

**Final
Environmental Impact Statement for the
Chet Holifield Federal Building
Tenant Relocation
Laguna Niguel, California**

March 2021



Prepared for:
GSA Region 9

Prepared by:
Potomac-Hudson Engineering, Inc.

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COVER SHEET

The United States (U.S.) General Services Administration (GSA) proposes to remove existing tenants from the Chet Holifield Federal Building (CHFEB) located in Laguna Niguel, California, and relocate them to a newly constructed facility adjacent to the existing building and/or lease space in the Orange County market, and dispose of any excess property at the CHFEB site (the Project). Future development of the CHFEB site is not included as part of GSA's Proposed Action, but is considered as a reasonably foreseeable scenario as described in Chapter 2 of this EIS. The CHFEB, owned by GSA, is home to various federal agency tenants, with the United States Citizenship and Immigration Services (USCIS) serving as the largest tenant. Currently, the working space for the tenants of CHFEB does not meet GSA's current building, accessibility, and security standards. The GSA has prepared this Final Environmental Impact Statement (EIS), which examines the purpose and need for this project; alternatives considered; the existing environment that could be affected; the potential impacts resulting from each of the alternatives; and proposes best management practices and/or mitigation measures. Alternatives considered include a Hybrid Lease/Construction Alternative, a Lease Relocation Alternative, and a No Action Alternative. The Final EIS also discusses those alternatives that GSA considered, but eliminated from consideration.

A Notice of Availability was published in the *Federal Register* on July 8, 2020 issuing the Draft EIS. A virtual public meeting was held on Tuesday, August 4, 2020. The comment period for the Draft EIS closed on Friday, September 4, 2020. The 40 comments received during the comment period were considered in preparation of this Final EIS. A summary of public comments received and GSA's responses are included in Appendix G of this Final EIS.

A Final EIS virtual public meeting will be held on Tuesday, March 16, 2021 from 4:30pm to 6:30pm Pacific Time. Instructions for accessing the meeting can be found on <http://www.gsa.gov/ChetHNEPA>. The public was notified of the CHFEB Final EIS virtual public meeting through publication of a Notice of Availability in the *Federal Register*, as well as multiple other channels of communication, including two newspaper ads, letters to interested parties, and social media posts.

Comments on the Final EIS must be received by Wednesday, April 7, 2021 and may be emailed to Osmahn.Kadri@gsa.gov or sent to:

Potomac-Hudson Engineering, Inc.
Attention: CHFEB Final EIS
77 Upper Rock Circle, Suite 302
Rockville, MD 20850

For individuals with sensory disabilities, this document can be made available in alternate formats. To obtain a copy in an alternate format, receive special assistance to attend and participate in the Final EIS virtual public meeting, or for further information concerning this Final EIS, please contact Osmahn Kadri at the email or address provided above or call 415-522-3617.

After comments are received from the public and reviewing agencies, GSA may:

1. Give environmental approval to the Project by signing a Record of Decision (ROD) no sooner than 30 days after the Final EIS is issued. In the ROD, GSA will explain all the factors that were considered in reaching its final decision, including the environmental factors. GSA will identify the environmentally preferable alternative or alternatives and may select one of the alternatives or a combination of alternatives analyzed in the EIS;
2. Undertake additional environmental studies; or
3. Abandon the Project.

If the Project is given environmental approval and/or necessary funding/authorizations are received, GSA could proceed with all or part of the Project.

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SUMMARY

The General Services Administration (GSA) proposes to remove the existing tenants from the Chet Holifield Federal Building (CHFB) located in Laguna Niguel, California, and relocate them to a newly constructed facility adjacent to the existing building and/or lease space in the Orange County market, and dispose of any excess property at the CHFB site (the Project). Future development of the CHFB site is not included as part of GSA's Proposed Action, but is considered as a reasonably foreseeable scenario as described in Chapter 2 of the EIS. The Proposed Action would accommodate the long-term office space requirements for the current tenants that would meet applicable building, accessibility, and security standards. The Proposed Action would also make such accommodations primarily within the Orange County, California market in a cost-effective manner that would not require substantial personnel relocations or majorly disrupt the federal tenants from achieving their agency mission. The Proposed Action would also dispose of any excess federal property within the 92-acre CHFB site.

ENVIRONMENTAL REVIEW PROCESS

GSA prepared this Environmental Impact Statement (EIS) to analyze the potential impacts of the Proposed Action: the relocation of tenants of the CHFB to new office space that meets all appropriate and applicable building, accessibility, and security standards. The EIS was prepared in accordance with the National Environmental Policy Act (NEPA) of 1969 as amended (42 United States Code [USC] 4321 *et seq.*), GSA Public Building Service (PBS) NEPA Desk Guide, and other relevant federal and state laws and regulations.

A Notice of Intent (NOI) for the EIS was published in the *Federal Register* on November 15, 2019. The NOI listed the end of the public scoping comment period as December 10, 2019; however, GSA accepted comments through December 17, 2019.

In advance of the NOI publication in the *Federal Register*, GSA published two advertisements in a local newspaper the weeks preceding an October 2, 2019 public scoping meeting. The advertisements indicated GSA's intent to prepare an EIS and conduct a scoping meeting; provided a brief description of the project; identified the public scoping meeting time and location; and included instructions to submit a comment. The advertisement was published in the Orange County Register on September 20 and 22, 2019.

A Notice of Availability (NOA) was published in the *Federal Register* by GSA on July 8, 2020 issuing the Draft EIS. In addition, the USEPA published an additional notice in the *Federal Register* on July 17, 2020. The public was also notified of the CHFB Draft EIS public meeting through multiple other channels of communication, including two newspaper ads, letters to interested parties, and social media posts. The NOA, newspaper ads, letter to interested parties, and social media posts are included in Appendix F. The comment period for the Draft EIS closed on Friday, September 4, 2020. The 40 comments received during the comment period were considered in preparation of this Final EIS. A summary of public comments received and GSA's responses are included in Appendix G of the Final EIS.

INTRODUCTION

The CHFB is located in Laguna Niguel, California, between Los Angeles and San Diego, and approximately 4 miles from the Pacific coastline. The building, used primarily for federal office space, is located on a 92-acre site and is the only federally-owned facility in south Orange County, California. Construction of the building was completed in 1971. The CHFB was designed by William L. Pereira, and consists of six stories as well as a partial underground section and mechanical penthouse. The building is multi-tiered, with the largest floor area on the first floor and building floors continually reducing in size with each added level. Structures on the CHFB site include a central utility plant to the north, two guard stations, a Services Support Building, fire pump house, cooling tower, and thermal energy storage tank.

Amenities include a full-service cafeteria, health unit, credit union, fitness center, and a day care center located in separate facilities on the same site.

The CHFEB is owned by GSA and home to various federal agency tenants, with the United States Citizenship and Immigration Services (USCIS) serving as the largest tenant. As the agency responsible for lawful immigration to the United States (U.S.), USCIS provides services that include citizenship, immigration of family members, employment in the U.S., verification of authorized employment, humanitarian programs, adoptions, civic integration and genealogy. The USCIS California Service Center (CSC) in the CHFEB is one of five Service Centers in the nation. While much of the CSC includes aspects of typical office space, the CSC has a number of security requirements that are not easily accommodated in a standard office space.

Other CHFEB tenants include the following: Customs and Border Protection, Immigration and Customs Enforcement (ICE); ICE Office of Human Capital; Defense Contract Management Agency; GSA Federal Acquisition Service; GSA Office of Inspector General; GSA PBS, Office of Personnel Management; International Group of Treasury Associations; Internal Revenue; U.S. Army, Army Recruiting; and U.S. Army Corps of Engineers.

PURPOSE AND NEED

The purpose of the Proposed Action is to accommodate the long-term office space requirements for the current tenants located at the CHFEB that would meet applicable building, accessibility, and security standards. The purpose is also to make such accommodations primarily within the Orange County, California market in a cost-effective manner that would minimize personnel relocations and disruptions to the federal tenants and their agency missions. The Proposed Action would also dispose of any excess federal property within the 92-acre CHFEB site.

The Proposed Action is needed because the current working space does not meet GSA's current federal building, accessibility, and security standards. There have been no modifications to the CHFEB since the 1980s, other than some energy-related modifications. Most of the building's infrastructure is beyond its useful life and deficiencies have been documented in all major mechanical and electrical systems, including life-safety, fire protection, and fire sprinkler systems. Additionally, numerous issues exist, including the presence of asbestos containing materials (ACM) and the need to improve the building's response to future seismic events. The Proposed Action is also needed to address the Public Buildings Reform Board (PBRB) recommendations under P.L. 114-287, the Federal Assets Sale & Transfer Act of 2016 (FASTA) which made a recommendation of disposal of the CHFEB (see Section 2.1.1.1 of the EIS for additional information).

The Proposed Action to remove existing tenants from the CHFEB and relocate them would meet this purpose and need.

SUMMARY OF THE PROPOSED ACTION AND ALTERNATIVES

GSA evaluated three alternatives in this EIS: the Hybrid Lease/Construction (Alternative 1), the Lease Relocation Alternative (Alternative 2), and the No Action Alternative. GSA has identified Alternative 2 as the Preferred Alternative in the Final EIS.

Hybrid Lease/Construction (Alternative 1)

The Hybrid Lease/Construction Alternative would include construction of a new federal building on a portion of the existing 92-acre site to house the USCIS (approximately 2,000 staff) while relocating all other tenants into existing Class A lease space within the region. The current building would be vacated by current tenants, and the rest of the property not used for construction of the new federal building would be reported as excess in accordance with federal policy and disposed.

The new concept building would be approximately 380,000 square feet across four levels, and would include a parking lot, day care facility, cafeteria, guard booths, and loading dock. The overall footprint for

this new space would encompass 27.15 acres of the existing 92-acre site. The facility would be designed with Anti-Terrorism Force Protection (ATFP) measures for proper security. In addition, GSA would aim for the new federal building to have a Leadership in Energy and Environmental Design (LEED®) Platinum certification, which is the highest LEED® certification. Technologically sound and proven methods would be implemented to meet the applicable energy and sustainability requirements of the LEED® certification process and to minimize energy use, water use, and waste generation.

Aside from USCIS, who would stay on the property currently occupied by the CHFEB, the other tenants would be relocated to existing Class A leased space primarily within Orange County. Relocation would be based on the expressed geographic areas within which each agency has indicated it would like to operate. The exact location of new leased office space is not currently known, but it is anticipated that at least 55 percent of the remaining tenants would relocate in south or central Orange County no farther north than Irvine, with up to 45 percent relocating to areas north of Irvine such as Santa Ana, Anaheim, or Long Beach.

Future Redevelopment

Any future use of the CHFEB following disposal is not a part of GSA's Proposed Action; however, considering the large size and desirable location of the parcel, it is foreseeable that some level of redevelopment or reuse of the site is likely to occur following disposal. Therefore, a range of potential future reuse scenarios of the site are considered in this analysis as indirect impacts.

If the property does not remain in federal ownership after going through the federal disposal process, future use of the portion of the site that is disposed (i.e., 64.85 acres) would be dictated by the new owner and the City of Laguna Niguel re-zoning process (as applicable). Because a developer is not known at this time, no detailed plan exists for redevelopment of the property. This includes unknown density and composition of future commercial, residential, or mixed-use development which could occur. However, before redeveloping the 64.85 acre-parcel, it is possible that two scenarios could apply. If the property remained in federal ownership, the appropriate level of NEPA analysis may be required by a future federal proponent. If the property is transferred out of federal ownership, the City of Laguna Niguel may require the new owner to complete the appropriate level of documentation pursuant to the California Environmental Quality Act (CEQA), and obtain certain land use approvals for any proposed development or reuse. As part of the CEQA process, the City would identify the environmentally superior alternative, and the developer would have to adhere to measures to mitigate adverse impacts. Potential future development requirements are discussed in Chapter 3 of this EIS for each resource, as applicable, for informational purposes; however, the GSA is not subject to these requirements nor are these requirements commitments of GSA. A project may not be approved as submitted under CEQA if mitigation measures are not able to substantially lessen any significant environmental effects associated with the project.

As there are currently no future plans for the future use of the site nor is future use a part of GSA's action, a range of general potential future development scenarios are considered in this analysis, based on potential anticipated future uses of the site and present judgement of GSA at the time of this EIS:

- **Renovation of the existing CHFEB.** The new owner would conduct repairs and alterations to address known deficiencies in the existing building, including those to address code compliance, security and seismic safety in the building; ACM abatement throughout the building; conducting updates to the fire suppression and fire alarm systems along with modifications to fire life-safety exiting pathways in the building; and removal of accessibility barriers throughout the building and on the site which are required by federal law. It is assumed building occupancy would remain similar to current conditions of approximately 3,000 personnel.
- **Demolition of the existing CHFEB and construction of new mixed-use space.** The new owner would demolish the existing CHFEB and construct a new development in accordance with the City of Laguna Niguel rezoning process (as applicable). New development could include a mix of commercial and residential development, with appropriate parking and support facilities.

Potential future use scenarios are ultimately dependent on the future developer and not GSA, and are subject to change.

GSA's planning with respect to compliance with historic preservation requirements, and how that may affect future development at the site, is being handled through the Section 106 process (see Section 3.2, Cultural Resources of the EIS).

Preferred Alternative - Lease Relocation Alternative (Alternative 2)

Under the Preferred Alternative, all tenants, including USCIS, would relocate to Class A lease space primarily within Orange County. The entire CHFEB site would then be reported as excess and disposed in accordance with federal policy.

Similar to Alternative 1, all tenants, with the exception of USCIS, would be relocated based on the expressed delineated geographic areas within which each agency has indicated it would like to operate. There are limited options for relocating USCIS within the County due to the number of tenants and the specific security requirements for the agency office space. It would be assumed that USCIS would be relocated to Irvine, Santa Ana, or Anaheim, where greater office space availability exists.

Relocation of tenants might require build out of special use spaces, dependent upon agency mission needs, but these spaces would be accommodated in existing commercial space and would not require new land disturbance.

Future Redevelopment

Future development of the existing parcel under the Preferred Alternative would be similar to as described for Alternative 1, but for development of the entire 92-acre site. Similar to Alternative 1, the density and composition of future commercial, residential or mixed-use development are unknown as there are currently no future plans for the future use of the site nor is future use a part of GSA's action. It is assumed the City of Laguna Niguel would likely require the future owner to complete the appropriate level of NEPA or CEQA documentation and obtain necessary land use approvals for any proposed development.

Differences from the Alternative 1 scenario include:

- **Renovation of the existing CHFEB and new construction.** The new owner would conduct repairs and alterations to address known deficiencies in the existing building similar to as described for Alternative 1. In addition, development could occur on underutilized portions of the 92-acre site, particularly on the south or western end of the site. Development could include commercial, residential, office space, or a mix of land uses.
- **Demolition of the existing CHFEB and new construction.** The new owner would demolish the existing CHFEB and construct a new mixed-use development similar to as described for Alternative 1, but for the entire 92-acre site.

Similar to Alternative 1, potential future use scenarios are ultimately dependent on the future developer and not GSA, and are subject to change. Furthermore, GSA's planning with respect to compliance with historic preservation requirements, and how that may affect future development at the site, is being handled through the Section 106 process (see Section 3.2, Cultural Resources of the EIS).

No Action Alternative

The No Action Alternative assumes that tenants would remain within the existing CHFEB and no new construction or relocation would occur. Minor repairs would occur as needed and maintenance and operation of the existing facilities would continue. However, this alternative would not meet the purpose and need of the project, as tenants would continue to occupy office space that does not meet applicable building code, accessibility, and security standards.

IMPACT COMPARISON MATRIX

This EIS evaluates the potential impact on the environmental conditions from implementing the Hybrid Lease/Construction Alternative, Lease Relocation Alternative (the Preferred Alternative), or the No Action Alternative. For each resource area analyzed in this EIS, the expected consequences of the alternatives are summarized in Table ES-1.

Table ES-1. Summary Comparison of Alternatives

Hybrid/Lease Construction Alternative (Alternative 1)	Preferred Alternative - Lease Relocation (Alternative 2)	No Action Alternative	Impact Reduction Measures
Cultural Resources			
<p>Construction: Potential for an effect to historic properties from ground disturbing activities in areas unsurveyed for archaeological resources.</p> <p>Operations: Moderate permanent adverse effects on an NRHP-eligible historic property (i.e., the CHFB) from partial demolition of the landscaping and site plan, and from visual impacts related to the loss of views to and from the historic property. Disposal of the property out of federal ownership could result in an effect to historic properties under NHPA and significant impacts under NEPA. The Section 106 process is currently underway to determine effects to the property under NHPA, and results of this process, as well as any required mitigation measures, will be detailed in the ROD for this EIS.</p> <p>Future Redevelopment: Future development would be subject to the outcome of the Section 106 process that is currently underway, the results of which will be documented in the ROD for this EIS. Future development at the site could result in an effect to archaeological resources, and visual impacts related to the loss of views to and from the historic property under a renovation scenario.</p>	<p>Construction: No impacts to cultural resources.</p> <p>Operations: Disposal of the property out of federal ownership could result in an effect to historic properties from future development. The Section 106 process is currently underway to determine effects to the property under NHPA, and results of this process, as well as any required mitigation measures, will be detailed in the ROD for this EIS.</p> <p>Future Redevelopment: Similar to Alternative 1 Future Redevelopment.</p>	<p>No impacts to cultural resources.</p>	<p>Under Alternative 1, the project could be redesigned to change the height of the new construction to less than 4 stories. The revised height could be determined by a study of the viewshed toward the CHFB that would determine the maximum massing and height of the new construction that would retain the current distant view of the historic property.</p> <p>In consideration of archaeological resources, the APE should be considered sensitive for prehistoric resources and monitoring by both a qualified archaeologist and a Native American monitor is recommended during any ground-disturbing activities. It is further recommended that a discovery plan be put into place that governs treatment of any inadvertent discoveries of cultural resources that may occur during project construction.</p> <p>The Section 106 process is currently underway to determine effects to the property under NHPA, and results of this process, to include any applicable impact reduction measures, will be detailed in the ROD for this EIS.</p>
Air Quality and Greenhouse Gas Emissions			
<p>Construction: Minor impacts during construction of new building from use of equipment, vehicles, and earth</p>	<p>Construction: Negligible impacts from emissions</p>	<p>Minor impacts from ongoing vehicle trips to site and</p>	<p>The following measures would be implemented during construction of a new USCIS building for Alternative 1:</p>

Hybrid/Lease Construction Alternative (Alternative 1)	Preferred Alternative - Lease Relocation (Alternative 2)	No Action Alternative	Impact Reduction Measures
<p>moving. Emissions would not exceed <i>de minimis</i> thresholds for any criteria pollutants. Negligible increases in GHGs.</p> <p>Operation: Negligible to minor impacts during operations due to emissions generated from building electricity and heating uses at new USCIS building. Less than significant impacts from tenant relocation to newly leased spaces.¹</p> <p>Future Redevelopment: Minor to moderate indirect impacts from construction activities, similar to construction of a USCIS building. Minor to moderate impacts during operations due to long term increases in vehicle trips to the current CHFB site.</p>	<p>generated during build-outs for lease space.</p> <p>Operations: Less than significant impacts from tenant relocation to newly leased spaces.¹</p> <p>Future Redevelopment: Similar to Alternative 1 Future Redevelopment, but to a greater intensity.</p>	<p>periodic generator maintenance.</p>	<ul style="list-style-type: none"> • Adopting BMPs detailed in the SCAQMD Rule 403 for fugitive dust. • Stabilizing open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative where appropriate, including both inactive and active sites, during workdays, weekends, holidays, and windy conditions. • Installing wind fencing and phasing grading operations where appropriate, and using water trucks for stabilization of surfaces under windy conditions. • When hauling material and operating non-earthmoving equipment, preventing spillage and limiting speeds to 15 miles per hour. Earth-moving equipment would be limited to 10 miles per hour. • Paving roadways where necessary, and maintaining them in a clean condition by promptly removing spilled or tracked dirt or other materials. • Covering open equipment when conveying or transporting material likely to prevent material from becoming airborne. • Minimizing the use and number of trips of heavy equipment. • Maintaining and tuning all engines per manufacturer specifications to perform at USEPA certification levels, where applicable, and to perform at verified standards applicable to retrofit technologies. • Conducting periodic, unscheduled inspections to limit unnecessary idling and to ensure that construction equipment is properly maintained, tuned, and modified consistent with established specifications. • Prohibiting construction vehicles both on- and off-site from excess idling, consistent with current CARB Regulations. • Prohibiting tampering with engines and requiring continuing adherence to manufacturer's recommendations. • Encouraging bids that include use of energy and fuel-efficient fleets and Best Available Control Technology,

Hybrid/Lease Construction Alternative (Alternative 1)	Preferred Alternative - Lease Relocation (Alternative 2)	No Action Alternative	Impact Reduction Measures
			<p>particularly those seeking to deploy zero-emission technologies.</p> <ul style="list-style-type: none"> • Using alternative fueled vehicles and construction equipment where feasible. • Using energy efficient lighting systems, such as LED technology, where feasible. • Using lighter-colored pavement where feasible. • Recycling construction debris to the maximum extent feasible. • Planting shade trees in or near construction projects where feasible. • Developing a construction traffic and parking management plan to minimize traffic interference and maintains traffic flow. <p>Similar measures may be required and implemented for any future development on the site as part of Alternatives 1 and 2, regardless of ownership.</p>
Socioeconomics			
<p>Construction: Moderate impacts to recreational facilities from closure of El Lazo Basketball Courts. Minor beneficial impacts during construction from increased jobs and spending.</p> <p>Operations: Moderate impacts to the local economy in Laguna Niguel due to shift of approximately 1,000 workers to new leased locations in the County. Long term beneficial impacts due to increased tax revenue following land transfer.</p>	<p>Construction: Moderate impacts to recreational facilities from closure of El Lazo Basketball Courts. Negligible to minor beneficial impacts during construction from increased jobs and spending.</p> <p>Operations: Moderate to significant impacts to local economy in Laguna Niguel due to the shift of approximately 3,000 workers to new leased locations in the County. Long term beneficial impacts due to increased tax revenue following land transfer.</p>	<p>Beneficial impacts of federal workforce remaining at CHFB in Laguna Niguel.</p>	<p>None identified.</p>

Hybrid/Lease Construction Alternative (Alternative 1)	Preferred Alternative - Lease Relocation (Alternative 2)	No Action Alternative	Impact Reduction Measures
<p>Future Redevelopment: Minor beneficial impacts during construction; similar to construction of a USCIS building. Moderate to significant impacts during operations from increased population in Laguna Niguel, strain on housing stock and community services. Moderate, long-term beneficial impacts from increased spending and tax revenue.</p>	<p>Future Redevelopment: Similar to Alternative 1 Future Redevelopment, but to a greater intensity.</p>		
Geology, Seismicity, and Soils			
<p>Construction: Negligible impacts on geology and topography; minor impacts to soils from land disturbance; beneficial impacts to seismicity due to decreased risk of seismic hazards to building tenants.</p> <p>Operations: No impacts to geology, topography, or seismicity. Negligible impacts to soils due to increased impervious surfaces and runoff.</p> <p>Future Redevelopment: Minor to moderate impacts to soils, geology, and topography during construction due to excavation and earth work activities. During operations, no impacts geology, topography, or seismicity. Minor impacts to soils due to increased impervious surfaces and runoff.</p>	<p>Construction and Operations: No impacts to geology, seismicity, topography, or soils during construction or operations.</p> <p>Future Redevelopment: Similar to Alternative 1 Future Redevelopment, but to a greater intensity.</p>	<p>No short- or long-term impacts to geology or topography would be expected. Negligible impacts to soils could occur due to land disturbance and soil erosion from ongoing maintenance activities. Impacts to the building from seismic disturbance might occur, as it is not currently constructed to California Building Code for seismic safety.</p>	<p>Refer to Impact Reduction Measures for Water Resources.</p> <p>Prior to issuance of a grading permit for any pavement in excess of 3,000 square feet, the future developer may be required to submit a site-specific geotechnical study to the City of Laguna Niguel for approval (City of Laguna Niguel 2015). Per City requirements, all design, grading and construction is to be performed in accordance with requirements of the City of Laguna Niguel ordinances and the most recent California Building Code applicable at time of grading. Following approval, the future developer may be required to apply for a grading permit with the City of Laguna Niguel.</p>

Hybrid/Lease Construction Alternative (Alternative 1)	Preferred Alternative - Lease Relocation (Alternative 2)	No Action Alternative	Impact Reduction Measures
Land Use			
<p>Construction: Minor impacts to adjacent land uses from construction activities from dust, traffic, noise, and road closures.</p> <p>Operations: No impacts to land use.</p> <p>Future Redevelopment: Negligible impacts during construction, similar to construction of a USCIS building. If the remaining parcel is transferred out of federal ownership, rezoning would be required.</p>	<p>Construction and Operations: No impacts to land use during construction or operations.</p> <p>Future Redevelopment: Similar to Alternative 1 Future Redevelopment, but to a greater intensity.</p>	<p>No impacts to land use.</p>	<p>Refer to Air Quality and Greenhouse Gases; Transportation and Traffic, and Noise for measures to reduce construction impacts on land use-related concerns related to as fugitive dust, traffic, or noise.</p>
Visual Resources and Aesthetics			
<p>Construction: Minor impacts from construction activities introduced into the visual landscape.</p> <p>Operations: Minor to moderate impacts from introduction of new building into viewshed.</p> <p>Future Redevelopment: Minor impacts from construction activities, similar to construction of a new USCIS building. Moderate to significant impacts during operations from permanent alteration to the landscape with potential demolition of CHFB.</p>	<p>Construction and Operations: No impacts to visual resources during construction or operation.</p> <p>Future Redevelopment: Similar to Alternative 1 Future Redevelopment, but to a greater intensity.</p>	<p>No impacts to visual resources.</p>	<p>The following measures would be implemented during construction of a new USCIS building for Alternative 1:</p> <ul style="list-style-type: none"> • Consult with local officials, consider local requirements for new building construction, and comply with state and local building codes to the maximum extent practicable. • Integrate programs of design/architecture and construction excellence into the new facility in order to optimize building performance and aesthetics, including adherence to P100 Standard which establishes design criteria and standards for new government buildings. • Design exterior lighting to meet physical security requirements but controlled to minimize light trespass (e.g., direct light downward and minimize glare). Fixtures for the security fence would be a similar style. Exterior lighting would be consistent with the local ordinance code for outdoor lighting (Supplemental nonresidential regulations 9-1-45-14). • Incorporate landscaping and screening (trees and vegetation) into the exterior design to provide aesthetic benefits to the surrounding community, consistent with GSA's Urban Development/Good Neighbor Program. <p>Similar measures regarding consulting with local officials, consideration of local requirements for new building</p>

Hybrid/Lease Construction Alternative (Alternative 1)	Preferred Alternative - Lease Relocation (Alternative 2)	No Action Alternative	Impact Reduction Measures
			construction, and compliance with state and local building codes may be required and implemented for any future development on the site as part of Alternatives 1 and 2, regardless of ownership.
Water Resources			
<p>Construction: Minor impacts to surface waters and wetlands from runoff; and disturbance of groundwater during excavation. Site is located outside of the 100-year floodplain.</p> <p>Operations: Minor impacts due to potential long-term increases in stormwater runoff and decreases in groundwater recharge.</p> <p>Future Redevelopment: Minor impacts to surface waters, wetlands, and groundwater during construction, similar to construction of a new USCIS building. Minor impacts to surface waters and groundwater during operations, similar to operations of a new USCIS building.</p>	<p>Construction and Operations: No impacts to water resources during construction or operations.</p> <p>Future Redevelopment: Similar to Alternative 1 Future Redevelopment, but to a greater intensity.</p>	Negligible impacts to surface waters due to runoff during ongoing maintenance activities.	<p>The following measures would be implemented during construction of a new USCIS building for Alternative 1:</p> <ul style="list-style-type: none"> • Compliance with State's Construction General Permit (if a construction project involving 1 acre or greater of soil disturbance). • Preparation of an Erosion and Sediment Control Plans showing all BMPs for construction, even for a project that disturb less than 1 acre of soil and are not covered by the Construction General Permit. • Implementation of BMPs detailed in the Orange County Stormwater Program's Construction Runoff Guidance Manual related to erosion control, sediment control, wind erosion control, tracking control, non-stormwater management, waste management and materials pollution control, and inspection and maintenance. • Preparation of a WQMP to identify measures to minimize the adverse effects of urbanization on site hydrology, runoff flow rates and pollutant loads. • Preparation of a HMP to reduce adverse changes to the magnitude and frequency of stream flows and associated sediment load due to urbanization or other changes in the watershed land use and hydrology. <p>Similar measures may be required and implemented for any future development on the site as part of Alternatives 1 and 2, regardless of ownership.</p>
Biological Resources			
<p>Construction: Negligible to minor impacts to wildlife and habitat due to increase noise and surface runoff.</p>	<p>Construction and Operations: No impacts to biological resources during construction or operations.</p>	Negligible indirect impacts on biological resources due to land disturbance and noise during ongoing maintenance activities.	<p>The following measures would be implemented during construction of a new USCIS building for Alternative 1:</p> <ul style="list-style-type: none"> • Use of approved species for revegetation. • Avoidance of introduction of invasive species.

Hybrid/Lease Construction Alternative (Alternative 1)	Preferred Alternative - Lease Relocation (Alternative 2)	No Action Alternative	Impact Reduction Measures
<p>Operations: No impacts to biological resources.</p> <p>Future Redevelopment: Minor impacts to wildlife and habitat due to increase noise and surface runoff during construction, similar to construction of a new USCIS building. No impacts during operation.</p>	<p>Future Redevelopment: Similar to Alternative 1 Future Redevelopment, but to a greater intensity.</p>		<ul style="list-style-type: none"> • Surveys for migratory birds would be conducted if ground disturbance is conducted within the nesting seasons. If necessary, such surveys would be conducted no more than 10 days prior to vegetation removal for project activities that occur within California bird breeding season, which extends from February 1 through August 31. Surveys would be conducted at any buildings or structures proposed for construction or demolition and in any natural areas directly affected by project activities. Surveys would include the disturbance area and a 500-foot buffer around the disturbed area, as feasible. Any nests, with the exception of eagles' nests, identified on the premises during the pre-breeding season surveys would be removed, as long as no eggs are present. If a nest with eggs is found, activities in the disturbance area and buffer area would be halted until the eggs hatched and the young fledged. <p>Similar measures may be required and implemented for any future development on the site as part of Alternatives 1 and 2, regardless of ownership.</p>
Transportation and Traffic			
<p>Construction: Minor impacts during construction from increased construction vehicle traffic and impacts to pedestrian infrastructure near CHFB.</p> <p>Operations: Long term beneficial impacts near CHFB due to reductions in vehicle trips. Less than significant impacts from tenant relocation to newly leased spaces.¹</p> <p>Future Redevelopment: Minor impacts during construction, similar to construction of a new USCIS building. Minor to significant impacts during operations, depending on the density and composition of future redevelopment and changes to traffic</p>	<p>Construction: No impacts to traffic during lease build-outs.</p> <p>Operations: Less than significant impacts from tenant relocation to newly leased spaces.¹</p> <p>Future Redevelopment: Similar to Alternative 1 Future Redevelopment, but to a greater intensity</p>	<p>No impacts to transportation and traffic.</p>	<p>The following measures would be implemented for Alternative 1:</p> <ul style="list-style-type: none"> • Minimize construction vehicle movement during peak traffic hours; • Place construction staging areas where they would least interfere with local traffic and parking; • Minimize detours and impacts to pedestrians and bicyclists during construction activities, to include by providing appropriate information and signage to pedestrians and motorists who are traveling throughout the area; • Prepare a Traffic Management Plan to minimize traffic delays and maintain traffic safety during construction;

Hybrid/Lease Construction Alternative (Alternative 1)	Preferred Alternative - Lease Relocation (Alternative 2)	No Action Alternative	Impact Reduction Measures
<p>patterns and volume in the project area.</p>			<ul style="list-style-type: none"> • To the extent possible, provide appropriate connections to bike lanes located along Alicia Parkway, Avila Road, La Paz Road, and Aliso Creek Road; • Provide onsite bike storage at newly constructed facilities; • Provide designated areas/parking for freight and package delivery, and direct deliveries to the loading dock area; • Establish pick-up point service and/or automated parcel systems to allow for deliveries that can be made with one truck stop; • Develop and implement Transportation Demand Management strategies to reduce single occupancy vehicles and encourage walking, biking, using public transit, carpooling, flexible work schedules and telecommuting; • Implement traffic signal coordination on arterial streets were practical to maximize the efficiency of the intersections and roadway network; • Coordinate with local, state and federal transportation authorities when planning access to the CHFB site; and • Follow all local, state and federal planning guidelines and regulations when maintaining or upgrading roadway infrastructure. <p>Similar measures may be required and implemented for any future development on the site as part of Alternatives 1 and 2, regardless of ownership.</p>
Hazardous Waste and Materials			
<p>Construction: Negligible to minor impacts during construction activities due to use of hazardous materials and generation of hazardous waste.</p> <p>Operations: Negligible impacts due to use of hazardous materials on site.</p> <p>Future Redevelopment: Minor impacts during construction, similar to</p>	<p>Construction: Negligible to minor impacts due to hazardous materials usage and generation of hazardous waste during build-out of lease space, and vacating of CHFB.</p>	<p>Minor impacts due to ongoing use of hazardous materials and generation of hazardous waste, as well as generation of hazardous wastes during maintenance activities.</p>	<p>The following measures would be implemented during construction of a new USCIS building for Alternative 1:</p> <ul style="list-style-type: none"> • If PCB-containing materials are identified onsite, appropriate abatement actions for their disposal would be implemented in accordance with regulatory requirements, and soil beneath transformers would be evaluated for evidence of releases. If present in underlying soils, appropriate abatement actions for

Hybrid/Lease Construction Alternative (Alternative 1)	Preferred Alternative - Lease Relocation (Alternative 2)	No Action Alternative	Impact Reduction Measures
<p>construction of a USCIS building. Negligible impacts during operations, similar to operations of a new USCIS building.</p>	<p>Operations: Negligible impacts due to use of hazardous materials on site. Future Redevelopment: Similar to Alternative 1 Future Redevelopment, but to a greater intensity.</p>		<p>removal and disposal would be implemented in accordance with applicable regulatory requirements.</p> <ul style="list-style-type: none"> • All spills or releases of petroleum oil lubricating products, hazardous materials, pollutants or contaminants would be handled in accordance with measures outlined in a Spill Prevention and Response Plan prepared for the construction project. • A Soil Management Plan would be prepared to address the potential for encountering areas of potential environmental concern during associated grading, excavation or other subsurface disturbance. The Soil Management Plan would identify specific measures to address hazardous waste and materials cleanup efforts including monitoring, handling, stockpiling, characterization, on-site reuse, export and disposal protocols for excavated soil. • To prevent exposure to workers or the release of hazardous waste and materials to the environment, field surveys, soil sampling or laboratory testing would be conducted in any questionable areas prior to renovations, construction or demolition. These efforts would evaluate the potential occurrence of contaminants where known spills or contamination have occurred, followed by proper handling and disposal as necessary. • All potentially hazardous wastes generated would be properly characterized, segregated, and managed onsite prior to offsite disposal. <p>Similar measures would likely be required and implemented for any future development on the site as part of Alternatives 1 and 2, regardless of ownership. Any waste materials that contain, or are suspected to contain, asbestos or lead generated during future development activities would likely be characterized and managed as appropriate, including the use of containment and dust reduction measures as needed during deconstruction activities, and waste would likely be handled and disposed of in accordance with all applicable regulations. All other potentially hazardous wastes would likely be properly characterized, segregated, and managed onsite prior to offsite disposal.</p>

Hybrid/Lease Construction Alternative (Alternative 1)	Preferred Alternative - Lease Relocation (Alternative 2)	No Action Alternative	Impact Reduction Measures
Noise			
<p>Construction: Moderate impacts during construction from construction activities.</p> <p>Operations: Less than significant impacts from tenant relocation to newly leased spaces.¹</p> <p>Future Redevelopment: Moderate impacts during construction, similar to construction of a new USCIS building. Negligible impacts during operations, similar to operations of a new USCIS building.</p>	<p>Construction: Negligible impacts from office buildouts.</p> <p>Operations: Less than significant impacts from tenant relocation to newly leased spaces.¹</p> <p>Future Redevelopment: Similar to Alternative 1 Future Redevelopment, but to a greater intensity</p>	<p>Minor, short-term noise may occur as a result of ongoing maintenance of the building.</p>	<p>The following measures would be implemented during construction of a new USCIS building for Alternative 1:</p> <ul style="list-style-type: none"> • Implementation of noise control measures, such as project scheduling, noise barriers, and using noise controls on equipment (e.g., mufflers). • Conducting construction activities during normal business hours (i.e., between 7:00 a.m. and 8:00 p.m. Monday through Saturday, excluding holidays). If a variation from normal construction hours a variance permit from the City of Laguna Niguel would be obtained. • All construction activities would comply with the City of Laguna Niguel's noise ordinance. <p>Similar measures may be required and implemented for any future development on the site as part of Alternatives 1 and 2, regardless of ownership.</p>
Environmental Justice and Protection of Children's Safety			
<p>Construction: Minor impacts on environmental justice populations due to air, traffic, noise, construction impacts; minor to moderate impacts on children populations due to air and noise impacts.</p> <p>Operations: Minor to moderate impacts on environmental justice populations due to decreased economic activity in Laguna Niguel. No impacts to children populations.</p>	<p>Construction: No impacts during construction.</p> <p>Operations: Moderate impacts to environmental justice populations due to decreased economic activity in Laguna Niguel. No impacts to children populations.</p> <p>Future Redevelopment: Similar to Alternative 1 Future Redevelopment, but to a greater intensity.</p>	<p>No impacts to environmental justice or children populations.</p>	<p>Impact reduction measures for resources specific to environmental justice are discussed in the respective sections (i.e. Sections 3.3, Air Quality and Greenhouse Gases; Section 3.7, Visual Resources and Aesthetics; Section 3.10, Traffic and Transportation; and Section 3.12, Noise).</p>

Hybrid/Lease Construction Alternative (Alternative 1)	Preferred Alternative - Lease Relocation (Alternative 2)	No Action Alternative	Impact Reduction Measures
<p>Future Redevelopment: Negligible to moderate impacts during construction on environmental justice and children populations, similar to construction of a new USCIS building. Moderate impacts during operations to environmental justice and children populations, similar to construction of a new USCIS building.</p>			
Utilities and Infrastructure			
<p>Construction: Minor impacts due to increased water demand and wastewater generation during construction.</p> <p>Operations: Negligible beneficial impacts due to increased building efficiency and decreased utility needs.</p> <p>Future Redevelopment: Minor impacts during construction, similar to construction of a new USCIS building. Minor to moderate impacts during operations due to net increase in utility demands.</p>	<p>Construction: No impacts during construction.</p> <p>Operations: Beneficial impacts due to decreased utility demands from tenants occupying newer, more efficient buildings.</p> <p>Future Redevelopment: Similar to Alternative 1 Future Redevelopment, but to a greater intensity.</p>	<p>Ongoing demand for utilities during building operation, and increased need for maintenance as building systems continue to age.</p>	<p>The following measures would be implemented during construction of a new USCIS building for Alternative 1:</p> <ul style="list-style-type: none"> • Adherence to GSA P100 Standards including: <ul style="list-style-type: none"> ○ Newly-constructed buildings must not exceed the energy intensity of 30,978 British Thermal Units per square foot per year. ○ Toilets must be dual-flush or low-flow (1.28 gallons per flush), urinals must be High Efficiency Urinals (0.5 liters per flush), and lavatory faucets must be metered-type with 0.25 gallons per cycle. • Using native or locally-adapted species, xeriscaping, and/or grey water reusage to reduce water consumption. Any reuse of treated wastewater would comply with the water recycling criteria, permitted uses, and other applicable requirements in Title 22 of the California Code of Regulations. • Reviewing existing utility maps and contacting utility companies ahead of time to identify any locations where construction activities could potentially affect utility lines. • Coordinating with utility providers in advance of such activities to determine the best course of action to avoid or minimize impacts, either by implementing measures to protect utility lines or by arranging for their temporary or permanent relocation. <p>Similar measures regarding review of utility maps and coordination with utility providers during future development</p>

Hybrid/Lease Construction Alternative (Alternative 1)	Preferred Alternative - Lease Relocation (Alternative 2)	No Action Alternative	Impact Reduction Measures
			planning may occur as part of Alternatives 1 and 2; regardless of ownership.

1. Operational impact conclusions for this resource is based on the assumption the Proposed Action would not generate additional or greater impacts to the resource beyond those disclosed during CEQA approvals.

BMP = best management practice; CARB = California Air Resources Board; CHFB = Chet Holifield Federal Building; GSA = General Services Administration; HMP = Hydromodification Management Plan; NRHP = National Register of Historic Places; PCB = Polychlorinated biphenyls; SCAQMD = South Coast Air Quality Management District; WQMP = Hydromodification Management Plan; USCIS = United States Citizenship and Immigration Services; USEPA = U.S. Environmental Protection Agency

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ACRONYMS

Acronym	Definition
ACM	asbestos containing materials
ADA	Americans with Disabilities Act of 1990
AEA	Atomic Energy Act
APE	Area of potential effect
ASCE	American Society of Civil Engineers
ASHRAE	American Society of Heating, Refrigerating, and Air-Conditioning Engineers
ATFP	Anti-Terrorism Force Protection
BMPs	best management practices
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBP	Customs and Border Protection
CEQ	Council on Environmental Quality
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CH ₄	methane
CHFB	Chet Holifield Federal Building
CHRIS	California Historical Resources Information System
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO ₂	carbon dioxide
CSC	California Service Center
CUP	Central Utility Plant
CWA	Clean Water Act
dB	decibel
dBA	A-weighted decibel
DHS	Department of Homeland Security
DNL	Day-night Sound Level
DOE	Determination of Eligibility
DOJ	Department of Justice

Acronym	Definition
EHR	Exceptionally High Risk
EIS	Environmental Impact Statement
EO	Executive Order
ESA	Environmental Site Assessment
FASTA	Federal Assets Sale & Transfer Act of 2016
FHWA	Federal Highway Administration
GHG	greenhouse gas
GSA	General Services Administration
GWP	global warming potential
HMP	Hydromodification Management Plan
I-5	Interstate 5
ICE	Immigration and Customs Enforcement
INS	Immigration and Naturalization Service
ISC	Interagency Security Committee
LBP	lead-based paint
LEED®	Leadership in Energy and Environmental Design
LOS	Level of service
MBTA	Migratory Bird Treaty Act
MNWD	Moulton Niguel Water District
N ₂ O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NESHAP	National Emission Standards for Hazardous Air Pollutants
NFPA	National Fire Protection Association
NHPA	National Historic Preservation Act
NOA	Notice of Availability
NOI	Notice of Intent
NO ₂	nitrogen dioxide
NO _x	nitrogen oxide
NRHP	National Register of Historic Places
O ₃	ozone
OMB	Office of Management and Budget
OPM	Office of Personnel Management
OSHA	Occupational Safety and Health Administration

Acronym	Definition
Pb	lead
PBRB	Public Buildings Reform Board
PBS	Public Building Service
PCB	Polychlorinated biphenyls
PCPI	per capita personal income
PHE	Potomac-Hudson Engineering, Inc.
PM _{2.5}	particulate matter of diameter 2.5 microns or less
PM ₁₀	particulate matter of diameter 10 microns or less
ppm	parts per million
PSD	Prevention of Significant Deterioration
PV	photovoltaic
RCRA	Resource Conservation and Recovery Act
ROI	region of influence
SCAQMD	South Coast Air Quality Management District
SFRM	spray-on fire-resistive material
SHPO	State Historic Preservation Office
SIP	State Implementation Plan
SO ₂	sulfur dioxide
SPCC	Spill Prevention, Control, and Countermeasures
SR-73	State Route 73
SWPPP	Stormwater Pollution Prevention Plan
U.S.	United States
USC	United States Code
USCIS	United States Citizenship and Immigration Services
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
UST	underground storage tank
VMT	Vehicle miles traveled
VOCs	Volatile organic compounds
WQMP	Water Quality Management Plan

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CHAPTER 1 PURPOSE AND NEED FOR THE PROJECT

The Chet Holifield Federal Building (CHFB) is located in Laguna Niguel, California, between Los Angeles and San Diego, and approximately 4 miles from the Pacific Ocean coastline (see Figure 1-1). Construction of the CHFB was completed in 1971. The General Services Administration (GSA) proposes to remove existing tenants from the CHFB and relocate them to a newly constructed facility adjacent to the existing building or lease space in the Orange County market, and dispose of any excess property at the CHFB site. Future development of the CHFB site is not included as part of GSA's Proposed Action, but is considered as a reasonably foreseeable scenario as described in Chapter 2. The GSA has prepared this Environmental Impact Statement (EIS) in compliance with the National Environmental Policy Act (NEPA) of 1969 (42 United States Code [USC] 4321 *et seq.*), GSA Public Building Service (PBS) NEPA Desk Guide, and other relevant federal and state laws and regulations. This EIS discloses the direct, indirect, and cumulative environmental impacts that would result from the Proposed Action and alternatives.

1.1 INTRODUCTION

The CHFB is located on a 92-acre site and is the sole federally-owned facility in south Orange County, California. The property is located in a high value real estate suburban area comprised of retail and residential zones and is primarily used for federal office space. The CHFB has been determined eligible for listing on the National Register of Historic Places (NRHP).

The CHFB is approximately 1 million square feet in size and located on an 86.5-acre parcel, with a 5.5-acre central utility plant parcel north of Avila Road. The building was designed by William L. Pereira, a significant California architect recognized for his contribution to notable works such as the Los Angeles County Museum, the Transamerica Pyramid, and the Theme Building at Los Angeles International Airport. The building has six stories as well as a partial underground section and mechanical penthouse. The building is multi-tiered, with the largest floor area on the first floor and building floors continually reducing in size with each added level. A central utility plant is located across the street to the north from the original building main entrance. A loading dock is located on the north end of the building. Two guard stations are located on the property; one of which is no longer in use. Additional structures include a Services Support Building, fire pump house, cooling tower, and thermal energy storage tank. Amenities include a full-service cafeteria, health unit, credit union, fitness center, and a day care center located in separate facilities on the same site. See Figure 1-2 for a layout of existing site facilities.

The CHFB is owned by GSA and home to various federal agency tenants, with the United States Citizenship and Immigration Services (USCIS) serving as the largest tenant. The Homeland Security Act of 2002 (Public Law No. 107-296, 116 Stat. 2135) dismantled the former Immigration and Naturalization Service (INS) and separated it into three components within the Department of Homeland Security (DHS) in March of 2003. This includes the creation of the largest tenant at CHFB, USCIS, to enhance the security and improve the efficiency of national immigration services by exclusively focusing on the administration of benefit applications. Immigration and Customs Enforcement (ICE) and Customs and Border Protection (CBP) were established as sister agencies, handling immigration enforcement and border security functions, respectively.

As the agency responsible for lawful immigration to the United States (U.S.), USCIS provides services that include citizenship, immigration of family members, employment in the U.S., verification of authorized employment, humanitarian programs, adoptions, civic integration and genealogy. The USCIS California Service Center (CSC) is one of five Service Centers in the nation, along with the Vermont Service Center, the Texas Service Center, the Nebraska Service Center, and the Potomac Service Center. While much of the CSC includes aspects of typical office space, the CSC has a number of security requirements that are not easily accommodated in a standard office space.



Figure 1-1. Regional Location of the Chet Holifield Federal Building



Figure 1-2. Existing Chet Holifield Federal Building Site

In addition to USCIS, other CHFB tenant agency mission requirements include the following:

- **Customs and Border Protection** – Charged with safeguarding America's borders and protecting the public from dangerous people and materials while enhancing the Nation's global economic competitiveness by enabling legitimate trade and travel.
- **Immigration and Customs Enforcement** – Protects America from the cross-border crime and illegal immigration that threaten national security and public safety. This mission is executed through the enforcement of more than 400 federal statutes and a focus on smart immigration enforcement, preventing terrorism, and combating the illegal movement of people and goods.
- **ICE Office of Human Capital** – Provides strategic programs, client services and workforce relations support to ICE employees; and provides oversight and guidance to ICE's managers, ensuring compliance with human resources policies and practices.
- **Defense Contract Management Agency** – Provides contract administration services for the Department of Defense and other federal organizations and international partners, and is an essential part of the acquisition process from pre-award to sustainment.
- **GSA Federal Acquisition Service** – Delivers comprehensive products and services across the government at the best value possible. Services cover the following areas: products and services; technology; motor vehicle management; transportation; travel; and procurement and online acquisition tools.
- **GSA Office of Inspector General** – Responsible for promoting economy, efficiency, and effectiveness; and detecting and preventing fraud, waste, and mismanagement in GSA programs and operations. This is accomplished primarily by performing: independent financial, program, information technology, contract and compliance audits; criminal and civil investigations; reviews of proposed legislation and regulations; and by providing other services to senior GSA, Congressional, and law enforcement officials.
- **GSA Public Building Service** – Acquires space on behalf of the federal government through new construction and leasing, and acts as a caretaker for federal properties across the country.
- **Office of Personnel Management (OPM)** – Serves as the chief human resources agency and personnel policy manager for the federal government. OPM directs human resources and employee management services, administers retirement benefits, manages healthcare and insurance programs, oversees merit-based and inclusive hiring into the civil service, and provides a secure employment process.
- **International Group of Treasury Associations** – Serves as a forum for National Treasurers Associations to share views and information on issues that impact the treasury and finance profession and association management.
- **Internal Revenue Service** – Serves as the Nation's tax collection agency and administers the Internal Revenue Code enacted by Congress.
- **U.S. Army, Army Recruiting** – Provides recruiting services for the U.S. Army, reserves, and Army National Guard.
- **U.S. Army Corps of Engineers** – Provides engineering services to strengthen the Nation's security by building and maintaining America's infrastructure and military facilities.

1.2 PURPOSE AND NEED

1.2.1 Purpose of the Project

The purpose of the Proposed Action is to accommodate the long-term office space requirements for the current tenants located at the CHFEB that would meet applicable building, accessibility, and security standards. Furthermore, the purpose is to make such accommodations primarily within the Orange County, California market in a cost-effective manner that would not require substantial personnel relocations or majorly disrupt the federal tenants from achieving their agency mission. The Proposed Action would also dispose of any excess federal property within the 92-acre CHFEB site.

1.2.2 Need for the Project

The Proposed Action is needed because the current working space for the tenants does not meet GSA's current building, accessibility, and security standards. Other than some energy-related modifications, there have been no modification to the CHFEB since the 1980s. Most of the building's infrastructure is beyond its useful life and deficiencies have been documented in all major mechanical and electrical systems, including life-safety, fire protection, and fire sprinkler systems. Additionally, numerous issues exist, including the presence of asbestos containing materials (ACM) and the need to improve the building's response to future seismic events.

More specifically, the building does not meet the current standards outlined below:

- GSA Facilities Standards for the Public Buildings Service (P-100)
- American Society of Civil Engineers (ASCE)-31, Seismic Evaluation of Existing Buildings, and ASCE-41, Seismic Rehabilitation of Existing Buildings
- Several National Fire Protection Association (NFPA) Standards for Fire & Life Safety Requirements, (NFPA 1, NFPA 13, NFPA 70, NFPA 80, NFPA 92, NFPA 101, NFPA 105, NFPA 230, etc.)
- International Building Code 2015 and California Building Code 2016
- American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) 90, Energy Standard for Buildings
- Department of Justice's (DOJ) Americans with Disabilities Act of 1990 (ADA) 2010 Standards for Accessible Design
- Interagency Security Committee (ISC) Security Design Criteria

The CHFEB was originally designed for use as a light manufacturing facility and was never designed to function as an office building. Much of the lower three floors have limited or no windows. Floor plates as deep as 400 feet from any exterior glazing make it difficult for light to reach office space areas per GSA best practices related to building occupants. Most existing office space does not meet modern office standards as defined for federal agencies and there are limited options available to make the spaces compliant.

The property is in various states of disrepair and has multiple functionality issues, as detailed below:

- **Structure.** The building, to include windows and doors, exhibits signs of age and deterioration. Many existing pre-cast concrete panels exhibit cracking or missing joint sealant throughout all elevations of the building. Additionally, the painted surface exhibits fading and loss of protective qualities.

- **Hazardous Materials.** Previous reports have outlined and documented that the building contains hazardous materials. ACM has been identified within the building as described in Section 3.11, Hazardous Waste and Materials. Lead based paint applications have also been noted from previous reports (Jonas & Associates Inc. and Earth Tech, Inc. 2005).
- **Seismic Deficiencies.** There are a number of critical seismic upgrades recommended for the building (Degenkolb Structural Engineers 2006, 2017). The recommended upgrades are largely the result of the increased understanding of seismic design and the subsequent evolution of code over the last 48 years.
- **Building Code.** The building was completed in 1971 and was designed to meet building code requirements in place at that time. Currently, it does not meet various provisions of the most recent 2017 building code.
- **Accessibility.** The CHFB site has accessibility issues in both interior and exterior areas. The site does not include sufficient handicap and van parking on site. Exterior railing, stairs, and ramps exhibit deterioration from age and use, and sidewalk and curbs exhibit cracks and potentially dangerous tripping hazards. Pedestrian access points do not currently comply with accessibility requirements.
- **Parking.** The existing parking areas on all sides of the building have deteriorated due to age and wear. The condition of existing paving systems varies, with paving nearest the buildings in the best condition and paving at the outlying/little-used parking areas in the poorest condition. On-site roadways are damaged and require repair. Parking bollards throughout the site are loose and do not provide adequate protection against vehicular threats.

The site also features more acreage for parking than is required. The outer ring of lots and drives are essentially unused because they are in excess of the amount of parking typically needed for an office building and therefore are in an advanced stage of deterioration. The current parking design provides for poor circulation for both vehicles and pedestrians.

- **Landscaping.** The existing landscaping is in fair to poor condition. Trees along the perimeter of the parking areas are missing, and bare slopes and soil erosion are noticeable around the site.

The Proposed Action is also needed to address the Public Buildings Reform Board (PBRB) recommendations under P.L. 114-287, the Federal Assets Sale & Transfer Act of 2016 (FASTA) which made a recommendation of disposal of the CHFB (see Section 2.1.1.1 for additional information).

1.3 PUBLIC INVOLVEMENT

The NEPA process provides several opportunities for public involvement. During these times, interested and affected parties (stakeholders) may express their concerns and provide their views about:

- The project and its possible impacts on the natural and human environment;
- What should be addressed in the analysis and evaluation of the Proposed Action; and
- The adequacy of the NEPA analysis and documentation of potential impacts in the EIS.

Public participation with respect to decision-making on the Proposed Action is guided by GSA's implementing procedures for compliance with NEPA (GSA Order ADM 1095.1F, *Environmental Considerations in Decision Making*).

1.3.1 Scoping Phase

1.3.1.1 Notification of a Public Scoping Meeting

A Notice of Intent (NOI) for the EIS was published in the *Federal Register* on November 15, 2019. The NOI listed the end of the public scoping comment period as December 10, 2019; however, GSA accepted comments through December 17, 2019.

In advance of the NOI publication in the *Federal Register*, GSA published two advertisements in a local newspaper the weeks preceding the October 2, 2019 public scoping meeting. The advertisements indicated GSA's intent to prepare an EIS and conduct a scoping meeting; provided a brief description of the project; identified the public scoping meeting time and location; and included instructions to submit a comment. The advertisement was published in the Orange County Register on September 20 and 22, 2019.

1.3.1.2 Public Scoping Meeting

A public meeting was held on Wednesday, October 2, 2019 from 4 to 6 PM at the Laguna Niguel City Hall located at 30111 Crown Valley Pkwy, Laguna Niguel, California 92677. Forty people attended the meeting.

An open house format was used to encourage discussion and information sharing and to ensure that the public had opportunities to speak with representatives of the GSA. Informational posters about the proposed alternatives, project background, purpose and need, and ways for submitting scoping comments were provided at the meeting. Additional materials available at the public scoping meeting included a sign-in sheet, a comment form, and a handout.

1.3.1.3 Summary of Public Scoping Comments

The GSA invited written comments to be submitted via mail or email on the CHFB EIS. More specifically, the GSA invited comments on the key topics that should be covered in the EIS; examples of potential adverse and beneficial impacts from the Proposed Action; and any other relevant information. Comments were submitted using comment forms, letters, and emails.

A total of 8 unique commenters provided input during the scoping period. Commenters provided comment on a range of topics as shown in Table 1-1, with the majority of comments received concerning air quality, project alternatives, and water resources. A total of 29 comments were received.

Table 1-1. Commenters and Comments by Category

Category	Number of Commenters	Number of Comments
Alternatives	5	5
Cultural Resources	3	4
Air Quality	2	6
Transportation and Traffic	2	2
Water Resources	2	5
Biological Resources	1	3
Hazardous Materials	1	1
Public Involvement	2	2
Cumulative Effects	1	1

The CHFB EIS Final Scoping Report includes a more detailed description of comments as well as meeting materials from the Public Scoping Meeting (see Appendix A).

1.3.2 Draft EIS Phase

1.3.2.1 Notification of a Draft EIS Public Meeting

A Notice of Availability (NOA) was published in the *Federal Register* by GSA on July 8, 2020 issuing the Draft EIS. In addition, the USEPA published an additional notice in the *Federal Register* on July 17, 2020. The public was also notified of the CHFEB Draft EIS public meeting through multiple other channels of communication, including two newspaper ads, letters to interested parties, and social media posts. The NOA, newspaper ads, letter to interested parties, and social media posts are included in Appendix F.

1.3.2.2 Draft EIS Public Meeting

A virtual public meeting was held on Tuesday, August 4, 2020 from 4:00 p.m. to 6:00 p.m., Pacific Time.

A presentation on the Draft EIS was provided to the public, followed by a public comment session where the public had an opportunity to provide comments on the Draft EIS and ask questions of GSA staff. The presentation included information about the proposed alternatives, project background, purpose and need, and Section 106 process. A project handout was also made available. A copy of the presentation and the handout are included in Appendix F.

1.3.2.3 Draft EIS Public Comments and Responses

The comment period for the Draft EIS closed on September 4, 2020. The 40 comments received during the comment period were considered in preparation of this Final EIS. A summary of public comments received and GSA's responses are included in Appendix G of this Final EIS.

Several comments were provided regarding the potential indirect effect of demolition of the CHFEB by a future owner. There are numerous factors that may influence the future owner's willingness and ability to conduct such a demolition (or any future development of the CHFEB site), including but not limited to future economic conditions, tax incentives, support or opposition from the local community, applicable local land use regulations, and the existence of any deed restrictions. As described in Sections 2.1.1.2 and 2.1.2.1, the future owner's decision to demolish the building or redevelop the CHFEB site may be subject to NEPA and/or analysis under the California Environmental Quality Act (CEQA) at that time. With regard to any potential preservation deed restrictions that may be required as part of GSA's disposal action, the Section 106 consultation process discussed in Section 3.2, Cultural Resources is the exclusive avenue for determining whether, and if so, what type of deed restrictions would be required. Interested parties are invited to participate in the Section 106 process by contacting Jane Lehman at jane.lehman@gsa.gov or 415-522-3098.

CHAPTER 2 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

Per the Council on Environmental Quality (CEQ) regulations for implementing NEPA at 40 Code of Federal Regulations (CFR) 1502.14¹, the federal government must consider reasonable alternatives to a proposed action. Considering alternatives helps avoid unnecessary impacts and allows analysis of reasonable ways to achieve the stated purpose. To warrant detailed evaluation, an alternative must be reasonable. To be considered reasonable, an alternative must be ready for decision (any necessary preceding events must have taken place), affordable, capable of implementation, and must meet the purpose of and need for the action. Said otherwise, reasonable alternatives are practical or feasible from a common sense, technical and economic standpoint; and meet the project's purpose and need. The Proposed Action and reasonable alternatives are described in Sections 2.1 through 2.3. Alternatives considered but eliminated from further analysis are discussed briefly in Section 2.4.

2.1 PROPOSED ACTION AND ALTERNATIVES

The Proposed Action is defined as the relocation of tenants of the CHFEB to new office space that meets GSA's current building, accessibility, and security standards. A feasibility study was prepared for the project to explore viable alternatives to accommodate the CHFEB tenants. Two project alternatives are considered in this EIS that would meet the project purpose and need. These alternatives were considered by a multidisciplinary team, following a scoping meeting and consultation with the community. The alternatives described and evaluated in this Final EIS include an alternative to construct a new federal building for USCIS and relocate other tenants to leased office space in the region; an alternative in which all tenants relocate to leased office space; and the No Action Alternative. The Proposed Action also includes disposal of GSA property reported as excess (Section 2.1.1.1 highlights the disposal process for federal facilities). Future development of the CHFEB site is not included as part of GSA's Proposed Action, but is considered as a reasonably foreseeable scenario as described in Sections 2.1.1.2 and 2.1.2.1.

2.1.1 Hybrid Lease/Construction (Alternative 1)

The Hybrid Lease/Construction Alternative would include construction of a new federal building on a portion of the existing 92-acre site to house the USCIS (approximately 2,000 staff) while relocating all other tenants into existing Class A lease space within the region. The existing building would be vacated by current tenants and the remainder of the property not retained for construction of the new federal building (i.e., 64.85 acres) would be reported as excess in accordance with federal policy and disposed (see Section 2.1.1.1).

The new building concept would be approximately 380,000 square feet across four levels and would include a 1,517-space parking lot. Figure 2-1 includes a representative rendering of the new structure and parking. The overall footprint would encompass 27.15 acres of the existing property (see Figure 2-2).

¹ CEQ NEPA implementing regulations at 40 CFR Parts 1500 – 1508 were updated on July 16, 2020. Per 40 CFR 1506.13, the updated regulations apply to all NEPA processes begun after the effective date of September 14, 2020. As this EIS began prior to the effective date with publication of the Notice of Intent in the *Federal Register* on November 15, 2019, references throughout this EIS are to the old regulations at 40 CFR 1500 – 1508 updated prior to July 16, 2020.



Figure 2-1. Rendering of New USCIS Building

The new structure would also include special support functions including a day care facility, cafeteria, and loading dock. Guard booths would be constructed at entrances and exits to parking areas as well as the loading dock. The facility would be designed with appropriate Anti-Terrorism Force Protection (ATFP) measures for security, to include appropriate structure design (e.g., blast resistant windows, appropriate setbacks), facility entrance and interior security requirements, as well as surveillance system requirements.

All construction activities, including staging/laydown, would remain within the 27.15-acre parcel (see Figure 2-2). Construction activities would include utility tie-ins (potable water, wastewater, stormwater and electricity), erection of structures, and finishing work. Construction equipment would be typical of building construction, and would include trucks (cement and dump), backhoes, loaders, bulldozers, cranes, concrete equipment, and pavers. Construction would take approximately 30 months to complete. Peak construction could last for up to 15 months with a potential maximum of 300 construction workers and 90 to 100 trucks per day for deliveries and waste removal. During non-peak construction, between 15 to 35 workers would be onsite. All construction and demolition waste would be disposed and recycled at authorized facilities.

Excavation depth, foundation requirements, and other structural integrity requirements for new construction would be dependent on the results of the geotechnical investigation and engineering report to be prepared for the site per the requirements of P-100.

Construction would involve temporary road and pedestrian sidewalk closures. Road closures would be periodic and temporary during the construction period. Pedestrian sidewalks along the perimeter of the CHFB site would be closed during the duration of construction. Pedestrians would be directed to utilize the sidewalks on the other side of the street.

At a minimum, GSA requires that new construction of its facilities obtain a Leadership in Energy and Environmental Design (LEED®) Gold certification. However, the GSA aims to obtain a Platinum certification – the highest LEED® certification – at all of its facilities. Technologically sound and proven methods would be implemented to meet the applicable energy and sustainability requirements of the LEED® certification process and to minimize energy use, water use, and waste generation. Energy conservation measures could include daylighting (i.e., using daylight to provide internal lighting); solar orientation (i.e., positioning a building to take advantage of heating and lighting from the sun); and installing more efficient insulation. Water conservation measures could include use of water efficient and native/adaptive landscaping; use of low-flow fixtures; or implementation of water reuse, capture, and treatment strategies. Stormwater infrastructure (e.g., bioswales) would be included in the site design to manage runoff to at least the 95th percentile of regional/local rainfall events on site. Waste management measures could include waste diversion requirements during construction and use of sustainable building materials.



Figure 2-2. Proposed Alternative 1 Site Layout

The balance of federal agencies would be relocated to existing Class A leased space primarily within Orange County. Tenants would be relocated based on expressed delineated geographic areas within which the agency has indicated it would like to operate. Agencies have primarily indicated a desire to remain in south Orange County but have also expressed willingness to relocate to areas such as Irvine, Santa Ana, Anaheim or other central or northern portions of the County. In some instances, tenants have expressed willingness to relocate as far as Long Beach in Los Angeles County. The exact location of new leased office space is not currently known; however, it is anticipated at least 55 percent of the remaining tenants would relocate in south or central Orange County no farther north than Irvine, with as many as 45 percent of the remaining tenants relocating to areas north of Irvine such as Santa Ana, Anaheim, or Long Beach. A breakdown of tenants requiring relocation from the current CHF B site is provided in Table 2-1. It is assumed all leased locations would have sufficient parking space to accommodate future tenants. Similarly, it is assumed that operations of leased office spaces has been previously considered under state-level environmental review under CEQA prior to the construction of these facilities. To the extent practicable, impacts from GSA’s leasing action are also summarized in this document.

Table 2-1. Tenants Requiring Relocation from CHF B Site under Alternative 1

Agency	Personnel	
	Existing Conditions	Relocated
Customs and Border Protection	91	91
ICE	360	360
ICE Office of Human Capital	70	70
U.S. Citizenship and Immigration Services	2,001	0
Department of Defense – Defense Contract Management Agency	–	–
GSA, Federal Acquisition Service	–	–
GSA Office of Inspector General	4	4
GSA Public Building Service	20	20
Office of Personnel Management	5	5
Treasury Department, International Group of Treasury Associations	19	19
Treasury Department, Internal Revenue Service	470	470
U.S. Army – Army Recruiting	–	–
U.S. Army Corps of Engineers	–	–
TOTAL	3,040	1,039

GSA = General Services Administration, ICE = Immigration, Customs, and Enforcement, U.S. = United States

2.1.1.1 Disposal Process

In the traditional federal disposal process, once a federal agency determines a property to be excess, the property must first be offered to other federal agencies that may have a need for it. If there is no further need for the property within the federal government, it is considered surplus property. The property is next evaluated by the Department of Housing and Urban Development to determine if it is suitable for homeless use, as required under the McKinney-Vento Act. If it is deemed unsuitable, it may be screened for potential Public Benefit Conveyances or negotiated sale to a local municipality. Examples of a Public Benefit Conveyance include public health or educational uses, public recreational areas, or wildlife conservation, among others. If there is no homeless interest or no successful homeless or other Public Benefit Conveyances/negotiated sale application for the property, the property can proceed to public sale. This process is depicted graphically in Figure 2-3.



Figure 2-3. Traditional Federal Disposal Process

However, in 2016, Congress created the PBRB under P.L. 114-287 (FASTA), as an independent federal agency to manage property sales, consolidations, and redevelopment; reduce operating and maintenance costs and reliance on leased space; and maximize utilization of space across the federal government. The Board's mission has two major elements: (1) identify specific federal real property for disposal and reform, the federal real property practices in order to "obtain the highest and best value for the taxpayer" and (2) "facilitat[e] and expedit[e] the sale or disposal of unneeded federal civilian real properties". Recommendations must be approved by the Office of Management and Budget (OMB). FASTA then requires the federal agencies holding title to the properties to submit a Report of Excess to GSA within 60 days. Once GSA accepts the Report of Excess, GSA has 120 days to initiate the sales process and 1 year to complete the sale, which can be extended an additional year with OMB approval. Finally, to ensure flexibility in relocating existing federal employees, FASTA allows a 3-year leaseback after sale. Effectively, this process serves to expedite the Federal Disposal Process. On October 31, 2019, the PBRB made a recommendation of disposal on 12 federal properties, including the CHFB (PBRB 2019), and the recommendation was approved by the OMB on January 26, 2020. Disposal of the CHFB is currently planned to be made pursuant to the FASTA and PBRB recommendations.

2.1.1.2 Future Development of the Existing Parcel

Any future use of the CHFB following disposal is not a part of GSA's Proposed Action; however, considering the large size and desirable location of the parcel, it is foreseeable that some level of redevelopment or reuse of the site is likely to occur following disposal. Therefore, a range of potential future reuse scenarios of the site are considered in this analysis as indirect impacts (see Section 3.1.1).

If the property does not remain in federal ownership, future use of the portion of the site that is disposed (i.e., 64.85 acres) would be dictated by the new owner and the City of Laguna Niguel rezoning process (as applicable). Because a developer is not known at this time, no detailed plan exists for redevelopment of the property. This includes unknown density and composition of future commercial, residential, or mixed-use development which could occur. However, before redeveloping the 64.85 acre-parcel, it is possible that two

scenarios could apply. If the property remained in federal ownership, the appropriate level of NEPA analysis may be required by a future federal proponent. If the property is transferred out of federal ownership, the City of Laguna Niguel may require the new owner to complete the appropriate level of CEQA documentation, and obtain certain land use approvals for any proposed development or reuse. As part of the CEQA process, the City would identify the environmentally superior alternative, and the developer would have to adhere to measures to mitigate adverse impacts. Potential future development requirements are discussed in Chapter 3 for each resource, as applicable, for informational purposes; however, the GSA is not subject to these requirements nor are these requirements commitments of GSA. A project may not be approved as submitted under CEQA if mitigation measures are not able to substantially lessen any significant environmental effects associated with the project.

As there are currently no future plans for the future use of the site nor is future use a part of GSA's action, a range of general potential future development scenarios are considered in this analysis, based on potential anticipated future uses of the site and present judgement of GSA at the time of this EIS:

- **Renovation of the existing CHFB.** The new owner would conduct repairs and alterations to address known deficiencies in the existing building, including those to address code compliance, security and seismic safety in the building; ACM abatement throughout the building; conducting updates to the fire suppression and fire alarm systems along with modifications to fire life-safety exiting pathways in the building; and removal of accessibility barriers throughout the building and on the site which are required by federal law. It is assumed building occupancy would remain similar to current conditions of approximately 3,000 personnel.
- **Demolition of the existing CHFB and construction of new mixed-use space.** The new owner would demolish the existing CHFB and construct a new development in accordance with the City of Laguna Niguel rezoning process (as applicable). New development could include a mix of commercial and residential development, with appropriate parking and support facilities. Demolition of the existing CHFB could require up to 44,000 haul trips over an approximate 36-month period, or approximately 60 haul trips per day. Up to 300 workers would be on site during the demolition.

Potential future use scenarios are ultimately dependent on the future developer and not GSA, and are subject to change.

GSA's planning with respect to compliance with historic preservation requirements, and how that may affect future development at the site, is being handled through the Section 106 process (see Section 3.2, Cultural Resources).

2.1.2 Preferred Alternative - Lease Relocation (Alternative 2)

The Preferred Alternative would include relocation of all tenants to Class A lease space primarily within Orange County, similar to as described under Alternative 1, but to also include a new location for USCIS outside of the existing CHFB site. The entire CHFB site would be reported as excess in accordance with federal policy. Leasing would begin approximately in 2022.

All tenants, with the exception of USCIS, would be relocated based on the expressed delineated geographic areas within which the agency has indicated it would like to operate, as described in Section 2.1.1. The relocation of USCIS provides limited options within the County given the number of tenants (approximately 2,000 personnel) needed to be relocated and the specific security requirements for agency office space. It is assumed that USCIS would be relocated within Orange County, but to Irvine, Santa Ana, or Anaheim, where greater office space availability exists.

Relocation of all tenants may require build out of special use spaces to meet tenant agency mission needs (e.g., evidence rooms, law enforcement, laboratories, warehouse storage); however, these spaces would be accommodated in existing commercial space and would not require new land disturbance. Similar to

Alternative 1, it is assumed leased locations have sufficient parking space to accommodate future tenants. It is also assumed that operations of leased office spaces has been previously considered under state-level environmental review under CEQA, and impacts from GSA's leasing action are summarized in this document to the extent practicable.

2.1.2.1 Future Development of the Existing Parcel

Future development of the existing parcel under the Preferred Alternative would be similar to as described for Alternative 1, but for development of the entire 92-acre site as shown in Figure 1-2. Similar to Alternative 1, the density and composition of future commercial, residential, or mixed-use development are unknown as there are currently no future plans for the future use of the site nor is future use a part of GSA's action. It is assumed the City of Laguna Niguel would likely require the future owner to complete the appropriate level of NEPA or CEQA documentation and obtain necessary land use approvals for any proposed development.

Differences from the Alternative 1 scenario include:

- **Renovation of the existing CHF B and new construction.** The new owner would conduct repairs and alterations to address known deficiencies in the existing building similar to as described for Alternative 1. In addition, development could occur on underutilized portions of the 92-acre site, particularly on the south or western end of the site. Development could include commercial, residential, office space, or a mix of land uses.
- **Demolition of the existing CHF B and new construction.** The new owner would demolish the existing CHF B and construct a new mixed-use development similar to as described for Alternative 1, but for the entire 92-acre site.

Similar to Alternative 1, potential future use scenarios are ultimately dependent on the future developer and not GSA, and are subject to change. Furthermore, GSA's planning with respect to compliance with historic preservation requirements, and how that may affect future development at the site, is being handled through the Section 106 process (see Section 3.2, Cultural Resources).

2.2 NO ACTION ALTERNATIVE

The No Action Alternative is included and analyzed to provide a baseline for comparison with impacts from the project and to also satisfy federal requirements for analyzing "no action" under NEPA (40 CFR 1502.14(d)). The No Action Alternative assumes that tenants would remain within the existing CHF B and no new construction or relocation would occur. Minor repairs would occur as needed and maintenance and operation of the existing facilities would continue. This alternative would not meet the purpose and need of the project (see Section 1.2) as tenants would continue to occupy office space that does not meet applicable building, accessibility, and security standards.

2.3 COMPARISON OF ALTERNATIVES

Table 2-2 compares the potential environmental impacts resulting from the alternatives. Potential impacts are summarized for each resource area affected by the alternatives. Chapter 3 of this EIS contains a detailed discussion of these potential impacts by resource area.

Table 2-2. Summary Comparison of Alternatives

Hybrid/Lease Construction Alternative (Alternative 1)	Preferred Alternative - Lease Relocation (Alternative 2)	No Action Alternative
Cultural Resources		
<p>Construction: Potential for an effect to historic properties from ground disturbing activities in areas unsurveyed for archaeological resources.</p> <p>Operations: Moderate permanent adverse effects on an NRHP-eligible historic property (i.e., the CHFB) from partial demolition of the landscaping and site plan, and from visual impacts related to the loss of views to and from the historic property. Disposal of the property out of federal ownership could result in an effect to historic properties under NHPA and significant impacts under NEPA. The Section 106 process is currently underway to determine effects to the property under NHPA, and results of this process, as well as any required mitigation measures, will be detailed in the ROD for this EIS.</p> <p>Future Redevelopment: Future development would be subject to the outcome of the Section 106 process that is currently underway, the results of which will be documented in the ROD for this EIS. Future development at the site could result in an effect to archaeological resources, and visual impacts related to the loss of views to and from the historic property under a renovation scenario.</p>	<p>Construction: No impacts to cultural resources.</p> <p>Operations: Disposal of the property out of federal ownership could result in an effect to historic properties from future development. The Section 106 process is currently underway to determine effects to the property under NHPA, and results of this process, as well as any required mitigation measures, will be detailed in the ROD for this EIS.</p> <p>Future Redevelopment: Similar to Alternative 1 Future Redevelopment.</p>	<p>No impacts to cultural resources.</p>
Air Quality and Greenhouse Gas Emissions		
<p>Construction: Minor impacts during construction of new building from use of equipment, vehicles, and earth moving. Emissions would not exceed <i>de minimis</i> thresholds for any criteria pollutants. Negligible increases in GHGs.</p> <p>Operation: Negligible to minor impacts during operations due to emissions generated from building electricity and heating uses at new USCIS building. Less than significant impacts from tenant relocation to newly leased spaces.¹</p> <p>Future Redevelopment: Minor to moderate indirect impacts from construction activities, similar to construction of a USCIS building. Minor to moderate impacts during operations due to long term increases in vehicle trips to the current CHFB site.</p>	<p>Construction: Negligible impacts from emissions generated during build-outs for lease space.</p> <p>Operations: Less than significant impacts from tenant relocation to newly leased spaces.¹</p> <p>Future Redevelopment: Similar to Alternative 1 Future Redevelopment, but to a greater intensity.</p>	<p>Minor impacts from ongoing vehicle trips to site and periodic generator maintenance.</p>

Hybrid/Lease Construction Alternative (Alternative 1)	Preferred Alternative - Lease Relocation (Alternative 2)	No Action Alternative
Socioeconomics		
<p>Construction: Moderate impacts to recreational facilities from closure of El Lazo Basketball Courts. Minor beneficial impacts during construction from increased jobs and spending.</p> <p>Operations: Moderate impacts to the local economy in Laguna Niguel due to shift of approximately 1,000 workers to new leased locations in the County. Long term beneficial impacts due to increased tax revenue following land transfer.</p> <p>Future Redevelopment: Minor beneficial impacts during construction; similar to construction of a USCIS building. Moderate to significant impacts during operations from increased population in Laguna Niguel, strain on housing stock and community services. Moderate, long-term beneficial impacts from increased spending and tax revenue.</p>	<p>Construction: Moderate impacts to recreational facilities from closure of El Lazo Basketball Courts. Negligible to minor beneficial impacts during construction from increased jobs and spending.</p> <p>Operations: Moderate to significant impacts to local economy in Laguna Niguel due to the shift of approximately 3,000 workers to new leased locations in the County. Long term beneficial impacts due to increased tax revenue following land transfer.</p> <p>Future Redevelopment: Similar to Alternative 1 Future Redevelopment, but to a greater intensity.</p>	<p>Beneficial impacts of federal workforce remaining at CHFB in Laguna Niguel.</p>
Geology, Seismicity, and Soils		
<p>Construction: Negligible impacts on geology and topography; minor impacts to soils from land disturbance; beneficial impacts to seismicity due to decreased risk of seismic hazards to building tenants.</p> <p>Operations: No impacts to geology, topography, or seismicity. Negligible impacts to soils due to increased impervious surfaces and runoff.</p> <p>Future Redevelopment: Minor to moderate impacts to soils, geology, and topography during construction due to excavation and earth work activities. During operations, no impacts geology, topography, or seismicity. Minor impacts to soils due to increased impervious surfaces and runoff.</p>	<p>Construction and Operations: No impacts to geology, seismicity, topography, or soils during construction or operations.</p> <p>Future Redevelopment: Similar to Alternative 1 Future Redevelopment, but to a greater intensity.</p>	<p>No short- or long-term impacts to geology or topography would be expected. Negligible impacts to soils could occur due to land disturbance and soil erosion from ongoing maintenance activities. Impacts to the building from seismic disturbance might occur, as it is not currently constructed to California Building Code for seismic safety.</p>
Land Use		
<p>Construction: Minor impacts to adjacent land uses from construction activities from dust, traffic, noise, and road closures.</p> <p>Operations: No impacts to land use.</p> <p>Future Redevelopment: Negligible impacts during construction, similar to construction of a USCIS building. If the remaining parcel is transferred out of federal ownership, rezoning may be required.</p>	<p>Construction and Operations: No impacts to land use during construction or operations.</p> <p>Future Redevelopment: Similar to Alternative 1 Future Redevelopment, but to a greater intensity.</p>	<p>No impacts to land use.</p>

Hybrid/Lease Construction Alternative (Alternative 1)	Preferred Alternative - Lease Relocation (Alternative 2)	No Action Alternative
Visual Resources and Aesthetics		
<p>Construction: Minor impacts from construction activities introduced into the visual landscape.</p> <p>Operations: Minor to moderate impacts from introduction of new building into viewshed.</p> <p>Future Redevelopment: Minor impacts from construction activities, similar to construction of a new USCIS building. Moderate to significant impacts during operations from permanent alteration to the landscape with potential demolition of CHFB.</p>	<p>Construction and Operations: No impacts to visual resources during construction or operation.</p> <p>Future Redevelopment: Similar to Alternative 1 Future Redevelopment, but to a greater intensity.</p>	<p>No impacts to visual resources.</p>
Water Resources		
<p>Construction: Minor impacts to surface waters and wetlands from runoff; and disturbance of groundwater during excavation. Site is located outside of the 100-year floodplain.</p> <p>Operations: Minor impacts due to potential long-term increases in stormwater runoff and decreases in groundwater recharge.</p> <p>Future Redevelopment: Minor impacts to surface waters, wetlands, and groundwater during construction, similar to construction of a new USCIS building. Minor impacts to surface waters and groundwater during operations, similar to operations of a new USCIS building.</p>	<p>Construction and Operations: No impacts to water resources during construction or operations.</p> <p>Future Redevelopment: Similar to Alternative 1 Future Redevelopment, but to a greater intensity.</p>	<p>Negligible impacts to surface waters due to runoff during ongoing maintenance activities.</p>
Biological Resources		
<p>Construction: Negligible to minor impacts to wildlife and habitat due to increase noise and surface runoff.</p> <p>Operations: No impacts to biological resources.</p> <p>Future Redevelopment: Minor impacts to wildlife and habitat due to increase noise and surface runoff during construction, similar to construction of a new USCIS building. No impacts during operation.</p>	<p>Construction and Operations: No impacts to biological resources during construction or operations.</p> <p>Future Redevelopment: Similar to Alternative 1 Future Redevelopment, but to a greater intensity.</p>	<p>Negligible indirect impacts on biological resources due to land disturbance and noise during ongoing maintenance activities.</p>

Hybrid/Lease Construction Alternative (Alternative 1)	Preferred Alternative - Lease Relocation (Alternative 2)	No Action Alternative
Transportation and Traffic		
<p>Construction: Minor impacts during construction from increased construction vehicle traffic and impacts to pedestrian infrastructure near CHFB.</p> <p>Operations: Long term beneficial impacts near CHFB due to reductions in vehicle trips. Less than significant impacts from tenant relocation to newly leased spaces.¹</p> <p>Future Redevelopment: Minor impacts during construction, similar to construction of a new USCIS building. Minor to significant impacts during operations, depending on the density and composition of future redevelopment and changes to traffic patterns and volume in the project area.</p>	<p>Construction: No impacts to traffic during lease buildouts.</p> <p>Operations: Less than significant impacts from tenant relocation to newly leased spaces.¹</p> <p>Future Redevelopment: Similar to Alternative 1 Future Redevelopment, but to a greater intensity</p>	<p>No impacts to transportation and traffic.</p>
Hazardous Waste and Materials		
<p>Construction: Negligible to minor impacts during construction activities due to use of hazardous materials and generation of hazardous waste.</p> <p>Operations: Negligible impacts due to use of hazardous materials on site.</p> <p>Future Redevelopment: Minor impacts during construction, similar to construction of a USCIS building. Negligible impacts during operations, similar to operations of a new USCIS building.</p>	<p>Construction: Negligible to minor impacts due to hazardous materials usage and generation of hazardous waste during build-out of lease space, and vacating of CHFB.</p> <p>Operations: Negligible impacts due to use of hazardous materials on site.</p> <p>Future Redevelopment: Similar to Alternative 1 Future Redevelopment, but to a greater intensity.</p>	<p>Minor impacts due to ongoing use of hazardous materials and generation of hazardous waste, as well as generation of hazardous wastes during maintenance activities.</p>
Noise		
<p>Construction: Moderate impacts during construction from construction activities.</p> <p>Operations: Less than significant impacts from tenant relocation to newly leased spaces.¹</p> <p>Future Redevelopment: Moderate impacts during construction, similar to construction of a new USCIS building. Negligible impacts during operations, similar to operations of a new USCIS building.</p>	<p>Construction: Negligible impacts from office buildouts.</p> <p>Operations: Less than significant impacts from tenant relocation to newly leased spaces.¹</p> <p>Future Redevelopment: Similar to Alternative 1 Future Redevelopment, but to a greater intensity</p>	<p>Minor, short-term noise may occur as a result of ongoing maintenance of the building.</p>

Hybrid/Lease Construction Alternative (Alternative 1)	Preferred Alternative - Lease Relocation (Alternative 2)	No Action Alternative
Environmental Justice and Protection of Children’s Safety		
<p>Construction: Minor impacts on environmental justice populations due to air, traffic, noise, construction impacts; minor to moderate impacts on children populations due to air and noise impacts.</p> <p>Operations: Minor to moderate impacts on environmental justice populations due to decreased economic activity in Laguna Niguel. No impacts to children populations.</p> <p>Future Redevelopment: Negligible to moderate impacts during construction on environmental justice and children populations, similar to construction of a new USCIS building. Moderate impacts during operations to environmental justice and children populations, similar to construction of a new USCIS building.</p>	<p>Construction: No impacts during construction.</p> <p>Operations: Moderate impacts to environmental justice populations due to decreased economic activity in Laguna Niguel. No impacts to children populations.</p> <p>Future Redevelopment: Similar to Alternative 1 Future Redevelopment, but to a greater intensity.</p>	<p>No impacts to environmental justice or children populations.</p>
Utilities and Infrastructure		
<p>Construction: Minor impacts due to increased water demand and wastewater generation during construction.</p> <p>Operations: Negligible beneficial impacts due to increased building efficiency and decreased utility needs.</p> <p>Future Redevelopment: Minor impacts during construction, similar to construction of a new USCIS building. Minor to moderate impacts during operations due to net increase in utility demands.</p>	<p>Construction: No impacts during construction.</p> <p>Operations: Beneficial impacts due to decreased utility demands from tenants occupying newer, more efficient buildings.</p> <p>Future Redevelopment: Similar to Alternative 1 Future Redevelopment, but to a greater intensity.</p>	<p>Ongoing demand for utilities during building operation, and increased need for maintenance as building systems continue to age.</p>

1. Operational impact conclusions for this resource is based on the assumption the Proposed Action would not generate additional or greater impacts to the resource beyond those disclosed during CEQA approvals.

