August 2020 | Initial Study

THE INVITATION

City of Anaheim
Development Plan No. DEV2019-00087

Prepared for:

City of Anaheim
Contact: Andy Uk, Associate Planner
200 South Anaheim Boulevard
Anaheim, California 92805
(714)765-5238

Prepared by:

PlaceWorks
Contact: William Halligan, Esq., Principal
3 MacArthur Place, Suite 1100
Santa Ana, California 92707
714.966.9220
info@placeworks.com
www.placeworks.com

PLACEWORKS

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Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
ADT	average daily traffic
AESD	Anaheim Elementary School District
AMC	Anaheim Municipal Code
APD	Anaheim Police Department
APN	Assessor's Parcel Number
APUD	Anaheim Public Utilities Department
ASTM	American Society for Testing and Materials
AUHSD	Anaheim Union High School District
AQMD	air quality management district
AQMP	air quality management plan
bgs	below ground surface
BMP	best management practices
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
CalRecycle	California Department of Resources, Recycling, and Recovery
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CGP	Construction General Permit
CMP	congestion management program
CNEL	community noise equivalent level
CO	carbon monoxide
CO_2e	carbon dioxide equivalent
dB	decibel
dBA	A-weighted decibel
DCV	design capture volume
DOC	California Department of Conservation
DPM	diesel particulate matter

Abbreviations and Acronyms

DRO	diesel range organics
DTSC	Department of Toxic Substances Control
EIR	environmental impact report
EPA	United States Environmental Protection Agency
FHSZ	fire hazard severity zone
FHWA	Federal Highway Administration
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
GHG	greenhouse gases
gpcd	gallons per capita per day
gpd	gallons per day
GRO	gasoline range organics
HCM	Highway Capacity Manual
HQTA	high quality transit area
IPCC	Intergovernmental Panel on Climate Change
kBTU	1,000 British thermal units
kWh	kilowatt hour
L_{dn}	day-night noise level
L_{eq}	equivalent continuous noise level
LID	low-impact development
LOS	level of service
LST	localized significance thresholds
mgd	million gallons per day
MMcf	million cubic feet
MND	(mitigated) negative declaration
MT	metric ton
MWh	megawatt hour
MWS	modular wetland system
NAHC	Native American Heritage Commission
NO_X	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
O_3	ozone
OC Basin	Orange County Groundwater Basin

Abbreviations and Acronyms

OCSD	Orange County Sanitation District
OCWD	Orange County Water District
OEHHA	California Office of Environmental Health Hazard Assessment
OES	California Office of Emergency Services
ORO	oil range organics
PM	particulate matter
POA	property owners association
PPV	peak particle velocity
PRC	Public Resources Code
RCNM	Roadway Construction Noise Model
REC	recognized environmental condition
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SoCAB	South Coast Air Basin
SO_X	sulfur oxides
SWPPP	Storm Water Pollution Prevention Plan
TCR	tribal cultural resource
TMDL	total maximum daily load
TPH	total petroleum hydrocarbons
UST	underground storage tank
UWMP	urban water management plan
V/C	volume-to-capacity ratio
VMT	vehicle miles traveled
VOC	volatile organic compound
WQMP	water quality management plan

Abbreviations and Acronyms

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1. Introduction

Renaissance City North Anaheim LLC, as the Project Applicant, proposes to demolish and remove an existing automobile tow yard business to develop The Invitation[1], a multi-family rental residential project (Proposed Project). The Proposed Project would construct a four-story multi-family development, with up to 269 dwelling units, and a six-story parking structure, on a 4.49-acre property at 1122 North Anaheim Boulevard in the City of Anaheim, Orange County, California. In addition, the Proposed Project includes off-site street widening and roadway improvements on Anaheim Boulevard, located adjacent to the Project Site to the west.

In compliance with the California Environmental Quality Act (CEQA), the City of Anaheim, as lead agency, is preparing the environmental documentation for the Proposed Project to determine if approval of the requested discretionary actions and subsequent development would have a significant impact on the environment. As defined by Section 15063 of the CEQA Guidelines, an Initial Study is prepared primarily to provide the lead agency with information to use as the basis for determining whether an environmental impact report, negative declaration, or mitigated negative declaration (MND) would provide the necessary environmental documentation and clearance for the Proposed Project. This Initial Study has been prepared to support the adoption of an MND.

1.1 PROJECT LOCATION

1.1.1 Regional Setting

The Project Site is in Orange County within the northwestern portion of the City of Anaheim (City). The City is approximately seven (7) miles northwest of Downtown Santa Ana and 23 miles southeast of Downtown Los Angeles. The cities of Yorba Linda, Placentia, Fullerton, Buena Park, Cypress, Stanton, Garden Grove, and Orange and unincorporated Orange County border the City. Interstate 5 (I-5) and State Routes (SR) 39, 55, 57, 90, 91, and 241 provide regional access to the City. Figure 1, *Regional Location*, shows the location of the Project Site.

1.1.2 Local Setting

The 4.49-acre Project Site is at 1122 North Anaheim Boulevard (Assessor's Parcel Numbers [APN]: 035-010-51), approximately 525 feet north of the intersection of La Palma Avenue and Anaheim Boulevard. The Proposed Project includes off-site street widening and roadway improvements on Anaheim Boulevard to the west of the Project Site. The off-site improvements increase the gross impacted area to 4.63 acres. When measured to the centerline of Anaheim Boulevard, the gross acreage increases to 4.86 acres. Figure 2, *Local Vicinity*, shows the Project Site in the local setting.

[1] Formerly known as the Renaissance Apartments.

The Project Site fronts and is east of Anaheim Boulevard. On the west side of Anaheim Boulevard are a variety of uses, including a vacant residential triplex and a vacant religious and community assembly use, commercial/light industrial uses and a single-family home; a parking lot for La Palma Park is located further to the west behind these uses. Industrial uses border the Project Site to the north and east. The La Palma Village mixed-use development project, which is currently under construction, borders the Project Site to the south. The Project Site is in an urbanized area in Anaheim, approximately 1,560 feet south of SR-91 at its closest point.

1.2 ENVIRONMENTAL SETTING

1.2.1 Existing Land Use

Existing land use on the Project Site includes an automobile tow yard operated by Anaheim Fullerton Towing, which provides storage, maintenance, and company vehicle repair, as well as impound vehicle storage, from various city and police departments. In addition, the Property Owner leases a portion of the property to Ecosystem Trucking to store/park its company vehicles. The Project Site is developed with four industrial buildings totaling 16,750 square feet (i.e., 2,080-square-foot office building, 728-square-foot employee break building, 12,122-square-foot freight truck shop, and 1,820-square-foot automobile storage warehouse), a carport, an asphalt-paved impound parking lot, and an unpaved freight truck parking lot. The Project Site also stores shipping containers and truck trailers. See Figure 3, *Existing Site Conditions*. Slatted chain-link fencing and block walls border the Project Site, and access to the Project Site is via two gated driveways on Anaheim Boulevard.

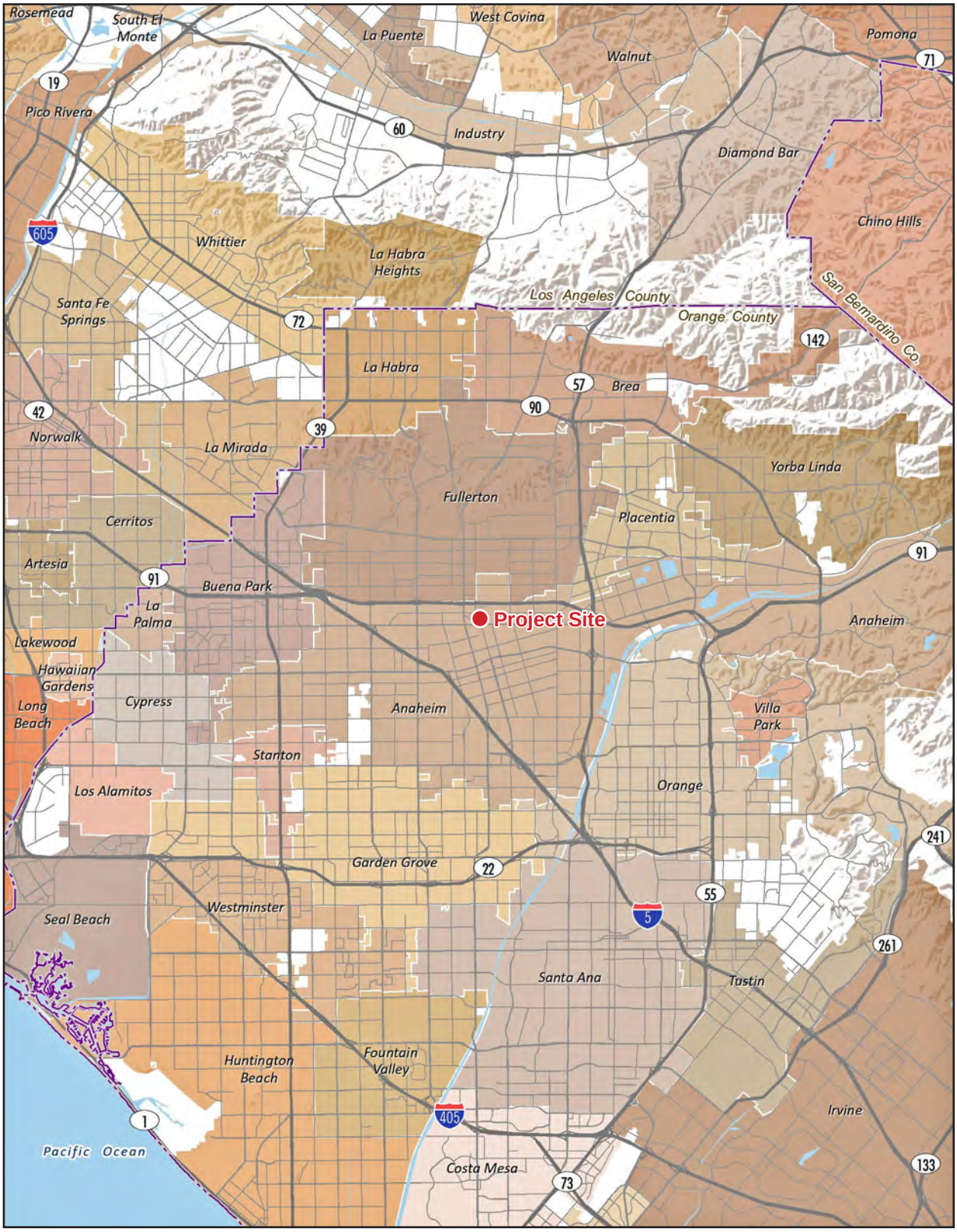
1.2.2 Existing General Plan Land Use and Zoning

Figure 4, *Project Site General Plan Land Use Designation and Zoning*, shows the existing General Plan land use designations and zoning of the Project Site and of the properties immediately surrounding the Project Site. The Project Site has a land use designation of Mixed-Use High under the City of Anaheim's General Plan and is within the Industrial (I) Zone.

1.2.3 Surrounding Land Use

The surrounding uses to the north and east are mostly industrial. The uses to the west across Anaheim Boulevard include a vacant residential triplex and a vacant religious and community assembly use, commercial/light industrial uses and a single-family home; a parking lot for La Palma Park is located further to the west behind these uses. A recycling plant borders the Project Site to the north, and a tile manufacturing business is beyond the recycling plant to the north; a vacant lot currently under construction for the La Palma Village mixed-use residential project borders the Project Site to the south, and across La Palma Avenue to the south are commercial and residential uses. La Palma Dog Park, Glover Stadium, and La Palma Park are approximately 250 feet southwest of the Project Site across Anaheim Boulevard to the west. See Figure 5, *Aerial Photograph*.

Figure 1 - Regional Location



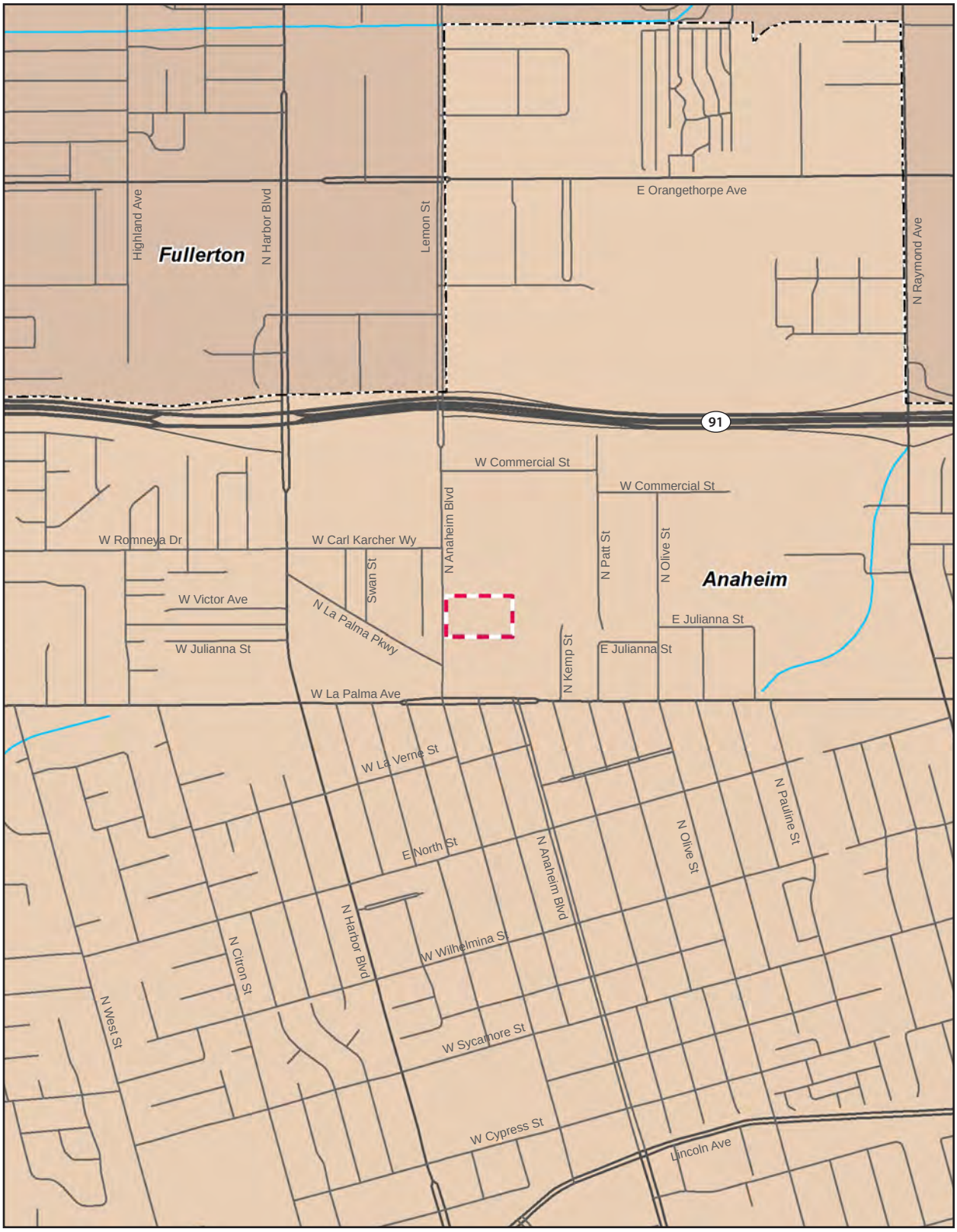
Note: Unincorporated county areas are shown in white.
Source: ESRI, 2020

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Figure 2 - Local Vicinity



Project Boundary

City Boundary

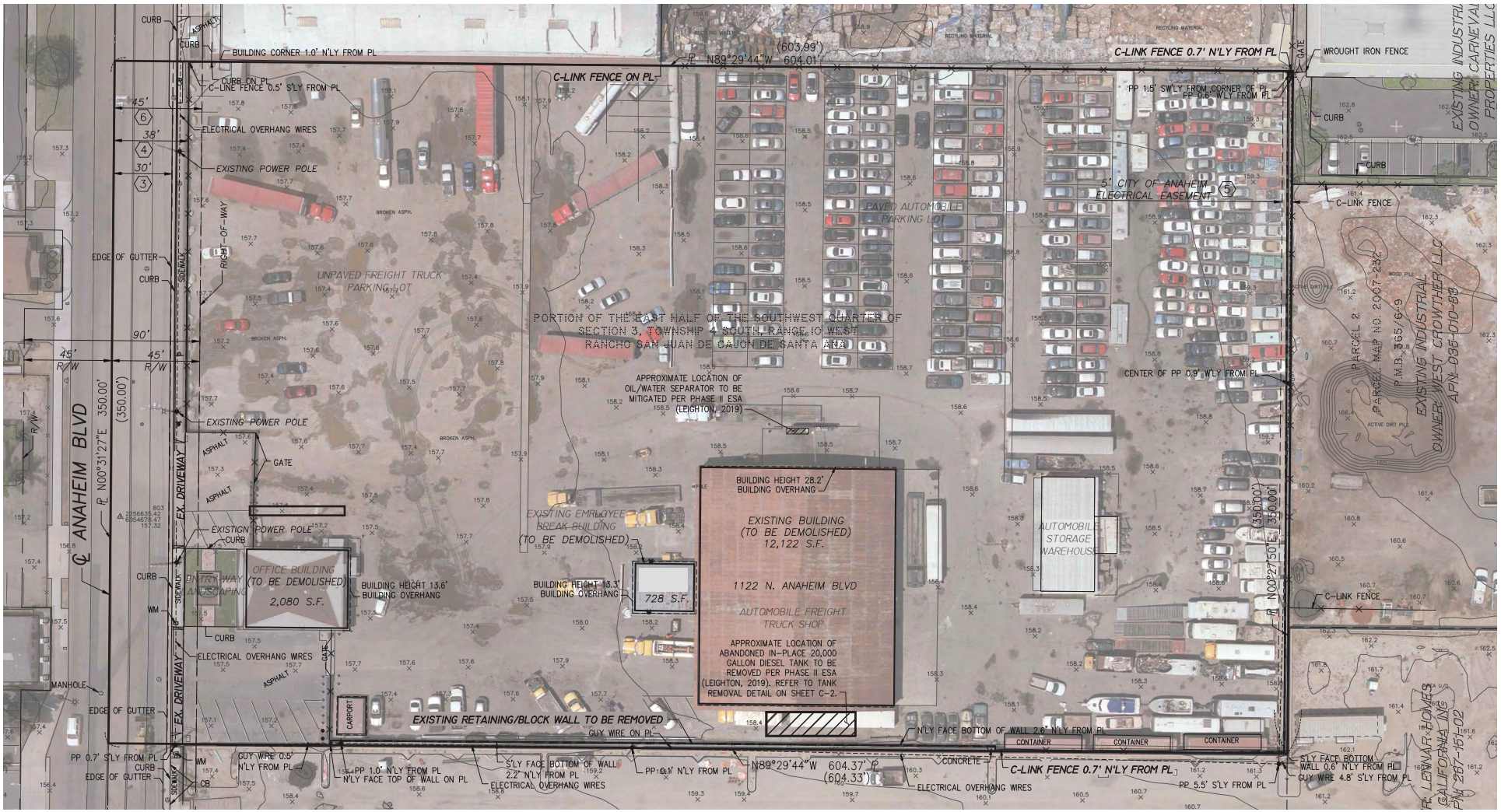
Source: ESRI, 2020

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Figure 3 - Existing Site Conditions



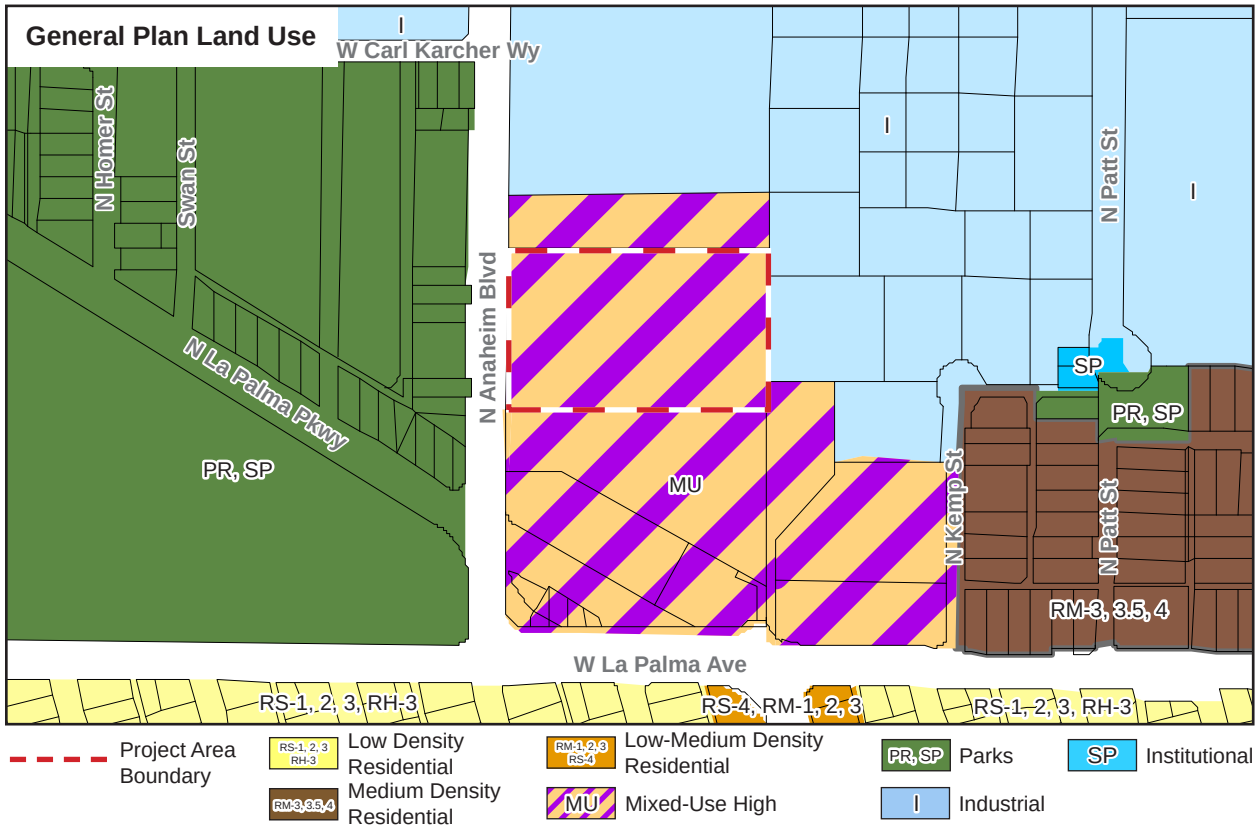
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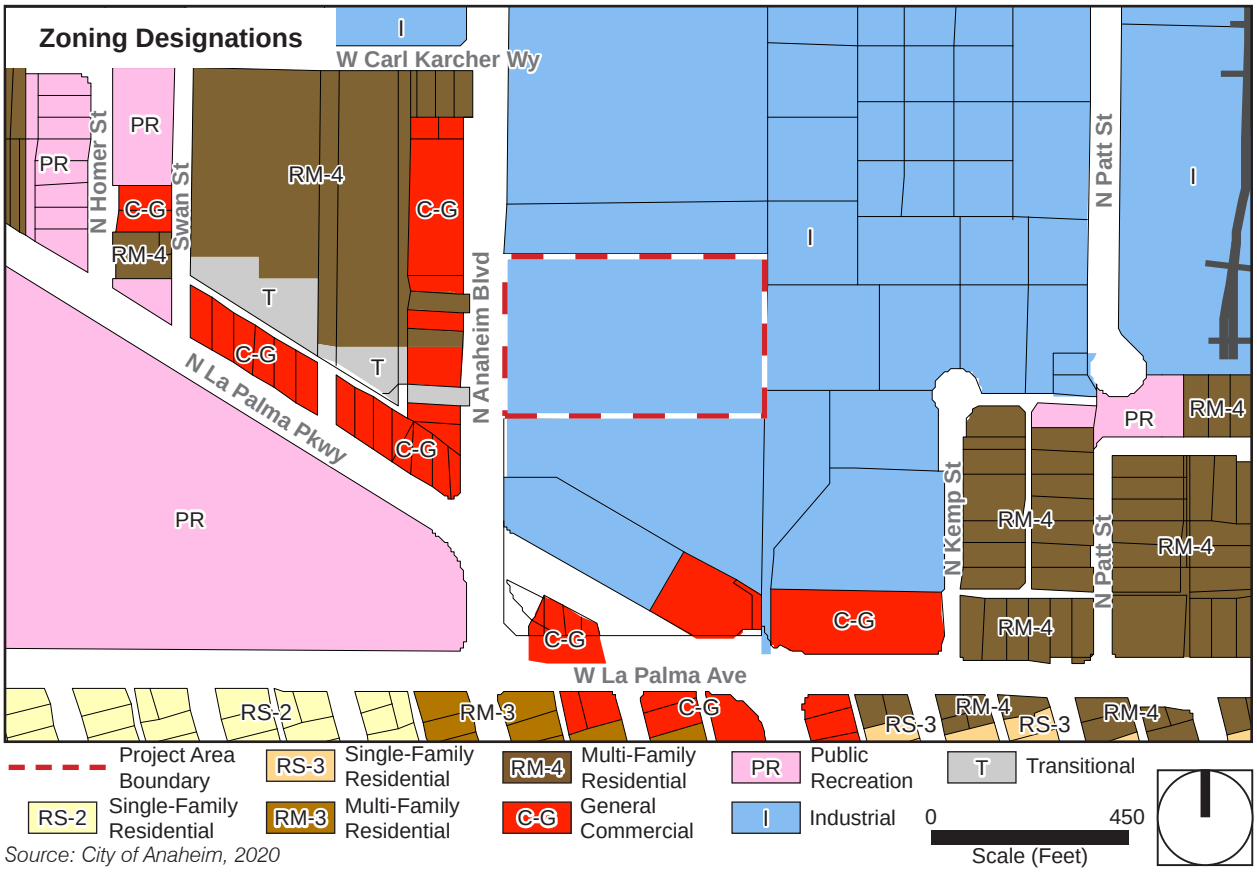
Source: Hunsaker, 2020

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Figure 4 - Project Site General Plan Land Use Designations and Zoning





Source: City of Anaheim, 2020

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Figure 5 - Aerial Photograph



Project Boundary

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Source: Nearmap, 2020

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Bus stops are near the intersection of Anaheim Boulevard and La Palma Avenue, south of the Project Site, and the intersection of Anaheim Boulevard and W. Carl Karcher Way, northwest of the Project Site. Sidewalks and streetlights are located along both sides of Anaheim Boulevard.

