the project site has a low risk of post-fire slope instability or

drainage changes. Therefore, the proposed project would not 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. A less than significant impact would occur.

3.21 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?

Less Than Significant Impact With Mitigation Incorporated. As discussed in Sections 3.4, *Biological Resources*; 3.5, *Cultural Resources*; 3.7, *Geology and Soils*; and 3.18, *Tribal Cultural Resources*, with the incorporation of mitigation measures the proposed project would result in less than significant impacts to biological resources (including nesting birds), paleontological resources, and cultural and tribal cultural resources. As discussed in Section 3.4, *Biological Resources*, although nesting birds and monarch butterfly were determined to have potential to occur on the project site, construction activities may impact the species if they are present on-site. Impacts to nesting birds (avian species) and the monarch butterfly would be less than significant with the implementation of Mitigation Measures BIO-1 and BIO-2. As discussed under Section 3.5 and Section 3.7, the project site is vacant but disturbed by the former development and uses of the former MCAS. Since the project site has been previously disturbed, it is unlikely that buried archaeological and paleontological resources would be encountered. Nevertheless, Mitigation Measures CUL-1 and GEO-1 include processes to follow in the unlikely event that archaeological or paleontological resources are encountered. With incorporation of Mitigation Measures GEO-1 and CUL-1, impacts to paleontological and archaeological resources would be less than significant.

Further, as discussed in Section 3.18, on October 8, 2025, the District received a request for consultation from the Juaneno Band of Mission Indians Acjachemen Nation-Belardes. The Tribe recommended mitigation to address the inadvertent discovery of tribal cultural resources and to minimize the potential impacts to tribal cultural resources. Although unlikely, the potential to unearth TCRs during ground disturbing activities may occur. In the unlikely event TCRs are discovered during ground-disturbing activities, Mitigation Measure TCR-1 provides guidance on how to proceed in the event that TCRs are discovered, reducing impacts to TCRs to less than significant. With identified mitigation measures, the proposed project would not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal nor eliminate important examples of the major periods of California history or prehistory. A less than significant impact would occur with the incorporation of mitigation measures.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable

when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Less Than Significant Impact. The potential for cumulative impacts occurs when the independent impacts of a given project are combined with the impacts of related projects in proximity to the project site that would create impacts that are greater than those of the project alone. As discussed previously in this IS/MND, the proposed project would have no impact, a less than significant impact, or a less than significant impact with mitigation measures to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire. Therefore, all impacts are individually limited and would not result in any cumulatively significant impact. Impacts would be less than significant, and no mitigation measures are required.

c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact. The proposed project would comply with applicable local, state, and federal laws governing general welfare and environmental protection. The implementation of required mitigation measures specified in this IS/MND would reduce impacts to less than significant. The proposed project would not, directly nor indirectly, result in environmental effects that could cause substantial adverse effects on human beings. A less than significant impact would occur.

3. Environmental Analysis

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4. References

Bay Area Air District. 2023, May. California Environmental Quality Act Air Quality Guidelines. https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines.

California Air Pollution Control Officers Association (CAPCOA). 2022. California Emissions Estimator Model (CalEEMod). Version 2022.1. Prepared by: ICF in collaboration with Sacramento Metropolitan Air Quality Management District.

California Air Resources Board (CARB). 2017, March 14. Final Proposed Short-Lived Climate Pollutant Reduction Strategy. https://www.arb.ca.gov/cc/shortlived/shortlived.htm.

———. 2022. 2022 Scoping Plan for Achieving Carbon Neutrality. https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp.pdf.

———. 2025, April 11 (accessed). Area Designations Maps/State and National. https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations.

California Department of Conservation (DOC). 1994. Generalized Mineral Land Classification of Orange County, California. https://maps.conservation.ca.gov/cgs/minerals/?page=Mineral-Land-Classification#data_s=id%3AdataSource_4-18a47b5b8e5-layer-10-192c08351d6-layer-28%3A11.

———. 2018. The Farmland Mapping and Monitoring Program. https://maps.conservation.ca.gov/agriculture/#webmaps.

———. 2025a, March 25. https://www.conservation.ca.gov/dlrp/fmmp/Pages/Important-Farmland-Categories.aspx.

———. 2025b, March 25. California Willimson Act Finder. https://maps.conservation.ca.gov/dlrp/WilliamsonAct/.

———. 2025c. *Mines and Mineral Resources*. https://maps.conservation.ca.gov/mineralresources/.

———. 2025d. *Landslide Inventory*. https://maps.conservation.ca.gov/cgs/lsi/app/.