BMP = best management practice; CARB = California Air Resources Board; CHFB = Chet Holifield Federal Building; GSA = General Services Administration; HMP = Hydromodification Management Plan; NRHP = National Register of Historic Places; PCB = Polychlorinated biphenyls; SCAQMD = South Coast Air Quality Management District; WQMP = Hydromodification Management Plan; USCIS = United States Citizenship and Immigration Services; USEPA = U.S. Environmental Protection Agency

2.4 ALTERNATIVES CONSIDERED AND DISMISSED FROM DETAILED ANALYSIS

NEPA requires GSA to assess a range of reasonable alternatives to the Proposed Action. Several alternatives were assessed to determine whether they were feasible and whether they would meet the project's purpose and need.

2.4.1 Repair and Alterations

This alternative would include renovations required to eliminate seismic deficiencies; remediate and clean all surfaces of ACM; replace or modernize portions of the existing mechanical, electrical and plumbing systems that have come to the end of their functional life or are identified code deficiencies; make repairs and modernizations to code-required life safety systems and provide Architectural Barriers Act Accessibility Standards-based remodels throughout the building to eliminate any existing code-identified barriers. Tenants would continue to occupy portions of the CHFEB during renovations, and, as a result of its many phases of construction, this alternative would require approximately 9 years to implement. As such, this alternative would be disruptive to operations and affect each agency's ability to meet their mission objectives. In addition, when finished, the building would still retain the industrial infrastructure of a manufacturing facility that has been converted into office space. Given the large size of the existing floor plates, a renovated CHFEB would still not meet all the current construction guidelines for federal tenant agencies, and securing additional tenants for current and future vacant spaces would continue to be extremely difficult. Therefore, this alternative has been dismissed from further consideration.

2.4.2 Reduction, Repair, and Alteration (New Entry Focus)

This alternative would include removal of approximately 266,600 square feet of the basement and half of the first floor, reconfiguration of the building entryway to conform to GSA entryway standards, and a full upgrade of the entire building to meet GSA's current new construction standards similar to as described in Section 2.4.1. Tenants would continue to occupy portions of the CHFEB during renovations, and, as a result of its many phases of construction, this alternative would require approximately 9 years to implement. As such, this alternative would be disruptive to operations and affect each agency's ability to meet their mission objectives. Additionally, this alternative would be cost prohibitive compared to other alternatives considered; therefore, it has been dismissed from further consideration.

2.4.3 Reduction, Repair, and Alteration (New Courtyard Focus)

This alternative is similar to the New Entry Focus alternative in terms of upgrading the existing building and creating a new entrance. Approximately 121,320 square feet of area would be removed from the first three floors to create light wells and courtyards in lieu of removing the basement and first floor areas as was considered under the New Entry Focus alternative. Tenants would continue to occupy portions of the CHFEB during renovations, and, as a result of its many phases of construction, this alternative would require approximately 9 years to implement. As such, this alternative would be disruptive to operations and affect each agency's ability to meet their mission objectives. Additionally, this alternative would be cost prohibitive compared to other alternatives considered; therefore, it has been dismissed from further consideration.

2.4.4 New Construction for All Tenants

This alternative would include new construction to replace the entire building program for each agency on the existing CHFEB site, to include a new parking structure, with remaining space and existing CHFEB being reported as excess in accordance with federal policy. This alternative was determined not viable due to excessively high upfront capital costs that prohibited funding in the current budget environment; therefore, this alternative has been dismissed from current consideration.

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CHAPTER 3 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

Chapter 3 describes the current environment for resource areas that may be affected by the Hybrid Lease/Construction Alternative (Alternative 1) and the Preferred Alternative - Lease Relocation (Alternative 2), and the potential environmental consequences associated with each alternative. Resource areas analyzed include cultural resources; air quality and greenhouse gas emissions; socioeconomics; geology, seismicity, and soils; land use; visual resources and aesthetics; water resources; biological resources; transportation and traffic; hazardous waste and materials; noise; environmental justice and protection of children's health and safety; and utilities and infrastructure.

3.1 METHODOLOGIES

3.1.1 Affected Environment Methodology

The affected environment summarizes the current physical, biological, social, and economic environments of the area within and surrounding the CHFB 92-acre property and provides a regional description of resources, as applicable, to provide a baseline for potential off-site effects from tenant relocations within the region. As such, the discussion of each resource area within this chapter includes justification for the area for analysis (discussion of site-specific versus regional baseline conditions) that could be impacted by the Hybrid Lease/Construction Alternative and Lease Relocation Alternative.

3.1.2 Environmental Consequences Methodology

The impacts analysis considers effects to a resource for each alternative and describes the types of impacts that would occur (see Section 3.1.2.1) and assigns a significance criteria (see Section 3.1.2.2).

3.1.2.1 *Types of Impacts*

The terms "impacts" and "effects" are used interchangeably in this chapter. According to the CEQ NEPA Regulations at 40 CFR 1500-1508, direct and indirect effects are defined as:

- **Direct effects:** Effects that are caused by the action and occur at the same time and place (1508.8(a)).

Indirect effects: Effects that are caused by the action and are later in time or farther removed in distance but are still reasonably foreseeable. Indirect effects also include "induced changes" in the human and natural environments (1508.8(b)).

Indirect impacts may also be caused by another action or actions that have an established relationship or connection to the project (connected actions). These actions are those that would not or could not occur unless the Proposed Action were implemented. These actions are often referred to as "but for" actions and generally occur at a later time or at some distance removed from the original action (FHWA, Caltrans, and USEPA 2006). For example, the Proposed Action does not involve any renovation or demolition of the existing CHFB or additional construction on the site beyond construction of a new USCIS building. Under the Proposed Action, some or all of the CHFB site would be reported as excess in accordance with federal policy and disposed, and no details on future development of the parcel exist. However, it is "reasonably foreseeable" that some form of office use, commercial, or mixed-used development could remain on site, and that potential renovation or demolition, construction, and operation of a new development could occur on the parcel, pending the outcome of the Section 106 consultation process. Therefore, impacts from demolition, construction, and operation of future redevelopment are analyzed as indirect impacts of the Proposed Action Alternatives.

Identified impacts may be either adverse or beneficial. For the CHFEB EIS, the following definitions have been used by NEPA analysts:

- **Adverse impacts:** Those impacts which, in the judgment of an expert resource area analyst, are regarded by the general population as having a negative and harmful effect on the analyzed resource area.
- **Beneficial impacts:** Those impacts which, in the judgment of an expert resource area analyst, are regarded by the general population as having a positive and supportive effect on the analyzed resource area.

3.1.2.2 Significance Criteria

Criteria were defined as a means of measuring the size of the impact and its significance. The significance of impacts was determined systematically by assessing the magnitude (how much) and duration (how long) of an impact. Table 3.1-1 summarizes how each parameter is categorized. Significance thresholds are further defined for each resource within the respective sections.

Table 3.1-1. Summary of Environmental Impact Parameters

Magnitude	
Significant	Substantial impact or change in a resource area that is easily defined, noticeable and measurable, or exceeds a standard.
Moderate	Noticeable change in a resource area occurs, but the integrity of the resource area remains intact.
Minor	Change in a resource area occurs, but no substantial resource area impact results.
Negligible	The impact is at the lowest levels of detection – barely measurable but with perceptible consequences.
None	The impact is below the threshold of detection with no perceptible consequences.
Duration	
Permanent	Impact would last indefinitely.
Long-term	Impact would likely last the lifetime of the project, or for as long as any new construction is in operation.
Short-term	Impact would last the duration of the construction phase.
Temporary	Impact would be continuous and last for a portion of the construction phase.
Intermittent	Impact would not be constant or continuous but rather recurring or periodic. Intermittent impacts could occur temporarily or in the short or long-term.

3.2 CULTURAL RESOURCES

This section describes the cultural resources associated with the CHFEB site and potential effects on cultural resources from each of the alternatives. The discussion describes the regulatory framework, along with existing cultural resources throughout the vicinity of the CHFEB site and possible environmental impacts that may occur as the Proposed Action is implemented. Architectural descriptions and evaluations from previous reports are summarized.

Section 106 of the National Historic Preservation Act (NHPA) requires GSA to take into account the effects of its undertaking on properties listed or eligible for listing in the NRHP and to allow the Advisory Council on Historic Preservation reasonable opportunity to comment on the undertaking. An undertaking means a project, activity, or program funded in whole, or in part, under the direct or indirect jurisdiction of a federal agency, including, among other things, processes requiring a federal permit, license, or approval. In this case, the undertaking is federal (GSA) disposal of the CHFEB and construction of a new building on a portion of the site. The CHFEB has been determined eligible for the NRHP, due to the rarity of its architectural style and its association with master architect, William Pereira.

The EIS uses the following terms related to cultural resources:

- **Historic properties** are defined as any district, site, building, structure, or object that is included in or eligible for inclusion in the NRHP. In most cases, properties less than 50 years old are not considered eligible for the NRHP.
- **Traditional cultural properties** are a type of historic property eligible for the NRHP because of their association with cultural practices or beliefs of a living community that: (1) are rooted in that community's history or (2) are important in maintaining the continuing cultural identity of the community.
- **Cultural resources** include the remains and sites associated with human activities, such as prehistoric and ethno-historic Indian archaeological sites, historic archaeological sites, historic buildings and structures, and elements or areas of the natural landscape. Cultural resources determined to be NRHP-eligible or potentially eligible are historic properties.

Section 106 also requires that GSA seek concurrence with the State Historic Preservation Officer (SHPO) on any finding involving effects or no effects on historic properties. If Native American properties have been identified, Section 106 also requires that GSA consult with interested Native American tribes who might attach religious or cultural significance to such properties.

The Section 106 regulations state that the transfer or sale of a historic property out of federal ownership or control constitutes an adverse effect when undertaken without adequate and legally enforceable restrictions or conditions to ensure the long-term preservation of the property's historic significance (36 CFR 800.5(a)(2)(vii)).

GSA previously completed a determination of eligibility on the CHFEB in 2016 (Heritage Architecture and Planning) and prepared an historic structures report in 2019 (Architectural Resources Group 2019).

Table 3.2-1 below provides a summary of relevant federal regulations related to Cultural Resources.

Table 3.2-1. Federal Regulations Related to Evaluation of Cultural Resources

Federal Regulation	Citation	Relevance
Archaeological Resources Protection Act	United States Code, Title 16, Sections 470aa-mm	Regulates the protection of archaeological resources and sites that are on federal and Indian lands.
Native American Graves Protection and Repatriation Act	United States Code, Title 25, Sections 3001 et seq.	Provides a process for museums and federal agencies to return certain Native American cultural items, such as human remains, funerary objects,

		sacred objects, or objects of cultural patrimony, to lineal descendants and culturally affiliated Indian tribes.
National Historic Preservation Act of 1966	United States Code, Title 16, Sections 470 et seq.	Authorized the NRHP and coordinates public and private effort to identify, evaluate, and protect the nation's historic and archaeological resources.
National Register of Historic Places	Code of Federal Regulations, Title 36, Chapter I, Part 60	Recognizes resources of local, state, and national significance that have been documented and evaluated according to uniform standards and criteria.

The NRHP is authorized by the NHPA. It is the nation's official list of buildings, structures, objects, sites, and districts worthy of preservation because of their significance in American history, architecture, archeology, engineering, and culture. The NRHP recognizes resources of local, state, and national significance that have been documented and evaluated according to uniform standards and criteria. The NRHP is part of a national program managed by the National Park Service to coordinate and support public and private efforts to identify, evaluate, and protect America's historic and archaeological resources.

The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity and:

- A. are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. are associated with the lives of persons significant in our past; or
- C. embody distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. have yielded, or may be likely to yield, information important in prehistory or history.

In order to be eligible for listing in the NRHP, a property must retain sufficient integrity to convey its significance. The NRHP publication *How to Apply the National Register Criteria for Evaluation*, National Register Bulletin 15, establishes how to evaluate the integrity of a property: "Integrity is the ability of a property to convey its significance" (National Park Service, National Register of Historic Places 1991). The evaluation of integrity must be grounded in an understanding of a property's physical features, and how they relate to the concept of integrity. Determining which of these aspects are most important to a property requires knowing why, where, and when a property is significant. To retain historic integrity, a property must possess several, and usually most, aspects of integrity:

1. **Location** is the place where the historic property was constructed or the place where the historic event occurred.
2. **Design** is the combination of elements that create the form, plan, space, structure, and style of a property.
3. **Setting** is the physical environment of a historic property and refers to the character of the site and the relationship to surrounding features and open space. Setting often refers to the basic physical conditions under which a property was built and the functions it was intended to serve. These features can be either natural or manmade, including vegetation, paths, fences, and relationships between other features or open space.
4. **Materials** are the physical elements that were combined or deposited during a particular period or time, and in a particular pattern or configuration to form a historic property.

5. **Workmanship** is the physical evidence of crafts of a particular culture or people during any given period of history or prehistory and can be applied to the property as a whole, or to individual components.
6. **Feeling** is a property's expression of the aesthetic or historic sense of a particular period of time. It results from the presence of physical features that, when taken together, convey the property's historic character.
7. **Association** is the direct link between the important historic event or person and a historic property.

3.2.1 Affected Environment

For purposes of this analysis, the affected environment and area of potential effect (APE) are synonymous to the CHFb site, corresponding to the property boundaries. The CHFb consists of a complex of building and structures located within the APE. The GSA performed a records search encompassing the APE and a 1-mile radius. This search was done at the South Central Coastal Information Center to determine whether previously recorded sites or resources exist within the CHFb site, or whether the CHFb site has been subject to any previous cultural resources studies. The results of the records search are presented in Section 3.2.1.1 below.

A request was submitted to the California Native American Heritage Commission for a search of their Sacred Lands File to identify areas of Native American heritage significance that may be affected by the project, as well as any individuals or tribal entities who may have interest in or information about the CHFb site. The Native American Heritage Commission responded with positive results and provided information on tribal entities who may have additional information related to tribal values or resources related to the CHFb site. GSA conducted tribal consultation per the requirements of Section 106 of the NHPA as part of this project. Comments were received from the Juaneño Band of Mission Indians, Acjachemen Nation, which are integrated into section 3.2.2.4 below.

Due to prior disturbance of the CHFb site, archaeological investigation was limited to a review of the records search and historic maps and aerial photographs of the CHFb site and no archaeological field survey was conducted. Two architectural historians conducted a reconnaissance-level survey of the CHFb on January 31, 2020, targeted at confirming that the condition of the building is unchanged from the most recent evaluation report prepared for the property (Architectural Resources Group 2019) and to assess the potential for visual effects from the proposed undertaking.

Appendix C contains a detailed discussion of potentially affected archaeological and architectural history resources. Included are prehistoric and historical contexts, a site-specific history of the CHFb, an architectural description of the building and the surrounding landscape, and professional backgrounds of the architect and landscape architect.

3.2.1.1 Archaeological Resources in APE

A search of the records held by the California Historical Resources Information System (CHRIS) was conducted at the South-Central Coastal Information Center in February 2020. CHRIS records identified 56 reports within 1 mile of the APE. Some of these were large-scale overviews that included the APE, while many recount smaller projects related to road or infrastructure improvements within the 1-mile search but outside of the APE. There is no evidence that the APE itself had been subject to archaeological survey or investigation prior to the construction of the CHFb. CHRIS records also indicate the presence of 22 previously recorded cultural resources within the 1-mile search radius, all of which are prehistoric sites of various sizes and complexities. None have been documented directly within the APE, but five are within 0.15 mile. These resources include village sites with burials as well as smaller workshop sites or temporary campsites.

3.2.1.2 Eligibility of the Chet Holifield Federal Building

Per the correspondence between GSA and SHPO (2015), and the *Determination of Eligibility* (DOE) prepared by Heritage Architecture & Planning in 2016 (see Appendix D), the CHFB is individually eligible for listing in the NRHP at the state level of significance under Criterion C, as an excellent example of a Modern/Brutalist ziggurat building designed by master architect William L. Pereira. Although the building was less than 50 years old at the time of its evaluation, it was determined to be of exceptional importance due to its architectural style and type, and its association with Pereira.

The subsequent *Historic Structures Report* prepared by Architectural Resources Group in 2019 concurs with the recommendations of the Heritage Architecture & Planning report, offering the justification for significance under Criterion C as follows:

“The Chet Holifield Federal Building is an excellent example of Late Modern/Brutalist architecture executed on a monumental scale. Notable characteristics include its tiered shape, pre-cast concrete panels with impressed pattern, and horizontal bands of windows recessed under deep, angled eaves. The building’s unusual stepped ziggurat configuration is very rare; as noted in the *Determination of Eligibility*, only seven ziggurat buildings are known to exist nationwide, two of which are listed in the National Register. The property was designed by master architect William L. Pereira, a prominent and prolific leader of the Modernist movement whose iconic works include CBS Television City (1952), the Los Angeles County Museum of Art (1965), Geisel Library at UC San Diego (1970), San Francisco’s Transamerica Building (1972), and master plans for USC (1961) and UC Irvine (1962). The building’s surrounding site and landscaping contribute to its significance, with open space and complex topography enforcing a feel of monumentality.”

Neither report recommends the property eligible under Criterion A, B, or D. Both of the previous evaluations recommended the CHFB eligible under Criteria Consideration G for exceptional significance attained in the past 50 years. At the time this EIS was prepared, the property has become 50 years old. Thus, Criteria Consideration G is no longer applicable. GSA submitted a copy of the Draft DOE to the SHPO for review on December 7, 2015. A letter from the SHPO dated December 31, 2015, concurred with the DOE findings and clarified that the CHFB is eligible on the state level of significance (see Appendix B).

3.2.1.3 Character-Defining Features of the Chet Holifield Federal Building

Despite previous alterations (see Appendix C), the character-defining features of the CHFB and grounds are mostly intact and are as follows:

Site

Primary Character-Defining Features

- Large parcel with building situated at north end
- Designed topography integral to building: berms, slopes, building partially built into the ground
- Hardscaping around building, including driveway configurations, walkways, original ramps, and steps (particularly the shallow steps descending east and west from the original entry area at the primary façade)

Secondary Character-Defining Features

- Extensive surface parking lots
- General landscaping, including shaped planters, lawn areas, shrubs, mature trees
- Freestanding light poles with circular shades and trapezoidal concrete bases (parking areas)
- Flag poles at circular planter north of building

- Ancillary buildings: maintenance building, east guard station, and west guard station

Building Exterior

Primary Character-Defining Features (Due to the high visibility of all the building's façades and the uniformity of their design elements, all of the façades and related features are considered Primary character-defining features.)

- Monumental scale
- Overall massing: stepped ziggurat form; first and second stories as large stacked platforms supporting smaller third-seventh stories
- Horizontal orientation
- Highly symmetrical north and south façades
- Asymmetrical but nearly identical east and west façades that mirror each other (less small exterior differences like loading dock)
- Flat roofs with broad, deep, mansard eaves with stucco soffits and angled, fin-like eave supports of smooth concrete
- Cladding including textured (impressed cobble) precast concrete panels and smooth concrete panels
- Horizontal bands of fixed aluminum windows (bronze color with dark-coated glazing)
- Fully glazed aluminum double doors (bronze color with dark-coated glazing) at secondary entries
- Smooth concrete angled entry volumes with roof decks at south, east, and west façades
- Open roof decks fronting entries at second and third stories
- Lack of fenestration and expanses of textured concrete cladding at first and seventh stories
- Wood slat ceiling at south façade entry

Building Interior

Primary Character-Defining Features

- Main entry lobby at fourth floor (including space, configuration, and all original finishes)
- Wood slat ceilings at escalators (underfloor, first, second, third floors) and elevator lobbies (third, fourth, fifth, sixth floors)

Secondary Character-Defining Features

- Configuration of main corridors
- Configuration of central escalator banks at underfloor through third floors
- East escalator at each bank
- Configuration of central elevator lobbies
- Original wood slab doors (darker stain than replacements)
- Original suspended T-bar ceilings with inset fluorescent lighting

3.2.2 Environmental Consequences

Per NEPA, the significance of an environmental impact considers both context and intensity. Context is the geographic, biophysical, and society within which project effects will occur. Intensity refers to the severity

of the impact within that context. Impacts or effects can be direct or indirect and beneficial or adverse (40 CFR Part 1508.8).

Per NHPA and 36 CFR 800 of its implementing regulations, adverse effects to historic properties occur when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the NRHP.

Adverse effects on historic properties include, but are not limited to:

- (i) Physical destruction of or damage to all or part of the property;
- (ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR 68) and applicable guidelines;
- (iii) Removal of the property from its historic location;
- (iv) Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;
- (v) Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features;
- (vi) Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and
- (vii) Transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

For purposes of distinguishing between effects under NEPA and NHPA, references to "impacts" in Sections 3.2.2.1 through 3.2.2.4 refer to effects under NEPA; references to "effects" refer to effects under the NHPA.

3.2.2.1 No Action Alternative

Under the No Action Alternative, GSA would not construct a new USCIS building or relocate tenants to new offsite locations. GSA would retain the existing historic property (i.e., the CHFEB) without alterations and would be responsible for continued stewardship of the building's exterior, including addressing current needs, such as masonry stabilization, concrete spalling, and other repairs, as described in the Historic Structures Report (Architectural Resources Group 2019). As such, there would be no adverse effect under NHPA and no significant impact, either adverse or beneficial, under NEPA.

3.2.2.2 Alternative 1

Alternative 1 would include construction of a new federal building on 27.15 acres at the southeast corner of the current 92-acre site. The portion of the property not used for new construction, including the existing building, would be reported as excess in accordance with federal policy and disposed. The new construction would include an approximately 380,000-square-foot four-story building and a 1,517-space parking lot (see Figures 2-1 and 2-2). Under Alternative 1, adverse effects (under NHPA) and moderate permanent impacts (under NEPA) on the historic property would occur, ranging from partial demolition of the landscaping and site plan to visual impacts related to the loss of views to and from the historic property.

Additionally, Section 106 regulations state that the transfer or sale of a historic property out of federal ownership or control constitutes an adverse effect when undertaken without adequate and legally

enforceable restrictions or conditions to ensure the long-term preservation of the property's historic significance. As such, the disposal of the property could result in an adverse effect (under NHPA) and a significant impact (under NEPA). The Section 106 process is currently underway to determine effects to the property under NHPA, and results of this process, as well as any applicable impact reduction measures, will be detailed in the ROD for this EIS.

Adverse effects and significant impacts could also occur due to a potential to encounter archaeological resources during construction.

Future Redevelopment

The Section 106 process that is currently underway would identify any adverse effects under NHPA and significant impacts from federal disposal of the property and potential resultant future development. Results of this process, as well as any applicable impact reduction measures, will be detailed in the ROD for this EIS. Follow-on NEPA, NHPA, or CEQA analyses may be required (depending on who acquires the site) for any proposed redevelopment plans presented by a future developer, to include further consideration of cultural resources. Consultation with the SHPO would be required if federal funds or agency involvement required compliance with NHPA and NEPA. Future owners could be financially responsible for conditions of the project such as Historic American Buildings Survey documentation, historic interpretative programs/products, and/or comprehensive surveys of similar resources in Orange County (such as all Pereira-designed buildings). Redevelopment of other areas of the site could result in adverse effects and moderate to significant impacts to archaeological sites, the landscape, viewshed, and setting of the historic property. These effects could occur as a result of new construction.

3.2.2.3 Preferred Alternative (Alternative 2)

Under the Preferred Alternative, the entire CHFB site would be reported as excess in accordance with federal policy and disposed. No construction would occur at the site in advance of disposal. Although no construction would occur at the site, there is the potential for adverse effects and significance impacts on the historic property. As with Alternative 1, Section 106 regulations state that the transfer or sale of a historic property out of federal ownership or control constitutes an adverse effect when undertaken without adequate and legally enforceable restrictions or conditions to ensure the long-term preservation of the property's historic significance. As such, the disposal of the property could result in adverse effects (under NHPA) and significant impacts (under NEPA). The Section 106 process is currently underway to determine effects to the property under NHPA, and results of this process, as well as any applicable impact reduction measures, will be detailed in the ROD for this EIS.

Future Redevelopment

Similar to Alternative 1, the Section 106 process that is currently underway would identify any adverse effects under NHPA and significant impacts from federal disposal of the property and potential resultant future development. Results of this process, as well as any applicable impact reduction measures, will be detailed in the ROD for this EIS.

Follow-on NEPA, NHPA, or CEQA analyses may be required (depending on who acquires the site) for any proposed redevelopment plans presented by a future developer, to include further consideration of cultural resources. Consultation with the SHPO would be required if federal funds or agency involvement required compliance with NHPA and NEPA. Future owners could be financially responsible for conditions of the project such as Historic American Buildings Survey documentation, historic interpretative programs/products, and/or comprehensive surveys of similar resources in Orange County (such as all Pereira-designed buildings). Redevelopment of other areas of the site could result in adverse effects and moderate to significant impacts to archaeological sites, the landscape, viewshed, and setting of the historic property. These effects could occur as a result of new construction.

3.2.2.4 Impact Reduction Measures

Under Alternative 1, the project could be redesigned to change the height of the new construction to less than 4 stories. The revised height could be determined by a study of the viewshed toward the CHFEB that would determine the maximum massing and height of the new construction that would retain the current distant view of the historic property.

In consideration of archaeological resources, the APE should be considered sensitive for prehistoric resources and monitoring by both a qualified archaeologist and a Native American monitor is recommended during any ground-disturbing activities. It is further recommended that a discovery plan be put into place that governs treatment of any inadvertent discoveries of cultural resources that may occur during project construction.

The Section 106 process is currently underway to determine effects to the property under NHPA, and results of this process, to include any applicable impact reduction measures, will be detailed in the ROD for this EIS.

3.3 AIR QUALITY AND GREENHOUSE GAS EMISSIONS

Air quality is the measure of the atmospheric concentration of defined pollutants in a specific area. An air pollutant is any substance in the air that can cause harm to humans or the environment. Pollutants may be natural or human-made and may take the form of solid particles, liquid droplets, or gases. Natural sources of air pollution include smoke from wildfires, dust, and wind erosion. Human-made sources of air pollution include emissions from vehicles; dust from unpaved roads, agriculture, or construction sites; and smoke from human-caused fires. Air quality is affected by pollutant emission sources, as well as the movement of pollutants in the air via wind and other weather patterns.

Greenhouse gas (GHG) emissions released into the atmosphere as a result of human-induced fossil fuel combustion are widely believed to be contributing to changes in global climate. GHGs, which include carbon dioxide (CO₂), methane (CH₄), nitrogen oxides (NO_x), water vapor, and several trace gases, trap radiant heat reflected from the Earth in the atmosphere, causing the average temperature to rise. The predominant GHGs emitted in the U.S. are CO₂, CH₄, nitrous oxide (N₂O), hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. In the U.S., anthropogenic GHG emissions come primarily from burning fossil fuels. Although GHG levels have varied for millennia (along with corresponding variations in climate conditions), recent and more dramatic increases have contributed to overall climate change.

3.3.1 Affected Environment

Because air quality is measured and regulated on a regional level, the air quality analysis in this EIS utilizes air quality data from the South Coast Air Quality Management District. The South Coast Air Quality Management District encompasses all of Orange County, as well as portions of Los Angeles, Riverside, and San Bernardino counties in California. For purposes of this analysis, and because air pollution dissipates throughout the atmosphere, the region of influence (ROI) for air quality is defined as the South Coast Air Quality Management District boundaries. The Proposed Action would take place primarily within Orange County, as well as some parts of Los Angeles County.

3.3.1.1 Air Quality

The U.S. Environmental Protection Agency (USEPA) Region 9 and the California Air Resources Board (CARB) regulate air quality in California. The Clean Air Act (CAA) (42 USC 7401-7671q), as amended, gives the USEPA the responsibility to establish the primary and secondary National Ambient Air Quality Standards (NAAQS) (40 CFR Part 50) that set acceptable concentration levels for six criteria pollutants, which are compounds that cause or contribute to air pollution and which could endanger public health and the environment. The six criteria pollutants are: particulate matter (including fine particulate matter [PM₁₀] and very fine particulate matter [PM_{2.5}]), sulfur dioxide (SO₂), carbon monoxide (CO), NO_x, ozone (O₃) and lead (Pb). O₃ is a strong photochemical oxidant that is formed when nitrogen dioxide (NO₂) reacts with volatile organic compounds (VOCs) and oxygen in the presence of sunlight. O₃ is considered a secondary pollutant because it is not directly emitted from pollution sources but is formed in the ambient air.

Short-term standards (1-, 8-, and 24-hour periods) have been established for criteria pollutants that contribute to acute health effects, while long-term standards (annual averages) have been established for pollutants that contribute to chronic health effects. Each state has the authority to adopt standards stricter than those established under the federal program; California has adopted stricter standards for some criteria pollutants (see Table 3.3-1). Areas that exceed the NAAQS are designated as nonattainment areas, and those in accordance with the standards are designated as attainment areas. Areas that have been re-designated from nonattainment to attainment are called maintenance areas.

Because the project would occur in a nonattainment area, the General Conformity Rule requirements apply. The General Conformity Rule was established under the CAA and ensures that the actions taken by federal agencies do not interfere with a state's plans to attain and maintain the NAAQS. According to the rule, if a project takes place in an area that is in attainment, then the general conformity requirements do not apply to the project. The General Conformity Rule states that, if a project would result in a total net increase in

direct and indirect emissions of nonattainment or maintenance area pollutants that are less than the applicable *de minimis* (i.e., negligible) thresholds established in 40 CFR 93.153(b), detailed conformity analyses are not required pursuant to 40 CFR 93.153(c).

The USEPA monitors levels of criteria pollutants at representative sites in each region throughout the U.S. For purposes of analysis, air monitoring data for Orange, Los Angeles, and Riverside counties were used to define the existing air quality at and around the CHFB. Table 3.3-1 shows the NAAQS, the California Ambient Air Quality Standards (CAAQS), the USEPA’s “design value” for each pollutant, and available monitoring data for each criteria pollutant. The design value is a statistic that is calculated in a manner consistent with the corresponding ambient air quality standard, using air quality monitoring data (USEPA 2020a). Therefore, the design value describes the air quality status of a given location relative to the NAAQS. Design values are computed and published annually by the USEPA.

As shown in Table 3.3-1, Orange County did not meet the 1-hour or 8-hour O₃ NAAQS and CAAQS, and the 24-hour and annual NAAQS and CAAQS for PM_{2.5}. The design values for these pollutants exceed the respective NAAQS and CAAQS. These data are consistent with the USEPA’s list of counties currently designated as nonattainment areas, which shows Orange County as a nonattainment area for O₃ and PM_{2.5} (USEPA 2020b). In addition, Orange County was previously in non-attainment for CO, NO₂, and PM₁₀ and is currently designated as a “maintenance” area for these pollutants.

Table 3.3-1. Ambient Air Quality Standards and Measured Criteria Pollutant Concentrations

Pollutant	Averaging Time	NAAQS ^a	CAAQS	Design Value ^b (2018)	Monitoring Data ^c (2018)
CO	1-hour	35 ppm	20 ppm	–	3.025 ppm
	8-hour	9 ppm	9 ppm	3.1 ppm	–
NO ₂	1-hour	100 ppb	180 ppb	–	67 ppb
	Annual arithmetic mean	53 ppb	30 ppb	30 ppb	–
O ₃	1-hour	–	0.09 ppm	0.149 ppm	0.121 ppm
	8-hour	0.070 ppm	0.070 ppm	0.111 ppm	0.088 ppm
SO ₂	1-hour	75 ppb	250 ppb	–	–
	24-hour	140 ppb	40 ppb	–	–
PM _{2.5}	24-hour	35 µg/m ³	–	38 µg/m ³	68.1 µg/m ³
	Annual arithmetic mean	12 µg/m ³	12 µg/m ³	14.7 µg/m ³	–
PM ₁₀	24-hour	150 µg/m ³	50 µg/m ³	–	130.1 µg/m ³
	Annual arithmetic mean	–	20 µg/m ³	–	–
Pb ^d	3-month average	0.15 µg/m ³	–	–	–
	30-day average	–	1.5 µg/m ³	–	–

µg = micrograms; CO = carbon monoxide; m³ = cubic meter; NO₂ = nitrogen dioxide; O₃ = ozone; Pb = lead; PM_{2.5} = particulate matter of diameter 2.5 microns or less; PM₁₀ = particulate matter of diameter 10 microns or less; ppb = parts per billion; SO₂ = sulfur trioxide
Source: USEPA 2020c; CARB 2020a; USEPA 2020a; CARB 2020b.

¹ Only the primary NAAQS are listed.

² Design values are published by USEPA only for areas designated non-attainment or maintenance for certain pollutants.

³ Monitoring data based on monitor locations with the highest reported value within the County.

⁴ Lead is not considered further in this analysis because none of the project activities would generate lead emissions.

The CAA, as amended in 1990, mandates that states develop a State Implementation Plan (SIP) that explains how the state will comply with the CAA and achieve and maintain attainment of the NAAQS. The

California SIP applies to industrial sources, commercial facilities, and residential development activities. Regulation occurs primarily through a process of reviewing engineering documents and other technical information, applying emission standards and regulations in the issuance of permits, performing field inspections, and assisting industries in determining their compliance status.

CARB has the authority to issue permits for the construction and operation of new or modified stationary source air emissions in California. CARB air permits are required for any facility that will emit or currently emits regulated pollutants; these facilities must comply with the following regulations of the CAA: New Source Review, Prevention of Significant Deterioration (PSD), Title V Permitting, National Emission Standards for Hazardous Air Pollutants (NESHAP), and New Source Performance Standards. There are also specific California State regulations that apply to activities likely to occur during construction. These regulations are outlined in California Code of Regulations Title 17, Chapter 1 and include the following:

- Mandatory Greenhouse Gas Emissions Reporting (Title 17.3.1.10); and
- Ambient Air Quality Standards (Title 17.3.1.1.5).

The South Coast Air Quality Management District has also codified rules related to air emissions control. These include, among others, requirements for control of dust from construction and other sources, (Rule 403), prohibitions on discharge of certain gases (Rule 407), permitting and registration requirements of emissions sources (see, for example, Rules 201, 203, and 2100), and asbestos (Rule 1403).

The CHFEB is located in downtown Laguna Niguel, in a developed and urban/suburban portion of Orange County with residences located nearby. Sensitive receptors (e.g., daycares, hospitals, schools) and their distance from the CHFEB are listed in Table 3.3-2. Daycares and schools within 1 mile of the CHFEB and hospitals within 10 miles of the CHFEB are included.

Table 3.3-2. Sensitive Receptors and Distances from the CHFEB

Name	Distance (miles)
Schools/Daycares	
Aliso Niguel High School	0.2
Wood Canyon Elementary	0.3
Journey School	0.3
Laguna Niguel Elementary	0.4
Tutor Time	0.4
St. Mary's School	0.5
Aliso Viejo Christian School	0.6
St Mary and All Angels School	0.6
Mission Lutheran Preschool	0.6
Mission Lutheran School	0.7
Laguna Niguel Montessori Center	0.7
Vandamme Academy	0.8
Temple Beth El South Orange County ECC	0.8
Little Big Preschool	0.8
The Farm School	0.8
Kristin's Kiddieland	0.8
Academy on the Hills	1.0
Hospitals	
Saddleback Memorial Medical Center San Clemente	3.4
Saddleback Memorial Medical Center Laguna Hills	4.4
Hoag Hospital Irvine	4.9
CHOC Children's at Mission Hospital	5.5
Saint Joseph Health Mission Hospital	6.1
Hoag General Hospital	8.0

Table 3.3-2. Sensitive Receptors and Distances from the CHFB

Name	Distance (miles)
Mission Hospital Laguna Beach	9.0

Source: ORNL 2019a; ORNL 2019b; ORNL 2018a; ORNL 2018b; ORNL 2018c

CHFB = Chet Holifield Federal Building; CHOC = Children’s Hospital of Orange County;

ECC = Early Childhood Center

3.3.1.2 Greenhouse Gas Emissions

The ROI for GHGs differs from other resource areas considered in this EIS since the concerns about GHG emissions are primarily related to climate change, which is global and cumulative in nature. Therefore, the affected environment is discussed broadly using a global, national and regional framework to provide context for the analysis of potential GHG impacts from the Proposed Action.

Recent scientific evidence indicates a correlation between increasing global temperatures over the past century and the worldwide increase in anthropogenic (human) GHG emissions (IPCC 2018). Climate change associated with global warming is predicted to produce negative environmental, economic, and social consequences across the globe in the coming years.

GHG Emissions and Effects

GHGs are gases that trap heat in the atmosphere by absorbing outgoing infrared radiation. GHG emissions occur from both natural processes as well as human activities. Water vapor is the most important and abundant GHG in the atmosphere; however, human activities produce only a small amount of the total atmospheric water vapor. The most common GHGs emitted from natural processes and human activities include CO₂, CH₄, and N₂O. The main source of GHGs from human activities is the combustion of fossil fuels such as oil, coal, and natural gas. Other examples of GHGs created and emitted primarily through human activities include fluorinated gases (e.g., perfluorocarbons) and sulfur hexafluoride. The main sources of these man-made GHGs are refrigerants and electrical transformers.

Numerous studies document the recent trend of rising atmospheric concentrations of CO₂. The longest continuous record of carbon dioxide monitoring extends back to 1958 (Keeling 1960; Scripps 2020). These data show that atmospheric CO₂ levels have risen an average of 1.5 parts per million (ppm) per year over the last 60 years, with the growth rate accelerating from around 1 ppm per year in the 1960s to 2 ppm per year in the 2000s (NOAA 2020). The global atmospheric CO₂ concentration has now passed 400 ppm, a level that last occurred about 3 million years ago when both global average temperature and sea level were significantly higher than today (USGCRP 2017). Rising atmospheric concentrations of CO₂ and other GHGs have been identified as the primary driver behind significant changes to global climate patterns. Observed changes to global climate include rising average temperatures, shrinking glaciers and sea ice, rising sea levels, increased drought and wildfires, increased flooding and other severe weather events, thawing permafrost, a lengthened growing season, and shifts in plant and animal ranges. International and national organizations independently confirm these findings and predict that these trends are likely to continue into the foreseeable future unless action is taken to reduce global GHG emissions (IPCC 2018; USGCRP 2017).

Each GHG has been assigned a global warming potential (GWP) by the USEPA (USEPA 2020d). The GWP is the ability of a gas or aerosol to trap heat in the atmosphere. The GWP rating system is standardized to CO₂, which is given a value of one. For example, CH₄ has a GWP of 25, which means that it has a global warming effect 25 times greater than CO₂ on an equal-mass basis. To simplify GHG analyses, total GHG emissions from a source are often expressed as a CO₂ equivalent, which is calculated by multiplying the emissions of each GHG by its GWP and adding the results together to produce a single, combined emission rate representing all GHGs. While CH₄ and N₂O have much higher GWPs than CO₂, CO₂ is emitted in such large quantities that it is the predominant contributor to global CO₂ equivalent emissions from both natural processes and human activities.

3.3.2 Environmental Consequences

To evaluate air quality impacts and GHG emissions, alternatives were reviewed for their potential to cause the following:

- Result in emissions of criteria pollutants or HAPs that would exceed relevant air quality or health standards including the NAAQS or CAAQS;
- Violate any federal or state permits; or
- Conflict with local or regional air quality management plans to attain or maintain compliance with the federal and state air quality regulations.

A significant adverse impact from GHG emissions would occur if that action would result in:

- Increase in direct or indirect emissions from fixed and mobile sources such as stationary fuel combustion, construction equipment, and employee vehicles; or
- Increase in indirect offsite GHG emissions associated with electricity generation.

When assessing significance, GSA also considered the potential for best management practices to reduce the severity or extent of these impacts. Applicable best management practices are described below, and in Section 3.3.2.4.

3.3.2.1 *No Action Alternative*

Under the No Action Alternative, GSA would not construct a new USCIS building or relocate tenants to new offsite locations. Ongoing operations and maintenance at the CHFB would continue to occur, including periodic emergency generator maintenance as well as vehicle traffic created from trucks and personal vehicles. These sources would generate minor amounts of criteria air pollutants and GHG emissions. No additional impacts related to air quality or GHGs would occur.

3.3.2.2 *Alternative 1*

Construction

Air Quality

Alternative 1 would have minor and temporary direct impacts on air quality during construction of the new USCIS building.

As explained in Section 3.3.1.1, the USEPA's General Conformity Rule under the CAA ensures that the actions taken by federal agencies do not interfere with a state's plans to attain and maintain the NAAQS (40 CFR 93.153(b)). Because Orange County is currently designated a nonattainment area for O₃ and PM_{2.5} and a maintenance area for CO, NO₂, and PM₁₀, the General Conformity Rule requirements apply. Therefore, Alternative 1 is subject to review under the General Conformity Rule and a general conformity analysis is required (see Appendix E). For completeness, direct and indirect emissions of all applicable criteria pollutants (i.e., CO, VOCs [as a precursor for O₃], NO₂, SO₂, PM₁₀, and PM_{2.5}) were estimated for the construction phase of Alternative 1. These estimated values were then compared to the General Conformity Rule's *de minimis* emissions thresholds to determine whether implementation of Alternative 1 would impact air quality in the region.

Construction emissions were estimated for on-road vehicles and nonroad construction equipment. Since a detailed construction plan has not yet been developed for the site, the number and types of construction equipment needed were estimated based on available data for other, similar projects, and in coordination with appropriate GSA staff. Emissions rates from on-road vehicles such as privately-owned vehicles were estimated using industry standard emission rates (Argonne National Laboratory 2013). Emission rates for nonroad vehicles such as excavators, cranes, graders, backhoes, and bulldozers were estimated using the

USEPA MOVES model. For purposes of analysis and to provide a conservative estimate of potential air emissions, the following assumptions were made:

- During construction, all nonroad equipment would be operated 8 hours per day. This leads to a conservatively high estimate, since in practice equipment would not be operated for eight hours each day.
- On-road vehicles would travel various distances. Worker vehicles were assumed to travel 20 miles per day, while vendor and waste trucks were assumed to travel 50 miles per day.

The results of the conformity analysis are presented in Table 3.3-3. Full documentation of the methodology used to estimate the air emissions is presented in Appendix E.

Table 3.3-3. Estimated Construction-Related Air Emissions Under Alternative 1

Source	Criteria Pollutant Emissions (tons)					
	CO	NO ₂	PM ₁₀	PM _{2.5}	SO ₂	VOCs
Construction Equipment	0.81	1.48	0.11	0.11	0.00	0.15
Worker Vehicles	11.83	0.65	0.13	0.08	0.02	0.68
Delivery and Waste Trucks	2.31	2.27	0.24	0.12	0.02	0.18
Fugitive Dust			29.80	4.71		-
Total	14.95	4.40	30.29	5.01	0.04	1.01
<i>De minimis Threshold</i>	100	100	100	70	100	10

Source: USEPA 2020e.

Note: Individual numbers may not sum to totals due to rounding.

CO = carbon monoxide; NO₂ = nitrogen dioxide; PM_{2.5} = particulate matter of diameter 2.5 microns or less; PM₁₀ = particulate matter of diameter 10 microns or less; SO₂ = sulfur dioxide; VOC = volatile organic compounds.

As shown in Table 3.3-3, the total annual direct and indirect emissions associated with the construction of Alternative 1 would not exceed the *de minimis* threshold rate for any of the criteria pollutants analyzed per the thresholds identified in Section 3.3.1. Therefore, further analysis under the General Conformity Rule is not required. Overall, the construction/demolition activities would cause short-term, minor adverse impacts to air quality and could affect individuals living or working in close proximity to the CHFB site. These impacts would occur during the estimated 30 months of construction and would end once construction is completed.

Alternative 1 would comply with all applicable federal, state and local regulations relating to air quality, including any permitting and registration requirements. Table 3.3-4 provides an overview of the applicability of the federal CAA air regulations for Alternative 1.

Table 3.3-4. CAA Regulatory Review for Alternative 1

CAA Regulation	Description of the Regulation	Applicability to Alternative 1
New Source Review	New Source Review permitting protects air quality when air emissions sources are built or modified.	If new emergency generators are installed under Alternative 1, they would need to undergo the New Source Review permitting process.
PSD	PSD applies to new major sources or modifications at existing sources of air pollutants where the area the source is located is in <i>attainment</i> or unclassifiable.	PSD review would be required if new emergency generators are installed under Alternative 1.
Title V permitting requirements	A Title V Permit requires sources of air pollutants to obtain and operate in compliance with an operating permit. A Permit is required if a source has actual or potential emissions greater than or equal to 100 tons per year.	A Title V Permit would likely not be required because any new emergency generators installed under Alternative 1 would be below the 100 tons per year threshold.
NESHAP	NESHAP are stationary source standards for HAPs. HAPs are those pollutants that are known or suspected to cause cancer or other serious health effects.	The use of Maximum Available Control Technology would not be required because the potential HAP emissions would likely not exceed NESHAP thresholds under any of the alternatives.
NSPS	NSPS are technology-based emission standards which apply to new, modified, and reconstructed facilities in specific source categories such as manufacturers of glass, cement, rubber tires, and wool fiberglass.	The project would be exempt from NSPS permitting requirements because none of the alternatives would involve construction or operation of any of these types of facilities.

Source: USEPA 2020f.

CAA = Clean Air Act; HAP = Hazardous Air Pollutants; NESHAP = National Emission Standards for Hazardous Air Pollutants; NSPS = New Source Performance Standards; PSD = Prevention of Significant Deterioration

Greenhouse Gases

Alternative 1 would generate GHG emissions during construction activities, and in the short term would represent a negligible, incremental contribution to global GHG emissions and climate change. Short-term GHG emissions associated with Alternative 1 would primarily result from the use of fuel in construction equipment, worker vehicles, and delivery and refuse trucks. GHG emissions were estimated using USEPA emission factors (USEPA 2018) and are presented in Table 3.3-5.

Table 3.3-5. Estimated Construction-Related Greenhouse Gas Emissions Under Alternative 1

Source	Greenhouse Gas Emissions (metric tons)			
	CO ₂	CH ₄	N ₂ O	CO ₂ -eq
Construction Equipment	729.01	0.04	0.02	735.56
Worker Vehicles	1,175.47	0.05	0.01	1,180.71
Delivery and Waste Trucks	2,763.40	0.07	0.03	2,773.07
Total	4,667.88	0.15	0.06	4,689.34

CH₄ = methane, CO₂ = carbon dioxide; CO₂-eq = carbon dioxide equivalent; N₂O = nitrous oxide

As shown in Table 3.3-5, construction related GHG emissions under Alternative 1 would represent less than 0.001 percent of California’s annual GHG emissions in 2017 (424 million metric tons of CO₂ equivalent) (CARB 2019).

Operations

Air Quality

Under Alternative 1, operations of a new USCIS building would have a long-term, negligible to minor impact on air quality. Onsite sources of air emissions would likely include fuel combustion for building heating. The new building would consist of approximately 380,000 square feet of floor space, which is substantially smaller than the existing CHFB (i.e., approximately 1 million square feet of floor space). Therefore, the new building would require considerably less energy to operate. In addition, as described in Section 2.1.1, all GSA buildings are required to attain at a minimum LEED® Gold certification. However, GSA intends to construct the new building to meet LEED® Platinum requirements, which is the highest level attainable under the LEED® certification system. As a result, the new building would likely be substantially more energy efficient than the existing CHFB. Less fuel would be needed to heat the building as well, resulting in lower air emissions relative to that of the existing CHFB. The LEED® rating system allows for flexibility in how project teams choose to meet the number of points required to obtain a given certification level. Therefore, the actual energy performance of the new building, at either the LEED® Gold or Platinum level, would likely not be known until building design is substantially completed.

Other onsite sources of air emissions include emergency generators. The CHFB is currently equipped with a single, 350 kW standby diesel generator that provides backup power to elevators, stair lights, and the fire suppression system, as well as a smaller generator that provides power to Immigrations and Customs Enforcement (ICE), a tenant within the building. Emergency generators are required to undergo periodic testing to verify their fitness for operations in the event of an actual emergency, which results in small amounts of air emissions. Since the new building would have a considerably smaller footprint and would be more energy efficient, it would likely require a smaller emergency generating capacity as compared to the existing CHFB.

Operations of the new building would also require grid-supplied electricity, which is generated offsite, and, depending on the energy source, may result in air pollutant emissions. Since the new building would be smaller and likely more energy efficient, offsite air pollutant emissions are likely to be reduced compared to current conditions.

The parcel to be developed currently consists of several gravel lots that have deteriorated over time. Improving this site with a new USCIS building and new pavement would likely provide a minor beneficial impact by reducing fugitive dust.

Under Alternative 1, up to 1,000 individuals currently working at the CHFB would be relocated to other leased office space throughout the region. It is assumed that these individuals would be relocated to existing Class A office space. Federal agencies are required to preferentially lease space in buildings that meet energy-efficiency and other sustainability requirements, except under exceptional circumstances (GSA 2020a). Therefore, it is likely that any leased locations selected for agencies relocating from the CHFB would be more energy efficient than the CHFB, and would likely lead to a negligible change overall in energy-related air pollutant emissions as compared to current conditions. Vehicle miles traveled for those employees relocated may be impacted depending upon the location of their new office space within the region, which could result in increases or decreases in vehicle emissions depending on final lease location and employee place of residence. For purposes of this analysis, it is assumed impacts associated with occupancy of new offsite office locations, to include operational emissions from the leased space and emissions from vehicle trips to the leased space, has been considered in previous CEQA analyses when the respective office buildings were originally reviewed and approved by local City staff. Therefore, relocation of individuals to other leased office space throughout the region as part of Alternative 1 would not generate additional or greater impacts to air quality beyond those disclosed during CEQA approvals, and overall impacts would be less than significant.

There would be no other impacts to air quality or GHGs from disposal of the remaining 64.85 acres of the CHFB site.

Greenhouse Gases

Under Alternative 1, operations of a new USCIS building would have long-term, minor beneficial direct impacts on GHG emissions. Similar to air emissions, onsite sources of GHGs include fuel use for building operations and emergency generators. Compared to the CHFB, the new building would likely result in reduced fossil fuel related GHG emissions due to its smaller footprint and greater energy efficiency. Additional sources of GHGs include fugitive leaks of refrigerants from cooling and refrigeration equipment. Because of its smaller size, the new building would likely require a smaller-sized cooling system; therefore, fugitive emissions would also be lower.

Operations of the new building would also require less purchased electricity, since it would be smaller and likely more energy efficient. Therefore, offsite GHG emissions are likely to be considerably reduced compared to current conditions. Similar to air quality, leasing of office space would likely lead to a negligible change in GHG emissions when compared to current conditions.

Future Redevelopment

Under a renovation scenario, adverse indirect impacts could occur from renovation of the existing CHFB on the remaining 64.85-acre parcel to be disposed. There could be minor impacts to air quality and GHGs during construction. These impacts could occur as a result of fuel use in construction equipment, worker vehicles, and trucks. Details on renovation are unknown at this time and are not part of GSA's action; however, it is assumed that the extent of air quality and GHG impacts under a renovation scenario could be much less than the impacts associated with construction of a new building, as discussed above. Renovation may require some ground disturbance and interior building work to bring the building up to current California Building Code, which could result in some emissions of criteria air pollutants from equipment and vehicles, as well as fugitive dust. Best management practices could be utilized to minimize fugitive dust.

Operations of the CHFB under a renovation scenario could result in similar amounts of air pollutants and GHG emissions as under current conditions, from sources such as emergency generators and vehicle traffic; however, there would likely not be a significant change compared to current conditions. Improvements to building energy efficiency as a result of renovations could potentially lead to a slight decrease in energy-related air pollutant and GHG emissions. Assuming that the number of workers at the renovated building would stay consistent with current levels (approximately 3,000), there could be an overall increase net increase of 2,000 individuals commuting to the site over baseline conditions when considering the 2,000 tenants in the proposed new USCIS building which would continue to commute to the site. However, it is possible that many of these new individuals could be relocating from other locations in the region, and shifting their commuting patterns to result in no net increase of regional tenant commutes. To the extent that individuals commute longer distances as a result of the change in their work location, there could be a negligible to minor increase in regional air pollutant and GHG emissions.

Under a demolition/new construction scenario, indirect impacts could occur from demolition of the existing CHFB and new construction on the remaining 64.85-acre parcel to be disposed. There could be minor to moderate impacts to air quality and GHGs during construction. These impacts could occur as a result of fuel use in construction equipment, worker vehicles, and trucks, and due to fugitive dust emissions, similar to the construction impacts discussed above for the USCIS building. However, the magnitude of impacts may be greater given the larger area being disturbed, the additional steps involved in demolition of the existing CHFB, and the size and scale of development to be constructed. Demolition of the existing CHFB could require up to 44,000 haul trips over an approximate 36-month period, or approximately 60 haul trips per day, with up to 300 workers on site during demolition.

Operations of new development could result in air pollutant and GHG emissions; the amount of emissions could vary greatly depending on building energy efficiency, size, and use; as well as onsite renewable energy used, or the purchase of renewable energy generated offsite. Any increases, however, would likely be less than significant as new construction would likely be energy efficient compared to the existing

CHFb. The number of workers and visitors commuting to the site and the distance traveled could also affect both air pollutant and GHG emissions and could result in negligible to minor increases in vehicle emissions, similar to as described for the renovation scenario.

Follow-on NEPA or CEQA analyses may be required (depending on who acquires the site) for any proposed redevelopment plans presented by a future developer, to include further consideration of air quality and GHG emissions, once final development plans are completed.

3.3.2.3 Preferred Alternative (Alternative 2)

Under the Preferred Alternative, there would be negligible direct impacts to air quality or GHG emissions during construction or operations. All tenants would be removed from the CHFb and no construction would occur at the site. Off-site leasing of new office space may require office buildouts, which could entail negligible, temporary increases in air pollutant and GHG emissions. These activities would be required to comply with all applicable federal, state and local regulations. Similar to Alternative 1, leasing of office space would likely lead to a negligible change in air pollutant and GHG emissions compared to current conditions. Also similar to Alternative 1, it is assumed impacts associated with occupancy of new offsite office locations, to include operational emissions at the leased space and emissions from vehicle trips to the leased space, has been considered in previous CEQA analyses when the respective office buildings were originally reviewed and approved by local City staff. Relocation of individuals to other leased office space throughout the region as part of the Preferred Alternative would not generate additional or greater impacts to air quality beyond those disclosed during CEQA approvals, and overall impacts would be less than significant.

Future Redevelopment

Under a renovation/new construction scenario, indirect impacts could occur from renovation of the existing CHFb, and new construction on the south or west end of the 92-acre site to be disposed. Under this scenario for the Preferred Alternative, there could be minor indirect impacts to air quality and GHGs during renovation activities, similar to as described under Alternative 1 Future Redevelopment (renovation scenario). In addition, it is assumed there could be some new construction on the south or west end of the site, resulting in similar, minor impacts as described for construction of the new USCIS building under Alternative 1.

Under a demolition/new construction scenario, indirect impacts could occur from demolition of the existing CHFb and new construction on the 92-acre site to be disposed. Under this scenario for the Preferred Alternative, there could be moderate indirect impacts to air quality and GHGs during construction. Impacts would likely be similar to the impacts described under Alternative 1 Future Redevelopment (demolition/new construction scenario) but could be to a greater intensity, as up to 92 acres of the site could potentially be impacted.

Operations of buildings under a renovation/new construction or a demolition/new construction scenario would likely be similar to the types of impacts described under Alternative 1. There could be impacts to air quality and GHGs; the severity of these impacts could vary greatly depending on building size, use, energy efficiency, and the use of renewable energy.

Similar to Alternative 1, follow-on NEPA or CEQA analyses may further address air quality and GHG emissions once final development plans are completed.

3.3.2.4 Impact Reduction Measures

Construction activities at the CHFb would generate fugitive dust and other emissions. Emissions from open areas (e.g., a construction site) require reasonable precautions to prevent PM from becoming airborne. The following best management practices (BMPs) would minimize particulate and other air pollutant emissions during construction:

- Adopting the best management practices detailed in the South Coast Air Quality Management District's Rule 403 for fugitive dust.
- Stabilizing open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative where appropriate, including both inactive and active sites, during workdays, weekends, holidays, and windy conditions;
- Installing wind fencing and phasing grading operations where appropriate, and using water trucks for stabilization of surfaces under windy conditions;
- When hauling material and operating non-earthmoving equipment, preventing spillage and limiting speeds to 15 miles per hour. Earth-moving equipment would be limited to 10 miles per hour;
- Paving roadways where necessary, and maintaining them in a clean condition by promptly removing spilled or tracked dirt or other materials;
- Covering open equipment when conveying or transporting material likely to prevent material from becoming airborne;
- Minimizing the use and number of trips of heavy equipment;
- Maintaining and tuning all engines per manufacturer specifications to perform at USEPA certification levels, where applicable, and to perform at verified standards applicable to retrofit technologies.
- Conducting periodic, unscheduled inspections to limit unnecessary idling and to ensure that construction equipment is properly maintained, tuned, and modified consistent with established specifications;
- Prohibiting construction vehicles both on- and off-site from excess idling, consistent with current CARB Regulations;
- Prohibiting tampering with engines and requiring continuing adherence to manufacturer's recommendations;
- Encouraging bids that include use of energy and fuel-efficient fleets and Best Available Control Technology, particularly those seeking to deploy zero-emission technologies;
- Using alternative fueled vehicles and construction equipment where feasible;
- Using energy efficient lighting systems, such as LED technology, where feasible;
- Using lighter-colored pavement where feasible;
- Recycling construction debris to the maximum extent feasible;
- Planting shade trees in or near construction projects where feasible; and
- Developing a construction traffic and parking management plan to minimize traffic interference and maintains traffic flow.

Similar measures may be required and implemented for any future development on the site as part of Alternatives 1 and 2, regardless of ownership.

3.4 SOCIOECONOMICS

The analysis of socioeconomic resources identifies those aspects of the social and economic environment that are sensitive to changes and that may be affected by actions associated with tenant relocation and disposal activities at the CHFb. While social impacts are discussed in this section, a discussion of those impacts that could disproportionately affect minority and low income and youth populations are discussed in Section 3.13, Environmental Justice and Protection of Children’s Health and Safety. A detailed discussion of traffic and roads is included in Section 3.10, Transportation and Traffic.

The data supporting this analysis were collected from standard sources, including federal agencies such as the U.S. Census Bureau, Bureau of Labor Statistics, and Bureau of Economic Analysis; State agencies such as the California Department of Finance; and local agencies such as Orange County and the City of Laguna Niguel’s and Aliso Viejo’s Planning Division and Office of Economic Development. Data are presented for Orange County and compared to the State of California overall, and described for Laguna Niguel as appropriate. The most recent and best available data are presented throughout the section.

3.4.1 Affected Environment

Socioeconomic impacts would be felt predominantly by individuals, residents, and workers in Orange County, particularly residents in areas closest to the CHFb. Nearly all tenant relocation would occur within Orange County. The anticipated maximum number of tenants that would relocate to Los Angeles County (i.e., Long Beach) is 20 (see Chapter 2), representing less than 1 percent of the total number of tenants. Because tenant relocation would occur primarily within the County, minimal to no tenants are anticipated to relocate their residence to adjacent counties (i.e., Los Angeles, San Diego, or Riverside counties). In addition, any construction workforce is anticipated to come from Orange County. Therefore, the ROI for socioeconomic is defined as Orange County, and this analysis focuses primarily on the County and potentially affected communities.

3.4.1.1 Population and Housing

Population

Table 3.4-1 shows past and current population data and future population estimates for Orange County and California. The populations of Orange County and California both increased from 2000 to 2017, but the rate of increase was slightly higher in California. Population growth is expected to continue between 2020 and 2040 at a comparable rate.

Table 3.4-1. Population Growth

Location	Historic and Current Population Growth				Projected Population			
	2000	2010	2017	Change (%) (2000-2017)	2020	2030	2040	Change (%) (2020-2040)
Orange County	2,846,289	3,010,232	3,155,816	10.9	3,257,087	3,431,096	3,555,527	9.2
California	33,871,648	37,253,956	38,982,847	15.1	40,467,295	43,631,295	46,484,933	14.9

Source: USCB 2017a, 2010a, 2000; California Department of Finance 2019

Housing

A housing unit refers to a house; an apartment; a mobile home or trailer; a group of rooms; or a single room occupied as separate living quarters, or if vacant, intended for occupancy as separate living quarters. Both occupied and vacant housing units are included in the total housing unit inventory. A housing unit is classified as occupied if it is the usual place of residence of a person or group of people; a housing unit is classified as vacant if it is not the usual place of residence of a person or group of people. The rental vacancy rate is the proportion of the rental inventory which is vacant and available for rent (USCB 2017b). Table

3.4-2 shows the total housing units, occupied housing units, and rental vacancy rates in Orange County and California. Homeowner vacancy rates are substantially lower, at 0.8 and 1.7 percent for Orange County and California, respectively.

Table 3.4-2. Housing Characteristics (2017)

Location	Total Housing Units	Occupied Housing Units	Rental Vacancy Rate (%)
Orange County	1,081,701	1,024,976	3.2
California	13,996,299	12,888,128	3.6

Source: USCB 2017b

3.4.1.2 Labor

Labor force and employment statistics are presented for Orange County, as that is where the majority of the construction and operation labor force related to activities at the existing CHFB site would be expected to occur, as well as where relocation of the existing CHFB tenants would be expected to occur.

Labor Force

The size of a county’s civilian labor force is measured as the sum of those currently employed as well as unemployed. People are classified as unemployed if they do not have a job, have actively looked for work in the prior four weeks, and are currently available for work (BLS 2015). Table 3.4-3 provides a breakdown of the civilian labor force in Orange County and California. Between 2000 and 2018, Orange County’s labor force grew at a slightly lower rate than the State overall. Orange County added approximately 143,000 people to its labor force during this period, and California added more than 2.5 million to its labor force (BLS 2018, 2010, 2005, 2000).

Table 3.4-3. Civilian Labor Force, 2000-2018

Location	2000	2005	2010	2018	Increase (%) (2000-2018)
Orange County	1,482,303	1,585,916	1,537,187	1,625,426	9.7
California	16,867,808	17,530,064	18,336,271	19,398,212	15

Source: BLS 2018, 2010, 2005, 2000

Unemployment

The unemployment rate is calculated based on the number of unemployed persons divided by the labor force, where the labor force is the number of unemployed persons plus the number of employed persons. Table 3.4-4 provides unemployment data for Orange County and California. Unemployment rates in Orange County were consistently lower than in the State of California in 2000, 2005, 2010, and 2018. From 2005 to 2010, unemployment in Orange County and California increased substantially, which can be attributed to the 2008 economic downturn. Unemployment rates have decreased since 2010, and 2018 unemployment rates were the lowest levels in the last 18 years (BLS 2018, 2010, 2005, 2000).

Table 3.4-4. Unemployment Data for Orange County and California

Year	Orange County	California
2000	3.5	4.9
2005	3.7	5.4
2010	9.7	12.2
2018	2.9	4.2

Source: BLS 2018, 2010, 2005, 2000

Employment by Industry

Table 3.4-5 shows employment by industry in Orange County. In 2018, the two leading industries in the County were professional and business services; and trade, transportation, and utilities. These two industries account for nearly half of total employment in Orange County (CAEDD 2018).

Table 3.4-5. Employment by Industry in Orange County, 2018

Industry	Employment
Professional and Business Services	315,400
Trade, Transportation and Utilities	262,000
Educational and Health Services	225,000
Leisure and Hospitality	222,600
Government	160,800
Manufacturing	159,800
Financial Activities	119,100
Mining, Logging and Construction	106,600 ^a
Other Services	51,100
Information	26,700
Farming	2,000
Total	1,651,100

Source: CAEDD 2018

a 106,100 is for construction

Table 3.4-6 shows the top five employers in Orange County, all who employ 5,000 persons or more. The top two employers are the University of California Irvine and Walt Disney Parks and Resorts, both of which employ more than 10,000 persons. Another 20 companies in the County each employ between 1,000 and 4,999 employees. Twelve of these are associated with the health and medical professions; California State University Fullerton is also included. Of these 20 companies, the employer closest to the CHFB site is the Laguna Woods Village Community Center (senior citizens center) in Laguna Woods, about 4 miles north of Laguna Niguel and the CHFB (CAEDD 2019).

Table 3.4-6. Major Employers in Orange County (2018)

Employer Name	Location	Description/Industry	Employer Size Class
University of California Irvine	Irvine	Schools, universities and colleges / academic	10,000+
Walt Disney parks & resorts	Anaheim	Amusement and Theme Parks	10,000+
Boeing Co Huntington	Huntington Beach	Aircraft Manufacturers / manufacturing	5,000-9,999+
Broadcom Corp	Irvine	Semiconductors and related devices / manufacturing	5,000-9,999
Mflex	Irvine	Electronic equipment and supplies / manufacturing	5,000-9,999

Source: CAEDD 2019

3.4.1.3 Earnings

Earnings are discussed in this section using per capita personal income (PCPI) and compensation by industry.

Per Capita Personal Income

Personal income data are measured and reported for a worker’s county of residence. PCPI is the personal income for county residents divided by the County’s total population. Table 3.4-7 contains 2000, 2005, 2010, and 2018 annual PCPI data for both Orange County and California. All dollar estimates are in current dollars (not adjusted for inflation). In general, the PCPI was slightly higher in Orange County during the entire period, however, California’s PCPI grew faster than Orange County’s from 2000 to 2018.

Table 3.4-7. Annual Per Capita Personal Income in Orange County and California (in dollars)

Location	Per Capita Personal Income				Percent Change (2000-2018)
	2000	2005	2010	2018	
Orange County	\$38,144	\$47,377	\$49,740	\$69,268	81.6
California	\$33,403	\$39,326	\$43,609	\$63,557	90.3

Source: BEA 2019a, 2019b

Industry Compensation

Compensation data are measured and reported for the county of work location and are typically reported on a per job basis. Compensation data indicate the wages and salaries for work done in a particular place (e.g., a county), but if the worker does not live in the county where the work occurred (e.g., a person from a neighboring county crosses county lines to go to work) then a sizeable portion of the wages/salaries would be spent elsewhere. These expenditures would not remain in or flow back into that county’s economy. Total compensation includes wages and salaries as well as employer contribution for employee retirement funds, social security, health insurance, and life insurance. The term “Total Industry Compensation” is often used in economic data to describe this data, and is presented to characterize the scale of business activity performed in Orange County.

Total industry compensation in Orange County for 2018 was approximately \$137 billion, making it the third largest county in California. Total compensation in the State in 2018 was over \$1.5 trillion. The government (federal, state, and local) and manufacturing are the two largest employers in Orange County, accounting for approximately 12 (\$16.5 billion) and 12.4 percent (\$17 billion), respectively, of total employee compensation. Of the government employees, nearly 72 percent are found in local government. Federal workers received compensation of just over \$1.3 billion, or 1 percent of total employee compensation in Orange County. Other large sectors include health care and social assistance, finance and insurance, construction, wholesale and retail trade. These sectors along with the government and manufacturing sectors account for nearly 62 percent of the total compensation to employees in Orange County in 2018 (BEA 2018).

3.4.1.4 Local Economy of Laguna Niguel and Surrounding Communities

The local economy of Laguna Niguel employs approximately 33,700 people, compared to 28,346 and 16,879 employees employed in Aliso Viejo and Laguna Hills, respectively. Households in Laguna Niguel and Laguna Hills had similar median household incomes of \$99,206 and \$99,797, respectively, in 2017, while the median household income in Aliso Viejo was slightly higher at \$106,353. These are all higher than the household median income in Orange County (\$81,851), California (\$67,169), and across the entire United States (\$61,937) (USCB 2017c). The largest industries and highest paying industries overlap in all three communities, although in slightly different order, as follows (Datausa 2020):

Top industries:

- **Laguna Niguel:** Health Care and Social Assistance (4,562), Professional, Scientific, & Technical Services (4,110), and Retail Trade (3,447)
- **Aliso Viejo:** Professional, Scientific and Technical Services (4,098), Health Care and Social Assistance (3,103), and Retail Trade (3,077)
- **Laguna Hills:** Health Care and Social Assistance (2,348), Retail Trade (2,348) and Professional, Scientific and Technical Services (1,994)

Highest paying industries:

- **Laguna Niguel:** Management of Companies and Enterprises (\$103,846), Manufacturing (\$100,045), and Finance & Insurance (\$96,351)
- **Aliso Viejo:** Utilities (\$119,185), Manufacturing (\$90,882), and Information (\$87,697)
- **Laguna Hills:** Finance and Insurance (\$91,991), Real Estate, Rental & Leasing (\$90,846) and Utilities (\$87,292)

The top employers in Laguna Niguel are the U.S. Government (approximately 6.3 percent of total City employment), Costco (approximately 1.8 percent) and Capistrano United School District (approximately 1.1 percent) (City of Laguna Niguel 2017).

3.4.1.5 Community Services

Recreational Facilities

Orange County includes several recreational opportunities, including more than 15 regional parks, wilderness parks, a nature preserve, regional trails, golf courses, and beaches (OC Parks 2020a). The El Lazo Basketball Courts are located on the CHFB site and are leased to the City of Laguna Niguel. Recreational areas closest to Laguna Niguel include Laguna Niguel Regional Park, located immediately south of the CHFB across Aliso Creek Road (approximately 1,000 feet from the site). This park consists of 227 acres and a 44-acre lake, and provides a wide variety of recreational uses, including lake fishing, volleyball and tennis courts, jogging and bicycle trails, barbeque/fire rings, picnic shelters, an amphitheater and a scenic overlook (OC Parks 2020b). Over one-third of the total land area within the City is devoted to

open space. A combination of regional parks, community parks, neighborhood parks, private recreation facilities, open space corridors, greenbelts and landscaped slope banks are scattered throughout the City and help establish its open space character. The City has access to over 5,000 acres of open space, extending beyond the City limits to include Aliso and Wood Canyons Regional Park and the Salt Creek Regional Park (within 2 miles to the west of the CHFEB, in Aliso Viejo). Aliso Viejo Community Park and the Aliso Creek hiking and biking trails are located immediately west of the CHFEB, just on the other side of the Alicia Parkway. Other nearby recreational areas between 5 and 10 miles from the CHFEB include Laguna Beach, Laguna Coast Wilderness Park and Crystal Cove State Park.

Proximity to nature can influence where people choose to live and how much people are willing to pay for housing (i.e., property values). Research indicates that people make regional housing and labor market decisions based in part on the availability of and proximity to public lands, such as state parks, national forests, and recreational lakes and rivers. Living near public lands provides amenities such as convenient access to recreation and wildlife viewing. Population movement and migration into environmentally desirable areas can also be explained by the presence and density of natural landscapes (e.g., rivers and mountains) and the associated environmental amenities such as clean air (Garber-Yonts 2004; Hand et al. 2008).

Police, Fire, and Healthcare Services

The Southwest Operations Division of the Orange County Sheriff's Department provides law enforcement services to approximately 305,000 residents within Aliso Viejo, Dana Point, Laguna Hills, Laguna Niguel, Laguna Woods, San Clemente, and San Juan Capistrano. The division employs approximately 256 staff, of which 219 are Deputy Sheriffs, and deploys approximately 125 patrol cars each 24-hour period (Orange County Sheriff's Department 2020).

The Cities of Laguna Niguel and Aliso Viejo partner with the Orange County Fire Authority for fire and emergency medical services. The Orange County Fire Authority provides comprehensive emergency services to residents near the CHFEB site through a regional approach. The Operations Department is comprised of 7 divisions and eleven battalions that include 79 fire stations (5 to 10 stations per battalion) that provide regional emergency response to all fires, medical aids, rescues, hazardous material incidents, wildland fire, aircraft fire and rescue services to John Wayne Airport, and other miscellaneous emergencies. Division 5 serves the project area, including the cities of Aliso Viejo, Laguna Hills, Laguna Niguel, Laguna Woods, and Lake Forest. Fire Stations 4, 39 and 49 serve the Laguna Niguel area; station 57 covers adjacent Aliso Viejo (Orange County Fire Authority 2020).

The closest hospitals to the CHFEB site include Mission Hospital, Saddleback Memorial Hospital, and South Coast Medical Center, all within 5 miles of the CHFEB. Mission Hospital is a state-of-the art, 523-bed acute care hospital in Mission Viejo, California (Providence 2020).

Schools

The CHFEB site is located within the Capistrano Unified School District, which encompasses 200 square miles and includes 63 campuses and over 47,000 students. The District includes all or parts of the following cities and a portion of the unincorporated area of Orange County: San Clemente, Dana Point, San Juan Capistrano, Laguna Niguel, Aliso Viejo, Mission Viejo, and Rancho Santa Margarita; and the communities of Las Flores, Coto de Caza, Dove Canyon, Ladera Ranch, Sendero/Rancho Mission Viejo and Wagon Wheel (Capistrano Unified School District 2020).

Eleven elementary schools, three middle schools and two high schools serve the Laguna Niguel and Aliso Viejo area. Saddleback College is a community college located a few miles from the CHFEB in Mission Viejo (Laguna Niguel Schools 2020). Four schools are located within 0.5 mile of the CHFEB, including Laguna Niguel Elementary School to the east, Wood Canyon Elementary School and Aliso Niguel High School immediately to the west in Aliso Viejo, and St. Mary's School located to the southwest.

3.4.2 Environmental Consequences

To evaluate the impacts on socioeconomic resources, the alternatives were reviewed for their potential to cause the following:

- Alters local economies;
- Changes housing characteristics (types of units, occupancy, housing values, etc.) or residential development patterns;
- Alters population growth or demographic patterns
- Displaces populations, residents, or businesses to accommodate construction;
- Requires an amount of public or private resources (time and/or money) that interferes with the performance of other local government functions or the viability of proposed projects; or
- Induces growth without adequate supporting community services (e.g., education, public health and safety)

A significant adverse impact to socioeconomics would occur if the action would result in:

- Alters local economies on a substantial basis without the capacity to absorb a decrease or increase;
- Changes housing characteristics or residential development patterns in a substantial way;
- Places a demand on suitable housing that exceeds availability;
- Alters population growth or demographic patterns in ways that change the overall character of communities;
- Requires an amount of public or private resources (time and/or money) that substantially interferes with the performance of other local government functions or the viability of proposed projects; and
- Induces growth that exceeds the capacity of supporting community services, including:
 - Change in the number of users of community services that exceed existing capacity;
 - Change in the demand for emergency and public protection services that would increase response times based on existing personnel resources and equipment; and
 - Change in the funding needed to sustain services or to increase access to services.

3.4.2.1 *No Action Alternative*

Under the No Action Alternative, GSA would not construct a new USCIS building or relocate tenants to new offsite locations. Ongoing maintenance to the CHFEB would occur, but there would be no adverse impacts on socioeconomic resources. Socioeconomic benefits of approximately 3,000 government jobs remaining within the Laguna Niguel community and the associated income, spending, and tax revenue would continue.

3.4.2.2 *Alternative 1*

Construction

There would be short-term, minor, beneficial direct impacts during construction under Alternative 1. Construction of the new USCIS building would create between 15 and 35 jobs during an estimated 30-month construction period, and up to 300 jobs during a peak construction period of 15 months. It is anticipated that the majority of construction workers for the new building would be local and commute daily to the CHFEB site from their current residences within Orange County and surrounding counties. As such, no direct impacts on population, housing, or community services are anticipated. Construction would

have a short-term, negligible, and beneficial impact on unemployment and income in Laguna Niguel and communities associated with tenant relocation sites throughout Orange County. There could be moderate, long-term impacts to recreational facilities as the El Lazo Basketball Courts would close permanently during construction.

Short-term, negligible to minor, beneficial indirect economic effects are anticipated from an increase in wages and local spending by construction workers in Laguna Niguel and communities associated with tenant relocation sites throughout Orange County. Construction of a new USCIS building and leasing of space for approximately 1,000 tenants elsewhere in Orange County would cost approximately \$403 million, which includes labor, material, overhead, profit, and design fees. For other similar projects, labor costs are generally two thirds the sum of labor and materials, excluding overhead and profit (GSA 2020b). For purposes of this analysis, it is assumed that at least a portion of materials and equipment would be purchased from local vendors, which would have beneficial impacts on local businesses in the short term. In addition, an increase in economic activity could occur from local spending in the community by the construction workforce (e.g., retail, food service, entertainment, etc.). Associated spending would result in increased tax revenue for the local, state, and federal government, resulting in minor beneficial impacts.

Operation

There would be long-term, adverse and beneficial direct impacts during operations. Following construction, approximately 2,000 USCIS staff currently located at the CHFB would move into the new onsite facility while the remaining approximately 1,000 tenants would relocate to existing offsite lease space within Orange County as discussed in Chapter 2. Specific office locations of the relocated tenants have not been identified, but it is assumed at least 55 percent of the remaining tenants would relocate in south or central Orange County no farther north than Irvine, with as many as 45 percent of the remaining tenants relocating to areas north of Irvine such as Santa Ana, Anaheim, or Long Beach. It is also assumed that the large majority of the relocated tenants would retain their current residence and instead change their daily commute time (either lengthening or shortening the commute depending on the new office location). Therefore, negligible impacts on population, housing, community services, and recreational facilities are anticipated. New office space for relocated tenants would likely be located across multiple locations throughout the County, and potential impacts on socioeconomic resources in a given community from a small influx of relocated workers would be minor and beneficial due to increased spending and income in that community.

The shift of approximately 1,000 jobs out of the project area would have a moderate adverse impact on the local Laguna Niguel economy. This represents an approximate 3 percent reduction in jobs in the City. This could adversely impact local businesses and vendors due to decreased spending, which could result in a decrease in jobs at area businesses due to lower economic activity in surrounding communities. However, as previously indicated, workers are not expected to change their current residence, so decreases in spending would be associated with spending during normal business hours. Regardless, Alternative 1 would likely result in a noticeable change to the local economy in Laguna Niguel. Potential future use of the remaining land to be transferred out of federal ownership and potential associated socioeconomic impacts are considered in the Future Redevelopment section.

Following disposal of the remaining 64.85-acre parcel, long-term, minor and beneficial impacts could occur from an increase in tax revenue if the land is transferred out of federal ownership, as the remaining parcel would become taxable land. This would result in a slight increase in tax coffers collected by local, state, and federal governments.

Future Redevelopment

Under a renovation scenario, short-term, minor indirect impacts may occur during the construction period. A small and local construction workforce would likely be required for renovations which would not likely result in any temporary increases in population as workers would be expected to commute from within the region. As a result, there would likely be no impacts on housing, community services, or recreational

facilities in Laguna Niguel or the surrounding region. There could be short-term, minor, beneficial impacts during construction due the temporary increase in jobs and associated spending in the local economy, similar to as described for construction of the USCIS building under Alternative 1.

During operations of a renovation scenario, it is assumed a similar number of employees could occupy the renovated structure as compared to current occupancy levels of the CHFB (i.e., up to 3,000 workers). When considered with the 2,000 USCIS employees to remain on site, this would represent a net increase of up to 2,000 additional employees on site. It is unknown to what extent future tenants would relocate to areas near Laguna Niguel, and such relocation would ultimately depend on future use of the new development. Considering the average family size of 3.52 and that up to 739,052 households (72.1 percent) have children in Orange County (USCB 2017d), an increase in 3,000 workers could result in an increase in population of up to 7,614 individuals, which would represent a 0.2 percent increase population in Orange County (based on 2017 population data). This represents an upper bound estimate, as the majority of new workers would be anticipated to live within the local community.

Under a worst-case scenario where all workers and their families relocate to communities within Laguna Niguel and adjacent communities (i.e., Aliso Viejo, and Laguna Hills), moderate to significant adverse socioeconomic impacts could occur due to increased demands on housing, community services, and recreational facilities. Vacancy rates are low within the community, and an increase in new workers and families could result in an increased demand on housing stock; placing a demand on suitable housing that exceeds availability. Vacant units (rental and for sale) in the communities of Laguna Niguel, Aliso Viejo and Laguna Hills totaled 3,322 units in 2017 (USCB 2017b). The impact on these local communities could be potentially significant if most or all the workers chose to live in these three communities, although if any new development included residential housing, that could help increase the local housing supply and offset some adverse impacts. If workers relocate further from these communities within Orange County, the impacts may be much smaller, but could still be minor to moderate, depending on relocation decisions. Orange County had 56,272 vacant units in 2017; residences for 3,000 new workers and their families would represent approximately 5.3 percent of the vacant housing units in the County and result in a minor to moderate impact on the housing supply. Increased demands could also be placed on fire and police response times, and student-to-teacher ratios in schools may increase. In addition, moderate beneficial socioeconomic impacts could occur due to the increase in income and spending in the local community and associated tax revenue. Increased tax revenues could be utilized to offset increased strains on community services and recreational facilities by funding enhancements to appropriate services and facilities.

Under a demolition/new construction scenario, minor temporary indirect impacts may occur from demolition of the existing CHFB and new construction on the remaining 64.85-acre parcel to be disposed. Under this scenario, impacts would likely be similar to those described for construction of the new USCIS building, but could be to a greater intensity as development could be on a larger scale and likely extend for a longer period of time. A larger construction workforce may be required for the redevelopment compared to the workforce needed for construction of the USCIS building, and there is potential that a small number could relocate nearby, with families. This could result in short-term, minor adverse impacts on the local housing supply, community services, and recreational facilities. New construction could also generate short-term, minor beneficial impacts to the local economy, similar to those described for the new USCIS building construction.

Impacts during operations of a demolition/new construction scenario would likely be similar to as described for operations of the renovation scenario, but to a larger extent and intensity. Future development of the site is currently unknown and would be dictated by the future owner of the site. As a result, the number of new workers that could be based at the site is unknown, as is the extent to which commercial or residential uses may occupy the site. Development of a mixed-use space with commercial and residential uses could have minor to significant socioeconomic impacts, depending on the size and scope of development. Adverse impacts could occur due to increase strains on housing stock, community services, and recreational facilities, similar to as described for the renovation scenario and depending on the extent to which workers

relocate. Beneficial impacts could occur due to increased jobs, tax revenue, income, and potentially the housing stock, depending on the number of housing units incorporated into the development. Increased tax revenues could be utilized to offset increased strains on community services and recreational facilities by funding enhancements to appropriate services and facilities. In the longer term, any future redevelopment could create new jobs and attract new workers that could help offset, to some extent, the adverse economic effects associated with relocation of the existing CHF B workforce.

Follow-on NEPA or CEQA analyses may be required (depending on who acquires the site) for any proposed redevelopment plans presented by a future developer, to include further consideration of socioeconomic impacts.

3.4.2.3 Preferred Alternative (Alternative 2)

Under the Preferred Alternative, there would be short-term, negligible to minor beneficial socioeconomic impacts during construction while existing lease spaces are built-out to accommodate approximately 3,000 tenants. Beneficial impacts would occur from temporary increases in income and spending by construction workers in the local communities near where buildouts would occur, as well as from the increase purchasing of materials in the region. Impacts would be distributed across communities dependent upon the final relocation spot for tenants. Beneficial impacts would be greatest near the selected location for USCIS, which is likely to occur in the northern part of Orange County (e.g., Irvine, Santa Ana or Anaheim). No impacts on housing stock, or community services are anticipated. Similar to Alternative 1, the El Lazo Basketball Courts would close under the Preferred Alternative, resulting in moderate impacts to recreational facilities.

During operations of the Preferred Alternative, there could be moderate to significant impacts to the local economy of Laguna Niguel due to the relocation of 3,000 employees to other communities within the County. It is assumed that because office relocation would occur within the County, the large majority of the relocated tenants would change their daily commute in order to retain their current residence. Therefore, there would be no impacts to housing or population, minimal impacts on recreational facilities, and the economic benefits related to tenant's place of residence would remain unchanged. Socioeconomic benefits of an increased workforce would shift to other communities within Orange County where relocation would occur, resulting in beneficial direct and indirect impacts to those communities through increased spending. The CHF B is the largest employer in Laguna Niguel, and relocation of tenants would represent an approximately 9 percent decrease in total workforce in the City, and a 3.8 percent decrease in the total workforce within the three-community area (i.e., 78,925 employees in Laguna Niguel, Aliso Viejo and Laguna Hills combined). This could have a substantial and potentially significant impact on the City of Laguna Niguel and its ability to absorb the 9 percent workforce loss, and a moderate adverse impact on local businesses and vendors in the three-city community due to long-term decreases in spending. The decrease in spending could result in a decrease in jobs at local businesses, reductions in local sales tax revenue (which generated 25.9 percent of revenue for the City of Laguna Niguel in 2017), and overall reduction in local economic activity. The loss of 3,000 jobs would also represent an approximate 6.3 percent decrease in local per capita income for Laguna Niguel (2017 dollars), similar to the analysis for Alternative 1; however, decreases in spending would also be associated with spending during normal business hours. In addition, assuming that relocated workers would maintain their current residence, property tax revenue generated by workers residing in the local communities would not change; property taxes generate the largest revenue for all three cities. Regardless, the Preferred Alternative would likely result in a substantial change to the local economy of Laguna Niguel and the surrounding communities. Potential future use of the remaining land to be transferred out of federal ownership and potential associated socioeconomic impacts are considered in the Future Redevelopment section.

Following disposal of the 92-acre site, long-term minor beneficial impacts could occur from an increase in tax revenue if the land is transferred out of federal ownership, as the remaining parcel would become taxable land. This would result in a slight increase in tax coffers collected by local, state, and federal governments.

Future Redevelopment

Under both a renovation/new construction and demolition/new construction scenario, minor to significant indirect impacts could occur from increased demands on housing, community services, and recreational facilities from a potential population influx of new workers and their families, as well as beneficial impacts due to increased jobs, income, and tax revenue. Impacts during construction and operation would likely be similar to as described under Alternative 1 Future Redevelopment (demolition/new construction scenario), and would be dependent upon the size and scope of new development to occur on the parcel. Impacts could be to a greater extent and intensity under a demolition/new construction scenario, depending on the scale of new development. In the longer term, any future redevelopment may create new jobs and attract new workers that could help offset, to some extent, the adverse economic effects associated with relocation of the existing CHFb workforce.