As shown in Figure 4, *Project Site General Plan Land Use and Zoning*, the Project Site is surrounded by Mixed-Use High, Parks, and Industrial General Plan Land Use designations, and Industrial (I), General Commercial (G-C), Multiple-Family Residential (RM-4), and Transitional (T) zones.

1.3 PROJECT DESCRIPTION

1.3.1 Proposed City Approvals

This Initial Study will serve as the primary environmental document for all future actions associated with the Proposed Project, including all discretionary approvals requested or required to implement the Proposed Project. The City of Anaheim is the lead agency under CEQA and has the principal approval authority over the Proposed Project. As part of the Proposed Project, the City requires the following discretionary actions and approvals:

- Adoption of a Mitigated Negative Declaration and a Mitigation Monitoring and Reporting Program.
- Approval of a Zoning Reclassification to add the Mixed-Use (MU) Overlay Zone to the existing Industrial (I) Zone.
- Approval of a Development Agreement for a proposed voluntary financial contribution to support the City's affordable housing programs.
- Approval of a Conditional Use Permit to allow a "Dwellings – Multi-Family" 269-unit development in the MU Overlay Zone with modified development standards (see discussion in the following section).

1.3.2 Description of the Project

The Project Applicant proposes to demolish the existing tow yard facility—totaling 16,750 square feet of building space in four buildings, a carport, and associated surface asphalt paving—and construct 269 for-rent multi-family dwelling units, associated infrastructure, and common area improvements on the approximately 4.49-acre Project Site. The Proposed Project would be a wrap-style building with four levels of residential units and common areas totaling 302,011 square feet; and, six levels of parking structure area totaling 226,545 square feet for a combined total of 528,556 square feet of building area. Figure 6, *Proposed Site Plan (Level 1)*, illustrates the proposed site plan for level 1 and Figure 7, C*onceptual Landscape and Amenities Plan*, illustrates conceptual landscape and various common area amenities for the Proposed Project. The Proposed Project would have a density of 60 dwelling units per acre (du/ac), and provide 49 studio units, 119 one-bedroom units, and 101 two-bedroom units ranging from 594 square feet to 1,144 square feet with a net rentable space of 230,103 square feet.

1. Introduction

Figure 8, *West and South Elevations*, and Figure 9, *East and North Elevations*, show that the proposed residential building would be four levels not exceeding 60 feet, and the encased parking structure would be six levels not exceeding 70 feet. Figure 10, *Building Sections*, shows the maximum height for various elements of the Proposed Project. The top of the parapet for the four-level residential building would be 46 feet and 2 inches; the top of the six-level parking structure railing would be 55 feet and 4 inches; and, the top of roof for the elevator core and storage/utility portion of the parking structure would be 64 feet and 5 inches. The Proposed Project would include a landscape buffer and a 5-foot-wide landscaped parkway with street trees in the front setback along Anaheim Boulevard. The Proposed Project would screen the Project Site's northern and eastern perimeters with an eight-foot-tall masonry wall and dense planting. The existing block wall along the southern perimeter would be removed and replaced with a new six-foot-tall block wall.

The proposed setback modifications would require a conditional use permit (CUP) to reduce the front setback from 15 feet to 11.7 feet and allow a 4-foot encroachment for private patios and balconies. The MU Overlay Zone permits balconies to encroach up to 3 feet into the setback area, so this will require a modification of development standards to allow 4 feet. The MU Overlay Zone does not provide for encroachments of patios into required landscape setback areas (15 feet in this case), so a request for modification of development standards is also required. Building-to-building setbacks would be reduced from a 50-foot minimum to a 40.3-foot minimum for primary wall to primary wall separations and a 31.5-foot minimum for balcony separations. The proposed height modifications would increase the maximum building height in the affected area from 42 feet and 6 inches to 53 feet, at the highest point of the building's articulated parapet, for the portion of the Project Site within 200 feet of a residential zone.

The Proposed Project also includes off-site street reconfiguration and roadway improvements within the Anaheim Boulevard right-of-way. The Proposed Project would restripe Anaheim Boulevard and install landscaping and a sidewalk along the Project Site's western boundary.

Recreational Amenities and Open Space

The Proposed Project would provide the following recreational and open spaces, including four courtyards with different themes, game space, two green spaces, club and fitness area, pool courtyard, paseo, and a roof deck totaling 52,790 square feet, as shown in Figure 11, *Recreation and Open Space Plan*:

- The Forecourt: A passive lounging area with garden seating and fireplace.
- Foodie Lounge: An outdoor kitchen and dining area with barbecue station and entertainment/media opportunities.
- The Resort: The pool and spa area off of the clubroom and fitness areas with cabanas and deck area.
- The Social: An indoor/outdoor gathering spot with bar, barbecue station, seating areas, fire feature, and entertainment/media opportunities.
- Game Time: An active game area for outdoor recreation.

In addition to the above recreation amenities, the Proposed Project would provide indoor recreation areas such as a rooftop terrace, clubroom and fitness center, and private patios and balconies.

Access and Parking

Vehicular access to the Project Site would be from one driveway on Anaheim Boulevard near the Project Site's northwest corner. This driveway would bring vehicles to the six-level parking structure at the northern property line. The parking structure would provide one entry; and beyond the parking structure entry, a gated fire access route would provide emergency access along the northern and eastern edge of the Project Site. The northern fire access driveway would provide access to the trash collection area. Figure 12, *Solid Waste Management Plan*, shows trash areas and routes for the trash trucks.

The Proposed Project would provide 527 garage parking spaces—61.25 spaces for the studio units, 238 spaces for the one-bedroom units, and 227.25 spaces for the two-bedroom units—inclusive of the required 68 guest spaces, 16 spaces for electric vehicles, and 11 handicap spaces. The City of Anaheim Municipal Code (AMC) requires the Proposed Project to provide 527 on-site parking spaces.

On- and Off-Site Roadway Improvements

Roadway improvements necessary to provide Project Site access and on-site circulation are to be constructed in conjunction with Project Site development and are required to be in place prior to occupancy. Anaheim Boulevard runs north-south along the Project Site's western boundary. It is currently built at its ultimate full-section width as a secondary arterial (90-foot right-of-way) between the Project Site's northern and southern boundaries. Improvements along Anaheim Boulevard would be those required by final conditions of approval for the Proposed Project and applicable City standards.

The Project Site access improvements at the Anaheim Boulevard and the Project Driveway are described below.

- Anaheim Boulevard & Project Driveway – Install stop control at the driveway exit.
- Implement on-site traffic signing and striping in conjunction with detailed construction plans for the Project Site.
- Review sight distance at each project access point with respect to City of Anaheim standards at the time of preparation of final grading, landscape and street improvement plans.

Soil and Underground Storage Tank Removal

The Project Applicant proposes to remove an abandoned-in-place 20,000-gallon diesel underground storage tank (UST) at the south side of the truck freight shop in compliance with the City of Anaheim Fire & Rescue requirements. The Applicant will also remove approximately 10 feet by 15 feet of Total Petroleum Hydrocarbons (TPH)-impacted soil. The TPH is near the oil/water separator up to an average depth of 6.5 feet, estimated at approximately 36 cubic yards (CY) or 58 tons, as recommended by the Phase II Environmental Site Assessment, dated March 6, 2019, prepared by Leighton and Associates, Inc. Removal of excavated soil from the Project Site would go to an authorized off-site location. Figure 3, *Existing Site Condition,* shows the locations of the 20,000-gallon UST and the oil/water separator.

1.3.3 Project Phasing

Construction of the Proposed Project would occur in one phase, beginning in early 2021 and ending in mid-2023. The Project Applicant anticipates that the demolition of existing structures and grading would take six to seven months; building construction would take approximately two years.

1.4 OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

A responsible agency is a public agency other than the lead agency that has responsibility for carrying out or approving a project (CEQA Guidelines § 15381 and Public Resources Code § 21069). As part of the Proposed Project, the following approvals from responsible agencies are required:

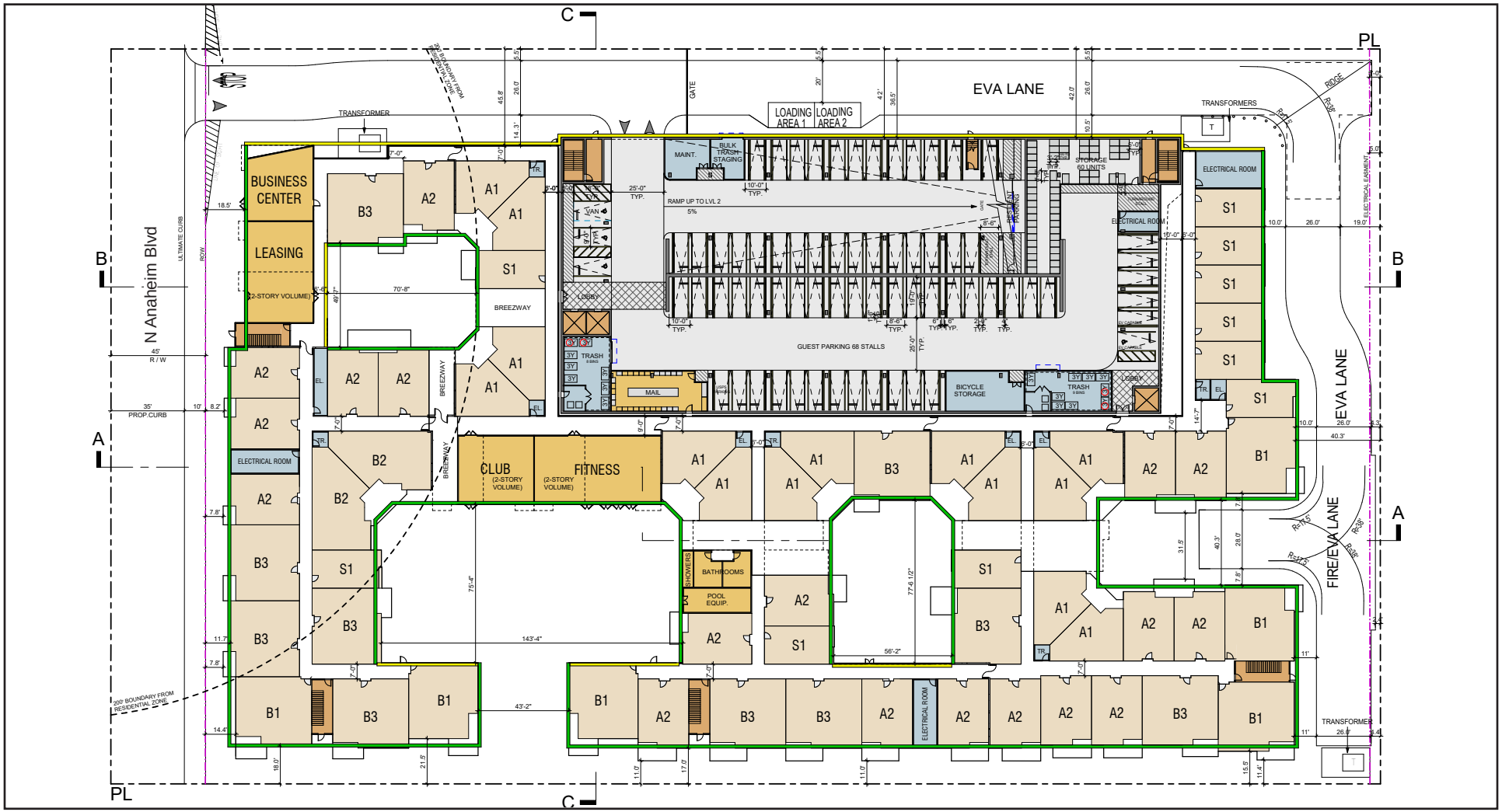
- **Santa Ana Regional Water Quality Control Board:** Compliance with Construction General Permit Order No. 2009-009-DWQ and its subsequent revisions under Order No. 2012-0006-DWQ, and compliance with the National Pollutant Discharge Elimination System Permit. No Further Action letter for the removal of the THP-impacted soil.
- **South Coast Air Quality Management District:** Compliance with Air Quality permits for demolition and construction.
- **City of Anaheim Fire and Rescue:** Permits related to the 20,000-gallon UST removal.

1.5 MITIGATION MONITORING

Public Resources Code, Section 21081.6, requires that agencies adopt a mitigation monitoring or reporting program for any project for which it has made findings pursuant to Public Resources Code 21081 or adopted a Negative Declaration pursuant to 21080(c). Such a program is intended to ensure the implementation of all mitigation measures adopted through the preparation of an EIR or Negative Declaration.

The draft Mitigation Monitoring Program for the Proposed Project is included as Appendix M to this Initial Study, and must be adopted prior to adoption of the mitigated negative declaration for the Proposed Project.

Figure 6 - Proposed Site Plan (Level 1)



Types of Setbacks

- Primary Facade
- Secondary Facade

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Source: TCA Architects, 2020

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Figure 7 - Conceptual Landscape and Amenities Plan



Source: MJS Landscape Architecture, 2020

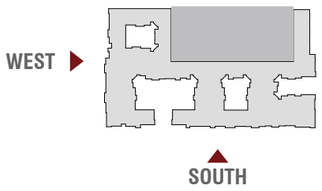
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Figure 8 - West and South Elevations

LEGEND

1. STUCCO
2. COMPOSITE PANELS
3. LAMINATED GLASS RAILING
4. GLASS RAILING
5. METAL PICKET RAILING
6. STOREFRONT
7. PERFORATED SCREEN PANELS







Source: TCA Architects, 2020

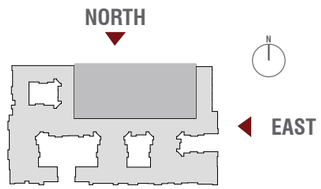
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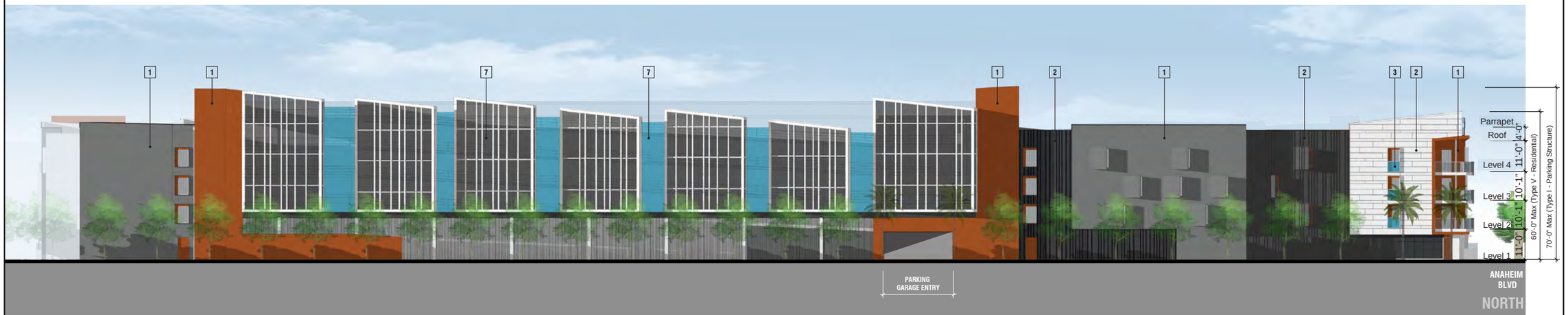
Figure 9 - East and North Elevations

LEGEND

1 STUCCO
2 COMPOSITE PANELS
3 LAMINATED GLASS RAILING
4 GLASS RAILING
5 METAL PICKET RAILING
6 STOREFRONT
7 PERFORATED SCREEN PANELS





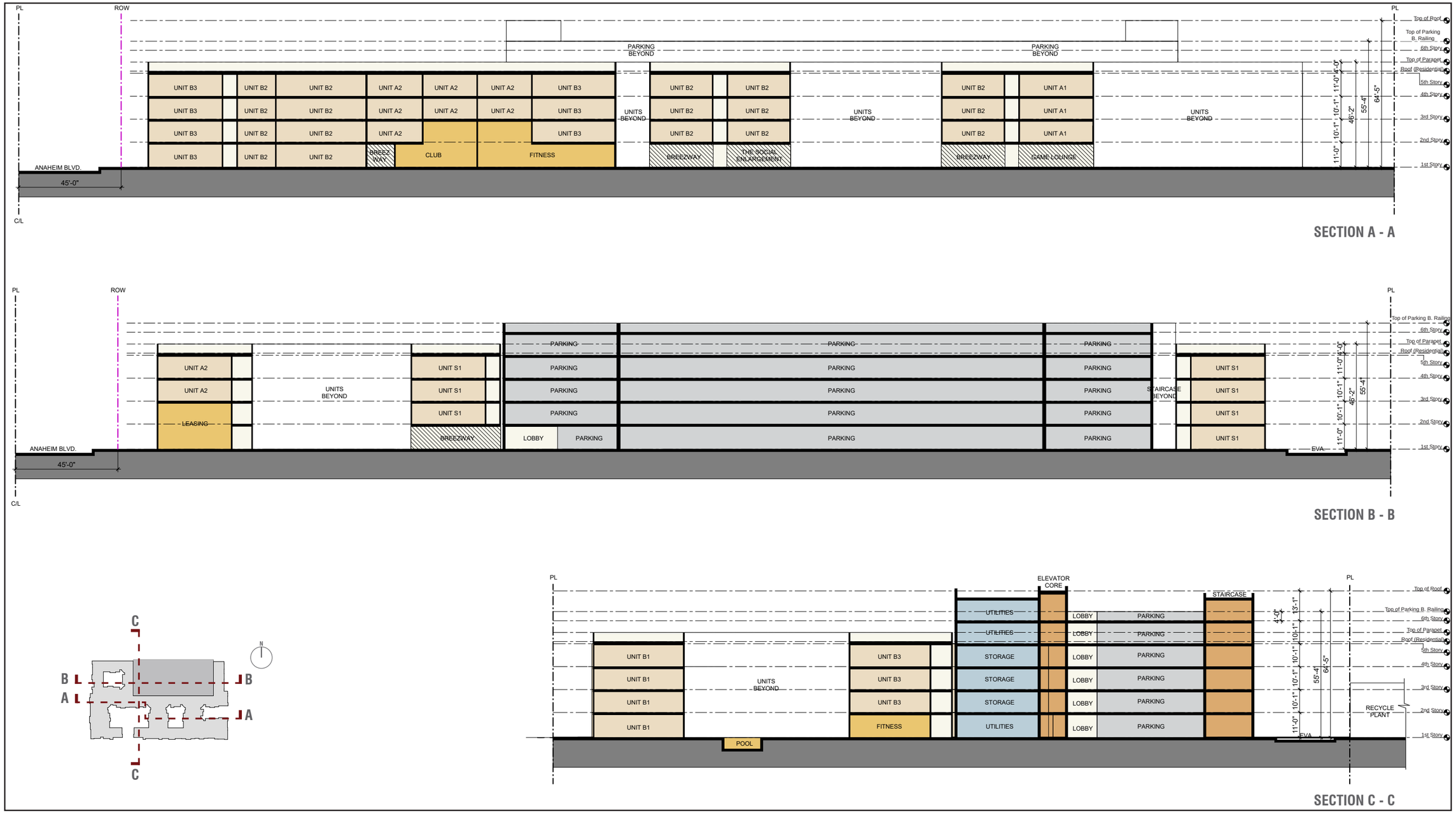


Source: TCA Architects, 2020

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Figure 10 - Building Sections



Source: TCA Architects, 2020

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Figure 11 - Recreation and Open Space Plan



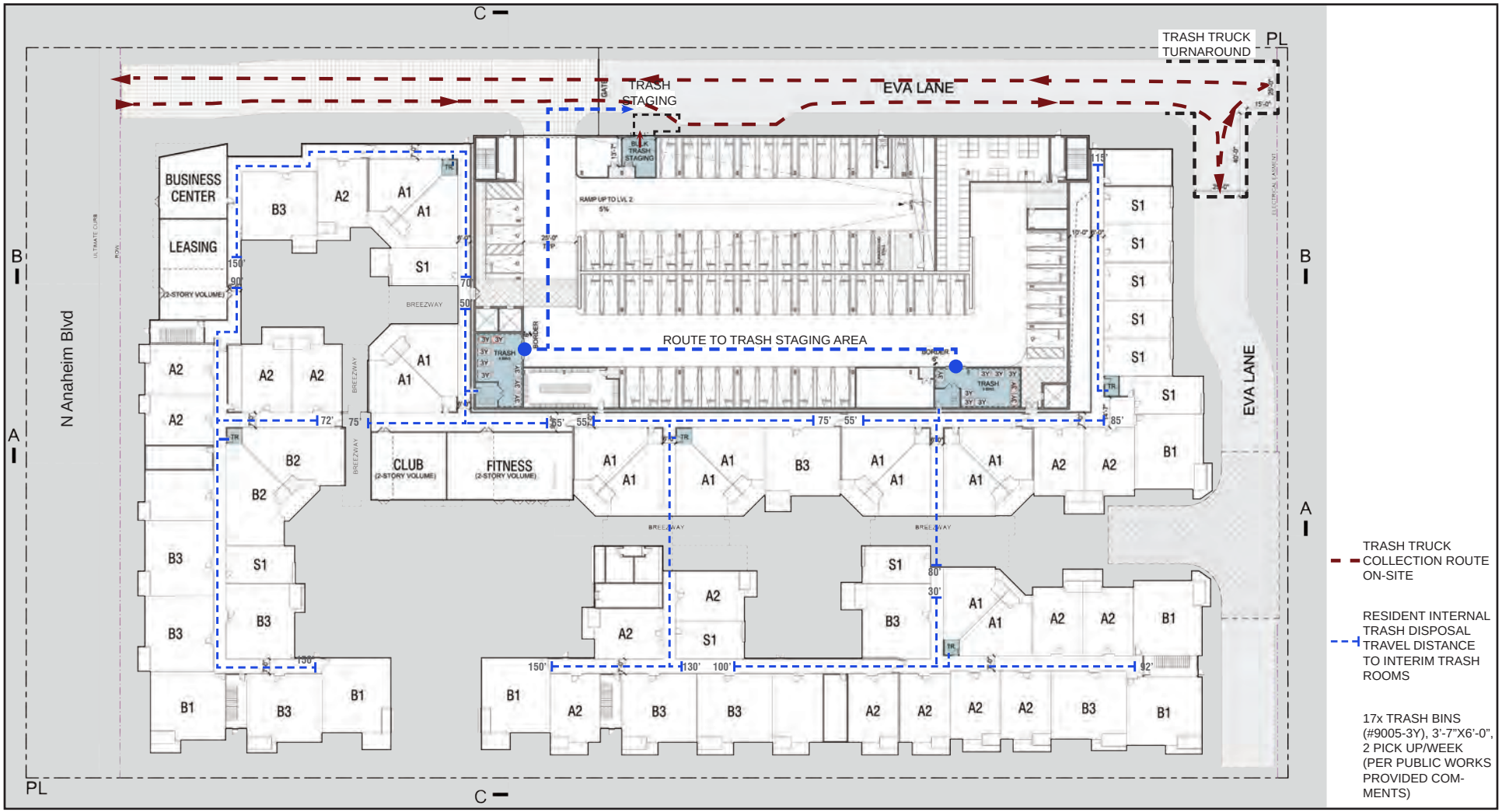
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Source: TCA Architects, 2020

1. Introduction

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Figure 12 - Solid Waste Management Plan



Source: TCA Architects, 2020

1. Introduction

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2. Environmental Checklist

2.1 PROJECT INFORMATION

1. **Project Title:** The Invitation

2. **Lead Agency Name and Address:**
   City of Anaheim
   Department of Planning and Building
   200 South Anaheim Boulevard
   Anaheim, California 92805

3. **Contact Person and Phone Number:**
   Andy Uk, Associate Planner
   (714)765-5238

4. **Project Location:**1122 N. Anaheim Boulevard (APN 035-010-51), approximately 525 feet north of the intersection of La Palma Avenue and Anaheim Boulevard in the City of Anaheim.