———. 2025e. *CGS Map Sheet 58: Deep-Seated Landslide Susceptibility*. https://maps-cnra-cadoc.opendata.arcgis.com/maps/cadoc::cgs-map-sheet-58-deep-seated-landslide-susceptibility/explore?location=33.724991%2C-117.723118%2C12.44&path=.

———. 2025f. Tsunami Hazard Area Map. https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/#data_s=id%3AdataSource_3-1918f9f263a-layer-15%3A18.

4. References

———. 2025g, September 18. Trash & Recycling Services. https://www.tustinca.org/256/Trash-Recycling-Services.

———. 2025h, November 6. Well Finder. https://maps.conservation.ca.gov/doggr/wellfinder/

California Department of Fish and Wildlife (CDFW). 2025a, August 7. Conservation Plan Boundaries: HCP and NCCP [ds760]. https://data-cdfw.opendata.arcgis.com/datasets/CDFW::conservation-plan-boundaries-hcp-and-nccp-ds760/explore?location=33.708181%2C-117.819607%2C11.00.

———. 2025b, August 22 (accessed). BIOS. https://apps.wildlife.ca.gov/bios6/?bookmark=648.

California Department of Industrial Relations (DIR). 2014, May 5. Section 5218. Benzene. https://www.dir.ca.gov/title8/5218.html

California Department of Resources Recycling and Recovery (CalRecycle). 2025, November 6 (accessed). SWIS Facility/Site Search. https://www2.calrecycle.ca.gov/SolidWaste/Site/Search.

California Department of Water Resources (DWR). 2025, September 22 (accessed). Dam Breach Inundation Map. https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2.

———. 2004, February 27. Coastal Plain of Orange County Groundwater Basin. https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/2003-Basin-Descriptions/8_001_CoastalPlainofOrangeCounty.pdf.

California Department of Transportation (Caltrans). 2020, January. Caltrans Geotechnical Manual. https://dot.ca.gov/-/media/dot-media/programs/engineering/documents/geotechnical-services/202001-gm-lateralspreadingexample-a11y.pdf.

———. 2024, February. Collapsible Soil. https://dot.ca.gov/-/media/dot-media/programs/engineering/documents/geotechnical-services/202402-gm-collapsiblesoil-a11y.pdf?utm_source=chatgpt.com.

———. 2025, August 28 (accessed). California State Scenic Highway System Map. https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa.

California Environmental Protection Agency (CalEPA). 2025, November 6 (accessed). CalEPA. https://siteportal.calepa.ca.gov/nsite/map/help.

California Geological Survey (CGS). 2018. Earthquake Fault Zones A Guide for Government Agencies, Property Owners/Developers, and Geoscience Practitioners for Assessing Fault Rupture Hazards in California. https://fixthecity.org/wp-content/uploads/2021/07/SP_042.pdf

_____. 2025, September 22 (accessed). CGS Liquefaction Zones. https://www.arcgis.com/home/item.html?id=fcf1ebfe19be49819a12c404d74b4a7d.

4. References

California Natural Resources Agency (CNRA). 2018, November. Final Statement of Reasons for Regulatory Action. https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/2018_ceqa_final_statement_of%20reasons_111218.pdf.

Cowdell, Brett. 2025, September 23. Orange County Fire Authority Response Letter. Appendix I.

Department of Resources Recycling and Recovery (CalRecycle). 2025, September 22 (accessed). SWIS Facility/Site Search. https://www2.calrecycle.ca.gov/SolidWaste/Site/Search.

Department of Toxic Substances Control (DTSC). 2025a, November 6 (accessed). EnviroStor. http://www.envirostor.dtsc.ca.gov/public/.

_____. 2025b, November 6 (accessed). Cortese List. https://dtsc.ca.gov/dtscs-cortese-list/.

DJ&A. 2025. Tustin Unified School District Education Center Project Traffic Impact Study. Appendix K.

Federal Emergency Management Agency (FEMA). 2025, August 15 (accessed). FEMA's Natural Flood Hazard Layer Viewer. https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd&extent=-117.84033037300344,33.70228837728186,-117.80054784889455,33.720137845566796.

Governor's Office of Land Use and Climate Innovation (LCI). 2008, June. CEQA and Climate Change: Addressing Climate Change Through CEQA Review. Technical Advisory. https://opr.ca.gov/docs/june08-ceqa.pdf.

HANA Resources. 2025a, September 2. Biological Resources Evaluation for Tustin Unified School District Educational Center Project, City of Tustin, Orange County, California. Appendix C.

———. 2025b, September 4. Historical/Archaeological Resources Survey Report. Appendix D.