Similar to Alternative 1, follow-on NEPA or CEQA analyses may be required (depending on who acquires the site) for any proposed redevelopment plans presented by a future developer, to include further consideration of socioeconomic impacts.

3.4.2.4 Impact Reduction Measures

No impact reduction measures would apply for Socioeconomics under the Proposed Action.

3.5 GEOLOGY, SEISMICITY, AND SOILS

Geological resources consist of the Earth's surface and subsurface materials. These resources are typically described in terms of geology, topography, soils, and geologic hazards. Geology is the study of the Earth's physical structure and composition, as well as the configuration of the surface and subsurface features. Topography describes the general shape and arrangement of the natural and artificial physical features of a land surface. Soils are the unconsolidated material overlying bedrock, and are typically described in terms of type, slope, and physical characteristics (e.g., structure, permeability, strength, and erosion potential). Geologic hazards are natural geologic events that can endanger human lives and threaten property. Examples of geologic hazards include earthquakes and landslides.

3.5.1 Affected Environment

The ROI for geological resources focuses on the 92-acre CHFB site. The CHFB site has been previously disturbed and developed and contains mostly paved surfaces and landscaped areas. Undeveloped lots comprised primarily of gravel are located on the southern end of the site and maintained landscaped areas comprised of native and non-native vegetation surround the building.

The ROI for geology, seismicity, topography, and soils does not include regional conditions outside of the 92-acre CHFB site as it is assumed off-site leased office space would be located in previously developed areas, and any necessary build out would not require new ground disturbance. As a result, no impacts to geology, seismicity, topography, or soils would occur from this action outside of the 92-acre CHFB site. Off-site leasing of new office space would be conducted at locations that meet current and applicable California Building Code and ASCE standards related to geologic hazards.

3.5.1.1 Geology

The geology of the region consists of rugged mountains, with the CHFB site residing within the Peninsular Ranges Geomorphic Province, which is characterized by a series of mountain ranges separated by long valleys trending northwest. The underlying layers are granite rocks intruding older metamorphic rocks. The Province extends approximately 920 miles from the Los Angeles Basin to the southern tip of Baja California and varies in width from approximately 30 to 100 miles (CGS 2015).

3.5.1.2 Seismicity

Southern California is a seismically active area with many active faults. An active fault is one that has ruptured in the last 11,000 years (CGS 2019). There are no known active faults within or adjacent to the CHFB site. The closest active faults are a segment of the Newport-Inglewood-Rose Canyon fault zone, located off the Pacific Coast approximately 4 miles southwest of the CHFB, and a segment of the Pelican Hill fault, located approximately 4 miles west of the CHFB. A pre-Quaternary fault lies underneath the CHFB site. A pre-Quaternary fault is a fault older than 1.6 million years or a fault without recognized Quaternary displacement (CGS 2010).

The United States Geological Survey produces seismic hazard maps based on the rate at which earthquakes occur in a given area and the distance shaking extends from the source. A hazard map shows the level of horizontal shaking that has a 2 percent chance of being exceeded in a 50-year period. Shaking is expressed as a percentage of the force of gravity (percent g). A rating of 10 to 20 percent g is considered to cause moderate damage, and major damage could occur at values greater than 20 percent g. The 2014 Seismic Hazards Map shows that the ROI has a seismic hazard rating of 50 percent g, which could be subject to major damage (USGS 2015a).

The California Department of Conservation created the California Earthquake Hazards Zone Application to determine where earthquake hazard zones are located. Earthquake hazard zones define areas subject to three distinct types of geologic ground failures: fault rupture (where the surface of the earth breaks along a fault); liquefaction (when the soil temporarily turns to quicksand and cannot support structures) and earthquake-induced landslides. According to the California Earthquake Hazards Zone Application, the

CHFB site is not within a fault zone, but does have the potential to experience strong ground shaking from the occurrence of earthquakes centered on nearby faults and more distant regional faults. The CHFB site is within the San Juan Capistrano liquefaction zone (CGS 2019). Liquefaction is mostly confined to the alluvial sediments situated within the floodplain of Aliso Creek.

3.5.1.3 Topography

The CHFB site ranges in elevation from approximately 160 to 240 above mean sea level (USGS 2015b). Topography generally slopes downward from north to south. The central and southern portion of the site has been graded and is on relatively flat terrain, although the CHFB is built into a hillside and some steep slopes are present on the north end of the site.

3.5.1.4 Soils

Soil is a collective term for the inorganic and organic substrate covering bedrock in which vegetation grows and a multitude of organisms reside. Soils are surveyed nationwide by county. Soil resources provide a foundation for both plant and animal communities by establishing a substrate for plant growth and vegetative cover for animal habitat and feeding.

Soil associations at any given site are determined by five factors: 1) physical and mineralogical composition of the parent material; 2) climate under which the soil material accumulated and has existed since accumulation; 3) plant and animal life atop and within the soil; 4) topography, or the “lay of the land”; and 5) length of time that these forces of soil formation have acted on the parent material (NRCS 2019a).

Based on Natural Resource Conservation Service soil survey data, there are eight soil associations historically associated with the CHFB site (NRCS 2019b). The majority of the site is mapped as Bosanko clay, 15 to 30 percent slopes² (54 percent) or Sorrento loam, 2 to 9 percent (22 percent). The soils mapped within the CHFB site are described below and shown in Figure 3.5-1:

- **Bosanko clay, 15 to 30 percent slopes:** Well-drained soils with very slow infiltration rates. The parent material of Bosanko clay is acid residuum weathered from igneous rock. These soils are typically found on hill slopes.
- **Calleguas clay loam, 50 to 75 percent slopes, eroded.** Well-drained soils with very slow infiltration rates. The parent material of Calleguas clay loam is residuum weathered from calcareous shale. These soils are typically found on hill slopes.
- **Capistrano sandy loam, 2 to 9 percent slopes.** Well-drained soils with moderate infiltration rates. The parent material of Capistrano sandy loam is alluvium derived from granite. The soils are typically found in alluvial fans and are classified as prime farmland if irrigated.
- **Myford sandy loam, 9 to 30 percent slopes, eroded.** Moderately well-drained soils with very slow infiltration rates. The parent material of Myford sandy loam is alluvium derived from sandstone. These soils are typically found on terraces.

² The slope range for each soil type is expressed as a percentage of the distance between two points. A higher slope range can increase erosion potential in a particular area. A 0 to 2 percent slope gradient is considered nearly level, a 2 to 9 percent is considered nearly level to moderately sloping, and a 50 to 75 percent slope gradient is considered a very steep slope.

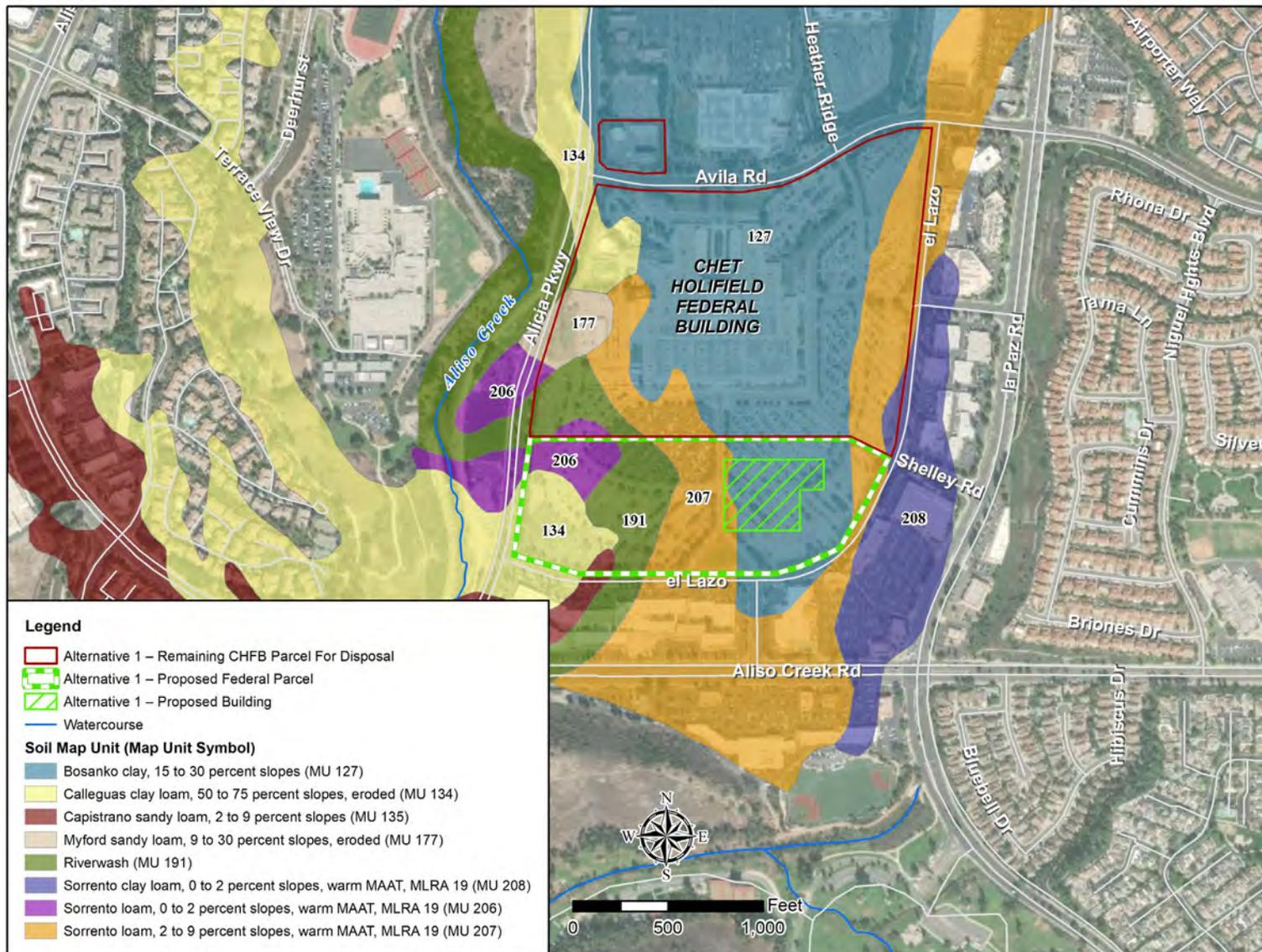


Figure 3.5-1. Soils at the CHFB Site

- **Riverwash.** Well-drained soils with very slow infiltration rates. The parent material of Riverwash is sandy and gravelly alluvium. These soils are typically found in alluvial fans.
- **Sorrento clay loam, 0 to 2 percent slopes.** Well-drained soils with moderate infiltration rates. The parent material of Sorrento clay loam is alluvium derived from sedimentary rock. These soils are typically found in alluvial fans and are classified as prime farmland if irrigated.
- **Sorrento loam, 0 to 2 percent slopes.** Well-drained soils with moderate infiltration rates. The parent material of Sorrento loam is alluvium derived from sedimentary rock. These soils are typically found in alluvial fans and are classified as prime farmland if irrigated.
- **Sorrento loam, 2 to 9 percent slopes.** Well-drained soils with moderate infiltration rates. The parent material of Sorrento loam is alluvium derived from sedimentary rock. These soils are typically found in alluvial fans and are classified as prime farmland if irrigated.

However, as shown in Figure 3.5-1, the majority of the site consists of developed areas and has been previously disturbed from past development. Of the 92-acre site, approximately 59 acres are developed or paved (i.e., buildings, roads, or parking areas) and approximately 18 acres are landscaped. Approximately 15 acres on the outermost southern and western portions of the site consists of undeveloped gravel lots. As discussed in Section 3.5.1.3, the central and southern portion of the site (approximately 63.5 acres) has been graded and is on relatively flat terrain. Some steep slopes exist on the north end of the site near Avila Road.

3.5.2 Environmental Consequences

Impacts on geological resources would be considered significant under the following conditions:

- geological structures that control groundwater quality are altered;
- people or structures are exposed to potential substantial adverse effects from a geologic hazard (i.e., on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse);
- if soil erosion produces substantial gullyng, extensive damage to vegetation, or a sustained increase in sedimentation in streams;
- if there is a substantial loss of soil, and/or a substantial decrease in soil stability and permeability;
or
- if soils are substantially disrupted, displaced, compacted or covered over.

Except when installing impermeable surfaces, generally adverse impacts on geological resources can be avoided or minimized if proper construction techniques and erosion-control measures are incorporated into project development.

3.5.2.1 No Action Alternative

Under the No Action Alternative, GSA would not construct a new USCIS building or relocate tenants to new offsite locations. Ongoing maintenance to the CHFB would occur, which could generate negligible amounts of land disturbance and soil erosion from ongoing maintenance activities. No impacts to geology or topography would occur. The CHFB would continue to be at risk for seismic disturbance as it is not currently constructed to California Building Code for seismic safety.

3.5.2.2 Alternative 1

Construction

Geology

Alternative 1 would have minor direct impacts on geology during construction within the 27.15-acre parcel to be retained. Construction of a new USCIS building would require excavation; however, the depth of

excavation is currently unknown and would depend on the results of the geotechnical investigation and engineering report to be prepared for the development in accordance with GSA Facilities Standards for the Public Buildings Service (P-100) and current California Building Code. This could involve some disturbance or modification of the surficial geology, but impacts are anticipated to be within a depth comparable to the past construction of the existing CHFb and commercial development adjacent to the site. See Section 3.8, Water Resources for a discussion on groundwater quality.

Seismicity

Construction of a new USCIS building would result in beneficial impacts related to seismic hazards. New construction would reduce the potential for adverse effects, including the overall threat of loss of life and property, to federal tenants from seismic hazards. The CHFb was constructed in 1971 and was designed to less stringent standards than are currently required, as documented in seismic evaluations prepared for the site (Degenkolb Structural Engineers 2006, 2017). As described under Geology, a geotechnical investigation and engineering report would be prepared for the development that would further characterize geologic hazards and specify site-specific construction requirements related to seismicity. Prior to initiating construction, a grading permit would be obtained from the City of Laguna Niguel for building pad certification.

Topography

Alternative 1 would have negligible direct impacts on topography. Within the 27.15-acre parcel to be retained, existing pavement and parking infrastructure would be removed, and the site would be graded as necessary. As this portion of the site is relatively flat, the grading of soils would be minimal, and topography would not change substantially from current conditions.

Soils

Alternative 1 would have minor direct impacts on soils. A total 27.15 acres of previously disturbed soils would be impacted during construction of the new USCIS building. Of the 27.15 acres, 13.4 acres are existing gravel lots, 10.5 acres are existing paved areas (i.e., roadways), and 3.25 acres are existing landscaped areas. The use of heavy equipment for site preparation for construction of buildings, roads/walkways, parking areas and other infrastructure under Alternative 1 would require grading, excavation, and filling; however, these actions would occur in areas where soils have been previously disturbed. If any natural soil horizons exist, they would likely be lost during construction. Heavy equipment may compact or loosen and destroy the structure and function of organic and mineral soils over the long term, reducing soil moisture and most likely resulting in increased runoff and erosion. Soil erosion from use of heavy equipment could also occur as a result of ground disturbance, leading to detachment of soils and transport of freshly disturbed surfaces in wind and stormwater runoff. Soil productivity (i.e., the capacity of the soil to produce vegetative biomass), would remain largely unchanged, considering the parcel has been previously disturbed.

The project would be subject to the California Stormwater Construction General Permit, which specifies measures for stabilizing soils at the CHFb site and minimizing soil loss during construction (see Section 3.8, Water Resources). Compliance with the terms of this permit would limit impacts from soil erosion during construction.

Operations

No impacts to geology or topography are anticipated during operations of Alternative 1, either from operations of the new USCIS building or from off-site leasing of new office space in locations throughout the region.

Long-term negligible direct impacts would be associated with loss of soil structure and function as a result of covering soils with concrete, asphalt, and other impermeable surfaces. Soils at the site have been previously disturbed from historical site use. Additionally, the majority of the site is already either

impervious or semi-impervious gravel lots, and new construction would represent a marginal increase in impervious surfaces that could contribute to increased potential for water runoff and soil erosion. New development would be required to comply with the terms of the City of Laguna Niguel new development stormwater requirements, which specifies design requirements that would limit runoff from the site (see Section 3.8, Water Resources). Compliance with these development standards would limit impacts from soil erosion over the long term.

There would be no impacts to geology, topography, seismicity, or soils from disposal of the remaining 64.85 acres of the CHFB site.

Future Redevelopment

Under a renovation scenario, adverse indirect impacts could occur from renovation of the existing CHFB on the remaining 64.85-acre parcel to be disposed. No indirect impacts to geology or topography are expected under construction or operations, but there could be minor indirect impacts to soils during construction. Under this scenario for Alternative 1, no new structures are anticipated, but there could be minor temporary impacts to soils near the CHFB while improvements are made to the structure, particularly those to bring the building up to current California Building Code seismic standards (Degenkolb Structural Engineers 2006, 2017). Some earth work could be required to fortify the building foundation, resulting in potential for soil disturbance, compaction, and erosion. However, best management practices could be utilized to stabilize soils to prevent erosion and runoff. Renovations may result in beneficial impacts to seismic hazards as the threat of loss of life and property to tenants from seismic hazards is reduced.

No indirect impacts to geology, topography, or soils are anticipated during operations of a renovation scenario. New development may be required to comply with the terms of the City of Laguna Niguel new development stormwater requirements, which would limit impacts from soil erosion over the long term (see Section 3.8, Water Resources).

Under a demolition/new construction scenario, indirect impacts could occur from demolition of the existing CHFB and new construction on the remaining 64.85-acre parcel to be disposed. Under this scenario, there could be moderate indirect impacts to geology, topography, and soils during construction. Impacts would likely be similar to as described for construction of the new USCIS building but could be to a greater intensity as development could occur over a larger area and to a greater extent. Excavation could be required, which could affect geological horizons depending on overall excavation depth. Some steep slopes are present throughout the northern portion of the site, and depending on future development plans, additional grading may be required that could change the topography of the site. Most of the site consists of existing impervious surfaces or previously disturbed areas, although up to 64.85 acres could be impacted during construction. Impacts could also include additional ground disturbance, grading, and earth work from demolition activities of the existing CHFB. The potential for wind and water erosion and soil loss during construction could be greater, considering the presence of steep slopes. New construction may be subject to the terms of the California Stormwater Construction General Permit, similar to as construction for the new USCIS building, which would limit impacts from soil erosion during construction (see Section 3.8, Water Resources). Any new construction would likely be built to current California Building Code, which would decrease overall seismic risk and result in beneficial indirect impacts.

No indirect impacts to geology or topography are anticipated during operations of a demolition/new construction scenario. Long-term, minor, and adverse indirect impacts could be associated with new development and an increase in impervious surfaces, similar to as described for operations of the new USCIS building, but to a larger extent depending on the size of development. New development may also be required to comply with the terms of the City of Laguna Niguel new development stormwater requirements, which would limit impacts from soil erosion over the long term (see Section 3.8, Water Resources).

Follow-on NEPA or CEQA analyses may be required (depending on who acquires the site) for any proposed redevelopment plans presented by a future developer, to include further consideration of excavation, as well as soil erosion prevention and stormwater management, once final development plans are completed.

3.5.2.3 Preferred Alternative (Alternative 2)

Under the Preferred Alternative, there would be no impacts to geology, topography, or soils during construction or operations. All tenants would be removed from the CHFb and no construction would occur at the site. Off-site leasing of new office space may require office buildouts; however, these buildouts would not require ground disturbance, and no impacts to geologic resources would occur. Off-site leasing of new office space would be conducted at locations that meet California Building Code and ASCE standards related to geologic hazards, which would minimize the threat of loss of life and property to federal tenants from seismic hazards. Therefore, there would be long-term beneficial direct impacts to seismic hazards. There would be no change to geology, topography, seismicity, or soils following disposal of the 92-acre site.

Future Redevelopment

Under a renovation/new construction scenario, indirect impacts could occur from renovation of the existing CHFb, and from new construction on the south or west end of the 92-acre site to be disposed. Under this scenario for the Preferred Alternative, there could be minor indirect impacts to geology, topography and soils during construction. Minor impacts from land disturbance and earth work in the area around the CHFb could occur as the building is renovated, similar to as described for Alternative 1 Future Redevelopment (renovation scenario). In addition, there could be new construction on the south or west end of the site, resulting in similar, minor impacts as described for construction of the new USCIS building under Alternative 1. Renovation and new construction would likely be done in accordance with current California Building Code and would minimize the threat of loss of life and property to tenants from seismic hazards, resulting in beneficial impacts.

Under a demolition/new construction scenario, indirect impacts could occur from demolition of the existing CHFb and new construction on the 92-acre site to be disposed. Under this scenario for the Preferred Alternative, there could be moderate indirect impacts to geology, topography, and soils during construction. Impacts would likely be similar to as described for Alternative 1 Future Redevelopment (demolition/new construction scenario) but could be to a greater intensity as up to 92 acres of the site could be impacted. New construction would likely be conducted in accordance with current California Building Code and would minimize the threat of loss of life and property to tenants from seismic hazards, resulting in beneficial impacts.

Operations of a renovation/new construction scenario and a demolition/new construction would likely be similar to as described under Alternative 1 for the new USCIS building. There would likely be no direct impacts to geology or topography, but there could be long-term minor indirect impacts from the loss of soil structure from the increase in impervious surfaces at the site. New development may be required to comply with the terms of the City of Laguna Niguel new development stormwater requirements, similar to as described under Alternative 1, which would limit impacts from soil erosion over the long term (see Section 3.8, Water Resources).

Similar to Alternative 1, follow-on NEPA or CEQA analyses may further address excavation, soil erosion prevention, and stormwater management once development plans are finalized.

3.5.2.4 Impact Reduction Measures

Refer to Section 3.8.2.4 for a discussion of measures that would limit impacts from soil loss as a result of erosion during construction and operations.

Prior to issuance of a grading permit for any pavement in excess of 3,000 square feet, the future developer may be required to submit a site-specific geotechnical study to the City of Laguna Niguel for approval (City

of Laguna Niguel 2015). Per City requirements, all design, grading and construction is to be performed in accordance with requirements of the City of Laguna Niguel ordinances and the most recent California Building Code applicable at time of grading. Following approval, the future developer may be required to apply for a grading permit with the City of Laguna Niguel.

3.6 LAND USE

This section assesses the potential for existing land use patterns and development trends within the project area to affect, or be affected by, implementation of the project. Land use is described by land activities, ownership, and the governing entities' management plans. Local zoning defines land use types and regulates development patterns.

3.6.1 Affected Environment

The ROI for land use focuses on the 92-acre CHFB site and adjacent properties. The CHFB is located on a 92-acre site in Laguna Niguel, Orange County, California. The site is primarily used for federal office space and is located between Alicia Parkway and El Lazo at the Avila Road cross street. The CHFB site consists of the two parcels as shown on Figure 1-2. The main parcel is located at 24000 Avila Road, Laguna Niguel, California, and is bounded by Avila Road to the north, Alicia Parkway to the west, and El Lazo to the south and east. This parcel is 86.5 acres and includes the CHFB and surrounding parking lots, basketball courts, roads and driveways, landscaped areas, as well as other supporting facilities such as guard stations, a reservoir for fire suppression, a 500,000-gallon water tank that services the fire protection system, and a maintenance warehouse. The CHFB site also includes a large 3,840-cell photovoltaic system on the roof of the building that produces 914 kilowatts of electricity annually to support building operations (GSA 2019a). The second parcel includes the Central Utility Plant (CUP), which is located directly across the street on the north side of Avila Road at 23731 Avila Road, on the corner of Alicia Parkway and Avila Road. The CUP property is 5.5 acres and includes chillers, boilers, cooling tower, and other utility infrastructure (i.e., Southern California Edison's Niguel substation) (GSA 2017a).

The property is located in the northwestern corner of the City of Laguna Niguel, which is a high-value real estate suburban area comprised of retail and residential zones. The City of Laguna Niguel consists of 9,421 acres (14.72 square miles) and is located in the southwestern portion of Orange County. Laguna Niguel is predominantly a "bedroom" community to the job centers of central and northern Orange County (e.g., Irvine, Newport Beach), with most of the residential uses concentrated in well-defined areas linked together by parks, greenbelts, and curvilinear landscaped streets. The majority of residences are single-family units. One third of the City is devoted to open space, and a combination of regional parks, community parks, neighborhood parks, private recreation facilities, open space corridors, greenbelts, and landscaped slope banks are scattered throughout the City, which help establish its open space character (Laguna Niguel City Council 2011). There are several commercial areas located throughout the City, but there is not a primary downtown area. Regional shopping centers are located in nearby Laguna Hills and Aliso Viejo. Regional access is mainly provided by Interstate 5.

3.6.1.1 Land Use Planning and Zoning Municipal Zoning Designations

California law requires each city and county to adopt a comprehensive long-term general plan for its physical development. The City of Laguna Niguel's General Plan functions as a blueprint for the future through appropriate growth, policies, and programs, and it also serves as a decision-making tool to guide future growth and development. The Zoning Plan implements the City's General Plan. It classifies different land uses and regulates such uses in order to serve the greater needs of community.

Land use designations identified in the General Plan provide for a range of land uses. The designations are intended to be broadly defined to provide for future flexibility and options in site-specific land use planning. These designations are classified under general categories of residential, commercial, industrial, open space, and community facilities. Commercial centers are larger planned shopping complexes which provide for a range of goods and services and serve a larger area than neighborhood centers. Definitions applicable to the CHFB site, potential future use, and adjacent land uses include:

- Community Commercial: typical uses include retail businesses, restaurants, personnel services, home improvement, auto repair, major department stores, gas stations, appliance stores, food markets, auto repair.
- Business/Industrial Park: provides for a variety of compatible light manufacturing, wholesaling and office uses supportive of a variety of contemporary business center environments.
- Public/institutional: variety of government and social services to the community.

3.6.1.2 City and Community Plans

Laguna Niguel is comprised largely of several master planned communities and specific plan areas that were approved by Orange County over the last 20 years. Each of these planned communities prescribes specific land uses, site development standards, and plans for circulation and infrastructure systems. For comprehensive planning purposes, the City of Laguna Niguel has been separated into 14 Community Profile Areas that demonstrate common orientation or similar characteristics. These are all described in the City of Laguna Niguel's General Plan (Laguna Niguel City Council 2011). The Community Profile Area analysis provides the framework for the formulation of City goals, policies and implementation actions at a profile area level. The ROI for land use targets the existing GSA-owned, 92-acre CHF B site. The CHF B site is identified as being in Community Profile Area 1 in the General Plan.

Community Profile Area 1 includes a total of 320 acres and is bounded by Pacific Park Drive to the north, Laguna Niguel Regional Park to the south, Alicia Parkway to the west, and La Paz Road to the east. Community Profile Area 1 is one of the largest business districts in the City with respect to area (commercial square footage) and employment, and includes the CHF B.

The CHF B site is zoned as public/institutional and professional office. Zoning/land uses for areas immediately surrounding the site, as described in the General Plan, Chapter 2 (Laguna Niguel City Council 2011) include:

- Areas directly to the north of Avila Road (up to Pacific Park Drive) are zoned community commercial and professional office space (note the CHF B site lies close to the northern boundary of the City of Laguna Niguel and US 73).
- Areas directly to the east of El Lazo (to La Paz Road) are zoned community commercial, professional office and business/industrial park space. Across La Paz Road areas are zoned neighborhood commercial, open space (steep hill), residential (detached), and institutional (Laguna Niguel Elementary School, located approximately 0.25 mile to the southeast). An area zoned residential (attached) lies immediately to the northeast of the site.
- Areas directly to the south of El Lazo are zoned community commercial and open space (Laguna Niguel Regional Park, located across Aliso Creek Road, approximately 0.25 mile south), and additional residential (attached) further to the south.
- Areas to the west (directly across Alicia Parkway) are zoned parks and recreation and include the Aliso Creek/greenbelt (including a hiking and bike trail). The CHF B site is located next to City's western boundary with Aliso Viejo. Aliso Niguel High School lies immediately to the west of the CHF B in Aliso Viejo (less than 1,000 feet).

Figure 3.6-1 shows the general land uses of the areas immediately surrounding the site.

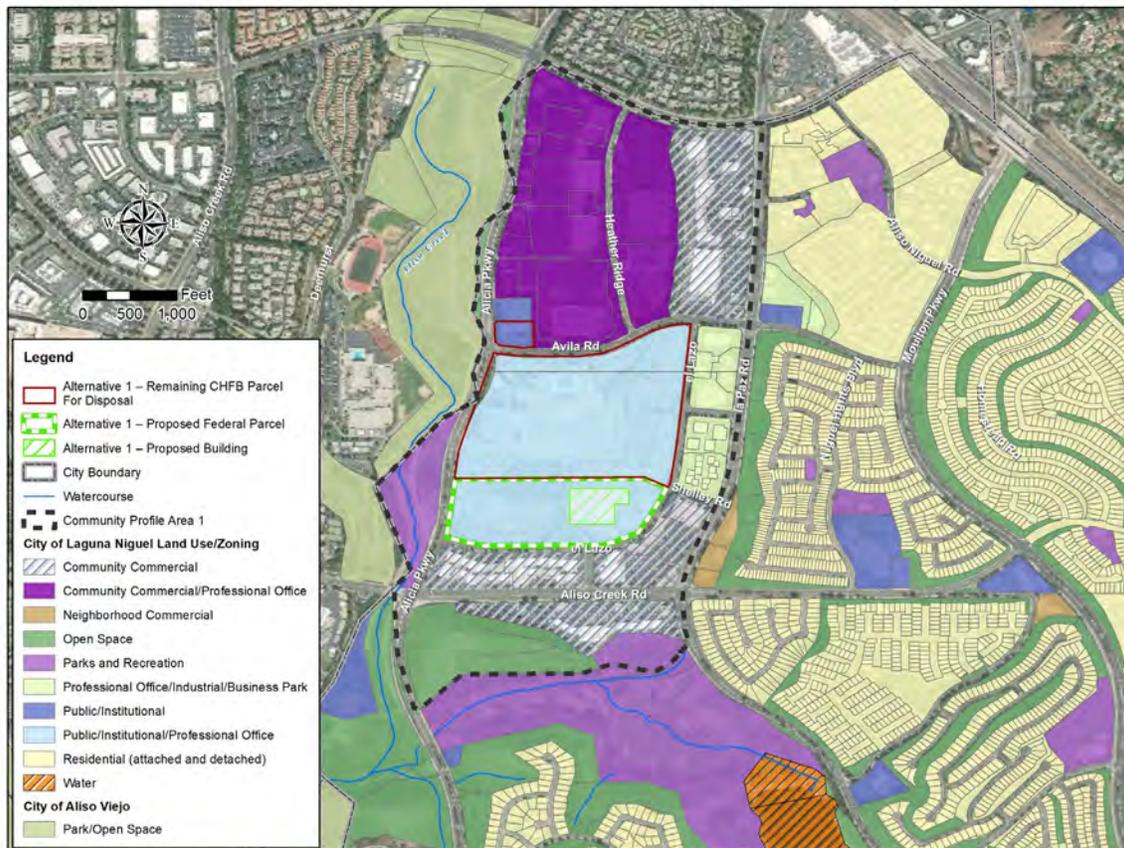


Figure 3.6-1. Land Uses in the Vicinity of the CHF B

Community Profile Area 1, also referred to as Country Village/Narland Business Center, was identified by the City (early in the General Plan’s development) as one of three opportunity areas offering special economic and community development opportunities. In selecting the preferred land use concept of each, the City analyzed market potentials for retail and service commercial; office; business park, industrial, and visitor serving uses in order to calibrate approximate acreage limits considered practicable in light of competing economic development in south Orange County. The original plan included goals that would allow for future expansion of Community Profile Area 1 within existing business centers, commercial and professional office space, and public/institutional uses (which includes the CHF B site). For example, the City’s 2011 General Plan projected an additional 300,000 square feet of professional office use on the CHF B site because it was underutilized (Laguna Niguel City Council 2011). An important land use objective in the City’s General Plan is the development of additional retail space on vacant commercial lands, and more efficient use of lands that have been developed. In particular, a high priority planning objective is to develop the remaining commercial areas with a mixed-use character having an emphasis on pedestrian circulation and amenities such as landscaped plazas and walkways (Laguna Niguel City Council 2011). This could be relevant to any future non-public use of the CHF B site. Any future development would also need to be consistent with the unique character of the community, which is shaped by three key land use elements: the land use patterns, the open space system (linked by walking/hiking and bicycle trails) and the circulation system (vehicular and non-vehicular modes).

3.6.2 Environmental Consequences

To evaluate the impacts to land use, alternatives were reviewed for their potential to cause the following:

- Changes in land use or zoning;

- Changes in land ownership; or
- Changes in or reduction of public use of recreational areas or special interest areas.

A significant adverse impact to land use would occur if is the action would result in:

- Inconsistent with current or planned future land uses and community plans or policies for land use;
- A major alteration of the character and use of the land in relation to surrounding uses; or
- Conflicting with zoning designations or ordinances.

Although local governments cannot regulate or permit activities of the federal government on federally owned land, federal agencies must consider local zoning laws for new building construction. The Public Buildings Amendments of 1988 direct that each building constructed or altered by GSA shall be constructed or altered only after consideration of all design requirements of state and local governments

3.6.2.1 No Action Alternative

Under the No Action Alternative, GSA would not construct a new USCIS building or relocate tenants to new offsite locations. These impacts are not anticipated to result in adverse effects on existing land use and zoning.

3.6.2.2 Alternative 1

Construction

Construction of the new USCIS building could cause temporary disturbances to adjacent land uses and users, such as from increased fugitive dust, traffic, or noise from construction activities (see Sections 3.3, Air Quality and Greenhouse Gases; 3.10, Transportation and Traffic; and 3.12, Noise). Construction for entrance road access and installing or upgrading utilities in roadways leading to the site could temporarily affect access to nearby retail and commercial businesses and residential areas. The intensity of any adverse impact would depend on the extent and duration of the access limitation or extent of detour but would be expected to be temporary and minor.

Operation

Under operations, the new USCIS building would operate as a federal facility, similar to the existing land use of the CHFb. GSA would consider all requirements of zoning laws, design guidelines, and other similar laws of the state and/or local government during the planning and development process (e.g., facility concept, design, site layout) to minimize impacts to adjacent land uses. This includes, but is not limited to, laws relating to landscaping, open space, building setbacks, maximum height of the building, historic preservation, and aesthetic qualities of the building. Since the property is already zoned public institutional, operation of the new facility would be consistent with existing land use and local zoning laws, and there would be no long-term adverse impact on existing land use.

The remaining 64.85 acres of land would be disposed and potentially subject to the City of Laguna Niguel rezoning process, depending on who acquires the site. If disposed out federal ownership, the site may need to be rezoned from its current public/institutional use. Impacts are further discussed below under Future Redevelopment.

Future Redevelopment

Under a renovation scenario, indirect impacts could occur from renovation of the existing CHFb on the remaining 64.85-acre parcel to be disposed. There could be negligible adverse impacts to off-site land use during construction activities, depending on the extent of exterior renovation activities, similar to as described for construction of the USCIS building.

Under a demolition/new construction scenario, indirect impacts could occur from demolition of the existing CHFEB and new construction on the remaining 64.85-acre parcel to be disposed. Impacts from demolition, waste removal, and construction of any future development would likely be similar to those described for construction of the new USCIS building (increased fugitive dust, traffic, or noise from construction activities) but could be to a greater intensity as development could occur over a larger area and to a greater extent. Such construction activities would be expected to result in short-term minor to moderate effects on surrounding land uses.

Future use of the portion of the site that is disposed (i.e., 64.85 acres) would be dictated by the new owner and the City of Laguna Niguel rezoning process (as applicable). Because a developer is not known at this time, no detailed plan exists for redevelopment of the property. This includes unknown density and composition of future commercial, residential, or mixed-use development that could occur. There could be a change in existing land use of the property, which is currently zoned public/institutional, and may require rezoning (unless, for example, future use is for another public/institutional use). Therefore, potential adverse indirect impact on land use could occur. However, the site is located in one of the City's business districts and currently surrounded by a variety of commercial, business, and professional office space, and the existing facility is already being used as professional office space. Therefore, any new zoning for a new commercial development would be expected to be consistent with existing zoning in the area and supported by the City of Laguna Niguel, and overall impacts on land use would likely be considered minor.

If included in future development, inclusion of any residential use in a mixed-use development could represent a greater change from existing land use. However, the CHFEB site is currently in close proximity to residential areas (e.g., approximately 0.2 mile to the east), and one of the City's goals in its General Plan (2011) is to promote mixed uses in any undeveloped commercial areas within this part of the City, as long as the future development is consistent with the unique character of the community (e.g., incorporates pedestrian circulation and amenities such as landscaped plazas and walkways). Any change in zoning to reflect future retail, office, or mixed use would presumably be consistent with the City's existing land use plan for this particular business area (Community Profile Area 1), and if the new development was in character with the surrounding community, the indirect impacts on land use would be minor.

Follow-on NEPA or CEQA analyses may be required (depending on who acquires the site) for any proposed redevelopment plans presented by a future developer, to include further consideration of potential impacts on land use.

3.6.2.3 Preferred Alternative (Alternative 2)

Under the Preferred Alternative, there would be no direct impacts on land use during construction or operations. All tenants would be removed from the CHFEB and no construction would occur at the site. Off-site leasing of new office space may require office buildouts; however, these buildouts would occur in existing commercial space and not result in any changes to current land use. There would be no change in, or adverse impact on, existing land use.

The 92-acre CHFEB site would be disposed and potentially subject to the City of Laguna Niguel rezoning process, depending on who acquires the site. If disposed out federal ownership, the site may need to be rezoned from its current public/institutional use. Impacts are further discussed below under Future Redevelopment.

Future Redevelopment

Under a renovation/new construction scenario, adverse indirect impacts could occur from renovation of the existing CHFEB, and from new construction on the south or west end of the 92-acre site to be disposed. Under this scenario for the Preferred Alternative, minor impacts to adjacent land uses from land disturbance (e.g., fugitive dust, noise, traffic) and site access could occur, similar to those described under Alternative 1 Future Redevelopment (renovation scenario) and construction of the new USCIS building. Under a demolition/new construction scenario, indirect impacts could occur from demolition of the existing CHFEB

and new construction on the 92-acre site to be disposed. Under this scenario for the Preferred Alternative, there could be short-term moderate indirect impacts to adjacent land uses during construction (increased fugitive dust, traffic, or noise from construction activities). Impacts would likely be similar to those described under Alternative 1 Future Redevelopment (demolition/new construction scenario) and construction of the new USCIS building, but could be to a greater intensity as up to 92 acres of the site could be developed.

Future development and operation of the existing CHFb site under a renovation/new construction scenario or a demolition/new construction scenario would likely be similar to that described under Alternative 1 Future Redevelopment in that both scenarios could represent a change in land use and require rezoning; however, the Preferred Alternative could require rezoning of the entire 92-acre site. Depending on the future use and how much of a change in land use it would represent from the current zoning (e.g., continued use as office space or mixed-use development), the potential impacts on land use could be slightly greater than under Alternative 1 given the larger area affected, and could be minor to moderate. Any new development plans for a new commercial development would likely be consistent with the overall land use goals for this area and thus supported by the City of Laguna Niguel, given the commercial nature of this part of the City and assuming the development incorporates elements that reflect the unique character of the community.

3.6.2.4 Impact Reduction Measures

Measures to reduce construction impacts on land use-related concerns such as fugitive dust, traffic, or noise from construction activities are discussed in Sections 3.3, Air Quality and Greenhouse Gases; 3.10, Transportation and Traffic; and 3.12, Noise, respectively.

Although local governments cannot regulate or permit activities of the federal government on federally owned land, GSA would consider local zoning laws for construction and operation of the new USCIS building and all design requirements of state and local governments to the extent practicable (GSA 2018a). This would include both the incorporation of exterior design elements to reflect the unique character of the area and the emphasis on pedestrian circulation and amenities such as landscaped plazas and walkways, to the extent practicable and consistent with GSA design standards.

3.7 VISUAL RESOURCES AND AESTHETICS

Visual resources consist of the natural and man-made landscape features that give a particular environment its visual characteristics. The CHFB site is an existing developed property owned by GSA and surrounded by developed residential and commercial areas. GSA does not have specific visual quality objectives in its real estate program; however, federal agencies, including GSA, consider local requirements for aesthetic qualities of new building construction. The Public Buildings Amendments of 1988, 40 U.S.C. 3312, direct that each building constructed or altered by GSA shall be constructed or altered only after consideration of all design requirements (except procedural requirements) of state or local governments (GSA 2018a).

GSA has a series of policy guides that address a variety of planning issues for federal facilities, including site security, site selection, project planning, and Facility Design standards. This includes GSA's mandatory facilities standard, Public Building Service P100 Facility Standards (P100 Standards), which applies to the design and construction of new federal facilities (as well as major repairs and alterations of existing buildings) (GSA 2018a); and the Whole Building Design Guide (GSA 2020c). In addition, GSA has programs in place related to community planning to help create federal facilities that are consistent with good neighbor principles and that support positive community development and neighborhood urban design goals. Key principles of GSA's Urban Development/Good Neighbor Program (GSA 2019b) include:

- Locate new owned and leased federal facilities in places that support public plans;
- Design new facilities to create outstanding federal workplaces and support neighborhood urban design goals;
- Renovate existing federal properties to improve their public spaces, create positive first impressions, and encourage stakeholders to improve neighborhood conditions;
- Manage federal properties to encourage public use and openness; and
- Participate in neighborhood physical and management improvement efforts around federal properties.

3.7.1 Affected Environment

The ROI for visual resources and aesthetics focuses on the 92-acre CHFB site and adjacent properties. The existing 92-acre CHFB site sits in the northwestern corner of Laguna Niguel, California between Alicia Parkway and El Lazo at the Avila Road cross street. The CHFB was originally constructed (1968-1971) for North American Aviation/Rockwell International, a company whose work included the manufacturing arena for defense and space industries. The building had 6,200 parking spaces radiating diagonally along the building axes to support the thousands of workers originally expected to work at the facility. The company never occupied the building because its requirements changed, and they exchanged the building with GSA in 1974.

The CHFB has a unique stepped pyramidal form that has a similar appearance to ancient ziggurats (i.e., ancient Mesopotamian temples). It is one of Laguna Niguel's earliest visual landmarks and one of Orange County's largest and most easily recognizable buildings. The building was designed by modern master architect William L. Pereira and includes seven tiers, with a large portion of the more than one million square foot building below-grade. The building is constructed of angled, painted pre-cast concrete panels with a textured finish that displays curvilinear forms. The top tier of the building has a large flat roof with attached protruding vertical elements that provide additional structure to the building. The east entrance is trapezoidal in form, which references the overall shape of the building. The building is surrounded by a "moat" of smooth rocks on three sides which helps to create the appearance of a modern-day fortress (GSA 2017a). GSA is currently in the process of nominating the building to be listed in the NRHP, the official list of the nation's historic places worthy of preservation (see Section 3.2, Cultural Resources). Refer to

Appendix C for photos that illustrate the extent to which the CHFEB is visible within the surrounding communities and general area.

Other structures at the site include a maintenance warehouse; a 500,000-gallon water tank that services the fire protection system; an energy plant; and security buildings. A heliport is located onsite and additional landscaped areas are located throughout the site. The remaining southern portion of the property includes large unused parking areas that have deteriorated due to age and wear and are in poor condition (see Chapter 2, Figure 2-2).

The surrounding area includes commercial shopping, retail centers, and office space; and the City of Aliso Viejo lies directly to the west. Figure 1-2 in Chapter 1 shows an aerial view of the CHFEB site and surrounding area. The closest residential areas extend up in the hills to the east and southeast of the site. Open spaces and recreational parks are located to the west and south; however, no designated scenic view corridors, vistas, viewing areas or other scenic resources have been identified within the vicinity of the CHFEB site (see also related discussion in Section 3.6, Land Use).

3.7.2 Environmental Consequences

To evaluate the impacts on visual resources, alternatives were reviewed for their potential to cause a change in the following:

- Existing scenic view;
- Existing character of the landscape;
- Amount of open space in an undeveloped area; or
- Visual and aesthetic experience and expectation of viewers in or near the CHFEB site.

A significant adverse impact to visual resources would occur if the action would result in:

- Alteration, obstruction or removal of what most observers would consider a scenic view;
- Detraction from a significant feature of the landscape;
- Elimination of a large area of undeveloped open space;
- Degradation of the visual appeal of an area; or
- Introduction of a visual element that is incompatible, out of scale or in great contrast with the surrounding area.

It should also be noted that the subjective importance or intensity of a visual impact would depend on the extent of obstruction and compatibility (or incompatibility) of introduced features and the attitudes, expectations, and perspectives of individual observers affected.

3.7.2.1 No Action Alternative

Under the No Action Alternative, GSA would not construct a new USCIS building or relocate tenants to new offsite locations. Therefore, no construction-related impacts to visual quality or the aesthetics of the area would occur. GSA would be responsible for continued stewardship of the building's exterior, including addressing current needs, such as masonry stabilization, concrete spalling, and other repairs, as described in the Historic Structures Report (Architectural Resources Group 2019); however, it would not affect any visual resources or aesthetics of the area.

3.7.2.2 **Alternative 1**

Construction

Short-term, minor adverse impacts would occur during construction under Alternative 1. Impacts would be localized and affect the CHFB site and immediate surroundings as a result of the unappealing aesthetic nature of construction activities. In the short term, the visual quality and character of the area near the CHFB site would be affected by the presence of construction materials, heavy equipment and construction vehicles, and unfinished stages of site preparation and building construction. Outdoor construction activities could extend to 8:00 p.m., consistent with the City of Laguna Niguel's Noise Ordinance (see Section 3.12, Noise). If construction activities occur during nighttime hours, there could be minor, short-term impacts from light pollution on neighboring properties. There are no residential areas immediately adjacent to the property but the use of outdoor lighting during nighttime construction activities could result in minor impacts to the closest residences within the viewshed of the parcel. The closest residences are located approximately 1,056 feet away. Lighting would be utilized to the extent practicable that would direct light downwards (e.g., down shielding) and minimize light pollution or nighttime glare to nearby residences. Impacts would decrease to negligible as construction progresses to later phases, particularly as landscaping is completed and work shifts to the interiors of completed structures.

Operations

Long-term, minor to moderate impacts would occur during operations under Alternative 1. The conversion of the 27.15-acre parcel to include a new four-story USCIS building would create a noticeable contrast to the existing parking area found on the property and alter the visual experience of those observing the site. However, the area to be disturbed is a previously developed site owned by GSA and the immediate area is heavily developed. In addition, there are no designated scenic view corridors, vistas, viewing areas or other scenic resources within the project vicinity. Within the existing parcel, an underutilized and deteriorated parking area would be renovated to provide new parking for the facility and would include professional landscaping to improve the parcel's overall appearance. The extent of the impact would depend on the dominance and noticeability of the building in the landscape and the observers' attitudes and perspectives regarding the presence and purpose of the new building. Visual impacts from the proposed new facility are expected to be minor with respect to the overall visual character, given the heavy development in the area and, in some cases, construction of the new facility could create greater cohesion or unity in the already developed landscape. See Figure 2-1 in Chapter 2 for a proposed rendering of the proposed new USCIS building.

The new USCIS building would be lower in height than the existing CHFB (i.e., four levels compared to seven tiers) and would not be as visible for as a great a distance as the existing CHFB. However, the new facility may obscure portions of the existing CHFB and affect its role in the overall landscape, which some observers could perceive as an adverse effect if they preferred the open, unobstructed view of the existing CHFB and its unique architecture (see also Section 3.2, Cultural Resources for additional discussion on the CHFB and its role in the surrounding landscape).

GSA would consider all requirements of zoning laws, design guidelines, and other similar laws of the state and/or local government during the planning and development process for the new building. This includes, but is not limited to: laws relating to landscaping, open space, building setbacks, maximum height of the building, historic preservation, and aesthetic qualities of the building. In addition, the new building would integrate GSA's programs of design/architecture and construction excellence in order to optimize building performance and aesthetics. Specifically, construction would follow GSA's P100 Standard which establishes design criteria and standards for new government buildings. GSA would seek LEED® Platinum certification, which has aesthetic components (specifically, "it must provide visual testimony to the dignity, enterprise, vigor and stability of the American Government" [GSA 2019c]).

Future Redevelopment

Under a renovation scenario, no indirect impacts are likely to occur from renovation of the existing CHFBI on the remaining 64.85-acre parcel to be disposed. There would likely be no adverse visual effects associated with construction activities since any building renovation activities would likely include mostly interior work, and any improvements made to the existing structure or existing landscaping would likely be considered a beneficial impact to the existing visual quality and character of the site.

There would likely be no change from existing conditions under operations of a renovation scenario. Minor improvements may be made to the building, but these would not likely affect any visual resources or aesthetics of the area.

Under a demolition/new construction scenario, minor to moderate indirect impacts could occur from demolition of the existing CHFBI and new construction on the remaining 64.85-acre parcel to be disposed. Demolition of the existing CHFBI and associated waste removal could represent a short-term adverse impact on existing aesthetics in the immediate vicinity of the CHFBI site. In the longer term, demolition of the CHFBI could represent a major change and a permanent alteration of the existing landscape of the project area; the change may be considered a potentially significant beneficial or adverse effect, depending on viewers' perceptions of the existing CHFBI. Some viewers may prefer the aesthetics, widespread visibility and constant presence of the CHFBI while others may prefer its demolition and replacement with the more limited visibility of new mixed-use space.

Short-term and long-term minor adverse indirect impacts associated with construction and operation of new development in a demolition/new construction scenario would likely be similar to as described for construction and operation of the new USCIS building, but to a larger extent depending on the size of development. In addition, federal building guidelines relating to design and construction would not necessarily apply if the new development is privately owned. The construction period of any new mixed-use space also may extend over a longer period of time and include some period of delay before construction were to begin, in order to accommodate site acquisition and the permitting and design process.

Follow-on NEPA or CEQA analyses may be required (depending on who acquires the site) for any proposed redevelopment plans presented by a future developer, to include further consideration of potential impacts on aesthetics and visual resources.

3.7.2.3 Preferred Alternative (Alternative 2)

Under the Preferred Alternative, no impacts to visual resources would occur during construction or operations. All tenants would be removed from the CHFBI and no construction would occur at the site. Off-site leasing of may require office buildouts; however, it is assumed any buildouts would occur in the building interior and would not result in any construction disturbances at the respective lease locations.

Future Redevelopment

Under a renovation/new construction scenario, minor to moderate indirect impacts could occur from renovation of the existing CHFBI, and from new construction on the south or west end of the 92-acre site to be disposed. Under this scenario for the Preferred Alternative, impacts from renovation may be minor and potentially beneficial to some observers, as described under Alternative 1 Future Redevelopment (renovation scenario). New construction could result in minor to moderate impacts during construction, similar to as described for Alternative 1 for construction of the USCIS building.

Operations of a renovation/new construction scenario would likely be similar to as described for Alternative 1 (renovation scenario). Renovation could have long-term beneficial impacts as work may be done to maintain and improve the existing structure. However, new construction could have minor to moderate long-term adverse effects due to the introduction of a new feature into the surrounding viewshed, similar to as described for construction of a new USCIS building.

Under a demolition/new construction scenario, minor to moderate indirect impacts could occur during the construction phase from demolition of the existing CHFEB and new construction on the 92-acre site to be disposed, similar as to described for the Alternative 1 Future Redevelopment (demolition/new construction scenario). Impacts could be to a greater intensity as construction could occur on a larger scale throughout the entire 92-acre site.

Operations of a demolition/new construction could be similar to as described for Alternative 1 Future Redevelopment (demolition/new construction scenario), but to a greater intensity. There could be long-term, significant beneficial or adverse impacts (subjective to the perspective of the observer) from removal of the CHFEB, which could result in a permanent alteration of the existing landscape. In addition, new structures may be built on the 92-acre site, which, depending on final design, could result in minor to significant impacts on the long-term viewshed, subjective to the perspective of the observer.

Similar to Alternative 1, follow-on NEPA or CEQA analyses may further address design considerations for any future redevelopment and associated potential impacts on aesthetics and visual resources.

3.7.2.4 Impact Reduction Measures

GSA would implement the following measures to minimize impacts to visual resources:

- Consult with local officials, consider local requirements for new building construction, and comply with state and local building codes to the maximum extent practicable.
- Integrate its programs of design/architecture and construction excellence into the new facility in order to optimize building performance and aesthetics, including adherence to P100 Standard which establishes design criteria and standards for new government buildings.
- Design exterior lighting to meet physical security requirements but controlled to minimize light trespass (e.g., direct light downward and minimize glare). Fixtures for the security fence would be a similar style. Exterior lighting would be consistent with the local ordinance code for outdoor lighting (Supplemental nonresidential regulations 9-1-45-14).
- Incorporate landscaping and screening (trees and vegetation) into the exterior design to provide aesthetic benefits to the surrounding community, consistent with GSA's Urban Development/Good Neighbor Program.

Similar measures regarding consulting with local officials, consideration of local requirements for new building construction, and compliance with state and local building codes may be required and implemented for any future development on the site as part of Alternatives 1 and 2, regardless of ownership.

3.8 WATER RESOURCES

Water resources may be grouped into five different areas in order to characterize the spectrum of potential impacts to the resource; these areas include water quality, groundwater, surface water, floodplains, and wetlands. In the following sections, the affected environment that is subject to potential impacts is described for these five different areas.

3.8.1 Affected Environment

3.8.1.1 Water Quality

The State Water Resources Control Board divides California into nine regions, each defining the jurisdiction for regional administration of the State's water quality control program. The CHFEB site is located within the San Juan Hydrologic Unit of the San Diego Region which drains south-southwest into the Pacific Ocean.

Water quality is regulated within the context of meeting standards established for compliance with the Clean Water Act (CWA). For instance, Sections 303(d) and 303(b) require states to identify water segments that fail to meet water quality standards. The Regional Water Quality Control Board (RWQCB) and the State Water Quality Control Board update that list of waterways every 2 years. CWA Section 402 establishes the National Pollutant Discharge Elimination System program. The California permit program, implemented by the State Water Resources Control Board, regulates discharges of pollutants into surface waters, including discharges during ground-disturbing activities that are transported by stormwater runoff. Under CWA Section 404, the U.S. Army Corps of Engineers regulates and permits the discharge of fill material into Waters of the United States.

3.8.1.2 Groundwater

Several federal statutes have been enacted that are protective of groundwater quality, including:

- Safe Drinking Water Act
- Federal Insecticide, Fungicide, and Rodenticide Act
- Toxic Substances Control Act
- Resource Conservation and Recovery Act
- Comprehensive Environmental Response, Compensation, and Liability Act "Superfund Act"

The state of California has identified groundwater basins in accordance with Bulletin 118, and regulates groundwater under the Sustainable Groundwater Management Act. No groundwater basins as identified by the State directly underlie the CHFEB site (DWR 2019). However, according to a Groundwater Sampling Results and Closure Request (TTMS, Inc. 1994), groundwater was encountered on the south end of the building during UST removal activities at the CHFEB site at depths ranging from approximately 11.9 to 16.1 feet below ground surface. No onsite information regarding groundwater flow direction was available for the subject property; however, according to a Report of Results for the Monitoring Well Installation, Sampling and Analysis (TPE Environmental 1990) at Laguna Niguel Regional Park Maintenance Yard (located directly south of the CHFEB), groundwater in the vicinity of the site flows in a southwest direction.

The December 2019 Phase I Environmental Site Assessment (ESA) for the project identified historical presence of leaking underground storage tanks (USTs) and potential unreported releases of perchloroethylene (PCE) from nearby dry-cleaning facilities as potential sources for groundwater contamination in the area (GSA 2019d).

Drinking water for the project area is imported from the Colorado River by the Metropolitan Water District of Southern California. Following treatment, the water is then supplied to the Moulton Niguel Water District

for distribution. The 2018 Consumer Confidence Report reports no violations; all drinking water provided by the Moulton Niguel Water District met or exceeded state and federal regulatory standards in 2018 (Moulton Niguel Water District 2019).

3.8.1.3 Surface Water

Neither natural nor artificial perennial surface water flow is present on the site. However, Aliso Creek, is located to the west of the CHF B site across Alicia Parkway as shown in Figure 3.8-1. Aliso Creek is a perennial waterway that receives substantial volumes of surface runoff, including from the CHF B site; approximately 75 percent of the watershed is urbanized. The route of this surface water was artificially realigned to accommodate construction of the CHF B in 1969 (USACE 2017).

Aliso Creek was listed as impaired, per section 303(d) of the Clean Water Act, in the 2014-2016 California Integrated Report. Pollutants identified in the integrated report for Aliso Creek include nutrients, metals, toxicity, pesticides, and miscellaneous (CRWQCB 2017).

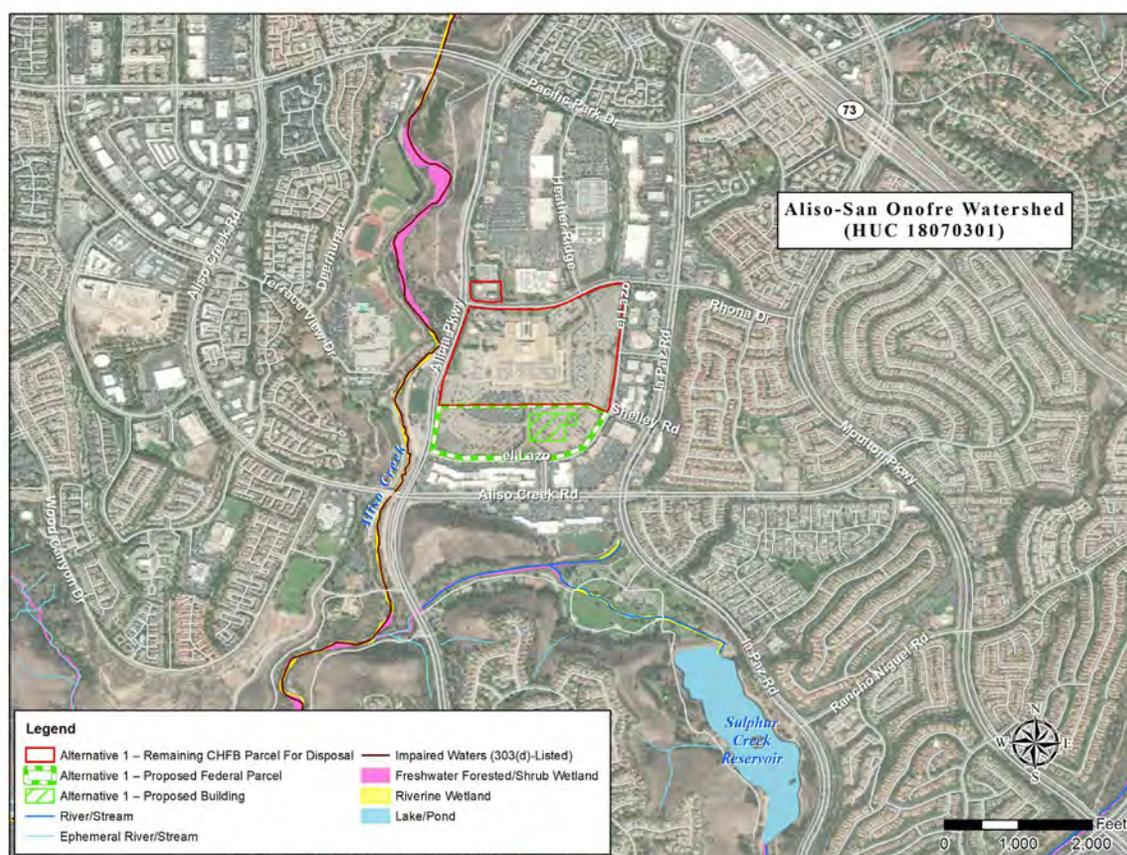


Figure 3.8-1. Water Resources in the Vicinity of the CHF B

3.8.1.4 Floodplains

Federal activities within floodplains must comply with the Executive Order (EO) 11988 *Floodplain Management*. Per EO 11988, federal agencies are required to avoid adverse effects associated with the occupancy and modification of floodplains to the extent possible, thereby minimizing flood risk and risks to human safety. An eight-step decision-making process for floodplain management has been outlined by 44 CFR 9.6 and is in GSA’s Floodplain Management Desk Guide.

According to the Federal Emergency Management Agency Flood Insurance Rate Maps depicting the CHFB site, much of the southern and eastern portions of the site are located within the 500-year flood zone (Zone X [shaded]) (FEMA 2009). Figure 3.8-2 depicts the location of the 500-year flood zone in relation to the existing CHFB site. Zone X (shaded) is defined as areas of 0.2 percent annual chance flood hazard or areas of 1 percent annual chance flood with average depth less than 1 foot or with drainage areas of less than 1 square mile. As no portions of the site are located within designated 100-year floodplains, the requirements of EO 11988 do not apply.



Figure 3.8-2. Floodplains in the Vicinity of the CHFB

3.8.1.5 Wetlands

EO 11990 requires that federal agencies take measures to not only minimize the destruction, loss, or degradation of wetlands, but also to enhance wetland habitats. The CHFB site is located on disturbed lands where no wetland areas are present onsite. However, the United States Fish and Wildlife Service (USFWS) Online Wetlands Mapper and National Wetlands Inventory identifies a riverine wetland and a palustrine freshwater forested/shrub wetland associated with Aliso Creek, located to the west of the CHFB site across Alicia Parkway (USFWS 2020).

3.8.2 Environmental Consequences

Impacts on water resources would be considered significant under the following conditions:

- Substantial alteration of stormwater discharges or infiltration rates, which could adversely affect drainage patterns, flooding, erosion and sedimentation
- Substantial alteration of groundwater recharge rates, which could adversely affect availability of groundwater

- Violation of any federal, state or regional water quality standards or discharge limitations
- Modification of surface waters such that water quality no longer meets water quality criteria or standards established in accordance with the Clean Water Act, state regulations or permits (including downgrades of surface water use classification or listing on the Nationwide Rivers Inventory)
- Changes to the availability of surface water or groundwater resources for current or future uses
- Change in stream channel morphology – slope and stability
- Loss of wetlands from the placement of dredge or fill material
- Alteration or conversion of wetland function caused by the removal of vegetation or contamination from a spill
- Increased flooding (flooding risk to nearby properties) through altered land uses (e.g., development in floodplain areas) that change current flooding levels or patterns

3.8.2.1 No Action Alternative

Under the No Action Alternative, GSA would not construct a new USCIS building or relocate tenants to new offsite locations. Ongoing maintenance to the CHFB would occur, which would generate negligible amounts of land disturbance and associated sedimentation to adjacent surface waters. No impacts to groundwater or floodplains would occur.

3.8.2.2 Alternative 1

Construction

During construction, there would be short-term impacts from increased potential for sedimentation and contamination of local waterways or wetlands from runoff from the construction site, as well as increased potential for spills of petroleum products or other hazardous materials stored onsite during construction. Sediments potentially contaminated by such spills and pesticides remaining in the soil from the historic use of the property for agriculture could travel offsite and adversely affect water quality in offsite surface waters or wetlands. Because the project would disturb more than 1 acre of soil, selection of Alternative 1 would include adhering to the terms of California's Stormwater Construction General Permit and would consider measures contained within the Orange County Construction Runoff Guidance Manual (Orange County 2012). Conditions of the permit require development of appropriate documentation (i.e., Notice of Intent, Risk Assessment, site map, Stormwater Pollution Prevention Plan [SWPPP], signed certification statement, post-construction documentation, and payment of fees). The findings of the Risk Assessment would determine the hazards associated with the site conditions and establish specific compliance conditions of the permit. A SWPPP is required to be developed prior to construction to address control of pollutant discharges using best management practices (BMPs) selected for the specific project and to address stormwater monitoring. These BMPs include, but are not limited to, the measures summarized in Section 3.8.2.4.

New development would also be required to comply with the terms of the City of Laguna Niguel new development stormwater requirements which requires all development/redevelopment projects, where applicable and feasible, to maximize infiltration, provide retention, slow runoff, and reduce pollutants at the sources. The City requires all priority projects (new development that create 10,000 square feet or more of impervious surface or redevelopment projects that add or replace at least 5,000 square feet or more of impervious surface on an already developed site) develop a Water Quality Management Plan (WQMP) and Hydromodification Management Plan (HMP). The project's WQMP is a plan for minimizing the adverse effects of urbanization on site hydrology, runoff flow rates, and pollutant loads. The HMP provides measures that address the changes in the magnitude and frequency of stream flows and associated sediment

load due to urbanization or other changes in the watershed land use and hydrology. Both these plans serve to reduce the resulting impacts on receiving channels, such as erosion, sedimentation and potential degradation of in-stream habitat (City of Laguna Niguel 2020a). General requirements for water quality management for construction projects are summarized in Section 3.8.2.4.

Following construction, the site must meet the conditions for Notice of Termination by certifying the site has been stabilized and there is no potential for construction-related stormwater discharges. Post-construction BMPs and long-term maintenance plans must also be in place in order to apply for Notice of Termination. With adherence to these conditions, overall impacts to surface waters and wetlands from potential spills, erosion, and sedimentation during construction would remain minor.

Minor adverse impacts could also arise due to construction within a designated 500-year floodplain. The short- and long-term additions of new structures or impervious surfaces in such areas could reduce the floodplain's capacity to store water, thus increasing the spread or intensity of a flood event. Flooding events, however, in the 500-year floodplain are low probability; 0.2 percent annual chance flood hazard or areas of 1 percent annual chance flood with average depth less than 1 foot or with drainage areas of less than 1 square mile.

Excavation and construction activities could result in minor adverse effects to groundwater. While no known groundwater basins underlie the CHFb site, water has been found during previous excavation activities, and future construction could affect groundwater flow or degrade existing groundwater quality. GSA would implement appropriate measures to prevent any groundwater contamination, such as that arising from hazardous materials used during construction or accidental releases of petroleum from construction equipment (see Section 3.11, Hazardous Waste and Materials). Groundwater is not used as a source of potable water in the region nor is it anticipated to support construction. Should dewatering be required during construction, GSA would obtain appropriate permits as needed for groundwater dewatering discharge (i.e., Order Number R9-2008-0002 / CAG919002).

Operations

Implementation of Alternative 1 would result in minor adverse impacts due to long-term increases in stormwater runoff and long-term decreases in groundwater recharge. Under Alternative 1, there would be an overall increase in impervious surfaces across the existing CHFb site, as gravel areas are paved to accommodate new construction. This could increase the volume of stormwater runoff from the site entering Aliso Creek. Stormwater management measures are subject to final design but may include use of bioswales and permeable pavement to reduce stormwater runoff. Water capture technologies and green roofs may also be considered. See Section 3.8.2.4 for a discussion of measures that could further reduce or avoid potential impacts.

No direct impacts to floodplains would be anticipated during operations of Alternative 1, including both operations of the new USCIS building as well as off-site leasing of new office space in locations throughout the region.

There would be no impacts to water resources from disposal of the remaining 64.85 acres of the CHFb site.

Future Redevelopment

Under a renovation scenario, adverse indirect impacts could occur from renovation of the existing CHFb on the remaining 64.85-acre parcel to be disposed. No indirect impacts to groundwater or floodplains are expected under construction or operations, but there could be minor indirect impacts to offsite surface waters and wetlands during construction. Under this scenario for Alternative 1, there could be minor amounts of land disturbance near the CHFb while improvements are made to the structure. Such improvements could require soil disturbance and erosion, leading to increased sedimentation and associated minor adverse effects to offsite surface waters and wetlands. However, potential impacts may be mitigated

through adherence to the terms outlined in the Construction General Permit and contained within the Orange County Construction Runoff Guidance Manual.

No indirect impacts to water resources would be expected during operations of a renovation scenario. Stormwater discharge from the site would likely be comparable to existing conditions, and may be further avoided through WQMP and HMP stormwater requirements by the City of Laguna Niguel if renovations were to include 5,000 square feet or more of impervious surface; these plans could serve to reduce the resulting impacts on receiving channels, such as erosion, sedimentation and potential degradation of in-stream habitat during operations.

Under a demolition/new construction scenario, adverse indirect impacts could occur from demolition of the existing CHFB and new construction on the remaining 64.85-acre parcel to be disposed. Under this scenario, there could be minor indirect impacts to surface water, groundwater, floodplains, and wetlands. Impacts would likely be similar to those described for construction of the new USCIS building, but could be to a greater intensity as development could occur over a larger area and to a greater extent. Excavation could be required, which could affect groundwater quality and flow, depending on overall excavation depth. Impacts could also include additional ground disturbance and an increase in impervious surface, leading to increased sedimentation and stormwater runoff from the site. New construction may be subject to the terms of the California Stormwater Construction General Permit and the City of Laguna Niguel construction site stormwater requirements, which would limit impacts during construction. Depending on placement of the building, there could be minor adverse impacts due to construction within a designated 500-year floodplain, similar to as described for the USCIS building.

Long-term, minor, adverse indirect impacts could be associated with new development, similar to those described for operations of the new USCIS building, but to a larger extent depending on the size of development. New development may also be required to comply with the terms of the WQMP and HMP, which would limit impacts over the long term.

Follow-on NEPA or CEQA analyses may be required (depending on who acquires the site) for any proposed redevelopment plans presented by a future developer, to include further consideration of excavation, soil erosion prevention, and stormwater management once final development plans are completed.

3.8.2.3 Preferred Alternative (Alternative 2)

Under the Preferred Alternative, there would be no direct impacts to water resources during construction or operations. All tenants would be removed from the CHFB, and no construction would occur at the site. Off-site leasing of new office space may require office buildouts; however, these buildouts would not require ground disturbance, and no impacts to water resources would occur. There would be no impacts to water resources from disposal of the CHFB site.

Future Redevelopment

Under a renovation/new construction scenario, indirect impacts could occur from renovation of the existing CHFB and new construction on the south or west end of the 92-acre site to be disposed. Under this scenario for the Preferred Alternative, there could be minor indirect impacts to surface water and wetlands during construction. Minor impacts from land disturbance in the area around the CHFB could occur as the building is renovated, similar to those described under Alternative 1 Future Redevelopment (renovation scenario). In addition, there could be some new construction on the south or west end of the site, resulting in minor impacts, similar to those described for construction of the new USCIS building under Alternative 1.

Under a demolition/new construction scenario, indirect impacts could occur from demolition of the existing CHFB and new construction on the 92-acre site to be disposed. Under this scenario for the Preferred Alternative, there could be a minor indirect impact to floodplains and minor to moderate indirect impacts to surface water and wetlands during construction. Impacts would likely be similar to those described under Alternative 1 Future Redevelopment (demolition/new construction scenario) but could be to a greater

intensity as up to 92 acres of the site could be affected. Similar to other scenarios, new construction may be subject to the terms of the California Stormwater Construction General Permit and the City of Laguna Niguel construction site stormwater requirements, which could limit the extent of indirect effects during construction.

Operations of a renovation/new construction scenario and a demolition/new construction scenario could result in impacts similar to those described under Alternative 1 for construction of a USCIS building, but to a greater intensity due to larger extent of development. There would likely be no direct impacts to groundwater and floodplains, but there could be long-term, minor, indirect impacts on surface water and wetlands from the increase in impervious surfaces onsite. New development may be required to comply with WQMP and HMP stormwater requirements imposed by the City of Laguna Niguel which could serve to reduce the resulting impacts on receiving channels, such as erosion, sedimentation and potential degradation of in-stream habitat.

Similar to Alternative 1, follow-on NEPA or CEQA analyses may further address soil erosion prevention and stormwater management once final development plans are completed.

3.8.2.4 Impact Reduction Measures

Orange County requires construction to comply with two interrelated sets of municipal directives with respect to water quality management: (1) compliance with applicable discharge prohibition requirements set forth in the Water Quality Ordinance to prevent unauthorized non-stormwater discharges, and (2) implementation of BMPs to the maximum extent practicable, in accordance with the County Drainage Area Management Plan and local agency requirements, to reduce contaminants in stormwater discharges. The County requires all construction projects regardless of size, at a minimum, to implement an effective combination of erosion and sediment controls and waste and materials management BMPs. This would apply to any ground-disturbing construction project at the site and includes (City of Laguna Niguel 2020b):

- 1) Sediments from areas disturbed by construction shall be retained on site using an effective combination of erosion and sediment controls to the maximum extent practicable and stockpiles of soil shall be properly contained to minimize sediment transport from the site to streets, drainage facilities or adjacent properties via runoff, vehicle tracking, or wind.
- 2) Construction-related materials, wastes, spills or residues shall be retained on site to minimize transport from the site to streets, drainage facilities, or adjoining property by wind or runoff.

Construction projects involving 1 acre or greater of soil disturbance must comply with the State's Construction General Permit (City of Laguna Niguel 2020b). This includes:

- 1) Applying for and complying with a local grading or building permit and complying with local ordinances
- 2) Submission of a Notice of Intent for Construction General Permit Coverage to the State Water Resources Control Board
- 3) Preparation and implementation of a SWPPP
- 4) Implementation of BMPs as required by the City and the Construction General Permit and preparation and submission of an Erosion and Sediment Control Plan for approval
- 5) Following construction completion, submit a Construction General Permit Notice of Termination

The City of Laguna Niguel also requires Erosion and Sediment Control Plans showing all BMPs for construction, even when a project disturbs less than 1 acre of soil and is not covered by the Construction General Permit (City of Laguna Niguel 2020b).

The Orange County Stormwater Program's Construction Runoff Guidance Manual summarizes BMPs pertaining to erosion control, sediment control, wind erosion control, tracking control, non-stormwater

management, waste management and materials pollution control, and inspection and maintenance. Typical BMPs include:

- 1) Development and implementation of a site-specific run-off management plan.
- 2) Minimization of areas that are cleared and graded to only the portion of the site that is necessary for construction.
- 3) Minimization of exposure time of disturbed soil areas.
- 4) Minimization of grading during the wet season and correlation of grading with seasonal dry weather periods to the extent feasible.
- 5) Limitation of grading to a maximum disturbed area as determined by the County/City before either temporary or permanent erosion controls are implemented to prevent stormwater pollution. The county/city has the option of temporarily increasing the size of disturbed soil areas by a set amount beyond the maximum, if the individual site is in compliance with applicable stormwater regulations and the site has adequate control practices implemented to prevent stormwater pollution.
- 6) Temporary stabilization and reseeded of disturbed soil areas as rapidly as feasible.
- 7) Non-stormwater management measures to prevent illicit discharges and control stormwater pollution sources.
- 8) Erosion control BMPs such as physical/vegetative stabilization and concentrated flow erosion control – reducing concentrated flow velocity or protecting concentrated flow paths to prevent erosion.
- 9) Wind erosion control BMPs for dust control and prevention of erosion by wind.
- 10) Sediment control BMPs at all operational storm drain inlets, and at all non-active slopes.
- 11) Waste management and materials pollution control BMPs to prevent the contamination of stormwater by construction wastes and materials.
- 12) Evaluation and maintenance of all BMPs, until removed.
- 13) Retention, reduction, and proper management of all stormwater pollution discharges on site to the Maximum Extent Practicable standard.

Regarding an operational footprint increase in impervious surface, the City of Laguna Niguel requires preparation of a WQMP and a HMP for “priority development projects”, defined as new development that creates 10,000 square feet or more of impervious surface or redevelopment projects that add or replaces at least 5,000 square feet or more of impervious surface on an already developed site. The WQMP is a site-specific and project-specific plan that identifies measures to minimize the adverse effects of urbanization on site hydrology, runoff flow rates and pollutant loads. The hydromodification management plan is also a site-specific and project-specific plan which serves to reduce adverse changes to the magnitude and frequency of stream flows and associated sediment load due to urbanization or other changes in the watershed land use and hydrology (City of Laguna Niguel 2020a).

Similar measures may be required and implemented for any future development on the site as part of Alternatives 1 and 2, regardless of ownership.

3.9 BIOLOGICAL RESOURCES

The biological resources that have been identified for consideration in this EIS are vegetation, wildlife, migratory birds, special status species (including federally listed endangered, threatened and candidate species and State of California protected species) and designated or proposed critical habitat. This section describes the biological resources occurring at the CHFB site and more general project area, and the potential environmental effects of the alternatives on these resources.

3.9.1 Affected Environment

The ROI for biological resources focuses on the 92-acre CHFB site and adjacent properties. The CHFB site has been previously disturbed and developed and contains mostly paved surfaces and landscaped areas. Undeveloped lots comprised primarily of gravel are located on the southern end of the site, and maintained landscaped areas comprised of native and non-native vegetation surround the building. In addition, indirect impacts could affect biological resources found within properties located adjacent to the CHFB.

No direct impacts to biological resources would occur from this action outside of the 92-acre CHFB site. It is assumed that off-site leased office space would be located in previously developed areas and any necessary build-out would not require new ground disturbance.

3.9.1.1 Vegetation

The CHFB site is fully developed and located in a mixed-use landscape. Surrounding properties include a mix of developed, undeveloped but disturbed, and landscaped lots. Little to no natural habitat remains within adjacent parcels (City of Laguna Niguel 1992a). As shown in Figure 3.9-1, the only adjacent vegetation communities are located to the west of the site and primarily consist of annual grasses and forbs, riparian mixed shrub, and coast live oak woodlands.

As characterized by the CHFB site and surrounding landscape, natural habitat areas in Orange County are highly fragmented by development. Aliso Creek, located directly west of Alicia Parkway which borders the CHFB site, provides an important wildlife corridor containing a mix of riparian mixed scrub and grassland (see Figure 3.9-1). The riparian corridor provided by Aliso Creek connects larger areas of protected wildlife habitat in Orange County; between the Cleveland National Forest located to the north and west of the CHFB site and the Aliso Woods Canyon Wilderness Park located to the south and east of the CHFB site.



Figure 3.9-1. Vegetation Found in Vicinity of CHFB Site

3.9.1.2 *Wildlife*

Terrestrial wildlife includes native and non-native or naturalized terrestrial animals and the habitats in which they exist. Species addressed in this section include those not listed as threatened or endangered by the USFWS or protected by the state of California. The CHFB site is completely developed or disturbed, and no natural faunal assemblages are present. Examples of urban wildlife typically found in Orange County, which may also inhabit the disturbed area around the CHFB site, includes bats, opossums, raccoons, skunks, snakes, and ducks (Orange County 2020).

3.9.1.3 *Migratory Birds*

The Migratory Bird Treaty Act (MBTA) makes it unlawful to pursue, hunt, take, capture, kill, or sell birds (including any parts, dead or alive, feathers, eggs and nests) that are listed in the statute. Currently there are over 800 species on the list nationally. Several migratory bird species protected by the MBTA could occur within the CHFB site at various times of the year; they are listed in Table 3.9-1 (USFWS 2019). The site is predominately urban/disturbed with some landscaping and trees throughout the site.

Table 3.9-1. Migratory Bird Species Potentially Occurring in the Project Area			
Species	Habitat	Probability of Presence	Breeding Season
Allen's Hummingbird (<i>Selasphorus sasin</i>)	Coastal forest, scrub, and chaparral habitats at elevations of up to 1,000 feet.	Year-round	February 1 – July 15
Bald Eagle (<i>Haliaeetus leucocephalus</i>)	Areas with tall trees or perches around open water.	September	January 1 – August 31
Black Skimmer (<i>Rynchops niger</i>)	Coastal areas around sandy beaches and islands or inland near very large lakes.	August	May 20 – September 15
Clark's Grebe (<i>Aechmophorus clarkia</i>)	Nesting areas include large lakes and marshes with emergent vegetation. When not nesting, may be found in saltwater or brackish habitats.	January, February, April, August, October-December	Year-round
Common Yellowthroat (<i>Geothlypis trichas sinuosa</i>)	May be found in a wide range of habitats with thick vegetation, but are most common in wet areas.	Year-round	May 20 – July 31
Costa's Hummingbird (<i>Calypte costae</i>)	Sage scrub and chaparral habitats.	January, March, April, August-October, December	January 15 – June 10
Golden Eagle (<i>Aquila chrysaetos</i>)	Open and semi-open areas with native vegetation, primarily in areas of steep terrain at elevations of up to 12,000 feet.	June, September	January 1 – August 31
Lawrence's Goldfinch (<i>Carduelis lawrencei</i>)	Primary nesting areas include dry, open, oak woodlands with chaparral, weedy fields, and a source of freshwater.	January-March	March 20 – September 20
Long-billed Curlew (<i>Numenius americanus</i>)	Shortgrass prairies, alkali lakes, wet pastures, tidal mudflats, and agricultural fields are used during migrations along the coastline.	March	Breeds elsewhere
Marbled Godwit (<i>Limosa fedoa</i>)	Coastal mudflats, estuaries, and sandy beaches.	January, April	Breeds elsewhere
Nuttall's Woodpecker (<i>Picooides nuttallii</i>)	Oak woodlands at elevations between 900 and 5,500 feet above sea level.	Year-round	April 1 – July 20
Oak Titmouse (<i>Baeolophus inornatus</i>)	Primarily found in warm, open, dry oak or oak-pine woodlands or in scrub oaks or other brush with nearby woodlands.	January-April, July, October, November	March 15 – July 15
Rufous Hummingbird (<i>Selasphorus rufus</i>)	Winter in shrubby areas, thorn forests, and oak, pine, and juniper woodlands at elevations between 7,500 and 10,000 feet.	February-May, July-September	Breeds elsewhere
Song Sparrow (<i>Melospiza melodia</i>)	Inhabit a wide range of habitats, including tidal marshes, desert scrub, pinyon pine forests, deciduous forests, aspen parklands, prairie, Pacific rain forest, chaparral, agricultural lands, freshwater marsh, and suburbs.	Year-round	February 20 – September 5

Species	Habitat	Probability of Presence	Breeding Season
Spotted Towhee (<i>Pipilo maculatus clementae</i>)	Inhabit areas of dense shrub cover and plenty of leaf litter, including dry thickets, forest edges, old fields, chaparral, and canyon bottoms.	Year-round	April 15 – July 20
Tricolored Blackbird (<i>Agelaius tricolor</i>)	Historically found in wetlands, but now also utilize agricultural fields.	February, April, September	March 15 – August 10
Willet (<i>Tringa semipalmata</i>)	During the wintering period, found along open beaches, bay shorelines, marshes, mudflats, and rocky coasts.	November	Breeds elsewhere
Wrentit (<i>Chamaea fasciata</i>)	Coastal scrub and chaparral along the coast.	Year-round	March 15 – August 10

Source: NatureServe 2019; The Cornell Lab 2019; USFWS 2019

Based on a review of the habitat requirements of the special status species listed in Table 3.9-1, the potential for these species to be present at the CHFB site are low given the existing development and disturbed conditions at the site.

3.9.1.4 Threatened and Endangered Species

This section discusses federally listed species and state of California special status species that have the potential to occur within the ROI.

Federally Listed Species

Under the Endangered Species Act, an endangered species is defined as any species in danger of extinction throughout all or a significant portion of its range. A threatened species is defined as any species likely to become an endangered species in the foreseeable future. Species that are federally listed as threatened or endangered and that have the potential to occur in the ROI are discussed in this section.

The *Information, Planning, and Consultation System (IPaC)*, maintained by the USFWS, was queried for federally listed threatened and endangered species and designated critical habitats potentially occurring within or near the CHFB site. The species list generated by the database search includes a total of 12 federally threatened or endangered species (as shown in Table 3.9-2): one mammal, four birds, one amphibian, one fish, two crustaceans, and three plants (USFWS 2019). NatureServe elemental occurrence data were also used to determine the presence of species within the ROI (NatureServe 2019). An elemental occurrence is defined by NatureServe as an area of land or water where a species or natural community is or was present and has conservation value. These occurrence data require that a species is in appropriate habitat, at the appropriate time of the year, and is naturally occurring (NatureServe 2019). Table 3.9-2 also includes a brief assessment of each species’ likelihood of occurrence in the project area based on the species’ range/distribution and habitat requirements.

Table 3.9-2. Federally Threatened and Endangered Species Potentially Occurring in the Project Area

Species	Status	Habitat	Possibility of Occurrence in the Project Area
Pacific Pocket Mouse (<i>Perognathus longimembris pacificus</i>)	Endangered	Inhabit shrublands with sandy soil near the ocean, coastal dunes, river alluvium, and coastal sage scrub.	None. No suitable habitat. No Critical Habitat in the project area.
California Least Tern (<i>Sterna antillarum browni</i>)	Endangered	Breeds on sandy or gravelly beaches and banks of rivers or lakes. Also found along seacoasts, beaches, bays estuaries, lagoons, lakes, and rivers.	None. No suitable habitat. No Critical Habitat in the project area.
Coastal California Gnatcatcher (<i>Polioptila californica californica</i>)	Threatened	Coastal areas dominated by California sagebrush, usually at elevations of less than 1,600 feet. May forage in chaparral areas bordered by sage scrub.	None. No suitable habitat. No Critical Habitat in the project area.
Least Bell's Vireo (<i>Vireo bellii pusillus</i>)	Endangered	Inhabit areas of dense shrub or scrub. In arid regions, this species may be found along streams or in dry arroyos and gulches.	None. No suitable habitat. No Critical Habitat in the project area.
Southwestern Willow Flycatcher (<i>Empidonax traillii extimus</i>)	Endangered	Areas with willows or other shrubs near standing or running water.	None. No suitable habitat. No Critical Habitat in the project area.
Arroyo Toad (<i>Anaxyrus californicus</i>)	Endangered	In California, found on sandy banks in riparian woodlands.	Potential for suitable habitat to be present; however, potential is low due to existing development and maintained landscaping in the project area. No Critical Habitat in the project area.
Tidewater Goby (<i>Eucyclogobius newberryi</i>)	Endangered	Most abundant in the upper ends of lagoons created by small coastal streams. May also be found in brackish water of the lower sections of such streams, or in vegetated pools of slow moving streams.	None. No suitable habitat. No Critical Habitat in the project area.
Riverside Fairy Shrimp (<i>Streptocephalus wootoni</i>)	Endangered	Vernal pools that dry up and refill during the year.	None. No suitable habitat. No Critical Habitat in the project area.
San Diego Fairy Shrimp (<i>Branchinecta sandiegonensis</i>)	Endangered	Vernal pools and ephemeral wetlands.	None. No suitable habitat. No Critical Habitat in the project area.
Big-leaved Crownbeard (<i>Verbesina dissita</i>)	Threatened	Rugged coastal hillsides and canyons in dense maritime chaparral communities. May also occur in coast sage scrub and mixed chaparral communities.	None. No suitable habitat. No Critical Habitat in the project area.
Laguna Beach Liveforever (<i>Dudleya stolonifera</i>)	Threatened	Weathered sandstone rock outcrops within coastal sage scrub or chaparral communities.	None. No suitable habitat. No Critical Habitat in the project area.
Thread-leaved Brodiaea (<i>Brodiaea filifolia</i>)	Threatened	Grasslands, typically in association with vernal pools and floodplains.	Potential for suitable habitat to be present; however, potential is low due to existing development and maintained landscaping in the project area. No Critical Habitat in the project area.