5. **Project Sponsor's Name and Address:**
   Renaissance City North Anaheim LLC
   4675 MacArthur Court, Suite 550
   Newport Beach, CA 92660

6. **General Plan Designation:** Mixed-Use High

7. **Zoning:** Industrial (I) Zone

8. **Description of Project:** The Project Applicant proposes to demolish and remove an existing automobile tow yard business to develop a multi-family rental residential project. The Proposed Project would construct a four-story multi-family development, with up to 269 dwelling units, and a six-story parking structure, on a 4.49-acre property at 1122 North Anaheim Boulevard in the City of Anaheim, Orange County, California. In addition, the Proposed Project includes off-site street widening and roadway improvements on Anaheim Boulevard, located adjacent to the Project Site to the west.

9. **Surrounding Land Uses and Setting:** The surrounding uses to the north and east are mostly industrial. The uses to the west across Anaheim Boulevard include a vacant residential triplex and a vacant religious and community assembly use, commercial/light industrial uses and a single-family home; a parking lot for La Palma Park is located further to the west behind these uses. A recycling plant borders the Project Site to the north, and a tile manufacturing business is beyond the recycling plant to the north; a vacant lot currently under construction for the La Palma Village mixed-use residential project borders the Project Site

to the south, and across La Palma Avenue to the south are commercial and residential uses. La Palma Dog Park, Glover Stadium, and La Palma Park are approximately 250 feet southwest of the Project Site across Anaheim Boulevard to the west.

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

- **Santa Ana Regional Water Quality Control Board:** Compliance with Construction General Permit Order No. 2009-009-DWQ and its subsequent revisions under Order No. 2012-0006-DWQ, and compliance with the National Pollutant Discharge Elimination System Permit. No Further Action letter for the removal of the THP-impacted soil.
- **South Coast Air Quality Management District:** Compliance with Air Quality permits for demolition and construction.
- **City of Anaheim Fire and Rescue:** Permits related to the 20,000-gallon UST removal.

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

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

City staff contacted the California Native American Heritage Commission to request a list of California Native American tribes traditionally and culturally affiliated with the project area. On March 30, 2020, pursuant to Assembly Bill (AB) 52, the City notified tribal groups who submitted a letter requesting notification and received a consultation request from one tribe; Gabrieleño Band of Mission Indians - Kizh Nation. As such, the City consulted with the Gabrieleño Band of Mission Indians - Kizh Nation on April 14, 2020. City staff and the Gabrieleño Band of Mission Indians - Kizh Nation deemed the consultation complete on April 15, 2020. Therefore, the City has complied with AB 52.

2.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

2.3 DETERMINATION (TO BE COMPLETED BY THE LEAD AGENCY)

On the basis of this initial evaluation:

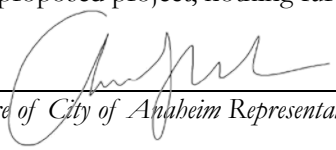
☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

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

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

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

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



Signature of City of Anaheim Representative

August 5, 2020
Date

Andy Uk, Associate Planner
Printed Name/Title

714-765-5238
Phone Number

2.4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

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

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

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

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

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

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

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

2. Environmental Checklist

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

9. The explanation of each issue should identify:

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

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

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

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

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

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

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

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				**X**
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				**X**
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				**X**
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				**X**
XXI. MANDATORY FINDINGS OF SIGNIFICANCE.				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			**X**	
b) Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?			**X**	
c) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)			**X**	
d) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			**X**	

2. Environmental Checklist

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3. Environmental Analysis

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

3.1 AESTHETICS

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

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

No Impact. The Anaheim General Plan Green Element provides goals and policies guiding the preservation of scenic vistas and other scenic amenities. The Green Element identifies the contours of the Hill and Canyon Area, the Santa Ana Mountains, golf courses, and the Santa Ana River as scenic and visual amenities. Goal 2.1 of the Green Element states, "Preserve views of ridgelines, natural open space, and other scenic vistas wherever possible." To achieve this goal, the Green Element discusses four policies:

- Control infill development on visually significant ridgelines, canyon edges, and hilltops;
- Encourage development that preserves natural contours and views of existing backdrop ridgelines or prominent views;
- Site parks and other open space amenities to take advantage of natural vistas; and,
- Encourage future development and public improvements to maximize private and public views of golf course fairways.

The Dad Miller Golf Course is over two miles from the Project Site on the west side of the I-5 freeway, the Santa Ana River is over three miles to the east, and the Hill and Canyon Area is over five miles to the east on the east side of SR-55. The Project Site is developed and operating as a tow yard with generally flat topography. There are no scenic amenities or scenic features visible from the Project Site. The Project Site is in a highly urbanized area, and industrial, commercial, residential, recreational, and religious and community facility uses surround it. The Project Site is not within the City's Scenic Corridor Overlay Zone. Development of the Proposed Project would not block views from any ridgeline or visual amenities. No impact on a scenic vista would occur.

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

No Impact. The Project Site is not located along a state scenic highway as identified by Caltrans nor a City-designated scenic expressway, as shown in Figure C-1 of the City's Circulation Element (Caltrans 2017;

3. Environmental Analysis

Anaheim 2018). The nearest state-designated scenic highway from the Project Site is over five miles to the east—SR-91 (Riverside Freeway) between SR-55 (Costa Mesa Freeway) and Weir Canyon Road. The nearest scenic expressway from the Project Site is Santa Ana Canyon Road between Lakeview Avenue and Imperial Highway, six miles to the east. The Proposed Project would not damage any scenic resources within a state scenic highway. No impact would occur.

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

Less Than Significant Impact. The Project Site currently consists of three single-story industrial buildings totaling 14,930 square feet (i.e., 2,080-square-foot office building, 728-square-foot employee break building, and 12,122-square-foot freight truck shop), covered work area, carport, and surface asphalt paving. Ornamental landscaping consists of approximately 630 square feet of grass at the entryway, and there are no trees. Figure 5, *Aerial Photograph,* shows the existing conditions at the Project Site. The Project Site is in a highly urbanized area, and does not have a unique visual character that the City requires property owners to protect or preserve. There are various residential, commercial, industrial, and community and religious facility buildings of different sizes and shapes adjacent to and across the street from the Project Site, including a recycling center that adjoins the Project Site to the north. The Project Site and the surrounding area do not contain any comprehensive or cohesive design features.

As shown in the site plan (Figure 6) and elevation views (Figures 8 and 9), the Proposed Project consists of a four-level residential structure that encases a six-level parking structure on three sides—east, west, and south. Anaheim Boulevard is the Project Site's only street frontage, and the nearest sensitive uses are the residential units across Anaheim Boulevard, approximately 80 feet west of the Project Site. An additional potential sensitive use is La Palma Village, a mixed-use residential development, which borders the Project Site to the north and is currently under construction. The six-level parking structure would not negatively affect these residential uses; it would be adjacent to the industrial uses to the north. In addition, the elevation views show that the Proposed Project would be of quality design that avoids monotonous lines and breaks up bulky massing to create visual interest.

The Project Site has a General Plan land use designation of Mixed-Use High and is within the Industrial (I) Zone. The Project Applicant is requesting a Zone Reclassification to add the Mixed Use (MU) Overlay Zone to Project Site. The MU Overlay Zone implements the Mixed-Use High General Plan land use designation. The Project Applicant proposes to modify the setback requirements through approval of a Conditional Use Permit (CUP). Modifications involve reducing the front setback from 15 feet to 11.7 feet with a 4-foot encroachment for private patios, reducing building-to-building setback from a 50-foot minimum to a 40.3 feet minimum for primary wall to primary wall separations and a 31.5-foot minimum for balcony to balcony separations, and increasing the maximum building height from 42 feet and 6 inches to 53 feet for the portion of the Project Site within 200 feet of a residential zone. The MU Overlay Zone would allow these modifications subject to the approval of a CUP; therefore, if approved, the Proposed Project would not conflict with applicable zoning and other regulations governing scenic quality.

The General Plan Green Element and Community Design Element provide goals and policies that govern scenic quality. The Green Element outlines four objectives, one of which is "Beautify arterial corridors with landscape plans, edge treatments and gateways." The Community Design Element provides goals that govern landscaping along major arterial corridors, attractive design for multifamily housing, design for midblock developments, and design consistency with immediate surroundings. The Circulation Element identifies Anaheim Boulevard as a secondary arterial. The Proposed Project would provide an attractive street frontage along this arterial corridor through the proposed landscaping and building design along Anaheim Boulevard. The Proposed Project includes off-site improvements on the east side of Anaheim Boulevard including a new sidewalk and landscaping, in accordance with City standards and guidelines. Therefore, the Proposed Project would be consistent with the General Plan's Green and Community Design elements, and no significant impacts to scenic quality of the Project Site would occur.

The Proposed Project would comply with the City's landscaping and screening standards outlined in Chapter 18.46 of the AMC. The purpose of this chapter is to define landscaping, screening and irrigation standards to enhance the aesthetic appearance of the City, minimize graffiti opportunities, preserve privacy and security, and conserve water (pursuant to AMC Section 18.46.010). The Proposed Project would not conflict with the zoning regulations governing scenic quality.

Based on the discussion above, the Proposed Project would be consistent with applicable zoning and other regulations governing scenic quality. Therefore, the Proposed Project would result in a less than significant impact.

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

Less Than Significant Impact. Nighttime illumination and glare impacts are the effects of a development's exterior lighting on adjoining uses and areas. Light reflecting off passing cars and large expanses of glass windows or other reflective surfaces can also generate glare. Excessive light and/or glare can impair vision, cause annoyance, affect sleep patterns, and cause safety hazards for drivers.

Excessive Light

The Proposed Project would include pathway lights to illuminate walking paths, landscape decorative lighting, perimeter pole lighting, and other exterior lighting, as shown in Figure 13, *Landscape Lighting Plan*. The intention of outdoor lighting is to provide levels of lighting sufficient to meet safety and orientation needs. According to the lighting plan, lighting for the public area would not involve any blinking or highly intensive lights; instead, it would be warm in color and unobtrusive, with lighting sources concealed from a public viewpoint where appropriate. The design of the lighting for the Proposed Project would direct light sources so that spill light does not fall outside of its intended area, where feasible.

The Proposed Project does not include exterior lighting along the Anaheim Boulevard street frontage; however, there is an existing street light. In addition, interior building lights, which may be visible through windows facing Anaheim Boulevard, would create new light sources in the area. However, lighting would be typical of residential uses and would not adversely affect surrounding properties. Considering the existing sources of

lighting in surrounding areas, including headlights along Anaheim Boulevard, streetlights, and exterior lighting from neighboring properties, the amount and intensity of nighttime lighting proposed on-site would not adversely affect the existing nighttime views in the area. Therefore, nighttime lighting from the Proposed Project would be less than significant.

Glare

The Project Site is in an urbanized area of the City; existing glare comes from sunlight reflecting off vehicles parked and traveling on nearby roads, and glass and light-colored building materials. Even though the Proposed Project would add to these glare sources, the Proposed Project's architectural treatment and building materials would not be highly reflective and would not produce significant glare impacts. Glare from building materials and vehicles are typical of residential development and other urban uses in the area. Therefore, impacts from the Proposed Project would be less than significant.

3.2 AGRICULTURE AND FORESTRY RESOURCES

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

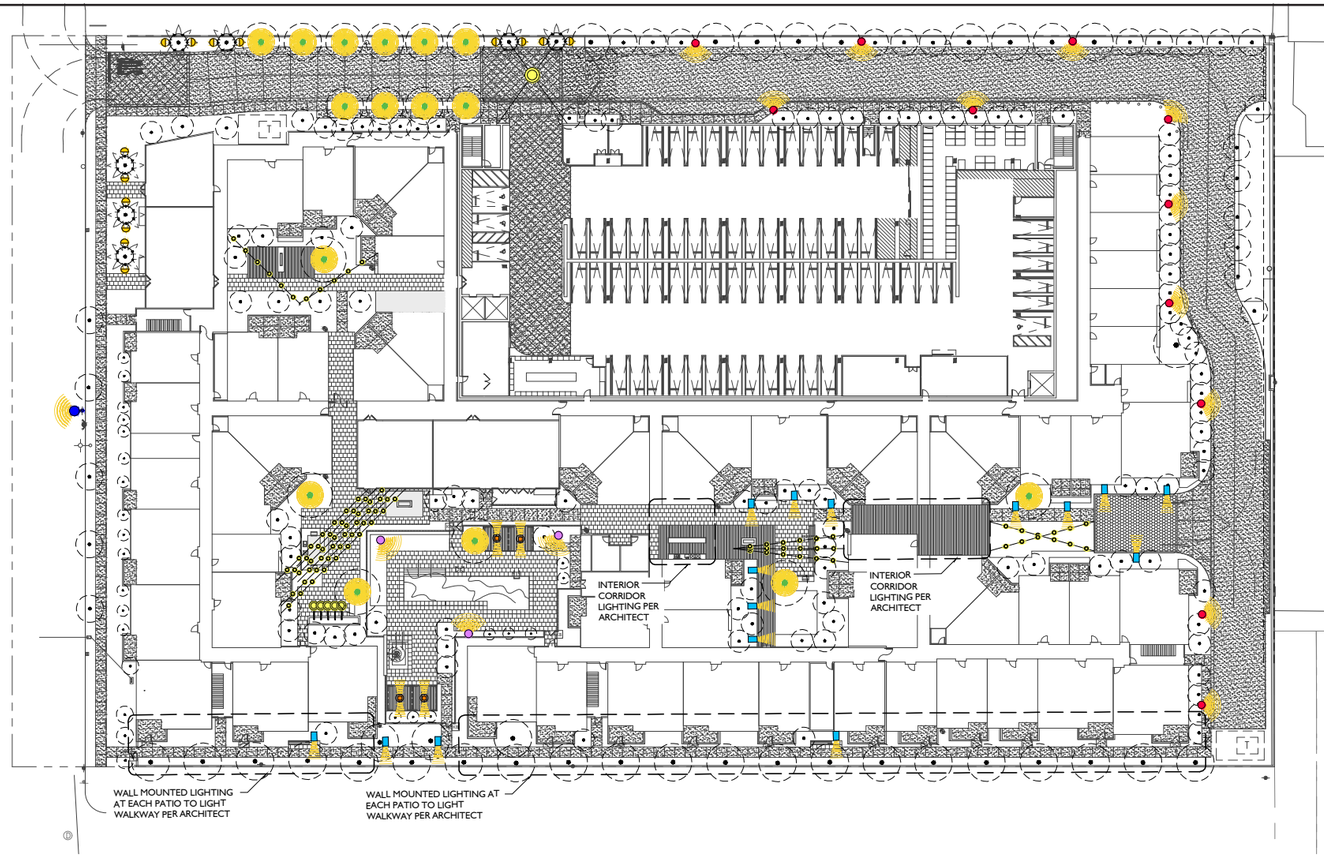
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The Project Site is fully developed and is operating as an automobile tow yard surrounded by industrial, commercial, residential, and community and religious facility uses. The California Department of Conservation's (DOC) Farmland Mapping and Monitoring Program (FMMP) maps California's agricultural resources and determines the suitability of land throughout the state for agriculture purposes. The DOC produces these maps on a statewide level and by county. The DOC's FMMP map for Orange County identifies the Project Site as "Urban and Built-Up Land." The Project Site is in the Industrial (I) zone, and is not zoned or being use for agriculture. Therefore, development on the Project Site would not convert prime farmland, unique farmland, or farmland of statewide importance to a nonagricultural use. No impact would occur.

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

No Impact. The Project Site has a General Plan land use designation of Mixed-Use High and is in the Industrial (I) Zone. Therefore, the Proposed Project would not conflict with an existing zone for agricultural use or conflict with a Williamson Act contract. No impact would occur.

Figure 13 - Landscape Lighting Plan



GENERAL SITE LIGHTING NOTES

1. CONTRACTOR SHALL STUB OUT ELECTRICAL CONDUIT TO SPECIMEN TREES/PALMS PRIOR TO PLANTING. ALL FIXTURES SHALL BE MOUNTED AFTER INSTALLATION OF SPECIMEN PLANT MATERIAL.
2. ALL LIGHTING FIXTURES AND ELECTRICAL INSTALLATION SHALL BE IN CONFORMANCE WITH THE NATIONAL ELECTRICAL CODES AND LOCAL GOVERNMENT AGENCY.
3. CONTRACTOR SHALL VERIFY LOCATION OF ALL UTILITIES PRIOR TO CONSTRUCTION AND SHALL BE HELD LIABLE FOR ALL DAMAGES INCURRED.
4. THE CONTRACTOR SHALL OBTAIN ALL NECESSARY PERMITS REQUIRED TO PERFORM THE WORK INDICATED HEREIN BEFORE BEGINNING WORK.
5. ALL CONSTRUCTION SHALL CONFORM TO THE CURRENT UNIFORM BUILDING CODES, PERMIT REQUIREMENTS AND STATE AND HEALTH SAFETY REQUIREMENTS.
6. ALL ELECTRICAL FIXTURES ARE SHOWN SCHEMATICALLY FOR LOCATIONS AND QUANTITIES REQUIRED. CONTRACTOR SHALL VERIFY EXISTING CONDITIONS PRIOR TO CONSTRUCTION AND INSTALL FIXTURES PER MANUFACTURERS SPECIFICATIONS.
7. CONTRACTOR SHALL PROVIDE AND INSTALL ALL NECESSARY CONDUIT THROUGH THE PODIUM DECK AND PLANTER WALLS AND UNDER PAVING PRIOR TO CONSTRUCTION.

LANDSCAPE LIGHTING CONCEPT

THE OUTDOOR LIGHTING CONCEPT IS TO PROVIDE LEVELS OF LIGHTING SUFFICIENT TO MEET SAFETY AND ORIENTATION NEEDS.

WITHIN PUBLIC AREAS LIGHTING WILL BE WARM COLORED AND UNOBTRUSIVE. LIGHT SOURCES WILL BE LEED.

LIGHTING SOURCES FOR THE LANDSCAPE AND PAVED AREAS WILL BE CONCEALED AND THE LIGHTING INDIRECT NOT VISIBLE FROM A PUBLIC VIEWPOINT. LIGHT SOURCES SHOULD BE DIRECTED SO THAT IT DOES NOT FALL OUTSIDE THE AREA TO BE LIGHTED.

ALL EXTERIOR SURFACE AND ABOVE-GROUND MOUNTED FIXTURES WILL BE SYMPATHETIC AND COMPLIMENTARY TO THE ARCHITECTURAL THEME.

WALL MOUNTED FIXTURES WILL HAVE OPAQUE GLASS AND BE FITTED WITH LAMPS NOT EXCEEDING 60 WATTS.

LIGHT FIXTURE LEGEND:

SYMBOL	TYPE / LOCATION	MANUFACTURER / MODEL #	LAMP/LOAD	ACCESSORIES / NOTES
	DOWN LIGHT at CABANAS	WAC: FM-W2605-WT	16 W LED	FINISH: TBD
	12' POLE LIGHT at PERIMETER	T.B.D	T.B.D	T.B.D
	STAKE MOUNTED LANDSCAPE LIGHT (2 PER TREE)	FOCUS INDUSTRIES: RXD-02-BLT	20 WATT	FINISH: BLACK (-BLT)
	12' POLE LIGHT at POOL	T.B.D	T.B.D	T.B.D
	EXISTING STREET LIGHT			
	PALM MOUNTED UPLIGHT	T.B.D	T.B.D	T.B.D
	BOLLARD at PEDESTRIAN PATHWAYS	T.B.D	T.B.D	T.B.D

SYMBOL	TYPE / LOCATION	MANUFACTURER / MODEL #	LAMP	ACCESSORIES / NOTES
	FESTIVAL STRING LIGHTS at COURTYARDS	TOKISTAR LIGHTING: EXBK-6-VI-S14-C	1.8W / 24 VAC	FINISH: BLACK (BK)
	ARM LIGHT at COURTYARD	T.B.D	T.B.D	T.B.D
	PENDANT LIGHT at ENTRY DRIVE	T.B.D	T.B.D	T.B.D

SYMBOL INDICATES PROPOSED TREE or PALM LOCATION



PENDANT at DRIVEWAY



BOLLARD at PATHWAYS



12' POLE LIGHT at PERIMETER



12' POOL LIGHT at POOL

0 75
Scale (Feet)

Source: MJS Landscape Architecture, 2020

3. Environmental Analysis

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

No Impact. The Project Site has a General Plan land use designation of Mixed-Use High and is in the Industrial (I) Zone. The Project Site is not zoned for nor used as forest land or timberland. The Proposed Project would not conflict with existing zoning or cause the rezoning of forest land or timberland. Therefore, no impact would occur.

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

No Impact. The Project Site is in an urbanized area in the City surrounded by industrial, commercial, residential, and community and religious facility uses. The Project Site is fully developed and paved except for a small patch of landscaping at the entryway, and therefore does not contain forest land. Development of the Proposed Project would not result in the loss of forest land or the conversion of forest land to nonforest use. No impact would occur.