———. 2025c, September 4. Paleontological Resources Assessment Report. Appendix F.

Institution of Lighting Engineers (ILE). 2003, May. Guidance Notes for the Reduction of Light Pollution. https://www.gov.je/SiteCollectionDocuments/Planning%20and%20building/SPG%20Lightpollution%202002.pdf.

Irvine Ranch Water District (IRWD). 2016, June. 2015 Urban Water Management Plan. https://www.irwd.com/images/pdf/doing-business/environmental-documents/UWMP/IRWD_UWMP_2015_rev_01-03-17_FINAL.pdf

National Parks Service (NPS). 2025, September 8 (accessed). National Register Database and Research. https://www.nps.gov/subjects/nationalregister/database-research.htm#table

Office of Environmental Health Hazard Assessment (OEHHA). 2015, February. Air Toxics Hot Spots Program Risk Assessment Guidelines. In *Guidance Manual for Preparation of Health Risk Assessments*. http://oehha.ca.gov/air/hot_spots/2015/2015GuidanceManual.pdf.

4. References

Office of Historic Preservation, California (OHP). 2025, September 15 (accessed). California Historical Resources. https://ohp.parks.ca.gov/ListedResources/?view=county&criteria=54.

Orange, County of. 2025, September 15 (accessed). Regional & Wilderness Parks. https://www.ocgov.com/residents/communities-neighborhoods/regional-wilderness-parks.

Orange County Airport Land Use Commission (OC ALUC). April 17, 2008. Orange County Land Use Plan for John Wayne Airport. https://files.ocair.com/media/2021-02/JWA_AELUP-April-17-2008.pdf?VersionId=cB0byJjdad9OuY5im7Oaj5aWaT1FS.vD

Orange County Fire Authority (OCFA). 2025, September 15 (accessed). Operations. https://ocfa.org/about-us/departments/operations/#divisions.

Orange County Sanitation District (OC SAN). 2025, May 30 (accessed). Regional Sewer Service.https://www.ocsan.gov/wp-content/uploads/2024/10/Facts-and-Key-Statistics.pdf/.

———. 2022, June 22. Executive Summary Fiscal Years 2022-23 and 2023-24. https://www.ocsan.gov/wp-content/uploads/2024/06/FYs-202223-2324-Executi.pdf

Orange County Transportation Authority (OCTA). 2025, May 21 (accessed). North County System Map. https://www.octa.net/ebusbook/routePdf/NorthCounty.pdf?n=202411

Padre Associates. (Padre). 2025, May. Phase I Environmental Site Assessment. Appendix E.

———. 2025, December. Phase II Environmental Site Assessment. Appendix G.

Roque, Matt. 2025, September 30. Tustin Police Department Response Letter. Appendix J.

South Coast Air Quality Management District (South Coast AQMD). 1993. California Environmental Quality Act Air Quality Handbook.

———. 2008a, July. Final Localized Significance Threshold Methodology. https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf.

———. 2008b, October. Draft Guidance Document: Interim CEQA Greenhouse Gas (GHG) Significance Threshold. https://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf.

———. 2010, September 28. Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #15. http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf.

———. 2011. Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf?sfvrsn=2.

4. References

———. 2022, December 2. 2022 Air Quality Management Plan (AQMP). https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=16.

———. 2023, March. South Coast AQMD Air Quality Significance Thresholds. https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25.

Southern California Association of Governments (SCAG). 2024. Connect SoCal Plan: The 2024–2050 Regional Transportation Plan / Sustainable Communities Strategy of the Southern California Association of Governments. https://scag.ca.gov/connect-socal.

Spatial Analysis For Conservation and Sustainability (SILVIS) Lab. 2019, May 17. Wildland Urban Interface. https://www.arcgis.com/home/webmap/viewer.html?layers=a4985d64969743db8feddf01c96c9435.

State Water Resources Control Board (SWRCB). 2025, November 6 (accessed). GeoTracker. http://geotracker.waterboards.ca.gov/.

Sustainable Groundwater Management Act (SGMA). 2025, August 25 (accessed). SGMA Basin Prioritization Dashboard. https://gis.water.ca.gov/app/bp-dashboard/final/.

Tustin, City of. 2018a, November. Tustin General Plan: Land Use Map. https://www.tustinca.org/DocumentCenter/View/720/General-Plan-Map-PDF?bidId=.

———. 2018b, November. Tustin General Plan. https://www.tustinca.org/DocumentCenter/View/713/City-of-Tustin-General-Plan-PDF.