Source: NatureServe 2019; the Cornell Lab 2019; USFWS 2019

Based on a review of the habitat requirements of the special status plant and animal species listed in Table 3.9-2, the potential for these plants or animals to be present at the CHFB site are low given the existing development and disturbed conditions at the site.

Critical habitat, as defined and designated by the USFWS, is the habitat necessary to support the special needs of federally threatened or endangered species. There are no critical habitat designations for protected species at the CHFB site (USFWS 2019), thus critical habitat is not discussed in the analysis of impacts.

State of California Special Status Species

Special status species are identified by state agencies to conserve rare species, avoid future federal threatened or endangered status, and avoid impacts during construction activities. These species are not listed as federally threatened, endangered, proposed, or candidate species. Special status species are considered:

- Species protected by the MBTA (discussed above in Section 3.9.1.3 Migratory Birds);
- Rare, endangered, or threatened species designated by the State of California and/or listed in the California Natural Diversity Database;
- Endangered or rare species designated under Section 15380(d) of CEQA guidelines;
- Species with a California Native Plant Society Rare Plant Ranking of 1 or 2 in the Inventory of Rare and Endangered Vascular Plants of California; and
- Fully protected animals by the California Department of Fish and Wildlife.

The special status species listed in Table 3.9-3 were identified as potentially occurring in the vicinity of the CHFB site (California Department of Fish and Wildlife 2019).

Table 3.9-3. State of California Special Status Species Potentially Occurring in the Project Area

Species	Habitat	Possibility of Occurrence in Project Area
Western Spadefoot (<i>Spea hammondi</i>)	Found in a variety of habitats, but prefers shortgrass plains and sandy or gravelly soil. Breeding occurs in temporary rain pools and slow-moving streams.	Potential for suitable habitat to be present; however, potential is low due to existing development and maintained landscaping in the project area. No Critical Habitat in the project area.
Northern Harrier (<i>Circus hudsonius</i>)	Most commonly found in large tracts of wetlands and grasslands with low, thick vegetation. Western populations breed in dry upland habitats, including meadows, fields, prairies, high desert shrubsteppe.	None. No suitable habitat. No Critical Habitat in the project area.
White-tailed Kite (<i>Elanus leucurus</i>)	Savannas, open woodlands, marshes, desert grasslands, partially cleared lands, and cultivated fields.	None. No suitable habitat. No Critical Habitat in the project area.
Black Swift (<i>Cypseloides niger</i>)	Nesting occurs in sea caves and on cliff ledges near waterfalls, and foraging habitat includes forests and open areas. In California, they are found at elevations between sea level and 7,500 feet.	None. No suitable habitat. No Critical Habitat in the project area.

Table 3.9-3. State of California Special Status Species Potentially Occurring in the Project Area

Species	Habitat	Possibility of Occurrence in Project Area
Mountain Plover (<i>Charadrius montanus</i>)	Breeding occurs in open plains at moderate elevations. Wintering habitat includes short-grass plains, fields, and sandy deserts.	None. No suitable habitat. No Critical Habitat in the project area.
American Peregrine Falcon (<i>Falco peregrinus anatus</i>)	Breeding occurs in open landscapes with cliffs, and nests have been found at elevations of up to 12,000 feet. Nest sites may also be located along rivers and coastlines or in cities. During migrations and the wintering season, these birds may be found in almost any open habitat, but especially along barrier islands, mudflats, coastlines, lake edges, and mountain chains.	None. No suitable habitat. No Critical Habitat in the project area.
Purple Martin (<i>Progne subis</i>)	In the western U.S., primarily utilize woodpecker holes in mountain forests or Pacific lowlands. Foraging occurs over towns, cities, parks, open fields, dunes, stream, wet meadows, and other open areas.	Potential for suitable habitat to be present; however, potential is low due to existing development and maintained landscaping in the project area. No Critical Habitat in the project area.
Yellow-breasted Chat (<i>Icteria virens</i>)	Breeding occurs in areas of dense shrubbery, and habitat often includes blackberry. In arid regions of the western U.S., typically found along rivers.	None. No suitable habitat. No Critical Habitat in the project area.
Loggerhead Shrike (<i>Lanius ludovicianus</i>)	Open country with short vegetation and shrubs and trees with spines or thorns. Frequently found in agricultural areas, riparian areas, desert scrublands, savannas, and prairies. Also often seen along mowed roadsides with fence lines and utility poles.	None. No suitable habitat. No Critical Habitat in the project area.
Yellow Warbler (<i>Setophaga petechia</i>)	Breed in thickets and disturbed or regrowing habitats along streams and wetlands. Often found among willows. In the western U.S., they may be found at elevations up to 9,000 feet.	Potential for suitable habitat to be present. No Critical Habitat in the project area.
Grasshopper Sparrow (<i>Ammodramus savannarum</i>)	Grasslands, prairies, fields, and pastures with little or no cover and some bare ground. In the western U.S., may be found in brushy habitat.	None. No suitable habitat. No Critical Habitat in the project area.
Coastal Cactus Wren (<i>Campylorhynchus brunneicapillus sandiegensis</i>)	Preferred coastal habitat includes patches of prickly-pear and cholla cacti mixed with short sagebrush and buckwheat.	None. No suitable habitat. No Critical Habitat in the project area.
Arroyo Chub (<i>Gila orcuttii</i>)	Inhabits headwaters, creeks, small to medium rivers. Prefers areas of slow-moving streams with sand or mud substrate.	None. No suitable habitat. No Critical Habitat in the project area.
Dulzura Pocket Mouse (<i>Chaetodipus californicus femoralis</i>)	Coastal scrub, chaparral, and grassland. Possibly extirpated from Orange County.	None. No suitable habitat. No Critical Habitat in the project area.
Western Mastiff Bat (<i>Eumops perotis californicus</i>)	Arid, semiarid, and rocky canyon habitats in the desert. May utilize crevices and shallow caves on the sides of cliffs and rock walls, often located high above the ground, for roosts.	None. No suitable habitat. No Critical Habitat in the project area.

Table 3.9-3. State of California Special Status Species Potentially Occurring in the Project Area

Species	Habitat	Possibility of Occurrence in Project Area
Pocketed Free-tailed Bat (<i>Nyctinomops femorosaccus</i>)	Usually found in rugged canyons, high cliffs, and rock outcroppings in semiarid landscapes.	None. No suitable habitat. No Critical Habitat in the project area.
Pallid Bat (<i>Antrozous pallidus</i>)	Inhabits mountainous areas, intermontane basins, lowland desert scrub, deserts, and grasslands, often near rocky outcrops and water.	None. No suitable habitat. No Critical Habitat in the project area.
Southern California Legless Lizard (<i>Anniella stebbinsi</i>)	Inhabits a range of habitats, including coastal sand dunes, sandy washes, and alluvial fans.	None. No suitable habitat. No Critical Habitat in the project area.
California Glossy Snake (<i>Arizona elegans occidentalis</i>)	Prefers open areas with loose soil, but may be found in arid scrub, rocky washes, grasslands, and chaparral.	None. No suitable habitat. No Critical Habitat in the project area.
Western Pond Turtle (<i>Emys marmorata</i>)	Inhabits rivers, creeks, small lakes and ponds, marshes, canals, and reservoirs. This turtle may be found in brackish water.	Potential for suitable habitat to be present. No Critical Habitat in the project area.
Two-striped Gartersnake (<i>Thamnophis hammondi</i>)	An aquatic snake, generally found in or near permanent fresh water. This often includes streams with rocky beds bordered by willows and other riparian vegetation.	Potential for suitable habitat to be present. No Critical Habitat in the project area.
Coast Horned Lizard (<i>Phrynosoma blainvillii</i>)	Inhabit a variety of habitats, but often found in areas with sandy soil, scattered shrubs, and ant colonies. In California, it is most common in areas with native chaparral vegetation and porous soils.	None. No suitable habitat. No Critical Habitat in the project area.
Coastal Whiptail (<i>Aspidoscelis tigris stejnegeri</i>)	Inhabit a wide range of habitats, but primarily found in hot, dry, open areas with sparse foliage in chaparral, woodland, and riparian communities.	Potential for suitable habitat to be present. No Critical Habitat in the project area.
Red-diamond Rattlesnake (<i>Crotalus ruber</i>)	Utilize a wide range of habitats, but in southern California, is most commonly found in the western foothills of the Coast Ranges and in dry, rocky, inland valleys. Often inhabit granite outcroppings.	None. No suitable habitat. No Critical Habitat in the project area.

Source: California Department of Fish and Wildlife 2019; California Herps 2019a, 2019b; NatureServe 2019; The Cornell Lab 2019; USFWS 2019

Based on a review of the habitat requirements of the special status plant and animal species listed in Table 3.9-3, the potential for these plants or animals to be present at the CHFB site are low given the existing development and disturbed conditions at the site.

3.9.2 Environmental Consequences

To evaluate the impacts on biological resources, alternatives were reviewed for their potential to cause the following:

- Displacement of terrestrial or aquatic communities or loss of habitat
- Diminished value of habitat for wildlife, plants or aquatic species
- Interference with the movement of native resident or migratory wildlife species

- Conflicts with applicable management plans for terrestrial, avian and aquatic species and their habitat
- Introduction of noxious or invasive plant species
- Decline in native fish populations
- Impacts on or displacement of endangered, threatened or other protected status species
- Encroachment or impacts on designated critical habitat for a federally listed species

A significant adverse impact to biological resources would occur if the action would result in:

- Long-term loss, degradation or loss of diversity within unique or high-quality (e.g., riparian) plant communities
- Unpermitted “take” of federally listed species
- Local extirpation of rare or sensitive species not currently listed under the Endangered Species Act
- Unacceptable loss of critical habitat, as determined by the USFWS
- Violation of the MBTA or Bald and Golden Eagle Protection Act

3.9.2.1 No Action Alternative

Under the No Action Alternative, GSA would not construct a new USCIS building or relocate tenants to new offsite locations. Ongoing maintenance to the CHFEB would occur, which could generate negligible amounts of land disturbance and noise, and result in indirect negligible effects to biological resources.

3.9.2.2 Alternative 1

Construction

Alternative 1 would have negligible to minor direct impacts on biological resources within the 27.15-parcel to be retained. Construction of a new USCIS building would require ground disturbance and potential grading and clearing activities. However, there is limited vegetation present on the site, and that which is present is generally comprised of native and non-native and ornamental species used for landscaping. The 27.15-acre parcel primarily encompasses gravel areas used as parking lots. As such, very limited, low-quality habitat exists onsite, and direct impacts to vegetation or wildlife would be minimal. No direct effects would occur to the Aliso Creek riparian corridor as it is located outside of the CHFEB site and is separated by Alicia Parkway.

Indirect effects to biological resources arising from construction of Alternative 1 would be minor. There would be temporary increases in traffic, general human activity, and noise in the area, which would deter wildlife that commonly utilize the area, thereby diminishing their use of the land in and around the CHFEB site. As Alternative 1 includes construction in previously disturbed areas, impacts to species would be less than significant, as most species that inhabit areas near the CHFEB site are tolerant of humans. Approved species would be utilized for re-vegetation and landscaping, and appropriate steps would be taken to avoid introduction of invasive species (see Section 3.9.2.4 for further details regarding these measures). While noise could disturb the higher-quality habitat located to the west of the CHFEB site, these areas are separated by Alicia Parkway, an established roadway that would serve as a buffer to the construction activity performed under Alternative 1. Potential indirect effects to Aliso Creek would be minimized through use of required BMPs and permitting for protection of water quality and prevention of stormwater runoff described in Section 3.8.2.4.

No special status species are known or expected to inhabit the CHFEB site. Therefore, no impacts during construction are anticipated. It is feasible that migratory bird species may pass through the area, but due to

the lack of suitable foraging or nesting habitat on the site, any potential measurable impacts would be unlikely.

Operations

No direct impacts to biological resources are anticipated during operations of Alternative 1, including from disposal of the remaining 64.85 acres of the CHF B site, operations of the new USCIS building, or off-site leasing of new office space in locations throughout the region.

Future Redevelopment

Under a renovation scenario, indirect impacts could occur from renovation of the existing CHF B on the remaining 64.85-acre parcel to be disposed. Indirect impacts to vegetation could occur during construction from the establishment of staging areas; impacts, however, would likely be negligible as the existing vegetation is maintained landscaping and has little habitat value. Minor indirect impacts to wildlife could occur due to noise generated during construction. Noise could deter wildlife from the site, but due to the disturbed nature of the property, such impacts would likely be negligible.

Under a demolition/new construction scenario, indirect impacts could occur from demolition of the existing CHF B and new construction on the remaining 64.85-acre parcel to be disposed. Under this scenario, there could be minor impacts to vegetation and wildlife during construction. Impacts would likely be similar to those described for construction of the new USCIS building but could be to a greater intensity as development could occur over a larger area. Excavation may be required, which could affect any existing onsite vegetation and indirectly affect wildlife due to noise and increased human activity at the site. Construction activity could increase sedimentation and runoff into Aliso Creek; however, such impacts would likely be negligible and avoided through adherence to applicable permit provisions and standard BMPs (see Section 3.8.2.4 for a summary of impact reduction measures).

No impacts to biological resources are anticipated during operations of a renovation or demolition/new construction scenario.

Follow-on NEPA or CEQA analyses may be required (depending on who acquires the site) for any proposed redevelopment plans presented by a future developer, to include further consideration of biological resources, once final development plans are completed.

3.9.2.3 Preferred Alternative (Alternative 2)

Under the Preferred Alternative, there would be no direct impacts to biological resources during construction or operations. All tenants would be removed from the CHF B, and no construction would occur at the site. Off-site leasing of new office space may require office buildouts; however, these buildouts would not require ground disturbance, and no impacts to biological resources would occur. There would be no impacts to biological resources from disposal of the CHF B site.

Future Redevelopment

Under a renovation/new construction scenario, adverse indirect impacts could occur from renovation of the existing CHF B and new construction on the south or west end of the 92-acre site to be disposed. Under this scenario for the Preferred Alternative, there could be minor indirect impacts during construction, similar to as described for construction of the new USCIS building, but to a greater intensity. Minor impacts to existing, low-quality vegetation could occur during renovation, clearing, and grading activities, and indirect noise impacts could deter wildlife from utilizing the site for shelter or foraging. Construction activities could also increase sedimentation and runoff into Aliso Creek; however, impacts would likely be negligible to minor due to the current low-quality habitat provided by the waterway and adherence to applicable permit provisions and standard BMPs.

Under a demolition/new construction scenario, indirect impacts could occur from demolition of the existing CHF B and new construction on the 92-acre site to be disposed. Under this scenario for the Preferred

Alternative, there could be minor indirect impacts to biological resources during construction. Impacts would likely be similar to those described under Alternative 1 Future Redevelopment (demolition/new construction scenario) but could be to a greater intensity as up to 92 acres of the site could be affected.

Operations of a renovation/new construction scenario and a demolition/new construction scenario would likely be similar to those described for construction of a new USCIS building under Alternative 1. No additional impacts to biological resources would be expected during operations.

Similar to Alternative 1, follow-on NEPA or CEQA analyses may further address biological resources once final development plans are completed.

3.9.2.4 Impact Reduction Measures

In order to avoid or minimize impacts to vegetation, only approved species would be used for revegetation. These plant species would not be invasive or noxious species, and all disturbed soils would be revegetated following each phase of construction. If invasive species are disposed in an area proposed for disturbance, they would be removed. To avoid introducing an invasive species, all equipment, including clothes and shoes, would be assessed to guarantee they are free of seeds prior to entering the work area.

Surveys for migratory birds would be conducted if ground disturbance is conducted within the nesting seasons; however, as stated in Section 3.9.1.3, the potential for these species to be present at the CHFB site are low given the existing development and disturbed conditions at the site. If necessary, such surveys would be conducted no more than 10 days prior to vegetation removal for project activities that occur within California bird breeding season, which extends from February 1 through August 31. Surveys would be conducted at any buildings or structures proposed for construction or demolition and in any natural areas directly affected by project activities. Surveys would include the disturbance area and a 500-foot buffer around the disturbed area, as feasible. Any nests, with the exception of eagles' nests, identified on the premises during the pre-breeding season surveys would be removed, as long as no eggs are present. If a nest with eggs is found, activities in the disturbance area and buffer area would be halted until the eggs hatched and the young fledged.

Similar measures may be required and implemented for any future development on the site as part of Alternatives 1 and 2, regardless of ownership.

3.10 TRANSPORTATION AND TRAFFIC

This section assesses the potential for existing transportation infrastructure within the project study area to be affected by the implementation of the project alternatives.

3.10.1 Affected Environment

The Federal Highway Administration (FHWA) is a division of the United States Department of Transportation that specializes in highway transportation. The FHWA supports state and local governments in the design, construction, and maintenance of the Nation's highway system (Federal Aid Highway Program) and various federally and tribal owned lands (Federal Lands Highway Program). Through financial and technical assistance to state and local governments, FHWA is responsible for ensuring that America's roads and highways continue to be among the safest and most technologically sound in the world.

The California Department of Transportation (Caltrans) is the state agency responsible for highway, bridge, and rail transportation planning, construction, and maintenance. Caltrans manages more than 50,000 miles of California's highway and freeway lanes. Caltrans seeks to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability.

The City of Laguna Niguel General Plan provides goals, policies, and implementation programs for motorized and non-motorized transportation to provide a safe, comprehensive, and integrated system of facilities for all users. The General Plan provides roadway classifications and capacities for the various arterials within the City (City of Laguna Niguel, 1992a).

The study area for potential traffic impacts includes the local roadways within close proximity to the CHFB site, State Route 73 (SR-73) and Interstate 5 (I-5). SR-73 and I-5 serve as the primary highways in the region providing direct access to arterials that lead to the CHFB site. Existing local roadways located within the study area, primarily within the existing CHFB site and surrounding area are discussed below.

3.10.1.1 Existing Traffic Conditions

The CHFB site is generally bound by Avila Road to the north, Aliso Creek Road to the south, El Lazo to the east, and Alicia Parkway to the west (refer to Figure 2-2 in Chapter 2). El Lazo Road is a two-lane roadway that currently runs along the east and south side of the CHFB parking lot. Allegra Road, Shelley Road and Dorine Road provide direct access to the CHFB site from the surrounding arterials. Direct access to and from SR-73 is provided via La Paz Road. The most direct route to and from the I-5 would be traveling east on Avila Road or Aliso Creek Road, then south on Moulton Parkway, then east on Crown Valley Parkway leading to the I-5 northbound and southbound ramps.

There are currently seven vehicular access points leading to the surface parking lots surrounding the CHFB site. Two of the seven access points are signalized intersections while the remaining five are two-way stop-controlled intersections. The signalized intersection of Avila Road/Federal Building Parkway provides access to the parking lots in the northeast quadrant of the site. The second access that is signalized is Alicia Parkway/Fed Loading Dock. Entrance to the parking lots onsite are not restricted by guard stations or gates with the exception of two entrances. The loading docks near the signal at the Alicia Parkway entrance located on the west side of the CHFB is secured with an iron gate and guard station. Entrances to the smaller parking lots on the north side of the CHFB have unmanned control gates with key card access and tire shredders.

A brief description of the existing transportation network including the highways, arterials, and local roadways surrounding the CHFB site is provided below:

I-5 is a major north-south route of the Interstate Highway System that runs through Orange County connecting San Diego and Los Angeles. I-5 is located directly east of the CHFB site and provides regional access to the site for federal employees. East of the site, I-5 consists of four travel lanes in each direction with one high occupancy vehicle lane in each direction and one auxiliary lane in each direction between

the interchanges at Crown Valley Parkway and Avery Parkway. Both interchanges serve as a major connection point to arterials that lead to the CHFB site.

SR-73 is a north-south toll road connecting I-5 in San Juan Capistrano to Interstate 405 in Costa Mesa. The entirety of the route is located within Orange County. SR-73 runs along the east and north side of the CHFB site. East of the site, SR-73 between Moulton Parkway and Greenfield Drive is constructed as a seven-lane highway with three lanes northbound and four lanes southbound. From SR-73, the Greenfield Drive and La Paz Road interchanges would serve as the closest connections to arterials leading to the CHFB site.

Avila Road is an east-west divided roadway with four travel lanes from Alicia Parkway to La Paz Road. According to the City of Laguna Niguel's General Plan Circulation Element, La Paz Road is functionally classified as a four-lane Primary Arterial with a capacity of 37,500 vehicles per day. A full access driveway to the CHFB site and northern parking lots are provided via Avila Road. Dedicated bike lanes (Class II) are provided on both sides of the roadway along the project frontage. Sidewalks are also provided on both sides of the road. On-street parking is prohibited on both sides of Avila Road.

Alicia Parkway is a north-south divided roadway with six travel lanes along the project frontage from Avila Road to Aliso Creek Road. According to the City of Laguna Niguel's General Plan Circulation Element, Alicia Parkway is functionally classified as a six-lane Major Arterial with a capacity of 56,300 vehicles per day. A signal on Alicia Parkway provides vehicle and truck access to the CHFB site and parking lots. Alicia Parkway connects with El Lazo which provides access to the parking lots on the southern portion of the site. Class II bike lanes and sidewalks are provided on both sides of the road. On-street parking is prohibited on both sides of Alicia Parkway.

El Lazo is a two-lane undivided roadway that runs along the eastern and southern border of the CHFB site. This road is functionally classified as a Secondary Arterial with a capacity of 25,000 vehicles per day according to the City of Laguna Niguel's General Plan Circulation Element. This roadway was built to accommodate four travel lanes (two lanes in each direction) but is currently striped as one lane in each direction. On-street parking is allowed on both sides of the road. Sidewalks are also provided on both sides of the road. El Lazo provides direct access to the surface parking lots on the southern and eastern portions of the site.

La Paz Road is a north-south divided roadway with six travel lanes from the SR-73 northbound on/off ramps to Aliso Creek Road. According to the City of Laguna Niguel's General Plan Circulation Element, La Paz Road is functionally classified as a six-lane Major Arterial with a capacity of 56,300 vehicles per day. Class II bike lanes and sidewalks are provided on both sides of the road. On-street parking is prohibited on both sides of the road. La Paz Road intersects with Allegra Road and Shelley Road that provides direct access into the CHFB site and parking lots. North of the site, La Paz Road provides direct access to SR-73. South of the site, La Paz Road connects with Crown Valley Parkway that leads directly to I-5.

Aliso Creek Road is an east-west divided roadway with six travel lanes between Alicia Parkway to La Paz Road and then transitions to a four-lane roadway from La Paz Road to Moulton Parkway. According to the City of Laguna Niguel's General Plan Circulation Element, Aliso Creek Road is functionally classified as a six-lane Major Arterial from Alicia Parkway to La Paz Road with a capacity of 56,300 vehicles per day. From La Paz Road to Moulton Parkway, La Paz Road is functionally classified as a four-lane Primary Arterial with a capacity of 37,500 vehicles per day. Class II bike lanes and sidewalks are provided on both sides of the road. Aliso Creek Road connects with Moulton Parkway to the east and Moulton Parkway connects to Crown Valley Parkway and the I-5 freeway. On-street parking is prohibited on both sides of the road.

Moulton Parkway is a north-south divided roadway with six travel lanes from Avila Road to Crown Valley Parkway. According to the City of Laguna Niguel's General Plan Circulation Element, Moulton Parkway is functionally classified as a six-lane Major Arterial with a capacity of 56,300 vehicles per day. Class II bike lanes and sidewalks are provided on both sides of the road. From the CHFB site, Moulton Parkway

leads to Oso Parkway which then connects to the I-5 but also leads to Crown Valley Parkway south of the site.

Crown Valley Parkway and **Oso Parkway** are both east-west divided roadways with six travel lanes. According to the City of Laguna Niguel's General Plan Circulation Element, Crown Valley Parkway and Oso Parkway are functionally classified as six-lane Major Arterials with a capacity of 56,300 vehicles per day. Class II bike lanes and sidewalks are provided on both sides of the two roadways. Crown Valley Parkway and Oso Parkway provide direct access to and from the I-5 freeway.

Dorine Road, Allegra Road, and Shelley Road are two-lane undivided roadways that provide direct access to the CHFB site. Allegra Road and Shelley Road connects La Paz Road to El Lazo Road. Dorine Road connects Aliso Creek Road to Dorine Road. According to the City of Laguna Niguel's General Plan Circulation Element, these three roadways are functionally classified as two-lane Secondary Arterials with a capacity of 25,000 vehicles per day. Sidewalks are provided on both sides of these roadways and on-street parking is permitted on both sides. Class II bike lanes are not provided on any of these roadways. These roadways were built to accommodate four travel lanes but are only striped as one lane in each direction.

Level of Service

Current roadway and intersection operations were reviewed at locations surrounding the CHFB site. Based on recent traffic data and analysis conducted for the Laguna Niguel City Center Project, the Traffic Impact Analysis dated December 18, 2019 was used to assess current levels of service at intersections surrounding the CHFB site. Level of service (LOS) is a term used to qualitatively describe operating conditions of a roadway based on factors such as speed, travel time, maneuverability, delay and safety. LOS ranges from LOS A (free-flow conditions) to LOS F (severely congested conditions). Traffic impact analyses are typically focused on evaluating traffic operations during the morning and evening commute peak hours (7:00 to 9:00 AM and 4:00 to 6:00 PM) on a typical weekday because these are generally when the busiest traffic conditions occur. The City of Laguna Niguel considers LOS D or better to be acceptable operating conditions and LOS E or F to be deficient operating conditions according to the City's General Plan Circulation Element (City of Laguna Niguel, 1992a). Daily traffic volumes on major arterials throughout the City of Laguna Niguel were provided by City staff and utilized in the review of existing capacity on roadways surrounding the CHFB site.

According to the intersection analysis conducted in the Laguna Niguel City Center Project Traffic Impact Analysis, Alicia Parkway at Aliso Creek Road, La Paz Road at Aliso Creek Road, Moulton Parkway at Aliso Creek Road, and La Paz Road at Pacific Park Drive are all intersections currently operating at acceptable levels of service (LOS D or better). In addition, the analysis indicates the I-5 northbound and southbound ramp intersections at Crown Valley Parkway are also currently operating at acceptable levels of service. The LOS analysis shows there is available capacity at the study intersections mentioned above.

Daily traffic volumes collected in 2017 were reviewed from a capacity perspective along Alicia Parkway, Aliso Creek Road, La Paz Road, Moulton Parkway and Crown Valley Parkway. These roadways either surround the CHFB site and/or provide access to the I-5 and SR-73. All of the roadways mentioned are currently built as six-lane facilities with a capacity of 56,300 vehicles per day. Daily traffic volumes (2017) range from 9,900 to 46,200 vehicles per day on these specific roadways. The majority of the roadways surrounding the CHFB site are currently operating under 50 percent capacity. Crown Valley Parkway near the I-5 currently carries 46,200 vehicles per day with an 82 percent capacity (i.e., 46,200 / 56,300). This indicates there is available capacity on roadways surrounding the CHFB site, but potentially limited capacity on Crown Valley Parkway near the I-5 interchange. However, performance and capacity of a roadway segment is heavily influenced by the ability of intersections to accommodate peak hour volumes; therefore, intersection operations are a better indication of capacity within a roadway network and used in this analysis to evaluate future capacity and potential traffic impacts.

3.10.1.2 Public Transit

Orange County Transit Authority operates the local bus service in Laguna Niguel and several neighboring cities throughout Orange County. Bus route 87 travels along Alicia Parkway from Rancho Santa Margarita to Laguna Niguel. Route 87 currently provides bus stops located within a ¼ mile walking distance from the CHFB site. Service is provided Monday through Friday with one-hour headways, no weekend service is provided. Amenities at the bus stops are limited to only a sign with no benches or shelters. The Laguna Niguel Metrolink Rail Station is located approximately 2-miles from the CHFB site.

3.10.2 Environmental Consequences

To evaluate the impacts on transportation facilities, alternatives were reviewed for their potential to cause the following:

- Change in pedestrian and bicycle activity
- Change in vehicular trips generated by the site
- Increase traffic volumes on existing roadway segments and intersections within the project study area
- Change in vehicle miles traveled (VMT) per employee

A significant adverse impact to transportation facilities would occur if the action would result in:

- Increase in traffic volumes that would exceed the capacity of local roadways and intersections within the study area
- Increase in traffic volumes result in deficient operations at study roadways and intersections
- Construction traffic creating a prolonged impact on travel conditions or facilities, including inadequate emergency vehicle access, traffic hazards to pedestrians and bicyclists, or substantial truck traffic on roadways not designated as truck routes
- Disruption or interference with existing pedestrian and bicycle facilities and creating inconsistencies with adopted pedestrian or bicycle system plans, guidelines, policies, or standards
- Change (increase) in average VMT per employee

3.10.2.1 No Action Alternative

Under the No Action Alternative, GSA would not construct a new USCIS building or relocate tenants to new offsite locations. Therefore, trip generation and distribution of traffic on the local and regional roadways would be unchanged from existing conditions. In addition, there would be no construction activity on site and as such there would be no construction-related impacts. Ongoing maintenance to the CHFB would occur, which is consistent with existing operations and would not change existing traffic volumes or operations on the transportation system.

As there would be no change to trip generation or distribution of trips on the roadway network, this alternative would result in no direct or indirect impacts related to transportation facilities beyond those occurring under existing conditions.

3.10.2.2 Alternative 1

Construction

Under Alternative 1, construction of the new 380,000 square foot USCIS building is scheduled to take approximately 30 months to complete. Peak construction could last up to 15 months with a potential maximum of 300 construction workers and 90 to 100 trucks per day for deliveries and waste removal. Construction of the new USCIS building could cause minor temporary impacts to nearby roadways and

intersections, specifically along Alicia Parkway, Aliso Creek Road, La Paz Road and El Lazo. Haul routes to/from the construction site to disposal sites have not yet been identified, however the temporary impacts should be limited to the roadways and intersections utilized along these routes. Temporary changes to onsite access due to construction may change travel patterns that could result in temporary indirect impacts to nearby intersections. As needed, GSA would obtain encroachment permits and coordinate with Caltrans for any work proposed in the vicinity of the state right-of-way.

Construction would involve temporary pedestrian sidewalk closures. Pedestrian sidewalks along the perimeter of the CHFB site would be closed during the construction period. As such, pedestrians would be directed to utilize the sidewalks on the other side of the street. Thus, temporary indirect impacts would occur on pedestrian facilities along the project frontage during construction.

Operations

Under Alternative 1, there would be no long-term, adverse direct impacts during operations compared to existing conditions at the CHFB site. Specific office locations of the approximately 1,000 staff to be relocated have not been identified. However, it is anticipated at least 55 percent of the remaining tenants would relocate in south or central Orange County no farther north than Irvine, with as many as 45 percent of the remaining tenants relocating to areas north of Irvine such as Santa Ana, Anaheim, or Long Beach. Trips associated with the relocation of staff would most likely redistribute traffic throughout the County and most likely result in a reduction of AM and PM peak hour traffic volumes and delay at intersections surrounding the CHFB site. VMT per employee is based on the number of employees and the total trip length for each employee. The VMT for the existing employees would remain unchanged for those employees that will remain onsite.

From a trip generation perspective, the new USCIS building with approximately 2,000 employees would generate less traffic than the existing CHFB building with approximately 3,000 employees. The reduction in 1,000 employee trips would result in a beneficial impact. Project-related traffic volumes on study roadway segments and intersections would be less than current traffic volumes. Therefore, no significant long-term adverse impacts are expected to occur on roadway segments and intersections within the study area based on the new USCIS building compared to the existing CHFB building. Relocation of 1,000 employees would likely provide a beneficial impact to the LOS at intersections surrounding the CHFB site and intersections near the I-5 and SR-73.

During operations, there would be no direct long-term adverse impacts to the existing pedestrian and bicycle facilities surrounding the new USCIS building. Following construction, pedestrian and bicycle facilities adjacent to the new USCIS building would be similar to what exists today.

Employee VMT for those employees relocated may be impacted depending upon the location of their new office space within the region. Therefore, there may be direct, adverse VMT impacts associated with the relocation of employees to offsite locations. However, for purposes of this analysis, it is assumed traffic impacts associated with the increased traffic to future offsite office locations has been considered in previous CEQA analyses when the respective office buildings were originally reviewed and approved by local City staff. Relocation of individuals to other leased office space throughout the region as part of Alternative 1 would not generate additional or greater traffic impacts at the leased site locations beyond those disclosed during CEQA approvals, and overall impacts would be less than significant.

Future Redevelopment

Under a renovation scenario, minor temporary impacts are likely to occur during the construction period. There could be temporary increases in traffic due to construction vehicles as well as some potential road closures; however, considering existing LOS of local intersections, impacts would likely be short term and minor. Additionally, trip reductions associated with the relocation of 1,000 employees is likely to be greater than the small and local construction trips required for renovation of the existing CHFB. Closure of

sidewalks and bike lanes are not anticipated and therefore, negligible and temporary impacts would likely occur on nearby pedestrian and bicycle facilities.

During operations of a renovation scenario, it is assumed a similar number of employees could occupy the renovated CHFB structure as compared to current occupancy levels of the CHFB (i.e. up to 3,000 workers). When considered with the 2,000 USCIS employees to remain on site, this would represent a net increase of up to 2,000 additional employees on the 92-acre site. The net increase of 2,000 employees traveling to the site could increase daily and peak hour traffic volumes at study intersections and roadway segments which could worsen LOS at study locations surrounding the site. Therefore, there could be minor to moderate long-term impacts at study intersections as a result of 2,000 additional employees traveling to and from the site. Depending on the home-to-work trip length of the 2,000 new employees, there may be significant long-term VMT impacts.

Under a demolition/new construction scenario, minor, short-term impacts may occur from demolition of the existing CHFB and new construction on the remaining 64.85-acre parcel to be disposed. Under this scenario, impacts would likely be similar to as described for construction of a new USCIS building, but could be to a greater intensity as development could be on a larger scale and extend for a longer period of time. A greater amount of construction vehicles and worker trips could be required, resulting in short-term, minor impacts. Demolition of the existing CHFB and associated waste removal could result in short-term minor impacts to local roadways and intersections based on the routing to disposal sites. In addition, there could be short-term impacts to the immediate study roadways, intersections, pedestrian and bicycle facilities during construction due to potential road and sidewalk closures.

Impacts during operations of a demolition/new construction scenario would likely be similar to as described for operations of the renovation scenario, but to a larger extent and intensity. Future use of the site that is disposed (64.85-acres) would be dictated by the new owner and the City of Laguna Niguel rezoning process (as applicable). Because a developer is not known at this time, no detailed plan exists for redevelopment of the property. This includes unknown density and composition of future commercial, residential, or mixed-use development that could occur. There may be a change in existing land use of the property which could change travel patterns, traffic volumes within the study area, and VMT. Impacts to study roadway segments, intersections and VMT may be moderate to significant, depending on the extent of redevelopment and the number of net new trips generated by the site.

Follow-on NEPA or CEQA analysis may be required (depending on who acquires the site) for any proposed redevelopment plans presented by a future developer, to include further consideration of potential traffic impacts. As part of this documentation, trips generated by the new development may be considered and compared to the existing CHFB to determine if there are net new trips or a reduction in trips. If there are net new trips generated under this scenario, the roadway segments and intersections along with pedestrian and bicycle facilities within the study area may be analyzed to determine if any significant impacts occur.

3.10.2.3 Preferred Alternative (Alternative 2)

Under the Preferred Alternative, there would be short-term minor beneficial impacts on transportation facilities. All tenants would be removed from the CHFB similar to Alternative 1. Off-site leasing of new office space may require office buildouts; however, these buildouts would not require ground disturbance, and no impacts to transportation facilities would occur. Trips associated with the relocation of staff would most likely redistribute traffic throughout the County and most likely result in a reduction of peak hour traffic volumes and delay at intersections surrounding the CHFB site, similar to as described under Alternative 1, but to a greater extent as there would be a net reduction of approximately 3,000 trips per day to the site. Employee VMT for those employees relocated may be impacted depending upon the location of their new office space within the region. Therefore, there may be direct, adverse VMT impacts associated with the relocation of employees to offsite locations. However, for purposes of this analysis, it is assumed traffic impacts associated with the increased traffic to future offsite office locations has been considered in previous CEQA analyses when the respective office buildings were originally reviewed and approved by

local City staff. Relocation of individuals to other leased office space throughout the region as part of the Preferred Alternative would not generate additional or greater traffic impacts at the leased site locations beyond those disclosed during CEQA approvals, and overall impacts would be less than significant.

Future Redevelopment

Under both a renovation/new construction and demolition/new construction scenario, minor to significant indirect impacts could occur. Impacts during construction and operation would likely be similar to as described under Alternative 1 Future Redevelopment (demolition/new construction scenario), and would be dependent upon the size and scope of new development to occur on the parcel. Impacts could be to a greater extent and intensity under a demolition/new construction scenario, depending on the scale of new development and required construction trips. In the longer term, future use would be dictated by the new owner and the City of Laguna Niguel rezoning process (as applicable). Because a developer is not known at this time, no detailed plan exists for redevelopment of the property. This includes unknown density and composition of future commercial, residential, or mixed-use development that could occur. There may be a change in existing land use of the property which could change travel patterns, traffic volumes within the study area, and VMT. Impacts to study roadway segments, intersections and VMT may be moderate to significant, depending on the extent of redevelopment and the number of net new trips generated by the site.

Similar to Alternative 1, follow-on NEPA or CEQA analysis may be required (depending on who acquires the site) for any proposed redevelopment plans presented by a future developer, to include further consideration of potential traffic impacts. As part of this documentation, trips generated by the new development may be considered and compared to the existing CHFB to determine if there are net new trips or a reduction in trips. If there are net new trips generated under this scenario, the roadway segments and intersections along with pedestrian and bicycle facilities within the study area may be analyzed to determine if any significant impacts occur.

3.10.2.4 Impact Reduction Measures

Measure that would reduce impacts related to transportation during construction and operations are discussed below.

- Minimize construction vehicle movement during peak traffic hours;
- Place construction staging areas where they would least interfere with local traffic and parking;
- Minimize detours and impacts to pedestrians and bicyclists during construction activities, to include by providing appropriate information and signage to pedestrians and motorists who are traveling throughout the area;
- Prepare a Traffic Management Plan to minimize traffic delays and maintain traffic safety during construction;
- To the extent possible, provide appropriate connections to bike lanes located along Alicia Parkway, Avila Road, La Paz Road, and Aliso Creek Road;
- Provide onsite bike storage at newly constructed facilities;
- Provide designated areas/parking for freight and package delivery, and direct deliveries to the loading dock area;
- Establish pick-up point service and/or automated parcel systems to allow for deliveries that can be made with one truck stop;

- Develop and implement Transportation Demand Management strategies to reduce single occupancy vehicles and encourage walking, biking, using public transit, carpooling, flexible work schedules and telecommuting;
- Implement traffic signal coordination on arterial streets where practical to maximize the efficiency of the intersections and roadway network;
- Coordinate with local, state and federal transportation authorities when planning access to the CHFB site; and
- Follow all local, state and federal planning guidelines and regulations when maintaining or upgrading roadway infrastructure.

Similar measures may be required and implemented for any future development on the site as part of Alternatives 1 and 2, regardless of ownership.

3.11 HAZARDOUS WASTE AND MATERIALS

Specific environmental statutes and regulations govern hazardous material and hazardous waste management activities at federal operations and facilities. For this analysis, the terms hazardous waste, hazardous materials, and toxic substances include those substances defined as hazardous by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and the Spill Prevention, Control, and Countermeasures (SPCC) Rule. In general, they include substances that, because of their quantity, concentration, or physical, chemical or toxic characteristics, may present moderate danger to public health or welfare or the environment when released into the environment. The purpose of CERCLA, often referred to as Superfund, is to clean up contaminated sites so that public health and welfare are not compromised. RCRA provides for “cradle to grave” regulation of hazardous wastes. Other federal laws applicable to hazardous waste and materials include:

- Community Environmental Response Facilitation Act (CERFA) of 1992;
- Clean Water Act (CWA);
- Clean Air Act (CAA);
- Safe Drinking Water Act (SDWA);
- Occupational Safety and Health Administration (OSHA);
- Atomic Energy Act (AEA);
- Toxic Substances Control Act (TSCA); and
- Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).

In addition to the acts and laws mentioned above, EO 12088, *Federal Compliance with Pollution Control*, mandates that necessary actions be taken to prevent and control environmental pollution when federal activities or federal facilities are involved. Hazardous waste in California is regulated primarily under the authority of the federal RCRA of 1976 and the California Health and Safety Code. Other California laws regarding hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup and emergency planning. Worker health and safety and public safety are key issues when dealing with hazardous materials that may affect human health and the environment. Proper disposal of hazardous material disturbed during project construction is vital to ensure protection of human health and the environment

3.11.1 Affected Environment

The ROI for hazardous waste and materials is the 92-acre CHFB site, which consists of two parcels. The first parcel, located at 24000 Avila Road, Laguna Niguel, California, is 86.5 acres and includes the CHFB and surrounding parking lots, basketball courts, roads and driveways, landscaped areas, as well as other supporting facilities such as guard stations, a reservoir for fire suppression, a 500,000-gallon water tank that services the fire protection system, and a maintenance warehouse. The CHFB site also includes a large 3,840-cell photovoltaic system on the roof of the building that produces 914 kilowatts of electricity annual to support building operations (GSA 2019a). The second parcel houses the CUP and is located directly across the street on the north side of Avila Road at 23731 Avila Road, on the corner of Alicia Parkway and Avila Road. The CUP property is 5.5 acres and includes chillers, boilers, cooling tower, and other utility infrastructure (i.e., Southern California Edison’s Niguel substation) (GSA 2017a). The overall 92-acre site is located approximately 160 to 240 feet above mean sea level, with a generally flat topography sloping gently downward to the south.

Activities at the CHFEB have been evaluated in two Phase I ESAs. The first ESA was performed in 2018 for the 27.15-acre parcel planned for construction of a new USCIS building under Alternative 1 (GSA 2018b), and a second ESA was performed for the entire 92-acre CHFEB site in 2019 (GSA 2019d). The Phase I ESAs were used to establish the existing conditions at the CHFEB and to evaluate the consequences of the Proposed Action Alternatives and the No Action Alternative with respect to hazardous waste and materials. Information from a Lead-Based Paint Survey and Management Plan (GSA 2005), and Asbestos Removal/Stabilization Project Study (GSA 2017b) was also used to document existing conditions and environmental consequences from the alternatives considered.

Development at the CHFEB site first occurred between 1967 and 1970 when the CHFEB was constructed. Prior to GSA’s ownership of the property, the site was generally undeveloped or used for agriculture. Therefore, residual contamination from historic use of pesticides and herbicides may be present in soils underlying the site as identified in the most recent (2019) Phase I ESA. The Phase I ESAs did not identify any visible signs of contamination including surface staining or stressed vegetation, or the presence (either currently or historically) of facilities such as petroleum storage tanks or solid waste disposal areas that would suggest the possibility of past contamination. The Phase I ESAs also did not uncover any specific evidence to suggest that any past contamination or cleanup had occurred on site, and the location is not listed in any databases of known contaminated sites.

Hazards and potential hazards associated with the CHFEB are further discussed below.

Asbestos-Containing Materials

Due to the age of the CHFEB, ACM are known or suspected to be present throughout the building. Asbestos is commonly used in older buildings for insulation and fireproofing and can present various health risks including respiratory illnesses, permanent lung damage, and cancer (ATSDR 2020). Asbestos fibers typically do not present a health hazard when they are encapsulated within ACM that is in good condition. However, these fibers can become airborne when ACM is either damaged or disturbed or becomes degraded, and may be inhaled by building occupants. The USEPA considers regulated ACM to be ACM that is friable, sufficiently degraded such that it can become friable, or non-degraded asbestos that is likely to be damaged and become friable during construction and demolition activities (Millennium Consulting Associates 2017). Regulated ACM at the CHFEB primarily consist of spray-on fire resistive material (SFRM) and thermal system insulation (TSI) wrap. Table 3.11-1 identifies known locations of ACM at the CHFEB.

Table 3.11-1. Locations of ACM at the CHFEB

Description of ACM	Location	Quantity
Spray-applied fire resistive material	1 st floor	133,500 sq ft
Drywall/joint compound	Basement, 1 st , 2 nd , 3 rd , 4 th , 5 th , 6 th , 7 th floors	267,990 sq ft
Thermal system insulation	Basement, 1 st , 2 nd , 3 rd , 6 th floors, roof, pipe chase	10,058 sq ft
Floor tile/mastic	Basement, 1 st , 2 nd , 3 rd , 4 th , 5 th , 6 th floors	402,934 sq ft
Wall texture coating/Plaster/Stucco	1 st , 2 nd floors, roof	17,470 sq ft
Cinderblock	1 st floor	350 sq ft
Transite paneling	Building exterior	32,000 sq ft
Window glaze compound	Building exterior	957 sq ft
Above-ceiling dust	All interior ceilings	Throughout

Source: Millennium Consulting Associates 2017
ACM = asbestos-containing material, sq ft = square feet

At the CHFB, asbestos-containing SFRM was applied to the steel framing for the first-floor roof structure and poses the greatest asbestos-related hazard (GSA 2017b). The SFRM is friable, meaning that if it is damaged by physical contact, or shaken loose by building vibration or movement (e.g., from a seismic event) it can be turned to dust and released into the air. Asbestos containing dust has been found in numerous locations at the first floor ceiling space, including interstitial areas under the second-floor concrete slab, beyond the areas with structural steel overhead.

Asbestos-containing TSI, or pipe wrap, is primarily present in first, second, and third floor spaces (Millennium Consulting Associates 2017). While considered regulated ACM, TSI is generally in good condition and does not present an immediate hazard. Other sources of regulated ACM include drywall and joint compound (present on all floors), wall texture compound (first and second floors), transite tiles (building exterior), and valve wrap (first and second floors).

Other sources of ACM include floor tile, roofing system mastic, and fireproofing cores in common-area doors, all of which are not as friable and pose a lesser health hazard. Some of the ACM at the CHFB has been abated (i.e., removed and cleaned up) under past projects. Past abatement projects included work carried out in the 1980s to remove ACM-containing SFRM from floors 2 and 3 of the building.

In addition to ACMs present in building components, asbestos debris, likely associated with SFRM, is present above the first-floor ceiling tiles. Further, asbestos-containing dust has been identified above ceiling tiles on all floors of the building, although the source of this dust on the upper floors has not yet been identified. In order to reduce the potential for occupant exposure to asbestos, the above-ceiling plenum space is designated as a “controlled space” and entry into this space is restricted unless permitted by building management (Millennium Consulting Associates 2017).

Asbestos air-sampling is conducted periodically at the CHFB and was most recently completed in February 2020. Air samples were collected in common areas, storage rooms, file rooms, and in occupied office spaces throughout the building. Sampling results continue to indicate there are no recognized health hazards from air borne asbestos in areas sampled in the building, and levels are below USEPA thresholds (USPHC 2020).

Lead-Based Paint

Lead contaminated surfaces are known or suspected to be present at the CHFB site due to the age of the building. Lead was commonly used as an additive to enhance the properties of structural paint until 1978, when its use as a paint ingredient was banned. Older lead-based paint (LBP) that is deteriorating (i.e., chipping, peeling, or cracking) may eventually generate lead-containing dust that can be inhaled or ingested. Young children and pregnant women are especially vulnerable to the health effects of lead, which can damage developing brains nervous systems and lead to developmental issues (CDC 2020). In adults, lead exposure can cause cardiovascular effects including high blood pressure, decreased kidney function, and reproductive problems.

A 2006 survey of LBP conducted at the CHFB identified seven locations where lead was present in paint at levels high enough (i.e., greater than 0.7 mg/cm²) to be considered LBP. These areas include walls, stairs, and ceilings. In addition, several areas throughout the building contain lead paint that, while not meeting the LBP threshold, are still covered under OSHA provisions for construction work. Furthermore, it is likely that some of the paint used to mark the parking lots and roads, particularly the older deteriorated lots on the southern end of the site, could contain lead.

California regulations (8 CCR 1532.1) define lead-related construction work as any construction activity that may result in significant occupational exposure of individuals to lead. The State of California does not distinguish between LBP and paint that contains lead at a lower concentration. Materials determined to contain greater than 5,000 ppm are considered LBP.

Petroleum and Hazardous Materials Storage Tanks

Six USTs were removed from the CHFB in 1993, including tanks used to store diesel, gasoline, used oil, and sulfuric acid. Currently, the site has one 4,000-gallon UST that is used to store diesel for the emergency generator and diesel fire pump. An additional diesel-fired emergency generator located outside the southwest corner of the CHFB has a belly tank with an estimated capacity of 3,000 gallons (GSA 2019d).

Soil contamination from leaking USTs was identified on-site at two storage tank areas in the western and southern portions of the property. Soil in the western storage tank area was found to be impacted with benzene, toluene, ethylbenzene, and xylene (BTEX) up to 11, 48, 14, and 91 parts per billion (ppb), respectively. Soil near USTs south of the building was found to be impacted with total petroleum hydrocarbons as diesel (TPHd) up to 220 parts per million (ppm). A total of 1,800 cubic yards of impacted soil was removed near USTs west of the building, and a total of 70 cubic yards of impacted soil was removed south of the building. Impacted soil was transported to a local landfill for disposal. Additional soil sampling was performed in these areas after excavation. No impacted soil was identified on the west side of the building and approximately 5 to 10 cubic yards of impacted soil was estimated to remain south of the building. Two groundwater monitoring wells were installed at the property, one at each removal area, and sampled in July 1993 and June 1994. No detectable concentrations of TPHd, total petroleum hydrocarbons as gasoline (TPHg), or BTEX were detected in the sampled groundwater during the sampling events.

Polychlorinated Biphenyls (PCBs)

Neither of the Phase I ESAs identified any electrical transformers or other equipment that could potentially contain PCBs on site. However, due to the age of the building, it is possible that some transformers or electrical equipment may remain on site that could potentially contain PCBs.

Nearby Facilities of Concern

The Phase I ESAs identified several facilities in the surrounding area that have records in various environmental compliance tracking databases, including industrial facilities and drycleaning establishments. These facilities generated various types of hazardous waste and used oil. The majority of these sites are not recorded as having had a release. However, one of the drycleaning facilities was cited by regulators for improper storage of hazardous materials. Although there are no records of reported releases at any of the drycleaning facilities, the Phase I ESAs identified the presence of these facilities adjacent to the site to be a potential concern.

3.11.2 Environmental Consequences

To evaluate the impacts to hazardous materials and wastes, alternatives were reviewed for their potential to cause the following:

- New sources of construction materials and operational supplies to be developed;
- Affect the capacity of existing material suppliers and industries in the region;
- Create the need for a hazardous waste treatment, storage, or disposal permit for the project;
- Create reasonably foreseeable conditions that would increase the risk of a hazardous materials or hazardous waste release; or
- Affect the capacity of waste collection services and treatment, storage, and disposal facilities.

A significant adverse impact to hazardous materials and wastes would occur if the action would result in:

- Violations of applicable federal, state, or local standards related to the management of hazardous materials or wastes, or
- Increase in the use of hazardous materials or generation of hazardous wastes to such an extent that would lead to an elevated risk of human health or environmental effects.

When assessing significance, GSA also took into account the potential for BMPs to reduce the severity or extent of these impacts. Applicable BMPs are described in Section 3.11.2.4.

3.11.2.1 No Action Alternative

Under the No Action Alternative, GSA would not construct a new USCIS building or relocate tenants to new offsite locations. Maintenance and repairs to the CHFB would continue to occur as needed, which could generate minor amounts of hazardous waste and other regulated wastes such as asbestos-containing materials³. All wastes, including hazardous wastes and other wastes requiring special handling and disposal, would be managed in accordance with all applicable federal and state regulations. No additional impacts related to hazardous materials or wastes would occur, beyond those occurring under current conditions.

3.11.2.2 Alternative 1

Construction

Alternative 1 would have negligible to minor direct impacts on hazardous materials and wastes during construction of a new USCIS building. Impacts would be short-term and adverse, and would end once construction activities are completed.

To minimize potential exposure or safety concerns to workers, any existing municipal (household) trash, construction debris, and other waste materials would be removed from all proposed development areas on the 27.15-acre parcel and disposed of in accordance with applicable regulations. In addition, potentially hazardous wastes generated during project-related construction activities would be disposed of or recycled at appropriate facilities in accordance with associated regulatory requirements. There may be areas within the 27.15-acre parcel to be retained with potential lead-containing surfaces that would need to be managed appropriately (e.g., paint used to mark the parking lots and roads). These materials would be sampled and if lead is found to be present, appropriate precautions would be taken during demolition and waste removal to ensure worker protection and compliance with applicable regulations.

Hazardous materials associated with construction would be used in accordance with federal, state and local regulations. The increased amounts of hazardous materials such as diesel fuel, gasoline, paint, adhesives and solvents used onsite during construction could increase the potential for spills. Any spills from construction activities would be immediately contained and disposed of properly. In addition, any project-specific hazards affecting workers would be reduced based on strict adherence to OSHA standards and other relevant safety laws, rules and regulations. Therefore, there would be a low likelihood of hazardous material spills or associated human health impacts as a result of construction activities. See Section 3.11.2.4 on steps that would be taken to minimize impacts related to hazardous materials and wastes during construction activities.

Potentially contaminated soil (as a result of historical spills and releases or pesticide use) could be encountered during excavation or demolition activities. Soil sampling would be conducted prior to soil reuse or disposal to characterize the soil for the presence of hazardous materials (e.g., metals, petroleum hydrocarbons, VOCs, pesticides, etc.). If contaminated soil is present, appropriate abatement, management or disposal actions would be implemented in accordance with applicable regulatory requirements to prevent, minimize, and control hazardous materials, if necessary, during construction.

Operations

There would be negligible impacts related to hazardous materials and wastes from operations of the new USCIS building. The new facility would not include any ACMs or lead-based paint that could result in occupant exposure, or any PCB-containing electrical equipment. There may be petroleum storage tanks

³ Note that per State of California regulations, any asbestos containing waste that is friable and contains more than 1 percent of asbestos would need to be managed as “California-only” hazardous waste.

associated with the new facility; these would be installed and operated in accordance with all applicable regulations and current industry standards including leak-detection systems and secondary containment. Hazardous materials such as paints and cleaners would be used in facility maintenance activities, but these would likely be in small amounts. Small amounts of hazardous waste may also be generated periodically from facility maintenance activities and would be managed in accordance with applicable regulations.

Future Redevelopment

Under a renovation scenario, minor indirect impacts could occur from renovation of the existing CHFB on the remaining 64.85-acre parcel to be disposed of due to the use of hazardous materials and generation of hazardous waste during construction. All locations potentially containing LBP would likely be evaluated before starting construction activities to determine if any abatement measures would be required. For all ACMs, a licensed abatement contractor would likely be retained to remove and properly dispose of ACMs prior to commencing construction operations. Additionally, any transformers that need to be disturbed or moved would likely be sampled for PCB content. If PCBs are present, appropriate abatement actions for their disposal would likely be implemented in accordance with regulatory requirements, and soil beneath transformers would likely be evaluated for evidence of releases. If any releases are detected in underlying soils, appropriate abatement actions for removal and disposal would likely be implemented in accordance with applicable regulatory requirements. Additional types of hazardous or otherwise regulated waste materials could also be generated during renovation activities. These include, but are not limited to, items such as fluorescent, halide, or sodium vapor lamps containing mercury; smoke detectors and emergency exit signs containing low-level radioactive sources; mercury switches; electronic ballasts containing PCBs and/or other fluids; and various equipment containing batteries. The amount of waste generated, including waste ACM, lead-contaminated debris, and PCB wastes, may vary depending on the extent of renovations being undertaken. Other construction-related impacts would likely be similar to the direct impacts discussed for construction of the new USCIS building, including the potential for encountering contaminated soil, the use of hazardous materials and generation of wastes during construction, and the potential for hazardous materials spills. Any future development may be subject to compliance with South Coast Air Quality Management District Rule 1403, which specifies work practices that limit asbestos emissions from building demolition and renovation activities. Similarly, CalOSHA Rule 1532.1 and the California Department of Public Health's lead-related construction program require work practices to minimize the generation of, and worker exposure to, lead-containing dust.

Under operations of a renovation scenario, similar amounts of hazardous material usage and waste generation may occur as under existing conditions for the CHFB. To the extent that existing hazardous materials such as ACM, LBP, and PCBs are removed during renovation activities, there could be a minor but long-term beneficial impact from operations.

Under a demolition/new construction scenario, indirect impacts related to construction would likely be similar to the renovation scenario but could be greater in magnitude because of demolition of the existing CHFB. Additionally, there may be an increased potential for spills and other wastes to be generated during construction activities. Demolition and construction debris would likely be managed in accordance with applicable regulations and disposed of at appropriately licensed facilities. Impacts from generation of wastes during demolition and construction activities would likely be minor, adverse and short-term. There could be a long-term beneficial impact during operations, as a result of the removal of existing hazardous materials from the site.

Follow-on NEPA or CEQA analyses may be required (depending on who acquires the site) for any proposed redevelopment plans presented by a future developer, to include further consideration of impacts related to hazardous materials and waste, once final development plans are completed.

3.11.2.3 Preferred Alternative (Alternative 2)

Under the Preferred Alternative, there would be negligible to minor direct impacts to hazardous materials or wastes. All tenants would be removed from the CHFEB and no construction would occur at the site. Off-site leasing of new office space may require office buildouts, which could result in negligible to minor, temporary increases in waste generation. There may also be a temporary minor increase in waste generation due to disposal of items while the CHFEB is being vacated, including the potential for small quantities of hazardous waste. These activities would be required to comply with all applicable federal, state and local regulations.

Future Redevelopment

Under a renovation/new construction scenario, minor indirect impacts could occur from renovation of the existing CHFEB and new construction on the south or west end of the 92-acre site to be disposed. Under this scenario for the Preferred Alternative, there could be minor indirect impacts from use of hazardous materials and generation of hazardous wastes during renovation activities, similar to as described for Alternative 1 Future Redevelopment (renovation scenario). In addition, it is assumed there may be some new construction on the south or west end of the site, resulting in similar, minor impacts as described for construction of the new USCIS building under Alternative 1.

Under a demolition/new construction scenario, indirect impacts could occur from demolition of the existing CHFEB and new construction on the 92-acre site to be disposed. Under this scenario for the Preferred Alternative, there could be moderate indirect impacts from use of hazardous materials and generation of hazardous wastes during construction. Impacts would likely be similar to the impacts described under Alternative 1 Future Redevelopment (demolition/new construction scenario) but would likely be to a greater intensity, as up to 92 acres of the site could potentially be impacted.

Operations under a renovation/new construction or a demolition/new construction could result in similar impacts as described under operations for Alternative 1, Future Redevelopment. To the extent that existing hazardous materials such as ACM, LBP, and PCBs are removed during renovation activities, there could be a minor, long-term beneficial impact on occupant health. Any existing hazardous materials in the CHFEB would likely be completely removed under a demolition/new construction scenario. Usage of hazardous material and generation of waste may continue to occur as a result of building operations and maintenance under both scenarios.

Similar to Alternative 1, follow-on NEPA or CEQA analyses may further address impacts to hazardous materials and wastes once final development plans are completed.

3.11.2.4 Impact Reduction Measures

Measures that would limit impacts related to hazardous materials and wastes during building construction and operations are discussed below.

- If PCB-containing materials are identified onsite, appropriate abatement actions for their disposal would be implemented in accordance with regulatory requirements, and soil beneath transformers would be evaluated for evidence of releases. If present in underlying soils, appropriate abatement actions for removal and disposal would be implemented in accordance with applicable regulatory requirements.
- All spills or releases of petroleum oil lubricating products, hazardous materials, pollutants or contaminants would be handled in accordance with measures outlined in a Spill Prevention and Response Plan prepared for the construction project.
- As a best management practice, a Soil Management Plan would be prepared to address the potential for encountering areas of environmental concern (e.g., contaminated soil) during grading, excavation or other subsurface disturbance. The Soil Management Plan would identify specific

measures to address hazardous waste and materials cleanup efforts including monitoring, handling, stockpiling, characterization, on-site reuse, export and disposal protocols for excavated soil.

- To prevent exposure to workers or the release of hazardous waste and materials to the environment, field surveys, soil sampling or laboratory testing would be conducted in any questionable areas prior to renovations, construction or demolition. These efforts would evaluate the potential occurrence of contaminants where known spills or contamination have occurred, followed by proper handling and disposal as necessary.
- All potentially hazardous wastes generated would be properly characterized, segregated, and managed onsite prior to offsite disposal.

Similar measures would likely be required and implemented for any future development on the site as part of Alternatives 1 and 2, regardless of ownership. Any waste materials that contain, or are suspected to contain, asbestos or lead generated during future development activities would likely be characterized and managed as appropriate, including the use of containment and dust reduction measures as needed during deconstruction activities, and waste would likely be handled and disposed of in accordance with all applicable regulations. All other potentially hazardous wastes would likely be properly characterized, segregated, and managed onsite prior to offsite disposal.

3.12 NOISE

This section presents an overview of noise, how noise is measured, and the existing acoustic environment that could be affected by the alternatives.

3.12.1 Affected Environment

The ROI for noise includes the CHFB site and areas within a half-mile radius. The ROI does not include regional conditions outside of the 92-acre CHFB site and corresponding half-mile radius; it is assumed off-site leased office space would be located in existing commercial areas or office parks, and noise levels experienced would be consistent with existing conditions at these locations. Construction buildouts at off-site leased office space would occur primarily indoors and would not require any ground disturbance or major earth work; therefore, negligible impacts would occur to the surrounding noise environment at those locations. Noise levels from these activities would be subject to applicable local noise ordinances and would occur during normal construction hours.

3.12.1.1 Noise Metrics and Regulations

Sound is a physical phenomenon consisting of vibrations that travel through a medium, such as air, and are sensed by the human ear. Noise is defined as any sound that is undesirable to the receptor because it interferes with communication, is intense enough to damage hearing, or is otherwise intrusive. While sound is defined as an auditory effect, noise is considered a disturbance. Human and wildlife responses to noise vary according to the type of sound, characteristics of the sound source, distance between the source and receptor, receptor sensitivity and time of day. Noise is often generated by activities essential to a community's economy and quality of life, such as construction and vehicular traffic. An organism's response to a sound source determines whether the sound is judged as pleasing or annoying. Noise can also be detrimental if it disturbs an organism's normal behavior (USEPA 1981).

Sound varies by both intensity and frequency. Sound pressure level, described in decibels (dB), is used to quantify sound intensity. The dB is a logarithmic unit that expresses the ratio of a sound pressure level to a standard reference level. Hertz (Hz) are used to quantify sound frequency. The A-weighted decibel (dBA) is used to characterize sound levels that can be sensed by the human ear. "A-weighted" denotes the adjustment of the frequency range to what the average human ear can sense when experiencing an audible event. The threshold of audibility is generally within the range of 10 to 25 dBA for normal hearing. The threshold of pain occurs at the upper boundary of audibility, which is normally in the region of 135 dBA (USEPA 1981). Table 3.12-1 presents sounds encountered in daily life, their dBA levels, and how they affect hearing. For example, a whisper is usually 30 dBA and is considered to be very quiet, an air conditioning unit 20 feet away is considered an intrusive noise at 60 dBA, and the sound of a refrigerator at 55 dBA is considered at the level of ambient sound levels. Noise levels can become annoying at 80 dBA and very annoying at 90 dBA. To the human ear, each 10 dBA increase seems twice as loud (USEPA 1981).

The dBA noise metric describes steady noise levels, although very few noises are in fact constant. Therefore, Day-night Sound Level (DNL) has been developed. DNL is defined as the average sound energy in a 24-hour period with a 10-dB penalty added to the nighttime levels (10 p.m. to 7 a.m.). It is a useful descriptor for noise because: 1) it averages ongoing yet intermittent noise; and 2) it measures total sound energy over a 24-hour period. In addition, Equivalent Sound Level (L_{eq}) is often used to describe the overall noise environment. L_{eq} is the average sound level in dB.

Ambient, or background, noise is a combination of various sources heard simultaneously. Calculating noise levels for combinations of sounds does not involve simple addition, but instead uses a logarithmic scale (HUD 1985). As a result, the addition of two noises, such as a garbage truck (100 dBA) and a lawn mower (95 dBA) would result in a cumulative sound level of 101.2 dBA, not 195 dBA.

Table 3.12-1. Sound Levels and Human Response

Sound Level (dBA)	Effect	Outdoor	Indoor
30	Very quiet	Rustling leaves	Soft whisper (15 feet)
40	Quiet	Quiet residential area	Library
55	Ambient	Rainfall or light auto traffic (100 feet)	Refrigerator
60	Intrusive	Normal Conversation	Air conditioning unit (20 feet)
70	Telephone use difficult	Freeway traffic	Noisy restaurant or TV audio
80	Annoying	Downtown (large city)	Alarm clock (2 feet) or ringing telephone
90	Very annoying; hearing damage (8 hours)	Tractor, bulldozer, excavator	Garbage disposal
100	Very annoying	Garbage truck, motorcycle	Subway train
110	Strained vocal effort	Pile drivers	Power saw at 3 feet
120	Maximum vocal effort	Jet takeoff (200 feet) or auto horn (3 feet)	Rock concert
140	Painfully loud	Carrier deck jet operation	--

Source: USEPA 1981

dba = A-weighted decibel

Noise levels decrease (attenuate) with distance from the source. The decrease in sound level from any single noise source normally follows the “inverse square law.” That is, the sound level change is inversely proportional to the square of the distance from the sound source. A generally accepted rule is that the sound level from a stationary source would drop approximately 6 dB each time the distance from the sound source is doubled. The sound level from a moving “line” source (e.g., a train or vehicle) would drop 3 dB each time the distance from the source is doubled (USDOT 2018).

Barriers, both manmade (e.g., sound walls) and natural (e.g., forested areas, hills, etc.), as well as other natural factors such as temperature and climate, may reduce noise levels. Standard buildings typically provide approximately 15 dB of noise reduction between exterior and interior noise levels (USEPA 1978). Noise generated by stationary and mobile sources has the potential to impact sensitive noise receptors, such as residences, hospitals, and schools. Persistent and escalating sources of sound are often considered annoyances and can interfere with normal activities, such as sleeping or conversation, such that these sounds could disrupt or diminish quality of life.

The OSHA’s noise standard (29 CFR 1910.95) established workplace standards for noise. The minimum requirement states that constant noise exposure must not exceed 90 dBA over an 8-hour period. The highest allowable sound level to which workers can be constantly exposed is 115 dBA; exposure to this level must not exceed 15 minutes within an 8-hour period. The standards limit instantaneous exposure, such as impact noise, to 140 dBA. If noise levels exceed these standards, employers are required to provide hearing protection equipment that reduces sound levels to acceptable limits (OSHA 2019).

The Noise Control Act of 1972 (PL 92-574) directs federal agencies to comply with applicable federal, state, interstate, and local noise control regulations. In 1974, the USEPA provided information suggesting that continuous and long-term noise levels in excess of DNL 65 dBA are normally unacceptable for noise-sensitive land uses such as residences, schools, churches, and hospitals. However, in 1982, the USEPA transferred the primary responsibility of regulating noise to state and local governments.

Division 6 of the City of Laguna Niguel’s Municipal Code, Noise Control, regulates the control of unnecessary, excessive and annoying sounds emanating from the City. The Noise Element of the City of Laguna Niguel General Plan provides the allowable noise levels by land use (City of Laguna Niguel 1992b). Community Noise Equivalent Level (CNEL) is the predominant noise rating scale used in California for land use compatibility. The CNEL rating represents the average of equivalent noise levels at a location for a 24-hour period, based on an A-weighted decibel with upward adjustments added to account for increased noise sensitivity in the evening and night periods in order to account for the lower tolerance of individuals to noise during those periods.

3.12.1.2 Existing Noise

The CHFEB site is located within an existing commercial area in Laguna Niguel. Primary sources of noise near the site include motor vehicle traffic from nearby roadways, commercial activity from nearby shopping centers, and minor overhead aircraft noise.

Land use noise compatibility guidelines for office buildings areas are considered compatible from 50 to 68 CNEL, conditionally compatible from 68 to 77 CNEL and incompatible above 77 CNEL (City of Laguna Niguel 1992b).

Table 3.12-2 lists the nearby sensitive receptors within 0.5 mile of the proposed construction site at the CHFEB. Sensitive receptors include residences, schools, daycares, libraries, parks, churches, and senior living communities.

Table 3.12-2. Nearby Sensitive Receptors

Receptor Type	Receptor	Direction from CHFEB	Distance (feet)
Park	El Lazo Basketball Courts	onsite at CHFEB	0
Park	Laguna Niguel Skate and Soccer Park	Northwest	106
Daycare	Ziggurat Child Development Center	onsite at CHFEB	264
Church	Faith Episcopal Church	East	317
Library	Music House Library	South	475
Park	Hillview Park	West	792
School	Aliso Niguel High School	West	792
Park	La Paz Sports Park	South	1,056
Residence	Residential Areas	East/West	1,056
Church	Vineyard Laguna Niguel (church)	Northeast	1,320
Park	Niguel Heights Park	East	1,320
Park	Laguna Niguel Regional Park	South	1,320
School	Laguna Niguel Elementary School	East	1,320
School	Wood Canyon Elementary School	Southwest	1,320
Church	The Church of Jesus Christ Latter Day Saints	Southwest	1,901
Park	Aliso Canyon Community Park	Southwest	1,954
Residence	Residential Areas	South	2,059
Daycare	Tutor Time of Laguna	Northeast	2,218
Senior Center	OC Senior Care	East	2,270
School	St. Mary's School	Southwest	2,482
Park	Aliso and Wood Canyons Wilderness Park	Southwest	2,534

Source: City of Laguna Niguel 2019, 2011
CHFEB = Chet Holifield Federal Building

3.12.2 Environmental Consequences

To evaluate the potential impacts from noise and vibration, alternatives were reviewed for their potential to cause the following:

- Addition of new mobile and stationary noise sources;
- Conflict with any federal, state or local noise ordinances;
- Long-term perceptible increase in ambient noise levels above regulatory thresholds at sensitive receptors during operations; or
- Excessive ground-borne vibration to persons or property.

A significant adverse impact from noise and vibration would occur if the action would result in:

- Harm or injure to adjacent communities or sensitive receptors (i.e., residences, schools, hospitals, etc.).
- Exceed applicable environmental noise limit guidelines.

3.12.2.1 No Action Alternative

Under the No Action Alternative, GSA would not construct a new USCIS building or relocate tenants to new offsite locations. Ongoing maintenance to the CHFB would occur, which could generate minor, short-term amount of noise depending on the activity.

3.12.2.2 Alternative 1

Construction

Alternative 1 would result in moderate, short-term adverse noise impacts during construction. Construction of a new USCIS building would take approximately 30 months and involve site preparation, excavation for foundations and utility tie-ins, hauling of debris and materials, and building construction. The specific types of construction equipment and methods are not yet known, although are anticipated to be typical of standard building construction activities. Table 3.12-3 presents typical construction equipment (mobile and stationary) and the corresponding noise levels. Table 3.12-4 presents the typical noise levels during construction.

Equipment	Typical Noise Level at 50 feet (dBA)	Typical Noise Level at 500 feet (dBA)	Typical Noise Level at 1,000 feet (dBA)	Typical Noise Level at 1,500 feet (dBA)
Front Loader	80	60	54	50
Backhoe, excavator	80	60	54	50
Roller	85	65	59	55
Grader	85	65	59	55
Scraper	85	65	59	55
Truck	84	64	58	54
Front Loader	80	60	54	50

Source: Lamancusa 2009; USDOT 2018
dBA = A-weighted decibel

Construction Phase	dBA L_{eq} at 50 feet from Source
Ground Clearing	84
Excavation, Grading	89
Foundations	78
Structural	85
Finishing	89

Source: USEPA 1974; Bolt et al. 1971
dBA = A-weighted decibels; L_{eq} = Equivalent Sound Level

The maximum average noise levels generated during construction would typically range from 78 to 89 dBA at a distance of 50 feet (see Table 3.12-4). Depending on the phase of construction, construction equipment could be operated concurrently. As a result, the analysis conservatively estimates noise levels at nearby receptors using the combined noise levels of several pieces of construction equipment (USDOT 2012). The closest onsite sensitive receptors to the construction site would be the Ziggurat Child Development Center and El Lazo Basketball Courts. However, the Ziggurat Child Development Center is located 264 feet from the construction site, on the northwest corner of the CHFB; therefore, anticipated noise levels at this site during construction would be between 70 dBA to 83 dBA. Section 3.13, Environmental Justice and Protection of Children’s Health and Safety, provides additional discussion of potential noise impacts to the Child Development Center. Additionally, the El Lazo Basketball Courts would close during construction and would no longer be considered a sensitive receptor. The closest offsite receptor is the Laguna Niguel Skate and Soccer Park, located approximately 100 feet to the northwest. Offsite receptors located between 100 feet to 500 feet could experience the combined noise levels of 70 dBA to 83 dBA. Aliso Niguel High School is located approximately 792 feet or 0.15 mile west of the CHFB. Noise levels at this receptor could experience combined construction noise levels of up to 66 dBA. Residences located approximately 1,056 feet or 0.2 mile from the construction site could experience noise levels up to 63 dBA.

Standard buildings with windows and doors shut result in an approximately 15 dBA noise reduction (USEPA 1978). With windows and doors shut the interior noise levels at receptors from combined construction equipment within 50 feet would reduce to 75 dBA, and within 100 feet would reduce to approximately 69 dBA (USEPA 1978), as noise from a point source generally decreases 6 dBA per doubling of distance (Lamancusa 2009).

Although construction would be temporary, potential noise impacts would be minimized to the extent possible by standard noise control measures, such as project scheduling, noise barriers, and using noise controls on equipment (e.g., mufflers). Activities would be consistent with normal construction activities and would be conducted during normal business hours. If a variation from normal construction hours (i.e., between 7:00 a.m. and 8:00 p.m. Monday through Saturday, excluding holidays) is required due to unforeseen circumstances (e.g., weather) or for specific tasks, a variance permit⁴ from the City of Laguna Niguel would be obtained. All construction activities would comply with the City of Laguna Niguel’s noise ordinance.

⁴ Section 6-6-12 of the City of Laguna Niguel Municipal Code prescribes the process for obtaining a noise variance permit. Any owner or operator of a noise source who violates provisions of the noise code may apply for a variance with the Chief of Police. The application must include actions taken to comply with the provision, reasons why immediate compliance cannot be achieved, a proposed method of achieving compliance and a proposed time schedule for its accomplishment, and a fee. The application is then reviewed by the Noise Variance Board for approval or further action.

Operations

Negligible, long-term direct noise impacts would be expected during operations of a new USCIS building. Due to the nature of the activities associated with the USCIS building, no new stationary sources of continuous noise are expected. The emergency generator would produce periodic noise during maintenance or for emergency situations which is expected to be minimal. There would be a decrease in vehicle traffic due to approximately 1,000 fewer employees traveling to the site from baseline conditions, which would result in a decrease in noise from vehicle trips.

Long-term negligible noise impacts are anticipated from operations of new leased locations. Noise levels at respective leased locations would be consistent with prescribed noise levels (i.e., 70 dBA) for existing commercial or professional office land uses (City of Laguna Niguel 1992b). There could be a negligible increase in noise from vehicular traffic in surrounding communities. Vehicle trips would be distributed throughout Orange County and noise impacts would vary across communities depending on the final site selection for each agency and commuting patterns for tenants. Traffic increases are not anticipated to result in noticeable noise increases given the range of locations where each agency could relocate to as well as the numerous traffic patterns that could be utilized. For purposes of this analysis, it is assumed impacts associated with occupancy of new offsite office locations, to include operational noise from the leased space and vehicle trips to the leased space, has been considered in previous CEQA analyses when the respective office buildings were originally reviewed and approved by local City staff. Relocation of individuals to other leased office space throughout the region as part of Alternative 1 would not generate additional or greater noise impacts at the leased site locations beyond those disclosed during CEQA approvals, and overall impacts would be less than significant.

There would be no further direct impacts to noise from disposal of the remaining 64.85 acres of the CHF B site. The CHF B would be vacated and operations would cease at the site, resulting in a decrease in noise-generating activities from the existing location.

Future Redevelopment

Under a renovation scenario, adverse indirect impacts could occur from renovation of the existing CHF B on the remaining 64.85-acre parcel to be disposed. Moderate, short-term indirect noise impacts could occur from construction activities. Under this scenario for Alternative 1, no new structures would be constructed, but there could be construction activities on the interior and exterior of the CHF B while improvements are made to bring the building up to current California Building Code. Moderate short-term impacts could also occur to sensitive receptors similar to as described for construction of the new USCIS building, particularly the nearby sensitive receptors within 1,000 feet (refer to Table 3.12-2).

Moderate, long-term indirect noise impacts could be anticipated under operations of a renovation scenario, depending on future occupancy numbers. Noise levels would likely be similar to existing conditions at the CHF B and would be typical of commercial and office space. Assuming occupancy levels remain the same as the existing CHF B, there could be an approximate net increase of up to 2,000 vehicular trips to the site, which could result in moderate noise impacts to the surrounding community.

Under a demolition/new construction scenario, indirect impacts could occur from demolition of the existing CHF B and new construction on the remaining 64.85-acre parcel to be disposed. Under this scenario, there could be short-term moderate noise impacts during construction. Impacts would likely be similar to as described for construction of the new USCIS building but could be to a greater intensity as construction could occur across a larger area and potentially longer time frame, and may also include demolition and additional site grading due to the presence of steep slopes. Table 3.12-4 presents typical noise levels from construction. Future development plans are unknown but would likely be phased over a number of years.

Minor to moderate, long-term indirect noise impacts would be anticipated under operations of a demolition/new construction scenario. No new major stationary noise sources are anticipated under a future development scenario, and noise levels would likely be typical of prescribed noise levels (i.e., 70 dBA) for

existing commercial or professional office land uses (City of Laguna Niguel 1992b). However, increased noise levels would be likely due to an increase in density of development and increased traffic commuting to the site. The density and composition of future development that could occur, to include the extent to which travel patterns and traffic volumes within the study area may change, are currently unknown; however, noise impacts from increased traffic are not anticipated to be greater than moderate.

Future traffic levels and associated noise impacts are currently unknown but may be considered in follow-on NEPA or CEQA analyses as described in Section 2.1.1.2. Similarly, these follow-on analyses may further address noise impacts from construction and operation of future redevelopments of the site.

3.12.2.3 Preferred Alternative (Alternative 2)

Under the Preferred Alternative, there would be negligible impacts to noise during construction. Construction buildouts would occur primarily indoors and would not require any ground disturbance or major earth work. Noise levels from these activities would be subject to applicable local noise ordinances and would occur during normal construction hours.

Negligible to minor, long-term direct noise impacts are anticipated from operations of new leased locations. Noise levels at respective leased locations would be consistent with prescribed noise levels (i.e., 70 dBA) for existing commercial or professional office land uses (City of Laguna Niguel 1992b). There could be a minor increase in noise from vehicular traffic in surrounding communities. Vehicle trips would be distributed throughout Orange County and noise impacts would vary across communities depending on the final site selection for each agency and commuting patterns for tenants. Traffic increases are not anticipated to result in noticeable noise increases given the range of locations where each agency could relocate to as well as the numerous traffic patterns that could be utilized. Similar to Alternative 1, it is assumed impacts associated with occupancy of new offsite office locations, to include operational noise from the leased space and vehicle trips to the leased space, has been considered in previous CEQA analyses when the respective office buildings were originally reviewed and approved by local City staff. Relocation of individuals to other leased office space throughout the region as part of the Preferred Alternative would not generate additional or greater noise impacts at the leased site locations beyond those disclosed during CEQA approvals, and overall impacts would be less than significant.

The CHFEB would be vacated and operations would cease at the site, resulting in a long-term decrease in noise-generating activities and associated traffic (i.e., approximately 3,000 vehicles) from the existing location.

Future Redevelopment

Under a renovation/new construction scenario, there could be short-term, moderate indirect noise impacts during construction. Under this scenario for the Preferred Alternative, there could be minor noise impacts from renovation activities at CHFEB similar to as described under Alternative 1 Future Redevelopment (renovation scenario). In addition, it is assumed there could be some new construction on the south or west end of the site, resulting in similar, moderate noise impacts as described for construction of the new USCIS building under Alternative 1. Moderate impacts could occur to sensitive receptors, particularly the nearby sensitive receptors within 1,000 feet (refer to Table 3.12-2).

Under a demolition/new construction scenario, there could be moderate indirect noise impacts during construction. Impacts would likely be similar to as described for the same scenario under Alternative 1 Future Redevelopment (demolition/new construction scenario) but could be to a greater intensity and potentially longer duration as up to 92 acres of the site could be impacted. Table 3.12-4 presents typical noise levels from construction. Future development plans are unknown but would likely be phased over a number of years.

Moderate, long-term indirect noise impacts would likely be anticipated under operations of both a renovation/new construction and a demolition/new construction scenario. Increased noise levels would be

likely due to an increase in density of development and increased traffic commuting to the site. No new major stationary noise sources are anticipated under future development scenario, and noise levels would likely be typical of prescribed noise levels (i.e., 70 dBA) for existing commercial or professional office land uses (City of Laguna Niguel 1992b). Similar as for Alternative 1 Future Redevelopment, the density and composition of future development that could occur, to include the extent to which travel patterns and traffic volumes within the study area may change, are currently unknown; however, any potential noise impacts from increased traffic are not anticipated to be greater than moderate.

Future traffic levels and associated noise impacts are currently unknown but may be considered in follow-on NEPA or CEQA analyses as described in Section 2.1.2.2. Similar to Alternative 1, these follow-on analyses may further address operational noise impacts from future redevelopments of the site.

3.12.2.4 Impact Reduction Measures

Noise impacts would be minimized to the extent possible through various measures, including:

- Implementation of noise control measures, such as project scheduling, noise barriers, and using noise controls on equipment (e.g., mufflers).
- Conducting construction activities during normal business hours (i.e., between 7:00 a.m. and 8:00 p.m. Monday through Saturday, excluding holidays). If a variation from normal construction hours a variance permit from the City of Laguna Niguel would be obtained.
- All construction activities would comply with the City of Laguna Niguel's noise ordinance.

Similar measures may be required and implemented for any future development on the site as part of Alternatives 1 and 2, regardless of ownership.

3.13 ENVIRONMENTAL JUSTICE AND PROTECTION OF CHILDREN'S HEALTH AND SAFETY

EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, requires that federal agencies consider as a part of their action any disproportionately high and adverse human health or environmental effects to minority and low-income populations. Agencies are required to ensure that these potential effects are identified and addressed. The USEPA defines environmental justice as “the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.” The goal of “fair treatment” is not to shift risks among populations, but to identify potential disproportionately high adverse impacts on minority and low-income communities and identify alternatives to mitigate any adverse impacts.

EO 13045, *Protection of Children from Environmental Health Risks and Safety Risks*, places a high priority on the identification and assessment of environmental health and safety risks that may disproportionately affect children. The EO requires that each agency “shall ensure that its policies, programs, activities, and standards address disproportionate risks to children.” It considers that physiological and social development of children makes them more sensitive than adults to adverse health and safety risks, and recognizes that children in minority and low-income populations are more likely to be exposed to and have increased health and safety risks from environmental contamination than the general population.

3.13.1 Affected Environment

The ROI for environmental justice and children populations focuses on the CHF B site and immediate surrounding area. Potential impacts with the greatest intensity and longest duration (e.g., noise, air quality, transportation, changes in economic activity) would occur near the CHF B. Therefore, environmental justice and children protection considerations are analyzed within a 1-mile radius of the CHF B. There would also be impacts from the relocation of new tenants throughout the County; however, specific locations for current relocation are only known generally (see Chapter 2). In this scenario, environmental justice and children populations are considered at the County level and compared to the overall State of California.

3.13.1.1 Environmental Justice

The definitions of minority, low-income, and minority or low-income populations are presented below.

- **Minority** - Individual(s) who are members of the following population groups as designated in the U.S. Census: Black or African American, American Indian and Alaska Native, Asian, Native Hawaiian and Other Pacific Islander, as well as Hispanic or Latino of any race.
- **Low-income** - The U.S. Census Bureau uses a set of money income thresholds that vary by family size and composition to determine who is in poverty (i.e., classified as ‘low-income’). If a family's total income is less than the family's threshold, then that family and every individual in it is considered in poverty. The official poverty thresholds do not vary geographically but are updated for inflation using the Consumer Price Index. The official poverty definition uses money income before taxes and does not include capital gains or noncash benefits (such as public housing, Medicaid, and food stamps) (USCB 2019).
- **Minority or low-income population** – Populations where either: (a) the total number of minority or low-income individuals of the affected area exceeds 50 percent of the overall population in the same area, or (b) the total number of minority or low-income individuals within the affected area is meaningfully greater (e.g., 120 percent greater) than the minority or low-income population percentage in an appropriate comparison unit of geographic analysis (CEQ 1997). A minority population also exists if there is more than one minority group present and the minority percentage, as calculated by aggregating all minority persons, meets one of the above-stated thresholds.