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

No Impact. The Project Site is fully developed and operating as an automobile tow yard. The Project Site is surrounded by industrial, commercial, residential, and community and religious facility uses. FMMP characterizes the Project Site as "Urban and Built-Up Land." The development of the Proposed Project would not result in the conversion of farmland to nonagricultural uses nor the conversion of forest land to nonforest uses. No impact would occur.

3.3 AIR QUALITY

This air quality section addresses the impacts of the Proposed Project on ambient air quality and the exposure of people, especially sensitive individuals, to unhealthful pollutant concentrations. A background discussion on the air quality regulatory setting, meteorological conditions, existing ambient air quality in the vicinity of the Project Site (SCAQMD Monitoring Station 16), and air quality modeling can be found in Appendix A to the Initial Study.

The primary air pollutants of concern for which ambient air quality standards (AAQS) have been established are ozone (O_3), carbon monoxide (CO), coarse inhalable particulate matter (PM_{10}), fine inhalable particulate matter ($PM_{2.5}$), sulfur dioxide (SO_2), nitrogen dioxide (NO_2), and lead (Pb). The federal and California Clean Air Act classify areas as either in attainment or nonattainment for each criteria pollutant based on whether the AAQS have been achieved. The South Coast Air Basin (SoCAB), which is managed by the South Coast Air Quality Management District (South Coast AQMD), is designated nonattainment for O_3, and $PM_{2.5}$ under the California and National AAQS, nonattainment for PM_{10} under the California AAQS, and nonattainment for lead (Los Angeles County only) under the National AAQS (CARB 2017b).

3. Environmental Analysis

Furthermore, the South Coast AQMD has identified regional thresholds of significance for criteria pollutant emissions and criteria air pollutant precursors, including volatile organic compounds (VOC), CO, nitrogen oxides (NOx), sulfur oxides (SOx), PM_{10}, and $PM_{2.5}$. Projects below the regional significance thresholds are small enough that regional air quality models used to determine ozone levels might not detect their regional impact on ambient ozone levels. South Coast AQMD does not expect development projects that are below the regional significance thresholds to generate sufficient criteria pollutant emissions to violate any air quality standard or contribute substantially to an existing or projected air quality violation. Therefore, such projects would not result in significant health-based air quality impacts. Where available, air quality analysis in CEQA documents may rely on the significance criteria established by the South Coast AQMD to make the following determinations. Would the project:

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

Less Than Significant Impact. The South Coast AQMD adopted the 2016 Air Quality Management Plan (AQMP) on March 3, 2017. South Coast AQMD uses regional growth projections to forecast future emission levels in the SoCAB. For southern California, the Southern California Association of Governments (SCAG) provides these regional growth projections partially based on land use designations included in city/county general plans. Typically, only large, regionally significant projects have the potential to affect the regional growth projections. In addition, the consistency analysis is generally only required in connection with a jurisdiction's adoption of general plans and specific plans, and approval of significant projects.

The Proposed Project would involve demolition, site preparation, and grading on the 4.86-acre lot and adjacent roadway improvement area. The majority of the site would be disturbed during site preparation and grading activities. It would also involve constructing residential housing units, architectural coating, and paving asphalt and nonasphalt surfaces. Section 15206(b) of the CEQA Guidelines states that a project is of statewide, regional, or area-wide significance if the project would involve a net increase of over 500 residential dwelling units. The Project Applicant proposes development of a residential community with up to 269 dwelling units, providing more housing options for the local community. Thus, the CEQA Guidelines would not consider the Proposed Project a project of statewide, regional, or area wide significance that would require intergovernmental review under Section 15206 of the CEQA Guidelines. Therefore, the Proposed Project would not have the potential to make a substantial impact on SCAG's growth projections. Additionally, as demonstrated below in Section 3.3(b), the construction and operational phases of the Proposed Project would generate regional emissions below the South Coast AQMD emissions thresholds; therefore, the South Coast AQMD would not consider it a substantial source of air pollutant emissions with the potential to affect the attainment designations in the SoCAB. Therefore, the Proposed Project would not affect the regional emissions inventory or conflict with strategies in the AQMP. Impacts would be less than significant.

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

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

Regional Short-Term Construction Impacts

The Proposed Project would result in the construction of a 269-unit residential development that would take approximately 31 months. Construction of the Proposed Project would generate criteria air pollutants associated with construction equipment exhaust and fugitive dust from demolition, site preparation, grading, building construction, architectural coating, and pavement of asphalt and nonasphalt surfaces. The Proposed Project's construction-related emissions—shown in Table 1, *Maximum Daily Regional Construction Emissions*—are quantified using the California Emissions Estimator Model, version 2016.3.2.25 (CalEEMod), and are based on the construction schedule and equipment mix for the project provided by the Applicant. The table shows that air pollutant emissions from construction-related activities would be less than their respective South Coast AQMD regional significance threshold values. Therefore, air quality impacts from project-related construction activities would be less than significant.

Table 1 Maximum Daily Regional Construction Emissions

Construction Phase	Pollutants (lb/day)[1, 2,3]					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Year 2021						
Building Demolition	1	14	7	<1	1	1
Building Demolition and Haul	1	16	8	<1	2	1
Building Demolition Haul	1	16	8	<1	2	1
Building Demolition Haul and Asphalt Demolition	1	14	7	<1	1	1
Asphalt Demolition	1	4	4	<1	<1	<1
Asphalt Demolition and Asphalt Reprocessing	2	14	8	<1	1	1
Asphalt Reprocessing	1	4	4	<1	<1	<1
Asphalt Reprocessing and Site Preparation	3	32	18	<1	5	3
Asphalt Reprocessing and Site Preparation/Soil Haul	4	41	24	<1	5	3
Asphalt Reprocessing, Site Preparation/Soil Haul, and Grading	4	46	26	<1	8	5
Asphalt Reprocessing and Grading	4	42	22	<1	8	5
Grading	4	39	17	<1	8	4
Grading/Grading Soil Haul	4	52	24	<1	8	5
Grading/ Grading Soil Haul and Utility Trenching	5	50	28	<1	8	5
Utility Trenching	1	11	10	<1	1	<1
Utilities Trenching and Building Construction 2021	7	54	55	<1	6	3
Building Construction 2021	5	43	45	<1	6	3
Year 2022						
Building Construction 2022	5	39	44	<1	5	3
Building Construction 2022 and Architectural Coating 2022	34	41	48	<1	6	3
Year 2023						
Building Construction 2023 and Architectural Coating 2023	34	36	46	<1	6	3
Building Construction 2023, Architectural Coating 2023, and Asphalt Paving	36	57	58	<1	7	3
Building Construction 2023, Architectural Coating 2023, Asphalt Paving, and Finishing/Landscaping	36	61	64	<1	7	4

3. Environmental Analysis

Table 1 Maximum Daily Regional Construction Emissions

Construction Phase	Pollutants (lb/day)[1, 2,3]					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Building Construction 2023, Architectural Coating 2023, and Finishing/Landscaping	34	40	52	<1	6	3
Maximum Daily Construction Emissions						
Maximum Daily Emissions	36	61	64	<1	8	5
South Coast AQMD Regional Construction Threshold	75	100	550	150	150	55
Significant?	No	No	No	No	No	No

Source: CalEEMod Version 2016.3.2.25.
Emissions totals may not equal 100 percent due to rounding.
1 Based on the preliminary information provided by the Applicant. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by the South Coast AQMD of construction equipment.
2 Includes implementation of fugitive dust control measures required by the South Coast AQMD under Rule 403, including watering disturbed areas a minimum of two times per day, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186–compliant sweepers.
3 Assumed equipment used during overlapping phases would not be shared to provide the most conservative estimate.

Regional Long-Term Operation-Phase Impacts

Typically, projects generate long-term air pollutant emissions from area sources (e.g., landscape fuel use, aerosols, architectural coatings, and asphalt pavement), energy use (natural gas), and mobile sources (i.e., on-road vehicles). The Proposed Project would result in new residential development with internal roads and paved and landscaped surfaces. The Project Applicant would, at a minimum, design and build the proposed units to meet the 2019 Building Energy Efficiency Standards and the 2019 California Green Building Standards Code (CALGreen). Table 2 compares the total operational emissions associated with the existing facility on the Project Site to the total operational emissions associated with the Proposed Project. As shown in Table 2, *Maximum Daily Regional Operation Emissions*, emissions from operation of the Proposed Project would be minimal and would not exceed the South Coast AQMD regional operation-phase significance thresholds when compared to baseline emissions in 2023. Therefore, impacts to the regional air quality associated with operation of the project would be less than significant.

Table 2 Maximum Daily Regional Operation Emissions

Source	Maximum Daily Emissions (lbs/day)					
	VOC	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Existing Conditions Emissions						
Area	<1	<1	<1	<1	<1	<1
Energy[1]	<1	<1	<1	<1	<1	<1
Mobile	1	3	8	<1	3	1
Total	1	3	8	<1	3	1
Proposed Project Emissions						
Area	8	<1	22	<1	<1	<1
Energy[1]	<1	1	<1	<1	<1	<1
Mobile	5	4	47	<1	16	4
Total	13	5	69	<1	16	4
Net Emissions[2]						
Area	8	<1	22	<1	<1	<1
Energy[1]	<1	1	<1	<1	<1	<1
Mobile	4	1	39	<1	13	3
Total	12	2	61	<1	13	4
South Coast AQMD Regional Threshold	55	55	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

Source: CalEEMod Version 2016.3.2.25. Highest winter or summer emissions report.
Notes: lbs: Pounds.
[1] For purposes of this analysis, the proposed residential units are assumed to be designed and built to meet the 2019 Building Efficiency Standards and CALGreen Code based on information provided by the Applicant.
[2] Net emissions compare the Proposed Project emissions to a baseline "no project" scenario in the buildout year of 2023.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact With Mitigation Incorporated. The following describes changes in localized impacts from short-term construction activities and long-term operation of the Proposed Project.

Construction

Localized Construction Impacts

A project could expose sensitive receptors to elevated pollutant concentrations during construction activities if it would cause or contribute significantly to elevated levels of criteria air pollutants. Unlike the mass of construction emissions shown in the regional emissions analysis in Table 1, which is described in pounds per day, localized concentrations refer to an amount of pollutant in a volume of air (ppm or $\mu g/m^3$) and can be correlated to potential health effects. The screening-level localized significance thresholds (LSTs) are the amount of project-related emissions at which localized concentrations (ppm or $\mu g/m^3$) could exceed the California AAQSs for criteria air pollutants for which the SoCAB is designated nonattainment. The Project Site's size and distance to the nearest sensitive receptor are the basis for determining LSTs. The California AAQS are the most stringent and provide a margin of safety in the protection of the public health and welfare. The screening-level LSTs are designed to protect sensitive receptors most susceptible to further respiratory

3. Environmental Analysis

distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise.

Air pollutant emissions generated by construction activities would cause temporary increases in air pollutant concentrations. Table 3, *Construction Emissions Compared to the Screening-Level LSTs*, shows the maximum daily construction emissions (pounds per day) during on-site construction activities compared with the South Coast AQMD's screening-level LSTs for sensitive receptors within 82 feet (25 meters). Table 3 shows that the construction of the Proposed Project would not generate construction-related on-site emissions that would exceed the screening-level LSTs for NO_X and CO, but would exceed LSTs for PM_{10} in the grading phase and PM_{10} and $PM_{2.5}$ in the overlapping asphalt reprocessing and grading phase.

Table 3 Construction Emissions Compared to the Screening-Level LSTs

	Pollutants(lbs/day)[1]			
Construction Activity	NO_X	CO	PM_{10}[2]	$PM_{2.5}$[2]
South Coast AQMD ≤1.00 -acre LST	81	485	4	3
Building Demolition	14	7	1	1
Building Demolition and Haul	14	7	1	1
Building Demolition Haul	14	7	1	1
Building Demolition Haul and Asphalt Demolition	14	7	1	1
Asphalt Demolition	3	4	<1	<1
Asphalt Demolition and Asphalt Reprocessing	14	8	1	1
Asphalt Reprocessing	3	4	<1	<1
Utility Trenching	11	10	<1	<1
Exceeds LST?	No	No	No	No
South Coast AQMD 1.50-Acre LSTs	98	600	5	3
Building Construction 2021	35	33	2	2
Building Construction 2022	31	33	2	2
Building Construction 2022 and Architectural Coating 2022	33	35	2	2
Building Construction 2023 and Architectural Coating 2023	22	30	5	2
Exceeds LST?	No	No	No	No
South Coast AQMD 2.00-Acre LSTs	115	715	6	4
Asphalt Reprocessing and Site Preparation	32	18	5	3
Exceeds LST?	No	No	No	No
South Coast AQMD 2.50-Acre LSTs	126	805	7.16	4.50
Asphalt Reprocessing and Grading	42	21	7.69	4.63
Grading	39	17	7.48	4.42
Utilities Trenching and Building Construction 2021	46	43	2.37	2.22
Building Construction 2023, Architectural Coating 2023, and Finishing/Landscaping	34	40	1.65	1.55
Exceeds LST?	No	No	Yes	Yes

Table 3 Construction Emissions Compared to the Screening-Level LSTs

Construction Activity	Pollutants(lbs/day)[1]			
	NO_X	CO	PM_{10}[2]	$PM_{2.5}$[2]
South Coast AQMD 3.00-Acre LSTs	138	894	8	5
Asphalt Reprocessing and Site Preparation/Soil Haul	35	22	5	3
Exceeds LST?	No	No	No	No
South Coast AQMD 3.50-Acre LSTs	149	984	9	5
Asphalt Reprocessing, Site Preparation/Soil Haul, and Grading	45	26	8	5
Grading/Grading Soil Haul	42	21	8	5
Grading/ Grading Soil Haul and Utility Trenching	49	27	8	5
Building Construction 2023, Architectural Coating 2023, and Asphalt Paving	51	46	2	2
Exceeds LST?	No	No	No	No
South Coast AQMD 4.50-Acre LSTs	172	1,163	12	6
Building Construction 2023, Architectural Coating 2023, Asphalt Paving, and Finishing/Landscaping	55	51	2	2
Exceeds LST?	No	No	No	No

Source: CalEEMod Version 2016.3.2.25, and South Coast AQMD 2008 and 2011.
Notes: In accordance with South Coast AQMD methodology, only onsite stationary sources and mobile equipment occurring on the Project Site are included in the analysis. LSTs are based on receptors within 82 feet (25 meters) of the Project Site in Source Receptor Area (SRA) 17.
[1] Based on information provided by the Applicant. Where specific information regarding project-related construction activities or processes was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by the South Coast AQMD.
[2] Includes implementation of fugitive dust control measures required by South Coast AQMD under Rule 403, including watering disturbed areas a minimum of two times per day, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186–compliant sweepers.

However, watering all exposed ground surfaces and disturbed areas a minimum of three times per day during grading activities could reduce construction-related emissions to below their respective PM_{10} and $PM_{2.5}$ LSTs. Table 4, *Mitigated Construction Emissions Compared to the Screening-Level LSTs*, shows the emissions with the implementation of Mitigation Measure AQ-1.

Table 4 Mitigated Construction Emissions Compared to the Screening-Level LSTs

Construction Activity	Pollutants(lbs/day)[1,2]			
	NO_X	CO	PM_{10}[3]	$PM_{2.5}$[3]
South Coast AQMD **≤1.00** -acre LST	81	485	4	3
Building Demolition	14	7	1	1
Building Demolition and Haul	14	7	1	1
Building Demolition Haul	14	7	1	1
Building Demolition Haul and Asphalt Demolition	14	7	1	1
Asphalt Demolition	3	4	<1	<1
Asphalt Demolition and Asphalt Reprocessing	14	8	1	1
Asphalt Reprocessing	3	4	<1	<1
Utility Trenching	11	10	<1	<1
Exceeds LST?	No	No	No	No

3. Environmental Analysis

Table 4 Mitigated Construction Emissions Compared to the Screening-Level LSTs

Construction Activity	Pollutants(lbs/day)[1,2]			
	NO_X	CO	PM_{10}[3]	$PM_{2.5}$[3]
South Coast AQMD 1.50-Acre LSTs	98	600	5	3
Building Construction 2021	35	33	2	2
Building Construction 2022	31	33	2	2
Building Construction 2022 and Architectural Coating 2022	33	35	2	2
Building Construction 2023 and Architectural Coating 2023	22	30	5	2
Exceeds LST?	No	No	No	No
South Coast AQMD 2.00-Acre LSTs	115	715	6	4
Asphalt Reprocessing and Site Preparation	32	18	5	3
Exceeds LST?	No	No	No	No
South Coast AQMD 2.50-Acre LSTs	126	805	7.16	4.50
Asphalt Reprocessing and Grading	42	21	6.91	4.24
Grading	39	17	6.70	4.03
Utilities Trenching and Building Construction 2021	46	43	2.37	2.22
Building Construction 2023, Architectural Coating 2023, and Finishing/Landscaping	34	40	1.65	1.55
Exceeds LST?	No	No	No	No
South Coast AQMD 3.00-Acre LSTs	138	894	8	5
Asphalt Reprocessing and Site Preparation/Soil Haul	35	22	5	3
Exceeds LST?	No	No	No	No
South Coast AQMD 3.50-Acre LSTs	149	984	9	5
Asphalt Reprocessing, Site Preparation/Soil Haul, and Grading	45	26	7	4
Grading/Grading Soil Haul	42	21	7	4
Grading/ Grading Soil Haul and Utility Trenching	49	27	7	4
Building Construction 2023, Architectural Coating 2023, and Asphalt Paving	51	46	2	2
Exceeds LST?	No	No	No	No
South Coast AQMD 4.50-Acre LSTs	172	1,163	12	6
Building Construction 2023, Architectural Coating 2023, Asphalt Paving, and Finishing/Landscaping	55	51	2	2
Exceeds LST?	No	No	No	No

Source: CalEEMod Version 2016.3.2.25, and South Coast AQMD 2008 and 2011.

Notes: In accordance with South Coast AQMD methodology, only onsite stationary sources and mobile equipment occurring on the Project Site are included in the analysis. LSTs are based on receptors within 82 feet (25 meters) of the Project Site in Source Receptor Area (SRA) 17.

1 Based on information provided by the Applicant. Where specific information regarding project-related construction activities or processes was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by the South Coast AQMD.

2 Includes implementation of fugitive dust control measures required by South Coast AQMD under Rule 403, including reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186–compliant sweepers.

3 Mitigation Measure AQ-1, which would require watering disturbed areas three times per day during grading activities, would reduce PM_{10} and $PM_{2.5}$ for all construction activities that include grading.

Thus, with incorporation of the mitigation measure, project-related construction activities would not have the potential to expose sensitive receptors to substantial pollutant concentrations. Therefore, localized air quality impacts from construction activities would be less than significant with mitigation incorporated.

Health Risk

The South Coast AQMD currently does not require health risk assessments for short-term emissions from construction equipment. Emissions from construction equipment primarily consist of diesel particulate matter (DPM). The California Office of Environmental Health Hazard Assessment (OEHHA) adopted new guidance for the preparation of health risk assessments in March 2015 (OEHHA 2015). It also developed a cancer risk factor and noncancer chronic reference exposure level for DPM based on continuous exposure over a 30-year period. The South Coast AQMD has not developed short-term acute exposure levels for DPM and currently does not require the evaluation of long-term excess cancer risk or chronic health impacts for a short-term project. Development of the Proposed Project would last approximately 31 months. The relatively short duration—when compared to a 30-year period—would limit exposures of on- and off-site receptors. In addition, exhaust emissions from off-road vehicles associated with overall project-related construction activities would not exceed the screening-level LSTs. For these reasons, the analysis in this document anticipates that construction emissions would not pose a threat to off-site receptors near the Proposed Project, and project-related construction health impacts would be less than significant.

Carbon Monoxide Hotspots

Areas of vehicle congestion have the potential to create pockets of CO called hotspots. These pockets have the potential to exceed the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9.0 ppm. Because vehicle combustion produces CO in the greatest quantities that do not readily disperse into the atmosphere, an analysis of localized CO concentrations typically demonstrates adherence to AAQS. Vehicle emissions produce hotspots at intersections where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds.

The SoCAB has been designated attainment under both the national and California AAQS for CO. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—in order to generate a significant CO impact (BAAQMD 2017). Operation of the Proposed Project would generate up to 118 PM peak hour trips, (or an increase of 87 PM peak hour trips compared to existing uses) which would be minimal compared to these screening levels. Therefore, the project would not have the potential to substantially increase CO hotspots at intersections in the vicinity of the Project Site, and impacts would be less than significant.

Mitigation Measure

Construction

AQ-1 Prior to issuance of any demolition or grading permit, the Project Applicant shall submit evidence to the Planning and Building Department showing compliance with SCAQMD Rule #403. The evidence shall demonstrate that the construction bid specifies that exposed ground

> surfaces and disturbed areas shall be watered a minimum of three times per day during construction activities that include grading to minimize fugitive dust. This evidence shall include notes on all construction plans, clearly showing the watering requirement to control fugitive dust, or as otherwise deemed as appropriate by the Planning and Building Director.

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

Less Than Significant Impact. South Coast AQMD Rule 402, Nuisance, is the threshold for odor. A project exceeds this threshold if it creates an odor nuisance pursuant to South Coast AQMD Rule 402, Nuisance, which states:

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

The type of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. The Proposed Project does not fall within these land uses.

During the development of the Proposed Project, emissions from construction equipment, such as diesel exhaust, may generate odors. However, these odors would be low in concentration, temporary, disperse rapidly, and would not affect a substantial number of people. Any odors produced during the construction phase would not be significant or highly objectionable. During operations, the Proposed Project would include on-site trash receptacles, which would have potential to produce nuisance odors. In addition, the Proposed Project would include an outdoor fireplace and outdoor kitchen for cooking activities. However, the Proposed Project would comply with AMC 18.38.130.60 and would comply with South Coast AQMD Rule 402. Therefore, impacts would be less than significant.

3.4 BIOLOGICAL RESOURCES

Would the project:

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

No Impact. Special status species include those listed as endangered or threatened under the federal Endangered Species Act or California Endangered Species Act; species otherwise given certain designations by the California Department of Fish and Wildlife (CDFW); and plant species listed as rare by the California Native Plant Society. The Project Site consists of industrial buildings and paved surfaces except for limited

ornamental landscaping at the entryway. The existing ornamental landscape areas do not provide natural habitat for special status species, and the existing development precludes use of the Project Site by sensitive species. No impact would occur.

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

No Impact. The Project Site is currently operating as a tow yard with paved and unpaved surface parking lots and associated buildings. The Project Site does not contain any riparian habitat or other sensitive natural community. No watercourse runs through or adjacent to the Project Site. No riparian habitat exists on-site (USFWS 2019a). No impact would occur.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The Project Site consists of a tow yard with no natural habitat or wetlands. No watercourse runs through or adjacent to the Project Site. No wetland habitat exists on-site (USFWS 2020a). Therefore, no impact would occur.

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

No Impact. The Project Site is currently an industrial use, which is fully developed, and surrounded by urban uses in a highly urbanized area of Anaheim. No critical habitat exists on site (USFWS 2020b). The Project Site contains no trees, and there is no other vegetation except for small ornamental landscaping comprised of grass at the entryway.

When removing trees or vegetation, in compliance with California Fish and Game Code Sections 3503, 3503.5, 3513, and 3800, the Proposed Project is required to avoid the incidental loss of fertile eggs, nestlings, or activities that lead to nest abandonment. However, the Project Site has no place that birds could potentially nest. Therefore, the Proposed Project would not be subject to pre-construction nesting bird surveys in accordance with CDFW requirements. Due to lack of suitable vegetation on the Project Site, implementation of the Proposed Project would not interfere substantially with the movement of any native resident or wildlife species or with established native resident or migratory wildlife corridors. Therefore, no impact would occur.