———. 2019, November. Emergency Operations Plan. https://www.tustinca.org/DocumentCenter/View/570/Emergency-Operations-Plan-PDF

———. 2021, June. Tustin 2020 Urban Water Management Plan. https://www.tustinca.org/DocumentCenter/View/5138/Tustin-2020-UWMP.

———. 2025a, March 27. MCAS Tustin. https://www.tustinca.org/836/MCAS-Tustin.

———. 2025b, January 7. Tustin Legacy Specific Plan. https://www.tustinca.org/DocumentCenter/View/706/Tustin-Legacy-Specific-Plan-PDF?bidId=.

———. 2025c, September 22 (accessed). The 2021 Historical Resources Survey. https://storymaps.arcgis.com/stories/fa1ce187177640ecbaaad8d97440a0df.

———. 2025c, September 22 (accessed). Primary Record: 1901 Walnut Avenue. https://www.tustinca.org/DocumentCenter/View/17639/Walnut-Avenue-1901.

———. 2025e, September 15 (accessed). Parks Information. https://www.tustinca.org/715/Parks-Information.

4. References

United States Army Corps of Engineers (USACE). 2025, August 25 (accessed). National Inventory of Dams. https://nid.sec.usace.army.mil/viewer/.

United States Census Bureau (US Census). 2025a, September 19 (accessed). Tustin: 2024: ACS 1-Year Estimates Data Profiles. https://data.census.gov/table/ACSST1Y2024.S0101?q=Tustin.

———. 2025b September 19 (accessed). Santa Ana: 2024: ACS 1-Year Estimates Data Profiles. https://data.census.gov/table/ACSST1Y2024.S0101?q=Santa+Ana.

———. 2025c September 19 (accessed). Irvine: 2024: ACS 1-Year Estimates Data Profiles. https://data.census.gov/table/ACSST1Y2024.S0101?q=Irvine.

United States Environmental Protection Agency (USEPA). 2025, November 6 (accessed). EnviroMapper for EnviroFacts. https://enviro.epa.gov/enviro/em4ef.home.

United States Fish and Wildlife Service (USFWS). 2024a, May 31(accessed). USFWS Threatened and Endangered Species Active Critical Habitat. https://fws.maps.arcgis.com/home/webmap/viewer.html?webmap=9d8de5e265ad4fe09893cf75b8dbfb77.

United States Geological Survey (USGS). 2025, September 29 (accessed). Areas of Land Subsidence in California. https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html.

University of California, Davis (UC Davis). June, 2020. Chino Series. https://casoilresource.lawr.ucdavis.edu/sde/?series=Chino&utm_source#osd.

York. 2006. Residential Packaged Equipment. https://www.york.com/residential-equipmenUheating-and-cooling/residential-packaged-equipment.

5. List of Preparers

APPLICANT AND LEAD AGENCY

Tustin Unified School District

Tom Rizzuti, Director, Facilities and Planning

CONSULTANTS AND TECHNICAL EXPERTS

CEQA Consultant: PlaceWorks

Malia Durand, Principal

Mariana Zimmermann, Associate Principal

Jared Bradford, Associate

Angel Castro, Project Planner

Chris Shields, Senior Associate, Noise and Vibration

John Vang, Senior Associate, Air Quality/GHG

Lance Park, Senior Associate, Air Quality/GHG

Emily Parks, Associate, Air Quality/GHG

Cary Nakama, Graphic Designer

Biological, Paleontological, and Cultural Resources: HANA Resources

Sloane Sanchez, Senior Biologist

Ash Walker, Staff Biologist

R. Austin Isakson, Associate Biologist

Ron C. Schmidtling, Principal Paleontologist

Elizabeth Beckner, Report Writer

Melissa Portilla, Project Archaeologist

Michael Hogan, Principal Investigator

Bai Tang, Principal Investigator

5. List of Preparers

Transportation: DJ&A

Bill Delo, P.C.

Phase I Environmental Site Assessment: Padre Associates, Inc.

Alan Churchill, PG

Appendix A Air Quality and Greenhouse Gas Appendix

Appendix

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Appendix B Health Risk Assessment and Background and Modeling Data

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Appendix C Biological Resources Evaluation for Tustin Unified School District Educational Center Project, City of Tustin, Orange County, California

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Appendix D Historical/Archaeological Resources Survey Report

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Appendix E Phase I Environmental Site Assessment

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Appendix F Paleontological Resources Assessment Report

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Appendix G Phase II Environmental Site Assessment

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Appendix H Noise Fundamentals

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Appendix I Orange County Fire Authority Response Letter

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Appendix J Tustin Police Department Response Letter

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Appendix K Tustin Unified School District Education Center Project Traffic Impact Study

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