In identifying minority or low-income populations, agencies may consider as a community either a group of individuals living in geographic proximity to one another, or a geographically dispersed/transient set of individuals (such as migrant workers or Native Americans), where either type of group experiences common conditions of environmental exposure or effect.

The selection of the appropriate unit of geographic analysis may be a governing body’s jurisdiction, a neighborhood, census tract, or other similar unit that is to be chosen so as not to artificially dilute or inflate the affected minority population.

- **Meaningfully Greater** - A meaningfully greater minority or low-income population within a geographic unit affected by a federal action is determined by comparing the minority or low-income composition of the geographic unit to the minority or low-income composition of the general population. Similar to selecting the appropriate unit of geographic analysis, a comparison population should be selected so as to not artificially dilute or inflate the affected minority populations. For this analysis, the comparison population is the total population of Orange County.

The analysis of minority and low-income populations focuses on U.S. Census Bureau data for geographic units (i.e., census tracts and block groups) that represent, as closely as possible, the potentially affected areas. A census tract is a geographic area for which the U.S. Census Bureau provides consistent sample data and is comprised of smaller census block groups. Census tracts generally contain a population between 1,200 and 8,000 people. A census block group is the smallest geographic area for which the U.S. Census Bureau provides consistent sample data, and generally contains a population between 600 and 3,000 individuals. Census data for minority populations are available at the block group level; however, data for incomes below the poverty level are currently available only for census tracts and larger areas. Table 3.13-1 summarizes the percentage of minority and low-income populations within 1 mile of the CHFb site, Orange County, and the State of California for comparison purposes.

Table 3.13-1. Minority and Low-Income Population within the Region of Influence

Population Group	1 Mile ROI		Orange County		California	
	Population	Total (%)	Population	Total (%)	Population	Total (%)
Nonminority	37,074	64	1,306,398	41	14,777,594	38
Black or African American	1,186	2	49,560	2	2,161,459	6
Total Hispanic	8,782	15	1,079,172	34	15,105,860	39
American Indian or Alaska Native	306	1	6,584	0.2	137,813	0.35
Asian	7,031	12	615,659	20	5,427,928	14
Other Minority ¹	3,258	6	98,443	3	1,372,193	4
Total Minority	20,536	36	1,849,418	59	24,205,253	62
Total Population	57,637	100	3,155,816	100	38,982,847	100
Low Income	4,588	6	378459	12.1	5773408	15.1

USCB 2017e, 2017f

¹ Other Minority = Native Hawaiian or Other Pacific Islander; Some other race; or Two or more races.

The average minority population percentage of Orange County is approximately 59 percent, and a meaningfully greater minority population percentage relative to the general population of the county would exceed the 50 percent threshold defined by CEQ. Therefore, the lower threshold of 50 percent is used to identify areas with meaningfully greater minority populations within 1 mile of the CHFb. Of the 30 block

groups within the ROI, 5 block groups have individual racial group minority populations or aggregate minority populations that meet the environmental justice criteria. The total minority population residing within the 1-mile ROI is approximately 20,536, or 36 percent of the entire population. The overall composition of the ROI is predominantly nonminority. Minority populations in the ROI are predominantly Hispanic or Latino, followed by Asian. Figure 3.13-1 displays the block groups identified as meeting the criteria for environmental justice minority populations surrounding the CHFb, as well as the population density of minority populations within each block group.

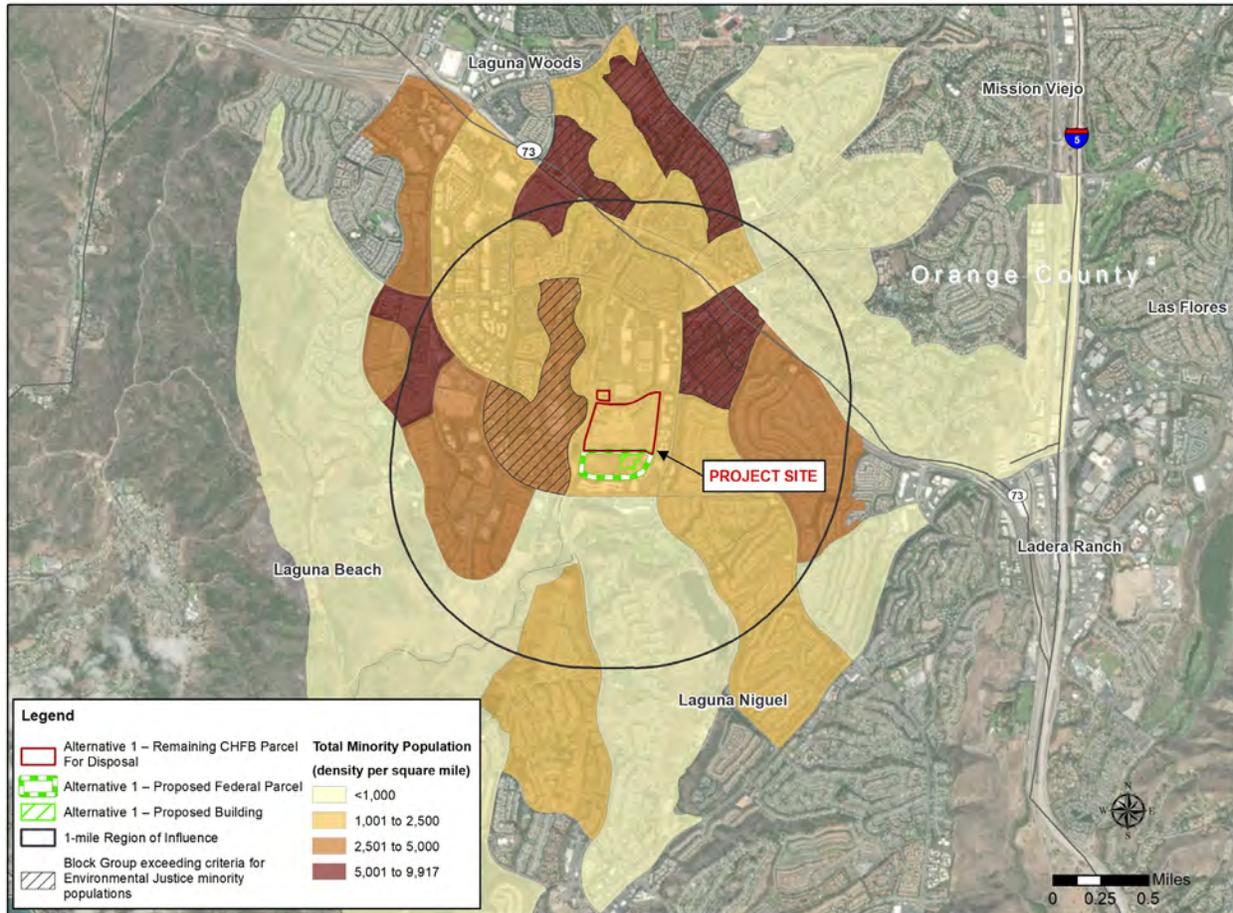


Figure 3.13-1. Minority Block Groups Near CHFb

Low-income populations were evaluated using the absolute 50 percent and the relative 120 percent or greater criteria for potentially affected census tracts within the ROI. If a census tract’s percentage of low-income individuals met the 50 percent criterion or was more than 120 percent of the total low-income population within Orange County (i.e., 14.5 percent), then the area was identified as having a low-income population. No census tracts within the 1-mile radius have a low-income population that exceeds the 50 percent or meaningfully greater criteria.

3.13.1.2 Protection of Children’s Health and Safety

The Memorandum Addressing Children’s Health through Reviews Conducted Pursuant to the National Environmental Policy Act and Section 309 of the Clean Air Act recommends that an EIS “describe the relevant demographics of affected neighborhoods, populations, and/or communities and focus exposure assessments on children who are likely to be present at schools, recreation areas, childcare centers, parks, and residential areas in close proximity to the proposed project area, and other areas of apparent frequent and/or prolonged exposure” (USEPA 2012).

The analysis for EO 13045 requires the assessment of readily available demographic data and information on local, regional, and national populations. The number and distribution of children less than 19 years old in the ROI are evaluated to determine whether they would be exposed to environmental health and safety risks from the Proposed Action and Alternatives.

Table 3.13-2 shows the population of children under age 5 and 5 to 19 within 1 mile of the CHF�, Orange County, and California. Section 3.12, Noise also shows locations of sensitive receptors, to include locations children may be present within 0.5 mile of the CHF�.

Table 3.13-2. Youth Populations in the Region of Influence

Location	Children Under 5 years (%)	Children 5 to 19 Years (%)
1 mile of CHF�	6.5	18.6
Orange County	6.0	19.4
California	6.4	19.7

Source: USCB 2017g

CHF� = Chet Holifield Federal Building

Figure 3.13-2 shows that the range of children populations under 5 years in census tracts within 1 mile of the CHF� represent 2 to 10 percent of the total populations within each tract.

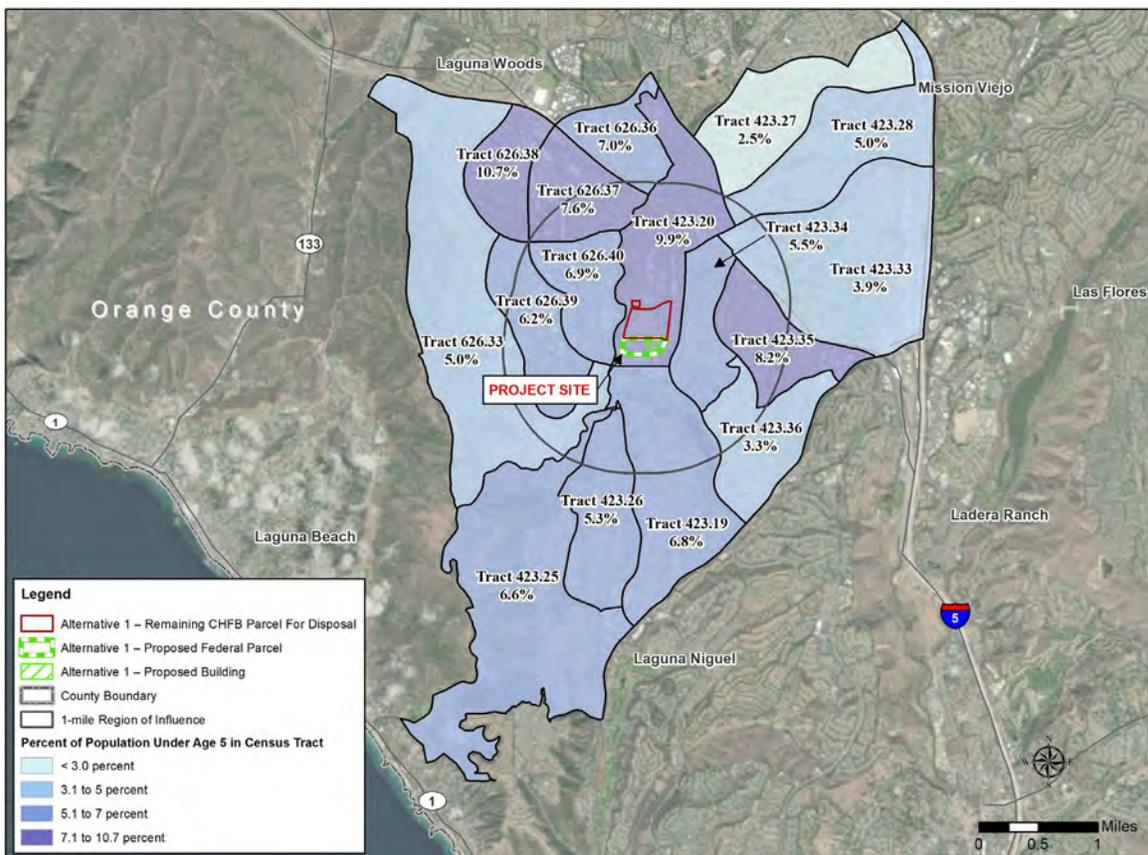


Figure 3.13-2. Percent of Population Under 5 years in Census Tracts near CHF�

3.13.2 Environmental Consequences

Consideration of the potential consequences for environmental justice requires three main components:

- 1) A demographic assessment of the affected community to identify the presence of minority or low-income and youth populations that may be potentially affected.
- 2) An assessment of all potential impacts identified to determine if any result in significant adverse impacts to the affected environment.
- 3) An integrated assessment to determine whether any disproportionately high and adverse impacts exist for minority or low-income groups and youth populations present in or near the CHFEB site.

To evaluate the impacts on environmental justice resources, alternatives were reviewed for their potential to cause the following:

- Cause a disproportionately high and adverse effect on a low-income or minority population; or
- Cause a disproportionately high and adverse environmental health and safety risks to children.

3.13.2.1 No Action Alternative

Under the No Action Alternative, GSA would not construct a new USCIS building or relocate tenants to new offsite locations. No impacts on environmental justice populations or children are anticipated.

3.13.2.2 Alternative 1

Construction

Alternative 1 would result in short-term, minor impacts on environmental justice populations. Environmental justice minority populations were identified as close as 293 feet to the west of the proposed construction site of the new USCIS building, just across Alicia Parkway (see Figure 3-13-1). The EIS identified the following impacts that could occur during construction and that may affect populations surrounding the CHFEB site, including environmental justice populations:

- Emissions, airborne dust, and soil surface disturbance from the use of on-road and nonroad construction vehicles could result in short-term and minor impacts to air quality in the immediate vicinity of the CHFEB site (see Section 3.3, Air Quality and Greenhouse Gases). Fugitive dust emissions would be managed through the use of BMPs, such as watering of soils during excavation; offsite adverse effects to adjacent populations would be minimal with the use of BMPs.
- Beneficial impacts could result from increased spending and employment in the local community (see Section 3.4, Socioeconomics).
- Minor visual impacts could occur during construction as a result of the unappealing aesthetic nature of construction activities (see Section 3.7, Visual Resources and Aesthetics).
- Minor, short-term traffic impacts could occur and cause delays near intersections closest to the CHFEB site (see Section 3.10, Traffic and Transportation).
- Receptors between 100 feet to 500 feet could experience temporary increases of combined noise levels of 70 dBA to 83 dBA (see Section 3.12, Noise). Noise impacts would be minimized to the extent possible by standard noise control measures, such as project scheduling, noise barriers, and using noise controls on equipment (e.g., mufflers). Activities would be consistent with normal construction activities and would be conducted during normal business hours.
- Brief interruptions in utility service could occur where relocation or connections would be required, although these would be temporary and coordinated with the local utility provider (see Section 3.14, Utilities and Infrastructure).

Impacts would be felt greatest directly adjacent to the construction site and would be noticeable within 1 mile. These impacts would adversely affect environmental justice minority populations within the vicinity of the CHFEB, but would not result in disproportionate or high adverse effects. Impacts would affect all

populations within the vicinity of the construction site (where the total minority population is 36 percent), and impacts would not fall disproportionately on one or more populations. Impacts would be short-term for the duration of construction (i.e., up to 30 months), and would end following construction. There are no environmental justice low-income populations identified within 1 mile of the CHFEB and no impacts on environmental justice low-income populations are anticipated.

No impacts to environmental justice populations are anticipated from future buildouts of leased space, as construction activities are anticipated to take place indoors.

Protection of Children's Health and Safety

There could be minor to moderate adverse impacts to children populations during construction. Within 1,000 feet of the CHFEB, there are four sites identified that children may regularly attend (e.g., childcare centers or schools, community centers, or recreational facilities) and that could be adversely affected from construction. These include the Ziggurat Child Development Center located onsite at CHFEB; Laguna Niguel Skate and Soccer Park (located 106 feet away); and Aliso Niguel High School and Hillview Park, both located 792 feet from the proposed construction site.

Increased level of noise created by construction equipment and vehicles could affect children's learning, especially near homes, schools, and recreational areas. At the Ziggurat Child Development Center, minor impacts are anticipated. Noise levels would be greatest when children are outdoors, which is for a short period of the day. Furthermore, the outdoor space for the daycare center is located on the other side of the CHFEB from the construction site (approximately 246 feet away), and it is anticipated existing structures would attenuate much of the construction noise emanating from site. Noise impacts could be greater at the Laguna Niguel Skate and Soccer Park, located 106 feet to the northwest. Offsite receptors located between 100 feet to 500 feet could experience the combined noise levels of 70 dBA to 83 dBA. Noise levels at Aliso Niguel High School and Hillview Park could experience combined construction noise levels of up to 66 dBA.

Minor air emissions impacts to children populations could occur during construction, particularly those closest to the construction site (i.e., at the Ziggurat Child Development Center and Laguna Niguel Skate and Soccer Park). Children are especially vulnerable due to higher relative doses of air pollution, smaller diameter airways, and more active time spent outdoors and closer to ground-level sources of vehicle exhaust. Similar to as described for environmental justice populations, emissions would be reduced through the use of BMPs such as watering of soils during excavation.

Construction areas would be fenced and under security due to the Homeland Security mission of Alternative 1, so that the likelihood of children entering the construction site and encountering safety risks is low.

Operations

Minor to moderate impacts on environmental justice populations are anticipated during operations under Alternative 1. No or negligible adverse impacts from air, traffic, noise, or visual resources are anticipated during operations of the new USCIS building. There could be locally moderate to significant adverse socioeconomic impacts within Laguna Niguel from a decrease in employment by up to 3 percent due to tenant relocation to other areas within Orange County. This could adversely affect the local economy in Laguna Niguel, particularly lower wage employees working in service industry jobs. Although this could adversely affect low-income individuals in the area, unemployment is generally low in Laguna Niguel and Orange County, median incomes are much higher in the City and County compared to the State and United States (see Section 3.4, Socioeconomics), and no low-income environmental justice populations were identified within 1-mile of the CHFEB. Similarly, the socioeconomic benefits of increased employment would shift to newly leased locations throughout the County, resulting in economic benefits and indirect and induced job creation near those communities. Therefore, impacts would not be disproportionately high or adverse to these communities, and impacts on environmental justice populations would be less than significant.

Protection of Children's Health and Safety

No impacts to children populations are anticipated during operations of Alternative 1.

Future Redevelopment

Negligible to minor indirect impacts to environmental justice populations are anticipated during construction under a renovation scenario for Alternative 1. Construction disturbances from air emissions, visual resources impacts, traffic, and noise would likely be negligible to moderate as described in Sections 3.3, Air Quality and Greenhouse Gases; Section 3.7, Visual Resources and Aesthetics; Section 3.10, Traffic and Transportation; and Section 3.12, Noise, but are not anticipated to result in disproportionately high or adverse impacts to environmental justice populations, for the same reasons as described for construction of the USCIS building. Under future redevelopment for Alternative 1, it is anticipated the Ziggurat Child Daycare facility would be relocated to the new USCIS building. Depending on renovation activities, child populations could be adversely affected (as well as at the Laguna Niguel Skate and Soccer Park, Aliso Niguel High School, and Hillview Park) similar to as described for construction of the new USCIS building.

Moderate indirect impacts on environmental justice populations could occur during operations of a renovation scenario. A net increase of up to 2,000 employees at the existing CHFB site from new development could adversely affect housing, community services, and recreational facilities in Laguna Niguel, and could result in substantial increases in vehicle trips to the site. As shown in Figure 3.13-1, environmental justice populations are located directly west of the CHFB site and could experience long-term adverse socioeconomic, traffic, and associated air emissions impacts. However, these impacts would not likely result in disproportionate or high adverse effects, as impacts would likely be felt by all populations within the immediate vicinity of CHFB (where the total minority population is 36 percent of the population within 1 mile) and not fall disproportionately on one or more populations. Similarly, increased development could have long-term beneficial economic impacts on the Laguna Niguel community, which could also benefit environmental justice populations. There are no environmental justice low-income populations identified within 1 mile of the existing CHFB site and no impacts on environmental justice low-income populations are anticipated. No impacts to children populations are anticipated during operations of a renovation scenario.

Under a demolition/new construction scenario, minor to moderate indirect impacts to environmental justice populations and children populations could occur during construction. Impacts would likely be similar to as described for construction of the new USCIS building but could be to a greater intensity as development could occur over a larger area and to a greater extent. The extent of noise, traffic, and air emissions impacts may be greater due to the greater intensity and scale of development as well as the timeline for construction; however, implementation of BMPs during construction activities would be anticipated to keep potential adverse effects to less than significant.

Impacts during operations of a demolition/new construction scenario would likely be similar to as described for operations of the renovation scenario, but to a larger extent and intensity. Future development of the site is currently unknown and would be dictated by the future owner of the site. As a result, the extent of socioeconomic and traffic impacts is unknown. Depending on the size and scale of development, these impacts could be potentially significant, which could adversely affect minority populations. However, similar for operation of the USCIS building, these impacts would likely be experienced by all populations within the 1-mile radius, and would not likely be disproportionately high or adverse upon environmental justice populations. Therefore, impacts to environmental justice populations are not anticipated to be significant.

Follow-on NEPA or CEQA analyses may be required (depending on who acquires the site) for any proposed redevelopment plans presented by a future developer, to include further consideration of impacts on environmental justice populations, once final development plans are completed.

3.13.2.3 Preferred Alternative (Alternative 2)

Under the Preferred Alternative, there would be no adverse impacts to environmental justice or children populations during construction as there would be no or negligible impacts to air emissions, visual resources, traffic, and noise during construction; and there would be beneficial socioeconomic impacts as described in Sections 3.3, Air Quality and Greenhouse Gases; Section 3.4, Socioeconomics, Section 3.7, Visual Resources and Aesthetics; Section 3.10, Traffic and Transportation; and Section 3.12, Noise. Impacts would be greatest near the final location of USCIS, which is likely to occur in the northern part of Orange County (e.g., Irvine, Santa Ana or Anaheim). Locally moderate impacts on environmental justice populations are anticipated during operations under the Preferred Alternative from a decrease in employment by up to 9 percent due to tenant relocation to other areas within Orange County, similar to as described for Alternative 1. No impacts to children populations are anticipated during construction or operations of the Preferred Alternative.

Future Redevelopment

Under both a renovation/new construction and demolition/new construction scenario, minor to moderate indirect impacts could occur to environmental justice populations, from air emissions, visual resources, traffic, noise, and socioeconomic impacts. Impacts during construction and operation would likely be similar to as described under Alternative 1 Future Redevelopment for the demolition/new construction scenario, and would likely be dependent on the size and scope of new development to occur on the parcel. Impacts could be to a greater extent and intensity under a demolition/new construction scenario, depending on the scale of new development. Similar to as described under Alternative 1, these impacts are not anticipated to be disproportionately high or adverse, given the composition of the ROI and nature of the impacts. Impacts to children populations would likely be similar during construction and operations as described under Alternative 1 Future Redevelopment.

Similar to Alternative 1, follow-on NEPA or CEQA analyses may be required (depending on who acquires the site) for any proposed redevelopment plans presented by a future developer, to include further consideration of impacts on environmental justice populations.

3.13.2.4 Impact Reduction Measures

Impact reduction measures for resources specific to environmental justice are discussed in the respective sections (i.e. Sections 3.3, Air Quality and Greenhouse Gases; Section 3.7, Visual Resources and Aesthetics; Section 3.10, Traffic and Transportation; and Section 3.12, Noise).

3.14 UTILITIES AND INFRASTRUCTURE

This section assesses the potential for existing utilities and support infrastructure within the vicinity of the CHF� site to affect, or be affected by, implementation of the project.

3.14.1 Affected Environment

For purposes of this analysis, it was assumed that the ROI includes utilities utilized by the CHF� and any other utilities located on or adjacent to the 92-acre CHF� site. Existing utilities and support infrastructure located in the ROI, primarily within local roadways and the existing CHF� site, include water and sewer, natural gas, electricity, communications and stormwater, and are discussed below.

3.14.1.1 Water and Sewer

The Moulton Niguel Water District (MNWD) provides water and wastewater services to the CHF� and the greater Laguna Niguel area, serving over 170,000 customers (Municipal Water District of Orange County 2019). The MNWD service area is almost entirely developed and encompasses all or portions of the cities of Aliso Viejo, Laguna Niguel, Laguna Hills, Mission Viejo, Dana Point, and San Juan Capistrano. The primary wholesale water supplier to MNWD is the Metropolitan Water District of Southern California, which provides approximately 75 percent of MNWD's total water supply. The remaining water supply is recycled water that serves landscape irrigation services.

South Orange County is highly dependent on imported water (Orange County Water District 2018). Orange County depends on imported water from northern California through the State Water Project and the Colorado River for approximately 37 percent of the County's total water supply. The balance comes from a large groundwater basin underlying the northern half of the County, recycled wastewater produced by local water agencies, and several smaller groundwater basins.

Wastewater generated at the CHF� is conveyed by a clay tile conveyance system to the MNWD sanitary sewer system at El Lazo Road and is treated at MNWD's 3A Wastewater Treatment Plant. The 3A Wastewater Treatment Plant is a conventional activated sludge treatment facility; the treatment process at the facility includes screening, grit removal, primary clarification, secondary treatment (activated sludge), secondary clarification, anaerobic digestion and solids dewatering. The design capacity of the 3A Treatment Plant is 6 million gallons per day. Approximately 2.4 million gallons of the plant's wastewater receives additional treatment each day for use as recycled water to irrigate local parks and greenbelts. Effluent that is not recycled is discharged to the Pacific Ocean through the San Juan Creek Ocean Outfall (Orange County Water District 2018).

Wastewater piping within the building consists of cast iron piping and is reported to be in good condition per recent assessments. The use of clay tile piping for external wastewater transport has resulted in ongoing exterior maintenance issues, as this type of piping can be compromised with tree roots. Additionally, long runs from the building to the street sewer amplify this issue.

Current annual water consumption at the CHF� is estimated at 12.5 million gallons. Water is used at the CHF� in bathroom sinks, showers, toilets, and in kitchen sinks and dishwashers; all of these activities also generate wastewater. Current annual wastewater is estimated at 10.2 million gallons.

3.14.1.2 Natural Gas and Electrical

Natural gas is supplied to the CHF� site by Southern California Gas (SoCalGas), a regulated public utility that is owned by Sempra Energy. Natural gas is used at the CHF� for heating and hot water [GSA to confirm whether gas is supplied, and if so, to the CHF� or Central Utility Plant, or both]. The Southern California Edison Company supplies electricity to the main CHF� and the CUP. Electricity is used at the CHF� to power heating, ventilation, and air conditioning (HVAC), lighting, and office electronics equipment. Current yearly natural gas consumption at the CHF� is estimated at 24.7 million cubic feet (cf) and electricity consumption is 17.3 million kilowatt hours (kwh).

A 350 kW/438kVA Kohler standby diesel generator located on the CHFEB basement level provides backup power to elevators, stair pressurization fans, the fire alarm system, and the fire pump jockey pump. A separate, newer generator provides emergency power exclusively to ICE, a tenant of the CHFEB.

The CHFEB also has a photovoltaic (PV) solar array with a total generating capacity of 914 kW. The array consists of over 3,840 panels located in the roof areas. The PV inverters and associated equipment are located in the building's basement. The Chet Holifield PV array is the second largest PV array in Orange County.

3.14.1.3 Communications

Telephone and cable are provided by private utilities (AT&T and COX Communication). Telephone and cable lines to the CHFEB enter the building from the east and south side of building in underground ducting from a man hole in parking lot.

3.14.1.4 Stormwater Infrastructure

The CHFEB site is located within the Aliso Creek watershed. Aliso Creek is located adjacent to the site, across Alicia Parkway, and drains into the Pacific Ocean. During a Phase I ESA performed for this project, the site reconnaissance team observed storm drains located around the periphery of the site (GSA 2019d). Stormwater from the site is collected via a storm sewer that runs from east to west across the southern portion of the site and drains into Aliso Creek after crossing under Alicia Parkway. Based on an aerial review of the site, it is estimated that the 92-acre site consists of approximately 59 acres of developed or paved areas, (i.e., buildings, roads, or parking areas), approximately 18 acres of landscaped areas, and approximately 15 acres of undeveloped gravel lots on the outermost southern and western portions of the site.

3.14.2 Environmental Consequences

To evaluate the impacts on utilities and infrastructure, alternatives were reviewed for their potential to cause the following:

- Disrupt utility operations during construction activities, or
- Lead to an increase in demand for utility services during construction or operations, such that the utility's capacity to meet that demand would be exceeded or the level of service provided to other customers would be negatively affected.

A significant adverse impact to utilities and infrastructure would occur if the action would result in:

- Long-term disruption of utility operations;
- Negatively affect local and regional utility supplier's ability to meet customer demands; or
- Require public utility system updates.

3.14.2.1 No Action Alternative

Under the No Action Alternative, GSA would not construct a new USCIS building or relocate tenants to new offsite locations. Operations and maintenance of the CHFEB would continue, and the resulting demand for utility services would be similar to existing conditions. Utilities would require ongoing maintenance as the systems increase in age. No additional impacts related to utilities or infrastructure would occur, beyond those occurring under current conditions.

3.14.2.2 Alternative 1

Construction

Under Alternative 1, there may be a short-term increase in demand for water and wastewater because of construction-related activities. Water would be required to control fugitive dust generation; and it is assumed water would either be trucked in or supplied by onsite sources. Any increases in water usage would be temporary and negligible and not impact the ability of utility providers to meet customer demand. There would be a temporary and negligible increase in demand for wastewater services during construction from hauling of portable toilets and other wastewater generated offsite. It is assumed any electricity needs (e.g., for construction trailers) would be provided by onsite portable generators and would not result in any increased demand on electrical providers. There would not be any increase in demand for telecommunication services during construction. As discussed in Section 3.8.2.2, new development would be required to comply with City of Laguna Nigel stormwater requirements, which requires all development or redevelopment projects, where applicable and feasible, to maximize infiltration, provide retention, slow runoff, and reduce pollutants at the source.

Construction during Alternative 1 (including activities such as excavation, drilling, and other above- and below-ground work) would have the potential to cause temporary impacts to utility lines within the project area. Existing utility maps would be reviewed and, where needed, utility companies would be contacted to identify any locations where construction activities have the potential to affect utility lines. Impacts would be avoided by coordinating with responsible utility providers in advance of such activities and by either implementing measures to protect existing utility lines, or by arranging for their temporary or permanent relocation.

New utility connections would likely be required to provide services to the new facility associated with Alternative 1. Precise locations of proposed utilities for the new building are dependent on final design and would be installed in coordination with each utility company to ensure appropriate design and capacity for the utility connection to the proposed facilities. Any new utility connections would be established only after securing the appropriate approvals from utility providers.

Operations

There would be long-term, negligible beneficial impacts to water and electricity utilities under operations for Alternative 1. Since the new USCIS building under Alternative 1 would have a substantially smaller footprint (380,00 square feet) compared to the existing CHFB (1 million square feet), and would house 1,000 fewer workers than the existing CHFB, a long-term decrease in demand for potable water, electric services, and wastewater management would be expected in the vicinity of the CHFB. Additional reductions in utility demand would occur as a result of improved building efficiency, as the new USCIS would be designed to comply with current building codes as well as P100 Standards. Further reductions may occur through energy and water efficiency measures implemented as a part of LEED® certification, and potential future use of onsite renewable energy systems (see Section 3.14.2.4).

Tenants to be relocated would be placed in Class A office space in the surrounding area, primarily within Orange County (with less than 1 percent of the workforce being relocated to Long Beach, in Los Angeles County). This would represent localized increases in utility demand to providers at these locations; however, relocation would occur at existing locations where it is assumed utility demand forecasting has accounted for full building occupancy. Furthermore, leased spaces would be required to comply with all current GSA policies on green leasing (GSA 2020a), which includes requirements for leased office space to be energy and water efficient. Therefore, any leased space selected under Alternative 1 would likely be more water- and energy-efficient than the existing CHFB. Overall impacts to water and electricity utility providers on a regional scale from tenant relocation would be negligible and beneficial, as there would be an aggregate decrease in utility consumption due to tenants being placed in newer work places with greater utility efficiency.

Stormwater would be managed on site per City and County stormwater management requirements (see Section 3.8, Water Resources); additional stormwater management measures may be implemented to achieve LEED® certification (GSA 2020d). As discussed in Section 3.8.2.2, there would be an increase in the amount of impervious area under Alternative 1, due to the conversion of gravel areas to paved surfaces. However, stormwater runoff would be minimized through the construction of measures such as bioswales, permeable pavement, or other measures including green roofs and water capture technologies. Overall, operation of the new USCIS building would likely result in long-term and minor beneficial impacts to stormwater management within the project area as new development would improve stormwater management systems. No long-term impacts to stormwater management are anticipated from tenant relocation to offsite locations.

Future Redevelopment

Under a renovation scenario, adverse indirect impacts could occur during construction from the renovation of the existing CHFB on the remaining 64.85-acre parcel. Impacts would likely be similar to as described for construction of the new USCIS building and could include the potential for disruptions to utility services. The potential for such impacts would likely depend on the extent of renovation activities, and the degree to which these activities occur outside the existing CHFB footprint. Potential impacts to utility lines could be avoided through coordination with utility companies and by taking steps to protect or move utilities where needed.

Operations under a renovation scenario would likely result in a similar level of demand for utility services as under current conditions. This could result in a net increase in demand on utility providers when considered with operations of the USCIS building, as there could be a net increase of up to 2,000 workers within the existing site. This could result in minor to moderate impacts on local utility providers; however, any future use of the renovated CHFB would likely be coordinated with utility providers to ensure that utility services can either accommodate future development or appropriate infrastructure can be installed to handle increased demand. Additionally, the renovated building would likely be required to comply with applicable updated building code requirements for water and energy efficiency, which could help minimize demand for energy, water, and wastewater services.

Under a demolition/new construction scenario, indirect impacts related to construction may be similar to the impacts described for construction of the USCIS building but could be greater or lesser in magnitude, depending on the size and scale of construction. Operations of a new development would likely generate demand for utility services, which could be greater or less than current conditions depending on future facility design and use. It is likely that future use of the site would result in increased utility demands within the existing CHFB site when considered with operation of the new USCIS building. New development may increase impervious areas at the site, resulting in increased demands on stormwater utilities; however, new development would likely be designed to current, more stringent stormwater standards as discussed in Section 3.8, Water Resources, which could result in long-term beneficial impacts.

Follow-on NEPA or CEQA analyses may be required (depending on who acquires the site) for any proposed redevelopment plans presented by a future developer, to include further consideration of utility demands and associated coordination with utility companies, once final development plans are completed.

3.14.2.3 Preferred Alternative (Alternative 2)

Under the Preferred Alternative, there would be negligible beneficial impacts to utilities and infrastructure on a regional scale. All tenants would be removed from the CHFB and no construction would occur at the site. There would be decreases in demands on utility providers at the existing CHFB site, and localized increases to providers at future leased locations. Relocation would occur at existing locations where it is assumed utility demand forecasting has accounted for full building occupancy, similar to as described for Alternative 1. Therefore, overall impacts to water and electricity utility providers on a regional scale from tenant relocation would be negligible, as there would be an aggregate decrease in utility consumption due

to tenants being placed in newer workplaces with greater utility efficiency. No impacts to stormwater utilities would occur the Preferred Alternative.

Future Redevelopment

Under a renovation/new construction scenario or a demolition/new construction scenario, short-term, minor indirect impacts could occur, similar to as described for construction of the new USCIS building under Alternative 1. There could be short-term increases in demand on water and wastewater utilities, and impacts could be to a greater intensity depending on the size and scale of new construction.

Impacts from operations under a renovation/new construction or a demolition/new construction scenario would likely be similar to the types of impacts described under Alternative 1 Future Redevelopment, but to a greater intensity. Operations of a new development would likely generate long-term increased demands for utility services, which could be greater or less than current conditions depending on the design and scale of redevelopment. Under both scenarios, it is assumed there would be beneficial impacts on stormwater utilities, as redevelopment would likely be designed to current, more stringent standards as discussed in Section 3.8, Water Resources.

Similar to Alternative 1, follow-on NEPA or CEQA analyses may further address utilities and infrastructure and associated coordination with utility companies once final development plans are completed.

3.14.2.4 Impact Reduction Measures

Impacts on utilities would be reduced through the following:

- Adherence to GSA P100 Standards including:
 - Newly constructed buildings must not exceed the energy intensity of 30,978 British Thermal Units (BTU) per square foot per year (btu/sf-yr).
 - Toilets must be dual-flush or low-flow (1.28 gallons per flush [gpf]), urinals must be High Efficiency Urinals (0.5 liters per flush [lpf]), and lavatory faucets must be metered-type with 0.25 gallons per cycle.
- Using native or locally adapted species, xeriscaping, and/or grey water reuse to reduce water consumption. Any reuse of treated wastewater would comply with the water recycling criteria, permitted uses, and other applicable requirements in Title 22 of the California Code of Regulations.
- Reviewing existing utility maps and contacting utility companies ahead of time to identify any locations where construction activities could potentially affect utility lines.
- Coordinating with utility providers in advance of such activities to determine the best course of action to avoid or minimize impacts, either by implementing measures to protect utility lines or by arranging for their temporary or permanent relocation.

Future development may incorporate onsite renewable energy generation and the use of energy- and water-efficient technology; which would further reduce demands on utility providers. GSA would also seek a minimum of a LEED® Gold certification for construction of a new facility onsite, and steps to achieve this would likely include a reduction in the demand for energy and water.

Similar measures regarding review of utility maps and coordination with utility providers during future development planning may occur as part of Alternatives 1 and 2; regardless of ownership.

3.15 RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

Section 102(C)(iv) of NEPA [42 USC § 4332] and 40 CFR 1502.16 require an EIS to address “the relationship between local short-term uses of man’s environment and the maintenance and enhancement of long-term productivity.” This involves the consideration of whether a Proposed Action is sacrificing a resource value that might benefit the environment in the long term, for some short-term value to the project proponent or the public.

The purpose of the Proposed Action is to accommodate the long-term office space requirements for the current tenants located at the CHFB that would meet applicable building, accessibility, and security standards. Furthermore, the purpose is to make such accommodations primarily within the Orange County, California market in a cost-effective manner that would not require substantial personnel relocations or majorly disrupt the federal tenants from achieving their agency mission.

As described in Chapter 3 of this EIS, the primary area affected is a 92-acre site which currently houses the CHFB. The entire site is previously disturbed and lacks surface water resources or viable wildlife habitat. The lot is bordered on all sides by roadways and existing (mostly commercial) development.

The existing CHFB site does not possess existing and enduring resource or environmental values whose long-term potential benefits would be sacrificed to provide for short-term value to the project proponent (GSA). The Proposed Action, if implemented, would last for many decades.

3.16 IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES THAT WOULD BE INVOLVED IN THE PROJECT

Section 102(C)(v) of NEPA [42 USC § 4332] requires EISs to address “any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented.” Irreversible and irretrievable commitments of resources mean losses to or impacts on natural resources that cannot be recovered or reversed.

More specifically, “irreversible” implies the loss of future options. Irreversible commitments of resources are those that cannot be regained, such as permanent conversion of wetlands and loss of cultural resources, soils, wildlife, agricultural and socioeconomic conditions. The losses are permanent and incapable of being reversed. “Irreversible” applies mainly to the effects from use or depletion of nonrenewable resources, such as fossil fuels or cultural resources, or to those factors, such as soil productivity, that are renewable only over long periods of time.

“Irretrievable” commitments are those that are lost for a period of time, such as the temporary loss of timber productivity in forested areas that are kept clear for use as a right-of-way, road, or winter sports site. The lost forest production is irretrievable, but the action is not irreversible. If the use changes back again, it is possible to resume timber production.

3.16.1 Irreversible Commitments of Resources

Under both the Hybrid Lease/Construction Alternative (Alternative 1) and the Preferred Alternative - Lease Relocation (Alternative 2), the following irreversible commitments of resources would occur:

- Consumption of fossil fuels (primarily diesel) and lubricants by heavy construction equipment (e.g., bulldozers and Caterpillars, graders, scrapers, excavators, loaders, trucks) used to excavate and develop the 27.15-acre parcel for the new USCIS building (Alternative 1 only);
- Consumption of fossil fuels (primarily diesel) and lubricants by heavy construction equipment used to construct the new USCIS building (Alternative 1 only);

- Materials used to construct the new USCIS building, including cement/concrete, soil cement, steel, iron and other metallic alloys, copper wiring, PVC pipe, plastic, etc. (Alternative 1 only); and
- Energy, supplied by fossil fuels or some other source of electricity, used over the operational life of the new USCIS building and used at new lease locations (Alternative 1 and 2).

3.16.2 Irretrievable Commitments of Resources

As noted above, “irretrievable” commitments of resources are those that are lost for a period of time, but not permanently. Alternative 1 would entail the long-term loss of minimal amounts of vegetation within the 27.15-acre parcel to be developed.

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CHAPTER 4 CUMULATIVE IMPACTS

4.0 CUMULATIVE IMPACTS

Cumulative impacts are defined by the CEQ regulations in 40 CFR 1508.7 as “the impact on the environment which results from the incremental impact of the [proposed] action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such actions. Cumulative impacts can result from individually minor, but collectively significant, actions taking place over a period of time.” Cumulative impacts include the direct and indirect impacts of a project together with the past, present, and reasonably foreseeable future actions of other projects. According to CEQ’s cumulative impacts guidance, the cumulative impact analysis should be narrowed to focus on important issues at a national, regional, or local level.

The City of Laguna Niguel has experienced steady population and economic growth over the last few decades. Past and ongoing major actions in the area were and are primarily associated with residential and mixed-use development and development of supporting infrastructure such as roadways. Current and foreseeable future federal and local development projects within and in the vicinity of the CHFB site are identified below.

4.1 FEDERAL PROJECTS

4.1.1 I-5 Widening Project from El Toro Road, South to SR-73

I-5 is a major interstate located approximately 4 miles east of Laguna Niguel that runs north to south and connects the local community near the CHFB to major cities such as Los Angeles and Anaheim. This project will add one general purpose lane in both the northbound and southbound directions from Avery Parkway to Alicia Parkway. The project will also extend the second carpool lane in each direction from Alicia Parkway to El Toro Road. New auxiliary lanes at 6 locations will be constructed and auxiliary lanes at 6 other locations will be reestablished. Construction is scheduled to begin in mid-2020 and be completed by 2023 (The Orange County Register 2018).

4.1.2 Aliso Creek Estuary Restoration

The Aliso Creek Estuary Restoration project includes the restoration of an approximately a five-mile stretch of the Aliso Creek near Laguna Niguel to create a fully functional estuary (USACE 2017). The conceptual plan for the project includes removal of the concrete channel and restoration of riparian habitat, as well as the demolition and relocation of a parking lot. The estuary restoration project also consists of widening the channel so that marshlands can more efficiently filter water and provide high value habitat for wildlife. The environmental impact analysis phase of this project is currently ongoing (Laguna Beach Independent 2020).

4.2 LOCAL PROJECTS

4.2.1 Crown Cove Condominiums

The Crown Cove Condominiums project includes the construction of a residential development consisting of 23 multi-family units at 30667 Crown Valley Parkway, Laguna Niguel. This project is located approximately 3 miles south of the CHFB and is currently awaiting approval to begin construction.

4.2.2 City Center Mixed Use Development

The City Center Mixed Used Development project includes the development of approximately 200,000 square feet of mixed-use commercial space and 275 residences with a series of public open spaces in Laguna Niguel. The project will occur on approximately 25 acres located approximately 3 miles south of the CHFB at the intersection of Crown Valley Parkway and Alicia Parkway, adjacent to City Hall. Commercial development will primarily include restaurants and other food service industries. Residences will be

designed as single-floor apartments and two-story townhomes. This project is currently awaiting approval to begin construction. (City of Laguna Niguel 2020c).

4.2.3 SunPointe Single-Family Dwelling Units

The proposed SunPointe residential development, approved for construction, will provide 53 single-family homes ranging from 2,600 square feet to 3,140 square feet, each with a two-car garage in Laguna Niguel, approximately 3.5 miles southeast of the CHFb. The proposed project would recontour a 19.5-acre site through approximately 325,000 cubic yards of cut and fill and grading. Multiple retaining walls, up to 18 feet tall, are proposed to create 53 lots with curvilinear slopes. Other development would include infrastructure improvements, common open-space areas, perimeter fencing, slope landscaping, and completion of an existing quarter mile segment of the Colinas Bluff Trail, which traverses through the northern portion of the project site. (City of Laguna Niguel Planning Commission 2019a).

4.2.4 Forbes Road Mixed-Use Development

The mixed-use development project, approved for construction, includes the development of 111 two- and three-bedroom senior assisted living condominiums in Laguna Niguel, approximately 2 miles east of the CHFb at 2776 Forbes Road. The proposed condominiums will be situated above 2,700 square feet of ground-floor retail to include a pool, fitness center, private garden, bike shop, EV charging stations and a sky deck. This project is located on Forbes Road, less than 1 mile north of the Laguna Niguel Metrolink station (Bisnow 2018).

4.2.5 Multi-Family Apartment Development

The apartment development project, under construction, includes development of a 425-unit multi-family development on a 6.4-acre project site in Laguna Niguel, approximately 2 miles east of the CHFb at 27930 Cabot Road. This development will consist of two separate apartment communities, including a 233-unit podium-style building and a 192-unit wrapped building. The 233-unit building will consist of five stories above a three-level parking garage. The 192-unit building will consist of four stories surrounding a five-level parking structure (City of Laguna Niguel Planning Commission 2019b).

4.2.6 Aliso Viejo Ranch

The Aliso Viejo Ranch project is located at 100 Park Avenue, Aliso Viejo, CA, approximately 1.5 miles north of the CHFb. The project includes restoration of historically significant buildings, artifacts, and farming equipment from the 1800s. Construction of this project is ongoing and the plans include the rehabilitation and adaptive use of the existing barn and bunkhouse along with construction of a working farm and several fishponds to be harvested biannually (City of Aliso Viejo 2020a).

4.2.7 Aliso Viejo Town Center Revitalization

The proposed Aliso Viejo Town Center Revitalization project includes the redevelopment of the former Lowe's site in Aliso Viejo, California to support the vision of Aliso Viejo Town Center. The concept plan released in 2015 includes new construction of commercial, residential, office, parking, and hotel structures. The majority of the new construction is planned to be within the Gateway District in Downtown Aliso Viejo, approximately 1 mile northeast of the CHFb. In the Fall of 2019, the City began to reach out to property owners within Town Center to discuss the findings of various analyses and began to prepare the site for future development (City of Aliso Viejo 2020b).

4.2.8 Dana Point Harbor Revitalization

The Dana Point Harbor Revitalization project includes construction of two proposed hotels, a surf museum, a separated entrance for boaters, a parking structure, and other retail stores (TheLog 2019). The first phase of the project will include the construction of the three-level parking structure and commercial space totaling 190,000 square feet along the waterfront, approximately 9 miles south of the CHFb. Construction

for the first phase of this project is expected to begin in the Summer of 2020 (The Orange County Register 2019).

4.3 CULTURAL RESOURCES

Under Alternative 1, there would be adverse effects and moderate permanent significant impacts on the historic property (CHFB) from partial demolition of the landscaping and site plan, and from visual impacts related to the loss of views to and from the historic property. A potential also exists for adverse effects (under NHPA) and significant impacts (under NEPA) to archaeological resources during construction as the site has not been previously surveyed for archaeological potential. These effects, however, could be mitigated through monitoring during construction and ground-disturbing activities by a qualified archaeologist, and are being handled through the Section 106 process.

No projects identified in Section 4.1 or 4.2 would have the potential to affect viewsheds of the CHFB; therefore, no cumulative impacts to the historic property would occur. No other ground disturbance would occur within the APE by any projects identified in Section 4.1 and 4.2; therefore, there would be no cumulative impacts to archeological resources within the APE. Archaeological resources could be present on undisturbed sites where construction is proposed for other projects discussed in Sections 4.1 and 4.2, outside of the APE. When considered on a regional scale, there could be a regional cumulative significant impact to archaeological resources when combined with the Proposed Action, particularly if the resources were impacted in the process of conducting site work. Proposed projects subject to compliance with NEPA and/or CEQA with the potential for significant impacts on cultural resources have been or will be evaluated, including required consultations with regulatory agencies and stakeholders, such as SHPO and tribal governments. Potentially significant impacts would be mitigated, through avoidance when possible.

Under Alternative 1 and 2, disposal of the property out of federal ownership could result in adverse effects (under NHPA) and permanent significant impacts (under NEPA), pending completion of the Section 106 process. Similarly, any future renovation or demolition activities of the CHFB could result in adverse effects and significant impacts. Future redevelopment may also result in visual impacts related to the loss of views to and from the historic property under a renovation scenario. However, as no other project in Section 4.1 or 4.2 are within the APE of the Proposed Action, no cumulative impacts to historic properties within the APE would likely occur from the disposal out of federal ownership or future redevelopment.

Similar to construction of a USCIS building under Alternative 1, future development at the site could result in impacts to archaeological resources, which when considered on a regional scale with other development could result in adverse effects and significant impacts to archaeological resources. Proposed projects subject to compliance with NEPA and/or CEQA that have the potential for significant impacts on cultural resources will be evaluated, including required consultations with regulatory agencies and stakeholders, such as SHPO and tribal governments. Potentially significant impacts would be mitigated, through avoidance when possible.

Under the No Action Alternative, there would be no impacts or effects to cultural resources as the CHFB would remain in federal ownership; therefore, there would be no cumulative impacts when considering past, present, or future projects.

4.4 AIR QUALITY AND GREENHOUSE GAS EMISSIONS

Under Alternatives 1 and 2, there would be emissions of criteria pollutants, GHGs, and fugitive dust during the construction phase. Predicted annual construction emissions would be less than federal *de minimis* thresholds for criteria pollutants and represent a negligible amount of California's annual GHG emissions. As stated in Section 3.3.1.1, the region is in nonattainment area for O₃ and PM_{2.5} and is currently designated as a maintenance area for CO, NO₂, and PM₁₀. Construction-related air emissions from existing and future development projects within and in the vicinity of the CHFB are expected to minor and primarily end following construction; this includes the future development/renovation and demolition scenarios

considered under Alternative 1 and the Preferred Alternative. Similar to the impact reduction measures described in Section 3.3, fugitive dust would be required to be controlled via state regulations. In addition, construction activities at the CHFB site would be unlikely to occur at the same time as the other projects described in Sections 4.1 and 4.2. Both the use of impact reduction measures and temporal separation would reduce and minimize the potential for cumulative adverse impacts in conjunction with the Proposed Action.

Projects described in Sections 4.1 and 4.2 involving the development of new facilities along with future development of the CHFB site considered in Alternatives 1 and 2 could also generate operational emissions, which could cumulatively contribute to emissions of pollutants regulated for nonattainment status. These projects, however, would be subject to review and permitting approval to ensure construction and operational air emission are within applicable limits and do not violate any local or regional air quality plans. Therefore, cumulative impacts under Alternative 1 and the Preferred Alternative in combination with other future development projects identified in Sections 4.1 and 4.2 would be less than significant.

Under the No Action Alternative, there would be negligible emissions from ongoing maintenance, generator usage, and vehicle trips. When considering past, present, or future projects, cumulative impacts would be negligible.

4.5 SOCIOECONOMICS

Under Alternative 1 and 2, there would be short-term, beneficial impacts from increasing construction jobs, local spending in the community, and associated tax revenue. All projects identified in Section 4.1 and 4.2 would create minor cumulative beneficial impacts, similar to as under the Proposed Action Alternatives.

Under Alternative 1 and 2, there would be between 1,000 to 3,000 jobs relocated from the local Laguna Niguel workforce and relocated to various locations around the County. This would result in localized moderate adverse effects from job loss, decrease in spending near Laguna Niguel, and potential indirect job loss; however, there would be overall negligible impacts in the County as socioeconomic benefits would be redistributed. New development projects discussed in Sections 4.1 and 4.2, particularly those associated with long-term job creation such as the mixed use developments, Aliso Viejo Town Center Revitalization, and Dana Point Harbor Revitalization, as well as future development at the CHFB site, would offset some of the localized impacts experienced in Laguna Niguel, and result in long-term, negligible, beneficial cumulative impacts.

Under Alternative 1 and 2, some or all of the current CHFB site would be transferred out of federal ownership, resulting in an increase in taxable land and tax revenue for local, state, and federal governments. When combined with new development projects, this would result in a long-term, beneficial cumulative impact.

Under the No Action Alternative, beneficial cumulative impacts would be expected when considering new development projects.

4.6 GEOLOGY, SEISMICITY, AND SOILS

Under Alternatives 1 and 2, there would be short-term, minor impacts to soils from soil disturbance and long-term negligible impacts to geology and soils as a large portion of the CHFB site has been previously disturbed. All development projects identified in Section 4.1 and 4.2, along with the future development scenarios considered in Alternatives 1 and 2 could result in some level of local soil disturbance or soil loss from construction activities. As the Proposed Action would have negligible impacts to soils and geology, GSA activities would not contribute to cumulative adverse impacts to these resources in combination with future development projects. In addition, similar to the Proposed Action, any future development may be subject to the same California stormwater permitting requirements as described for Alternative 1, which would limit soil loss on site and reduce potential for cumulative adverse impacts once construction is completed. No cumulative adverse impacts would be anticipated to seismicity; new construction under the Proposed Action and for future development projects would be conducted in accordance with current

California Building Code and would minimize the threat of loss of life and property to occupants from seismic hazards, resulting in beneficial impacts.

Under the No Action Alternative, minor amounts of maintenance could be required, which could result in negligible amounts of land disturbance. This would result in negligible cumulative effects when considered with other development projects in the area.

4.7 LAND USE

Under Alternatives 1 and 2, temporary and minor adverse impacts could affect surrounding businesses and residential areas from fugitive dust, increased traffic volumes, or noise generated by construction activities. As these impacts would be temporary and timing of construction would likely vary between projects, it is unlikely that significant cumulative adverse impacts to land use would result from construction of the Proposed Action in combination with the other projects identified in Sections 4.1 and 4.2 or future projects which could occur on the CHF B site.

The operation of the new USCIS building under Alternative 1 would be similar to the existing land use of the adjacent CHF B; therefore, no impacts to land use would occur and there would be no adverse cumulative effects. Any new zoning for new development whether at the CHF B site or for projects described in Sections 4.1 and 4.2 would be expected to be consistent with existing zoning in the area, further minimizing the potential of adverse effects from an individual project and on a cumulative basis.

No construction or future development would occur under the No Action Alternative. Therefore, no cumulative impacts to land uses would occur.

4.8 VISUAL RESOURCES AND AESTHETICS

The immediate area near the CHF B is part of a developed residential and commercial landscape. Based on the perspective of the viewer, construction of a new USCIS building under Alternative 1 could be seen as having either an adverse or beneficial impact on visual resources in the project area. Facility development and renovation under Alternatives 1 or 2 could be seen as beneficial since it is consistent with the existing character of the landscape and would contribute to greater cohesion in views of the landscape. It could be seen as adverse if the viewer values more open space or undeveloped land, even within a developed landscape. This perspective could be applied to any of the facility development projects that may occur in the area, including future development on the CHF B site or from projects identified in Sections 4.1 and 4.2. Thus, from a visual standpoint, impacts resulting from development that would occur from construction of a new USCIS building combined with any or all of the projects discussed in Section 4.1 and 4.2 could be perceived as either cumulatively adverse or cumulatively beneficial. Regardless of the perspective, cumulative impacts to visual resources are not likely to be significant since the landscape is already heavily developed. In addition, it is unlikely that construction of the projects would all occur at the same time, therefore, the potential for cumulative adverse visual effects from multiple construction sites would be unlikely and would also be geographically separated in the region.

No new construction or change in the visual landscape would occur under the No Action Alternative. Therefore, no cumulative impacts to visual resources would occur.

4.9 WATER RESOURCES

Under Alternatives 1 and 2, there would be short-term, minor impacts from the potential for sedimentation and the potential for spills during construction to travel offsite into Aliso Creek, which is currently impaired for nutrients, metals, toxicity, and pesticides. A majority of projects discussed in Sections 4.1 and 4.2, along with potential projects associated with future development of the CHF B are also located in the same watershed which could have the potential for indirect cumulative adverse effects to water quality and hydrology of the stream from construction activities and increased stormwater runoff from additional impervious surface in the watershed. The potential for significant cumulative adverse effects, however,

would be reduced similar to as for the Proposed Action, as all development projects would be subject to the same California stormwater permitting requirements that would limit runoff. In addition, the Aliso Creek Estuary Restoration project would result in beneficial impacts to water quality and potentially stormwater flows as the concrete channel is removed from the creek, and natural habitat is restored.

No new construction would occur under the No Action Alternative. Therefore, no cumulative impacts to water resources would occur.

4.10 BIOLOGICAL RESOURCES

Under Alternatives 1 and 2, there would be minor impacts from vegetation loss and indirect impacts on local habitat from increased noise levels and stormwater runoff during construction. No impacts to special status species would occur as project area is highly developed and offers low quality habitat.

Development projects discussed in Section 4.1 and 4.2 along with future development projects at the CHFEB site could all result in some level of similar impacts on vegetation and habitat. Some projects are located on currently undeveloped land (i.e., Aliso Viejo Ranch, 27930 Cabot Road), which could result in greater amounts of vegetation loss or habitat disturbance. However, all projects are located within or adjacent to highly developed areas in within Laguna Niguel, Aliso Viejo, or Dana Point, and overall cumulative impacts to habitat would be minor. These projects, including the CHFEB site, although within the Aliso Creek watershed, would be located outside of the Aliso Creek riparian corridor and, therefore, would have negligible direct effects on the corridor for wildlife connectivity between the Cleveland National Forest and the Aliso Woods Canyon Wilderness Park.

Past and continued urbanization within the Aliso Creek watershed, however, has caused indirect effects to the quality of habitat within Aliso Creek, including the degradation of riverine (aquatic and riparian) habitat quality as a result of hydrologic alterations, floodplain function loss, channel modifications, loss in contributing sediment sources, channel instability (streambed incision and streambank erosion), and introduction and spreading of non-native plant species (USACE 2017). All projects, however, would be subject to stormwater permitting design requirements that would limit the amount of stormwater runoff offsite, reducing the potential for long-term, adverse cumulative effects to riverine habitat of Aliso Creek. In addition, the Aliso Creek Estuary Restoration project would result in long-term, beneficial impacts on wildlife and habitat. When combined with the low potential for adverse impacts under Alternative 1, there would be no more than minor cumulative impacts.

Under the No Action Alternative, no construction or associated impacts on biological resources would occur; therefore, no cumulative impacts would occur.

4.11 TRANSPORTATION AND TRAFFIC

Under Alternative 1, minor adverse impacts could occur near the CHFEB from temporary increases in construction-related traffic. Cumulative effects could occur from construction projects occurring near the CHFEB, if these projects occurred concurrently with construction of the USCIS. With the exception of the Aliso Creek Estuary Restoration project, all projects identified for the cumulative effects analysis are greater than 1 mile from the CHFEB. Therefore, the potential for cumulative impacts would be unlikely due to the distance of other projects to the CHFEB site. Potential cumulative traffic impacts would be minor if construction of the Aliso Creek Estuary Restoration project occurred at the same time as construction of the new USCIS building.

Operations under Alternative 1 and 2 would result in a long-term reduction in trips at the CHFEB site, although trips would be redistributed throughout the County. When considered with other projects in Section 4.1 and 4.2 that could increase traffic (e.g., residential and commercial development projects), this could result in minor cumulative impacts to the transportation infrastructure in the area near the CHFEB site. Similar to Alternative 1, it is assumed traffic impacts (including cumulative impacts) associated with the

increased traffic to future offsite office locations has been considered in previous CEQA analyses when the respective office buildings were originally reviewed and approved by local City staff.

During construction for future redevelopment, minor cumulative impacts would be anticipated, similar to as described for construction of the new USCIS building. During operations of any future redevelopment, there could be minor to significant indirect impacts, dependent upon the size and scope of new development to occur on the parcel and associated change travel patterns, traffic volumes within the study area, and VMT. Future redevelopment could result in moderate to significant long-term cumulative impacts in the area, depending on the extent of the development, when considered with other future development projects discussed in Section 4.2.

4.12 HAZARDOUS WASTE AND MATERIALS

Under Alternatives 1 and 2, project-specific impacts from hazardous waste/materials would be reduced through conformance with applicable regulatory requirements and implementation of appropriate avoidance, minimization and mitigation measures as required by OSHA and RCRA. These requirements may also apply to the construction and operation of other nearby projects and potential future development projects at the CHFEB site. Therefore, the potential adverse cumulative impacts associated with hazardous waste and materials would not be significant when considered with other present and future projects within the vicinity of the CHFEB.

Under the No Action Alternative, maintenance and repairs to the CHFEB would continue to occur as needed but would likely only generate minor amounts of hazardous waste. Therefore, significant cumulative impacts would not be expected.

4.13 NOISE

Under Alternatives 1 and 2, minor to moderate adverse effects could occur from construction activities and operations. Cumulative effects to the ambient soundscape near the CHFEB could occur from construction projects occurring within 1,000 feet of the CHFEB (i.e., future development at the CHFEB site and the Aliso Creek Estuary Restoration project), if these project occurred concurrently with construction of the USCIS (as noise impacts from construction are greatest within 1,000 feet). Project schedules are currently unknown, but if the projects did occur at the same time, no more than minor cumulative impacts are anticipated. Projects would be required to comply with the same noise reduction measures as described for Alternative 1.

With the exception of the Aliso Creek Estuary Restoration project, all projects identified for the cumulative effects analysis are greater than 1 mile from the CHFEB. Therefore, the potential for noise from the project to cumulatively and adversely add to the noise environment from construction and operations of other projects identified in the region would not be anticipated. In the long term, Alternative 1 would result in a localized long-term decrease in ambient noise at the CHFEB, as up to 1,000 fewer trips would be traveling to the site; however, these trips would be distributed to newly leased locations throughout the County.

Under the Preferred Alternative, build-outs of office space would occur primarily indoors and would not require any ground disturbance. Noise impacts associated with these activities would be much smaller/negligible compared with the existing cumulative noise. There would be localized long-term, beneficial impacts from a decrease in 3,000 trips to the existing CHFEB site; however, these trips would be distributed to newly leased locations throughout the County.

Under the No Action Alternative, no construction would occur and cumulative impacts would not be expected.

4.14 ENVIRONMENTAL JUSTICE AND PROTECTION OF CHILDREN'S HEALTH AND SAFETY

Under Alternative 1, construction activities associated with construction of a new USCIS building and other projects would create both adverse and beneficial, minor cumulative impacts to minority and youth populations near the project area. Cumulative, adverse impacts from increased air emissions and congestion could be synergistic if the construction of Alternative 1 and the other projects occur at the same time. Area residents may experience time delays over a longer period of time if the construction periods from these projects are considered sequentially. Health impacts and economic benefits would occur in a similar manner. As discussed in Section 4.13, noise levels in or around Laguna Niguel, would not likely cumulatively increase due to ongoing projects. When considered with construction of Alternative 1, projects discussed in Section 4.1 and 4.2 are expected to create minor, adverse and beneficial cumulative impacts once construction activities are completed. Besides potential separation in time when a given project would be constructed, the potential for cumulative adverse impacts from the project in combination with projects identified in Sections 4.1 and 4.2 would also be reduced by the distribution these projects throughout the region as none are concentrate within a specific location.

In the long term, both Alternative 1 and 2 could have minor to moderate, localized impacts on environmental justice populations due to a decrease in jobs in the Laguna Niguel community and associated decreases in economic activity. As with socioeconomics, new development projects discussed in Sections 4.1 and 4.2, particularly those associated with long-term job creation such as the mixed use developments, Aliso Viejo Town Center Revitalization, and Dana Point Harbor Revitalization, as well as future development of the CHFB site, would offset some of the localized impacts experienced in Laguna Niguel, and result in long-term, negligible cumulative impacts. No impacts to children populations are anticipated for either Alternative 1 or 2; therefore, no cumulative impacts would occur.

Under the No Action Alternative, no construction or relocation would occur, resulting in no cumulative impacts to environmental justice or children populations.

4.15 UTILITIES AND INFRASTRUCTURE

Continued population growth in the Orange County and Laguna Niguel area has the potential to cause strain to water, wastewater and electrical generation and transmission utilities. Southern California Edison Company is responsible for providing electricity and Southern California Gas provides natural gas to accommodate increases in demand due to population growth in the area. The MNWD is responsible for providing water and wastewater services to the CHFB and the greater Laguna Niguel Area.

Under Alternative 1 and 2, there would be localized decreases in utility demands due. For Alternative 1, there would be a reduction in 1,000 employees at the CHFB site, and the employees remaining on site would be placed in a building that would have greater water and energy efficiency. For the Preferred Alternative, there would be a localized reduction of 3,000 employees at the site, but comparable increases at new lease locations that could result in adverse effects to local utilities in those areas. Development projects in the Laguna Niguel area would result in varying levels of increased demands on local utility companies and utility infrastructure near Laguna Niguel. When considered with both Alternatives 1 and 2, there would be overall negligible to minor cumulative impacts. Under both alternatives, future development scenarios would likely result in similar negligible to minor cumulative impacts to utilities.

Under the No Action Alternative, there would be no changes to utility usage and no cumulative impacts would occur.

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APPENDIX A: CHFb TENANT RELOCATION EIS SCOPING REPORT

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Chet Holifield Federal Building Tenant Relocation Environmental Impact Statement Final Scoping Report

Prepared for:



General Services Administration
50 United Nations Plaza
San Francisco, CA 94102-4912

Submitted by:



PHE

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April 2020

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ACRONYMS AND ABBREVIATIONS

CEQ	Council on Environmental Quality
CFR	<i>Code of Federal Regulations</i>
CHFB	Chet Holifield Federal Building
EIS	Environmental Impact Statement
GSA	General Services Administration
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NOI	Notice of Intent
SHPO	State Historic Preservation Officer
USC	United States Code
USCIS	United States Citizenship and Immigration Service

CHAPTER 1 INTRODUCTION

The United States General Services Administration (GSA) is preparing an Environmental Impact Statement (EIS) to analyze the potential impacts from the proposed relocation of the tenants from the Chet Holifield Federal Building (CHFb) as required by the National Environmental Policy Act (NEPA) of 1969 (42 United States Code [USC] 4321-4347), the Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508), and the GSA Public Building Service's NEPA Desk Guide.

GSA conducted public scoping and held a scoping meeting as part of the NEPA process associated with the development of the EIS. This report describes the project (i.e., background, project location and facilities, proposed action and alternatives) and public scoping meeting, provides scoping materials used, and summarizes the public comments received as part of the scoping meeting held on October 2, 2019 and through the public scoping period announced in the *Federal Register* which ended on December 17, 2019. This document also includes the following nine appendices:

- Appendix A: *Federal Register* Notice
- Appendix B: Newspaper Affidavits
- Appendix C: Letter to Interested Parties
- Appendix D: Advertising on Social Media
- Appendix E: Scoping Meeting Poster Display
- Appendix F: Scoping Comment Form
- Appendix G: Scoping Meeting Handout
- Appendix H: Scoping Meeting Sign-In Sheets
- Appendix I: Index of Comments by Source and Date

CHAPTER 2 PROJECT DESCRIPTION

The CHFB is located on a 92-acre site in Laguna Niguel, California and is the sole federally-owned facility in south Orange County, California (see Figure 2-1). Currently the working space for the tenants of CHFB does not meet applicable building code, accessibility, and security standards. The project is considering alternatives to providing office space that meets required standards.

2.1 PROJECT LOCATION

See Figure 2-2 for a map of the project area and vicinity. The property is located in a high value real estate suburban area comprised of retail and residential zones and is primarily used for federal office space.



Figure 2-1. Chet Holifield Federal Building Project Location



Figure 2-2. Existing Chet Holifield Federal Building Property

2.2 EXISTING FACILITIES

The CHF� is approximately 1 million square feet in size located on a 86.5-acre parcel, with an additional 5.5-acre central utility plant parcel north of Avila Road. The building was designed by William L. Pereira, a significant California architect recognized for his contribution to notable works such as the Los Angeles County Museum, the Transamerica Pyramid, and the Theme Building at Los Angeles International Airport. The building has six stories plus a partial underground section and mechanical penthouse. The building is multi-tiered with the largest floor area on the first floor and building floors continually reducing in size with each added level. A central utility plant is located across the street to the north from the original building main entrance on the 5.5-acre parcel. A loading dock is located on the north end of the building. Two guard stations are located on the property; one of which is no longer in use. Additional structures within the 86.5-acre parcel include a Services Support Building, fire pump house, cooling tower, and thermal energy storage tank. The CHF� is owned by GSA and home to various federal agency tenants, with the United States Citizenship and Immigration Services (USCIS) serving as the largest tenant. Figure 2-3 provides a photo of the CHF�.



Figure 2-3. Chet Holifield Federal Building

2.3 PURPOSE AND NEED

The purpose of the Proposed Action is to accommodate the long-term office space requirements for the current tenants located at the CHF� that would meet applicable building code, accessibility, and security standards. Furthermore, the purpose is to make such accommodations primarily within the Orange County, California market in a cost-effective manner that would not require substantial personnel relocations or majorly disrupt the federal tenants from achieving their agency mission.

The proposed project is needed because the current working space for the tenants does not meet GSA's current building, accessibility, and security standards. Other than some energy-related modifications, there have been no modifications to the CHF� since the 1980s. Most of the building's infrastructure is beyond its useful life and deficiencies have been documented in all major mechanical and electrical systems

including life-safety, fire protection, and fire sprinkler systems. Additionally, numerous issues exist, including the presence of asbestos containing materials and the need to improve the building's response to future seismic events.

2.4 PROPOSED ALTERNATIVES

The project entails the relocation of tenants of the CHFB to new office space that meets appropriate applicable building code, accessibility, and security standards. A Feasibility Study was prepared for the project to explore viable alternatives to accommodate the CHFB tenants. Based on this study, and lack of additional alternatives identified during the scoping period, two project alternatives are considered in this EIS that would meet the project purpose and need. The alternatives described and evaluated in this Draft Environmental Impact Statement include two “action” alternatives and one “no action” alternative.

- Alternative 1, which would involve construction of a new federal office building directly adjacent to the existing CHFB for the USCIS and relocating all other tenants into lease space primarily within the Orange County market. The existing building and the remainder of the property not retained for construction of the USCIS building would be turned over to the GSA Real Property Utilization Disposal Division.
- Alternative 2, which would involve relocation of all tenants primarily within Orange County similar to Alternative 1, but would also include a new location for USCIS outside of the existing CHFB property. The existing CHFB and surrounding government property would be turned over to the GSA Real Property Utilization Disposal Division.

The “no action” alternative assumes that the current issues with the CHFB would not be addressed and that operations would continue under current conditions. Minor repairs would occur as needed and maintenance and operation of the existing facilities would continue. This alternative would not meet the purpose and need of the project (see Section 2.3) as tenants would continue to occupy office space that does not meet applicable building code, accessibility, and security standards.

CHAPTER 3 NOTIFICATION OF PROJECT SCOPING

Notification of project scoping for the CHFB Tenant Relocation EIS was accomplished using multiple channels of communication, including a Notice of Intent (NOI) in the *Federal Register*, newspaper ads, letters to interested parties, and social media posts.

3.1 NOTICE OF INTENT

An NOI was published in the *Federal Register* on November 15, 2019. The NOI listed the end of the public scoping comment period as December 10, 2019; however, GSA accepted comments through December 17, 2019. The *Federal Register* notice is included in Appendix A.

3.2 NEWSPAPERS ADVERTISEMENTS

In advance of the NOI publication in the *Federal Register*, GSA published two advertisements in a local newspaper the weeks preceding the October 2, 2019 public scoping meeting (see Chapter 4 for additional information on the scoping meeting). The advertisements indicated GSA's intent to prepare an EIS and conduct a scoping meeting; provided a brief description of the project; identified the public scoping meeting time and location; and included instructions to submit a comment. The advertisement was published in the *Orange County Register* on September 20 and 22, 2019. Affidavits of the legal notices are included in Appendix B.

3.3 INTERESTED PARTIES LETTER

A scoping letter dated September 20, 2019 was mailed to federal agencies, state and local agencies, elected officials, and other interested parties. The letter provided background on the project, a description of the alternatives, scoping meeting details, and instructions on comment submission. A copy of the letter sent to interested parties is included in Appendix C.

3.4 SOCIAL MEDIA

In advance of the October 2, 2019 scoping meeting, the City of Laguna Niguel posted three social media notices on its Facebook and Nextdoor pages, and the City of Laguna Niguel website on September 27, 2019. The Facebook posts briefly summarized the purpose of the meeting and detailed the time, date, and location of the meeting. Screenshots of the postings can be found in Appendix D.

CHAPTER 4 PUBLIC SCOPING MEETING

This section summarizes the public scoping meeting, including a description of the purpose; time, date, and location of the meeting; and meeting format.

4.1 PURPOSE

The purpose of the public scoping meeting is to provide the public with information regarding the proposed project, answer questions, identify concerns regarding the potential environmental impacts that may result from implementation of the proposed project, and gather information to determine the scope of issues to be addressed in the EIS.

4.2 MEETING DETAILS AND LOCATION

The public meeting was held on Wednesday, October 2, 2019 from 4 to 6 PM at the Laguna Niguel City Hall located at 30111 Crown Valley Pkwy, Laguna Niguel, CA 92677. Forty (40) people attended the public meeting.

4.3 OPEN HOUSE FORMAT

An open house format was used to encourage discussion and information sharing and to ensure that the public had opportunities to speak with representatives of the GSA. Informational posters about the proposed alternatives, project background, and ways to provide scoping comments were provided at the meeting. Additional materials available at the public scoping meeting included:

- Sign-in sheet;
- Comment form; and
- Handout.

The posters, comment form, handout, and sign-in sheets from the scoping meeting are included in Appendix E, F, G, and H, respectively.

CHAPTER 5 PUBLIC SCOPING COMMENTS

The GSA invited comments for scoping of the CHFEB Tenant Relocation EIS – more specifically on the key topics that should be covered in the EIS; examples of potential adverse and beneficial impacts from the proposed project; and any other additional, relevant information available. An index of comments by source and date is provided in Appendix I.

5.1 COLLECTING COMMENTS

Comments were submitted to GSA using comment forms, letters, and emails.

5.2 SUMMARY OF COMMENTERS

Comments were indexed based on the source, or commenter. Commenters included federal, state, or local agencies (A) and members of the public (P). Each comment was cataloged with a code based on the source of the comment and the order in which it was received (e.g., P3 was the third comment received by a member of the public). A total of seven commenters provided input during the scoping period. Appendix I includes an index of commenters by type (i.e., agency, public) and date.

5.3 ISSUES IDENTIFIED DURING SCOPING

Each concern or question associated with a commenter was categorized by resource area. Comment categories, discussed in the following sections, include alternatives; cultural resources; air quality; floodplains; transportation and traffic; and public involvement (see Table 5-1). A total of 29 comments were received. The U.S. Geologic Survey responded on November 11, 2019 indicating they had no comment to provide.

Table 5-1. Commenters and Comments by Category

Category	Number of Commenters	Number of Comments
Alternatives	5	5
Cultural Resources	3	4
Air Quality	2	6
Transportation and Traffic	2	2
Water Resources	2	5
Biological Resources	1	3
Hazardous Materials	1	1
Public Involvement	2	2
Cumulative Effects	1	1

5.4 SUMMARY OF COMMENTS BY CATEGORY

5.4.1 Alternatives

Five comments were received from five commenters regarding project alternatives.

Three commenters expressed either opposition to the project or support for the No Action Alternative. One commenter expressed general opposition to government spending on new federal construction and contended that the building should continue to be utilized. A second commenter expressed support for the No Action Alternative of continued building operation, and opposition to construction of a new building or

relocating tenants. The commenter indicated the building is safe to occupy and expressed concern with the building sitting vacant for years at a time or being utilized by the state or county for purposes never intended. A third commenter expressed general support of having the building remain in its current use.

One commenter provided a comment in support of reuse of the site. The commenter expressed general support for an alternative to build a new federal building and conversion of the remaining space for local community use. The commenter also indicated that future re-use of the site should not include high-rise apartments and expressed support for parks, music venues, theaters, or other recreational space. The commenter also remarked generally that the property has been underutilized due to amount of unused parking area.

One commenter expressed concern that relocation of federal tenants could affect the services each federal agency provides given the need to provide services from new physical locations and because relocation could occur over a lengthy period of time. The commenter requested the criteria for relocation choices be included in the EIS for comparison with the No Action Alternative.

5.4.2 Cultural Resources

Four comments were received by three commenters regarding cultural resources.

One commenter provided a comment indicating the building is architecturally unique and expressed general support to have the building remain in Federal ownership.

One commenter provided two comments regarding cultural resources. One comment indicated generally that the project must be evaluated under Section 106 of the National Historic Preservation Act and that the State Historic Preservation Officer (SHPO) should be consulted. The second comment indicated that there is high potential for buried archaeological deposits, including possible human remains of indigenous people, in the region given the history of the area. The commenter requested a qualified archaeologist conduct a literature and records search at the South Central Coastal Information Center, and if deemed warranted, conduct an archaeological survey. The commenter also requested that a qualified archaeological monitor be present during any ground disturbing activities affecting previously undisturbed soils, and that the identification of archaeological materials not be left to the discretion of construction personnel.

One commenter provided a comment noting the building's age and distinct architecture have made it a candidate for nomination to the National Register of Historic Places, and that "renovation and adjacent building construction could have implications for historic preservation". The commenter recommended GSA consult with the SHPO and include in the EIS any historic preservation plans for the action alternatives.

5.4.3 Air Quality

Six comments by two commenters were received regarding air quality.

One commenter noted that disposal of the federal building could require federal employees who live in this area to commute further, resulting in increased air pollution.

One commenter noted the project is located in an area designated as extreme non-attainment with National Ambient Air Quality Standards (NAAQS) for 8-hour Ozone, and serious non-attainment for NAAQS for PM 2.5, and expressed concerns that the project may increase diesel particulate matter emissions from trucks and construction equipment, and generate fugitive dust. The commenter provided four recommendations for the EIS: 1) include a detailed discussion of baseline air quality conditions and discuss

impacts from renovation and construction; 2) include estimates of all criteria pollutant emissions and diesel particulate matter emissions to be generated from the proposed project; including total truck trips and off-road construction equipment use; 3) coordinate with the South Coast Air Quality Management District to determine general conformity for the project, and disclose the conformity determination; and 4) include a Construction Emissions Mitigation Plan in the Draft EIS and adopt the plan in the Record of Decision. The commenter provided a detailed list of mitigation measures to be included in the Mitigation Plan to reduce impacts associated with emissions of ozone precursors, particulate matter, and other toxics from construction related activities.

5.4.4 Transportation and Traffic

Two comments by two commenters were received regarding traffic and transportation.

One commenter noted generally that disposal of the federal building could require federal employees who live in this area to commute further, resulting in increased traffic.

One commenter noted relocations could either lengthen car trips or encourage transit alternatives and reduce overall emissions compared to the No Action Alternative. This commenter recommended GSA develop a representative travel survey of public customers who use the services at the CHFEB, and analyze the travel modes they prefer, to better inform relocation decisions.

5.4.5 Biological Resources

One commenter provided three comments on potential impacts to biological resources. Comments were provided on the Aliso Creek and its function as wildlife habitat. The commenter noted the creek is an important corridor for wildlife connectivity between the Cleveland National Forest and the Aliso and Woods Canyons Wilderness Park, and expressed concerns regarding sedimentation of the creek through stormwater runoff. The commenter recommended GSA coordinate with the Santa Ana Regional Water Quality Control Board to identify appropriate measures to avoid, minimize, and mitigate potential runoff or other impacts to water quality in the Aliso Creek watershed. The commenter also recommended GSA coordinate with U.S. Fish and Wildlife Service and California Department of Fish and Wildlife to identify potential indirect impacts from the proposed project to plant and animal wildlife in the Aliso Creek watershed, and commit to effective mitigation measures.

5.4.6 Water Resources

One commenter submitted two comments regarding floodplain management. One comment summarized the federal requirements related to floodplains that were applicable to the project. A second comment included requests of the GSA to review Flood Insurance Rate Maps for Orange County and City of Laguna Niguel (last revised March 21, 2019), and that GSA consult with local community floodplain manager for Laguna Niguel and Orange County for the project. The commenter also provided the local community floodplain manager contact information.

One commenter submitted two comments on low impact development and one comment on surface water resources. The commenter noted that new construction is subject to GSA's P100 standards, and leased spaces may be subject to the same requirements. The commenter also noted other federal green building initiatives such as low-impact development to improve stormwater management may also apply. The commenter recommended GSA describe all building and sustainable development considerations (including footprint energy, water, and resource conservation, and renewable energy measures) that will be a part of the action alternatives. The commenter also noted the Proposed Action could affect the Aliso Creek during construction, specifically from sedimentation of the creek through stormwater runoff.

5.4.7 Hazardous Materials

One commenter provided a comment regarding potential impacts from asbestos. Specifically, the commenter requested GSA disclose if any of the action alternatives would involve partial building occupation by federal tenants while asbestos abatement activities occurred, and if so what mitigation measures would be taken to protect occupant and public health.

5.4.8 Public Involvement

Two commenters each provided a comment expressing disappointment with the open house format of the public scoping meeting, indicating it was difficult to hear information. Both comments expressed support for a presentation and question and answer session.

5.4.9 Cumulative Impacts

One commenter provided a comment regarding cumulative impacts. The commenter recommended GSA analyze impacts that could result from reasonably foreseeable projects in the area of the proposed actions for the CHFB.

CHAPTER 6 LIST OF PREPARERS

GSA prepared the various scoping materials and report with contractual assistance from Potomac-Hudson Engineering, Inc. (PHE). The following individuals were primarily responsible for the development and review of the scoping materials and report:

- Osmahn Kadri (GSA) – NEPA Program Manager and EIS Project Manager
- Paul DiPaolo (PHE) – EIS Project Manager/Reviewer
- Melissa Secor (PHE) – Environmental Scientist/Author
- Deborah Shinkle (PHE) – Environmental Scientist/Author

APPENDIX A: FEDERAL REGISTER NOTICE

Comments regarding each of these applications must be received at the Reserve Bank indicated or the offices of the Board of Governors, Ann E. Misback, Secretary of the Board, 20th Street and Constitution Avenue NW, Washington, DC 20551-0001, not later than November 22, 2019.

A. Federal Reserve Bank of Boston (Prabal Chakrabarti, Senior Vice President) 600 Atlantic Avenue, Boston, Massachusetts 02210-2204. Comments can also be sent electronically to BOS.SRC.Applications.Comments@bos.frb.org:

1. *Eastern Bank Corporation, Boston, Massachusetts*; through its subsidiary, Eastern Bank, to retain voting shares of Numerated Growth Technologies, Inc., both of Boston, Massachusetts, and thereby continue to engage in software development and data processing pursuant to section 4(c)(8) of the BHC Act.

B. Federal Reserve Bank of Cleveland (Nadine Wallman, Vice President) 1455 East Sixth Street, Cleveland, Ohio 44101-2566. Comments can also be sent electronically to Comments.applications@clev.frb.org:

1. *Farmers National Banc Corp, Canfield, Ohio*; to acquire Maple Leaf Financial, Inc., and thereby indirectly acquire Geauga Savings Bank, both of Newbury, Ohio, and thereby operate a savings association pursuant to section 4(c)(8) of the BHC Act.

Board of Governors of the Federal Reserve System, November 8, 2019.

Michele Taylor Fennell,
Assistant Secretary of the Board.

[FR Doc. 2019-24736 Filed 11-14-19; 8:45 am]

BILLING CODE P

GENERAL SERVICES ADMINISTRATION

[Notice-PBS-2019-10; Docket No. 2019-0002; Sequence No. 24]

Notice of Intent To Prepare an Environmental Impact Statement (EIS) for the Chet Holifield Federal Building in Laguna Niguel, California

AGENCY: Public Buildings Service (PBS), General Services Administration (GSA).

ACTION: Scoping announcement.

SUMMARY: GSA intends to prepare an EIS to analyze the potential impacts from the proposed alternatives to address the long-term housing of all the tenants of the Chet Holifield Federal Building. The building is owned and managed by GSA and is occupied by various federal agency tenants, with the United States Citizenship and

Immigration Services (USCIS) serving as the largest tenant.

DATES: The Public Scoping Period will begin on Friday, November 8, 2019. Interested parties are encouraged to provide written comments regarding the scope of the EIS on or before Tuesday, December 10, 2019.

ADDRESSES: Written comments can be submitted by either of the following methods:

- *Email:* osmahn.kadri@gsa.gov.
- *Postal Mail/Commercial Delivery:*

ATT: Osmahn Kadri, 50 United Nations Plaza, Room 3345, Mailbox 9, San Francisco, CA 94102.

The views and comments of the public are necessary in helping to determine the scope and content of the environmental analysis.

FOR FURTHER INFORMATION CONTACT: Osmahn A. Kadri, Regional Environmental Quality Advisor/NEPA Project Manager, GSA, at 415-522-3617.

SUPPLEMENTARY INFORMATION:

Background

The Chet Holifield Federal Building was originally built in 1970 by the Aerospace and Systems Group of North American Rockwell Corporation, although it was never occupied by them. The building and site was transferred to the Federal Government for use by federal agencies in March of 1974. As a result of the age and current condition of the Chet Holifield Federal Building, there are a number of issues with the building to be addressed, including abatement of asbestos containing materials and enhancement of the building's structural system.

The development of this project necessitates an Environmental Impact Statement (EIS) under the National Environmental Policy Act (NEPA) and the GSA Public Buildings Service NEPA Desk Guide as well as Council on Environmental Quality Laws, Regulations, and Executive Orders.

Alternatives

The EIS will consider two "action" alternatives and one "no action" alternative. One action alternative consists of relocation of current tenants into lease space primarily throughout the Orange County, California market. Some tenants may be relocated outside of Orange County. The existing Chet Holifield Federal Building and surrounding government property would be turned over to the GSA Real Property Utilization Disposal Division.

The other action alternative consists of construction of a new federal office building south of the existing Chet Holifield Federal Building for the USCIS

and relocating all other tenants into lease space primarily within the Orange County market. The existing building and the remainder of the property not retained for construction of the new Federal Office Building would be turned over to the GSA Real Property Utilization Disposal Division.