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

No Impact. The Project Site is not in the City's Scenic Corridor Overlay Zone, and the Project Site does not contain any trees. Implementation of the Proposed Project would not conflict with the City's Tree Preservation Ordinance (AMC Section 18.18.040). AMC Chapter 13.12 establishes applicable regulations for the protection, maintenance, removal, and replacement of street trees within the City's right-of-way. The Proposed Project

includes street improvements on Anaheim Boulevard. However, the Proposed Project would not remove street trees on Anaheim Boulevard, and therefore would not conflict with the City's street tree ordinance (AMC Chapter 13.12). No impact would occur.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The Project Site is not in the area of the Orange County Central and Coastal Natural Community Conservation Plan/Habitat Conservation Plan or any other habitat conservation plan (CDFW 2020). No impact would occur.

3.5 CULTURAL RESOURCES

Would the project:

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

No Impact. Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or the lead agency. Generally, Section 15064.5 considers a resource "historically significant" if it meets one of the following criteria:

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

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

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

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

The Project Site is not within a national or local historic district (Anaheim 2010). Neither the California Register of Historical Resources nor the National Register of Historic Places lists include the Project Site (OHP 2020; NPS 2020). It does not contain any recorded built-environment resources according to a South Central Coastal Information Center (SCCIC) records search (Appendix B to the Initial Study). Therefore, no impact to historic resources would occur.

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

Less Than Significant Impact With Mitigation Incorporated. A cultural records search was performed through the SCCIC (see Appendix B), and no documented archaeological resources were identified in the project area. A records search did not identify any resources on or adjacent to the Project Site.

The Project Site has been developed and operated as an industrial use since at least 1947, and the likelihood of discovering an archaeological resource is low. Based on the records search and the condition of the Project Site, the Project Site is not within an area that is sensitive for significant or important cultural resources. Although the potential for discovery is low, the potential for subsurface discovery of previously unidentified archaeological resources still exists, and customary caution and a halt-work condition during ground-disturbing activities would be necessary. Implementation of Mitigation Measure CUL-1 would ensure that if the Project Applicant encounters archaeological resources at the Project Site, impacts would be less than significant.

Mitigation Measure

CUL-1 Prior to issuance of Grading or Building Permits, the Project Applicant shall provide a note on plans submitted to the Planning and Building Department indicating that in the event that the Project Applicant discovers any evidence of cultural resources during ground-disturbing activities, all work within the vicinity of the find shall stop until a qualified archaeological consultant can assess the find and make recommendations. The Project Applicant shall not attempt excavation of potential cultural resources. If the Project Applicant discovers any evidence of cultural resources during ground-disturbing activities, the qualified archaeologist shall ensure that the Proposed Project complies with the following measures.

- Prior to any ground disturbance, the qualified archaeologist, or their designee, shall provide a worker environmental awareness protection (WEAP) training to construction personnel regarding regulatory requirements for the protection of cultural (prehistoric and historic) resources. As part of this training, construction personnel shall receive proper procedures to follow if there is the discovery of unanticipated cultural resources during construction. Workers will have contact information and protocols to follow in the event of any inadvertent discoveries. The WEAP training can be in the form of a video or PowerPoint presentation. The training may include printed literature (handouts) distributed to new workers and contractors to avoid continuous training over the course of the construction.
- In the event that the Project Applicant encounters unanticipated cultural material during any phase of project construction, all construction work within 50 feet (15 meters) of the find shall cease, and the qualified archaeologist shall assess the find for importance. Construction activities may continue in other areas. If, in consultation with the City, the discovery is determined not to be important, work will be permitted to continue in the area.

- If the qualified archaeologist determines a resource to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the qualified archaeologist shall coordinate with the Project Applicant and the City to develop a formal treatment plan. The plan should serve to reduce impacts to the resources and allow construction to proceed. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Section 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment.
- If the qualified Archaeologist makes the determination that preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource and subsequent laboratory processing and analysis.
- The Project Applicant shall offer any historic archaeological material that is not Native American in origin for curation at a public, nonprofit institution with a research interest in the materials, such as the South Central Coastal Information Center at California State University, Fullerton. If no institution accepts the archaeological material, the Project Applicant shall donate the archaeological material to a local school or historical society in the area for educational purposes, as determined appropriate by the City.

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

Less Than Significant Impact. There are no known human remains or cemeteries on the Project Site or adjoining properties. The Project Site was vacant and undeveloped in 1938, and by 1947, consisted of the current industrial buildings. The likelihood that the Project Applicant would discover human remains during site clearing and grading activities is extremely low.

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

Compliance with existing law regarding the discovery of human remains would reduce potential impacts to human remains to a less-than-significant level. No mitigation measures are necessary.

3.6 ENERGY

Would the project:

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

Less Than Significant Impact. A significant impact would occur if the Proposed Project resulted in a wasteful, inefficient, or unnecessary consumption of energy.

Construction

Electricity

Construction of the Proposed Project would require electricity use to power the construction equipment. The electricity use during construction would vary during different phases of construction—the majority of construction equipment during demolition and grading would be gas or diesel powered, and the later construction phases would require electricity-powered equipment for interior construction and architectural coatings. The use of electricity would be temporary and would fluctuate according to the phase of construction. Additionally, this analysis anticipates that the majority of electric-powered construction equipment would be smaller tools (e.g., power drills, table saws, compressors) and lighting, which would result in minimal electricity usage during construction activities. Therefore, project-related construction activities would not result in wasteful or unnecessary electricity demands, and impacts would be less than significant.

Natural Gas Energy

This analysis does not anticipate that natural gas would power construction equipment for the Proposed Project, and no natural gas demand would occur during construction. Therefore, there is no impact with respect to natural gas usage.

Transportation Energy

Transportation energy use depends on the type and number of trips, vehicle miles traveled, fuel efficiency of vehicles, and travel mode. Transportation energy used during construction of the Proposed Project would come from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction employee vehicles that would use diesel fuel and/or gasoline. It is anticipated that the majority of off-road construction equipment, such as those used during grading activities, would be gas or diesel powered consistent with CARB's "In-Use Off-Road Diesel Fueled Fleet" requirements. The use of energy resources by these vehicles would be temporary; it would fluctuate according to the phase of construction and cease upon completion of project construction. Thus, impacts related to transportation energy use during construction would be temporary and would not require expanded energy supplies or the construction of new infrastructure.

3. Environmental Analysis

To limit wasteful and unnecessary energy consumption, the construction contractors would minimize nonessential idling of construction equipment in accordance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9. In addition, electrical energy would be available for use during construction from existing power lines and connections, which would minimize or avoid the use of less efficient generators. Furthermore, construction trips would not result in unnecessary use of energy since nearby regional freeway systems provide the most direct and shortest routes from various areas of the region (e.g., I-5 and SR-91). Overall, construction fuel associated with the Proposed Project would not be any more inefficient, wasteful, or unnecessary than similar development projects. Therefore, impacts would be less than significant with respect to transportation energy during construction.

Operation

Operation of the Proposed Project would create additional demands for electricity and natural gas compared to existing conditions, and would result in increased transportation energy use. Operational use of energy would include heating, cooling, and ventilation of buildings; water heating; operation of electrical systems, use of on-site equipment and appliances; and lighting. The City of Anaheim Public Utilities Department (APUD) provides electricity to Anaheim residences and businesses. APUD obtains its power supply from a range of nonrenewable and renewable sources (APUD 2019). SoCalGas provides natural gas services to the City.

Electrical Energy

Operation of the existing facility consumes electricity for various purposes, including but not limited to heating, cooling, and ventilation of buildings; water heating; operation of electrical systems; lighting; and use of on-site equipment and appliances. Table 5, *Building Electricity and Natural Gas Consumption,* shows electricity consumption for the Proposed Project.

Table 5 Building Electricity and Natural Gas Consumption

Land Use	Electricity (kWh/year)	Natural Gas (kBTU/year)
Proposed Project		
Residential	1,054,850	2,596,930
Parking Lot	1,061,140	0
Total	2,115,990	2,596,930

Source: CalEEMod Version 2016.3.2.
Notes: kWh=kilowatt hour; kBTU=1,000 British thermal units

APUD would provide electrical service to the Proposed Project through connections to existing off-site electrical lines and new on-site infrastructure. As shown in the table, electricity use associated with the Proposed Project would total 2,115,990 kilowatt hours per year (kWh/year) (or 2,116 MWh/year). APUD has the capacity to provide 3,343,892 megawatts per hour (MWh) annually, and sold 3,298,340 MWh to its customers in 2018 (APUD 2019). Therefore, APUD has a remaining capacity of 45,552 MWh, and the Proposed Project would represent approximately 4.6 percent of the remaining capacity. Although the Proposed Project would increase energy demand at the Project Site compared to existing conditions, it would be required to comply with the applicable Building Energy Efficiency Standards and CALGreen. Because the Proposed Project would be

consistent with the regulatory requirements, it would not result in wasteful or unnecessary electricity demands. Therefore, the Proposed Project would not result in a significant impact related to electricity.

Natural Gas Energy

Table 5, *Building Electricity and Natural Gas Consumption*, shows natural gas consumption associated with the Proposed Project. As seen in the table, natural gas demand would total 2,596,930 kilo-British thermal units per year (kBTU/year) or 7,115 kBTU/day with the Proposed Project due to consumption from the residential units. SoCalGas has facilities throughout Anaheim and the Southern California region. The service area of SoCalGas spans much of the southern half of California, from Imperial County, on the southeast, to San Luis Obispo County, on the northwest, to part of Fresno County, on the north, to Riverside County and most of San Bernardino County, on the east (CEC 2015b). In 2018, SoCalGas had a natural gas supply of 3,055 million cubic feet per day (MMcf/day), and total natural gas consumption in SoCalGas's service area was 1,971 MMcf/day (CGEU 2018; CEC 2019b). Therefore, in 2018 the available natural gas supply was 1,084 MMcf/day. In terms of energy output, one thousand cubic feet (Mcf) of gas is equal to approximately 1,036 kBTU (USEIA 2020). Based on the natural gas supply available in 2018, this analysis can assume that SoCalGas has adequate natural gas supplies in the SoCalGas service area to accommodate the Proposed Project. Furthermore, the Proposed Project would be required to comply with the California Building Energy and Efficiency Standards (Title 24, Part 6) and CALGreen (Title 24, Part 11), as amended by AMC Chapter 15.03; therefore, it would not result in wasteful or unnecessary natural gas demands. This analysis bases the availability of natural gas service on present gas supply and regulatory policies. As a public utility, SoCalGas is under the auspices of the California Public Utilities Commission (CPUC) and federal regulatory agencies. If these agencies take any action that affects gas supply or the conditions under which service is available, gas service would continue in accordance with revised conditions. Therefore, operation of the Proposed Project would result in less than significant impacts with respect to natural gas usage.

Transportation Energy

The Proposed Project would result in the consumption of transportation energy during operations from the use of motor vehicles. Because the efficiency of the motor vehicles in use with the Proposed Project is unknown—such as the average miles per gallon—estimates of transportation energy use are based on the overall vehicle miles traveled (VMT) and related transportation energy use. The VMT related to the Proposed Project would primarily come from future residents. Based on CalEEMod version 2016.3.2 and EMFAC2017 version 1.0.2, it is estimates that the VMT for the Proposed Project would be 5,465,383 miles per year. However, the Proposed Project would involve the construction of a residential community that would provide more housing opportunities less than one quarter mile from bus stops along Anaheim Boulevard and La Palma Avenue, with 15 minutes or less peak hour headways for buses, consistent with SCAG's criteria for a High Quality Transit Corridor. Furthermore, because the Project Site is in an urbanized area with nearby amenities and employment opportunities, it would contribute to reducing the VMT between residential and service needs. These features and aspects of the Proposed Project would contribute to minimizing VMT and transportation-related fuel usage. Thus, operation-related fuel usage associated with the Proposed Project would not be any more inefficient, wasteful, or unnecessary than similar development projects. Therefore, impacts would be less than significant with respect to operation-related fuel usage.

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

Less Than Significant Impact. A significant impact would occur if the Proposed Project conflicted with or obstructed a state or local plan for renewable energy or energy efficiency.

Local

The City's Green Element outlines goals and policies conserve energy during the construction and operation of buildings. Key goals and policies from the Green Element regarding new construction are:

- **Goal 15.2:** Continue to encourage site design practices that reduce and conserve energy.
  - **Policy 15.2(1):** Encourage increased use of passive and active solar design in existing and new development (e.g., orienting buildings to maximize exposure to cooling effects of prevailing winds and locating landscaping and landscape structures to shade buildings).
- **Goal 17.1:** Encourage building and site design standards that reduce energy costs.
  - **Policy 17.1(1):** Encourage designs that incorporate solar and wind exposure features such as daylighting design, natural ventilation, space planning and thermal massing.

The Proposed Project would support the City's goals by complying with Title 24 energy and efficiency standards and green building standards as amended by the AMC Section 15.03. Additionally, the City would review building plans and construction plans prior to the approval of the Proposed Project. This review would further ensure that the Proposed Project would comply with local and state regulations.

State

The Proposed Project would be constructed in accordance with the 2019 California Building Energy and Efficiency Standards (Title 24, Part 6) and CALGreen (Title 24, Part 11) as amended by AMC Chapter 15.03. The State updates Title 24 Parts 6 and 11 every three years to reduce wasteful and unnecessary energy consumption.

The Proposed Project would not conflict with or obstruct local or state plans regarding renewable energy or energy efficiency. Additionally, the City would review building plans and construction plans prior to the approval of the Proposed Project. This review would further ensure that the Proposed Project would comply with local and state regulations. Therefore, a less than significant impact would occur.

3.7 GEOLOGY AND SOILS

The following technical reports are the basis for this section:

- *Geotechnical Exploration Proposed Multi-Family Residential Development Project, 1122 N. Anaheim Boulevard, City of Anaheim, California* (Geotechnical Exploration), Leighton and Associates, Inc., September 24, 2019. (Appendix C)

- *Paleontological Records Search for the proposed The Invitation Project, in the City of Anaheim, Orange County*, Natural History Museum of Los Angeles County, March 10, 2020. (Appendix D)

Would the project:

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

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

Less Than Significant Impact. Based on a review of the Alquist-Priolo Earthquake map and the Seismic Hazard Zone maps of the Project Site and general vicinity, the Project Site is not in a currently established Alquist-Priolo Earthquake Fault Zone for fault rupture hazard. Therefore, the potential for surface fault rupture at the Project Site is low, and a surface fault rupture hazard evaluation is not mandated for the Project Site. The closest known active faults to the Project Site are the Puente Hills fault, approximately 1.5 miles to the northwest; Whittier-Elsinore Fault Zone, approximately 6.5 miles to the north; San Joaquin Hills fault, approximately 10.6 miles to the southwest; and the Newport-Inglewood Fault Zone, approximately 12.0 miles to the southwest. The Puente Hills and San Joaquin Hills faults are blind thrust faults that are concealed at depth, without the potential for surface fault rupture. The San Andreas fault, which is the largest active fault in California, is approximately 38 miles northeast of the Project Site. Therefore, a less than significant impact would occur. No mitigation measures are required.

ii) Strong seismic ground shaking?

Less Than Significant Impact. As discussed above, the Project Site is not in an established Alquist-Priolo Earthquake Fault Zone. However, like all areas in southern California, movement associated with the active faults could cause strong ground motion at the Project Site. The degree of ground shaking and earthquake-induced damage is dependent on multiple factors, such as distances to causative faults, earthquake magnitudes, and expected ground accelerations.

The Geotechnical Exploration indicated that the Proposed Project would experience strong ground shaking during an earthquake along one or more of the major active faults. However, the Proposed Project would be required to comply with the most updated seismic design parameters of the California Building Code (CBC), which would ensure that buildings on-site would be able to withstand ground shaking. The 2019 edition of CBC is the current edition, effective as of January 1, 2020. Therefore, a less than significant impact would occur.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a seismic phenomenon in which loose, saturated, fine-grained granular soils behave like a fluid when subjected to high-intensity ground shaking. Liquefaction

requires three general conditions: 1) shallow groundwater; 2) low density, fine, clean sandy soils; and 3) high-intensity ground motion. The Geotechnical Exploration stated that saturated, loose and medium dense, near-surface cohesionless soils exhibit the highest liquefaction potential, while dry, dense, cohesionless soils and cohesive soils exhibit low to negligible liquefaction potential. In general, liquefaction hazards are the most severe in the upper 50 feet below the ground surface (bgs). According to the State of California Seismic Hazard Zones map for the Anaheim Quadrangle, the Project Site is not in an area that has been identified as potentially susceptible to liquefaction, and the historically shallowest groundwater depth in the vicinity of the Project Site is greater than 50 feet bgs (Leighton 2019). The nearest location exhibiting a high groundwater table and potential for liquefaction is approximately one-mile north of the Project Site. Therefore, based on the three general conditions for potential liquefaction impact, the potential for liquefaction at the Project Site is low, and impacts would not be significant.

iv) Landslides?

No Impact. The Project Site and its surrounding area are absent of slopes, and therefore, the potential for seismically induced landslides is considered low. In addition, based on review of the State of California Seismic Hazard Zones Map for the Anaheim Quadrangle, the Project Site is not in an area identified as potentially susceptible to seismically induced landslides. The Proposed Project would not include any sloped areas exceeding a gradient of 2:1 (horizontal to vertical), and no landslide impact is anticipated.

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

Less Than Significant Impact. Soil erosion increases substantially during earth-moving activities unless erosion control measures are used. The following is a discussion of the potential erosion impacts resulting from the Proposed Project's construction and operational phases.

Construction Phase

The construction phase of the Proposed Project could result in soil erosion. Construction of the Proposed Project involves earthwork, such as grading and excavating, and construction equipment and vehicle use that could track soil off-site. Additionally, natural processes such as wind and rain could further lead to soil erosion during the construction phase. However, construction of the Proposed Project must comply with local and state codes regulating construction activities and soil erosion. Locally, the Proposed Project must comply with AMC Chapter 17.04, Grading, Excavations, Fills, Watercourses, which is in place to ensure that excavation and fills that may affect drainage and watercourses, are in accordance with good engineering practice. The Proposed Project is also required to comply with AMC Section 10.09, National Pollution Discharge Elimination System (NPDES), which requires that new development develop a water quality management plan (WQMP).

Concerning state regulations, the Proposed Project is required to obtain a Construction General Permit (CGP) issued by the State Water Resources Control Board. The CGP is in place to minimize water pollution from construction activities, including erosion. Construction activities at the Project Site are subject to NPDES permitting regulations, including the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP), discussed in detail in Section 3.10, *Hydrology and Water Quality*. As an MS4 operator, Orange County must obtain and implement NPDES permits for both the Santa Ana (SAR) and San Diego (SDR)

Regional Water Quality Control Board regions. As the Principal Permittee on both SAR and SDR NPDES Permits, the County guides development and implementation of the Program, collaborating regularly with Co-permittees to ensure compliance and prevent ocean pollution. The County of Orange requires the Proposed Project's construction contractor to prepare and implement a SWPPP and associated best management practices (BMPs) in compliance with the CGP during grading and construction. Adherence with existing state and local laws regulating construction activities would minimize soil erosion from project-related construction activities. Therefore, soil erosion impacts due to project construction would be less than significant.

Operation Phase

When the construction is completed, the Project Site would not contain exposed or bare soil with the potential for erosion or loss of topsoil. The Preliminary WQMP (included as Appendix H to the Initial Study) outlines operational BMPs to minimize any potential water quality. Additionally, the County of Orange would require the Proposed Project to implement BMPs in the WQMP. Therefore, the potential for soil erosion would be extremely low, and potential impacts would be less than significant.

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

Less Than Significant Impact With Mitigation Incorporated. The Proposed Project's geologic engineer performed subsurface explorations and found that the Project Site is underlain by a thin layer of undocumented artificial fill materials (Afu), overlying Quaternary-aged young alluvial fan deposits (Qyf). The artificial fill is generally about 1 to 2½ feet in thickness, and the existing artificial fill materials are likely associated with the existing improvements and initial development of the Project Site. However, records documenting observation and testing during fill placement were not available for review. Therefore, the geological analysis considered all fill material undocumented and unsuitable in its current configuration for structural support of the Proposed Project.

Underlying the artificial fill material are Quaternary-aged young alluvial fan deposits. The alluvium generally consists of a mixture of thick sequences of sand and silty sand to a depth of approximately 15 to 25 feet bgs, and to the maximum depth explored at 51.5 feet bgs. A zone of interbedded clay, silt, and silty clay of variable thicknesses exists between approximately 20 to 35 feet bgs and again between approximately 40 to 45 feet bgs.

The logs included in Appendix B of the Geotechnical Exploration (contained in Appendix C to this IS/MND) presents the stratigraphy of the subsurface soils as interpreted in each boring and CPT. Figure 2, Exploration Location Map, of the Geotechnical Exploration shows the locations of the explorations.

Liquefaction and Landslides

As discussed in Sections 3.7(a)iii and 3.7(a)iv, the Project Site is not in a seismic hazard zone for liquefaction or landslide. Therefore, impacts would not be significant.

3. Environmental Analysis

Lateral Spreading

Lateral spreading is a type of liquefaction-induced ground failure where lateral displacement of surficial blocks of sediment results from liquefaction in a subsurface layer. Once liquefaction transforms the subsurface layer into a fluid mass, gravity plus the earthquake inertial forces can cause the mass to move downslope toward a free face (such as a river channel or an embankment). Due to the very low potential for liquefaction, the potential for lateral spreading is also very low. Impacts would be less than significant.

Subsidence and Collapse

The phenomenon of widespread land sinking, or subsidence, is generally due to substantial overdraft of groundwater or underground petroleum reserves. Collapsible soils may appear strong and stable in their natural (dry) state, but they rapidly consolidate under wetting, generating large and often unexpected settlements. Seismically induced settlement consists of dynamic settlement of unsaturated soil (above groundwater) and liquefaction-induced settlement (below groundwater). These settlements occur primarily in low-density sandy soil due to the reduction in volume during and shortly after an earthquake.

The Geotechnical Exploration estimated that seismically induced settlement at the Project Site due to dry dynamic settlement (above groundwater) would be about ½ inch across the site. However, as outlined in the Geotechnical Exploration and required by Mitigation Measure GEO-1, the Project Applicant would be required to remove all existing undocumented fill and any soil deemed unsuitable by the geotechnical engineer to expose suitable native soils and replace with engineered fill below the proposed buildings and other structural improvements to provide uniform foundation support.

If the Project Applicant conducts all earthwork activities in accordance with the recommendations in the Geotechnical Exploration, impacts related to subsidence and collapsible soils would be less than significant. As such, Mitigation Measure GEO-1 ensures that the Project Applicant will implement the recommendations in the Geotechnical Exploration.

Mitigation Measure

GEO-1 Prior to issuance of demolition, grading and building permits, the Project Applicant shall demonstrate on plans submitted to the Public Works Department, to the satisfaction of the City Engineer, that during site preparation, grading, and construction the Proposed Project will demonstrate that all or equivalent recommendations have been incorporated into the Proposed Project's plans from the "Geotechnical Exploration, Proposed Multi-Family Residential Development Project, 1122 N. Anaheim Boulevard, City of Anaheim, California," prepared by Leighton and Associates, Inc. (September 24, 2019), or any updates to that report. Compliance with the approved Geotechnical Exploration shall be verified in the field by the Engineer of Record.

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

Less Than Significant Impact With Mitigation Incorporated. Expansive soils contain significant amounts of clay particles that swell considerably when wetted and shrink when dried. Foundations constructed on these soils are subject to uplifting forces caused by the swelling. The Geotechnical Exploration found that the near surface (upper five feet) soils on-site consist predominantly of sand, silty sand, sandy silt, silty clay, and clay, with the very low expansion index test values of 0 and 2. Although variance in expansion potential of on-site soil could occur, the Geotechnical Exploration found that standard engineering and earthwork construction practices, such as proper foundation design and controlled moisture conditioning, would be sufficient to reduce impacts associated with expansive soils. The Project Applicant would comply with the earthwork recommendations in the Geotechnical Exploration, and perform additional testing, as recommended, upon completion of rough grading to confirm the expansion potential result in the Geotechnical Exploration. With implementation of Mitigation Measure GEO-1, impacts from expansive soils would be less than significant.

Mitigation Measure

See Mitigation Measure GEO-1.

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

No Impact. The Proposed Project would not use septic tanks or alternative wastewater disposal systems. The Project Site is in an urbanized area of Anaheim, and the Proposed Project would connect to the City's wastewater system. No impact would occur.

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

Less Than Significant Impact. The Natural History Museum of Los Angeles County provided a paleontological records search letter dated March 10, 2020. This records search letter is in Appendix D to the Initial Study. The records search found no vertebrate fossil localities within the Project Site boundaries; however, there are fossil localities nearby in the same sedimentary deposits that may occur in the Project Site area, either at the surface or at depth.

The records search indicated that surface sediments throughout the Project Site and the surrounding area consist of younger terrestrial Quaternary Alluvium, derived primarily as alluvial fan deposits from the hills of the Santa Ana Mountains. These younger Quaternary deposits typically do not contain significant vertebrate fossils, at least in the uppermost layers. However, older Quaternary deposits, at varying depths, which could contain significant vertebrate fossils, underlie the surface sediments. The records search identified a vertebrate fossil locality (LACM 1652) that produced a fossil specimen of sheep, *Ovis*, southeast of the Project Site near Rio Vista Avenue south of Lincoln Avenue, just west of the Santa Ana River. The closest fossil locality in older Quaternary sediments is LACM 4943, which produced a specimen of fossil horse, *Equus*, at a depth of 8 to 10 feet below the surface, situated southeast of the Project Site along Fletcher Avenue, east of Glassell Street, east of the Santa Ana River.

The records search letter indicated that shallow excavations in the uppermost few feet of the younger Quaternary alluvial sediments are unlikely to uncover significant fossil vertebrate remains, but deeper excavations that extend into older Quaternary sediments could result in potential impacts to vertebrate fossils. The Geotechnical Exploration found that the Project Site is underlain by a thin layer of undocumented artificial fill materials (Afu) (approximately 1 to 2.5 feet in thickness), overlying Quaternary-aged young alluvial fan deposits (Qyf). The Geotechnical Exploration generally identified Quaternary-aged young alluvial fan deposits at approximately 15 to 25 feet bgs across the Project Site and at the maximum depth explored at 51.5 feet bgs.

The geotechnical report for the Proposed Project indicated that removals and over-excavations would occur at approximately 3 feet to 5 feet below existing grade across the site. Although a representative of the geotechnical engineer may require deeper over-excavations in localized areas—depending on observed subsurface conditions—the potential for encountering older Quaternary deposits that may contain significant fossil vertebrate would be low considering the depth of the Quaternary-aged young alluvial fan deposits encountered on-site, and impacts would not be significant. In the unlikely event that construction activities encounter paleontological resources, the Proposed Project would be required to comply with California Public Resources Code (PRC), Chapter 1.7, Sections 5097.5. PRC Section 5097.5 prohibits persons from knowingly and willfully excavating upon, or removing, destroying, injuring, or defacing any vertebrate paleontological site, including fossilized footprints or other paleontological features. Therefore, a less than significant impact would occur, and no mitigation measures are required.

3.8 GREENHOUSE GAS EMISSIONS

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

This section analyzes the Proposed Project's contribution to global climate change impacts in California through an analysis of Proposed Project-related GHG emissions. Information on manufacture of cement, steel, and other "life cycle" emissions that would occur because of the project are not applicable and are not included in the analysis. Black carbon emissions are not included in the GHG analysis because CARB does not include this pollutant in the state's AB 32 inventory and treats this short-lived climate pollutant separately (CARB 2017a). Appendix A to this Initial Study provides a background discussion on the GHG regulatory setting and the GHG modeling for this project.

Would the project:

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

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

Table 6, *Project-Related Operation GHG Emissions,* shows the construction and operation-phase GHG emissions for the existing operations on the Project Site and the Proposed Project. Pursuant to CEQA Guidelines Section 15063(d)(2), the existing uses are part of the existing environmental setting and sets the baseline for current GHG environmental conditions. A shown in the table, the net difference between the existing conditions and the Proposed Project is compared. The Proposed Project would generate GHG emissions from vehicle trips generated by the project (e.g., residents) energy use (indirectly from purchased electricity use and directly through fuel consumed for building heating), area sources (e.g., landscaping equipment used on-site, consumer products, and coatings), water/wastewater generation, and waste disposal. The analysis amortized annual average construction emissions over 30 years and included in the emissions inventory the one-time GHG emissions from the construction phase of the project. Overall, development and operation of the Proposed Project would not generate net annual emissions that exceed the South Coast AQMD bright-line threshold of 3,000 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year (South Coast AQMD 2010). Therefore, the Proposed Project's cumulative contribution to GHG emissions would be less than significant.

Table 6 Project-Related Operation GHG Emissions

Source	GHG (MTCO2e/Year)		
	Existing	Project	Net
Area	<1	5	5
Energy	42	1,145	1,103
Mobile (Vehicle Trips)	429	1,555	1,128
Solid Waste	8	62	54
Water	26	263	237
Amortized Construction Emissions[1]	NA	75	75
Total	505	3,105	2,601
South Coast AQMD Bright-Line Threshold	NA	NA	3,000 $MTCO_2e$/Yr
Exceeds Bright-Line Threshold?	NA	NA	No

Source: CalEEMod, Version 2016.3.2.25. Totals may not equal to the sum of the values as shown due to rounding
Notes: MTons: metric tons; $MTCO_2e$: metric ton of carbon dioxide equivalent
[1] Total construction emission are amortized over 30 years per South Coast AQMD methodology.

3. Environmental Analysis

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

No Impact. The California Air Resources Board's (CARB) Scoping Plan and SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) are the applicable plans adopted for reducing GHG emissions. Below is a consistency analysis between the Proposed Project and these plans.

CARB Scoping Plan

CARB's Scoping Plan is California's GHG reduction strategy to achieve the state's GHG emissions reduction target established by Assembly Bill (AB) 32, which is to return to 1990 emission levels by year 2020. The CARB Scoping Plan is applicable to state agencies and is not directly applicable to cities/counties and individual projects. Nonetheless, the Scoping Plan has been the primary tool used to develop performance-based and efficiency-based CEQA criteria and GHG reduction targets for climate action planning efforts.

Since adoption of the 2008 Scoping Plan, state agencies have adopted programs identified in the plan, and the legislature has passed additional legislation to achieve the GHG reduction targets. Statewide strategies to reduce GHG emissions include the Low Carbon Fuel Standard, California Appliance Energy Efficiency regulations, California Renewable Energy Portfolio standard, changes in the Corporate Average Fuel Economy standards, and other early action measures as necessary to ensure the state is on target to achieve the GHG emissions reduction goals of AB 32. In addition, new buildings are required to comply with the latest applicable Building Energy Efficiency Standards and CALGreen. On December 24, 2017, CARB adopted the Final 2017 Climate Change Scoping Plan Update to address the new 2030 interim target to achieve a 40 percent reduction below 1990 levels by 2030, established by Senate Bill (SB) 32 (CARB 2017c). Although measures in the Scoping Plan apply to state agencies and not the Proposed Project, the Proposed Project would reduce its GHG emissions through compliance with statewide measures adopted since AB 32 and SB 32. Therefore, the Proposed Project would not obstruct implementation of the CARB Scoping Plan, and impacts would be less than significant.

SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

SCAG's Regional Council adopted the Connect SoCal Plan (the 2020-2045 RTP/SCS) on May 7, 2020 (SCAG 2020a) for federal transportation conformity purposes only. In light of the COVID-19 pandemic, the Regional Council will consider approval of Connect SoCal in its entirety and for all other purposes within 120 days from May 7, 2020. The Connect SoCal Plan's core vision centers on maintaining and managing the transportation network for moving people and goods while expanding mobility options by locating housing, jobs and transit closer together.. The Connect SoCal Plan identifies 10 goals and 7 guiding principles that guide the plan. The 10 goals fall into four categories (economy, mobility, environment, and healthy/complete communities). The 10 goals identified in the SoCal Connect Plan include:

- Encourage regional economic prosperity and global competitiveness;
- Improve mobility, accessibility, reliability, and travel safety for people and goods;
- Enhance the preservation, security, and resilience of the regional transportation system;

- Increase person and goods movement and travel choices within the transportation system;
- Reduce greenhouse gas emissions and improve air quality;
- Support healthy and equitable communities;
- Adapt to a changing climate and support an integrated regional development pattern and transportation network;
- Leverage new transportation technologies and data-driven solutions that result in more efficient travel;
- Encourage development of diverse housing types in areas that are supported by multiple transportation options; and
- Promote conservation of natural and agricultural lands and restoration of habitats (SCAG 2020b).

The Connect SoCal Plan contains transportation projects to help more efficiently distribute population, housing, and employment growth, as well as forecasted development that is generally consistent with regional-level general plan data so as to promote active transport and reduce GHG emissions. The projected regional development, when integrated with the proposed regional transportation network identified in the Connect SoCal Plan, would reduce per capita vehicular travel-related GHG emissions and achieve the GHG reduction per capita targets for the SCAG region.

Bus routes serving the Project area within ¼-mile of the Project's location include OCTA route 38 and 47. These routes provide connections to several areas countywide. In addition, the project site is approximately 1.25 miles from the Fullerton Station, which regional trains including Amtrak and Metrolink serve.

The Project is within a transit priority area as defined by Public Resources Code (PRC) Section 21099(a)(7). A transit priority area is an area within one-half mile of an existing major transit stop (or planned under certain conditions).

The SCS does not require that local general plans, specific plans, or zoning be consistent with the SCS, but provides incentives for consistency to governments and developers. The Proposed Project is an infill development project that would provide new residential housing on the Project Site, which would contribute to reducing the vehicle miles traveled between residential and service needs. Therefore, the Proposed Project would not interfere with SCAG's ability to implement the regional strategies outlined in the RTP/SCS, and no impact would occur.

3.9 HAZARDS AND HAZARDOUS MATERIALS

The basis for the analysis in this section is in part on the following technical study:

- *Phase I Environmental Site Assessment of Anaheim Fullerton Towing 1122 North Anaheim Boulevard, Anaheim, California*, AECOM, December 17, 2017. (Appendix E)

3. Environmental Analysis

- *Phase II Environmental Site Assessment, 1122 North Anaheim Boulevard, Anaheim, California,* Leighton and Associates, Inc., March 6, 2019. (Appendix F)

Would the project:

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

Less Than Significant Impact. The Project Site is currently operating as an automobile tow yard by Anaheim Fullerton Towing. The Property Owner leases a portion of the Project Site to Ecosystem Trucking. Uses of the Project Site include the storage, maintenance and repair of company vehicles as well as the storage of vehicles impounded by various city and police departments. Ecosystem Trucking uses the Project Site to store/park its company vehicles. Existing physical improvements on the Project Site include a small office building, an automobile and freight truck shop, an employee break-room building, an automobile storage warehouse, an asphalt-paved parking lot for impounded automobiles, an unpaved freight truck parking lot, and a materials storage yard (e.g., shipping containers, truck trailer storage). The Project Site has been an automobile and freight truck storage/tow yard, maintenance and repair facility, and fueling site since at least 1947.

Project construction would require small amounts of hazardous materials, including fuels, greases, other lubricants, and coatings such as paint. The handling, use, transport, and disposal of hazardous materials by the construction phase of the project would comply with existing regulations of several agencies—the Environmental Protection Agency (EPA), Orange County Environmental Health Division, California Division of Occupational Safety and Health, US Occupational Safety and Health Administration, and US Department of Transportation.

Construction projects typically maintain supplies on-site for containing and cleaning small spills of hazardous materials. However, construction activities would not involve a significant amount of hazardous materials, and their use would be temporary. Furthermore, under the Occupational Safety and Health Act of 1970, employers are responsible for providing a safe and healthful workplace. Pursuant to the Title 29 Code of Federal Regulations, Part 1910.1200, the Project Applicant would ensure training for project construction workers on the proper use, storage, and disposal of hazardous materials. This standard states "[e]mployers shall provide employees with effective information and training on hazardous chemicals in their work area at the time of their initial assignment.... Information and training may be designed to cover categories of hazards (e.g., flammability, carcinogenicity) or specific chemicals." All on-site activities during construction and operation would be required to adhere to federal, state, and local regulations for the management and disposal of hazardous materials. Therefore, the Project Applicant would properly manage the transport, use, and/or disposal of hazardous materials during construction of the Proposed Project, and impacts would be less than significant.

The Proposed Project is a residential development. Occupants would use cleaners, solvents, paints, and other household maintenance products in relatively small quantities. In small quantities, these household items are not typically hazardous materials that could result in a significant hazard to the public or the environment. With the exercise of normal safety practices, the Proposed Project would not create substantial hazards to the public or the environment. Therefore, a less than significant impact would occur. No mitigation measures are required.

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

Less Than Significant Impact with Mitigation Incorporated. A Phase I Environmental Site Assessment (ESA) (Phase I) and Limited Phase II Assessment (Phase II) were prepared for the Project Site. The objective of a Phase I is to assess whether recognized environmental conditions (REC), historical RECs, or controlled RECs are associated with the Project Site, as defined in the American Society for Testing and Materials (ASTM) Standard. The objective of a Phase II is to address any RECs identified in the Phase I.

ASTM defines a REC as "the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment." The term includes hazardous substances or petroleum products even under conditions in compliance with laws. Historical RECs are a past release of any hazardous substances or petroleum products that has occurred in connection with the property and addressed to the satisfaction of the applicable regulatory authority or meets unrestricted use criteria established by a regulatory authority without subjecting the property to any required controls. Controlled RECs are a recognized environmental condition resulting from a past release of hazardous substances or petroleum products, addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls. De minimis conditions are situations that do not present a material risk of harm to public health or the environment.

Phase I ESA

Recognized Environmental Conditions

- The Phase I identified the long-term (over 80 years) historical use of the Project Site for automotive storage and repair as a REC.

- The Project Site formerly contained five underground storage tanks (USTs). Four USTs (i.e., a 2,000-gallon diesel UST, 10,000-gallon diesel UST, and two 500-gallon waste oil USTs) were removed and a 20,000-gallon diesel UST at the south side of the truck freight shop was abandoned in place. Abandonment of the 20,000-gallon diesel UST occurred by triple-rinsing and filling the UST with a slurry mix recommended by Anaheim Fire and Rescue. Soil testing conducted during tank removal operations in April 1999 documented elevated concentrations of diesel under the former fuel dispenser island in the truck freight shop. Two soil samples showed elevated concentrations of TPH-D at 13,200 parts per million (ppm) and 1,850 ppm. Additional soil sampling was conducted in November 1999, and, based on the lack of soil contamination from analytical laboratory testing, the Regional Water Quality Control Board (RWQCB) issued a regulatory site closure and a no further action letter in 2000 with a condition that if site uses change, additional site characterizations and mitigation may be required. Although RWQCB issued a regulatory site closure for the former USTs, the previous investigation did not include vapor intrusion pathway evaluation, and soil impacted by residual petroleum hydrocarbon may remain in place and present vapor encroachment conditions at the Project Site. Therefore, the Phase I identified the former USTs as a REC.

3. Environmental Analysis

- The Phase I identified one suspected oil-water separator adjacent to the north of the truck freight shop (see Figure 3, *Existing Site Conditions*) in an area used for automobile and truck washing. The Phase I did not provide information that described where the suspected oil-water separator discharges, if anywhere. Due to the historical use of the Project Site as an automobile and freight truck storage/tow lot and maintenance and fueling facility, the potential oil-water separator is a REC in connection with the Project Site.

- Numerous hazardous materials sites (over 150 sites) were identified within their respective ASTM and/or Environmental Data Resources, Inc. (EDR) search distances from the Project Site, including five that are in proximity to the Project Site: 1) Electra Gear Regal Division, 1110 North Lemon Street; 2) Sunwest Metals, 1150 North Anaheim Boulevard; 3) National Distil & Chem, 1045 North Kemp Street; 4) Milldrum Bros, 1020 North Lemon Street; and 5) Performance Printing, 1050 North Anaheim Boulevard.

  Of these sites, Electra Gear Regal Division at 1110 North Lemon Street is adjacent to the south of the Project Site and currently an active voluntary cleanup site. This off-site property was formerly an automobile parts manufacturer, and had multiple historical USTs on the site. Potential contaminants of concern include PCBs, TPH-motor oil, and tetrachloroethylene (PCE) in the soil. The Phase I determined that it is possible that PCE has migrated into the southwestern portion of the Project Site and considered the potential for PCE as a REC and a vapor encroachment condition.

- National Distil & Chem at 1045 N. Kemp Street, adjacent to the east of the Project Site, was historically U.S. Industrial Chemicals' Anaheim Plant from at least 1938 through 1977. This off-site property contains a boiler-and-evaporating building, a cooling tower, a dry-ice building, an industrial-alcohol plant, and three aboveground storage tanks. Although no contamination-related issues were identified in the EDR report, based on the likely use of hazardous materials as part of chemical production operations and the chemical plant's length of operation (at least 40 years), the Phase I identified this use as a REC.

Controlled RECs

The Phase I did not identify any controlled RECs.

Historical RECs

The Project Site is listed as a leaking UST site. In 1995, several diesel-fuel USTs and related fueling pumps were removed from the Project Site. In 2000, following the removal of petroleum-impacted soil, the RWQCB issued a regulatory site closure. The Phase I considered the former on-site leaking UST case to be a historical REC.

De Minimis Conditions

The Phase I identified more than five oil stains that were approximately nine square feet or smaller on the concrete and asphalt throughout the Project Site. However, the Phase I considered these stains de minimis conditions.

The Phase I recommended a limited Phase II ESA to evaluate how the RECs affected the Project Site.

Phase II ESA

Leighton and Associates, Inc. prepared a Phase II ESA, on March 6, 2019, to determine what, if any, environmental impacts are present in the subsurface soil and soil gas from historical industrial uses on the site as well as potential off-site sources. The Phase II included collection of nine initial exploratory soil borings (SB1 through SB9) to total depths between 15 and 35 feet bgs and 14 step-out borings in the vicinity of initial borings SB6 and SB9 to total depths of 10 feet bgs. The Phase II also conducted soil gas probes in initial borings SB1 through SB6 and SB9 to collect soil gas samples. Figure 14, *Soil Boring Locations,* shows the soil boring locations.

Soil Analysis Results

The Phase II ESA compared the soil analysis results to one or more of the following regulatory screening criteria:

- The EPA Region IX Residential Regional Screening Levels (RSLs, November 2018).
- The DTSC Southern California Background concentration of 12 mg/kg for arsenic.
- The DTSC Office of Human and Ecological Risk (HERO) Note Number 3 (June 2018).

The Phase II found that soil in the vicinity of two borings, SB6 and SB9, contains gasoline range organics (GRO) or diesel range organics (DRO) and oil range organics (ORO) at concentrations exceeding the RSL for residential land use. Concentrations of VOCs and metals do not exceed residential use screening criteria.

- **Total Petroleum Hydrocarbons (TPH).** The Phase II ESA detected TPH as gasoline, or GRO, in 4 of the 37 soil samples, and the detected concentration of GRO in sample SB9-5 exceeded the residential RSL of 86 mg/kg.

  However, although the Phase II ESA detected GRO at 260 mg/kg in boring SB9 at a depth of 5 feet bgs, it did not exceed the laboratory-reporting limit in the samples collected above or below, at 2.5 feet bgs or 10 feet bgs in boring SB9. Soil samples collected at depths of 2.5, 5, and 7.5 feet bgs from step-out soil borings approximately 2.5 feet north and south of SB9 and 5 feet east and west of SB9 did not contain GRO at concentrations exceeding the regulatory screening limits. Therefore, the Phase II ESA concluded that based on the results of the step-out soil samples, the GRO-impacted soil identified in boring SB9 is very limited in vertical and lateral extent and is considered de minimis.

  The Phase II ESA detected TPH as diesel, or DRO, in 19 of the 39 soil samples. The detected concentrations of DRO in three soil samples, SB6-2.5, SB6-E5-2.5, and SB6-5, exceeded the residential RSL of 96 mg/kg. The Phase II ESA detected TPH as motor oil, ORO, in 38 of the 39 soil samples. The detected concentrations of ORO in two soil samples (SB6-2.5 and SB6-5) exceeded the residential RSL of 2,500 mg/kg.

However, although the Phase II ESA detected DRO and ORO at maximum concentrations of 4,100 mg/kg and 1,800 mg/kg in boring SB6 at depths of 2.5 feet and 5 feet bgs, respectively, they were not detected at concentrations exceeding the RSL in the soil sample collected at a depth of 10 feet bgs.

Boring SB6 was adjacent to the oil/water separator on the north side of the truck freight shop, and a potential release associated with the oil/water separator could be the source of contamination. The Phase II ESA detected DRO at a concentration exceeding the residential RSL in one step-out soil boring, SB6-E5 (5 feet east of boring SB6), at a depth of 2.5 feet bgs. DRO was not detected above the laboratory reporting limits in step-out borings SB6-NE10 and SB6-SE10, which were approximately 10 feet southeast and northeast, respectively, of boring SB6. The extent of DRO-impacted soil is limited to an area approximately 10 feet by 15 feet and ranges in vertical depth from 5 feet in the vicinity of boring SB6-E5 to 7.5 feet in the vicinity of boring SB6.

Therefore, the area of soil requiring removal and off-site disposal is approximately 10 feet by 15 feet up to an average depth of 6.5 feet. The estimated quantity is approximately 36 CY or roughly 58 tons. The Phase II ESA determined that with removal of the TPH-impacted soil, no further investigation is necessary. Figure 14, *Soil Boring Locations*, illustrates the area requiring removal. The Project Applicant is required to perform soil removal, and with removal of the TPH-impacted soils as mitigation, hazardous materials impacts would be less than significant.

- **Volatile Organic Compounds (VOC).** The Phase II ESA detected three VOCs in soil samples. 1,2,4-Trimethylbenzene was in 1 of the 12 soil samples. The amount detected did not exceed the residential screening criteria of 300,000 µg/kg. 1,3,5-Trimethylbenzene was in 1 of the 12 soil samples. The amount detected did not exceed the residential screening criteria of 270,000 µg/kg. Methylene chloride was in 1 of the 12 soil samples. The amount detected did not exceed the residential screening criteria of 1,800 µg/kg.

- **Title 22 Metals.** The Phase II ESA detected Title 22 metals in each of the soil samples analyzed during this investigation, with the exception of antimony, selenium, silver, and thallium. However, no samples contained metals at concentrations exceeding their respective screening criteria.