The "no action" alternative assumes that the current issues with the Chet Holifield Federal Building would not be addressed and that operations would continue under current conditions.

Dated: November 7, 2019.

Jared Bradley,

Director, Portfolio Management Division,
Pacific Rim Region, Public Buildings Service.

[FR Doc. 2019-24818 Filed 11-14-19; 8:45 am]

BILLING CODE 6820-YF-P

GENERAL SERVICES ADMINISTRATION

[OMB Control No. 3090-0310; Docket No. 2019-0001; Sequence No. 8]

Submission for OMB Review; Nondiscrimination in Federal Financial Assistance Programs, GSA Form 3702

AGENCY: Office of Civil Rights, General Services Administration (GSA).

ACTION: Notice of request for comments regarding an existing OMB clearance.

SUMMARY: Under the provisions of the Paperwork Reduction Act, the Regulatory Secretariat Division will be submitting to the Office of Management and Budget (OMB) a request to review and approve an existing information collection requirement regarding OMB Control No: 3090-0310;

Nondiscrimination in Federal Financial Assistance Programs, GSA 3702. This information is needed to facilitate nondiscrimination in GSA's Federal Financial Assistance Programs, consistent with Federal civil rights laws and regulations that apply to recipients of Federal financial assistance.

DATES: *Submit comments on or before:* December 16, 2019.

FOR FURTHER INFORMATION CONTACT:

Evelyn Britton, Branch Manager, External Programs Branch, Office of Civil Rights, at telephone 202-501-0767 or via email to evelyn.britton@gsa.gov.

ADDRESSES: Submit comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, by any of the following methods:

- *Regulations.gov:* <http://www.regulations.gov>.

Submit comments via the Federal eRulemaking portal by searching the

APPENDIX B: NEWSPAPER AFFIDAVITS

The Orange County Register

2190 S. Towne Centre Place Suite 100
Anaheim, CA 92806
714-796-2209

5196797

POTOMAC-HUDSON ENGINEERING, INC.
5030 CAMINO DEL LA SIESTA, STE 320
SAN DIEGO, CA 92108

AFFIDAVIT OF PUBLICATION

STATE OF CALIFORNIA, }
County of Orange } **SS.**

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the principal clerk of The Orange County Register, a newspaper of general circulation, published in the city of Santa Ana, County of Orange, and which newspaper has been adjudged to be a newspaper of general circulation by the Superior Court of the County of Orange, State of California, under the date of November 19, 1905, Case No. A-21046, that the notice, of which the annexed is a true printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

09/20/2019, 09/22/2019

I certify (or declare) under the penalty of perjury under the laws of the State of California that the foregoing is true and correct:

Executed at Anaheim, Orange County, California, on
Date: September 22, 2019.



Signature

PROOF OF PUBLICATION

Legal No. **0011315746**

Public Scoping Meeting for Chet Holifield Federal Building Environmental Impact Statement

The General Services Administration (GSA) is beginning preparation of an Environmental Impact Statement (EIS) to analyze the potential impacts from the proposed alternatives to address how to accommodate the tenants of the Chet Holifield Federal Building (CHFB). The CHFB is owned by GSA and is home to various federal agency tenants, with the United States Citizenship and Immigration Services (USCIS) serving as the largest tenant.

The CHFB is located in Laguna Niguel, California, between Los Angeles and San Diego. The building is approximately 1 million square feet in size located on an 86.5-acre parcel. An associated 5.5-acre parcel containing a central utility plant for the building is located north of Avila Road. The 92 acres of property is located in a high value real estate suburban area comprised of retail and residential zones and is primarily used for federal office space. The building was originally built in 1970 by the Aerospace and Systems Group of North American Rockwell Corporation. It was never occupied and was transferred to the federal government for use by federal agencies in March of 1974. As a result of the age and current condition of the building, there are a number of issues that must be addressed to continue to use the space in a safe and efficient environment. While there are many issues to be addressed, major concerns include abatement of asbestos containing materials and bringing the building's structural system into compliance with current practices for seismic design.

The public is encouraged to attend and participate in a scoping meeting on Wednesday, October 2, 2019, from 4:00 p.m. to 6:00 p.m. at:

Laguna Niguel City Hall, 30111 Crown Valley Pkwy, Laguna Niguel, CA 92677, (949) 362-4300

The views and comments of the public are necessary in helping to determine the scope and content of the environmental analysis. Comments must be received by October 21, 2019 and emailed to osmahn.kadri@gsa.gov or sent to:

General Services Administration
Attention: Osmahn Kadri, NEPA Project Manager
50 United Nations Plaza, 3345 Mailbox #9
San Francisco, CA 94102

For more information or if special assistance is needed to attend and participate in the public scoping meeting, please contact Osmahn Kadri, NEPA Project Manager, General Services Administration at 415-522-3617

APPENDIX C: LETTER TO INTERESTED PARTIES



September 20, 2019

Dear Interested Reader,

Please be advised that the General Services Administration (GSA) will be preparing an Environmental Impact Statement (EIS) to analyze the potential impacts from the proposed alternatives to address how to accommodate tenants of the Chet Holifield Federal Building (CHFHB). The CHFHB is owned by GSA and is home to various federal agency tenants, with the United States Citizenship and Immigration Services (USCIS) serving as the largest tenant.

The CHFHB is located in Laguna Niguel, California, between Los Angeles and San Diego. The building is approximately 1 million square feet in size located on an 86.5-acre parcel. An associated 5.5-acre parcel containing a central utility plant for the building is located north of Avila Road. The 92 acres of property is located in a high value real estate suburban area comprised of retail and residential zones and is primarily used for federal office space. The building was originally built in 1970 by the Aerospace and Systems Group of North American Rockwell Corporation. It was never occupied and was transferred to the federal government for use by federal agencies in March of 1974. As a result of the age and current condition of the building, there are a number of issues that must be addressed to continue to use the space in a safe and efficient environment. While there are many issues to be addressed, major concerns include abatement of asbestos containing materials and bringing the building's structural system into compliance with current practices for seismic design.

The EIS will consider two **“action” alternatives** and one **“no action” alternative**. The two **“action” alternatives** are described as follows:

- Alternative 1 would involve construction of a new federal office building within the 86.5-acre parcel, directly adjacent to the existing CHFHB for the USCIS and relocating all other tenants into lease space primarily within the Orange County market. The existing building and the remainder of the property not retained for construction of the USCIS building would be turned over to the GSA Real Property Utilization Disposal Division.
- Alternative 2 would involve relocation of all tenants primarily within Orange County similar to as under Alternative 1, but to also include a new location for USCIS outside of the existing CHFHB property. The existing CHFHB and surrounding government property would be turned over to the GSA Real Property Utilization Disposal Division.

The “no action” alternative is included and analyzed to provide a baseline for comparison with impacts from the Project and also to satisfy federal requirements for analyzing “no action” under the National Environmental Policy Act (NEPA) (40 Code of Federal Regulations [CFR] 1502.14(d)). The “no action” alternative assumes that the current issues with the CHFHB would not be addressed and that operations would continue under current conditions.

A scoping meeting for the EIS will be held on Wednesday, October 2, 2019 from 4 to 6 PM at:

Laguna Niguel City Hall
30111 Crown Valley Pkwy
Laguna Niguel, CA 92677



The meeting will be conducted in an open house format, where project information will be displayed and distributed. The open house format will encourage discussion and information sharing through opportunities for the public to speak one-on-one with representatives of the GSA. Interested parties are encouraged to attend and provide written comments regarding the scope of the EIS. Comments must be received by October 21, 2019 and emailed to osmahn.kadri@gsa.gov or sent to:

General Services Administration
Attention: Osmahn Kadri, NEPA Project Manager
50 United Nations Plaza, 3345 Mailbox #9
San Francisco, CA 94102

For further information, please contact Osmahn Kadri, NEPA Project Manager, General Services Administration at (415) 522-3617. Please also call this number if special assistance is needed to attend and participate in the public scoping meeting.

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APPENDIX D: ADVERTISING ON SOCIAL MEDIA



Laguna Niguel residents are encouraged to attend and participate in the General Services Administration's public scoping meeting regarding the proposed alternatives for the Chet Holifield Federal Building and the upcoming environmental analysis.

This meeting will take place at City Hall on Wednesday, October 2, 2019 from 4:00 to 6:00 P.M. Please see the full notice below for more details.

NOTE: This meeting is not in regards to a plan for the entire site or what the future of the site will be. This meeting is solely about the existing building tenants.

Public Scoping Meeting for Chet Holifield Federal Building Environmental Impact Statement

The General Services Administration (GSA) is beginning preparation of an Environmental Impact Statement (EIS) to analyze the potential impacts from the proposed alternatives to address how to accommodate the tenants of the Chet Holifield Federal Building (CHFB). The CHFB is owned by GSA and is home to various federal agency tenants, with the United States Citizenship and Immigration Services (USCIS) serving as the largest tenant.

The CHFB is located in Laguna Niguel, California, between Los Angeles and San Diego. The building is approximately 1 million square feet in size located on an 86.5-acre parcel. An associated 5.5-acre parcel containing a central utility plant for the building is located north of Avila Road. The 92 acres of property is located in a high value real estate suburban area comprised of retail and residential zones and is primarily used for federal office space. The building was originally built in 1970 by the Aerospace and Systems Group of North American Rockwell Corporation. It was never occupied and was transferred to the federal government for use by federal agencies in March of 1974. As a result of the age and current condition of the building, there are a number of issues that must be addressed to continue to use the space in a safe and efficient environment. While there are many issues to be addressed, major concerns include abatement of asbestos containing materials and bringing the building's structural system into compliance with current practices for seismic design.

The public is encouraged to attend and participate in a scoping meeting on Wednesday, October 2, 2019, from 4:00 p.m. to 6:00 p.m. at:

Laguna Niguel City Hall, 30111 Crown Valley Pkwy, Laguna Niguel, CA 92677, (949) 362-4300

The views and comments of the public are necessary in helping to determine the scope and content of the environmental analysis. Comments must be received by October 21, 2019 and emailed to osmahn.kadri@gsa.gov or sent to:

General Services Administration
Attention: Osmahn Kadri, NEPA Project Manager
50 United Nations Plaza, 3345 Mailbox #9
San Francisco, CA 94102

For more information or if special assistance is needed to attend and participate in the public scoping meeting, please contact Osmahn Kadri, NEPA Project Manager, General Services Administration at 415-522-3617

Public Meeting: Chet Holifield Federal Building

Laguna Niguel residents are encouraged to attend and participate in the General Services Administration's public scoping meeting regarding the proposed alternatives for the Chet Holifield Federal Building and the upcoming environmental analysis. This meeting will take place at City Hall on Wednesday, October 2, 2019

See more...

Public Scoping Meeting for Chet Holifield Federal Building Environmental Impact Statement

The General Services Administration (GSA) is beginning a scoping of an Environmental Impact Statement (EIS) to analyze the potential impacts from the proposed alternatives to either renovate or demolish the historic old Chet Holifield Federal Building (CHFB). The CHFB is owned by the GSA and is being re-evaluated against current needs, with the United States Citizenship and Immigration Services (USCIS) moving to the large structure.

The CHFB is located in Laguna Niguel, California, on Crown Hill Avenue and has 100,000 sq ft of space. The building is approximately 1.1 million sq ft in size located on an 85.5-acre parcel. An attached 1.3-acre parcel containing a creek is also planned for the building. It is located on 10 of York Road. The 17 acres of property is located in a high-value urbanized residential area along part of what is considered a main road and is primarily used for federal office space. The building was originally built in 1970 by the Aerospace and Defense Group of North American Rockwell Corporation. It was never occupied and was considered by the federal government for sale by federal agencies in March 2015. As a result of the age and current condition of the building, there are a number of issues that need to be addressed to ensure the use of the space in a safe and efficient manner. GSA has set many issues to be addressed, major issues include assessment of asbestos-containing materials and mitigating the building's external system components with current practices the modern design.

The public is encouraged to attend and participate in a scoping meeting on Wednesday, October 2, 2019, from 6:00 pm to 8:00 pm at:

Laguna Niguel City Hall, 3011 Crown Hillway, Laguna Niguel, CA 92653 (949) 461-4400

The views and comments of the public are necessary to determine the scope and content of the environmental analysis. Comments can be emailed by October 15, 2019 and should be sent to scoping@gsa.gov or see us at:

General Services Administration
 Attention: Scoping Staff, 9500 Project Manager
 30 United Nations Plaza, 8th Floor
 San Francisco, CA 94103

For more information or special assistance to attend and/or request to be on the public comment mailing, please contact Christine Smith, EIS/EI Project Manager, General Services Administration at (415) 331-3643

27 Sep · Subscribers of City of Laguna Niguel



Thank



Comment



13



23 · 5553 Impressions

Chet Holifield Federal Building

The General Services Administration (GSA), which owns and operates the Chet Holifield Federal Building, is holding a public meeting on Wednesday, October 2 at the Laguna Niguel City Hall to discuss future accommodations of existing building tenants. This meeting is not about a specific plan for the entire site or regarding the future of the site. No details on options under consideration have been shared with the City or public, however the GSA has assured the City that it is their goal to work in partnership with the community. The City will be providing regular updates to the public as more information becomes available.



APPENDIX E: SCOPING MEETING POSTER DISPLAY

WELCOME

GSA

CHET HOLIFIELD FEDERAL BUILDING ENVIRONMENTAL IMPACT STATEMENT PUBLIC SCOPING MEETING



October 2, 2019

**LAGUNA NIGUEL
CITY HALL**

4:00 PM to 6:00 PM

WE WANT YOUR COMMENTS!



In Writing on the comment forms provided at this meeting.



Email comments to osmahn.kadri@gsa.gov

By Mail addressed to:

General Services Administration
Attention: Osmahn Kadri, NEPA Project Manager
50 United Nations Plaza, 3345 Mailbox #9
San Francisco, CA 94102



Public scoping comments must be postmarked or received electronically by October 21, 2019.

PROJECT BACKGROUND

Chet Holifield Federal Building Environmental Impact Statement



The Chet Holifield Federal Building (CHFB) is located in Laguna Niguel, California, between Los Angeles and San Diego, and approximately 4 miles from the Pacific coastline. The building is owned by the General Services Administration (GSA) and is home to various federal agency tenants, with the United States Citizenship and Immigration Services (USCIS) serving as the largest tenant.

The CHFB is approximately 1 million square feet in size and is located on an 86.5-acre parcel. An associated 5.5-acre parcel containing a central utility plant for the building is located north of Avila Road. The 92 acres of property is located in a high value real estate suburban area comprised of retail and residential zones and is primarily used for federal office space. The building was originally built in 1970 by the Aerospace and Systems Group of North American Rockwell Corporation. It was never occupied and was transferred to the federal government for use by federal agencies in March of 1974. As a result of the age and current condition of the building, there are a number of issues that must be addressed to continue to use the space in a safe and efficient environment. While there are many issues to be addressed, major concerns include abatement of asbestos containing materials and bringing the building's structural system in compliance with current practices for seismic design.



Project Location

PROPOSED ALTERNATIVES

Chet Holifield Federal Building Environmental Impact Statement

GSA

The Environmental Impact Statement (EIS) will consider **two “action” alternatives** and one **“no action” alternative**. The two “action” alternatives include:

- **Alternative 1**, which would involve construction of a new federal office building directly adjacent to the existing Chet Holifield Federal Building (CHFEB) for the United States Citizenship and Immigration Services (USCIS) and relocating all other tenants into lease space primarily within the Orange County market. The existing building and the remainder of the property not retained for construction of the USCIS building would be turned over to the General Services Administration (GSA) Real Property Utilization Disposal Division.

- **Alternative 2**, which would involve relocation of all tenants primarily within Orange County similar to as under Alternative 1, but to also include a new location for USCIS outside of the existing CHFEB property. The existing CHFEB and surrounding government property would be turned over to the GSA Real Property Utilization Disposal Division.

The **“no action” alternative** assumes that the current issues with the CHFEB would not be addressed and that operations would continue under current conditions.

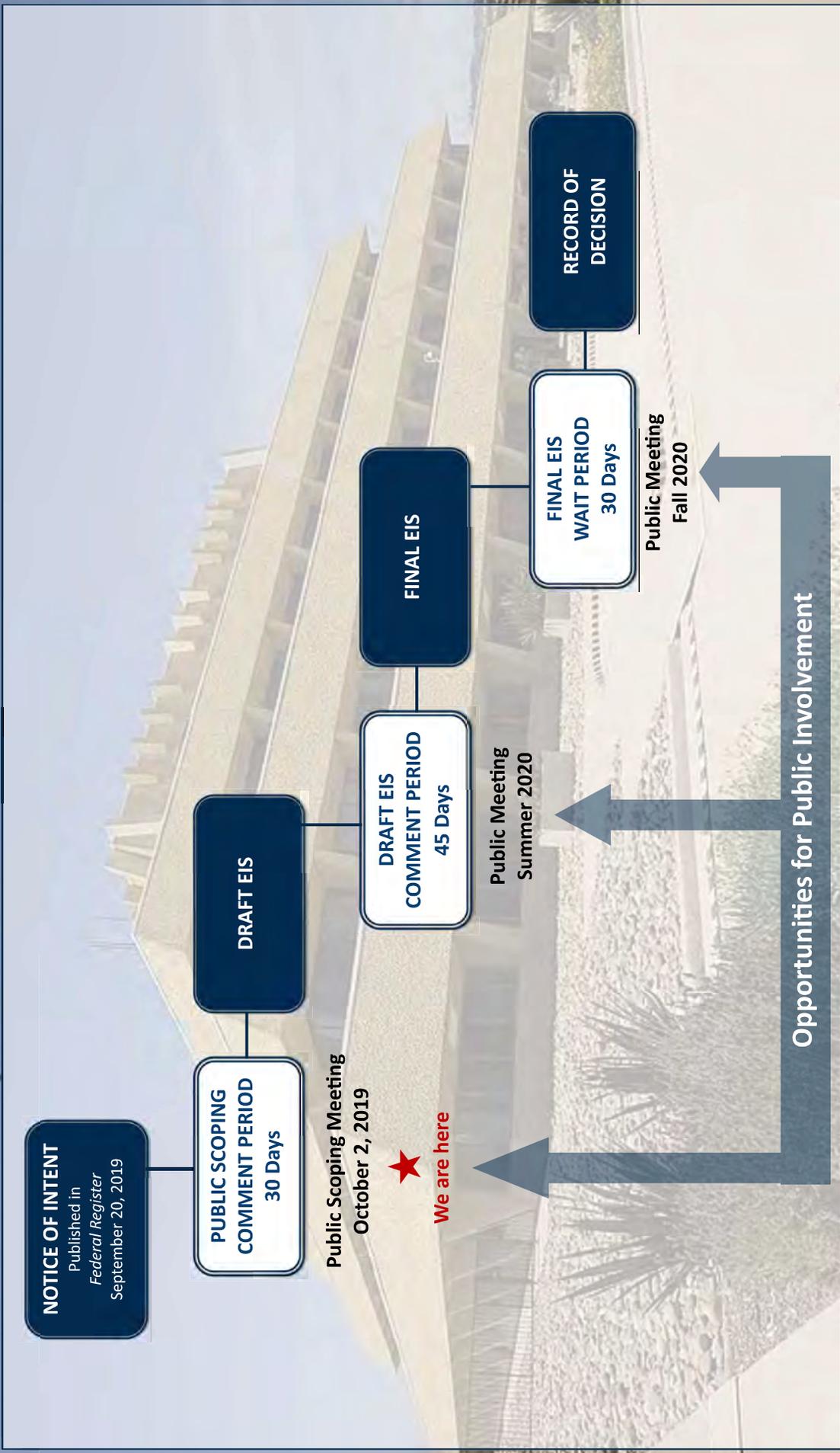


Rendering of New USCIS Building under Alternative 1

NEPA PROCESS

Chet Holifield Federal Building

Environmental Impact Statement



KEY STEPS

Internal Scoping

- . The General Services Administration (GSA) identifies a need to accommodate the long-term office space requirements for the current tenants located at the Chet Holifield Federal Building (CHFB) that would meet applicable building code, accessibility, and security standards.
- . GSA conducts a Feasibility Study to explore viable alternatives to accommodate the CHFB tenants.
- . GSA reviews the proposed project and environmental resources and decides to prepare an Environmental Impact Statement (EIS).

Public Scoping Period

- . GSA publishes a Notice of Intent on September 20, 2019 in the *Federal Register* to prepare an EIS for public review and holds a Public Scoping Meeting to describe the Proposed Action, solicit comments, and listen to community concerns and interests before preparation of the EIS.
- . September 20, 2019, 30-day public scoping period begins, during which the public may submit written and verbal comments on issues that should be considered in the EIS. Public Scoping Period ends October 21, 2019.

Develop Draft EIS

- . Draft EIS is developed to analyze potential impacts to the natural and human environment.
- . Public comments received during the Public Scoping Period are considered during the preparation of the Draft EIS.
- . Required consultations initiated with agencies to comply with laws and regulations (i.e., Endangered Species Act, National Historic Preservation Act, etc.).

Public Comment Period

- . GSA publishes a Notice of Availability in the *Federal Register* and local media informing the public that the Draft EIS is available for public review (Summer 2020).
- . 45-day Public Comment Period which may include a public hearing.
- . Written comments on the contents of the Draft EIS accepted through the U.S. mail, via e-mail, or in person at a public meeting.

Develop Final EIS

- . Complete required consultations.
- . Review, consider, and address, as appropriate, the public comments received.
- . Revise and finalize the EIS.

Final EIS and ROD Issued

- . Final EIS is completed.
- . Prepare a Record of Decision (ROD).
- . 30-day waiting period which may include a public meeting.
- . Written comments on the contents of the Final EIS accepted through the U.S. mail, via e-mail, or in person at a public meeting.
- . After no less than 30 days, sign the ROD.
- . Implement the decision selected in the ROD.

Federal agencies are required under the National Environmental Policy Act (NEPA) to integrate environmental values into planning decision making processes by considering the environmental impacts of proposed actions and reasonable alternatives to those actions through a systematic interdisciplinary approach.

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APPENDIX F: SCOPING COMMENT FORM

APPENDIX G: SCOPING MEETING HANDOUT

Summary

The General Services Administration (GSA) intends to prepare an Environmental Impact Statement (EIS) to analyze the potential impacts from the proposed alternatives to address how to accommodate tenants of the Chet Holifield Federal Building (CHFHB). The CHFHB is owned by GSA and is home to various federal agency tenants, with the United States Citizenship and Immigration Services (USCIS) serving as the largest tenant.

Project Background

The CHFHB is located in Laguna Niguel, California, between Los Angeles and San Diego. The building is approximately 1 million square feet in size and is located on an 86.5-acre parcel. An associated 5.5-acre parcel containing a central utility plant for the building is located north of Avila Road. The 92 acres of property is located in a high value real estate suburban area comprised of retail and residential zones and is primarily used for federal office space. The building was originally built in 1970 by the Aerospace and Systems Group of North American Rockwell Corporation. It was never occupied and was transferred to the federal government for use by federal agencies in March of 1974.

Proposed Alternatives

The EIS will consider two **“action” alternatives** and one **“no action” alternative**. The two **“action” alternatives** are described as follows:

- Alternative 1 would involve construction of a new federal office building within the 86.5-acre parcel, directly adjacent to the existing CHFHB for the USCIS and relocating all other tenants into lease space primarily within the Orange County market. The existing building and the remainder of the property not retained for construction of the USCIS building would be turned over to the GSA Real Property Utilization Disposal Division.
- Alternative 2 would involve relocation of all tenants primarily within Orange County similar to as under Alternative 1, but to also include a new location for USCIS outside of the existing CHFHB property. The existing CHFHB and surrounding government property would be turned over to the GSA Real Property Utilization Disposal Division.

The **“no action” alternative** assumes that the current issues with the CHFHB would not be addressed and that operations would continue under current conditions.





Figure 1. Proposed Project Location and Alternative 1

National Environmental Policy Act (NEPA) Process

We are currently in the Public Scoping Process phase of the NEPA Process. The views and comments of the public are necessary to help determine the scope and content of the environmental analysis. An important objective of scoping is to identify specific elements of the environment that might be affected if the proposal is carried out. Potentially significant impacts raised during scoping are analyzed in detail in the EIS.



Scoping Comments

Scoping comments may be submitted by email or mail and must be received by close of the 30-day public scoping period.

- By email, send to osmahn.kadri@gsa.gov. Please reference the Chet Holifield Federal Building EIS in the subject line.
- By mail, send to:

General Services Administration
Attention: Osmahn Kadri, NEPA Project Manager
50 United Nations Plaza, 3345 Mailbox #9
San Francisco, CA 94102

For further information, please contact Osmahn Kadri, NEPA Project Manager, General Services Administration at (415) 522-3617.

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APPENDIX H: SCOPING MEETING SIGN-IN SHEETS

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PLEASE SIGN-IN

Please print clearly.

NAME	ORGANIZATION	STREET ADDRESS	EMAIL ADDRESS	Would you like to be informed of project developments?
Virginia Quintero	Citizen			<input type="checkbox"/>
Donna Riddell	Resident			<input checked="" type="checkbox"/>
Gregory Reid	Resident			<input checked="" type="checkbox"/>
Marilyn Ratliff	Resident			<input checked="" type="checkbox"/>
ROBERT MONTGOMERY	COMMERCIAL PROPERTY			<input checked="" type="checkbox"/>
Marilyn McCloskey	Resident			<input checked="" type="checkbox"/>
Marcy Holland	Resident			<input checked="" type="checkbox"/>
Cathy Rodarte	Resident			<input checked="" type="checkbox"/>
Janore Saks	Resident			<input checked="" type="checkbox"/>
May Love	Resident			<input checked="" type="checkbox"/>
Tom McNichols	Resident	<input checked="" type="checkbox"/>		

Date:



PLEASE SIGN-IN

Please print clearly.

NAME	ORGANIZATION	STREET ADDRESS	EMAIL ADDRESS	Would you like to be informed of project developments?
Helena DiPanno	Lincoln Club			<input checked="" type="checkbox"/>
Chris Aguiar				<input checked="" type="checkbox"/>
MATT FINE				<input checked="" type="checkbox"/>
ANDY PERREN				<input checked="" type="checkbox"/>
SALLY SPINALE				<input checked="" type="checkbox"/>
Ashli Gold				<input checked="" type="checkbox"/>
Claine Gennawey	City of Laguna Niguel			<input checked="" type="checkbox"/>
LEANN DAVIES	Laguna Niguel			<input type="checkbox"/>
DEREK NUGGINS	RC			<input checked="" type="checkbox"/>
Bob & Cathy Davies	-			<input checked="" type="checkbox"/>
DONNA CLARK		<input checked="" type="checkbox"/>		

Date:



PLEASE SIGN-IN

Please print clearly.

NAME	ORGANIZATION	STREET ADDRESS	EMAIL ADDRESS	Would you like to be informed of project developments?
Fred Naas				<input type="checkbox"/>
Sherry Hutchinson				<input type="checkbox"/>
Leborah News Wood				<input checked="" type="checkbox"/>
Chris Buccola				<input checked="" type="checkbox"/>
Dan Buccola				<input checked="" type="checkbox"/>
Mark Buccola				<input checked="" type="checkbox"/>
Taylor Parkem				<input checked="" type="checkbox"/>
Shauna Achitty				<input checked="" type="checkbox"/>
John Morgan	City of LA			<input type="checkbox"/>
Matt Shannon	Urbanus Group			<input checked="" type="checkbox"/>
Chris Miller				<input checked="" type="checkbox"/>

Date:



PLEASE SIGN-IN

Please print clearly.

NAME	ORGANIZATION	STREET ADDRESS	EMAIL ADDRESS	Would you like to be informed of project developments?
Brian Fisk	Resident			<input checked="" type="checkbox"/>
FRANCES HICKS	KW Realty.			<input checked="" type="checkbox"/>
Omar Dedashay	City of Aliso Viejo			<input checked="" type="checkbox"/>
Mark Mountford	Moulton Niguel Water Dist			<input checked="" type="checkbox"/>
BOB EVANS	VINEYARD COMMUNITY CHURCH			<input checked="" type="checkbox"/>
Mike Hudgins	Vineyard Community Church			<input checked="" type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>

Date:



PLEASE SIGN-IN

Please print clearly.

NAME	ORGANIZATION	STREET ADDRESS	EMAIL ADDRESS	Would you like to be informed of project developments?
BRIAN MEIHAUS	Horowitz Group			<input checked="" type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
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				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>

Date:

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APPENDIX I: INDEX OF COMMENTS BY SOURCE AND DATE

Commenter	Total Comments	Date	Name	Affiliation (if any)	Comment Method
AGENCY					
A1	2	10/2/2019	George Blackburn, CFM, Branch Chief, Floodplain Management and Insurance Branch	Federal Emergency Management Association	Letter
A2	11	12/11/2019	Zac Appleton, Environmental Review Branch	U.S. Environmental Protection Agency	Letter
PUBLIC					
P1	2	10/2/2019	Marilyn McCloskey		Scoping Meeting
P2	1	10/2/2019	Unnamed		Scoping Meeting
P3	1	10/2/2019	Donna Riddell		Scoping Meeting
P4	4	10/9/2019	Christopher Miller		Email
P5	1	11/19/2019	Jean Public		Email
P6	2	11/19/2019	Patricia Martz	California Cultural Resource Preservation Alliance	Email

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APPENDIX B: CONSULTATION AND COORDINATION

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DISTRIBUTION LIST

Notification letters indicating the availability of the DEIS were sent to the following:

State and Federal Agencies

- Advisory Council on Historic Preservation
- California Air Resources Board
- Carlsbad Fish and Wildlife Office
- California Department of Fish and Wildlife, South Coast Region
- Caltrans District 12
- California State Historic Preservation Officer
- Department of Toxic Substances Control, Cypress Regional Office
- Federal Emergency Management Agency, Region IX
- Native American Heritage Commission
- San Diego Water Quality Control Board
- South Coast Air Quality Management District
- State Water Resources Control Board
- U.S. Environmental Protection Agency, Southern California Field Office

Local Government Entities

- City of Laguna Niguel
- City of Aliso Viejo, Planning Department
- City of Dana Point, Community Development Department
- City of Laguna Beach, Community Development Department
- City of Laguna Hills, Community Development Department
- City of Laguna Woods
- City of San Juan Capistrano, Development Services Department
- City of Mission Viejo, Community Development Department
- Hall of Administration, Orange County Executive Office
- OC Development Services, Planning Commission
- Orange County Board of Supervisors
- Orange County Fire Authority
- County of Orange, County Administration South
- Capistrano Unified School District
- Moulton Niguel Water District

Non-Governmental Organizations and Other Entities

- Preserve Orange County
- California Cultural Resource Preservation Alliance, Inc.
- San Diego Gas & Electric

Interested Members of the Public

- Brian Bauer

Letters were also sent to local business addresses as provided by the City of Laguna Niguel.



GSA Pacific Rim Region

December 7, 2015

Ms. Julianne Polanco
State Historic Preservation Officer
Office of Historic Preservation
California Department of Parks and Recreation
1725 23rd Street, Suite 100
Sacramento, CA 95816

Attention: Ed Carroll

Re: Determination of Eligibility for the Chet Holifield Federal Building, 24000 Avila Road,
Laguna Nigel, CA

Dear Ms. Polanco:

The United States General Services Administration (GSA), as part of its responsibilities under Section 106 of the National Historic Preservation Act, has commissioned Heritage Architecture & Planning to complete a Determination of Eligibility for the National Register of Historic Places (NRHP) for the Chet Holifield Federal Building in Laguna Nigel, CA. This determination was prepared in anticipation of a potential undertaking at the building to dispose of a portion of the surface parking lot.

The Chet Holifield Federal Building was designed in 1968 with construction completed in 1971, and was designed by William Pereira & Associates Planning & Architecture. The architect, William L. Pereira was a nationally prominent practitioner of modernist architecture, and has been recognized as a leader of the modernist movement, and is known especially throughout California. The Chet Holifield Federal Building style is extremely rare as there are only seven known ziggurat buildings throughout the nation. There are only two ziggurat style buildings existing within the state of California of which the Chet Holifield Federal Building is the oldest.

GSA has reviewed this draft document and determined that the Chet Holifield FB meets National Register Criterion C due to its rarity of architectural style and association with master architect William L. Pereira. Since it is not yet fifty years old, and due to the rarity of its architectural style, we have determined that it also meets eligibility under Criteria Consideration G and is of exceptional importance.

US General Services Administration
50 United Nations Plaza
San Francisco, CA 94102
www.gsa.gov

We are enclosing a draft copy of this document so we can incorporate any comments you may have. If we do not receive a reply from you within a 30 day period we will assume that you concur with our determination that the Chet Holifield FB is eligible for the NRHP. We ask that the parties cc'd on this letter also reply to us with any comments within that same timeframe. If you have any questions regarding this matter, please contact me at jane.lehman@gsa.gov or (415) 522-3098.

Sincerely,



Jane Lehman
Regional Historic Preservation Officer

JL:jc

Enclosures

CC:

Kirsten Brinker Kulis – Via Email
Advisory Council on Historic Preservation
1100 Pennsylvania Avenue NW, Suite 803
Washington, D.C. 20004

Ms. Cindy Heitzman
Executive Director
California Preservation Foundation
5 Third Street, Suite 424
San Francisco, CA 94103

Mr. Adrian Scott Fine
Director of Advocacy
Los Angeles Conservancy
523 W 6th Street, Suite 826
Los Angeles, CA 90014

Ms. Beth L. Savage – Via Email
Federal Preservation Officer
Center for Historic Buildings
General Services Administration
1800 F Street, NW, Room 3344
Washington, DC 20405

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

1725 23rd Street, Suite 100
SACRAMENTO, CA 95816-7100
(916) 445-7000 Fax: (916) 445-7053
calshpo@parks.ca.gov
www.ohp.parks.ca.gov



December 31, 2015

Reply in Reference To: GSA_2015_1210_001

Jane Lehman
Regional Historic Preservation Officer
U.S. General Services Administration
50 United Nations Plaza, 1 North
San Francisco, CA 94102

Re: Section 106 Consultation for National Register of Historic Places Eligibility Determination for Chet Holifield Federal Building, Laguna Niguel

Dear Ms. Lehman:

For project planning purposes, GSA has evaluated the Chet Holifield Federal Building in Laguna Niguel for National Register of Historic Places (NRHP) eligibility. Designed by William Pereira and Associates the building was constructed in the ziggurat style and completed in 1971. The subject building does not meet the 50 year NRHP age threshold leading GSA to evaluate the building under Criteria Consideration G.

Upon evaluation GSA has concluded the Chet Holifield Federal Building meets Criterion Consideration G requirements under NRHP Criteria C at the statewide level of significance. After reviewing the information provided, SHPO concurs with GSA's eligibility determination. It is my understanding GSA will reevaluate the building when it becomes 50 years of age and submit the documentation to SHPO for review and comment.

Thank you for seeking my comments and considering historic properties as part of your project planning. If you have any questions or concerns, please contact Ed Carroll of my staff at (916) 445-7006 / Ed.Carroll@parks.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Julianne Polanco".

Julianne Polanco
State Historic Preservation Officer

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APPENDIX C: CULTURAL RESOURCES BACKGROUND INFORMATION

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Archaeological Resources

Prehistoric and Historic Context

William J. Wallace (1955) developed a prehistoric chronology for the southern California coastal region that is still widely used today. Wallace's prehistoric sequence includes four periods: Horizon I - Early Man, Horizon II - Milling Stone, Horizon III - Intermediate, and Horizon IV - Late Prehistoric.

The Early Man period dates to ca. 10,000–6000 B.C. Evidence of Early Man period human occupation has been found along the southern California coast and Channel Islands. On San Miguel Island, Daisy Cave clearly establishes the presence of people in the region nearly 12,000 years ago. Present-day Orange and San Diego counties contain several sites dating to 9,000 to 10,000 years ago.

Recent data from Horizon I sites indicate that the economy was a diverse mixture of hunting and gathering, with a major emphasis on aquatic resources in many coastal areas and on Pleistocene lake shores in the Mojave Desert. Although few Clovis-like fluted points have been found in southern California, it is widely believed that the emphasis on hunting may have been greater during Horizon I than in later periods. The earliest well-defined culture in the region is called the San Dieguito tradition, which is marked by sites containing leaf-shaped bifacial projectile points and knives, stemmed or shouldered projectile points, scrapers, engraving tools, and crescents. Subsistence patterns shifted around 6000 B.C., coincident with the gradual desiccation associated with the onset of the Altithermal, a warm and dry period that lasted for about 3,000 years. After 6000 B.C., a greater emphasis was placed on plant foods and small animals.

The Milling Stone horizon (6000–3000 B.C.) is characterized by an ecological adaptation to collecting and the emergence of milling stones (metates, slabs) and hand stones (manos, mullers), which are typically intentionally shaped. Milling stones occur in large numbers for the first time and are even more numerous near the end of this period. As testified by their toolkits and shell middens in coastal sites, people during this period practiced a mixed food procurement strategy. Subsistence patterns varied somewhat as groups became better adapted to their regional or local environments.

Several key coastal sites in southern California characterize the Milling Stone horizon. One such archaeological site is the well-known Irvine site (CA-ORA-64), which has occupation levels dating between ca. 6000 and 4000 B.C. Many of these sites revealed an abundance of stone chopping, scraping, and cutting tools made from locally available raw material. Projectile points, rather large and usually leaf-shaped, and bone tools, including awls, are generally rare. The large points are associated with the spear and probably with the atlatl dart. Items made from shell, including beads, pendants, and abalone dishes, are generally rare. Evidence of weaving or basketry is present at a few sites. The mortar and pestle were also introduced during the Milling Stone horizon.

Characteristic mortuary practices of the Milling Stone horizon include extended and loosely flexed burials, some with red ochre, and few grave goods such as shell beads and milling stones interred beneath cobble or milling stone cairns. "Killed" milling stones, exhibiting holes, may occur in the cairns. Reburials are common in the Los Angeles County area, with north-oriented flexed burials common in Orange and San Diego counties.

Following the Milling Stone horizon, the Intermediate period dates from approximately 3000 B.C. to A.D. 500 and is characterized by a shift toward a hunting and maritime subsistence strategy, along with a wider use of plant foods.

During the Intermediate period, there was a pronounced trend toward greater adaptation to regional or local resources. For example, an increasing variety and abundance of fish, land mammal, and sea mammal remains are found in sites along the California coast during this period. Related chipped stone tools suitable for hunting are more abundant and diversified, and shell fishhooks become part of the tool kit during this period. Larger knives, a variety of flake scrapers, and drill-like implements are common. Projectile points include large side-notched, stemmed, and lanceolate or leaf-shaped forms. Koerper and Drover (1983)

consider Gypsum Cave and Elko series points, which have a wide distribution in the Great Basin and Mojave Desert between ca. 2000 B.C. and A.D. 500, to be diagnostic of this period. Bone tools, including awls, were more numerous than in the preceding period, and the use of asphaltum adhesive was common.

Mortars and pestles became more common during this period, gradually replacing manos and metates as the dominant milling equipment. Hopper mortars and stone bowls, including steatite vessels, appeared in the tool kit at this time as well. This shift appears to correlate with the diversification in subsistence resources. Many archaeologists believe this change in milling stones signals a shift away from the processing and consuming of hard seed resources to the increasing importance of the acorn. It has been argued that mortars and pestles may have been used initially to process roots (e.g., tubers, bulbs, and corms associated with marshland plants), with acorn processing beginning at a later point in prehistory and continuing to European contact.

Characteristic mortuary practices during the Intermediate horizon and Campbell tradition included fully flexed burials, placed facedown or face up, and oriented toward the north or west. Red ochre was common, and abalone shell dishes were infrequent. Interments sometimes occurred beneath cairns or broken artifacts. Shell, bone, and stone ornaments, including charmstones, were more common than in the preceding Encinitas tradition. Some later sites include *Olivella* shell and steatite beads, mortars with flat bases and flaring sides, and a few small points. The broad distribution of steatite from the Channel Islands and obsidian from distant inland regions, among other items, attest to the growth of trade, particularly during the later part of this period. Howard and Raab (1993) have argued that the distribution of *Olivella* grooved rectangle beads marks a unique trade relation between Horizon III inhabitants of the Mojave Desert and those living in the southern Channel Islands.

In the Late Prehistoric period, which lasted from the end of the Intermediate (ca. A.D. 500) until European contact, there was an increase in the use of plant food resources in addition to an increase in land and sea mammal hunting. There was a concomitant increase in the diversity and complexity of material culture during the Late Prehistoric, demonstrated by more classes of artifacts. The recovery of a greater number of small, finely chipped projectile points, usually stemless with convex or concave bases, suggests an increased use of the bow and arrow rather than the atlatl (spear thrower) and dart for hunting. Other items include steatite cooking vessels and containers, the increased presence of smaller bone and shell circular fishhooks, perforated stones, arrow shaft straighteners made of steatite, a variety of bone tools, and personal ornaments made from shell, bone, and stone. There is also an increased use of asphalt for waterproofing and as an adhesive.

By A.D. 1000, fired clay smoking pipes and ceramic vessels began to appear at some sites. The scarcity of pottery in coastal and near-coastal sites implies ceramic technology was not well developed in that area, or that ceramics were obtained by trade with neighboring groups to the south and east. The lack of widespread pottery manufacture is usually attributed to the high quality of tightly woven and watertight basketry that performed some of the same functions as ceramic vessels. Mortuary customs are elaborate and include cremation and interment with abundant grave goods.

The seemingly abrupt changes in material culture, burial practices, and subsistence focus at the beginning of the Late Prehistoric period are thought to be the result of a migration to the coast of peoples from inland desert regions. In addition to the small triangular and side-notched points similar to those found in the desert regions in the Great Basin and Colorado Desert, Colorado River pottery and the introduction of cremation in the archaeological record are diagnostic of the Yuman tradition in the San Diego region. This combination certainly suggests a strong influence from the Colorado Desert region.

In Los Angeles and Orange counties, similar changes (introduction of cremation, pottery, and small triangular projectile points) are considered the result of a Takic migration to the coast from inland desert regions. This Takic tradition was formerly referred to as the "Shoshonean wedge" or "Shoshonean intrusion." Modern Gabrielino/Tongva, Juaneño, and Luiseño in this region are considered the descendants

of the prehistoric Uto-Aztecan, Takic-speaking populations that settled along the California coast during this period, or perhaps somewhat earlier.

Juaneño

The Project is located in an area historically occupied by the Juaneño, lying along the coast between the Gabrielino to the north and the Luiseño to the south, with Juaneño territory stretching from coastal Long Beach on the north to Camp Pendleton to the south, and including all of Orange County as well as parts of western Riverside. Rather than having a distinct language, Juaneño speech was said to be a dialect of Luiseño (Kroeber 1925:636), though the dialectical differences between the Juaneño and Luiseño “did not prevent mutual understanding . . .” White (1963:104). White further posits that although local variations in culture between Juaneño and Luiseño may have existed, it was at the village rather than the tribal level, suggesting only minor differences between the two groups. In fact, Sparkman (1908) and White (1963) have argued that the Juaneño are really a subgroup of the greater Luiseño tribe, with O’Neil (1988:107, 111) also making reference to the Juaneño being a coastal branch of the Luiseño.

The term Juaneño describes those native people who were missionized into Mission San Juan Capistrano and who inhabited the northernmost portion of Camp Pendleton, while Luiseño has been applied to those living within the “ecclesiastical jurisdiction of Mission San Luis Rey . . . [who shared] an ancestral relationship which is evident in their cosmogony, and oral tradition, common language, and reciprocal relationship in ceremonies” (Oxendine 1983:8). Given the similarities between the groups, much of the existing ethnohistoric information about the Juaneño is derived from accounts about the Luiseño (Kroeber 1925; White 1963).

The Gabrielino, Luiseño, and Juaneño shared similar lifeways as hunters-gatherers who used both inland and coastal food resources while leading a semisedentary lifestyle, often living in permanent communities along watercourses and near coastal estuaries. The presence of water, a stable food supply, and some measure of protection from flooding were the most important factors relating to the location of habitation sites. Commonly chosen habitation sites included the transition zone marking the interface between prairies and foothills and sheltered coastal bays and estuaries, rivers, and streams, such as is found in the general area of the Project (McCawley 1996).

Spanish and Mexican Periods

Spanish explorer Juan Rodríguez Cabrillo first encountered California in 1542, claiming it for the King of Spain. More than two centuries later, in 1769, Spain sent Catholic missionaries and Spanish soldiers to colonize California. Don Gaspar de Portolá led the first overland expedition through Orange County that summer. In 1771, Father Junípero Serra founded Mission San Gabriel in what is now Los Angeles County. Five years later, on November 1, 1776, Mission San Juan Capistrano was founded. The two missions laid claim to much of what would become Orange County.

After Mexican independence from Spain in 1821, the process of dismantling of the mission system began to unfold. The 1833 Secularization Act passed by the Mexican Congress ordered half of all mission lands to be transferred to the Native Americans, with the other half to remain in trust and managed by an appointed administrator. These orders were never implemented due to several factors that conspired to prevent the Native Americans from regaining their patrimony. The missions, including the San Gabriel Mission, were secularized by 1835. The Mexican War of the late 1840s ended with the Treaty of Guadalupe Hidalgo, and in 1850, California became a state.

Architectural History Resources

Historical Context¹

In 1959, the Laguna Niguel Corporation was established by Cabot, Cabot, and Forbes of Boston, who made Laguna Niguel one of the first master planned communities in California. Victor Gruen and Associates, an architecture firm known for large-scale shopping malls and planned communities, developed a plan for 7,100 acres. By the mid-1960s, Laguna Niguel was primed as a potential site for North American Aviation's growing Autonetics division. In 1971, Avco Community Developer acquired the Laguna Niguel Plan and initiated development according to the original master plan. By 1989, Laguna Niguel was incorporated as a city (Heritage Architecture 2016:2-2).

The CHFEB was commissioned in reaction to growing government defense contracts fueled by the Cold War, conflicts in Korea and Vietnam, and the aerospace industry. In 1947, the Berlin Airlift marked the start of the Cold War between the United States and the Soviet Union. Defense spending became an important issue as the newly independent Air Force began to lobby for the return to an international capacity for air power, including the design and manufacture of global strategic bombers capable of delivering the atomic bomb anywhere on earth. This call for increased aviation and defense technology spurred American firms to develop and incorporate into their designs the technological advances that came out of World War II.

As World War II gave way to the Cold War, other technological developments grew from the aviation industry; aviation led to missiles, and missiles eventually led to aerospace. Facilitating the creation of these new technologies was the close relationship that developed between the aerospace and defense manufacturers and the United States government, which had the resources and capacity to fund large multi-year projects. The Department of Defense awarded one quarter of all of its contracts to California in the 1950s. During this period, 15 of the 25 largest aerospace companies in the United States were based in Southern California. Companies such as North American, Douglas, Lockheed, and Northrop developed manufacturing campuses throughout Los Angeles and Orange County. These California companies experienced a 140 percent increase in employment in the aircraft industry during the Korean War as the 88,400 jobs of 1950 grew to 213,000 by 1953.

In August 1957, the United States lost its sense of invulnerability to nuclear attack when the Soviet Union successfully tested the world's first intercontinental ballistic missile. To counter, the United States accelerated development of a protective fleet of land-based missiles. That same year, the Soviet Union launched a man-made satellite, Sputnik. With this launching, the transition to the aerospace industry began, accounting for more than 5.7 percent of all manufacturing jobs in the United States. By 1963, 70,000 defense research scientists and engineers resided in Southern California, mostly in suburban areas and newly developed master planned communities, such as Irvine and Laguna Niguel in Orange County (Heritage Architecture 2016:2-1).

Chet Holifield Federal Building

At the same time Laguna Niguel was being established as a master-planned community in 1959, Los Angeles-based North American Aviation began moving its expanding Autonetics division to Anaheim. The company was in need of larger facilities to continue to meet the industry's demanding need. As early as 1966, the company chose the Laguna Niguel area because of its isolation and as a secured location for its Data System Division. The following year, North American Aviation merged with Rockwell Standard to become the North American Rockwell Corporation, which subsequently became known as Rockwell.

The newly formed Rockwell purchased 1,340 acres from the Laguna Niguel Corporation and the Moulton Ranch and hired William Pereira & Associates Planning & Architecture to design the building. The seven-

¹ The historical context included in this report is drawn and excerpted from Heritage Architecture (2016) and ARG (2019).

story building was designed to resemble an ancient Babylonian temple tower called a Ziggurat. The nearly one-million-square-foot building was to employ 7,500 workers and to be the world's largest electronics manufacturing plant of its time and the largest building in Orange County.

In 1968, an \$18.5 million contract was awarded to Huber, Hunt, and Nichols, Inc., general contractors, and construction began on the facility. Rockwell planned to use the building's lower floors for electronics manufacturing and assembly, the middle floors for engineering, and the top floors for management offices. The facility was to be part of the Laguna Niguel planned community that included residences and other industrial buildings. However, when construction was completed in 1971, the aerospace industry hit a downturn, with both the space program and the Vietnam War ramping down. Plans for the plant were changed, and eventually Rockwell abandoned the use of the site. For several years the building remained unoccupied.

Unable to sell the building, Rockwell contacted the GSA regional office in San Francisco in 1971 to offer it in exchange for government-owned defense plants at El Segundo and Canoga Park, California. The trade was made in March 1974. Since that time, GSA has occupied the building. In 1978, the building was renamed in honor of former U.S. Congressman Chester (Chet) Earl Holifield. By 1986, the building was 63 percent occupied. GSA submitted a prospectus to Congress on June 2, 1986, to complete renovation of the building for continued long-term occupancy (Heritage Architecture 2016:2-2 to 2-3).

Architectural History Resources in APE

The CHFb is the only historic property in the APE. It has previously been determined individually for listing in the NRHP at the local level of significance under Criterion C, as an excellent example of a Modern/Brutalist ziggurat building designed by master architect William L. Pereira. The landscaping, including wide expanses of parking, was designed in concert with the design of the building and constructed as part of the same project.

Architectural Description

Main Building

Exterior: The main character-defining features of the building, including the massing, stepped ziggurat shape, linear fenestration, and pebble-textured pre-cast concrete cladding, remain intact. The building is painted a pale ochre color. Early photographs of the building indicate that it was originally gray, possibly unfinished concrete.

The CHFb has a concrete structural system with cast-in-place concrete columns on a 30-foot structural grid and a "spancrete" pre-cast concrete floor system at each level. The floor system below the fourth-floor traffic deck on the north side of the building and at the upper roof is more substantial to accommodate the additional structural loads associated with vehicular traffic and parking. The structural deck in these areas consists of a concrete deck with 2-foot deep pan joists. The exposed concrete columns of the building were originally labeled in accordance with the structural grid noted on the 1968 construction drawings. The notation is still visible on many of the existing columns. There is no evidence of any significant changes to the original concrete structural systems.

The roofs of the building are generally flat and finished with composition roofing. The upper roof was originally used as a helipad. Mechanical and communications equipment have been added to the upper roof, and the helipad has been moved to an adjacent area on the site. Textured fiberglass fins have been added to help screen some of the equipment. Solar panels have also been added on the lower roofs at the south side of the building.

The exterior window system appears to be original, consisting of fixed-pane dark bronze aluminum windows with a dark coating on the glass. Exterior doors generally consist of dark bronze-colored aluminum framed doors with glass lights that match the dark coating of the windows.

Interior: The interior of the building is generally occupied by private office suites housing various federal agencies. There are relatively few significant character-defining interior spaces. The original Main Lobby located on the north end of the fourth floor is the most significant interior space in the building. The fourth-floor lobby features a decorative wood ceiling treatment and wood wall paneling. Other important interior spaces include the elevator lobbies and the main corridors.

According to the original drawings, the main office areas in the building were originally large open areas without interior walls and partitions in most areas of the building. In many spaces, walls have been added to subdivide the spaces into smaller office suites and private offices. The additional walls are evident because the ceiling grid does not line up with the walls. The original interior finishes, such as flooring and interior paint, have been replaced several times to facilitate continued use of the building for offices. Original finishes have been largely replaced. There are two sets of escalators, which connect the main north/south corridors from the underfloor to the third floor.

One of the few original decorative interior features in the building is the wood ceiling treatment located in primary interior spaces such as the Main Lobby on the fourth floor, elevator lobbies on all levels, above the escalators, and at the recessed entry on the south side of the underfloor. The decorative ceiling finish includes suspended, evenly spaced, clear-finished wood boards.

The CHFB has previously experienced exterior and interior alterations to the building, as well as alterations to the site. However, most of the alterations were limited to the interior, which was primarily utilitarian and had a minimum number of character-defining features, as described below. Distinctive finishes and character-defining features like wood slat ceilings were limited to public spaces like the main lobby and elevator/escalator lobbies and remain largely intact. Thus, the original design intent is uncompromised (ARG 2019:43).

Site

The site as a whole has experienced few changes since its construction; it was the first major development in this area of Laguna Niguel and has seen commercial and residential areas expand around it over time. Between 1981 and 1994, Alicia Parkway (at the west side of the property) was realigned, cutting off the southwest portion of the parcel from the rest of the property. Sometime in the 2000s-2010s, the original freestanding pole light fixtures in the parcel's inner parking lots were replaced (ARG 2019:44).

Landscaping

The existing landscape contributes to the overall significance of the site, although it is a secondary feature that is largely overshadowed by the massive building. Most of the primary site features on the south, east, and west sides of the building such as general topography, pedestrian paving, vehicular paving patterns, landscape berms, curbs, planter locations, and mature trees around the entire perimeter appear to be original.

The original 1968 drawings indicate a double row of multi-trunk European Olive trees planted in pyramidal berms flanking the front entry drive. The drawings also show pre-cast concrete planters at the perimeter of the parking deck. The planters have been removed, and the olive trees have been replaced with shrubs. Additionally, shrubs and annual flowering plants have been added in the original lawn area in the center. However, the general layout of the parking area remains unchanged, including the vehicle access roads, sidewalks, curbs, and planting areas. The north entry and parking deck were the original main entrance to the site. Although the main public entrance has been moved and the parking area is no longer used, this area continues to contribute to the overall historical character of the building.

Late Modern Architecture

Late Modernism is an umbrella term for several architectural styles that emerged after World War II in response to earlier modes of Modernism. Late Modern buildings generally favored sculptural forms over the restrained aesthetic of its predecessors. Brutalism, as expressed in the CHFB, is a subset of Late Modernism. Practitioners of Brutalist architecture used concrete both structurally and aesthetically to create bold, monolithic forms that dominated their environments – the antithesis of other post-World War II Modern styles that favored light, transparent qualities and buildings that blended seamlessly with their surroundings. Brutalism proliferated in the 1960s and early 1970s and was particularly popular in public architecture and educational institutions nationwide.

Architect: William Pereira & Associates

William L. Pereira was born in Chicago in 1909. At a young age, he honed his creative skills as a draftsman, architect's assistant, painter, and illustrator. After graduating from the University of Illinois School of Architecture in 1931, he worked for the firm of Holabird and Root and later designed movie theaters for the chain of Balaban & Katz. This eventually led to a job designing a Hollywood studio for Paramount Pictures, and for a time, a variety of non-architecture projects in the film industry. Pereira shared an Oscar award for his work on special effects on Cecil B. DeMille's film, "Reap the Wild Wind." After World War II, Pereira became a professor at the University of Southern California's School of Architecture. In 1951, Pereira returned to architecture practice and formed a partnership with architect Charles Luckman. The partnership proved extremely successful, and together the duo created some of Los Angeles's most notable landmarks, including CBS Television City (1952), Los Angeles Center Studios (1958), and the master plan for the Theme Building at LAX (1961).

When the partnership dissolved, and Pereira formed his own practice, William Pereira & Associates. Often referred to as the architect of the "Los Angeles look," Pereira's major commissions include Marineland of the Pacific (1954), the Metropolitan Water District campus (1963), the Los Angeles County Museum of Art (1965), the Mutual Benefit Life Plaza (1969), and the Geisel Library at UC San Diego (1970). Pereira also became a leading figure of master planning, as seen in his designs for the 1962 masterplan for the University of California Irvine campus, the 1970s design for the University of Pepperdine, and the 1960 and 1966 campus plans (and numerous buildings) for the University of Southern California. His success earned him the cover of Time magazine in 1963. Pereira died in 1985.

Landscape Architect: Donald Brinkerhoff

Donald Brinkerhoff graduated from Cal Poly Pomona with a Bachelor of Science in Horticulture in 1952. In 1958, he founded the landscape architecture firm Lifescapes International with his wife, Barbara Brinkerhoff, in Newport Beach, California. In 1973, the firm won awards from the American Society of Landscape Architects, the American Association of Nurserymen, and the National Landscape Association. The firm is perhaps best known for its work along the Las Vegas Strip between the late 1980s and 2000s, which included landscape designs for the Mirage, the Bellagio, the Venetian, the Palazzo, and the Wynn. Over the course of his career, Brinkerhoff pioneered several advancements in the field of landscape architecture, including cobblestone-patterned concrete paving. He is also credited with originating the terms "softscape" and "hardscape" in distinguishing plant materials from architectural landscape elements. In the early 1990s, Brinkerhoff received the American Society of Landscape Architects' Fellows designation, the highest honor bestowed by the ASLA.

Figures



Figure C-1. The south and east façades, view toward the northwest.

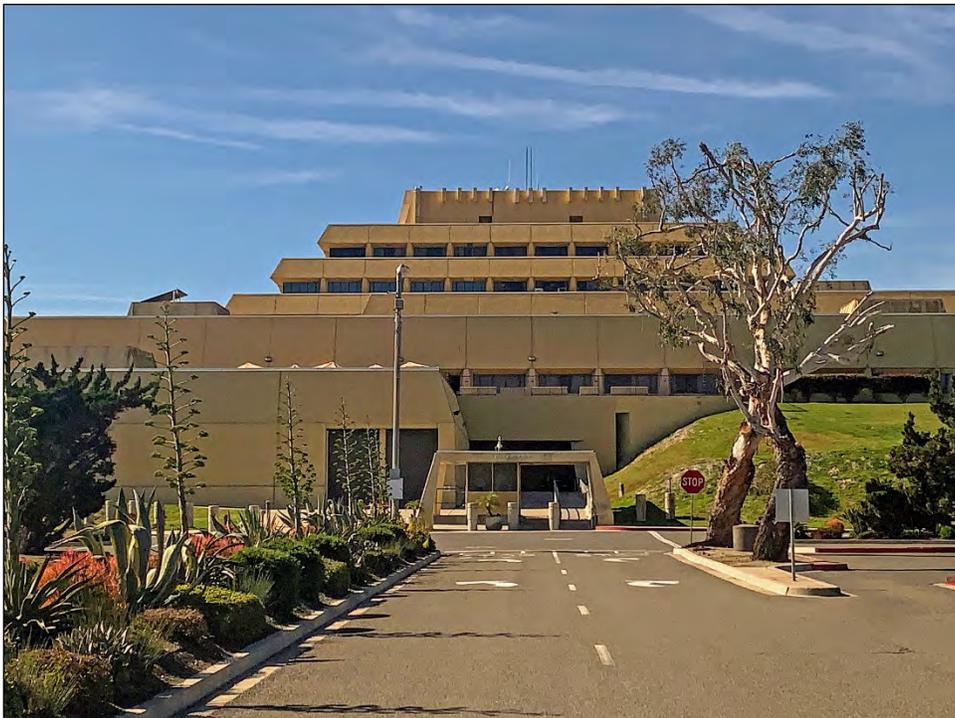


Figure C-2. The east façade, view toward the west.



Figure C-3. The east and north façades, including shallow steps, view toward the southwest.



Figure C-4. The north façade, view toward the south.



Figure C-5. View toward the north from the penthouse.



Figure C-6. The west and south façades, view toward the northeast.



Figure C-7. The west façade and O&M building, view toward the east.



Figure C-8. The west façade, distant view toward the east.



Figure C-9. Distant view of the south façade, looking toward the north from the intersection of Aliso Creek Road and Dorine Road.



Figure C-10. The south façade, view from the landscaped parkway.



Figure C-11. Distant view of the south façade from El Lazo.



Figure C-12. Distant view of the west façade, looking toward the east.



Figure C-13. The west and south façades, distant view looking toward the northeast.



Figure C-14. View toward the south from the penthouse.



Figure C-15. Reservoir tank and landscaping at northwest edge of property, view toward the northeast.



Figure C-16. Detail of patio outside of cafeteria on second floor, view toward the south.



Figure C-17. Original main lobby on fourth floor, view toward the north.



Figure C-18. Typical window configuration, view toward the northwest.

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APPENDIX D: CHFB DETERMINATION OF ELIGIBILITY

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CHET HOLIFIELD FEDERAL BUILDING

LAGUNA NIGUEL, CALIFORNIA

Determination of Eligibility



Prepared for
U.S. General Services Administration

50 United Nations Plaza
San Francisco, CA 94102

Prepared by
Heritage Architecture & Planning

625 Broadway, Suite 800
San Diego, California 92101

January 29, 2016

SECTION I - INTRODUCTION

A. Purpose of the Report

The Chet Holifield Federal Building located at 24000 Avila Road in Laguna Niguel, California houses various Federal agencies. The 1,003,041 square foot, seven-story building sits on a 92-acre landscaped site. Commissioned by the Rockwell Corporation, the complex was constructed in 1968-1971 and designed by William L. Pereira & Associates. The Modernist complex exhibits a stepped pyramidal and Brutalist style influence in its geometric design.

The purpose of this report is to evaluate the eligibility of the Chet Holifield Federal Building for listing in the National Register of Historic Places. This determination will allow the General Services Administration (GSA) to appropriately address any future alterations and renovations to the site and buildings while extending the useful life of the complex.

The 1966 National Historic Preservation Act under Section 110, requires the GSA to identify, evaluate, and nominate properties under its jurisdiction that qualify for listing in the National Register of Historic Places. It is GSA's policy to identify potentially eligible properties, apply the criteria, and make a preliminary determination. Consultation with the State Historic Preservation Officer is required to make a formal determination. GSA commissioned this report to fulfill its Section 110 obligation for this property.

B. Methodology

A review of information provided by GSA and archival and historical research was conducted by Heritage Architecture & Planning (Heritage). The on-site evaluation was conducted on September 23, 2014 by Project Architect Carmen Pauli and Historian Eileen Magno of Heritage Architecture & Planning. The Laguna Niguel Historical Society, the County of Orange, the University of Southern California, and the University of California Irvine Library as well as online sources provided necessary background information. Heritage then applied the criteria for evaluation for the National Register of Historic Places including Criteria Consideration G as the property is not over 50 years old.

C. Project Personnel

The primary investigators and review staff from Heritage Architecture & Planning are Carmen Pauli, Project Architect, Eileen Magno, Historian/Architectural Historian, and Brian S. Rickling, AIA, Principal Architect. All staff members meet or exceed *The Secretary of the Interior's Qualification Standards* as published in the Code of Federal Regulations, 36 CFR Part 61.¹

¹ Heritage Architecture & Planning staff members are qualified under the *Secretary of the Interior's Qualification Standards*. Professional qualifications established by the *Secretary of the Interior's Standards and Guidelines for Archaeological and Historic Preservation* have been developed to assist State, Federal, and Local agencies, and other in identifying qualified professionals under the disciplines of history, archaeology, architectural history, and historic architecture.

CHET HOLIFIELD FEDERAL BUILDING

January 29, 2016

Determination of Eligibility – National Register of Historic Places

Page 1-2

Section I – Introduction

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SECTION II – HISTORY OVERVIEW

The Chet Holifield Federal Building was commissioned in reaction to growing government defense contracts fueled by the Cold War, conflicts in Korea and Vietnam, and the aerospace industry. In 1947, the Berlin Airlift marked the start of Cold War between the United States and the Soviet Union, a symbolic conflict in which perceptions of aviation played a key role. Defense spending loomed on the horizon as the newly independent Air Force began to lobby for the return of an international capacity for air power, including the design, manufacture, and serving of global strategic bombers capable of delivering the atomic bomb anywhere on the planet.¹ This call for increased aviation and defense technology spurred American firms to develop and incorporate into their designs the technological advances triggered from World War II.²

As World War II gave way to the Cold War, other technological developments grew from the aviation industry; aviation led to missiles, and missiles eventually led to aerospace. Facilitating the creation of these new technologies was the close relationship that developed between the aerospace and defense manufacturers and the United States government, which had the resources and capacity to fund research and development budgets for large multi-year projects.³ The Department of Defense awarded one-quarter of all of its contracts to California in the 1950s. During this period, 15 of the 25 largest aerospace companies in the United States were based in Southern California.⁴ Companies such as North American, Douglas, Lockheed, and Northrop developed manufacturing campuses throughout Los Angeles and its adjacent hinterland, Orange County. These California companies experienced a 140 percent increase in employment in the aircraft industry during the Korean War as the 88,400 jobs of 1950 became the 213,000 of 1953.

In August 1957, the United States lost its sense of invulnerability to nuclear attack when the Soviet Union successfully tested the world's first intercontinental ballistic missile.⁵ To counter, the United States accelerated development of a protective fleet of land-based missiles.⁶ That same year in October 1957, the Soviet Union launched a man-made satellite, *Sputnik*. With this launching, the transition to aerospace industry began and accounted for more than 5.7 percent of all manufacturing jobs in the United States.

By 1959, national defense spending increased by 246 percent, reaching a staggering sum of \$228 billion.⁷ At this time, California's defense industry amounted to 40 percent of all defense contracts for manufacturing and research nationwide and had a labor force of six million. Thus, nearly one out of every fifteen working Californians was being supported by the Cold War.⁸ By 1963, seventy thousand defense research scientist and/or engineer, who were technically trained and proficient, resided in

¹ Kevin Starr, *Golden Dreams: California in an Age of Abundance 1950-1963*. (New York: Oxford University Press, 2009), p. 219.

² "The History of the Aerospace Industry." <http://eh.net/encyclopedia/the-history-of-the-aerospace-industry>. Accessed 11/3/2014.

³ Ingrad Clausen & Edward A. Miller, "Intelligence Revolution 1960: Retrieving the Corona Imagery that Helped Win the Cold War." (Chantilly, VA: National Reconnaissance Office, 2012).

⁴ Los Angeles County Economic Development Corporation, "The Aerospace Industry in Southern California." (August 2012).

⁵ Clausen, p. 3.

⁶ Boeing, "Honoring the Legacy of Autonetics: Anaheim Commemorative Monument Dedication." n.d.

⁷ Starr, p. 219. Department of Defense awarded \$50 billion in contracts to California, twice the amount received by any other state.

⁸ Starr, p. 227.

Southern California. They lived in suburban areas and newly developed master planned communities, such as Irvine and Laguna Niguel in Orange County.⁹

Laguna Niguel

Growth and development of communities in areas such as Orange County came at a slower pace than their neighbor Los Angeles. Up until the 1950s, agriculture remained the most important part of Orange County's economy. It was not until the 1960s that South Orange County began to grow with the development of master planned communities including Laguna Niguel, Irvine, and Mission Viejo. Many of these planned communities provided much needed housing for the populating defense workers. These workers travelled by automobile through freeways to their "Cold War campuses" where they tackled cutting-edge missile engineering and/or deployment.

Originally part of the Rancho Niguel, the city of Laguna Niguel was first inhabited by the Juaneño and the Gabrielino Indians. The area that is now Laguna Niguel would eventually be under Spanish control by the mid-1700s. These conquered lands were deeded to the Catholic Church, and later the King of Spain awarded land grants to various individuals. The Mexican government eventually came into possession of large parcels of land in the area and in 1842, the Mexican Governor of California granted Juan Avila 13,316 acres, part of present day Laguna Niguel. Avila retained the land until 1865, when a severe drought killed off most of his cattle.¹⁰ In 1895, Lewis Moulton of the Moulton Company purchased Rancho Niguel along with significant other portions of the surrounding area from farmers who were hard-pressed due to the local drought in the area. The Moulton Company would eventually control over 19,000 acres of local ranch land.

In 1959, the Laguna Niguel Corporation was established by Cabot, Cabot, and Forbes of Boston, making Laguna Niguel one of the first master planned communities in California. Victor Gruen and Associates, an Austrian architect, developed a community plan for 7,100 acres. By 1961, land sales commenced in the Monarch Bay and Laguna Terrace subdivisions and by the mid-1960s, Laguna Niguel was primed as a potential site for North American Aviation's growing Autonetics division. In 1971, Avco Community Developer acquired the Laguna Niguel Plan and initiated development as set forth in the original master plan. By 1989, Laguna Niguel became the 29th city incorporated with Orange County.¹¹

Building History

At the same time Laguna Niguel was being established as a master planned community in 1959, the Los Angeles-based North American Aviation began moving its expanding Autonetics division to Anaheim.¹² Autonetics history and growth coincided with that of the missile and space age in the mid-20th century. At its peak in the 1960s, the Autonetics workforce numbered nearly 36,000 men and women in the

⁹ Starr, p. 222.

¹⁰ "History and Statistics: About the City of Laguna Niguel." www.cityoflagunaniguel.org/index.aspx?nid=388 Accessed November 12, 2014.

¹¹ Ibid.

¹² Boeing, "Honoring the Legacy of Autonetics: Anaheim Commemorative Monument Dedication." Autonetics would be partially responsible for the development of the Minuteman missile contributing to its navigation and flight control hardware and software. Autonetics ultimately supplied more than 3,000 inertial guidance and control systems for the Minuteman I and its successors, the II and III.

CHET HOLIFIELD FEDERAL BUILDING

Anaheim site.¹³ The company was in need of larger facilities to continue to meet the industry's demanding need. As early as 1966, the company chose the Laguna Niguel area because of its isolation and as a secured location for its Autonetics' Data System Division. The following year, North American Aviation merged with Rockwell Standard to become the North American Rockwell Corporation; it subsequently became known as Rockwell.

The newly formed Rockwell then purchased 1,340 acres from the Laguna Niguel Corporation and the Moulton Ranch and hired William Pereira & Associates Planning & Architecture to design the building which would service the enormous demands of the aerospace industry and the Vietnam conflict. The seven-story structure was designed to resemble an ancient Babylonian temple tower called a "Ziggurat." Its nearly one million square foot building was to employ 7,500 workers. It was to be the world's largest electronics manufacturing plant of its time and the largest building in Orange County.

In 1968, an \$18.5 million contract was awarded to Huber, Hunt, and Nichols, Inc., general contractors, and construction began immediately.¹⁴ Rockwell planned to use the building's lower floors for electronics manufacturing and assembly, the middle floors for engineering, and the top floors for management offices. The facility was to be part of the planned community including residences and other industrial buildings. However, by 1971, when construction was complete, the aerospace industry hit a downturn with both the space program and the Vietnam War ramping down.¹⁵ Plans for the plant were changed and eventually Rockwell abandoned the use of the site.¹⁶ For several years the building remained unoccupied.¹⁷

Unable to sell the building, Rockwell contacted the U.S. General Services Administration (GSA) regional officials in San Francisco in 1971 to determine whether the government was interested in exchanging the building for government-owned defense plants at El Segundo and Canoga Park, California, and certain machinery and equipment located in Los Angeles. Negotiations followed and the trade was made in March 1974.¹⁸ Since that time, GSA has occupied the building.¹⁹

In 1978, the building was renamed in honor of former Congressman Chester Earl Holifield. Also referred to as Chet Holifield, the former Representative was first elected to the House in 1942 and went on to serve 15 more terms. He represented the 78th district in Los Angeles County.²⁰ Mr. Holifield specialized in atomic energy matters and was influential in legislation enabling development of military and peacetime nuclear programs. He led a successful effort stopping plans to put the military in sole

¹³ Ibid. From 1958-1970, Autonetics designed and produced more than 3,000 radar and fire control sensors to give fighter-bomber aircraft a precision all-weather weapons delivery capability. These sensors gave aircrafts the capability to enter enemy territory undetected, release their payload, and return to base.

¹⁴ "Gigantic Building to Go Up." *Corona Daily Independent*. November 8, 1968.

¹⁵ "Unemployment Shocks Orange County: Jobless Pay Lines Swollen." *Star News*, November 7, 1970. Recession due to slowdown in U.S. defense spending spurred an increase in the unemployment rate beginning in the 1970s. By November 1970, Rockwell, the largest employer in Orange County, laid off approximately 350 employees.

¹⁶ The Autonetics Division remained in their Anaheim facility. From the early 1970s until the 1990s, 55% of all major components used on the satellites were designed, built, and tested at the Anaheim site.

¹⁷ "In Laguna Niguel \$25-million Rockwell Plant Empty for 3 Years." *Press Telegram*. September 28, 1973.

¹⁸ "Ziggurat." *Press Telegram*. February 11, 1976.

¹⁹ John Hardy, "Laguna Niguel's Seven Tiered Ziggurat to House 'Precious' National Documents." *Santa Ana Register*. May 1, 1974. The National Archives were located within the building.

²⁰ "Chester Holifield, 91, Congressman for 32 Years." *New York Times*, February 9, 1995.

control of atomic energy, and in 1946, he persuaded Congress to pass legislation creating the civilian Atomic Energy Commission.²¹ He voluntarily retired in 1974 after 42 years of public service.²²

By 1984, 29 percent of the building was occupied by various Federal agencies. At that time GSA attempted to sell it, but was unsuccessful. By 1986, the building was 63 percent occupied. GSA submitted a prospectus to Congress on June 2, 1986 to complete renovation of the Holifield Building for continued long-term occupancy.²³

Original Project Team

Architect:	William Pereira & Associates Planning & Architecture
Structural Engineers:	Brandow & Johnston
Mechanical/Electrical Engineers:	Budlong & Associates
Civil Engineer:	Shuirman-Simpson
Landscape Architect:	Donald Brinkerhoff Associates
General Contractor:	Huber, Hunt, and Nichols, Inc.

*William Pereira & Associates Planning & Architecture*²⁴

William Leonard Pereira (April 25, 1909-November 13, 1989) graduated from the University of Illinois' School of Architecture, and began his career in his home town of Chicago. His earliest architectural experience was helping to draft the master plan for the 1933 "A Century of Progress." Chicago World's Fair. With his brother, Hal, he designed the Esquire Theater, considered one of Chicago's best examples of Art Deco.

In the 1930s Pereira and his brother moved to Los Angeles. Working as a solo architect, he designed the first buildings for the Motion Picture Country House in Woodland Hills, CA (1942). After a short stint working in Hollywood as an art director and occasional producer, he continued his architecture career first as a professor of architecture at the University of Southern California (USC) and then formed a partnership with Charles Luckman in 1950. One of their most well-known buildings in their nine year partnership was the Theme Building at Los Angeles International Airport (in collaboration with Paul Williams and Welton Becket). They parted in 1959 and Pereira formed his third and final company, William L. Pereira and Associates. In the 1960s and 70s he and his team completed over 250 projects.

By the time of his death, Pereira had over 400 projects to his name. His buildings often had a unique style, taking on unusual forms such as pyramids and ziggurats and generally projected a grand presence through their towering scale and heavy appearance. Among the noted building and planning projects completed in California include the CBS Television City (1953), University of Southern California Master Plan (1960), Irvine Ranch Master Plan (1961), University of California San Diego Central/Geisel Library (1965), the Transamerica Corporate Headquarters Tower (1973), and the LAX Master Plan

²¹ Ibid.

²² "Former Congressman Chet Holifield Dies at 91." *Los Angeles Times*. February 8, 1995.

²³ On June 10, 1986, attorneys for a real estate firm wrote to GSA expressing interest in submitting an unsolicited proposal to purchase the Holifield Building for \$60 million. The real estate firm intended to lease the building to an aircraft company. GSA replied that with the planned renovations, the occupancy level would be at 71 percent, and that would be in the best interest of the government to retain the building.

²⁴ "William Pereira." *Modernsandiego.com*. Accessed 10/10/2014.

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(1967).²⁵ William Pereira was one of the few architects recognized on the cover of *Time Magazine*. His stylish and yet efficient architecture had a tremendous impact on California from the 1950s through the 1980s.

*Donald Brinkerhoff Associates*²⁶

Donald Brinkerhoff graduated from CalPoly San Luis Obispo in 1952 and is a distinguished recipient of the College of Fellows from the American Society of Landscape Architects for his outstanding body of work and his overall contributions to the profession of landscape architecture. He is noted for originating the terms “softscape” and “hardscape” to more easily distinguish plant materials from pools, walkways, and walls. With over 50 years of experience, Mr. Brinkerhoff continues to design today through his firm Lifescapes International, Inc.

*Huber, Hunt & Nichols*²⁷

Founded 1944 in Indianapolis, Indiana by Paul Hunt, Arber Huber, and Harry Nichols, the general contractor was a privately-held organization and known as Huber, Hunt & Nichols at that time. Huber and Nichols left the company shortly after its founding and Paul Hunt carried on as sole owner. The cornerstone of Hunt’s founding began during World War II with industrial/manufacturing facilities.

Huber, Hunt & Nichols formed its construction management department in 1960 in response to increasing involvement of construction technology and know-how during building design. During the 1960s, Hunt continued repeat business with the Big Three: General Motors, Chrysler Corporation, and Ford Motor Company. They also completed the company’s first high-rise building—Indianapolis City-County Building—and experienced growth in the higher education, healthcare, government, and corporate office building market sectors. By 2000, Huber, Hunt & Nichols became known as Hunt Construction Group.

²⁵ James Steele, ed. *William Pereira*. (Los Angeles: Architectural Guild Press, 2002), 140-143. The Geisel/Central Library was commissioned in 1957 with the firm Pereira and Luckman by the Regents of the University of California.

²⁶ Lifescapes International, Inc. “History.” <http://lifescapesintl.com/about>. Accessed 1/26/2016.

²⁷ Hunt Construction Group. “Timeline/History.” <http://huntconstructiongroup.com/about/history>. Accessed 2/23/2014.

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SECTION III - DESCRIPTION

The Chet Holifield Federal Building was designed in 1968 by William Pereira & Associates Planning & Architecture. The building is characterized by its horizontal massing, ziggurat form, sloped walls, and textured pre-cast concrete cladding. The building is situated on a slightly sloped site which allows portions of the lower floors to be recessed into the hillside, accentuating the horizontality of the design.

Construction Chronology

- July 29, 1968 Date on the original Construction Drawings. William Pereira & Associates Planning & Architecture designed the building for Autonetics, a division of the North American Rockwell Corporation.
- 1971 Construction of the building is completed.
- 1971-1974 Although the building is completed, it remained unoccupied.
- 1974 The North American Rockwell Corporation negotiates a deal with the U.S. General Services Administration to trade the building for surplus federal government facilities of equal value.
- 1974 GSA officially takes occupancy of the building.
- 1977 Repair of water leakage.¹
- 1978 The building is renamed in honor of former Congressman Chet Holifield.
- 1987 Renovation of the Chet Holifield Federal Building.
- 1996 Energy-efficient electrical and mechanical upgrade.
- 2003 Energy-efficient roofing upgrade.
- 2005 Elevator and escalator upgrades.
- 2010 HVAC/Mechanical Improvements.

A. Site

The Chet Holifield Federal Building is located in the community of Laguna Niguel. At the time of its original construction in 1971, it was the only building in the area. In recent years the surrounding properties have been developed for commercial and residential uses. Relatively few changes however, have occurred on the Chet Holifield building site. Changes to the site include: the re-alignment of Alicia Parkway, repurposing of some of the original parking areas, and changing the primary building approach

¹ "Ziggurat Repair to Cost \$62,000." *The Register*. September 20, 1977.

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and entrance from the north to the south side of the building. The relocation of the primary site entry does not affect the building's significance as the north entry is still accessible.

Additionally, an outdoor play area has been added in a former parking area on the northwest corner of the site. The play area includes a sheet metal shade canopy, chain link fencing, new paving materials, and play structures. Due to the topography of the site and surrounding landscaping, the new play area is well shielded from view and it does not substantially detract from the original character of the site.

The site also includes a detached storage and maintenance building facility (Building 502), helipad, and pump house (Building 503) all located to the west of the main building and constructed at the same time. Building 502 does not share the same architectural detailing as the Chet Holifield Federal Building. Guard Stations are located at the east and west entries.

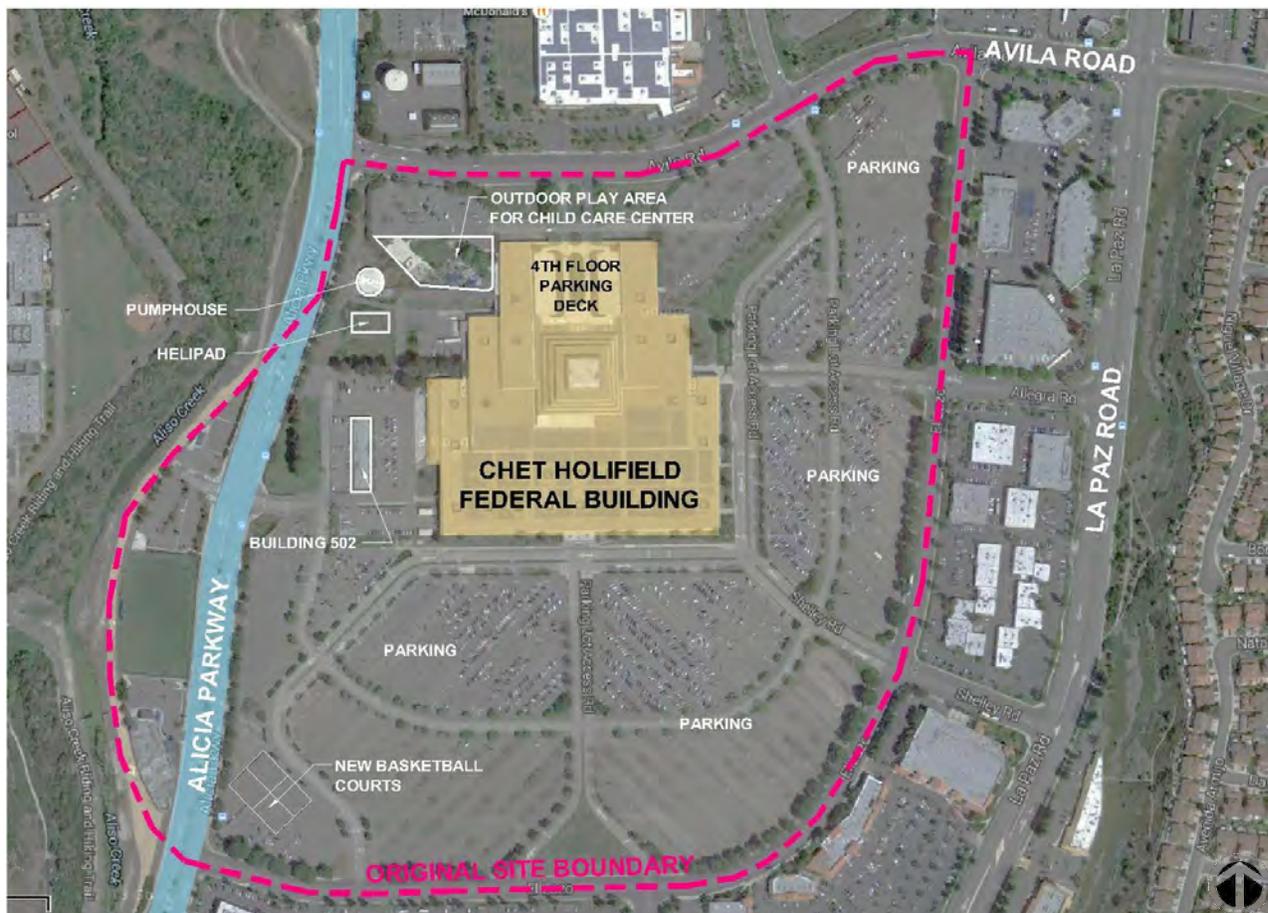


Figure 1: Site for the Chet Holifield Federal Building property showing the building and surrounding parking lots. The original site boundary is shown dashed (in red) and the realignment of Alicia Parkway is shown in blue.

Parking:

According to the original drawings, the Chet Holifield property included 5,814 parking spaces in surface lots around the building. Eighty additional parking spaces were located on the fourth floor parking deck at the main entrance on the north side of the building. The fourth floor parking was actually located on

The original 1968 drawings indicate a double row of multi-trunk European Olive trees (Olea europaea) planted in pyramidal berms flanking the front entry drive. The drawings also show pre-cast concrete planters at the perimeter of the parking deck. The planters have been removed and the olive trees have been replaced with shrubs. Additionally, shrubs and annual flowering plants have been added in the original lawn area in the center. However, the general layout of the parking deck remains unchanged including the vehicle access roads, sidewalks, curbs, and planting areas. The north entry and parking deck were the original main entrance to the site. Although the main public entrance has been moved and the parking area is no longer used, this area continues to contribute to the overall historical character of the building.

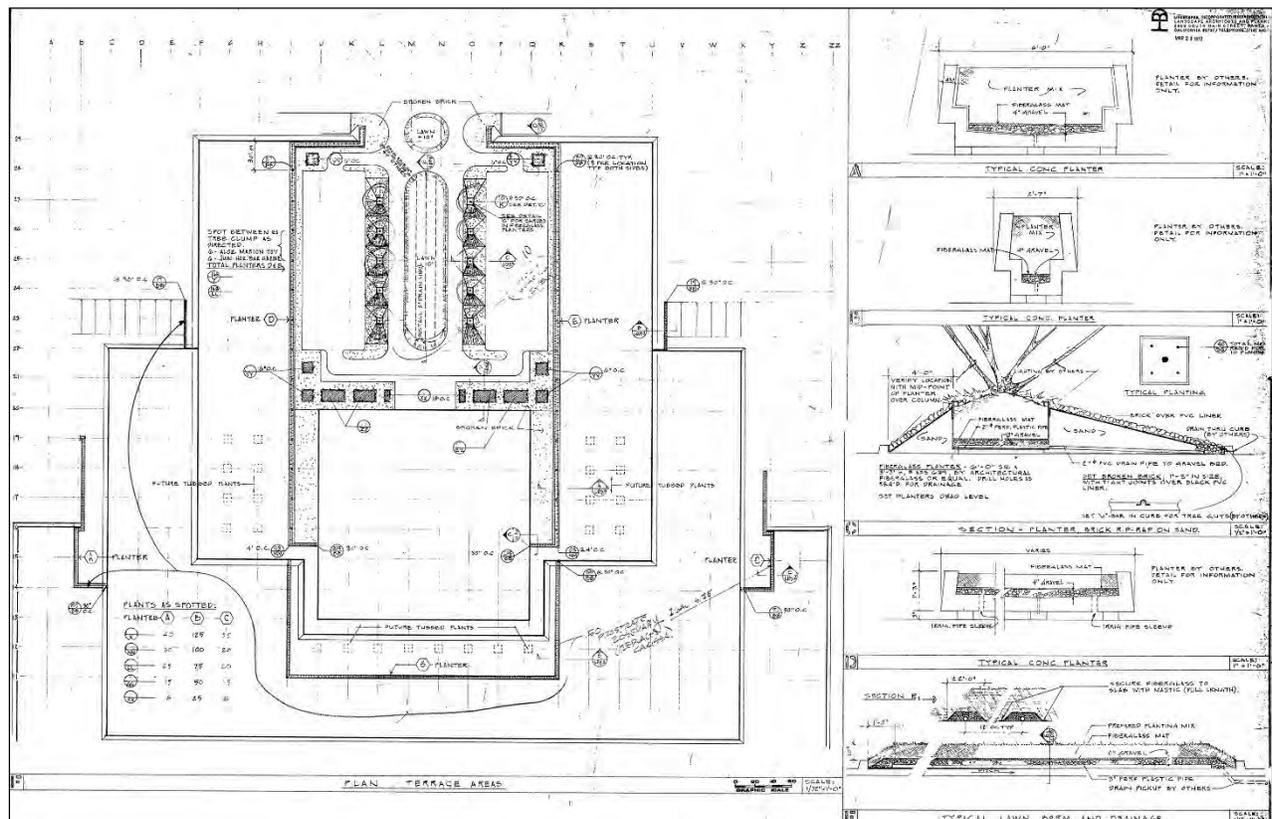


Figure 3: Original terrace plan, July 29, 1968.

B. Main Building

Exterior:

The exterior of the building retains a high degree of integrity and is the most significant. The main character-defining features of the building, including the massing, stepped ziggurat shape, linear fenestration, and pebble-textured pre-cast concrete cladding remain intact. The building has been painted a pale yellow color. Early photographs of the building indicate that it was originally gray, possibly unfinished concrete.

CHET HOLIFIELD FEDERAL BUILDING

The Chet Holifield Federal Building has a concrete structural system with cast-in-place concrete columns on a 30-foot structural grid and a “spancrete” pre-cast concrete floor system at each level. The floor system below the fourth floor traffic deck on the north side of the building and at the helipad on the upper roof is more substantial to accommodate the additional structural loads associated with vehicular traffic and parking. The structural deck in these areas consists of a concrete deck with 2-foot deep pan joists. The exposed concrete columns of the building were originally labeled in accordance with the structural grid noted on the 1968 construction drawings. The notation is still visible on many of the existing columns. There is no evidence of any significant changes to the original concrete structural systems.

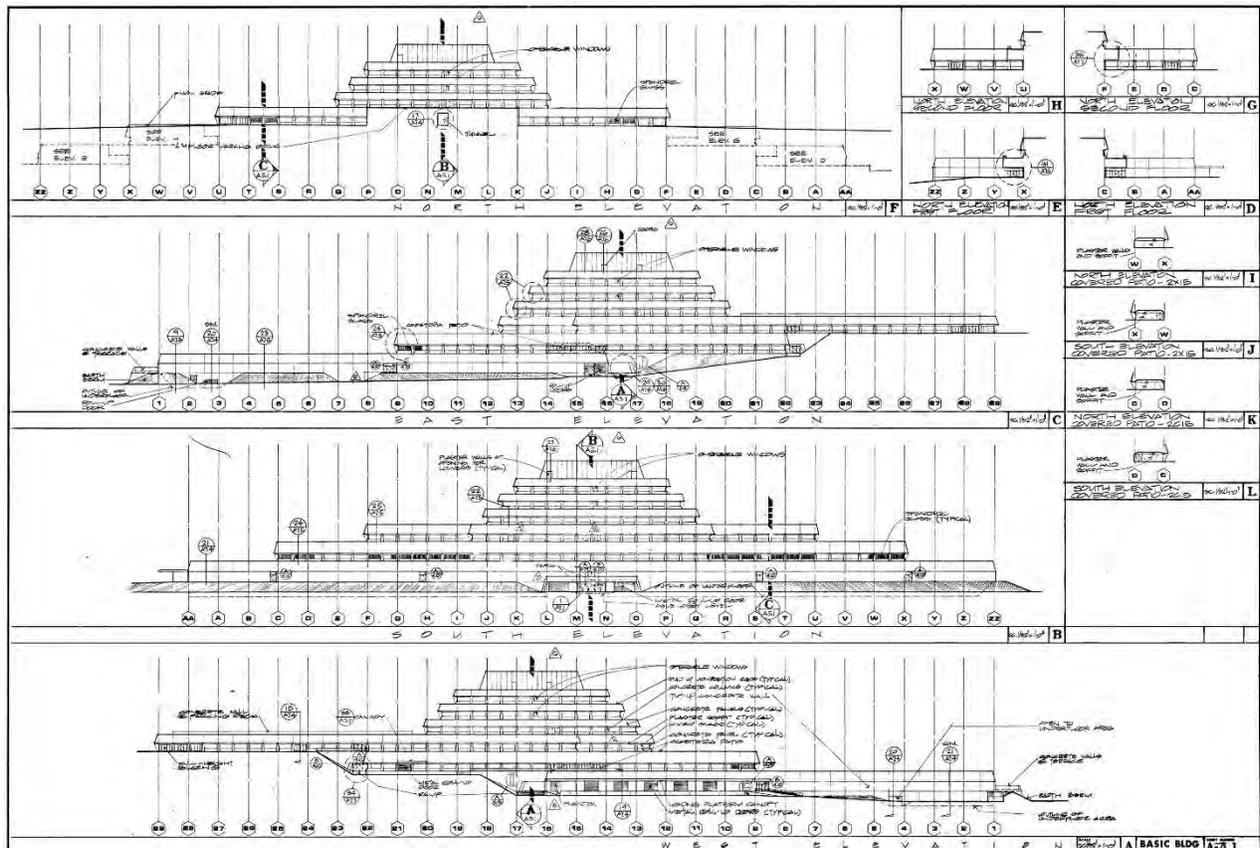


Figure 4: Original building elevations showing the stepped ziggurat shape, July 29, 1968.

The roofs of the building are generally flat and finished with composition roofing. The upper roof was originally used as a helipad. In recent years, mechanical and communications equipment have been added to the upper roof and the helipad has been moved to an adjacent area on the site. Textured fiberglass fins have been added to help screen some of the equipment. Solar panels have also been added on the lower roofs at the south side of the building.

The exterior window system appears to be original. They are single-pane dark bronze aluminum windows with a dark coating on the glass. The original 1968 specifications indicate Series 900 windows by Soule Architectural Products or equal. The specifications also note gray-colored plate glass for all

exterior windows. Exterior doors at the building generally consist of dark bronze colored aluminum framed doors with glass lites that match the dark coating of the windows.

Interior:

General:

The interior of the Chet Holifield Federal Building is generally occupied by private office suites housing various federal agencies. There are relatively few significant character-defining interior spaces. The original Main Lobby located on the north end of the fourth floor is the most significant interior space in the building. The fourth floor lobby features a decorative wood ceiling treatment and wood wall paneling. Other important interior spaces include the elevator lobbies and the main corridors. The offices and support spaces in the rest of the building are generally repetitive and lack significant specialized interior detailing to be considered important to the overall historical character of the building.

According to the original drawings, the main office areas in the building were originally large open areas without interior walls and partitions in most areas of the building. In many spaces, walls have been added to subdivide the spaces into smaller office suites and private offices. The additional walls are evident because the ceiling grid does not line up with the walls. The walls, which were added after the ceiling finish, bisect the tile grid and light fixtures in many locations. Since these changes have generally occurred in secondary interior office spaces, the overall impact to the historical character of the building is minor.

The original interior finishes, such as flooring and interior paint, have been replaced several times to facilitate continued use of the building for offices. In general, the original interior finishes in the building appear to have been fairly standard including carpet, resilient flooring, ceramic tile, and painted surfaces. These finishes have been replaced with similar, though more contemporary, finishes. Overall the renewal of interior finishes is an anticipated change in this building and it has not significantly impacted the historical character of the building because the original finishes were not of particular craftsmanship or significance.

Escalators:

There are two sets of escalators which connect the main north/south corridors from the underfloor to the third floor. The underfloor, as noted in the original drawings, is the south side entrance level below the first floor. The original 1968 drawings indicate that there was originally one escalator going up from the underfloor to the third floor. The existing escalators, which go down from the third to the underfloor (on the west wall of the corridor), were added during the 1987 remodel, replacing the original stairs. The replacement of the original stairs does not significantly impact the historical character of the building because the original stairs were not of particular craftsmanship or significance. Above the third floor, the fourth through seventh floors can be accessed by interior stairs or elevators.

Ceilings:

One of the few original decorative interior features in the Chet Holifield Federal Building is the wood ceiling treatment that is located in primary interior spaces such as the Main Lobby on the fourth floor, elevator lobbies on all levels, above the escalators, and at the recessed entry on the south side of the underfloor. The decorative ceiling finish includes suspended, evenly-spaced, clear-finished wood boards. The ceiling finish contributes to the architectural character of the building.

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The rest of the interior ceilings are primarily finished with suspended acoustical ceilings with recessed fluorescent lighting. The ceiling finish and lighting appear to be original.

Restrooms:

Restroom finishes have generally been replaced. The original specifications called for ceramic tile on walls and floors with baked enamel toilet partitions. The ceramic tile, toilet partitions, and fixtures have been replaced in all restrooms. The general location, configuration, and size of the restrooms appear to match the original design.

Interior Doors:

The original interior doors were wood slab doors with a light stain finish in metal frames. Many of the original doors remain at the main corridors.

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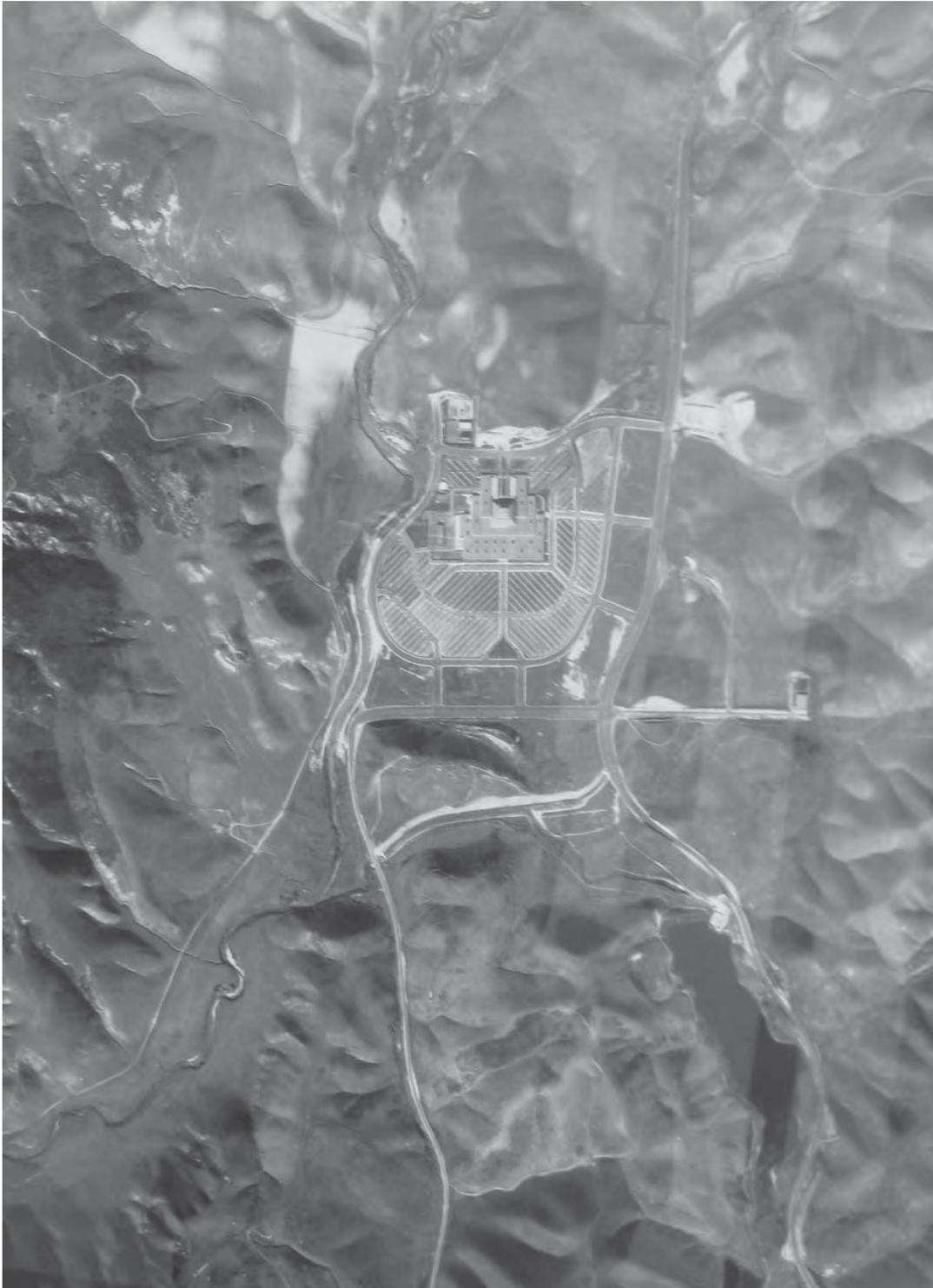


Image 1: Aerial photo of the Chet Holifield Federal Building site shortly after the completion of construction in 1971. The land surrounding the site is undeveloped. (Source: General Services Administration.)



Image 2: The Chet Holifield Federal Building under construction. (Source: General Services Administration.)

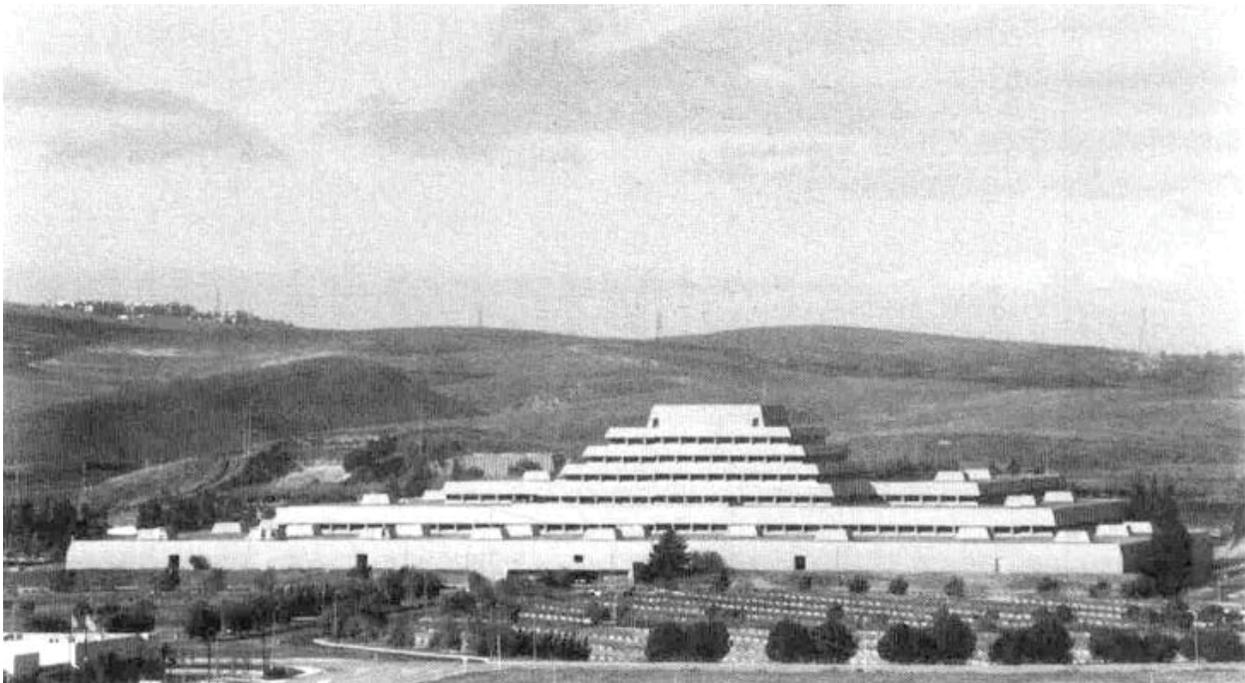


Image 3: The Chet Holifield Federal Building ca. 1971 looking north. (Source: *The Journal of San Diego History* Volume 38 No. 2.)

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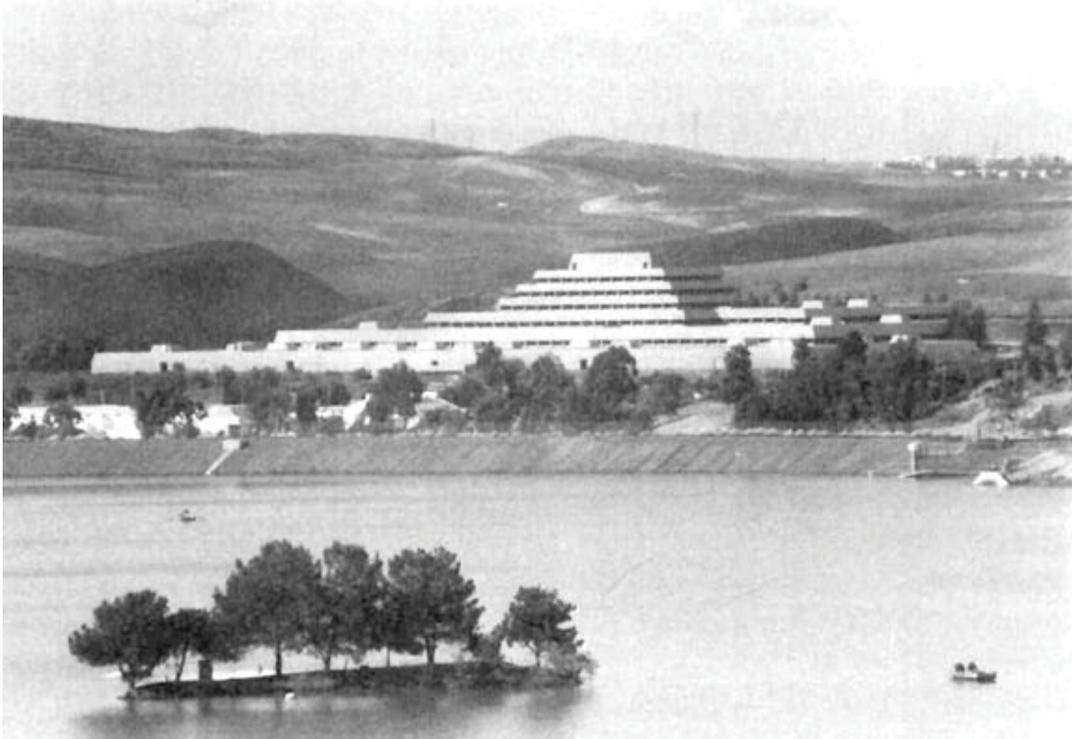


Image 4: The Chet Holifield Federal Building ca. 1970s looking north. The area in the foreground is flooded. (Source: *The Journal of San Diego History* Volume 38 No. 2.)



Image 5: The genealogical research room located on the first floor, ca. 1974. (Source: *The Journal of San Diego History* Volume 38 No. 2.)



Image 6: The Chet Holifield Federal Building looking northeast ca. 1970s. This early color photo shows the original gray color of the exterior. (Source: General Services Administration)

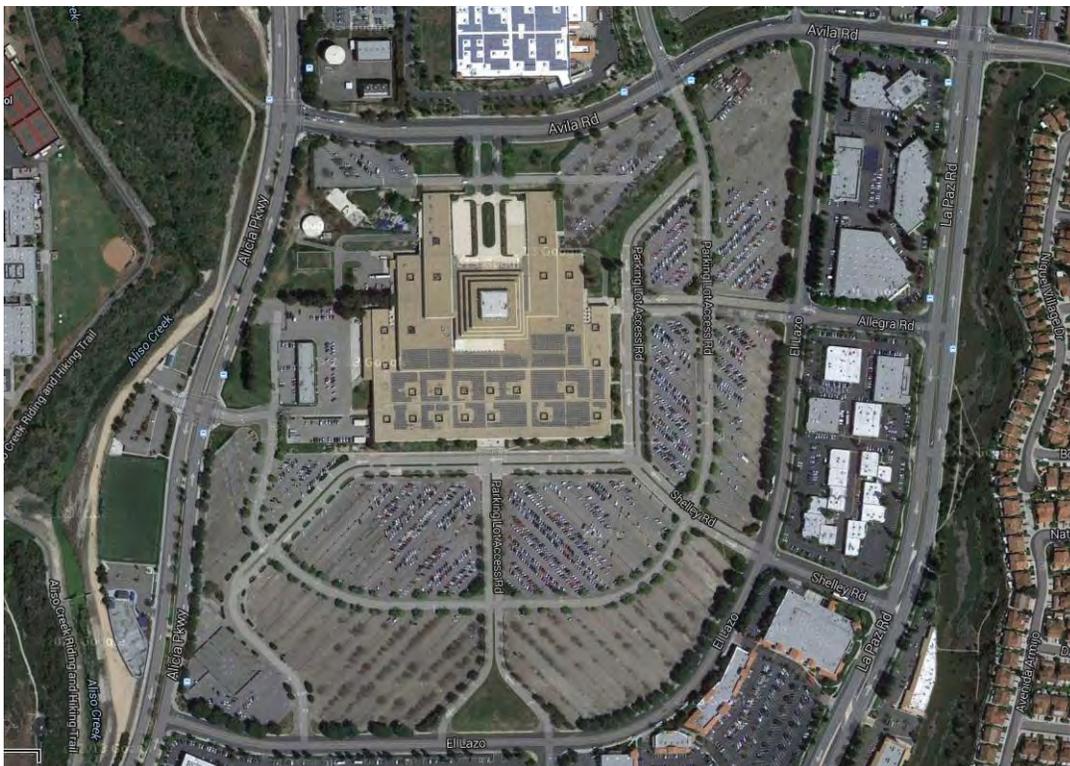


Image 7: Current Google Maps aerial photo of the Chet Holifield Federal Building site. The surrounding area on all sides of the property have been developed with numerous commercial and residential uses. (Source: Google Maps)

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Image 8: The original main entry to the Chet Holifield Federal Building on the north side of the building. The entry drive leads to two parking areas which are located on top of the third floor roof deck. These lots are currently closed and the main public entrance has been moved to the opposite side of the building.



Image 9: The original main entrance located on the north facade.



Image 10: The parking area at the north side of the building looking down from the roof.



Image 11: The north wall of the third floor looking west.

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Image 12: The east facade looking southeast.



Image 13: The east entrance looking west.



Image 14: The south facade of the Chet Holifield Federal Building looking north from the parking entrance.



Image 15: The south facade looking northwest toward the south entrance. This entrance now serves as the main public entrance to the building.

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Image 16: The west facade looking southeast toward the loading dock.



Image 17: A secondary building entrance on the west facade.



Image 18: The loading dock on the west facade of the building.



Image 19: A detached storage and maintenance building to the west of the loading area. This building was constructed at the same time as the main building, but it does not share the same architectural detailing.



Image 20: An outdoor play area that has been added at the northwest corner of the site in a former parking area.



Image 21: The southwest corner of the parking area. The outer sections of parking are under utilized and not regularly maintained.

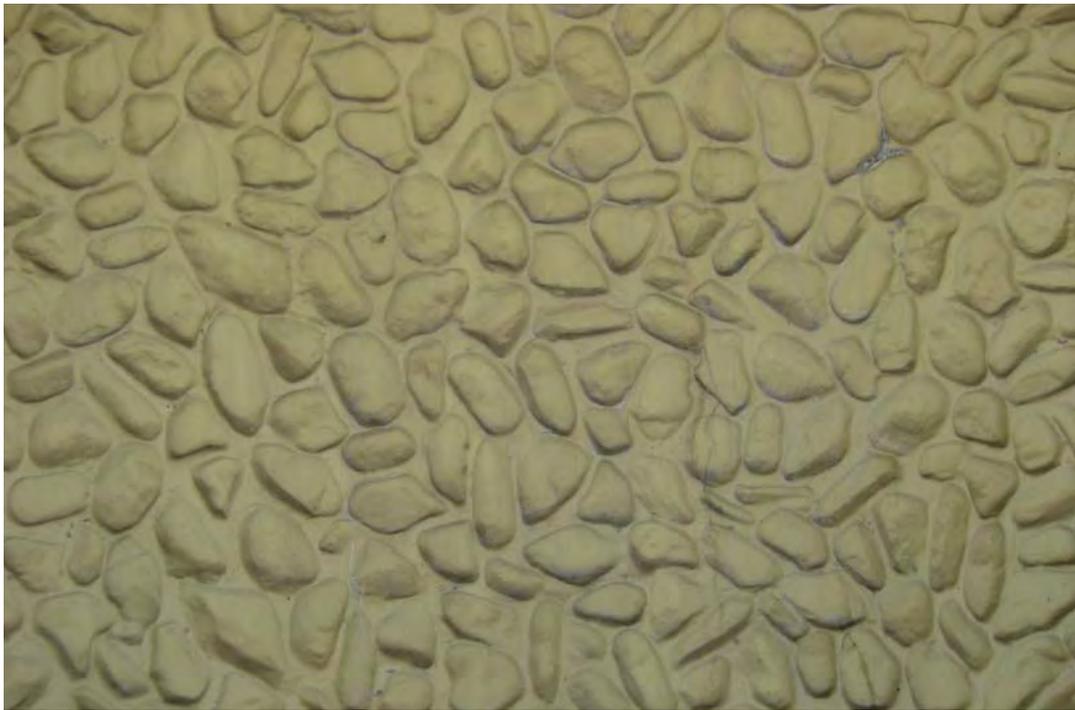


Image 22: Close-up view of the typical exterior wall finish. The pre-cast concrete panels have a pebble texture.



Image 23: The main entry corridor at the south entrance looking north toward the main escalators.

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Image 24: A typical interior corridor on the first floor. The suspended ceiling is original and matches interior photos from the 1970s (Refer to Image 5).



Image 25: Typical original interior flush wood doors on the first floor.



Image 26: The cafeteria on the second floor. The basic size and configuration of the cafeteria are original. The interior fixtures and finishes have been replaced.



Image 27: The cafeteria dining area.

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Image 28: Outdoor dining area adjacent to the cafeteria on the east side of the building.



Image 29: A covered vestibule at the outdoor dining area. The wood ceiling finish is original. The same detail is used at other primary interior spaces including elevator lobbies, escalator areas, and the south entrance.



Image 30: A numbered structural column. The numbers corresponds with the original drawings and can be found on structural columns throughout the building.



Image 31: A typical corridor on the second floor. The interior finishes in this corridor have been replaced.



Image 32: A typical office area on the second floor.



Image 33: A typical restroom on the second floor. Finishes, fixtures, toilet partitions, and accessories have been replaced.



Image 34: The escalators on the second floor. The suspended ceiling and wood ceiling finish are original.

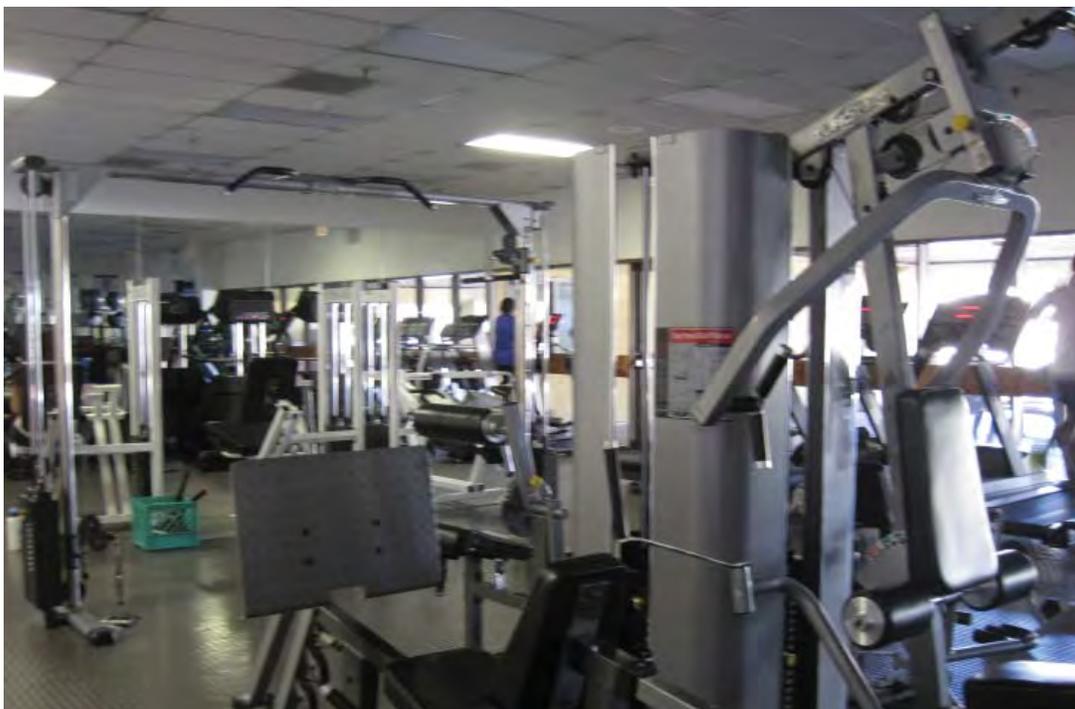


Image 35: The fitness center on the second floor. The interior finishes have been replaced.



Image 36: A typical office area on the third floor. The suspended ceiling appears to be original, but other interior finishes have been replaced.



Image 37: The child care center on the third floor. A new sheet metal shade canopy has been added on the original exterior wall.



Image 38: The interior of the child care center. Interior finishes and fixtures have been replaced.



Image 39: A typical office area on the third floor. The ceiling appears to be original but other finishes and fixtures have been replaced.

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Image 40: The original main lobby on the fourth floor. This space features original wood wall paneling and a decorative wood ceiling finish.



Image 41: A detail of the original wood ceiling finish at the fourth floor lobby.



Image 42: The sixth floor roof. Textured fiberglass fins have been added to conceal some of the added equipment on the upper edge of the roof.



Image 43: A detail of the added fiberglass equipment screens from above.

SECTION IV – ELIGIBILITY EVALUATION

A. National Register Criterion

In order to evaluate properties for inclusion in the National Register of Historic Places, the Criteria for Evaluation (36 CFR 60.4) was applied according to the guidelines set forth in the National Register Bulletin 15 and 16A. According to National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation, the resource must be associated with an important historic context.¹ Second, the resource must “possess integrity of location, design, setting, materials, workmanship, feeling, and association.” Third, the resource must meet at least one of four “evaluation criteria” for determining the quality of “significance in American history, architecture, archeology, engineering, and culture”. If a property is less than 50 years old, it may also be eligible under Criteria Consideration G upon achieving “significance within the past 50 years if it is of exceptional importance.”²

A. Associated with events that have made a significant contribution to the broad patterns of our history

The Chet Holifield Federal Building was constructed as a result of the defense and aerospace industry build-up. However, the building was never utilized as it was originally intended and left empty and abandoned by Rockwell for four years before its transfer of ownership to GSA. In addition, the project did not spur local trends as the surrounding areas were developed as residential and commercial.

Since the property was not originally constructed by GSA, a discussion of the five sub-categories listed in the GSA Eligibility Assessment Tool is not applicable for this building. Therefore, considering the National Register requirements only, it is our professional opinion that the Chet Holifield Federal Building does not meet eligibility for listing under Criterion A.

B. Associated with the lives of persons significant in our past

The complex was renamed in 1978 to Chet Holifield Federal Building in honor of the former Representative Chester Earl Holifield. However, naming a property in honor of an important individual does not make the site significant. In addition, historical research failed to reveal any other exceptionally significant persons that would justify being exceptionally important to local, state, or national history. Therefore, the complex does not meet eligibility for listing under Criterion B.

C. Embodies the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction.

The Chet Holifield Federal Building is an excellent example of a modernist architectural and landscape design within the local context. The Chet Holifield Federal Building is Modern with stepped pyramidal influences similar to that of the ancient ziggurats. The building has several tiers and is constructed of angled, painted, pre-cast concrete panels with reticulation, and a pebble textured finish that displays curvilinear forms. The building also displays some Brutalist influences, which is distinguished by bold, massive forms; rough, exposed concrete surfaces; broad, expansive wall planes; and recessed windows. Furthermore, its surrounding landscape and parking lot contributes visually to the building's

¹ National Park Service, *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*. (Washington D.C.: National Park Service, 1990), 3.

² *Ibid.*, 41-43.

monumental feeling. The grass panels, trees, landscaped beds, and platers provide contrast to the massive concrete structure. When the site was developed, more than 2,500 trees and 6,500 shrubs were included in the initial plan.

The Chet Holifield Federal Building's style is extremely rare. Locally there are no other buildings of this type in the city of Laguna Niguel. The style is also rare statewide and nationally with only two modern ziggurat-style buildings listed in the National Register of Historic Places. There are only seven known ziggurat buildings throughout the nation and only two of which are located in California:

- United State Bullion Depository Gold Vault, Fort Knox, Kentucky, designed by architect Louis A. Simon (1936)³, listed in the National Register of Historic Places;
- Solomon R. Guggenheim Museum, New York, New York, conceived as an “inverted ziggurat” by architect Frank Lloyd Wright (1959)⁴, listed in the National Register of Historic Places;
- Chet Holifield Federal Building, Laguna Niguel, California (1971);
- National Geographic Society Headquarters, Washington, D.C., designed by Skidmore, Owings, & Merrill (1984);
- University of Tennessee, John C. Hodges Library, Knoxville, Tennessee, designed by McCarty Bullock Holsaple, Lindsay & Maples, and Cooper & Peery (1987);
- The Temple Eck, Chanhassen, Minnesota (1990);
- The Ziggurat, Headquarters of the California Department of General Services, West Sacramento, California (1997).

In addition, the building was designed by William L. Pereira. William Pereira was a nationally-prominent practitioner of Modernist architecture. Pereira has been recognized as a leader of the modernist movement and is known, especially throughout California. His work spans nearly 50 years and contributes to over 400 projects. His stylish and efficient architectural style had a tremendous impact on California from the 1950s through the 1980s. To date, Pereira is most acknowledged for his CBS Television City (1953), University of Southern California Master Plan (1960), Irvine Ranch Master Plan (1961), University of California San Diego Central/Geisel Library (1965), LAX Master Plan (1967), and the Transamerica Corporate Headquarters Tower (1973). Although not as prominent as these, the Chet Holifield Federal Building can also be locally classified as a significant modern building in Pereira's architectural repertoire as there are no other comparative buildings of its kind in the city of Laguna Niguel.

Since the property was not originally constructed by GSA, a discussion of the seven sub-categories listed in the GSA Eligibility Assessment Tool is not applicable for this building. In accordance with National Register criteria, it is our opinion that the building appears to be locally significant and eligible under Criterion C for architecture as well as its association with master architect William L. Pereira. However, the building is less than 50 years and must be considered for its exceptional significance under Criterion G.

³ The building was listed on the National Register of Historic Places in 1988 in recognition of its significance in the economic history of the United States and its status as a well-known landmark.

⁴ The building was listed on the National Register of Historic Places in 2005 and was designated as a National Historic Landmark in 2008.

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

The Chet Holifield Federal Building is not likely to yield additional information important to Laguna Niguel, California or our Nation's history, and therefore the structure is ineligible to the National Register under this criterion.

Criteria Consideration G

Criteria Consideration G provides that a property may be eligible for listing in the National Register even if it is less than 50 years old if it is “[a] property...of exceptional importance.” (36 C.F.R. § 60.4). The phrase “exceptional importance” may be applied to the extraordinary importance of an event or to an entire category of resources so fragile that survivors of any age are unusual. A property that has achieved significance within the past fifty years can be evaluated only when sufficient historical perspective exists to determine that the property is exceptionally important. The necessary perspective can be provided by scholarly research and evaluation, and must consider both the historic context and the specific property's role in that context.⁵ The National Register does not include properties important solely for their contemporary impact and visibility, and it rarely is possible to evaluate historical impact, role, or relative value immediately after an event occurs or a building is constructed.⁶ To be considered under this criterion, a property must also meet eligibility requirements for Criteria A, B, C, or D.

While the Chet Holifield Federal Building does meet eligibility for Criterion C, it also rises to the level of “exceptional significance” as required by the National Register due to its rarity of architectural style, landscape design, and its association with master architect William L. Pereira. The modernist design with its stepped pyramidal and Brutalist influence are rare both locally and statewide as there are only two existing in California, the Chet Holifield Federal Building (1971) and the Ziggurat, Headquarters of the California Department of General Services (1997), of which the Chet Holifield Federal Building is the oldest. Nationally, it is unique for its era of construction and differentiates itself from the Guggenheim as it is not an inverted ziggurat. Therefore, at this time, it is our professional opinion that the Chet Holifield Federal Building does meet eligibility under Criterion Consideration G.

B. Integrity

In addition to having significance under at least one criterion, resources must have integrity. Integrity is the authenticity of a historical resource's physical identity as evidenced by the survival of characteristics or historic fabric that existed during the resource's period of significance. A period of significance is the date or span of time within which significant events transpired, or significant individuals made their important contributions. Alterations to a resource or changes in its use overtime may have historical, cultural or architectural significance. Simple resources must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance.

⁵ *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation.* (Washington, D.C.: National Park Service 1990), 41-42.

⁶ Marcella Sherfy and W. Ray Luce, *National Register Bulletin 22: Guidelines for Evaluating and Nominating Properties that have Achieved Significance Within the Past Fifty Years* (Washington, D.C.: National Park Service, 1998 ed.), p. 1. “The passage of time is necessary in order to apply the adjective ‘historic’ and to ensure adequate perspective. To be a useful tool for public administration, the National Register cannot include properties of only transient value or interest. The passage of time allows our perceptions to be influenced by education, the judgment of previous decades, and the dispassion of distance. In nominating properties to the National Register, we should be settled in our belief that they will possess enduring value for their historical associations, appearance, or information potential.”

Integrity is defined as the ability of a resource to convey its significance through the property's physical features and how those features relate to the property's significance, although not all seven aspects of integrity need to be present for a property to be significant. The National Register recognizes location, design, setting, materials, workmanship, feelings, and association as the seven aspects of integrity. Evaluation of the Chet Holifield Federal Building includes the application of the seven aspects of integrity as follows:

Location – is the place where a resource was constructed or where an event occurred.

The Chet Holifield Federal Building retains integrity of location as the buildings have not been moved.

Design – results from intentional decisions made during the conception and planning of a resource. Design includes form, plan, space, structure, and style of a property.

To retain integrity of design, the complex must retain elements which exhibit its historic form, space, and style. The exterior of the complex to date remains relatively intact with only a few modifications since construction including exterior paint finish and mechanical, communication, and solar equipment located on the roof. The building retains its angled, painted, pre-cast concrete panels with textured finish and its evenly spaced anodized aluminum windows which provide a consistent rhythm to the symmetrical building. The top tier's large flat roof with attached protruding vertical elements still remains today.

The building's landscape also contributes to the overall design intent of the site. The building continues to be surrounded by landscaping and a large parking lot with spaces that radiate diagonally along the building axes. The moat of smooth rocks that surrounds the building on three sides still alludes to the idea that the massive structure is a modern-day fortress.

The interior changes to the Chet Holifield Federal Building do not significantly impact the historical character of the building because the original finishes were not of particular craftsmanship nor significance and do not compromise the experience of the building from the public approach and view. The original character defining interior features, such as the wood paneling and wood ceiling at the main lobby, remain intact. The removal of the original stair and its escalator replacement possibly provides the most impact to the interior design, but is overall a minimal change.

Therefore, the Chet Holifield Federal Building has retained a high level of its design integrity.

Setting—applies to a physical environment, the character of a resource's location, and a resource's relationship to the surrounding area.

The Chet Holifield Federal Building is located in its original setting surrounded by mass landscape which contributes visually to the building's monumental feeling. The large parking areas, grass panels, trees, landscaped beds, and platers continue to provide contrast to the massive concrete structure. Therefore, the property has retained its integrity of setting.

Materials—comprise the physical elements combined or deposited in a particular pattern or configuration to form a property.

The vast majority of the original structure's materials have been retained throughout the years and visually appears as it did when first constructed including the pre-cast, textured exterior panels and anodized aluminum windows. Therefore, the Chet Holifield Federal Building has maintained its material integrity.

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Workmanship—consists of the physical evidence of crafts employed by a particular culture, people, or artisan, which includes traditional, vernacular, and high styles.

Architectural/engineering influences reflect popular building or structural movements of the times. The overall workmanship demonstrated and the materials used in the construction of the complex are reflective of the era in which it was constructed and are intact. The integrity of workmanship is clearly retained.

Feeling—Integrity of feeling relies on present physical features of a property to convey and evoke an aesthetic or historic sense of past time and place.

The Chet Holifield Federal Building possesses a high degree of integrity of feeling to express the Modern aesthetic style of the era it was constructed. The building is monumental in feeling while the landscaping adds a human scale to the site. A walk around the building or into the building still evokes the feeling of a Modernist/Brutalist building.

Association—directly links a historic property with a historic event, activity, or person of past time and place; and requires the presence of physical features to convey the property's historic character.

The Chet Holifield Federal Building was commissioned by the Rockwell Corporation, but was never occupied by the company. The building laid vacant for many years until it was sold to the Federal government which began occupancy in 1974 for offices and national archive storage. The complex does not retain integrity of association with the Rockwell Corporation as the building's occupancy and use changed shortly after the building construction.

Therefore, it is our professional opinion that the Chet Holifield Federal Building remains largely intact with the majority of the original design intent visibly apparent throughout the building and site. It is evident that the building was constructed in substantial conformance with the original construction drawings. For the most part, the existing conditions reflect what is shown in the original 1968 drawings. The Chet Holifield Federal Building, therefore, continues to retain a high degree of integrity.

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SECTION V – CONCLUSION

The Chet Holifield Federal Building is currently eligible for listing in the National Register of Historic Places. The property maintains a high degree of integrity and meets the eligibility requirements under Criterion C and is of “exceptional importance” under National Register Criteria Consideration G when evaluated within local, state, and national contexts. The Chet Holifield Federal Building distinguishes itself as the work of a master architect, William L. Pereira, a nationally-prominent practitioner of Modernist architecture. The building and site also expresses its significance for embodying distinctive characteristics of Modernist/Brutalist design. The rarity of its ziggurat design influence, having seven tiers atop a sloped lot with surrounding landscape, continues to allude to the idea that the massive structure is a modern-day fortress.

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APPENDIX E: GENERAL CONFORMITY ANALYSIS

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INTRODUCTION

The General Conformity Rule (GCR) was established to ensure that federal activities do not hamper local efforts to control air pollution. In particular, the GCR implements Section 176(c) of the Clean Air Act (CAA), which prohibits federal agencies from engaging in, supporting, licensing, or approving any action that does not conform to an approved state or federal implementation plan. The purpose of the GCR Applicability Analysis is to determine whether Alternative 1 at the Chet Holifield Federal Building (CHFB) is subject to the federal GCR. Alternative 1 involves redevelopment of 27.15 acres of the site and construction of a new office building, relocation of several current CHFB tenants into leased spaces in and around Orange County, and the eventual disposal of the remaining 64.85 acres including the existing CHFB to another federal or state agency or to a private developer for reuse or redevelopment.

Alternative 1 would result in emissions from the use of construction equipment, passenger vehicles, and trucks during construction and land preparation activities, as well as fugitive dust emissions. Emissions of nitrogen dioxide (NO₂), carbon monoxide (CO), particulate matter with an aerodynamic diameter less than or equal to 10 micrometers (PM₁₀), particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometers (PM_{2.5}), and sulfur dioxide (SO₂) were calculated. These calculations demonstrate that the emissions resulting from Alternative 1 would be below the *de minimis* levels defined for those pollutants in the Applicability Section of the GCR and would not be regionally significant. Therefore, the GCR is not applicable to Alternative 1.

GENERAL CONFORMITY RULE APPLICABILITY ANALYSIS

The purpose of this analysis is to determine whether Alternative 1 at the CHFB is subject to the federal GCR established in 40 Code of Federal Regulations, Part 93 (40 CFR Part 93), Determining Conformity of Federal Actions to State or Federal Implementation Plans. This analysis will determine if Alternative 1:

- Is not subject to the rule – The action does not emit criteria pollutants or precursors for which the area is designated as a *nonattainment* or maintenance area; all procurement actions are excluded from the GCR;
- Is exempt or does not exceed *de minimis* levels – Emissions from the action are below *de minimis* levels and are not regionally significant, or the action is exempt; or
- Exceeds *de minimis* levels or is regionally significant – Emissions from the action exceed *de minimis* levels; a Conformity Determination must be prepared for such actions.

This analysis is organized into the following sections:

- Background (Section 3) – Information on applicable air emission programs and limitations, including *de minimis* levels;
- Alternative 1 (Section 4) – A description of Alternative 1;
- Methodology and Emissions Calculations (Section 5) – Procedures and results for estimating emissions associated with Alternative 1; and
- Conclusion (Section 6) – Assessment of whether the GCR is applicable to Alternative 1.

BACKGROUND

As part of the implementation of the CAA Amendments, the USEPA issued National Ambient Air Quality Standards (NAAQS) for six criteria air pollutants: CO, SO₂, particulate matter (PM₁₀ and PM_{2.5}), ozone (O₃), NO₂, and lead (Pb). USEPA defines ambient air in guidelines established in 40 CFR Part 50 as “that portion of the atmosphere, external to buildings, to which the general public has access.”

The Clean Air Act divides the U.S. into geographic areas called “air quality control regions” (AQCRs). These AQCRs are established areas such as counties, urbanized areas, and consolidated metropolitan statistical areas. An AQCR in which levels of a criteria air pollutant meet the health-based NAAQS is defined as an attainment area for the pollutant, while an area that does not meet the NAAQS is designated a *nonattainment* area for the pollutant. An AQCR that was once designated a *nonattainment* area but was later reclassified as an *attainment* area is known as a maintenance area. *Nonattainment* and maintenance areas can be further classified as extreme, severe, serious, moderate, or marginal.

An AQCR may have an acceptable level for one criteria air pollutant but may have unacceptable levels for other criteria air pollutants. Thus, an area could be *attainment*, maintenance, and/or *nonattainment* at the same time for different pollutants. Each state that contains at least one nonattainment air quality control region is responsible for submitting a State Implementation Plan (SIP), which specifies the manner in which NAAQS will be achieved and maintained. Maintenance areas must adhere to a maintenance plan for the specific pollutant for which the area was initially designated *nonattainment*.

The CHFB is located in Orange County, California. Orange County is located in the Metropolitan Los Angeles AQCR. Within California, air quality is managed by the California Air Resources Board (CARB). The South Coast Air Quality Management District (SCAQMD) administers air quality rules and programs for Orange County and neighboring areas. USEPA has designated Orange County, California as a nonattainment area for O₃ and PM_{2.5} and a maintenance area for CO, NO₂ and PM₁₀ (USEPA 2020a). On March 3, 2017, the SCAQMD approved the 2016 Air Quality Management Plan (AQMP) that includes strategies for attainment of the 1-hr and 8-hr ozone NAAQS as well as the latest 24-hr and annual PM_{2.5} standards (SCAQMD 2020).

Because Orange County, California is a *nonattainment* area for O₃ and PM_{2.5} and a maintenance area for CO, NO₂, and PM₁₀, an applicability analysis is required using the criteria for a *nonattainment* and maintenance area. Therefore, potential emissions for these criteria pollutants were calculated and compared to the corresponding *de minimis* rates. For purposes of analysis and completeness, potential SO₂ emissions were also calculated. Note that ozone is a secondary pollutant that is not emitted directly but is created when NO₂ reacts with volatile organic compounds (VOCs) and oxygen in the presence of sunlight. Therefore, direct ozone emissions were not estimated; VOC emissions were estimated instead of ozone. Emissions of lead were also not analyzed because no project activity would result in lead emissions.

The criteria used in the GCR applicability analysis are listed in the Applicability Section of the GCR, Section 93.153(b), which defines *de minimis* emission rates for criteria pollutants based on the degree of nonattainment. Table E-1 lists the *de minimis* levels that were used in this analysis (USEPA 2017). Section 51.853(i) of the GCR stipulates that a project is considered regionally significant when total emissions from the project exceed a *nonattainment* or maintenance area’s total emission budget for each applicable pollutant by 10 percent or more.

Table E-1. De Minimis Levels for Alternative 1

Criteria Pollutant	CAA Designation for the Project Area	De Minimis Emission Rate (tons/year)
CO	Maintenance	100
NO ₂	Maintenance	100
O ₃	Nonattainment (extreme)	10 ¹
SO ₂	N/A	100 ²
PM ₁₀	Maintenance	100
PM _{2.5}	Nonattainment (serious)	70

Source: USEPA 2017

¹ Ozone emissions were not estimated since it would not be emitted directly from project activities. VOC emissions were estimated instead and compared to the *de minimis* threshold.

² Note that the *de minimis* threshold for SO₂ does not apply to the Proposed Action since Orange County is not a designated non-attainment or maintenance area for this pollutant.

Note: CO = carbon dioxide; NA = not applicable; NO₂ = nitrogen dioxide; O₃ = ozone; PM_{2.5} = particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometers; PM₁₀ = particulate matter with an aerodynamic diameter less than or equal to 10 micrometers; SO₂ = sulfur dioxide.

ALTERNATIVE 1

Alternative 1 would include construction of a new federal building on a portion of the existing 92-acre parcel to house the USCIS (approximately 2,000 staff) while relocating all other tenants into existing Class A lease space within the region. The existing building would be vacated by current tenants and the remainder of the property not retained for construction of the new federal building (i.e., 64.85 acres) would be reported as excess in accordance with federal policy and disposed. The new building concept would be approximately 380,000 square feet across four levels and would include a 1,517-space parking lot. The new structure would also include special support functions including a day care facility, cafeteria, and loading dock. Guard booths would be constructed at entrances and exits to parking areas as well as the loading dock. The facility would be designed with appropriate Anti-Terrorism Force Protection (ATFP) measures for security, to include appropriate structure design (e.g., blast resistant windows, appropriate setbacks), facility entrance, and interior security requirements, as well as surveillance system requirements.

All construction activities, including staging/laydown, would remain within the 27.15-acre site. Construction activities would include utility tie-ins (potable water, wastewater, stormwater, and electricity), erection of structure, and finishing work. Construction equipment would be typical of building construction, including trucks (cement and dump), backhoe, loader, bulldozer, crane, concrete equipment, and paver. Construction would take approximately 30 months to complete. Peak construction could last for up to 15 months with a potential maximum of 300 construction workers and 90 to 100 trucks per day for deliveries and waste removal. During non-peak construction, between 15 to 35 workers would be onsite. All construction and demolition waste would be disposed and recycled at authorized facilities.

METHODOLOGY AND EMISSIONS CALCULATIONS

The USEPA has designated Orange County, California as a severe *nonattainment* area for O₃ and a serious non-attainment area for PM_{2.5}. In addition, the County is a maintenance area for CO, NO₂ and PM₁₀. Therefore, this applicability analysis developed estimates of the Alternative's potential emissions of VOCs (as a precursor of O₃), PM_{2.5}, PM₁₀, NO₂ and CO; for completeness, potential SO₂ emissions were also estimated. Emissions were estimated for construction activities that would occur within the 27.15-acre boundary.

Note that demolition and construction activities could potentially occur on the remaining 64.85 acres of the CHFB site in the future, following disposition of that portion of the site as excess property under Alternative 1. However, GSA would not have a role or decision in determining the type or extent of future development

on that site. Additionally, in accordance with 40 CFR 93.153(c)(2)(xiv), transfers of ownership, interests, and titles in land, facilities, and real and personal properties are considered to be exempt from conformity determinations.² Therefore, this conformity analysis does not include emissions that could occur as a result of future development activities on the remaining 64.85 acres. Further, any such action would likely be removed in time from construction activities within the retained parcel.

Construction activities would cause temporary air emissions from the following sources:

- Fuel combustion in construction equipment, worker vehicles, and delivery and waste trucks; and
- Fugitive dust emissions from ground-disturbing activities.

Construction emissions were estimated for on-road and nonroad vehicles. The emissions from on-road vehicles such as privately-owned vehicles (POVs) were estimated using industry standard emission rates (Argonne National Laboratory 2013). Emission rates for nonroad vehicles such as excavators, cranes, graders, backhoes, and bulldozers were estimated using USEPA's MOVES 2014b model (USEPA 2015). Fugitive dust emissions were estimated using USEPA's AP-42 emissions factors. See Table E-2 for the emission factors used in the analysis and Table E-3 for the results of the analysis.

To provide a worst-case (i.e., conservative) estimate of emissions on a calendar-year basis, it was assumed that all required nonroad vehicles would be operating full-time (i.e., eight hours per day and five days per week). The types and quantities of construction equipment and the number of operating days as well as the number of workers and trucks were derived from other, similar projects. Additionally, it was assumed that workers would be commuting a total of 20 miles each day, and each worker would be driving their own vehicle (i.e., no carpooling). To estimate fugitive dust emissions, it was assumed that no area would be continuously disturbed for more than 6 months. In practice, some areas would be disturbed for longer periods of time while others would experience much less disturbance. Additionally, large portions of the site are currently paved and therefore dust would not be generated unless ground-disturbing activities are actively taking place in a given area.

² This conformity analysis also does not include emissions that could occur as a result of Alternative 2 considered under the Proposed Action, as the federal action does not include construction and consists of disposal of federal property out of federal ownership. Impacts associated with operations of leased office spaces are assumed to have been considered in previous CEQA analyses for the respective lease location.

Table E-2. Nonroad and On-Road Emissions Factors

Source	Emission Factor Units	Pollutant					
		CO	NO ₂	SO ₂	PM ₁₀	PM _{2.5}	VOC
Non-road Construction Equipment							
Construction equipment, gasoline	g/day/unit	795.0	7.44	0.019	6.21	5.72	-
Construction equipment, diesel	g/day/unit	160.0	300.0	0.507	23.1	22.4	31.32
On-road Vehicles							
Passenger cars, gasoline	g/mile	2.866	0.121	0.006	0.034	0.019	0.170
Passenger trucks, gasoline	g/mile	5.019	0.313	0.007	0.053	0.032	0.283
Commercial trucks, diesel ¹	g/mile	1.036	1.019	0.008	0.107	0.054	0.079

Source: Argonne National Laboratory 2013; USEPA 2015

Note: CO = carbon dioxide; g = grams; NO₂ = nitrogen dioxide; PM_{2.5} = particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometers; PM₁₀ = particulate matter with an aerodynamic diameter less than or equal to 10 micrometers; SO₂ = sulfur dioxide; VOC = volatile organic compounds.

Table E-3. Annual Nonroad and On-Road Vehicle Emissions Under Alternative 1

Source	Criteria Pollutant Emissions (tons)					
	CO	NO ₂	PM ₁₀	PM _{2.5}	SO ₂	VOC
Construction Equipment	0.81	1.48	0.11	0.11	0.00	0.15
Worker Vehicles	11.83	0.65	0.13	0.08	0.02	0.68
Delivery and Waste Trucks	2.31	2.27	0.24	0.12	0.02	0.18
Fugitive Dust	-	-	29.80	4.71	-	-
Total	14.95	4.40	30.29	5.01	0.04	1.01
<i>De minimis Threshold</i>	100	100	100	70	100	10

Note: CO = carbon dioxide; g = grams; lb = pounds; NO₂ = nitrogen dioxide; PM_{2.5} = particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometers; PM₁₀ = particulate matter with an aerodynamic diameter less than or equal to 10 micrometers; SO₂ = sulfur dioxide; VOC = volatile organic compounds.

CONCLUSION

As shown in Table E-3, none of the criteria pollutant emissions estimated for Alternative 1 would exceed their respective *de minimis* thresholds. Therefore, the General Conformity Rule is not applicable to Alternative 1.

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- USEPA. 2020b. De Minimis Tables. Accessed January 20th, 2020 at <https://www.epa.gov/general-conformity/de-minimis-tables>.
- USEPA. 2015. MOVES2014a User Guide. Publication Number EPA- 420-B-15-095. November 2015. Accessed January 20th, 2020 at <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P100NNCY.pdf>.
- USEPA. 1995. AP-42: Compilation of Air Emissions Factors. Chapter 13: Miscellaneous Sources, Heavy Construction Operations. Accessed January 20th, 2020 at <https://www3.epa.gov/ttn/chief/ap42/ch13/>.

APPENDIX F: DRAFT EIS PUBLIC INVOLVEMENT MATERIALS

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Bancorp, Inc., and thereby indirectly acquire voting shares of Bank of Ann Arbor, both of Ann Arbor, Michigan.

Board of Governors of the Federal Reserve System, July 1, 2020.

Yao-Chin Chao,

Assistant Secretary of the Board.

[FR Doc. 2020-14622 Filed 7-7-20; 8:45 am]

BILLING CODE P

GENERAL SERVICES ADMINISTRATION

[Notice—PBS—2020—06; Docket No. 2020—0002; Sequence No. 23]

Notice of Availability and Announcement of Meeting for the Chet Holifield Federal Building Draft Environmental Impact Statement, Laguna Niguel, California

AGENCY: Public Buildings Service (PBS),
General Services Administration (GSA).

ACTION: Notice of Availability;
Announcement of Meeting.

SUMMARY: This notice announces the availability of the Draft Environmental Impact Statement (DEIS), which examines the potential impacts of a proposal by the General Services Administration (GSA) to address long-term housing for the tenants of the Chet Holifield Federal Building (CHFHB). The building is owned and managed by GSA and is occupied by various federal agency tenants, with the United States Citizenship and Immigration Services (USCIS) serving as the largest tenant. The DEIS describes the reason the project is being proposed, the alternatives being considered, the potential impacts of each of the alternatives on the existing environment, and avoidance, minimization, and/or mitigation measures related to those alternatives. GSA is serving as the lead agency in this undertaking, and acting on behalf of its tenants at this facility.

DATES: GSA will hold a virtual public meeting for the DEIS on Tuesday, August 4, 2020 from 4:00 p.m. to 6:00 p.m., Pacific Time (PT). Interested parties are encouraged to join and provide comments on the DEIS. The public comment period for the DEIS ends Friday, September 4, 2020. After this date, GSA will prepare the Final EIS.

ADDRESSES: Comments will be accepted during the meeting, by mail, and by email. Questions or comments concerning the DEIS should be directed to:

- *Email: osmahn.kadri@gsa.gov.*

- *Postal Mail/Commercial Delivery:* Potomac-Hudson Engineering, Inc., ATTN: CHFHB Draft EIS, 77 Upper Rock Circle Suite 302, Rockville, MD 20850. All comments received written or oral will become public and part of the Administrative Record.

Further information, including an electronic copy of the DEIS, may be found online on the following website: <https://www.gsa.gov/ChetHNEPA>.

FOR FURTHER INFORMATION CONTACT:

Osmahn A. Kadri, Regional Environmental Quality Advisor/NEPA Project Manager, GSA, at 415-522-3617. Please also call this number if special assistance is needed to attend and participate in the public meeting.

SUPPLEMENTARY INFORMATION: The CHFHB is located on a 92-acre site in Laguna Niguel, California, between Los Angeles and San Diego, and approximately 4 miles from the Pacific Ocean coastline. Construction of the building was completed in 1971 by the Aerospace and Systems Group of North American Rockwell Corporation, although it was never occupied by them. The building and site were transferred to the Federal Government in March of 1974. Since that time the CHFHB has been utilized as office space for government agencies. The USCIS is currently the largest tenant in the CHFHB, with 12 other agencies also currently located the building. There are currently approximately 3,000 employees working in the building.

The purpose of the Proposed Action is to accommodate the long-term office space requirements for the current tenants located at the CHFHB that would meet applicable building code, accessibility, and security standards. The purpose is also to make such accommodations primarily within the Orange County, California market in a cost-effective manner that would minimize personnel relocations and disruptions to the federal tenants and their agency missions.

The project is needed because the current working space does not meet GSA's current federal building, accessibility, and security standards. There have been no modifications to the CHFHB since the 1980s, other than some energy-related modifications. Most of the building's infrastructure is beyond its useful life and deficiencies have been documented in all major mechanical and electrical systems, including life-safety, fire protection, and fire sprinkler systems. Additionally, numerous issues exist, including the presence of asbestos containing materials and the need to improve the building's response to future seismic events.

The DEIS considers two "action" alternatives and one "no action" alternative. One action alternative consists of relocation of current tenants into lease space primarily throughout the Orange County, California market. Some tenants may be relocated outside of Orange County. The existing CHFHB and surrounding government property would be reported as excess and turned over to the GSA Real Property Utilization Disposal Division for disposal.

The other action alternative consists of construction of a new federal office building directly south of the CHFHB on a 27.15-acre portion of the existing 92-acre site for the USCIS, and relocating all other tenants into lease space primarily within the Orange County market. The existing building and the remainder of the property not retained for construction of the new federal office building (approximately 64.85 acres) would be turned over to the GSA Real Property Utilization Disposal Division for disposal.

Future development of the site is not part of GSA's Proposed Action, nor would it be within the control of GSA. If the property remains in federal ownership following disposal out of GSA ownership, the appropriate level of NEPA analysis would be required by a future federal proponent. If the property is transferred out of federal ownership, the City of Laguna Niguel would require the new owner to complete the appropriate level of documentation under the California Environmental Quality Act (CEQA), and all necessary land use approvals would be issued for any proposed future use of the site. Development of the site and compliance with all federal, state, and local laws and regulations would be the responsibility of the future landowner, not GSA.

The "no action" alternative assumes that tenants would remain within the existing CHFHB and no new construction or relocation would occur. Minor repairs would occur as needed and maintenance and operation of the existing facilities would continue.

Public Comments: GSA will host a virtual public meeting during the public comment period as listed under **DATES** to solicit public comment. The purpose of the meeting is to collect public comments on the DEIS. The virtual public meeting will begin with presentations on the National Environmental Policy Act (NEPA) process and the proposed project. A copy of the presentation slideshow will be made available prior to the meeting at <https://www.gsa.gov/ChetHNEPA>.

Following the presentations, there will be a moderated session during which members of the public can provide oral comments on the DEIS. Commenters will be allowed three minutes to provide comments. Comments will be recorded. Refer to the end of this notice for instructions on how to access the online public meeting.

Virtual Public Meeting Information: Members of the public may join the DEIS public meeting by entering the following information—Meeting ID: 986 1911 2163; Password: CHFBEIS, using any of the below methods. Note that the meeting is best viewed through the Zoom app, and attendees are encouraged to download the app at the Zoom website (<https://zoom.us>) or on their mobile device, and test their connection prior to the meeting to ensure best results.

- From their personal computer by launching the Zoom app (if already installed), and clicking 'Join a Meeting' and entering the above Meeting ID and Password. Attendees should follow the prompts to input their name and email address to access the meeting.

- From their personal computer, by going to the Zoom website at <http://zoom.us/join>, entering the Meeting ID and Password, and following the prompts to download and install the Zoom app.

- From their mobile device through the Zoom mobile app, by entering the above Meeting ID and Password.

- For attendees who do not have the Zoom app or do not wish to download the app, visit <http://zoom.us/join> using your computer's browser, enter the Meeting ID, and click the 'Join from your browser' link that is displayed on the landing page. Then, follow the prompts to enter your name and the meeting Password.

Whether joining through the Zoom app or web browser, attendees should follow the prompts to connect their computer audio. Attendees are encouraged to connect through the 'Computer Audio' tab and click 'Join Audio by Computer' under the 'Join Audio' button on the bottom of their screen. Users who do not have a computer microphone and wish to provide public comment during the meeting may connect by following the prompts under the 'Phone Call' tab under the 'Join Audio' button.

For members of the public who do not have access to a personal computer, they may join the meeting audio by dialing the following number: 669-900-9128. When prompted, enter the following information: Meeting ID—986 1911 2163, followed by the pound (#)

key; press pound (#) again when prompted for a participant ID; then enter Password—629071 followed by the pound (#) key. Note, dialing in to the meeting is only necessary if you are not accessing the meeting through your computer or mobile app, or if you would like to provide oral comments during the meeting but do not have a computer microphone. The public meeting will be recorded, and all comments provided will become part of the formal record.

Jared Bradley,

*Director, Portfolio Management Division,
Pacific Rim Region, Public Buildings Service.*

[FR Doc. 2020-14710 Filed 7-7-20; 8:45 am]

BILLING CODE 6820-YF-P

DEPARTMENT OF HEALTH AND HUMAN SERVICES

Centers for Medicare & Medicaid Services

[Document Identifier CMS-R-153]

Agency Information Collection Activities: Proposed Collection; Comment Request

AGENCY: Centers for Medicare & Medicaid Services, HHS.

ACTION: Notice.

SUMMARY: The Centers for Medicare & Medicaid Services (CMS) is announcing an opportunity for the public to comment on CMS' intention to collect information from the public. Under the Paperwork Reduction Act of 1995 (the PRA), federal agencies are required to publish notice in the **Federal Register** concerning each proposed collection of information (including each proposed extension or reinstatement of an existing collection of information) and to allow 60 days for public comment on the proposed action. Interested persons are invited to send comments regarding our burden estimates or any other aspect of this collection of information, including the necessity and utility of the proposed information collection for the proper performance of the agency's functions, the accuracy of the estimated burden, ways to enhance the quality, utility, and clarity of the information to be collected, and the use of automated collection techniques or other forms of information technology to minimize the information collection burden.

DATES: Comments must be received by September 8, 2020.

ADDRESSES: When commenting, please reference the document identifier or OMB control number. To be assured consideration, comments and

recommendations must be submitted in any one of the following ways:

1. *Electronically.* You may send your comments electronically to <http://www.regulations.gov>. Follow the instructions for "Comment or Submission" or "More Search Options" to find the information collection document(s) that are accepting comments.

2. *By regular mail.* You may mail written comments to the following address: CMS, Office of Strategic Operations and Regulatory Affairs, Division of Regulations Development, Attention: Document Identifier/OMB Control Number _____, Room C4-26-05, 7500 Security Boulevard, Baltimore, Maryland 21244-1850.

To obtain copies of a supporting statement and any related forms for the proposed collection(s) summarized in this notice, you may make your request using one of following:

1. Access CMS' website address at website address at <https://www.cms.gov/Regulations-and-Guidance/Legislation/PaperworkReductionActof1995/PRA-Listing.html>.

2. Email your request, including your address, phone number, OMB number, and CMS document identifier, to Paperwork@cms.hhs.gov.

3. Call the Reports Clearance Office at (410) 786-1326.

FOR FURTHER INFORMATION CONTACT: William N. Parham at (410) 786-4669.

SUPPLEMENTARY INFORMATION:

Contents

This notice sets out a summary of the use and burden associated with the following information collections. More detailed information can be found in each collection's supporting statement and associated materials (see **ADDRESSES**).

CMS-R-153 Medicaid Drug Use Review (DUR) Program

Under the PRA (44 U.S.C. 3501-3520), federal agencies must obtain approval from the Office of Management and Budget (OMB) for each collection of information they conduct or sponsor. The term "collection of information" is defined in 44 U.S.C. 3502(3) and 5 CFR 1320.3(c) and includes agency requests or requirements that members of the public submit reports, keep records, or provide information to a third party. Section 3506(c)(2)(A) of the PRA requires federal agencies to publish a 60-day notice in the **Federal Register** concerning each proposed collection of information, including each proposed extension or reinstatement of an existing collection of information, before

ENVIRONMENTAL PROTECTION AGENCY

[ER-FRL-9051-8]

Environmental Impact Statements; Notice of Availability

Responsible Agency: Office of Federal Activities, General Information 202-564-5632 or <https://www.epa.gov/nepa>.

Weekly receipt of Environmental Impact Statements (EIS)

Filed July 6, 2020, 10 a.m. EST Through July 13, 2020, 10 a.m. EST

Pursuant to 40 CFR 1506.9.

Notice

Section 309(a) of the Clean Air Act requires that EPA make public its comments on EISs issued by other Federal agencies. EPA's comment letters on EISs are available at: <https://cdxnodengn.epa.gov/cdx-enepa-public/action/eis/search>.

EIS No. 20200137, Final, USFS, OR, Shasta Agness Landscape Restoration Project, Review Period Ends: 08/31/2020, Contact: Michelle Calvert 541-471-6788.

EIS No. 20200140, Final, FERC, CA, Don Pedro Hydroelectric Project and La Grange Hydroelectric Project, Review Period Ends: 08/17/2020, Contact: Office of External Affairs 866-208-3372.

EIS No. 20200141, Final Supplement, USAF, TT, Tinian Divert Infrastructure Improvements, Commonwealth of the Northern Mariana Islands, Review Period Ends: 08/17/2020, Contact: Julianne Turko 210-925-3777.

EIS No. 20200142, Draft, GSA, CA, Chet Holifield Federal Building, Comment Period Ends: 08/31/2020, Contact: Osmahn Kadri 415-522-3617.

EIS No. 20200143, Final, USACE, IL, Chicago Area Waterway System Dredged Material Management Plan, Review Period Ends: 08/17/2020, Contact: Alex Hoxsie 312-846-5587.

EIS No. 20200144, Draft, MARAD, CA, Port of Long Beach Pier B On-Dock Rail Support Facility Project, Comment Period Ends: 08/31/2020, Contact: Alan Finio 202-366-8024.

EIS No. 20200145, Final, NOAA, FL, Coral Reef Conservation Program Final Programmatic Environmental Impact Statement, Review Period Ends: 08/17/2020, Contact: Elizabeth Fairey 301-427-8632.

Amended Notice

EIS No. 20200112, Draft, USACE, FL, Miami-Dade Back Bay Coastal Storm Risk Management Draft Integrated Feasibility Report and Programmatic

Environmental Impact Statement, Comment Period Ends: 08/19/2020, Contact: Justine Woodward 757-201-7728.

Revision to FR Notice Published 6/5/2020; Extending the Comment Period from 7/20/2020 to 8/19/2020.

Dated: July 13, 2020.

Cindy S. Barger,
Director, NEPA Compliance Division, Office of Federal Activities.

[FR Doc. 2020-15444 Filed 7-16-20; 8:45 am]

BILLING CODE 6560-50-P

ENVIRONMENTAL PROTECTION AGENCY

[10011-54-Region 5]

Proposed Prospective Purchaser Agreement for a Portion of the Delco Chassis Industrial Land I & II Site in Livonia, Michigan

AGENCY: Environmental Protection Agency (EPA).

ACTION: Notice; request for public comment.

SUMMARY: In accordance with the Prospective Purchaser Agreement, notice is hereby given of a proposed administrative settlement concerning a portion of the Delco Chassis Industrial Land I & II Site (Property) in Livonia, Michigan with the following Settling Party: Livonia West Commerce Center 2, LLC. The settlement requires the Settling Party to, if necessary, execute and record a Declaration of Restrictive Covenant; provide EPA access to the Property, exercise due care with respect to existing contamination on the Property, and not interfere with the ongoing environmental work at the Property that is being conducted by the Revitalizing Auto Communities Environmental Response (RACER) Trust.

DATES: Comments must be submitted on or before August 17, 2020.

ADDRESSES: The proposed settlement is available for public inspection at the EPA, Region 5, Records Center, 77 W Jackson Blvd., 7th Fl., Chicago, Illinois 60604. A copy of the proposed settlement may be obtained from Peter Felitti, Assoc. Regional Counsel, EPA, Office of Regional Counsel, Region 5, 77 W Jackson Blvd., mail code: C-14J, Chicago, Illinois 60604. Comments should reference the Delco Chassis Industrial Land I & II Site in Livonia, Michigan and should be addressed to Peter Felitti, Assoc. Regional Counsel, EPA, Office of Regional Counsel, Region 5, 77 W Jackson Blvd., mail code: C-14J, Chicago, Illinois 60604.

FOR FURTHER INFORMATION CONTACT:

Peter Felitti, Assoc. Regional Counsel, EPA, Office of Regional Counsel, Region 5, 77 W Jackson Blvd., C-14J, Chicago, Illinois 60604 or (312) 886-5114.

SUPPLEMENTARY INFORMATION: The settlement includes a covenant not to sue the Settling Party pursuant to the Sections 106 and 107(a) of the Comprehensive Environmental Response, Compensation, and Liability Act, or the Resource Conservation and Recovery Act, with respect to the Existing Contamination at the Property. Existing Contamination is defined as any hazardous substances, pollutants, contaminants or Waste material: (1) Present or existing on or under the Property as of the Effective Date of the Settlement Agreement; (2) that migrated from the Property prior to the Effective Date of the Settlement Agreement; and (3) presently at the Property that migrates onto, on, under, or from the Property after the Effective Date of the Settlement Agreement. For thirty (30) days following the date of publication of this notice, the Agency will receive written comments relating to the settlement. The Agency will consider all comments received and may modify or withdraw its consent to the settlement if comments received disclose facts or considerations which indicate that the settlement is inappropriate, improper, or inadequate. The Agency's response to any comments will be available for public inspection at the EPA, Region 5, Records Center, 77 W Jackson Blvd., 7th Fl., Chicago, Illinois 60604. Commenters may request an opportunity for a public hearing in the affected area, pursuant to Section 7003(d) of RCRA.

The Settling Party proposes to acquire ownership of a portion of the Delco Chassis Industrial Land I & II Site in Livonia, Michigan. The Site is one of the 89 sites that were placed into an Environmental Response Trust (the "Trust") administered by RACER as a result of the resolution of the 2009 GM bankruptcy.

Douglas Ballotti,

Director, Superfund & Emergency Management Division.

[FR Doc. 2020-15015 Filed 7-16-20; 8:45 am]

BILLING CODE 6560-50-P

FEDERAL RESERVE SYSTEM**Change in Bank Control Notices; Acquisitions of Shares of a Bank or Bank Holding Company**

The notificants listed below have applied under the Change in Bank Control Act (Act) (12 U.S.C. 1817(j)) and

The Orange County Register

2190 S. Towne Centre Place Suite 100
Anaheim, CA 92806
714-796-2209

5196797

POTOMAC-HUDSON ENGINEERING, INC.
5030 CAMINO DEL LA SIESTA, STE 320
SAN DIEGO, CA 92108

AFFIDAVIT OF PUBLICATION

STATE OF CALIFORNIA, }
County of Orange } **SS.**

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the principal clerk of The Orange County Register, a newspaper of general circulation, published in the city of Santa Ana, County of Orange, and which newspaper has been adjudged to be a newspaper of general circulation by the Superior Court of the County of Orange, State of California, under the date of November 19, 1905, Case No. A-21046, that the notice, of which the annexed is a true printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

07/12/2020, 08/02/2020

I certify (or declare) under the penalty of perjury under the laws of the State of California that the foregoing is true and correct:

Executed at Anaheim, Orange County, California, on
Date: August 02, 2020.



Signature

PROOF OF PUBLICATION

Legal No. **0011396846**

Notice of Availability for the Chet Holifield Federal Building (CHFB) Tenant Relocation Draft Environmental Impact Statement (EIS), Laguna Niguel, California

SUMMARY: This notice announces the availability of the Draft EIS, which examines the impacts of a proposal by the General Services Administration (GSA) to relocate the tenants of the CHFB. The Draft EIS describes the reason for the project; alternatives considered; potential environmental impacts; and avoidance, minimization, and mitigation measures.

DATES: The comment period for the Draft EIS ends September 4, 2020. After this date, GSA will prepare the Final EIS.

Further information, including an electronic copy of the Draft EIS, may be found online on the following website:
<https://www.gsa.gov/ChetHNEPA>

Questions or comments concerning the Draft EIS should be directed to: Osmahn Kadri via email to osmahn.kadri@gsa.gov or phone at (415) 522-3617. Comments may also be sent to:

Potomac-Hudson Engineering, Inc.
ATTN: CHFB Draft EIS
77 Upper Rock Circle Suite 302
Rockville, MD 20850

VIRTUAL PUBLIC MEETING: A virtual public meeting for the Draft EIS will be held on Tuesday, August 4, 2020 from 4 to 6 PM PDT. Members of the public may join the public meeting from their personal computer or compatible mobile device through the Zoom

app, clicking 'Join a Meeting', and entering the following information - Meeting ID: 986 1911 2163; Password: CHFB EIS. The Zoom app may also be launched from the Zoom website at <http://zoom.us/join>, entering the Meeting ID, and following the prompts. For members of the public who do not have access to a personal computer, they may join the meeting audio by dialing the following number: 669-900-9128. When prompted, enter the following information: Meeting ID - 986 1911 2163; Password - 629071. Then press the pound (#) key.

Further instructions for accessing the public meeting can be found at <https://www.gsa.gov/ChetHNEPA>. Attendees are encouraged to review the instructions prior to attending the meeting to ensure best results.

The virtual public meeting will begin with a presentation on the NEPA process and the proposed project. Following the presentation, there will be a moderated session during which members of the public can provide oral comments on the Draft EIS. The public meeting will be recorded, and all comments provided will become part of the formal record.

Please call Osmahn Kadri, NEPA Project Manager, GSA at (415) 522-3617 if special assistance is needed to participate in the virtual public meeting.



July 8, 2020

Dear Interested Reader,

Please be advised that the Draft Environmental Impact Statement (EIS) examining the potential impacts of a proposal by the General Services Administration (GSA) to relocate the tenants of the Chet Holifield Federal Building (CHFB) is now available. The Draft EIS describes the reason for the project; alternatives considered; potential environmental impacts; and avoidance, minimization, and mitigation measures.

An electronic copy of the Draft EIS, may be found online on the following website: <https://www.gsa.gov/ChetHNEPA>. Questions or comments concerning the Draft EIS should be directed to: Osmahn Kadri via email to osmahn.kadri@gsa.gov or phone at (415) 522-3617. Comments may also be sent to:

Potomac-Hudson Engineering, Inc.
ATTN: CHFB Draft EIS
77 Upper Rock Circle Suite 302
Rockville, MD 20850

The comment period for the Draft EIS ends Friday, September 4, 2020. After this date, GSA will prepare the Final EIS.

SUPPLEMENTAL INFORMATION: The CHFB is owned by GSA and is home to twelve federal agency tenants, with the United States Citizenship and Immigration Services (USCIS) serving as the largest tenant. The CHFB is located on a 92-acre site in Laguna Niguel, California, between Los Angeles and San Diego, and approximately 4 miles from the Pacific Ocean coastline. Construction of the building was completed in 1971 by the Aerospace and Systems Group of North American Rockwell Corporation, although it was never occupied by them. The building and site were transferred to the Federal Government in March of 1974. Since that time the CHFB has been utilized as office space for government agencies. There are currently approximately 3,000 employees working in the building.

The project is needed because the working space does not meet GSA's current federal building, accessibility, and security standards. There are numerous documented deficiencies in major mechanical and electrical systems, as well as the presence of asbestos containing materials and the need to improve the building's response to future seismic events.

The EIS considers two "**action**" alternatives and one "**no action**" alternative. The two "**action**" alternatives are described as follows:

- Alternative 1 would involve construction of a new federal office building for the USCIS within the existing 92-acre site, directly adjacent to the existing CHFB, and relocating all other tenants into lease space primarily within the Orange County market. The existing building and the remainder of the property not retained for construction of the USCIS building would be turned over to the GSA Real Property Utilization Disposal Division.
- Alternative 2 would involve relocation of all tenants primarily within Orange County similar to as under Alternative 1, but to also include a new location for USCIS outside of the



existing CHFB property. The existing CHFB and surrounding government property would be turned over to the GSA Real Property Utilization Disposal Division.

The “no action” alternative is included and analyzed to provide a baseline for comparison with impacts from the project and also to satisfy federal requirements for analyzing “no action” under the National Environmental Policy Act (NEPA) (40 Code of Federal Regulations [CFR] 1502.14(d)). The “no action” alternative assumes that tenants would remain within the existing CHFB and no new construction or relocation would occur. Minor repairs would occur as needed and maintenance and operation of the existing facilities would continue.

VIRTUAL PUBLIC MEETING: A virtual public meeting for the Draft EIS will be held on Tuesday, August 4, 2020 from 4 to 6 PM PDT. Members of the public may join the public meeting from their personal computer or compatible mobile device through the Zoom app, clicking ‘Join a Meeting’, and entering the following information - Meeting ID: 986 1911 2163; Password: CHFBEIS. The Zoom app may also be launched from the Zoom website at <http://zoom.us/join>, entering the Meeting ID, and following the prompts. For members of the public who do not have access to a personal computer, they may join the meeting audio by dialing the following number: 669-900-9128. When prompted, enter the following information: Meeting ID – 986 1911 2163; Password – 629071. Then press the pound (#) key.

Further instructions for accessing the public meeting can be found at <https://www.gsa.gov/ChetHNEPA>. Attendees are encouraged to review the instructions prior to attending the meeting to ensure best results.

The virtual public meeting will begin with a presentation on the NEPA process and the proposed project. Following the presentation, there will be a moderated session during which members of the public can provide oral comments on the Draft EIS. The public meeting will be recorded, and all comments provided will become part of the formal record.

Please call Osmahn Kadri, NEPA Project Manager, GSA at (415) 522-3617 if special assistance is needed to participate in the virtual public meeting.

GSA

Welcome to the Virtual Public Meeting for the
Chet Holifield Federal Building (CHFB)
Tenant Relocation
Draft Environmental Impact Statement (EIS)
August 4th, 2020

TO CONNECT YOUR AUDIO:

Click 'Join with Computer Audio' or 'Join Audio by Computer' on the screen that pops up when you enter the meeting. Or, click the 'Join Audio' button on the bottom left hand corner of the Zoom window and follow the prompts to join with Computer Audio.

If you do not hear anyone speaking after 2 minutes, click 'Test Speaker and Microphone' under 'Join Audio' and follow the prompts to determine if your computer is compatible with the 'Computer Audio' feature.

If your computer is not compatible for audio, you can connect with your phone by dialing the following number: 669-900-9128, and entering the following information, making sure to press the pound or # key after each step:

Meeting ID: 986 1911 2163; **Attendee ID:** Not required (just press # to continue); **Password:** 629071.

Note: Use of vulgar or crass language at any point during the meeting will result in removal.

TECHNICAL SUPPORT:

If you are experiencing technical issues, please visit <http://support.zoom.us> and click the '**CONTACT SUPPORT**' link at the top right-hand side of the page.

1

2

GSA

Meeting Agenda



- Welcome
- Review of National Environmental Policy Act (NEPA) requirements and the EIS Process
- Current Timeline
- Review of GSA's Project
- Summary of Draft EIS Findings
- Next Steps
- Public Comment Session

2

What is the Purpose of This Meeting?



- Provide an overview of GSA's project and discuss the findings of the Draft EIS.
- Give the public an opportunity to provide comments on the Draft EIS.
- Inform the public of next steps in the planning process.

3

What is NEPA?



NEPA requires that federal agencies consider the potential impacts to the human and natural environment of proposed federal actions.



GSA has prepared a Draft EIS under NEPA to document potential impacts from implementation of the Proposed Action.



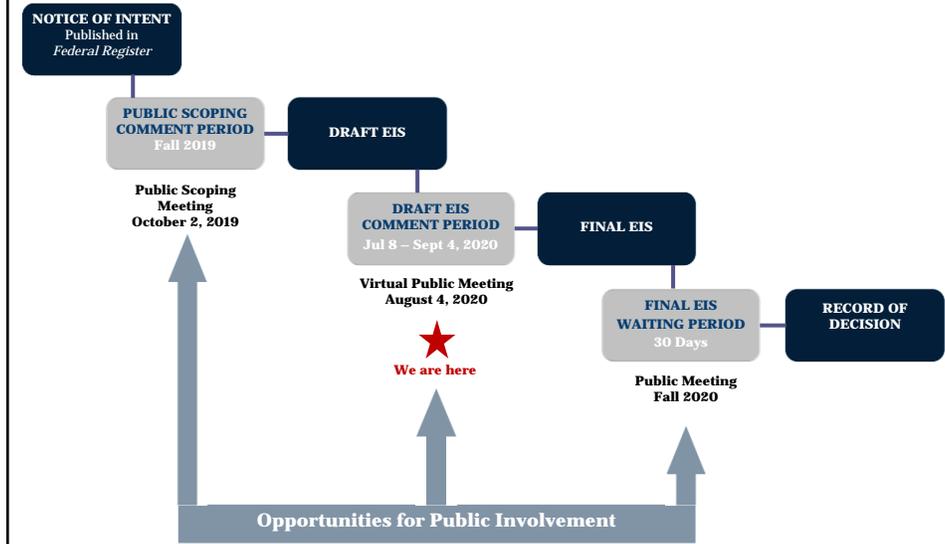
NEPA provides the public with opportunities to comment on the findings of the Draft EIS.



GSA will review all comments and consider substantive comments in the preparation of the Final EIS.

4

Project Timeline



5

Project Background

- CHF B was built in 1970 by the Aerospace and Systems Group of North American Rockwell Corporation. It was never occupied and was transferred to the federal government in 1974.
- The CHF B is owned by GSA and includes:
 - 12 federal agency tenants
 - ~3,000 workers
 - United States Citizenship and Immigration Services (USCIS) is largest tenant (~2,000 workers)
- Building is ~1 million square feet and located on an 86.5-acre parcel. A 5.5-acre parcel containing utility equipment is located north of Avila Road.
- GSA is considering alternatives to relocate tenants offsite and dispose of the CHF B.