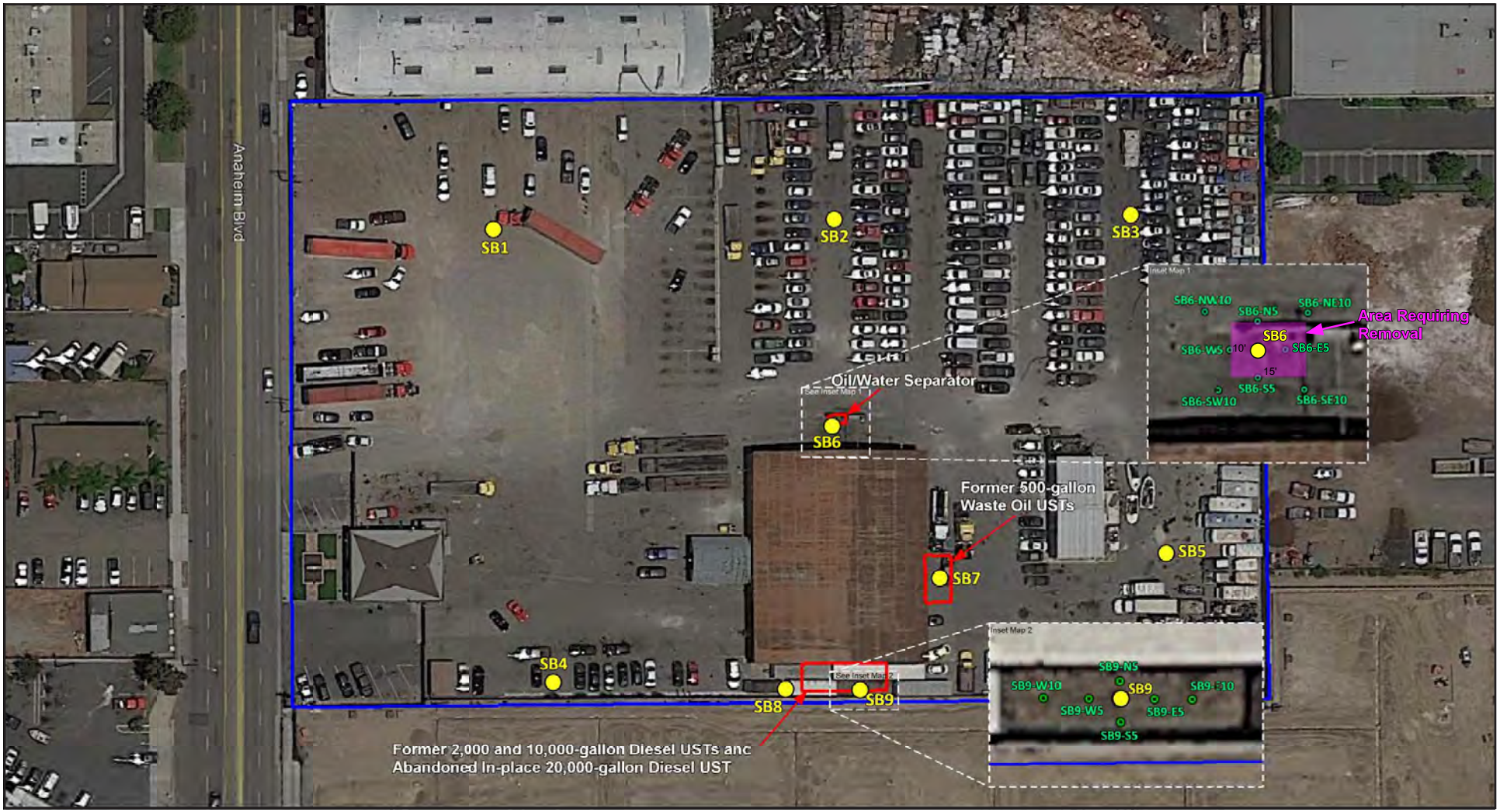
Soil Gas Analysis Results

The soil gas analysis results were compared to the criteria below. The selected decision criteria are conservative values typically used for screening purposes on residential properties and are not regulatory cleanup goals for the Project Site.

- Adjusted HERO Note 3 (June 2018).

- EPA Region 9 RSLs (November 2018) for indoor air in the more conservative residential setting assuming a future slab attenuation factor of 0.001.

Figure 14 - Soil Boring Locations



Project Boundary

Approximate Initial Boring Location and ID

Approximate Step-out Boring Location and ID

0 100

Scale (Feet)

Source: Leighton, 2019

3. Environmental Analysis

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As described below, concentrations of VOCs detected in soil gas samples did not exceed the above residential use screening criteria, and therefore, impacts would be less than significant.

- **PCE.** PCE was in 12 of the 16 soil gas samples, but did not exceed the residential screening criteria of 0.46 µg/L.
- **Benzene.** Benzene was in 1 of the 16 soil gas samples, but did not exceed the residential screening criteria of 0.097 µg/L.
- **n-Propylbenzene.** n-Propylbenzene was in 1 of the 16 soil gas samples, but did not exceed the residential screening criteria of 1,000 µg/L.
- **n-Butylbenzene.** n-Butylbenzene was in 1 of the 16 soil gas samples, but there is no applicable screening criteria for n-Butylbenzene.
- **sec-Butylbenzene.** sec-Butylbenzene was in 1 of the 16 soil gas samples, but there is no applicable screening criteria for sec-Butylbenzene.

The Phase II ESA found that no impacted soils exceeding the residential screening criteria were detected at boring location SB9, where the abandoned in place 20,000-gallon UST is located at the south side of the truckfreight shop. However, of the Anaheim Fire and Rescue recommended that the Project Applicant remove and dispose of the 20,000-gallon UST under the guidance and direction of Anaheim Fire and Rescue's Hazardous Materials Section as part of the Proposed Project. Therefore, a mitigation measure is provided to remove the abandoned in-place 20,000-gallon diesel UST.

Mitigation Measure

HAZ-1 Any project-related hazardous materials and hazardous wastes will be transported to and/or from the Project Site in compliance with applicable state and federal requirements, including the US Department of Transportation regulations listed in the Code of Federal Regulations (Title 49, Hazardous Materials Transportation Act); California Department of Transportation standards; and the California Occupational Safety and Health Administration standards.

HAZ-2 Any project-related hazardous waste generation, transportation, treatment, storage, and disposal will be conducted in compliance with the Subtitle C of the Resource Conservation and Recovery Act (Code of Federal Regulations, Title 40, Part 263), including the management of nonhazardous solid wastes and underground tanks storing petroleum and other hazardous substances.

HAZ-3 Any project-related underground storage tank (UST) removals will be conducted in accordance with the California UST Regulations (Title 23, Chapter 16 of the California Code of Regulations). Any unauthorized release of hazardous materials will require release reporting, initial abatement, and corrective actions that will be completed with oversight from the Regional Water Quality Control Board, Department of Toxic Substances Control,

Anaheim Fire and Rescue's Hazardous Materials Section, South Coast Air Quality Management District and/or other regulatory agencies, as necessary.

HAZ-4 Prior to the issuance of building permits, the Project Applicant shall remove the 20,000-gallon diesel underground storage tank (UST) and pipelines abandoned in-place on the south side of the truck freight shop under the oversight of the Anaheim Fire and Rescue (AFR). This work shall consist of the following:

- Obtain a UST removal permit from the AFR;
- Notify AFR to inspect and schedule an inspection;
- Remove soil from above the UST sufficiently to allow access to the tank top for verification of the tank contents (assumed to be concrete slurry);
- Excavate and stockpile soil surrounding the UST, collect soil samples for profiling (either for onsite reuse or offsite disposal);
- Remove the UST (may require cutting tank and slurry loading/disposal);
- Collect any required confirmation soil samples from beneath the UST for laboratory analysis as directed by the AFR inspector;
- Submit documentation of UST Removal to AFR for issuance of a UST Closure letter; and
- Compile soil sampling results for inclusion into a larger report documenting the condition of all onsite soil and requesting a closure from the Regional Water Quality Control Board.

HAZ-5 Prior to the issuance of building permits, the Project Applicant shall receive a No Further Action from the Regional Water Quality Control Board (RWQCB) by taking the following steps to remove the Total Petroleum Hydrocarbons (TPH)-impacted soil from two areas: 1) approximately 50 cubic yards of impacted soil with concentrations up to 13,120 milligram per kilogram (mg/kg) to a maximum depth of 10 feet below ground surface (bgs) in the vicinity of the former dispenser island in the truck freight shop, and 2) approximately 36 cubic yards of impacted soil with concentrations up to of 4,100 mg/kg at depths of 2.5 and 5 feet bgs in the vicinity of the oil/water separator on the north side of the truck freight shop:

- Prepare a Work Plan for the excavation and offsite disposal of soil with concentrations in excess of Residential Use Screening Levels promulgated and accepted by Cal EPA and the Regional Water Quality Control Board (RWQCB);
- Meet with RWQCB to present the Work Plan and to discuss site redevelopment plans and facilitate rapid review and approval of the Work Plan;
- Following RWQCB approval and start date notification, excavate impacted soil from both areas, either stockpiling or directly loading the removed soil for proper offsite disposal;

- Collect confirmation soil samples specified in the Work Plan for laboratory analysis; and.
- Compile all site soil sample results for inclusion in a Remedial Excavation Report documenting the condition of remaining onsite soil and request a No Further Action Letter from the RWQCB.

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

No Impact. There are no schools within one-quarter mile of the Project Site. The nearest school is Horace Mann Elementary School, approximately 0.32 mile southwest of the Project Site. The Proposed Project would not emit hazardous emissions within one-quarter mile of an existing of proposed school. No impact would occur.

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

Less Than Significant Impact. The Phase I found that the Project Site is in a number of contamination- and compliance-related regulatory databases (e.g., CA RGA LUST, CA HAZNET, FINDS, CA LUST, CA SWEEPS UST, CA FID UST, RCRA NonGen/NLR, and CA HIST CORTESE). Appendix E, *Phase I*, of the Initial Study contains the EDR results that identify individual database listings related to the Project Site. The contamination-related listings are associated with diesel-impacted soils from the historical USTs at the Project Site. However, this issue was investigated, and the Santa Ana RWQCB issued a regulatory case closure in 2000. Therefore, although the Project Site is on a list of hazardous materials sites, the Phase I determined that being on the list is not a REC. Therefore, implementation of the Proposed Project would not create a significant hazard to the public or the environment, and impacts would be less than significant. No mitigation measures are required.

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

No Impact. The nearest airport to the Project Site is Fullerton Municipal Airport, approximately 3.5 miles to the northwest (Airnav.com 2020). There are no public airports within two miles, and the Project Site is not part of the Airport Environs Land Use Plan for Fullerton Municipal Airport or any other airport. The Project Site is outside of the areas that the Airport Land Use Commission (ALUC) regulates land uses because of air crash hazards and the heights of structures to prevent airspace obstructions. The Proposed Project would not result in safety hazards related to aircraft operations. No impact would occur.

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

Less Than Significant Impact. The Proposed Project would not conflict with adopted emergency response or evacuation plans. The surrounding roadways would continue to provide emergency access to the Project Site

and surrounding properties during construction and post construction. The Proposed Project would not result in inadequate emergency access, and impacts to adopted emergency response and evacuation plans are less than significant. No mitigation measures are required.

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

No Impact. The Project Site is in a built-out portion of the City and is not in a fire hazard zone designated by the California Department of Forestry and Fire Protection (CAL FIRE 2011). No impacts would occur.

3.10 HYDROLOGY AND WATER QUALITY

The analysis in this section is based in part on the following technical studies:

- *Hydrology Analysis for The Invitation, 1122 N. Anaheim Boulevard, City of Anaheim, County of Orange*, Hunsaker & Associated Irvine, Inc., April 23, 2020. (Appendix G)
- *Preliminary Water Quality Management Plan, The Invitation Permit No. OTH2019-01205*, Hunsaker & Associates Irvine, Inc., April 23, 2020. (Appendix H)

Would the project:

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

Less Than Significant Impact. The existing runoff flows across the Project Site from the northeast to southwest toward Anaheim Boulevard, and any overflow discharges to the existing storm drain system in Anaheim Boulevard, which conveys the runoff flows approximately 0.10 mile south to the existing Orange County Flood Control District's facility, Carbon Creek Channel (B01). From the Carbon Creek Channel, flows continue westerly and combine with Coyote Creek (LACFDC, A01), then flow southerly to the San Gabriel River and ultimately discharge into the Pacific Ocean.

Construction Impact

As an MS4 operator, Orange County must obtain and implement NPDES permits for both the Santa Ana (SAR) and San Diego (SDR) Regional Water Quality Control Board regions. As the Principal Permittee on both SAR and SDR NPDES Permits, the County guides development and implementation of the Program, collaborating regularly with Co-permittees to ensure compliance and prevent ocean pollution.. The County of Orange would require the Proposed Project to obtain a NPDES Construction General Permit and prepare a SWPPP. **The** SWPPP includes BMPs to reduce water quality impacts, including various measures to control on-site erosion; reduce sediment flows into stormwater; reduce wind erosion; reduce tracking of soil and debris into adjacent roadways and off-site areas; and manage wastes, materials, wastewater, liquids, hazardous materials, stockpiles, equipment, and other site conditions to prevent pollutants from entering the storm drain system. Inspections, reporting, and stormwater sampling and analysis are also required to ensure that the construction of the Proposed Project would not discharge visible and non-visible pollutants off-site. Implementation of the

provisions of the NPDES permit and compliance with City grading requirements would minimize construction impacts through BMPs that reduce construction-related pollutants. This would ensure that any impacts to downstream waters resulting from construction activities would be less than significant.

Operational Impact

The Project Site is in the San Gabriel-Coyote Creek Watershed. There is no Watershed Infiltration and Hydromodification Management Plan for the San Gabriel-Coyote Creek Watershed. The Project Site's receiving waters are Carbon Canyon Creek, Coyote Creek, San Gabriel River, and Pacific Ocean. Table 7, *Receiving Water 303(d) Listed Impairments, Applicable TMDLs, and Pollutants of Concern*, describes listed pollutants under Clean Water Act (CWA) Section 303(d). CWA Section 303(d) would consider the receiving waters impaired. Table 7 lists the total maximum daily load (TMDL) established for Coyote Creek and the San Gabriel River estuary. There are no TMDLs for other water bodies. The Project Site is not in an environmentally sensitive or special biological significance area.

Table 7 Receiving Water 303(d) Listed Impairments, Applicable TMDLs, and Pollutants of Concern

Receiving Water Body	Listed Pollutants
Carbon Canyon Creek	None
Coyote Creek	Dissolved copper, indicator bacteria, pH, malathion, iron, toxicity
San Gabriel River Reach 1 (Estuary to Firestone)	pH, temperature
San Gabriel River Estuary	Copper, dioxin, nickel, oxygen, dissolved oxygen, indicator bacteria
San Pedro Bay Near/Off Shore Zones	Chlordane, DDT, PCBs, sediment toxicity
Receiving Water Body	Applicable TMDLs
Coyote Creek	Dissolved copper, indicator bacteria
San Gabriel River Estuary	Copper, Indicator Bacteria
Pollutants of Concern for the Project	
Pollutants of Concern	Suspended solids/sediment, nutrients, pathogens, pesticides, oil and grease, toxic organic compounds, trash and debris
Primary Pollutants of Concern	Nutrients, pathogens, and pesticides

Source: Hunsaker 2020b.

During operation, the Proposed Project would involve activities typical of day-to-day residential developments. In addition, the Proposed Project would generate typical residential household wastes. These include food wastes, paper products, and recyclable materials. These materials would be disposed of at on-site trash enclosures and removed for disposal by the local private waste management company. The preliminary WQMP identified pollutants of concern for the Proposed Project as suspended solids/sediment, nutrients, pathogens, pesticides, oil and grease, toxic organic compounds, and trash and debris; the primary pollutants of concern are nutrients, pathogens and pesticides (Table 7). In order to minimize operational water quality impacts and in compliance with the County's MS4 permit program, the Project Applicant designed the Proposed Project in accordance with the following low impact development (LID) and treatment performance criteria.

Low Impact Development and Treatment Control Performance Criteria

- **LID performance criteria.** Retain stormwater runoff on-site (e.g., infiltrate, harvest and use, or evapotranspire), as feasible, up to the design capture volume (DCV), and incorporate EPA guidance, "Managing Wet Weather with Green Infrastructure: Green Streets" in a manner consistent with the maximum extent practicable standard.

- **Treatment control BMP performance criteria.** Per the Ocean Plan Trash Amendments, a Full Capture System must trap particles 5 mm or greater and have a design treatment capacity that is equal to or greater than peak flow rate for the one-year, one-hour storm in the subdrainage area.

Design BMPs

In accordance with the County's LID and treatment control BMP criteria, the Proposed Project included the below site design BMPs to reduce land development impacts on water quality and downstream hydrologic conditions. Benefits of site design BMPs include reductions in the size of downstream BMPs, conveyance systems, pollutant loading, and hydromodification impacts.

- **Minimize Impervious Area.** The Project Applicant designed the Proposed Project to minimize impervious area by providing all multilevel structures and by incorporating landscaping in the open space areas, parkways, areas between residential buildings, and other suitable landscaping areas, thereby reducing runoff generated during rain.

- **Maximize Natural Infiltration Capacity.** The Proposed Project would take advantage of the unconsolidated sand and gravel soils on-site and employ the use of infiltration BMPs to address the Proposed Project's DCV.

- **Preserve Existing Drainage Patterns and Time of Concentration.** The proposed drainage pattern is consistent with existing drainage patterns, with all flows conveyed west to Anaheim Boulevard. According to Hydrology Report (contained in Appendix G), the time of concentration for the Proposed Project's runoff would decrease in comparison to the pre-project condition (11.31 minutes to 10.18 minutes).

- **Disconnect Impervious Areas.** The Proposed Project includes landscaping adjacent to walkways and parkways to break up the Project Site's impervious areas.

- **Protect Existing Vegetation and Sensitive Areas, and Revegetate Disturbed Areas.** The pre-Project site conditions consist of industrial uses with no vegetation or sensitive areas to preserve. The Proposed Project would pave or landscape all disturbed areas.

- **Xeriscape Landscaping.** The Proposed Project incorporates native and/or drought-tolerant landscaping into the site design, consistent with City guidelines.

Low Impact Development BMPs

Per the 4th Term Orange County Municipal Separate Storm Sewer System (MS4) Permit (Order No. R8-2009-0030, as amended by Order No. R8-2010-0062), LID BMPs must be incorporated into design features and

source controls to reduce project-related stormwater pollutants. The Proposed Project incorporates the use of infiltration BMPs to address the projects runoff pollutants.

Infiltration BMPs are LID BMPs that capture, store and infiltrate storm water runoff. These BMPs are engineered to store a specified volume of water and have no design surface discharge (underdrain or outlet structure) until this volume is exceeded.

Based on the project's predominant soil type and favorable infiltration rates, the Proposed Project would use of an underground infiltration system onsite and two parkway bioretention with no underdrain areas. The underground infiltration system will treat runoff created by onsite improvements and the two parkway bioretention with no underdrain areas will treat runoff created by the proposed street widening/improvements located within Anaheim Boulevard right-of-way.

The storage volume provided for the proposed infiltration system will consist of an underground vault with open bottom over a gravel bed. Runoff will receive pre-treatment via a proprietary biofiltration unit (MWS or approved equal) sized for the water quality flow. Drainage Management Area (DMA) 2 and 3 will propose bioretention with no underdrain systems, located within the Anaheim Boulevard public right-of-way, consistent with the project directly south of the site (RCP 2016-12078). With regards to DMA 3, due to utility constraints, 0.008 acres could not flow to the BMP. Therefore, the DMA 2 has been upsized to offset the additional area needed.

Structural and Nonstructural BMPs

In addition to the above site design and LID BMPs, the following structural and nonstructural BMPs, per the approved WQMP, would ensure that the Proposed Project does not degrade surface- or groundwater quality. Table 8, *Proposed Low Impact Development BMPs* , lists applicable BMPs from the WQMP . The Proposed Project is required to comply with the Orange County MS4 Permit and regulatory requirements of the RWQCB. Provided that the Project Applicant implements the BMPs according to the approved WQMP, the Proposed Project-related stormwater pollutant and water quality impacts would be less than significant, and no mitigation measures are required.

Table 8 Proposed Low Impact Development BMPs

BMP Name	Description
Structural Source Control BMPs	
S1 Provide storm drain system stenciling and signage	Storm drain stencils or signage prohibiting dumping and discharge of materials ("No Dumping – Drains to Ocean") shall be provided adjacent to each of the project's proposed inlets. The stencils shall be inspected and restenciled as needed to maintain legibility.
S3 Design and construct trash and waste storage areas to reduce pollution introduction	Designated trash enclosure areas shall be covered and designed to preclude trash and pad area from run-on, run-off and wind. Any drains within area shall be connected to the sanitary sewer system, with proper approval from the sewer company. Site shall be inspected with use to ensure all materials are disposed of properly.
S4 (SD-10, SD-12) Use efficient irrigation systems and landscape design, water conservation, smart controllers, and source control	In conjunction with routine landscaping maintenance activities, inspect irrigation for signs of leaks, overspray and repair or adjust accordingly. Adjust system cycle to accommodate seasonal fluctuations in water demand and temperatures. Ensure use

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Table 8 Proposed Low Impact Development BMPs

BMP Name		Description
		of native or drought tolerant/non-invasive plant species to minimize water consumption.
Nonstructural Source Control BMPs		
N1	Education for Property Owners, Tenants and Occupants	Educational materials will be provided to tenants at close of escrow by the owner and periodically thereafter by the property owners association (POA) to inform them of their potential impacts to downstream water quality. Materials include those described in Section VII of this WQMP and provided in the Final WQMP.
N2	Activity Restrictions	Activity restrictions to minimize potential impacts to water quality and with the purpose of protecting water quality will be prescribed by the project's Covenant, Conditions and Restrictions (CC&Rs), or other equally effective measure.
N3	Common Area Landscape Management	Maintenance activities for landscape areas shall be consistent with City, County and manufacturer guidelines for fertilizer and pesticide use (OC DAMP Section 5.5). Maintenance includes trimming, weeding and debris removal and vegetation planting and replacement. Stockpiled materials during maintenance activities shall be placed away from drain inlets and runoff conveyance devices. Wastes shall be properly disposed of or recycled.
N4	BMP Maintenance	Responsibility for implementation, inspection and maintenance of all BMPs (structural and non-structural) shall be consistent with the BMP Inspection and Maintenance Responsibilities Matrix provided in Section V of this WQMP, with documented records of inspections and maintenance activities completed.
N11	Common Area Litter Control	Litter control onsite will include the use of POA litter patrols, violation reporting and clean up during landscaping maintenance activities and as needed to ensure good housekeeping of the project's common areas.
N12	Employee Training	All employees, contractors and subcontractors of the POA shall be trained on the proper use and staging of landscaping and other materials with the potential to impact runoff and proper cleanup of spills and materials.
N14	Common Area Catch Basin Inspection	As required by the TGD, at least 80% of the project's private drainage facilities shall be inspected, cleaned/maintained annually, with 100% of facilities inspected and maintained within a two-year period. Cleaning should take place in the late summer/early fall, prior to the start of the wet season. Records shall be kept to document annual compliance.
N15	Street Sweeping Private Streets and Parking Lots	The project's private streets shall be swept, at minimum, on a weekly basis.
Infiltration BMP/Hydromodification Control BMP		
Underground Storage Chamber and Drywells		Storm water runoff is proposed to be conveyed to on-site streets where it is captured by catch basins and then transported to underground storage chambers and drywells via proposed storm drain infrastructure. The underground storage chambers are sized for storm water storage, flood control and hydromodification. Drywells are sized for storm water infiltration, treatment and hydromodification. Inclusion of storage chambers and drywells to meet hydromodification, flood control and LID treatment requirements will further reduce the proposed runoff to the City maintained existing storm drain system. Once the chambers and drywells are filled to their full capacity during a heavy storm event flows are to sheet flow through an outlet structure from the drywells and onto Lincoln Avenue.

Source: Hunsaker 2020b.

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

Less Than Significant Impact. The City receives approximately 75 percent of its water supply from the Orange County Groundwater Basin (OC Basin) and 25 percent from imported water. The Orange County

Water District (OCWD) manages the OC Basin, which underlies the northerly half of Orange County and covers approximately 350 square miles, bordered by the Coyote and Chino Hills to the north, the Santa Ana Mountains to the northeast, and the Pacific Ocean to the southwest. The City owns and operates a network of groundwater wells to supply potable water to their users (Anaheim 2004). OCWD manages pumping from the OC Basin through a process that uses financial incentives to encourage groundwater producers to pump a sustainable amount of water. The OCWD bases its framework for the financial incentives on establishing the basin production percentage, that is, the percentage of each producer's total water supply that comes from groundwater pumped from the OC Basin. Groundwater production at or below this percentage is assessed a Replenishment Assessment. The Proposed Project would lead to an increased demand for water, which could lead to an increase in groundwater pumping. However, a replenishment assessment fee is levied on cities in accordance with the Orange County Water District Act for the amount of groundwater extracted, and this fee is used by OCWD for various groundwater replenishment programs to prevent overdraft of local groundwater resources. OCWD recharges its groundwater primarily through artificial replenishment, not natural recharge.