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Regional Location



The CHFB is located in Laguna Niguel between Los Angeles and San Diego, ~4 miles from the Pacific coastline, in a high-value real estate suburban area comprised of retail and residential zones.

Existing CHFB Site



Purpose and Need for Project



Purpose: Accommodate the long-term office space requirements for the current tenants located at the CHFB that would meet applicable building code, accessibility, and security standards.



Need: The current working space does not meet GSA's building, accessibility, and security standards.

9

Project Alternatives

The Draft EIS considers two “**action**” alternatives and the “**no action**” alternative:

- **Alternative 1 would include:**
 - Construction of new federal building for USCIS only on the existing parcel directly adjacent to the CHFB.
 - Relocation of remaining tenants (~1,000 workers) into lease space primarily within Orange County.
 - Existing building and the remainder of the property not retained for construction would be disposed.

10

Project Alternatives (cont.)

- **Alternative 2 would include:**
 - Relocation of all tenants (~3,000 workers) primarily within Orange County similar to under Alternative 1.
 - Would also include a new lease location for USCIS outside of the existing CHF B property.
 - The CHF B and surrounding government property would be disposed.
 - No new construction would occur.
- **The “no action” alternative would include:**
 - Tenants would remain within the existing CHF B.
 - No new construction or relocation would occur.
 - Minor repairs would occur as needed and maintenance and operation of the existing facilities would continue.

11

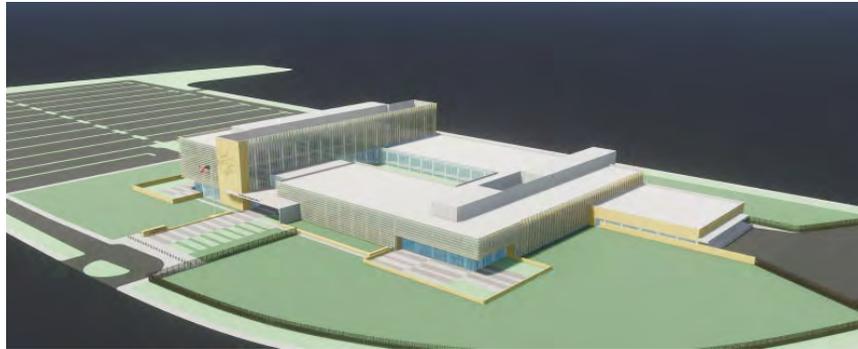
Alternative 1 Proposed Site Layout



Note: Under Alternative 2, the entire site would be disposed.

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Alternative 1 Rendering of New USCIS Building



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Future Development of CHFB Site

- Future development of the CHFB site following disposal **is not part of GSA's Proposed Action**, nor would it be within the control of GSA.
- There are two general outcomes of property disposal:
 - Property remains in federal ownership by another federal entity (i.e., other than GSA).
 - Property is transferred out of federal ownership (e.g., to state, local, or private ownership).

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Future Development of CHFB Site (cont.)

- Under either scenario, ***the public would have additional opportunities to provide public comment on future use of the site***, once development plans have been proposed.
 - Future federal owner – additional NEPA analysis would be required.
 - Future non-federal owner – The appropriate level of analysis under the California Environmental Quality Act (CEQA) would be required, and all necessary land use approvals would be issued for any proposed future use of the site.

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Future Development of CHFB Site (cont.)

- The EIS considers impacts generally from a future development of the site (i.e., renovation, new construction, and infill development) as no plans currently exist for development and a future landowner is not known.
- Potential future development of the site and compliance with all federal, state, and local laws and regulations would be the responsibility of the future landowner, not GSA.
- Refer to the EIS for discussion of potential impacts from future development.

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Alternatives Considered but Dismissed

Four alternatives were considered but dismissed because they did not meet the Purpose and Need for the Proposed Action:

Repair and Alteration of the CHFB

Three different alternatives to repair and alteration of the CHFB were considered. These alternatives were dismissed due to lengthy construction periods (approximately 9 years), and the need to perform construction while tenants remained in the building, which would be disruptive to operations and affect each agency's ability to meet their mission objectives. Some of these alternatives were cost prohibitive or would continue to not meet certain federal building requirements.

New Construction for All Tenants

An alternative for construction of a new federal building to house all current CHFB tenants on site was considered. This alternative was determined not viable due to excessively high upfront capital costs that prohibited funding in the current budget environment.

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EIS Findings

	Alternative 1 (New USCIS Building + Leasing)	Alternative 2 (Relocation of All Tenants)
Cultural Resources	Significant	Significant
Socioeconomics	Moderate	Moderate to Significant
Air Quality and Greenhouse Gases	Less than Significant	Less than Significant
Geology/Soils	Minor	No Impact
Land Use	Minor	No Impact
Visual Resources/Aesthetics	Minor to Moderate	No Impact
Water Resources	Minor	No Impact
Biological Resources	Minor	No Impact
Transportation and Traffic	Less than Significant	Less than Significant
Hazardous Waste and Materials	Minor	Minor
Noise	Less than Significant	Less than Significant
Environmental Justice	Minor to Moderate	Minor to Moderate
Utilities and Infrastructure	Minor	Minor Beneficial

Note: These impacts are only from GSA's action to construct a new USCIS building and relocate 1,000 workers outside of Laguna Niguel (Alternative 1) or relocate all tenants out of the CHFB (Alternative 2). The table does not include impacts from future development. Refer to the Draft EIS for discussion of impacts from potential future development.

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EIS Findings Summary



Alternative 1 would include construction by GSA, which could have minor, temporary impacts on the nearby natural environment (e.g., soils, water resources, biological resources). There would also be temporary noise, traffic, and air emissions which could affect nearby land uses and residences in the short term. Construction of a new building would result in long term, moderate changes to visual landscape.



Alternative 2 would not include construction and would not affect the natural environment or nearby land uses or residences.



There could be moderate (**Alt. 1**) to significant (**Alt. 2**) economic impacts from relocation of workers outside of Laguna Niguel, although under both alternatives, tenants' place of work is expected to remain primarily in Orange County, and workers are not expected to relocate their place of residence. Future development of the CHFB site would likely offset local job losses in Laguna Niguel in the long term.



Workers may need to change commuting patterns under both alternatives, which could lead to either an increase or decrease in travel time and air emissions depending on final lease location and worker residence. No net new trips are expected from GSA's action.

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Section 106 Process

- Section 106 of the National Historic Preservation Act (NHPA) requires GSA to evaluate potential effects on properties listed or eligible for listing in the National Register of Historic Places (NRHP) prior to an undertaking (e.g., disposing of the CHFB site, new construction).
- The CHFB was determined eligible for the NRHP, due to the rarity of its architectural style and its association with master architect, William Pereira.
- Under Alternative 1, there would be:
 - Adverse effects under NHPA from partial demolition of the landscaping and site plan.
 - Visual impacts related to the loss of views to and from the historic property.
- Under Alternatives 1 and 2, potential disposal of the historic property out of federal ownership would constitute an adverse effect when done without adequate and legally enforceable restrictions to ensure long-term preservation.

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Section 106 Process (cont.)

- To avoid effects on the historic property, the transfer could include specific deed restrictions/covenants and/or easements.
- These requirements would ensure future projects that would potentially affect the resource be done in compliance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*.
- GSA is currently undergoing Section 106 consultation with the State Historic Preservation Officer (SHPO), including to determine the need for any deed restrictions/covenants and/or easements.
- Consultation will be completed prior to signature of the ROD.

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CHFB Landscape



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CHFB Landscape (cont.)



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Next Steps



A Notice of Availability was published in the *Federal Register* on July 8, 2020 to start the public comment period.



The public comment period ends September 4, 2020.



The Final EIS will be prepared after public comments received on the Draft EIS have been considered and formally addressed. The Final EIS will be made publicly available for a minimum of 30 days.



An additional public meeting will be held during the waiting period on the Final EIS.



GSA will make its decision in a Record of Decision (ROD) and announce the ROD availability in the *Federal Register*.



Project updates available at <https://www.gsa.gov/ChetHNEPA>

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Public Comment

Written comments can be submitted by the two means below prior to the end of the public comment period:

- By email to: osmahn.kadri@gsa.gov
- By phone at: 415-760-9239
- By mail to (must be postmarked by September 4, 2020):

Potomac-Hudson Engineering, Inc.
ATTN: CHFB Draft EIS
77 Upper Rock Circle, Suite 302
Rockville, MD 20850

Written and verbal comments may be provided tonight.

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Commenting Session

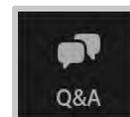
Raise Your Hand to Request to Speak

1. Click 'Raise Hand' icon on the bottom of screen. For those accessing audio by phone, dial *9.
2. Wait to be unmuted by the Host.
3. State your **name**, **affiliation**, and **city of residence** for the record.



Submit a Written Comment or Question

1. Click 'Q&A' icon on the bottom of screen.
2. Type your Comment or Question.
3. Click Send.



- Please limit verbal comments to no more than **3 minutes**. Reminder will be provided at 2.5 minutes, and commenters will be muted if they continue to speak past their allotted limit.
- If you wish to provide detailed comments, please summarize your views within the allotted time and submit additional comments in writing after the meeting.
- If calling in by phone, please avoid using speaker phone to ensure the best audio performance.
- Use of crass or vulgar language during verbal commenting or through the Q&A window will not be tolerated and may result in removal from the meeting.

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Summary

The General Services Administration (GSA) has prepared a Draft Environmental Impact Statement (EIS) analyzing the potential impacts from the proposed alternatives to address how to accommodate tenants of the Chet Holifield Federal Building (CHFBI). The CHFBI is owned by GSA and is home to various federal agency tenants, with the United States Citizenship and Immigration Services (USCIS) serving as the largest tenant.

Project Background

The CHFBI is located in Laguna Niguel, California, between Los Angeles and San Diego. The building is approximately 1 million square feet in size and is located on an 86.5-acre parcel. An associated 5.5-acre parcel containing a central utility plant for the building is located north of Avila Road. The 92 acres of property is located in a high value real estate suburban area comprised of retail and residential zones and is primarily used for federal office space. The building was originally built in 1970 by the Aerospace and Systems Group of North American Rockwell Corporation. It was never occupied and was transferred to the federal government for use by federal agencies in March of 1974.

Proposed Alternatives

The Draft EIS considers two **“action” alternatives** and one **“no action” alternative**. The two **“action” alternatives** are described as follows:

- Alternative 1 would involve construction of a new federal office building within the 86.5-acre parcel, directly adjacent to the existing CHFBI for the USCIS and relocating all other tenants into lease space primarily within the Orange County market. The existing building and the remainder of the property not retained for construction of the USCIS building would be turned over to the GSA Real Property Utilization Disposal Division for disposal.
- Alternative 2 would involve relocation of all tenants primarily within Orange County similar to as under Alternative 1, but to also include a new location for USCIS outside of the existing CHFBI property. The existing CHFBI and surrounding government property would be turned over to the GSA Real Property Utilization Disposal Division for disposal.

The **“no action” alternative** assumes that tenants would remain within the existing CHFBI and no new construction or relocation would occur. Minor repairs would occur as needed and maintenance and operation of the existing facilities would continue.

Future development of the CHFBI site is not part of GSA's Proposed Action, nor would it be within the control of GSA. If the property remains in federal ownership following disposal out of GSA ownership, the appropriate level of analysis under the National Environmental Policy Act would be required by a future federal proponent. If the property is transferred out of federal ownership, the City of Laguna Niguel would require the new owner to complete the appropriate level of documentation under the California Environmental Quality Act (CEQA), and all necessary land use approvals would be issued for any proposed future use of the site. Under either scenario, the public would have additional opportunities to provide public comment on future use of the site, once development plans have been proposed. Development of the site and compliance with all federal, state, and local laws and regulations would be the responsibility of the future landowner, not GSA.





Figure 1. Proposed Project Location and Alternative 1

National Environmental Policy Act (NEPA) Process

We are currently in the Draft EIS phase of the NEPA Process. Scoping comments were previously solicited during the Scoping Process and have been incorporated into the Draft EIS. Public comments on the Draft EIS are encouraged. Following the end of the public comment period, GSA will address comments and prepare the Final EIS.



Public Comments

Public comments on the Draft EIS may be submitted by email or mail and must be received by close of the 60-day public comment period.

- By email, send to osmahn.kadri@gsa.gov. Please reference the Chet Holifield Federal Building EIS in the subject line.
- By mail, send to:

Potomac-Hudson Engineering, Inc.
 ATTN: CHFB Draft EIS
 77 Upper Rock Circle Suite 302
 Rockville, MD 20850

For further information, please contact Osmahn Kadri, NEPA Project Manager, General Services Administration at (415) 522-3617.

Draft EIS Virtual Public Meeting Attendee List

First Name	Last Name
Mark	Mountford
Ryan	Aeh
Stephanie	Winstead, Esq.
Laura	Rocha
Dianne	Dodge
B.	Sadeghi
Erica	Roess
Megan	Emami
Eric	Higuchi
Chris	
Kim	
Stephanie	Oddo
Jennifer	
David	Haase
Robert	Wilson
Michael	McDonald
Corene	
Rischi	Paul Sharma
7 unidentified callers.	
1 unidentified user.	

APPENDIX G: DRAFT EIS COMMENT RESPONSES

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Chet Holifield Federal Building Final Environmental Impact Statement (EIS)

Comments on the Draft EIS

ID: 1-1	Name: Banasha Sadeghi, CIH, CSP, USCIS	Date: 3-Aug-20	Subject: Hazardous Waste and Materials
Comment		Response	
<p>I would like to provide a question and several comments for your attention and records:</p> <ol style="list-style-type: none"> 1. The Chet Holifield Federal Building DEIS draft Environmental Impact statements on GSA site, references the following report: <ul style="list-style-type: none"> • Tectonics. 2017. Asbestos A-E/Environmental Study: Chet Holifield Federal Building Asbestos Removal/Stabilization Project. CA0521SS. May 2017. <p>How can I obtain a copy of this document? GSA has refused to provide a full copy of this final report to USCIS.</p> <ol style="list-style-type: none"> 2. It is my opinion that the asbestos section of this draft report lacks transparency and downplays the significant risks present from asbestos and the subsequent mitigation required for any of the proposed “alternative” outcomes for this site. <ol style="list-style-type: none"> a) The draft EIS does not provide sufficient details such as quantity and type of asbestos containing material (ACM) present in the building, yet that information is readily available and well known by GSA. b) The report does not mention thermal system insulation (TSI) which poses a significant risk since it is friable and found throughout the building. TSI along with fireproofing were banned by EPA in the 70’s, both are friable asbestos and pose significant risk. 		<ol style="list-style-type: none"> 1. The 2017 Facility Asbestos Action Plan (dated December 1, 2017) contains the most accurate and current inventory of asbestos within the CHFEB. References in the EIS has been updated to cite this report. This report is available to the commenter. 2. Section 3.11 of the Final EIS has been revised as follows to address the concerns raised by the commenter: <ol style="list-style-type: none"> a. Added additional details were added about the types, location and amount of asbestos-containing materials present in the CHFEB, in a new table (Table 3.11-1) as well as throughout the text. Text was also added to Section 3.3 regarding air monitoring of asbestos conducted in the CHFEB that demonstrates airborne asbestos levels are below EPA thresholds. b. Text discussing the presence of thermal system insulation (TSI) was added. c. Text was added discussing the presence of asbestos-containing dust above ceiling tiles, and that above-ceiling plenum space is considered a “controlled space” with restricted access. d. References to available newer documents were added, including the December 2017 Facility Asbestos Action Plan. 	

<p>c) Reference to a paragraph on Page 3-81, the report fails to mentions the presence of asbestos containing dust found on top of ceiling tiles on all floors, asbestos dust on ventilation diffusers throughout the building, and ACM debris inside HVAC ducts in 1400/1500. Reference the GSA various databases and MECA and other reports.</p> <p>“Asbestos containing dust has been found in numerous locations at the first floor ceiling space, including interstitial areas under the second-floor concrete slab, beyond the areas with structural steel overhead. It has also been discovered above ceilings at first floor spaces where abatement has previously been performed.”</p> <p>d) The draft EIS does not reference 1) GSA inventory of ACM from IRIS or other databases, 2) historical asbestos surveys or the most recent asbestos inspection surveys, such as the 2017 Asbestos and Lead Survey Report by Millennium Env. Consulting Associates (MECA), CA0521SS, Dated Nov 20th, 2017.</p>			
<p>ID: 2-1</p>	<p>Name: Anonymous Attendee</p>	<p>Date: 4-Aug-20</p>	<p>Subject: Cultural Resources, Hazardous Waste and Materials</p>
<p>Comment</p>		<p>Response</p>	
<p>Are there any concerns about impact of different alternatives to anything beneath the property / subtitles with that? Is any public analysis of that available?</p>		<p>Regarding the potential for subsurface cultural sites, GSA consulted with the South Central Coastal Information Center which identified 22 Cultural Resources within 1 mile of the site, 5 cultural resources within 0.15 mile, and no resources located within the property boundary. One tribe, the Juaneño Band of Mission Indians, Acjachemen Nation, has agreed to participate in Section 106 Consultation. As stated in Section 3.2 of the EIS, the property would be considered sensitive for prehistoric resources and any ground-disturbing construction activities associated with the Alternative 1 construction of a new USCIS building would be monitored by both a qualified archaeologist and a Native American monitor. GSA does</p>	

not publicly provide locations of archaeological sites for protection of those resources.

Regarding the potential for sub-surface contamination, as summarized in Section 3.11 of the EIS, GSA conducted a Phase I environmental site assessment (ESA) investigation at the property; the results of which have been incorporated into the EIS. No hazardous waste contamination is known to occur on the site. The Phase I ESAs did not identify any visible signs of contamination including surface staining or stressed vegetation, or the presence (either currently or historically) of facilities such as petroleum storage tanks or solid waste disposal areas that would suggest the possibility of past contamination. The Phase I ESAs also did not uncover any specific evidence to suggest that any past contamination or cleanup had occurred on site, and the location is not listed in any databases of known contaminated sites. Due to the past agricultural use, residual contamination from historic use of pesticides and herbicides may be present in soils underlying the site. Soil sampling would be conducted prior to soil reuse or disposal for construction activities within the property under Alternative 1 to characterize the soil for the presence of hazardous materials (e.g., metals, petroleum hydrocarbons, volatile organic compounds, pesticides, etc.). If contaminated soil is present, appropriate management or disposal actions would be implemented in accordance with applicable regulatory requirements to prevent, minimize, and control hazardous materials, if necessary, during construction.

Future development of the site may require follow-on NEPA or CEQA analysis (depending on who acquires the site), as well as further consideration under the National Historic Preservation Act process, which could include, as necessary, sub-surface studies such as ground penetrating radar analysis for identification of subsurface conditions and objects.

ID: 3-1	Name: Anonymous Attendee	Date: 4-Aug-20	Subject: Cultural Resources
Comment		Response	
Is the site on the National Register of Historical Places?		As discussed in Section 3.2 of the EIS, past evaluation of the building determined the CHFB is individually eligible for listing in the National Register of Historic Places at the state level of significance under Criterion C, as an excellent example of a Modern/Brutalist ziggurat building designed by master architect William L. Pereira. GSA is obligated by Section 110 of the National Historic Preservation Act and GSA directives to work towards the listing of the building and is actively working on the National Register of Historic Places nomination as part of our Section 110 responsibility.	
ID: 4-1	Name: Anonymous Attendee	Date: 4-Aug-20	Subject: Cultural Resources
Comment		Response	
What is the likelihood that it will be listed on the National Registry of Historic Places?		The CHFB is likely to be accepted into the National Register of Historic Places. As discussed in Section 3.2 of the EIS, past evaluation of the building determined the CHFB is individually eligible for listing in the National Register of Historic Places at the state level of significance under Criterion C, as an excellent example of a Modern/Brutalist ziggurat building designed by master architect William L. Pereira.	
ID: 5-1	Name: Corene	Date: 4-Aug-20	Subject: Purpose & Need
Comment		Response	
Why doesn't the building meet GSA standards?		While the building is still safe to occupy, other building standards (e.g., related to accessibility and security) have changed since the building was initially built in the 1970s. Section 1.2.2 in the Draft EIS describes specific GSA standards that are not currently being met.	
ID: 6-1	Name: Anonymous Attendee	Date: 4-Aug-20	Subject: Cultural Resources
Comment		Response	
Is GSA staff actively advocating for the inclusion of the building into the National Registry of Historic Places?		Please refer to the response to Comment #3-1 for a discussion of GSA's actions towards the National Register of Historic Places nomination process.	

ID: 7-1	Name: Barbara Thomas, South Orange County Economic Coalition	Date: 4-Aug-20	Subject: Cultural Resources
Comment		Response	
<p>My name is Barbara Thomas, I am the executive director of the South Orange County Economic Coalition here in South County and I was just curious as to, just two questions. If the building does make it on the National Registry does that mean that the building stays intact?</p>		<p>Please refer to the response to Comment #3-1 for a discussion of GSA's actions towards the National Register of Historic Places nomination process. Federal agency historic review requirements are the same whether the CHFEB is listed in the National Register or just determined eligible. GSA is conducting a Section 106 historic review process separately from this NEPA process. The Section 106 process seeks to accommodate historic preservation concerns with the needs of federal undertakings through consultation among GSA and other parties with an interest in the effects of the undertaking on the CHFEB. The final results of the Section 106 process will be recorded in the Record of Decision for this EIS. If you would like to participate in the Section 106 process, please contact Jane Lehman, GSA Regional Historic Preservation Officer at jane.lehman@gsa.gov. Please refer to the response to Comment #28-7 for further information regarding the Section 106 process and its role in future use of the site.</p>	
ID: 7-2	Name: Barbara Thomas, South Orange County Economic Coalition	Date: 4-Aug-20	Subject: Project Timeline
Comment		Response	
<p>And my second question is what is the timeline with this process that you're looking at and is there any interaction that you would have with the city at all or the business community? It's just been such a large part of the economics down here and I was just curious to how you view this.</p>		<p>The City of Laguna Niguel is participating in the Section 106 process as a consulting party. GSA staff are coordinating with the City staff at least on a monthly basis. Both of these activities will help inform the City of forth-coming events related to the property. Please refer to the response to Comment #9-1 regarding anticipated timeline for the process.</p>	

ID: 8-1	Name: Anonymous Attendee	Date: 4-Aug-20	Subject: Proposed Action
Comment		Response	
Will disposition of the property be led by the Public Buildings Reform Board and its staff in conjunction with the other assets included in their report?		The Public Buildings Reform Board is working in partnership with GSA under the Federal Assets Sale & Transfer Act (FASTA) for disposition of this property. If the property is disposed under Alternatives 1 or 2, GSA would ultimately convey the property as required by legislation and authorities within GSA, but the Public Buildings Reform Board would be involved in the planning for the sale. See Section 2.1.1.1 of the EIS for more information.	
ID: 9-1	Name: Kim	Date: 4-Aug-20	Subject: Cultural Resources
Comment		Response	
How long is the whole process?		The Section 106 process is currently anticipated to occur over the next approximately 6 to 8 months, although the exact length of time is subject to change. The Section 106 process would need to be concluded before the Record of Decision can be signed, which is the final step in the NEPA process.	
ID: 10-1	Name: Anonymous Attendee	Date: 4-Aug-20	Subject: General
Comment		Response	
For historical reference any information on why the building was named after Chet originally? I have read that in Congress Chet Holifield was most remembered for wanting to create a nationwide system of underground shelters for emergency preparedness.		Chet Holifield was a long serving congressman and advocated for the federal government to acquire the building. Appendix C of the EIS provides detailed historical information on the property from past reports.	
ID: 11-1	Name: Corene	Date: 4-Aug-20	Subject: Proposed Action
Comment		Response	
How soon would employees be relocated to commercial space?		Employee relocation would occur after the Section 106, NEPA, and disposal processes are completed, as well as after new lease spaces are identified and negotiated. The GSA leasing group is actively working with tenant agencies to develop relocation plans. Relocations plans for one federal agency are tentatively scheduled for later in 2021; however, this relocation is contingent on completion of the previously stated processes. There is the potential for a lease-	

		back requirement associated with the disposal of the property, that could allow for some tenant agencies to remain in the CHFEB for up to three years, which would be negotiated as part of the disposal process.	
ID: 12-1	Name: Barbara Thomas South Orange County Economic Coalition	Date: 4-Aug-20	Subject: Transportation and Traffic, Socioeconomics
Comment		Response	
<p>Do you have the demographic breakdown of where the employees are coming from that work at the Ziggurat? Are they primarily from South Orange County or are they coming in from other areas? I was just curious of that breakdown. Again, my name is Barbara Thomas and I'm with the South Orange County Economic Coalition.</p> <p>I was just curious – many of our employer groups down here in South Orange County, a lot of our employees come from outside of the area. I was curious not only from a traffic standpoint, and relocating them, and where, but also the economics of having that many employees in the City of Laguna Niguel patronizing other business and things like that as well.</p>		<p>GSA does not have a full demographic breakdown of all points of origination (residence of employees) for the tenant agencies; however, the expectation is that the agencies would predominantly remain in Orange County. As stated in Chapter 2 of the EIS, tenant agencies have primarily indicated a desire to remain in south Orange County but have also expressed willingness to relocate to areas such as Irvine, Santa Ana, Anaheim or other central or northern portions of the County. In some instances, tenants have expressed willingness to relocate as far as Long Beach in Los Angeles County. Under Alternative 1, all USCIS tenants would remain in Laguna Niguel in a newly constructed facility. The exact location of new leased office space for the remaining approximate 1,000 tenants is not currently known, but GSA anticipates at least 55 percent of tenants would relocate in south or central Orange County no farther north than Irvine, with as many as 45 percent of the remaining tenants relocating to areas north of Irvine such as Santa Ana, Anaheim, or Long Beach. Under Alternative 2, the exact potential lease location for USCIS is not currently known, but would be located within Orange County. Similar to Alternative 1, approximately 55 percent of the remaining tenants would relocate in south or central Orange County no farther north than Irvine, with as many as 45 percent of the remaining tenants relocating to areas north of Irvine such as Santa Ana, Anaheim, or Long Beach. This may result in adverse, less than significant impacts to vehicle miles traveled in the area, depending on the place of residence of the</p>	

		employee and future lease location as described in Section 3.10.2.2 and Section 3.10.2.3 of the EIS. Please refer to Section 3.4 of the EIS for discussion of the economic impacts from the Proposed Action Alternatives.
ID: 13-1	Name: Corene	Date: 4-Aug-20
		Subject: Selection of Alternative
Comment		Response
What are the odds of “no action” being the choice?		Given the No Action Alternative does not meet the overall project purpose and need, it is likely that one of the two Action Alternatives will be selected, although this decision will ultimately be made in the Record of Decision to be issued at the conclusion of the NEPA process.
ID: 14-1	Name: Corene	Date: 4-Aug-20
		Subject: Proposed Action
Comment		Response
Serene said one agency might be relocated in 2021, can you share what agency that is?		The identity of the agency is currently procurement sensitive until it goes out to market.
ID: 15-1	Name: Corene	Date: 4-Aug-20
		Subject: General
Comment		Response
Can you repeat that website?		The project website is www.gsa.gov/chethnepa .
ID: 16-1	Name: Candy Cox	Date: 22-Aug-20
		Subject: Proposed Action
Comment		Response
I do not think the government should sell the building known as the “Ziggurat”. If you take down and build something smaller that is not wise. The smaller building with offices that are needed would be cost prohibitive. It would be better to lease space nearby. If the entire building is torn down, then the 92 acre parcel will be up for grabs. A development company would love to buy it. I do not think housing is the answer!		The EIS includes two Action Alternatives that include leasing for some or all of the current tenants of the CHFb. Beyond the two Action Alternatives analyzed within the EIS, GSA did consider other options for reduction, repair, and alteration re-use of the building and entirely new construction to accommodate all tenants. Section 2.4 of the EIS provides information as to why GSA did not consider these alternatives viable, including based on consideration of costs, and therefore, has dismissed them from further consideration. Regarding future demolition and potential private development of housing on the site, as discussed within Sections 2.1.1.2 and

		2.1.2.1 of the EIS, future use of the site that is disposed would be dictated by the new owner and the City of Laguna Niguel re-zoning process (as applicable).	
ID: 16-2	Name: Candy Cox	Date: 22-Aug-20	Subject: Transportation and Traffic
Comment		Response	
We have enough problems. Traffic is horrendous.		Section 3.10 of the EIS considers existing traffic conditions surrounding the site and potential for changes to traffic due to each alternative.	
ID: 16-3	Name: Candy Cox	Date: 22-Aug-20	Subject: Water Resources
Comment		Response	
There is soon to be a water problem- not enough. There are too many problems that a housing development would bring!! Thank you for the opportunity to listen.		Section 3.14 discusses water supply and concludes there would be negligible to beneficial impacts to water supply with the reduction in tenant-utilized square footage and water efficiency measures implemented as a part of LEED® certification associated with the Action Alternatives. Regarding potential development of housing on the site, as stated within the EIS, future use of the site that is disposed would be dictated by the new owner and the City of Laguna Niguel re-zoning process (as applicable). Follow-on NEPA or CEQA analyses may be required (depending on who acquires the site) for any proposed redevelopment plans presented by a future developer, to include further consideration of utility demands and associated coordination with utility companies once final development plans are completed.	
ID: 17-1	Name: Peter DeGregori Vertical Advisers, LLC	Date: 22-Aug-20	Subject: Proposed Action
Comment		Response	
I recently read an article in the local news about the possible changes to the Ziggurat building. https://www.ocregister.com/2020/08/19/laguna-niguels-landmark-the-ziggurat-could-be-facing-the-wrecking-		As discussed in Sections 2.1.1. and 2.1.2 of the EIS, existing tenants of the CHFB, to include the IRS, would be relocated to new lease space primarily within Orange County, and no further than Long Beach, CA.	

<p>ball/amp/?fbclid=IwAR0oI2oLelxyE8H-lzjdd7FZ- _HBp3ZnEOoInCxd_R19LttOVQviY8Q4mzo</p> <p>I am a CPA and a resident of Laguna Niguel. I have worked in this building with the IRS for over the past 20 years, and I have driven by the building daily. Based on the article and the estimates to repair and the information in the article about usage of the building, I would agree with changes to the building and land. In working at this facility, the parking lot and building has not been maintained well. However, some floors are much nicer than others.</p> <p>First, I think the IRS office is needed in Southern California. It is already very difficult to deal with the IRS. Having a local IRS district office is very valuable for us as practitioners. Furthermore, you know the building houses other federal agencies, which I'm sure if valuable. Los Angeles is very dense, and with traffic is about 2 hours away from Orange County, CA. San Diego is dense and with traffic is about 2 hours away.</p>			
ID: 17-2	Name: Peter DeGregori Vertical Advisers, LLC	Date: 22-Aug-20	Subject: Proposed Action
Comment		Response	
<p>I would agree to build a new building for the IRS and other federal agencies, but I recommend that the government consider flexibility for future need. Historically, real estate in Southern California has been a good investment, so my suggestion is the following. (1) Build two new buildings for the IRS and other federal agencies. If only one building is currently needed, then lease out the other buildings, but by owning it, it provides the Federal government with options for needed expansion. To maximize the land use, a parking structure will be needed. Build the two building in a way that if the Federal government needs both buildings, they could be connected with minimal modifications.</p>		<p>GSA previously conducted a thorough Feasibility Study process that helped identify potentially viable alternatives that would meet the future needs of the existing CHFb tenants. The alternatives that were identified as initially viable included the two Action Alternatives carried forward for analysis in the EIS, as well as four additional alternatives that were dismissed from detailed analysis as they do not meet the Purpose and Need for the Proposed Action as described in Section 2.4 of the EIS.</p> <p>GSA is currently looking at options regarding development of a portion of the CHFb, as well as off-site leased spaces to house some or all of the tenant agencies, and ultimate disposal of some or all of the property that is determined to be excess, as discussed in</p>	

<p>Once the new buildings are completed, then the government can move the IRS and government employees out of the Ziguarat building into the new building, and sell the real estate that isn't needed.</p> <p>I feel this land provides the federal government with a good option to keep land and a building in southern California before this area becomes more expensive and dense.</p>		<p>Chapter 2 of the EIS. The EIS process will aid the decision-maker in selecting the best alternative which will accommodate the future needs of the existing tenants.</p>	
ID: 17-3	Name: Peter DeGregori Vertical Advisers, LLC	Date: 22-Aug-20	Subject: Future Development
Comment		Response	
<p>As a resident, I personally would like to see mixed used development with retail/ businesses on the ground floor and residential buildings above. If this would occur it should also provide federal workers an option to rent or own housing close to work and not needing to drive.</p>		<p>Regarding future mixed-use development on the site, as stated within Section 2.1.1.2 and 2.1.2.1 of the EIS, any future use of the site that is disposed would be dictated by the new owner and the City of Laguna Niguel re-zoning process (as applicable). Please refer to the response to Comment #28-4 for regarding future use of the CHFB site and its relation to GSA's action.</p>	
ID: 18-1	Name: Melissa McSwigan	Date: 22-Aug-20	Subject: Cultural Resources
Comment		Response	
<p>The CHFB is a great building - don't demolish it!</p> <p>Studies show that it can take between 10-80 years for a new, energy efficient building to overcome the negative environmental impacts created through the construction/demolition process (thereby cancelling the green good deeds). Also, today's new buildings may only have a lifespan of up to 45 years vs. buildings from the past that could, with some renovation and upkeep, last 100-500+ years. This building appears to be built with quality materials – please don't add it to our landfill when it could easily be repurposed!</p>		<p>Please refer to the response for Comment #19-1 regarding preservation of the CHFB. Please refer to the response to Comment #28-4 for regarding future use of the CHFB site and its relation to GSA's action.</p>	

ID: 19-1	Name: Kim Cooper & Richard Schave Cultural Historians, Essotouric	Date: 24-Aug-20	Subject: Cultural Resources
Comment		Response	
<p>We are writing to express our desire that a preservation and adaptive reuse solution be found for William Pereira's 1971 North American Aviation/Rockwell International plant, aka The Chet Holifield Federal Building.</p> <p>At a time when several of the acclaimed architect's most influential works in Southern California are threatened by redevelopment--including LACMA and the Los Angeles Times buildings--the GSA has a unique opportunity to protect and preserve a unique local and national landmark, while opening the door for creative redevelopment.</p> <p>The greenest building is the one that's already here. Save the Ziggurat! Citizens of the near and far future will thank you.</p>		<p>As described in Section 2.4 of the EIS, various alternatives related to the reuse of the CHFEB by GSA were considered but dismissed from detail consideration because they do not meet the Purpose and Need for the Proposed Action.</p> <p>As described in Section 2.1.1.1 of the EIS, Congress created the Public Buildings Reform Board (PBRB) as an independent federal agency in 2016 with two major mission elements (1) identify specific federal real property for disposal and reform, the federal real property practices in order to "obtain the highest and best value for the taxpayer" and (2) "facilitate and expedite the sale or disposal of unneeded federal civilian real properties". On October 31, 2019, the PBRB made a recommendation of disposal on 14 federal properties, to include the CHFEB. Text has been added to Section 1.2 of the EIS clarifying that the Proposed Action is needed to satisfy the recommendations of the PBRB (see response to Comment #28-3). Retention of the CHFEB by GSA does not meet the purpose and need, as it does not satisfy the recommendations of the PBRB.</p> <p>GSA's planning with respect to historic preservation requirements for the CHFEB and how that may affect future use at the site is being handled through the Section 106 process (36 CFR Part 800). This is a separate process than the NEPA process being undertaken in this EIS and seeks to accommodate historic preservation concerns with the needs of federal undertakings. Your views outlined here will be taken into account during the Section 106 process. If you wish to participate in this separate process, please contact Jane Lehman, GSA Regional Historic Preservation Officer at jane.lehman@gsa.gov. Please refer to the response to Comment #28-7 for further information regarding the Section 106 process and its role in future use of the site. Final decision regarding agreements</p>	

		made in the Section 106 process will be put in place in the Record of Decision for this EIS following completion of the Section 106 process.	
ID: 20-1	Name: Colleen M Cherry	Date: 19-Aug-20	Subject: Cultural Resources
Comment		Response	
Please preserve the ziggurat. Yes, the grounds have been ignored and are a mess. The building is an oddity which needs to be glorified not demolished. We have so little that we preserve and have so little to pass on our children. History matters.		Please refer to the response for Comment #19-1 regarding preservation of the CHFB. Please refer to the response to Comment #28-4 regarding future use of the site and its relation to GSA's action.	
ID: 21-1	Name: Dwight Nordstrom	Date: 21-Aug-20	Subject: Land Use
Comment		Response	
<ol style="list-style-type: none"> 1. My family lives 2 miles from the Ziggurat. 2. My Mom used to work at the Ziggurat for many years. 3. My family practices/shoots/plays basketball at the El Lazo courts 3 times/week. This has been ESPECIALLY important during Covid-19. 4. PLEASE, PLEASE KEEP THE 4 FULL-COURT BASKETBALL COURTS AVAILABLE IN WHATEVER PLANNING YOU DO. MANY, MANY OF US IN NEIGHBORHOOD USE THEM. THERE ARE NOT FREE, CLOSE-BY OTHER OPTIONS. 		<p>Under Alternative 1, GSA would retain approximately 27 acres of the southern portion of the 92-acre CHFB property and develop a new facility to house the USCIS. The anticipated design of the facility footprint and necessary parking as described in Chapter 2 of the EIS would likely require the use of the entire 27 acres that currently includes the El Lazo basketball courts. Therefore, preservation of the courts or reconstruction of new courts on the 27-acre owned GSA portion of the existing site would not be feasible under Alternative 1.</p> <p>Under Alternative 2, the entire 92-acre property would be disposed and the basketball courts may remain, however, the future development and use of the site would be dictated by the new owner and the City of Laguna Niguel re-zoning process (as applicable). Future development of the site (to include any removal of the El Lazo basketball courts) may be subject to follow-on NEPA or CEQA analysis, which may afford the public additional opportunities to provide comment on any proposed plans and impact analysis. Please note, the Final EIS has identified Alternative 2 as the Preferred Alternative.</p>	

ID: 22-1	Name: Paul Del Bene	Date: 24-Aug-20	Subject: Future Development
Comment		Response	
<p>I am a long-time resident of Laguna Niguel. I would like to comment on the DEIS.</p> <p>I like the proposal of demolition of the entire existing facility, building a new federal building and relocate all other tenants. Because the new building would be approx. 380k sq.ft. I would like to see two (or more) buildings in a layout similar to what The Irvine Company has constructed near Spectrum, maybe campus-like, including a parking garage, not sprawling parking that requires all that paving. I suggest more than one building in the event the government has a reduction in needed workforce thereby releasing a building or part of a building to a tenant. The government can house high security such as the IRS in its own building. I like the idea of keeping 3,000 personnel in our city, who contribute to the local retail economy, and housing. The balance of the property is sold to a master developer.</p> <p>In all cases I would like to see the building demolished.</p>		<p>Please refer to the response to Comment #28-4 regarding demolition and future use of the CHFEB and its relation to GSA's action. Please refer to the response to Comment #17-2 regarding alternatives carried forward for analysis and alternatives dismissed from further consideration in the EIS.</p>	
ID: 23-1	Name: Joseph Glatzer	Date: 24-Aug-20	Subject: Cultural Resources
Comment		Response	
<p>I am commenting on the Draft EIS for the Ziggurat in Laguna Niguel. I grew up in Orange County, in Brea. I have never this thing before in person, but it looks amazing. Why not invest in the building and keep it going? It is a wonderful historical landmark and it would be a crime to tear it down. Future generations should enjoy this building. Please preserve the building. Thank you.</p>		<p>Please refer to the response to Comment #19-1 regarding preservation of the CHFEB. Please refer to the response to Comment #28-4 regarding future use of the site and its relation to GSA's action.</p>	

ID: 24-1	Name: Jean Prijatel, USEPA	Date: 28-Aug-20	Subject: General
Comment		Response	
<p>The U.S. Environmental Protection Agency has reviewed the above-referenced document pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.</p> <p>The General Services Administration proposes to remove the existing tenants from the Chet Holifield Federal Building in Laguna Niguel, California, and either relocate them to a newly constructed facility adjacent to the existing building or relocate them to leased space around Orange County, California. On December 11, 2019, EPA provided scoping comments to the GSA regarding air quality, asbestos abatement, aquatic resources and impacts to wildlife, historic preservation, green building and low-impact development, traffic, and cumulative impacts. We note the GSA adopted our scoping recommendations in the preparation of this Draft Environmental Impact Statement. We specifically acknowledge the GSA's adoption of air quality impact mitigation measures, travel analysis for building employees and visitors, and the commitment to submit documentation to the State Historic Preservation Office when the building becomes 50 years of age in 2021.</p> <p>EPA appreciates the opportunity to review this Draft Environmental Impact Statement. When the Final EIS is released for public review, please send an electronic copy to Zac Appleton. If you have any questions, please contact me at (415) 947-4167, or contact Zac Appleton, the lead reviewer for this project, at 415-972-3321 or appleton.zac@epa.gov.</p>		<p>GSA thanks the USEPA for their input in the NEPA process. An electronic copy of the Final EIS will be provided once issued.</p>	

ID: 25-1	Name: Dana Tomasello	Date: 29-Aug-20	Subject: Future Development
Comment		Response	
<p>I would like to submit a public comment on the suggested development of the Chet Holifield federal property future development.</p> <p>I recently learned of a recently opened recreation facility in San Diego county, called a pump track, and wondered if it may be something Laguna Niguel could consider building in the future? I know various options for development of the federal Ziggurat building site are under consideration, and there is a large expanse of land where a facility such as this could be built. It would be the first in Orange County and could serve a variety of wheeled recreational activities, from skateboards, bikes, roller skates and even non-motorized scooters as does the one in San Diego.</p> <p>Please check out this you tube link: https://youtu.be/wZWc4g0m8M4</p>		<p>Thank you for your comment. Please refer to the response to Comment #28-4 regarding future use of the site and its relation to GSA's action.</p>	
ID: 26-1	Name: Chris Phillips	Date: 30-Aug-20	Subject: Cultural Resources
Comment		Response	
<p>I live in Laguna Niguel, CA and hope whatever happens to the building, it remains intact. Please don't level it! Society tends to destroy these old building and this has lots of caricature.</p>		<p>Please refer to the response to Comment #19-1 regarding preservation of the CHFB. Please refer to the response to Comment #28-4 regarding future use of the site and its relation to GSA's action.</p>	
ID: 27-1	Name: Manny Medrano	Date: 30-Aug-20	Subject: Cultural Resources
Comment		Response	
<p>Please find ways to preserve or reuse the Chet Holifield Building instead of demolishing a notable and historic structure. The Ziggurat is a big part of the Laguna Niguel community as it is also a cherished landmark. It also has potential purposes such as an emergency shelter and as a community multi purpose recreation hall that can be rented out to large parties and</p>		<p>Please refer to the response to Comment #19-1 regarding preservation of the CHFB. Please refer to the response to Comment #28-4 regarding future use of the site and its relation to GSA's action.</p>	

conventions. I have seen it's striking appearance in films and is quite a power symbol. Thank you.			
ID: 28-1	Name: Jonathan Orduna, Community Development Director, City of Laguna Niguel	Date: 1-Sep-20	Subject: General
Comment		Response	
<p>On behalf of the Mayor and City Council Members of the City of Laguna Niguel, thank you for providing us with an opportunity to review and comment on the Chet Holifield Federal Building (CHFB) draft Environmental Impact Statement (EIS). We also appreciate GSA's recognition that the City of Laguna Niguel is the primary stakeholder affected by this project and your willingness to hear our concerns and work with us on solutions. We are hopeful we can maintain a strong federal - local partnership as this project moves forward.</p> <p>We have reviewed the Draft EIS and have several substantive comments/concerns. We have outlined those concerns in greater detail below, but in summary we are concerned that 1) the EIS does not identify a preferred project; 2) both Alternatives contemplate demolition of the CHFB, but neither the Proposed Action, Purpose and Need, nor Impact Analysis adequately analyze demolition of the CHFB structure; 3) the EIS includes a mitigation measure that would prevent/preclude implementation of either Alternatives 1 and 2; and 4) the results of this EIS will likely result in the abandonment and further deterioration of the CHFB structure resulting in a significant impact that was not analyzed in this EIS.</p>		<p>GSA appreciates the City of Laguna Niguel's participation in the NEPA process. Please refer to responses to Comments #28-2 through #28-8 regarding the specific points raised by the City.</p> <p>Regarding identification of the preferred project, the Final EIS identifies the Preferred Alternative as Alternative 2.</p>	
ID: 28-2	Name: Jonathan Orduna, Community Development Director, City of Laguna Niguel	Date: 1-Sep-20	Subject: Proposed Action
Comment		Response	
Under the National Environmental Policy Act of 1969 (NEPA), the "purpose and need" for a project is a critical element in the		Regarding description of the Proposed Action/project, the relocation of tenants would also involve the disposing portions of the CHFB	

<p>environmental review process. It explains the reason that the action being proposed is needed and serves as the basis for developing a reasonable range of alternatives. The deficiency with this EIS is there are no details of a proposed project. The EIS includes a reasonable range of alternatives, but no project has been proposed.</p> <p>"The Proposed Action is defined as the relocation of tenants of the CHFEB to new office space that meets appropriate applicable building code, accessibility, and security standards." (Section 2.1, Page 2-1)</p> <p>All that is stated for the Proposed Action is relocation of tenants. Since this is the only statement defining the Proposed Action, the reader is left with an understanding that the EIS is only analyzing and clearing the relocation of tenants and nothing else.</p>	<p>property not being used for new tenant facilities. For Alternative 1, this would equate to approximately 64.85 acres of land to include the CHFEB; the 27.15 acres not disposed would remain in GSA ownership for construction of a new facility for the USCIS. For Alternative 2, the entire 92 acres would be disposed as GSA would not construct a new facility within the existing CHFEB property. The Final EIS includes addition of the following text clarification in Section 2.1 to emphasize disposal would be part of the Proposed Action Alternatives:</p> <p>"The Proposed Action also includes disposal of GSA property reported as excess (Section 2.1.1.1 highlights the disposal process for federal facilities)."</p>		
<p>ID: 28-3</p>	<p>Name: Jonathan Orduna, Community Development Director, City of Laguna Niguel</p>	<p>Date: 1-Sep-20</p>	<p>Subject: Purpose and Need</p>
<p>Comment</p>		<p>Response</p>	
<p>The Purpose portion under the Purpose and Need heading only provides slightly more information stating:</p> <p>"The purpose of the Proposed Action is to accommodate the long-term office space requirements for the current tenants located at the CHFEB that would meet applicable building code, accessibility, and security standards." (Section 1.2.1, Page 1-5).</p>		<p>The Purpose and Need section has been clarified to provide a basis for the disposal.</p> <p>Section 1.2.1 of the Final EIS includes addition of the following text to describe the purpose: "The Proposed Action would also dispose of any excess federal property within the 92-acre CHFEB site".</p> <p>Section 1.2.2 of the Final EIS includes addition of the following text to justify the need for disposal: "The Proposed Action is also needed to address the Public Buildings Reform Board (PBRB) recommendations under P.L. 114-287, the Federal Assets Sale & Transfer Act of 2016 (FASTA) which made a recommendation of disposal of the CHFEB (see Section 2.1.1.1 for additional information)."</p>	

ID: 28-4	Name: Jonathan Orduna, Community Development Director, City of Laguna Niguel	Date: 1-Sep-20	Subject: Decision to be Made, Future Development
Comment		Response	
<p>However, the limited description of the Proposed Action and project Purpose seem to conflict with other information included in the EIS, as follows:</p> <ul style="list-style-type: none"> • In the description of Alternative 1 (Hybrid Lease/Construction) in Section 2.1, the EIS introduces the concept of disposal of federal property (Section 2.1.1.1). However, neither the Proposed Action nor the Purpose and Need include or discuss the concept of disposal, yet disposal seems integral to both Alternative 1 and 2. • Later in Section 2.1 the EIS includes Section 2.1.1.2 titled, "Future Development of the Existing Parcel." This section states, "Although redevelopment is not considered under this Proposed Action, renovation and/or demolition, construction, and operation are considered foreseeable indirect impacts (see Section 3.1.1). Therefore, a range of potential future development scenarios are considered in this analysis ... " • One of those development scenarios is "Demolition of existing CHF B and construction of new mixed-use space." Section 2.1.1.2 on Page 2-6, second bullet states: "The new owner would demolish the existing CHF B and construct a new development in accordance with the City of Laguna Niguel rezoning process." • The theme of redevelopment is continued in Section 2.1.2.1 for Alternative 2 with the following language, "Future development of the existing parcel under Alternative 2 would be similar to as described for 		<p>The decision to be made is whether to relocate all the tenants offsite to existing office space or to retain a portion of the site (27.15 acres) to construct a new facility for USCIS which has unique security requirements. As described in the responses to Comment #28-2 and #28-3, Sections 1.2.1 and 1.2.2 (related to the Purpose and Need) and 2.1 (related to the description of the Proposed Action) have been clarified to state that disposal of some or all of the CHF B property is part of GSA's Proposed Action. Other than then 27.15 acres retained under Alternative 1 for construction of the USCIS building, no description is included "where GSA describes to the public their proposal of what they want to do with the CHF B property" as excess property will be disposed and GSA will no longer have control over use of the disposed property.</p> <p>Regarding demolition of the CHF B site, the Proposed Action does not include demolition of the CHF B by GSA or any future use of the site by GSA beyond disposal. As stated in Sections 2.1.1.2 and 2.1.2.1 of the EIS, demolition of the CHF B by the site's new owner following the disposal process is one reasonably foreseeable scenario that was determined could be likely to occur following disposal, along with renovation and infill development. These actions are not within the decision authority of GSA, but are evaluated as 'indirect effects' as they could not occur but for GSA's action of disposing of some or all of the CHF B site (refer to Section 3.1.2 of the EIS for more information on indirect effects). The EIS evaluates the impacts of reasonably foreseeable development scenarios of the disposed property, with the understanding that a new owner has not been identified and development plans for the site are not yet available and therefore more detailed analysis of such actions is not possible or appropriate at this time. Further, the EIS acknowledges the appropriate level of NEPA analysis (federal</p>	

Alternative 1, but for development of the entire 92-acre site as shown in Figure 1- 2."

Our concerns with these sections of the EIS are:

1. There is no defined project, where GSA describes to the public their proposal of what they want to do with the CHF� property and why they think their proposal is the best use for the property, i.e., a clear Proposed Action and corresponding Purpose and Need.
2. The Proposed Action only refers to relocation of tenants, yet Alternative 1 and 2 clearly contemplate disposal of federal property and demolition of the existing CHF� structure. The Proposed Action should be re-written to make it clear the EIS is analyzing disposal of the property and demolition of the CHF� structure.
3. The Purpose and Need also needs to be rewritten to describe the purpose of the project as disposal of the property and demolition of the CHF� to be consistent with the Proposed Action.

As drafted, it is unclear what NEPA clearance the EIS is providing. Is the NEPA clearance only limited to relocation of tenants as stated in the Proposed Action and Purpose and Need? Does the NEPA clearance also include disposal of the CHF� property as discussed in the Cultural Resources Section (Section 3.2)? Or does the EIS provide NEPA clearance to fully cover Alternatives 1 and 2, which both contemplate demolition of the CHF�?

ownership) or CEQA documentation (non-federal ownership) may be required by the new site owner along with all necessary land use approvals once development plans are further established. The Final EIS has been clarified throughout to emphasize that future development of the CHF� is not a part of GSA's Proposed Action.

ID: 28-5	Name: Jonathan Orduna, Community Development Director, City of Laguna Niguel	Date: 1-Sep-2020	Subject: Cultural Resources, Impact Reduction Measures
Comment		Response	
<p>In our opinion, the EIS needs to be revised to fully analyze the Proposed Action, which includes disposal and demolition of the CHFB. As detailed below, the EIS skirts around the issue and does not provide analysis of demolition even though both Alternatives clearly include demolition as a foreseeable outcome of the implemented Alternative. More concerning is the EIS includes a mitigation measure that would prevent implementation of Alternatives 1 and 2 by preventing demolition of the CHFB structure.</p>		<p>Please refer to the response to Comment #28-2 through #28-4 regarding inclusion of disposal and future use of the CHFB site (to include demolition) in the EIS analysis.</p> <p>GSA understands the mitigation being referenced here relates to potential deed restrictions/covenants and/or easements which the State Historic Preservation Officer (SHPO) may enforce that require future projects that would potentially affect the resource be done in compliance with the <i>Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards)</i>. Please refer to the response to Comment #28-7 regarding the inclusion of that impact reduction measure in the Final EIS and as it relates to selection of an Action Alternative.</p>	
ID: 28-6	Name: Jonathan Orduna, Community Development Director, City of Laguna Niguel	Date: 1-Sep-2020	Subject: Cultural Resources
Comment		Response	
<p>Section 3.2 of the EIS analyzes impacts to cultural resources. The EIS concludes the CHFB is eligible for listing on the National Register of Historic Places (NRHP), "due to the rarity of its architectural style and its association with master architect, William Pereira." (p. 3-3) The environmental consequences for Alternatives 1 and 2 are discussed in Sections 3.2.2.2 and 3.2.2.3 respectively. Since the discussion of environmental consequences is nearly identical for Alternatives 1 and 2, our comments apply to both Alternatives.</p> <p>Two environmental consequences were identified:</p> <ol style="list-style-type: none"> Adverse effects and moderate impact from "partial demolition of the landscaping and site plan to visual 		<p>Please refer to the response to Comment #28-2 through #28-4 regarding inclusion of disposal and future use of the CHFB site (to include demolition) in the EIS analysis.</p> <p>Regarding impacts described in Section 3.2:</p> <ol style="list-style-type: none"> As part of Alternative 1, GSA would construct a new facility for the USCIS on the 27.15 acres retained in GSA possession. This action would not directly impact the National Register of Historic Places-eligible CHFB, rather it would impact the viewshed. As described in the responses to Comment #28-2 and #28-3, additional text has been added to the Purpose and Need 	

impacts related to the loss of views to and from the historic property." (Page 3-8 and 3-9) While not stated, these consequences appear to only be related to the construction of a new office building on a portion of the CHFB site associated with Alternative 1.

2. Adverse effect and significant impact from the transfer of property from federal ownership: "Additionally, Section 106 regulations state that the transfer or sale of a historic property out of federal ownership or control constitutes an adverse effect when undertaken without adequate and legally enforceable restrictions or conditions to ensure the long-term preservation of the property's historic significance. As such, the disposal of the property could result in an adverse effect and a permanent significant impact." (page 3-9)

As previously stated, both environmental consequences are associated with actions that are not described as the Proposed Action or in the Purpose and Need statement.

The document then briefly addresses impacts from future redevelopment by stating: "Any future renovation or demolition activities of the CHFB could result in adverse effects and significant impacts if either redevelopment action was conducted in a way that did not comply with the Secretary of the Interior's Standards. If future redevelopment of the site was conducted in accordance with the Secretary of the Interior's Standards, there would be no adverse effect and no significant impact to the historic property." (p. 3-9).

We have the following concerns with these conclusions:

sections and Proposed Action section clarifying the inclusion of disposal as part of GSA's action.

<ol style="list-style-type: none"> 1. Clearly disposal of the CHFB property is contemplated as a Proposed Action and should be stated as such. 2. Since disposal of the CHFB property is part of the Proposed Action, redevelopment of the CHFB property is highly likely and should be analyzed as such. However, the analysis in the EIS does not provide clear NEPA clearance for demolition of the CHFB structure. Very little analysis of demolition was provided and the EIS states: "Follow-on NEPA, NHPA, or CEQA analyses would be required (depending on who acquires the site) for any proposed redevelopment plans presented by a future developer and would further address cultural resources." (p. 3-9) 			
ID: 28-7	Name: Jonathan Orduna, Community Development Director, City of Laguna Niguel	Date: 1-Sep-2020	Subject: Cultural Resources, Impact Reduction Measures
Comment		Response	
<p>In light of the environmental consequences to cultural resources, the EIS concludes:</p> <p>"Any future renovation or demolition activities of the CHFB could result in adverse effects and significant impacts if either redevelopment action was conducted in a way that did not comply with the Secretary of the Interior's Standards. If future redevelopment of the site was conducted in accordance with the Secretary of the Interior's Standards, there would be no adverse effect and no significant impact to the historic property." (p. 3-9)</p> <p>"Under Alternatives 1 and 2, adverse effects and significant impacts could be eliminated by implementing deed restrictions in the form of covenants stating that change of ownership would require any changes to the property that will impact its character-</p>		<p>GSA's planning with respect to historic preservation requirements for the CHFB and how that may affect future use at the site, including renovation or demolition, is being handled through the Section 106 process (36 CFR Part 800). This is a separate process than the NEPA process being undertaken in this EIS and seeks to accommodate historic preservation concerns with the needs of federal undertakings. At this time, the details of the Section 106 process, to include specifics on any potential outcomes regarding the CHFB, are not finalized; therefore, the EIS has been revised to clarify the status of the Section 106 process and its role in generating any potential Impact Reduction Measures related to the Proposed Action. The views outlined here and throughout this comment will be taken into account during the Section 106 process.</p>	

defining features be done according to Secretary of the Interior's Standards." (p. 3-10)

Our concern with this Impact Reduction Measure is that it precludes demolition of the CHFB structure and implementation of Alternatives 1 and 2, leaving GSA with the only choice of selecting the No Action alternative.

The Secretary of the Interior's Standards for the Treatment of Historic Properties provides standards for only the four following actions (https://www.nps.gov/history/local-law/arch_stnds_82.htm):

- Standards for Preservation
- Standards for Rehabilitation
- Standards for Restoration
- Standards for Reconstruction

The Secretary of the Interior's Standards do not permit demolition. Therefore, the suggested deed restriction requiring compliance with the Secretary of the Interior's Standards would make it impossible for redevelopment of the CHFB site to include demolition of the CHFB structure.

As we have established earlier in this comment letter, the Proposed Action being analyzed in this EIS, based on the development of alternatives and statements in the EIS, should include both disposal and demolition of the CHFB property and structure to allow for redevelopment of the site. However, a Deed Restriction against the property requiring compliance with the Secretary of the Interior's Standards for Treatment of Historic Properties would conflict with the Proposed Action, and thus Alternatives 1 and 2, by preventing demolition of the structure and redevelopment of the site. To undo this Impact Reduction Measure in the future, the beneficiary of the deed restriction or

Regarding Impact Reduction Measures precluding implementation of the Proposed Action, the disposal of excess property within the site is not predicated on one specific future use of the site over the other, rather is contingent on a willing buyer yet to be identified. The EIS considers a range of future development scenarios as described in the response to Comment #28-4, as plans regarding future development are not currently known, including with respect to historic preservation and the Section 106 process. Results of the Section 106 process will be detailed in the Record of Decision for this EIS, and will balance the future needs of federal planning (to include allowing GSA to meet its Purpose and Need for this Proposed Action, which per revisions to Comment #28-3, includes the need to dispose of excess property). Due to the value of land within the region and development/reuse potential, GSA believes there will be potential buyers for the property.

Please refer to the response to Comment #28-2 through #28-4 for further discussion regarding inclusion of disposal and future use of the CHFB site (to include demolition) in the EIS analysis.

<p>easement, which would most likely be the Secretary of the Interior, would need to release/quit claim the restriction, which they couldn't do because that action would conflict with the Standards referenced in the deed restriction.</p> <p>Therefore, this EIS needs to be revised to:</p> <ul style="list-style-type: none"> • Include disposal and demolition of the CHF� structure in the Proposed Action; • Clearly and thoroughly analyze the Proposed Action, including disposal and demolition of the CHF� structure so those actions have complete NEPA clearance; and • Remove a Deed Restriction requirement that prevents implementation of the Proposed Action and permits demolition of the CHF� structure, even if a significant impact remains that must be accounted for and justified in the Record of Decision. 			
ID: 28-8	Name: Jonathan Orduna, Community Development Director, City of Laguna Niguel	Date: 1-Sep-2020	Subject: Abandonment of the CHF� Not Analyzed
Comment		Response	
<p>Given how this EIS has been drafted, the City of Laguna Niguel is concerned the relocation of the tenants from the CHF� will leave a property and structure that sits and deteriorates, unused, over time, resulting in an eye-sore and attractive nuisance within our City. The measures included in this EIS would actually lead to and cause a significant impact to the natural and human environment that have not been analyzed in this EIS.</p> <p>Under Alternatives 1 and 2 either 64.85 or all 92 acres would be deemed surplus property. Based on this EIS, that surplus property would have a deed restriction preventing the demolition of the existing 1,000,000 square foot building. The only options under the Secretary of the Interior's Standards would be</p>		<p>Please refer to the response to Comment #28-7 regarding Impact Reduction Measures precluding implementation of the Proposed Action. As described in this response, the Section 106 process will balance the future needs of federal planning (to include allowing GSA to meet its Purpose and Need for this Proposed Action, which per revisions to Comment #28-3, includes the need to dispose of excess property). Therefore, GSA does not believe abandonment and deterioration of the building is a foreseeable outcome and therefore was not considered within the EIS.</p>	

preservation, rehabilitation, restoration, or reconstruction. The Need Statement indicates the CHFB structure has not been touched in many years and is deteriorating rapidly.

"Other than some energy-related modifications, there have been no modification to the CHFB since the 1980s. Most of the building's infrastructure is beyond its useful life and deficiencies have been documented in all major mechanical and electrical systems, including life-safety, fire protection, and fire sprinkler systems. Additionally, numerous issues exist, including the presence of asbestos containing materials (ACM) and the need to improve the building's response to future seismic events." (p. 1-5)

What federal agency or developer would opt to acquire 64.85 or 92 acres, encumbered with a 1 million square foot structure in need of significant and costly improvements as noted above, that cannot be demolished? We believe the answer is none. GSA would likely still move forward with the relocation of the tenants from the CHFB as described in the Proposed Action because the CHFB building no longer works for the tenants, and the CHFB structure and remaining property would sit unused and deteriorating over time. This would result in a significant environmental consequence that is not analyzed in the EIS.

The City of Laguna Niguel is very concerned about the future of the CHFB property. The property is significant in size and location within the City. If not handled properly, the future of the CHFB property could have substantial negative impact on the City. Conversely, successful relocation of the tenants and redevelopment of the property would provide a tremendous benefit to both GSA and the City. The City would very much like to work with GSA to avoid potential pitfalls and foster successful redevelopment. As indicated in this letter, the City has significant concerns with the EIS. However, those concerns can be

<p>addressed with substantial edits to the EIS. Such action would thereby clear a path for anticipated City consideration of potential redevelopment opportunities and related rezoning alternatives for the property that the City would otherwise be forced to postpone indefinitely, further hampering GSA disposal efforts.</p> <p>Should you have any questions, please contact Erica Roess, Senior Planner at (949) 362-4067 or by email at eroess@cityoflagunaniguel.org.</p>			
ID: 29-1	Name: Evgeniya Varlamova	Date: 1-Sep-2020	Subject: Proposed Action, Cultural Resources
Comment		Response	
<p>Hopefully, it is not too late to express my opinion on our only one local Landmark - the Federal Building in Laguna Niguel.</p> <p>Please find the picture attached. I will mail you a few pictures just to show that this Building could be seen almost from every point around and looks very beautiful on the Saddleback Mountains background. It is older than most of the buildings around. It was built by famous architect. A lot of people like it. I checked on discussions on Facebook and most people think that this building has great historical and architectural value. Most local residents are sure that this building should be preserved for future generations and used as museum, art gallery, children science museum, etc.</p> <p>Hope you will receive a lot of emails/mails and cards with support to our local Landmark - The Federal Building of Laguna Niguel / our pyramid.</p> <p>Thank you so much for listening to local residents and have a WONDERFUL DAY!</p>		<p>Please refer to the response to Comment #19-1 regarding preservation of the CHFB.</p>	

ID: 30-1	Name: Carl Schulkin	Date: 2-Sep-2020	Subject: Proposed Action, Cultural Resources
Comment		Response	
<p>Carl Schulkin, Retired History teacher, college counselor and Holocaust educator living in Laguna Niguel, CA:</p> <p>“I believe that south Orange County has been largely shaped by the work of two architect/planners, Victor Gruen and William Pereira. Pereira and his firm were the architects not only for the Ziggurat, but for the entire original campus of UCI. Moreover, I emphasized to the reporter, Pereira drew up the original plan for the area surrounding UCI, what eventually became the city of Irvine. The Irvine Company was so impressed with Pereira's work that they then hired him to draw up the master plan for the development of the entire Irvine Ranch. As a historian, therefore, I think the best path to preserving the Ziggurat is to convince the Irvine Company to support the creation of a museum to occupy much of the building. The museum could feature the work of William Pereira, who designed many famous buildings beyond Orange County, and include the history of the building of the UCI campus, the City of Irvine and the subsequent development of the Irvine Ranch. If I were designing such a historical museum, I would also include the creation of Fashion Island, designed for the Irvine Company by Pereira and Welton Becket, and Southcoast Plaza, designed by Victor Gruen, the pioneer builder of shopping malls. Gruen, by the way, also drew up the original plan for Laguna Niguel as well. The contest for commercial supremacy in south Orange County between the Irvine Company and the Segerstroms, the owners of South Coast Plaza, is yet another important story such a historical museum might tell.”</p>		<p>Please refer to the response to Comment #19-1 regarding preservation of the CHF. Please refer to the response to Comment #28-4 regarding future use of the site and its relation to GSA's action.</p>	

ID: 31-1	Name: Jane Alstatt	Date: 2-Sep-2020	Subject: Cultural Resources
Comment		Response	
<p>This letter is to express the support of the Orange County residents the efforts in preservation, conservation and/or possible repurpose of the local Landmark and part of American History - Chet Holifield Building.</p> <p>Chet Holifield Building is the true historical building built in 1968. It is older than most Americans. It was designed by famous architect William L. Pereira (please find some pictures and more details enclosed). It is one of the oldest unique buildings in South Orange County. It is a real landmark because it is visible almost from every point and brings value to the landscape and local architecture. Removing of this building will cause not only a huge loss to American History, but could cause the environmental catastrophe, because of the amount of asbestos used in the old days. We think that it will be much cheaper and safer for environment, community, and American History to find a new use of this historical building – like Art Gallery, Museum, etc.</p> <p>We believe that the Chet Holifield Building is an important part of American History, Architecture and famous Landmark. We need to preserve it the same way, as the Eiffel Tower was preserved from being destroyed 100 years ago, and now it is one of the most famous landmarks in the world.</p> <p>You never know how much our next generation will like it :)</p> <p>Thank you SO MUCH!</p>		<p>Please refer to the response to Comment #19-1 regarding preservation of the CHFb. Please refer to the response to Comment #28-4 regarding future use of the site and its relation to GSA’s action.</p>	

ID: 32-1	Name: The Franco Family	Date: 2-Sept-20	Subject: Cultural Resources
Comment		Response	
<p>Hope you are having an awesome week!</p> <p>By the way, we do not have too many unique buildings over here, in South Orange County, CA.</p> <p>We hope that you will develop the plan to preserve The Federal Building in Laguna Niguel in some form and find a new use for it, for example - for a children museum or airspace museum.</p> <p>You may create the National Airspace Museum and a park for kids, so they will learn more about the air force and army. Or keep it AS IS before you will find funds to do anything. We are in the recession, so we need to save money.</p>		<p>Please refer to the response to Comment #19-1 regarding preservation of the CHFEB. Please refer to the response to Comment #28-4 regarding future use of the site and its relation to GSA's action.</p>	
ID: 32-2	Name: The Franco Family	Date: 2-Sept-20	Subject: Proposed Action
Comment		Response	
<p>For offices for your employees you could consider new office buildings in Aliso Viejo. It is very close to Laguna Niguel and a lot of office buildings are empty for lease or sale.</p>		<p>Regarding potential future lease locations for existing locations, office space in Aliso Viejo is under consideration for some tenant agencies. Please refer to the response to Comment #12-1 for further discussion on potential new lease locations for the existing tenants of the CHFEB.</p>	
ID: 33-1	Name: Evgeniya Varlamova	Date: 2-Sept-20	Subject: Cultural Resources
Comment		Response	
<p>This is to express my strong opinion on our only one local Landmark in South Orange County - the Federal Building in Laguna Niguel. I believe it should be included in the US National Treasures and supported by special funds.</p> <p>This Building could be seen almost from every point around and looks very beautiful on the Saddleback Mountains background. Please find the pictures enclosed. It is older than most of the</p>		<p>Please refer to the response to Comment #19-1 regarding preservation of the CHFEB. Please refer to the response to Comment #28-4 regarding future use of the site and its relation to GSA's action.</p>	

<p>buildings around, and older than most of our residents :) It was built by famous architect. A lot of people like it. I checked on discussions on Facebook and most people think that this building has great historical and architectural value. Most local residents are sure that this building should be preserved for future generations and used as museum, art gallery, children science museum, etc.</p> <p>I believe this building could be included in National Treasures, and receive more funds to preserve it! May be Art and/or Museum organizations (The Getty Trust as an example) will express the interest to open the ART Gallery there :)</p> <p>Hope you will receive a lot of emails/mails and cards with support to our local Landmark - The Federal Building of Laguna Niguel / our pyramid.</p> <p>Thank you so much for listening to local residents and have a WONDERFUL DAY!</p> <p>Hope and praying for the best possible future for this building :)</p>			
ID: 34-1	Name: Scott Shelley, Branch Chief, Regional-IGR-Transit Planning, District 12, Caltrans	Date: 3-Sept-20	Subject: Transportation and Traffic
Comment		Response	
<p>Thank you for including the California Department of Transportation (Caltrans) in the review of the Draft Environmental Impact Statement for the Chet Holifield Federal Building Tenant Relocation Project in the City of Laguna Niguel. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability.</p> <p>The project examines the potential impacts of a proposed General Services Administration (GSA) project to remove existing tenants from the Chet Holifield Federal Building and relocate them to a newly constructed facility adjacent to the</p>		<p>Thank you for your comments. Section 3.10 of the EIS has been updated to adopt Impact Reduction Measures related to the construction of a new USCIS building. Regarding lease locations, GSA will work in good faith to identify or request measures related to bike storage and deliveries are offered at leased locations, although these will ultimately be at the discretion of the landlord for each future identified office.</p>	

existing building and/or lease space in Orange County. Regional access to the existing site is provided by State Route 73 (SR 73) and Interstate 5 (I-5). Caltrans is a responsible agency for this project and upon review, we have the following comments:

Transportation Planning

1. Alternative 1 in the Draft EIS for the Chet Holifield Federal Building Tenant Relocation notes that pedestrian infrastructure may be impacted by construction. Ensure that appropriate information and detours are provided to active transportation users who may be traveling through the area.

2. There are existing bicycle facilities in the project vicinity, including Class II bike lanes on Alicia Parkway, Avila Road, La Paz Road, and Aliso Creek Road. Thus, consider providing safe connections to these bicycle facilities. This will increase safety for active transportation users, as well as encourage staff to utilize multimodal transportation modes when commuting to work.

3. Caltrans supports improvements that reduce Vehicle Miles Traveled (VMT) and promote walking, biking, and transit. One example may include providing secure bicycle storage on the project site for employees who bike to work.

Freight

4. For Alternative 1, please consider incorporating designated areas/parking for freight delivery, package, and transportation network company's pickup and drop-off.

5. We recommend commercial and residential developments to offer pickup point services or automated parcel systems to allow for deliveries that can be made with one truck stop instead of multiple stops to individual residences.

<p>6. In order to reduce conflicts with traffic and bicycles, please consider directing deliveries to loading docks away from curbside. Please also consider redesigning outdated loading docks to accommodate new freight truck design. Utility alley space could be utilized if available, to take trucks off street curbs.</p> <p><u>Encroachment Permit</u></p> <p>7. Any project work proposed in the vicinity of the State Right-of-Way (ROW) would require an encroachment permit and all environmental concerns must be adequately addressed. If the environmental documentation for the project does not meet Caltrans's requirements for work done within State ROW, additional documentation would be required before approval of the encroachment permit. Please coordinate with Caltrans to meet requirements for any work within or near State ROW. For specific details for Encroachment Permits procedure, please refer to the Caltrans's Encroachment Permits Manual at: http://www.dot.ca.gov/hq/traffops/developserv/permits/</p> <p>Please continue to keep us informed of this project and any future developments that could potentially impact State transportation facilities. If you have any questions or need to contact us, please do not hesitate to contact Joseph Jamoralin at (657) 328-6276 or Joseph.Jamoralin@dot.ca.gov</p>			
ID: 35-1	Name: Melody Marler	Date: 4-Sept-20	Subject: Cultural Resources
Comment		Response	
<p>Please do all you can to save the Laguna Federal Building from sale and demolition. It is significant to Orange County history and the options for preservation and alternative uses need to be explored.</p>		<p>Please refer to the response to Comment #19-1 regarding preservation of the CHFB. Please note that under the Action Alternatives, mostly all federal agencies would remain within Orange County.</p>	

<p>I understand it is believed to not be possible. But, I also know that it is not right that a significant building is not being studied for any other reason than to avoid possible homeless camps in the parking lot. This building and the current services provided in it are very important to our County.</p> <p>The timing of your action is inappropriate. Please reconsider.</p>			
ID: 36-1	Name: Adam Bodner, Executive Director, Public Building Reform Board	Date: 4-Sept-20	Subject: Selection of Preferred Alternative
Comment		Response	
<p>This is an official comment from the Public Buildings Reform Board (PBRB or the Board) regarding the Draft Environmental Impact Statement (EIS) related to the future of the Chet Holifield Federal Building (CHFB) in Laguna Niguel, CA. Although the Board acknowledges that General Services Administration (GSA) must perform the National Environmental Policy Act (NEPA)-required review, the Board recommends that the GSA identify Alternative Two, the Lease Relocation Alternative, as its preferred alternative and select Alternative Two in the Record of Decision.</p>		<p>Thank you for your comment. GSA has identified Alternative 2 as the Preferred Alternative for reasons described in Section 2.1.2.</p>	
ID: 36-2	Name: Adam Bodner, Executive Director, Public Building Reform Board	Date: 4-Sept-20	Subject: PBRB as a Consulting Party
Comment		Response	
<p>When the factory now known as the CHFB was built, the location was empty and the surrounding area undeveloped. For these reasons, the site was considered appropriate for the original use of the building, which was as a manufacturing plant for military weapons, a use that certainly would not be considered appropriate today. Currently, Laguna Niguel is a rapidly growing residential community, with a need for a vibrant commercial center, and the CHFB, along with the adjacent site formerly used</p>		<p>The Public Buildings Reform Board (PBRB) as a federal entity has the same requirements under Section 106 of the National Historic Preservation Act as does GSA. GSA is the lead federal agency for this undertaking and the PBRB has been included as a consulting party.</p>	

<p>for parking, comprise 92 acres of prime real estate sitting in the center of that community.</p> <p>Regarding the economics of redevelopment of the building; since the building was originally designed and constructed as a manufacturing plant, it is not suitably configured for the highest and best uses currently in demand in the Laguna Niguel community. The building has massive floor plates with no sunlight to the interior. Most of the floors have no windows at all, since they were designed to be manufacturing spaces. Any rebuilding to accommodate current uses would require that the floorplates be demolished so that interior light courts could be constructed, which would fundamentally alter the building and its exterior appearance. The building also does not meet seismic codes, is riddled with asbestos, and its systems are outdated and need to be completely replaced.</p>			
<p>ID: 36-3</p>	<p>Name: Adam Bodner, Executive Director, Public Building Reform Board</p>	<p>Date: 4-Sept-20</p>	<p>Subject: Viability of Renovation</p>
<p>Comment</p> <p>Based upon our preliminary estimates, the costs of such a renovation would be so high as to be economically unfeasible. Thus, while we are mindful of the need not to prejudge a determination, we have formed a good faith preliminary view that the economics do not support the reuse of the CHFB, <i>by any entity</i>, and that the building will need to be demolished to clear the site for redevelopment. We also note that any attempt to preserve aspects of the existing building would still require fundamental changes to the original fabric of the building, as well as to its exterior appearance, thereby substantially diminishing its historic integrity. For these reasons, while the CHFB is eligible for listing in the National Register of Historic Places, the cost and structural requirements for potential reuse of the building make it unlikely to retain its eligibility under Criterion C.</p>		<p>Response</p> <p>Please refer to the response to Comment #28-4 regarding future use of the site and inclusion in the EIS. As future development plans are not fully known at this time, including the specifics on cost viability to potential future owners or theoretical renovation plans for a given future use, the EIS considers (from a general standpoint) a range of reasonably foreseeable future actions, including demolition, renovation, and infill development. GSA's action does not pre-select or predetermine any specific future use of the site because GSA does not have any decision authority over the site beyond disposal. Please refer to the response to Comment #28-7 for further information regarding the Section 106 process, its role in selection of an Action Alternative, and future use of the site.</p> <p>Future development may be subject to follow-on NEPA or CEQA analysis once development plans are further finalized.</p>	

<p>The EIS analysis does not take into consideration the feasibility of the reuse of the current building, only noting that any alterations would need to be in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties. The Draft EIS fails to analyze if the reuse of the CHFEB in accordance with the Secretary's Standards is a feasible, reasonably foreseeable development scenario given the current layout and potential cost of renovation.</p>			
ID: 36-4	Name: Adam Bodner, Executive Director, Public Building Reform Board	Date: 4-Sept-20	Subject: Cultural Resources
Comment		Response	
<p>Furthermore, the Draft EIS appears to conclude that an adverse effect assessment resulting from a sale with no restrictive deed attached is not a viable option. An adverse effect, with appropriate mitigation developed during the consultation process and documented in an agreement document and subsequently executed to satisfactory standards, is an acceptable finding under Section 106.</p> <p>Finally, while other impact topics, including cultural resources, disclose the potential for significant impacts under NEPA and the potential for adverse effects under NHPA under both action alternatives, it is unclear why GSA included a deed restriction/covenant under Alternative 2. Page 2-7 of the Draft EIS notes that demolition of the building is a potential future development scenario under Alternative 2; however, the deed restriction is included as part of the Cultural Resource analysis for both alternatives on page 3-9 even though a deed restriction is not part of the alternatives description in Chapter 2. The Board strongly recommends removing the deed restriction from the EIS analysis, including as an impact/effect reduction measure.</p> <p>Given our purpose and mission, the Board believes that Alternative Two is the only appropriate course of action. The</p>		<p>As stated in the comment, an adverse effect conclusion is a theoretical outcome of the Section 106 consultation process. The EIS has been revised to reflect the current status of the Section 106 process, including any potential Impact Reduction Measures that may result from that process, as described in the response to Comment #28-7. The final outcome of the Section 106 process will be made in the Record of Decision for this EIS.</p> <p>As previously stated, GSA has identified Alternative 2 as its Preferred Alternative and is currently conducting the Section 106 process.</p>	

<p>Board recognizes the adverse effect associated with Alternative Two and recommends that GSA immediately begin formal Section 106 consultation efforts under NHPA with Alternative Two identified as the preferred alternative. Given the FASTA-driven time frames of the OMB-approved disposition of the CHFB property, the Board further requests that GSA complete its NEPA and NHPA responsibilities with alacrity.</p> <p>Thank you for the opportunity to comment on the Draft EIS.</p>			
ID: 37-1	Name: Alexander Koster	Date: 4-Sept-20	Subject: Cultural Resources
Comment		Response	
<p>This email represents the public comment I am submitting on behalf of my family. We take a great interest in the preservation and repurposing of the Chet Holifield Federal Building to insure this unique architectural wonder of South Orange County endures for generations to come.</p> <p>Though the federal government may no longer be in need of the square footage, its prime location and raw space make it an ideal mixed-use development incorporating the likes of a community/recreation center, a branch library, shopping, and/or a space to house re-education and business development classes to power the future of the American economy and generate further economic activity and jobs. It would be a shame to lose this great structure with its ample parking, central location, unique architecture and pedigree.</p> <p>I look forward to hearing about further news from the federal government and community regarding the preservation and repurposing of this grand and unique structure in ways to help serve and strengthen our community. I stand in solidarity with my family and many of our neighbors in the community.</p>		<p>Please refer to the response to Comment #19-1 regarding preservation of the CHFB. Please refer to the response to Comment #28-4 regarding future use of the site and its relation to GSA's action.</p>	

ID: 38-1	Name: Norman & Paula Koster	Date: 4-Sept-20	Subject: Cultural Resources
Comment		Response	
<p>It is with great interest I write to you regarding the future of the Chet Holifield Federal Building known to our community as "the pyramid" or "the ziggurat". With its unique architectural character and design, for decades it has been a hallmark of the area. I always fondly looked upon it from my daughter's backyard in Aliso Viejo and can be viewed easily from my neighborhood as well.</p> <p>I am writing to you to encourage the GSA and federal government to consider keeping the building and repurposing for a new non-federal use. Options could be a shopping mall, housing, or a much needed community space. With the raw square-footage and parking available, it could become a mixed-use structure with all of the above involved. This would likely be a simple conversion since it already serves multiple agencies of the federal government as well as a children's day-care center.</p> <p>I look forward to further positive news to preserve this historic gem of our community.</p>		<p>Please refer to the response to Comment #19-1 regarding preservation of the CHFEB. Please refer to the response to Comment #28-4 regarding future use of the site and its relation to GSA's action.</p>	
ID: 39-1	Name: Krista Nicholds, President, Board of Directors, Preserve Orange County	Date: 4-Sept-20	Subject: Cultural Resources
Comment		Response	
<p>We wish to thank the General Services Administration (GSA) for conducting a thorough environmental review process thus far and respecting the architectural significance and historic nature of the Chet Holifield Federal Building (CHFEB). As the county-wide preservation advocacy group, Preserve Orange County has a special interest in seeing the CHFEB protected and sensitively reused.</p>		<p>Thank you for your comment. Preserve Orange County is a consulting party in the Section 106 process. GSA will continue to meet its obligations under Section 110 of the National Historic Preservation Act and GSA directives to work towards the listing of the building and is actively working on the National Register of Historic Places nomination as part of our Section 110 responsibility. Additionally, GSA will continue to actively work with the State</p>	

The CHFB was a beacon for growth in southern Orange County when North American Rockwell first announced its plans to move to Laguna Niguel in the late 1960s. The company's investment in a region that was then made up of tens of thousands of acres of ranch land was one important factor in instigating the development of the master planned communities of Laguna Niguel and Mission Viejo. The building's architecture was a bold statement of the promise of aerospace technology but also of the promise of community and a new way of life in the suburbs.

As the GSA's commissioned reports have outlined in the Determination of Eligibility (Heritage Architecture and Planning, 2016) and the Historic Structures Report (Architectural Resources Group, 2019), the CHFB is eligible for the National Register of Historic Places for its architectural significance and association with master architect, William Pereira. Preserve Orange County staunchly supports this conclusion. The "ziggurat" shape is both highly distinctive and representative of the Late Modern period in architecture. William Pereira's skills and influence as an ambitious planner and fearless architect have left an indelible mark on Orange County and California.

Not only is the building a rare surviving landmark of the space exploration and defense industries that fueled Southern California's growth through most of the twentieth century, it is an excellent candidate for an adaptive reuse solution guided by the Secretary of the Interior Standards for Rehabilitation. While the building requires seismic retrofitting and asbestos abatement, it was found to be in good condition structurally and materially. And though the building is enormous, it is surrounded by 58 acres of surface parking lot, leaving room for other development.

Preserve Orange County is not in a position to assume a conservation easement on the property. In the event a nonprofit

Historic Preservation Officer through the Section 106 process regarding the undertaking.

Please refer to the response to Comment #28-4 regarding GSA's role in future use of the site, to include demolition, and the response to Comment #28-7 regarding the Section 106 process and future use of the site.

<p>isn't found to hold the easement, we expect the GSA to follow through on its stated intentions of taking all necessary steps to protect the integrity of the CHFEB by legally binding a purchaser to maintain the historic integrity of the building. We look forward to learning more about the GSA's proactive approach to attracting appropriate developers/builders/owners.</p> <p>Finally, while we applaud the GSA for recognizing the cultural value of historic architecture, we hope it will soon consider the energy conservation benefits of historic preservation. An enormous upfront energy investment was made when the CHFEB was built that included natural resource extraction, manufacturing, transportation and installation of materials, in addition to the ongoing energy expenditure to maintain, repair or replace components or systems during the lifetime of the building. These factors as well as the energy that would be used in the event of demolition, to demolish and dispose of the debris, should be part of the GSA's calculus when weighing alternative solutions to existing buildings. As an agency with national reach, the GSA could take a leadership role in promoting the environmental benefits of rehabilitation.</p> <p>We appreciate the opportunity to provide comments on the Draft EIS. We look forward to the next stage of review.</p>			
ID: 40-1	Name: Michael Velarde	Date: 7-Sept-20	Subject: Hazardous Waste and Materials
Comment		Response	
<p>Hello, I am writing regarding the Chet Holifield Federal Building. I live with my family in very close proximity to this building. We have three young children (ages 6 months, 3 years, and 6 years), and our neighborhood has many young children, and there are at least three elementary schools near this building.</p>		<p>Please refer to the response to Comment #28-4 regarding future use of the site, including demolition, and its relation to GSA's action. Follow-on NEPA or CEQA analysis may be required for any future use of the site, to include further consideration of any potential air quality impacts associated with future development of the site. Any future development may also be subject to compliance with South Coast Air Quality Management District Rule 1403, which specifies</p>	

I am very concerned about this building being demolished given that it contains asbestos and may contain lead based paint as well. I do not see how a building of this size can be demolished without creating airborne environmental contamination to the surrounding homes, schools and businesses. Even if remediation steps are taken, the exterior walls themselves likely contain these toxic materials.

I believe that for the reasons above, at a minimum the exterior of this building should remain intact. It would be better to remodel the inside than to tear it down.

Please respond and let me know if and how these concerns have been considered.

work practices that limit asbestos emissions from building demolition and renovation activities. Similarly, CalOSHA Rule 1532.1 and the California Department of Public Health's lead-related construction program require work practices to minimize the generation of, and worker exposure to, lead-containing dust, which may minimize lead emissions. Text has been added to Section 3.3 and 3.11 of the Final EIS specifying these rules.