Leighton and Associates conducted site exploration to a maximum depth of 50 feet and did not encounter groundwater. Based on historical data, groundwater in the vicinity is greater than 50 bgs (Hunsaker 2020b). California Department of Water Resources Data Library also indicated that a groundwater monitoring well near the eastern Project Site had its shallowest recorded groundwater monitoring depth of 89 bgs between February 1971 and August 2003. The Project Site is not a groundwater recharge area, and the Proposed Project would not interfere substantially with groundwater recharge. Therefore, the Proposed Project would not result in substantial groundwater supply impacts, and impacts would not be significant. No mitigation measures are required.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) Result in a substantial erosion or siltation on- or off-site?

Less Than Significant Impact. The Proposed Project would decrease the total impervious area on-site compared to existing conditions—from approximately 100 percent impervious to 83 percent impervious. During construction, the County of Orange would require the Project Applicant to comply with the NPDES Construction General Permit, which would require the preparation of a SWPPP that includes BMPs to reduce erosion and siltation. Compliance with the NPDES permit and implementation of the SWPPP would ensure that construction of the Proposed Project would not result in adverse water quality impacts.

After completion, the Proposed Project would provide a proprietary biofiltration BMP (Modular Wetland System or equivalent) on the Project Site and bioretention off-site in the Anaheim Boulevard right-of-way—BMPs that would reduce erosion and siltation during operation. Hunsaker & Associates conducted a stormwater flow rate analysis, as part of the preliminary drainage report, and determined that the Proposed Project would result in lower flow rates than existing conditions, as summarized in Table 9, *Summary of Existing and Proposed Runoff Flow Rate*. Therefore, the Proposed Project would not result in a negative impact to the City's storm drain system, because the flow leaving the Project Site would be less than existing conditions. Impacts would be less than significant, and no mitigation measures are required.

Table 9 Summary of Existing and Proposed Runoff Flow Rates

Runoff Conditions	Frequency		
	100-year Q	25-year Q	10-year Q
Existing	17.6 cfs	13.6 cfs	11.2 cfs
Proposed	16.9 cfs	13.0 cfs	10.9 cfs
Change	-0.7 cfs	-0.6 cfs	-0.3 cfs

Source: Hunsaker 2020a.
cfs: cubic feet per second

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

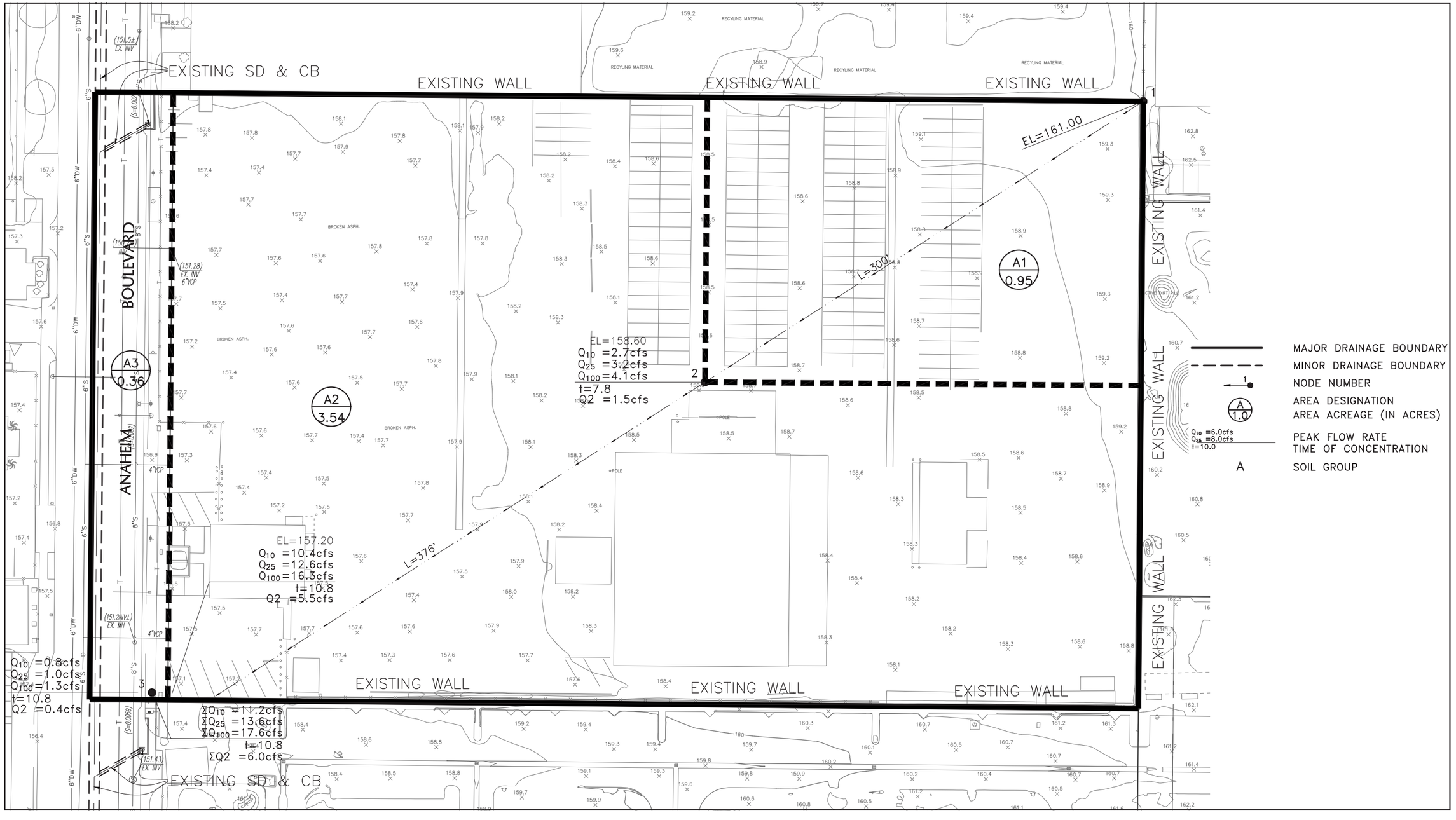
Less Than Significant Impact. The Project Site is currently an industrial site and is approximately 100 percent impervious—mostly parking covered with asphalt. Development of the Proposed Project would increase pervious surfaces by approximately 17 percent, from almost 100 percent impervious to 83 percent impervious. Runoff produced from the Project Site sheet flows toward the southwest corner through the driveway and discharges into an existing catch basin in Anaheim Boulevard. Block walls surround the Project Site to the north, east, and south; therefore, there is no off-site run-on. Figure 15, *Existing Hydrology Condition*, illustrates the existing drainage area designations and peak flow rates, and Figure 16, *Proposed Hydrology Condition*, illustrates the proposed drainage area designations and peak flow rates.

As shown in Figure 17, *Proposed Water Quality BMP* Plan the project design would divide runoff from the Project Site into five drainage subareas and drain into nodes 3 and 7, as described below.

Runoff produced from sub-areas A1 and A2 will drain into a proposed catch basin, node 3, and then drain into the existing 66" RCP located in Anaheim Boulevard. The Proposed Project would remove and relocate the existing 20-foot long catch basin in Anaheim Boulevard at the site's northwest corner to about 90 ft. to the south to accommodate the entry drive to the Proposed Project. The new 20-foot long catch basin will accommodate tributary flows from Anaheim Boulevard to the north, as it is the same size as the existing catch basin, which the Proposed Project is replacing. Furthermore, the Proposed Project includes an additional 6-foot long catch basin at the northwest corner of the site, north of the project's entry, to provide additional capacity, in combination with the relocated 20-foot long basin, for tributary flows from Anaheim Boulevard to the north. The 10-yr, 25-yr and 100-yr storm runoff produced from the site at node 3 is 4.7cfs, 5.6cfs and 7.3cfs, respectively.

Runoff produced from sub-areas A3 and A4 will drain into proposed pipes that connect into the back of a proposed catch basin, node 7. Runoff produced from sub-area A5, Anaheim Blvd. public street flows, will drain to the proposed catch basin at the site's southwest corner, node 7. This proposed 20- foot long catch basin, node 7, is to replace the existing 20-foot long catch basin just about 25 ft. to the south of the proposed location. The 10-yr, 25-yr and 100-yr storm runoff produced from the site at node 6 is 6.2cfs, 7.4cfs and 9.6cfs, respectively. Table 9 summarizes existing and proposed runoff conditions; the Proposed Project would result in decreased runoff from the Project Site and would not substantially affect the existing storm drain system.

Figure 15 - Existing Hydrology Condition

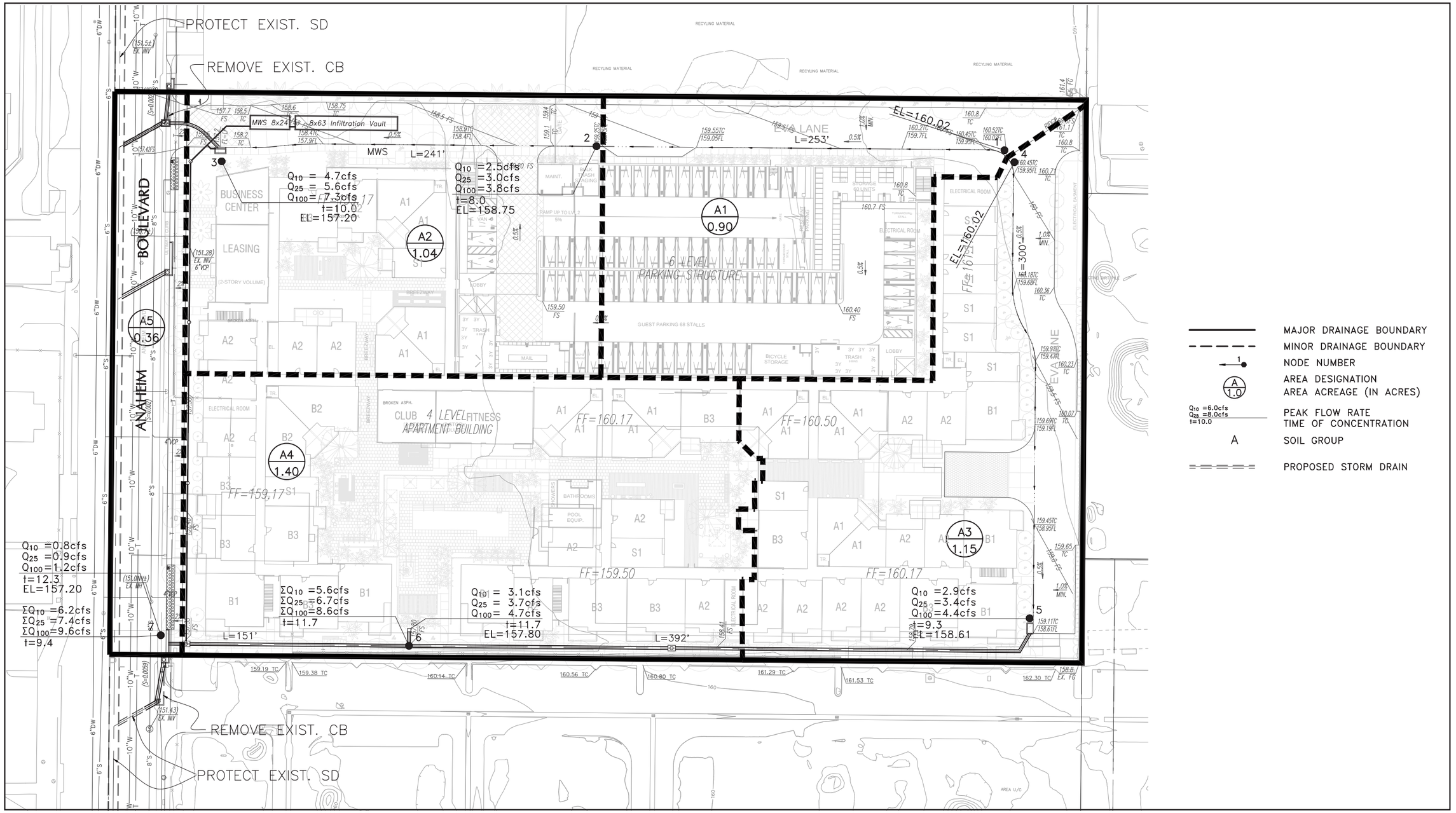


Source: Hunsaker & Associates, 2020

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Figure 16 - Proposed Hydrology Condition

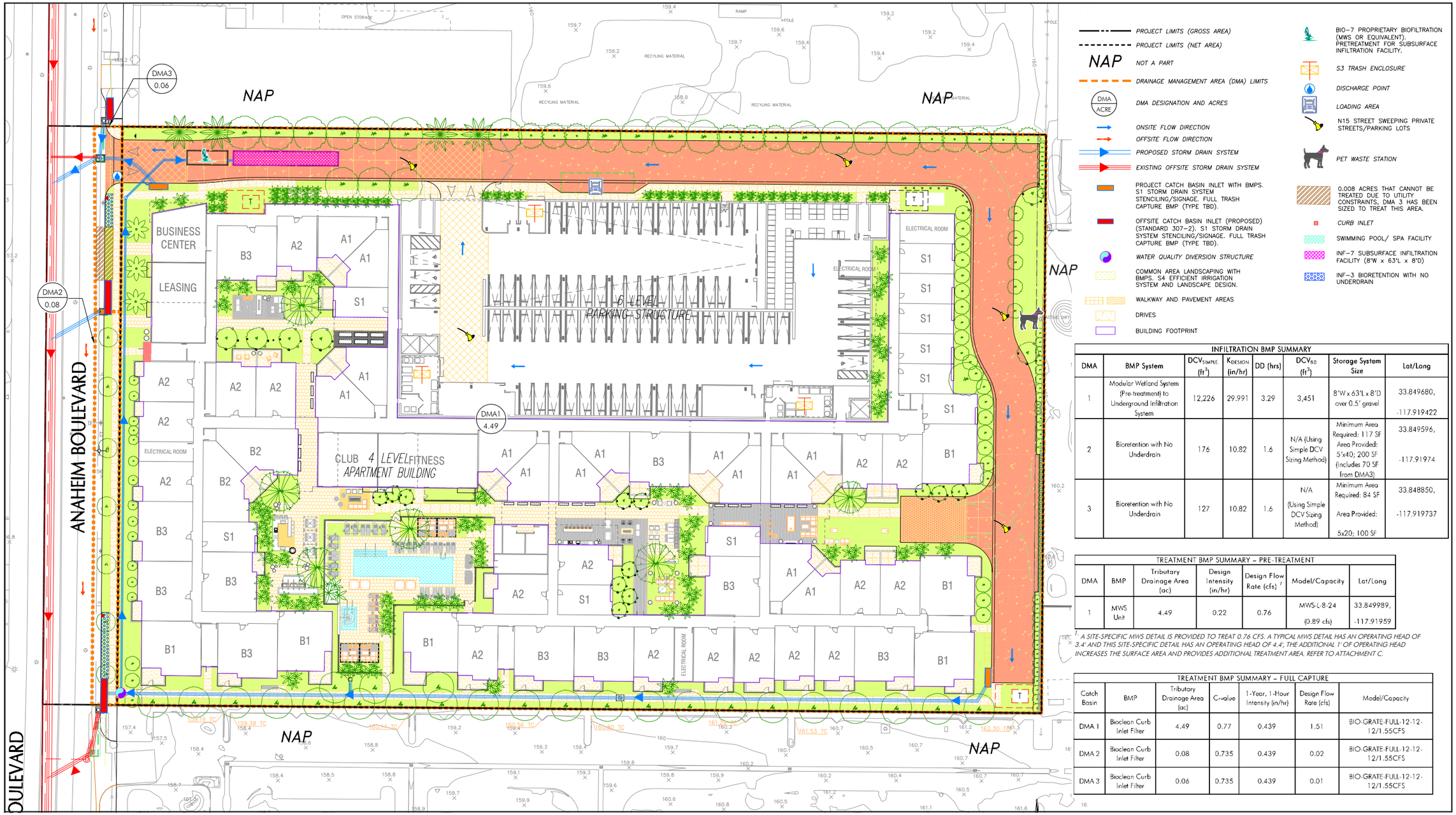


Source: Hunsaker & Associates, 2020

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Figure 17 - Proposed Water Quality BMP and DMA Plan



INFILTRATION BMP SUMMARY

DMA	BMP System	DCV_{SIMPLE} (ft^3)	K_{DESIGN} (in/hr)	DD (hrs)	DCV_{SIZE} (ft^3)	Storage System Size	Lat/Long
1	Modular Wetland System (Pre-treatment) to Underground Infiltration System	12,226	29.991	3.29	3,451	8'W x 63'L x 8'D over 0.5' gravel	33.849680, -117.919422
2	Bioretention with No Underdrain	176	10.82	1.6	N/A (Using Simple DCV Sizing Method)	Minimum Area Required: 117 SF Area Provided: 5'x40; 200 SF (Includes 70 SF from DMA3)	33.849596, -117.91974
3	Bioretention with No Underdrain	127	10.82	1.6	N/A (Using Simple DCV Sizing Method)	Minimum Area Required: 84 SF Area Provided: 5x20; 100 SF	33.848850, -117.919737

TREATMENT BMP SUMMARY – PRE-TREATMENT

DMA	BMP	Tributary Drainage Area (ac)	Design Intensity (in/hr)	Design Flow Rate (cfs) [1]	Model/Capacity	Lat/Long
1	MWS Unit	4.49	0.22	0.76	MWS-L-8-24 (0.89 cfs)	33.849989, -117.91959

[1] *A SITE-SPECIFIC MWS DETAIL IS PROVIDED TO TREAT 0.76 CFS. A TYPICAL MWS DETAIL HAS AN OPERATING HEAD OF 3.4' AND THIS SITE-SPECIFIC DETAIL HAS AN OPERATING HEAD OF 4.4'; THE ADDITIONAL 1' OF OPERATING HEAD INCREASES THE SURFACE AREA AND PROVIDES ADDITIONAL TREATMENT AREA. REFER TO ATTACHMENT C.*

TREATMENT BMP SUMMARY – FULL CAPTURE

Catch Basin	BMP	Tributary Drainage Area (ac)	C-value	1-Year, 1-Hour Intensity (in/hr)	Design Flow Rate (cfs)	Model/Capacity
DMA 1	Bioclean Curb Inlet Filter	4.49	0.77	0.439	1.51	BIO-GRATE-FULL-12-12-12/1.55CFS
DMA 2	Bioclean Curb Inlet Filter	0.08	0.735	0.439	0.02	BIO-GRATE-FULL-12-12-12/1.55CFS
DMA 3	Bioclean Curb Inlet Filter	0.06	0.735	0.439	0.01	BIO-GRATE-FULL-12-12-12/1.55CFS

0 50
Scale (Feet)

Source: Husnaker & Associates, 2020

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Hydrologic Conditions of Concern

As specified in Section 2.3.3 of the 2013 Model WQMP, projects must identify and mitigate any hydrologic conditions of concern (HCOC). An HCOC is a combination of upland hydrologic conditions and stream biological and physical conditions that presents a condition of concern for physical and/or biological degradation of streams.

In the North Orange County permit area, HCOCs exist if any streams located downstream from the project are determined to be potentially susceptible to hydromodification impacts and either of the following conditions exists:

- Post-development runoff volume for the 2-yr, 24-hr storm exceeds the predevelopment runoff volume for the 2-yr, 24-hr storm by more than 5 percent.

- Time of concentration (Tc) of post-development runoff for the 2-yr, 24-hr storm event is less than the time of concentration of the predevelopment condition for the 2-yr, 24-hr storm event by more than 5 percent.

Based on the County's current hydromodification susceptibility map, the Proposed Project is subject to the specific 2-year criteria previously noted. However, the project's Q2 Tc is greater in the post-development condition than in the pre-development condition, demonstrating hydromodification will not occur because of the project's development. In addition, the Q2 (cfs) and Q2 (volume, ac-ft) are less in the post development condition than in the pre-development condition, also demonstrating hydromodification will not occur because of the project's development. Therefore, even though the Project Site is with in an area with the potential for hydromodification, the Project's hydrology for the 2-year event demonstrates hydromodification will not occur as a result of the Proposed Project.(Hunsaker 2020b). Therefore, impacts would be less than significant, and no mitigation measures are required.

iii) Create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. As discussed under Section 3.10(a), the Proposed Project would be required to comply with NPDES requirements and implement BMPs during construction and operation. Additionally, as discussed in Section 3.10(c)(ii), the Proposed Project would decrease the total impervious area on the Project Site compared to existing conditions by approximately 17 percent, and also reduce stormwater runoff to below existing conditions. Therefore, the Proposed Project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Less than significant impacts would occur, and no mitigation measures are required.

iv) Impede or redirect flood flows?

Less Than Significant Impact. As discussed above, with the incorporation of the Proposed Project's stormwater infrastructure, the proposed 100-year peak flows would be less than the existing conditions,

and the Proposed Project would adequately retain flows on-site. The Proposed Project would represent a 0.7 reduction in cubic feet per second of runoff compared to existing conditions.

Furthermore, the ponding area at the southeast corner of the Project Site has an overflow elevation of 159.11 feet at the top of the curb, and the building immediately west of this ponding location has a finished floor of 160.17 feet. After passing this top of curb, water would flow west toward Anaheim Boulevard without standing water. The ponding location at the northwest corner of the Project Site has an overflow elevation of 157.50 feet, and the building immediately south of this ponding location has a finished floor of 159.17 feet. Therefore, the finished floor of buildings along these flow paths would exceed the required one foot above the finished surface at 1.06 feet and 1.67 feet, respectively. The Proposed Project would not impede or redirect flood flows, and impacts would be less than significant.

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

Less Than Significant Impact. According to the Federal Emergency Management Agency's Flood Insurance Rate Maps, the Project Site is not within the 100-year flood hazard zone (Flood Insurance Rate Map ID# 06059C0131J) (FEMA 2009). FEMA identifies the Project Site as Zone X, with a 0.2 percent annual chance of flood. Therefore, the Project Site is not in flood hazard area.

Tsunamis and seiches are large waves created when a body of water shakes. Tsunamis are waves generated in the ocean, and seiches occur in enclosed bodies of water, such as a lake or reservoir. Seiches are of concern relative to water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. Based on the absence of an enclosed water body near the Project Site and the inland location of the Project Site, the Geotechnical Exploration (Appendix C) determined that potential seiche and tsunami risks at the Project Site are negligible. Impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. The Santa Ana RWQCB and its Basin Plan regulate water quality in Anaheim and at the Project Site. The Basin Plan contains water quality goals and policies and identifies beneficial uses for receiving waters, along with water quality criteria and standards consistent with federal and state water quality laws. The Proposed Project would not violate any water quality standards and would therefore not obstruct the implementation of the Basin Plan. The County of Orange would require the Proposed Project to comply with the NPDES Construction General Permit and SWPPP requirements and implement BMPs. Therefore, impacts would be less than significant.

OCWD manages groundwater in the Orange County Basin. As discussed in Sections 3.10(a) and 3.10(b), the Proposed Project would not violate any water quality standards and would not decrease groundwater supplies or interfere substantially with groundwater recharge. Therefore, impacts would be less than significant.

3.11 LAND USE AND PLANNING

Would the project:

a) Physically divide an established community?

No Impact. The Project Site is fully developed and operating as an automobile tow yard. The La Palma Village condominium project is currently under construction immediately adjacent to the Proposed Project to the south. The nearest existing residential uses are approximately 65 feet to the west. Other nearby land uses include industrial, commercial, and park uses. There is no established community, which the Proposed Project would physically divide; it would continue the redevelopment of industrial land use to residential or mixed-use development, along Anaheim Boulevard, as identified in the City's General Plan Land Use element. The Proposed Project would not create any land use barriers, otherwise divide, or disrupt the existing physical arrangement of the surrounding community. No impact would occur.

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

Less Than Significant Impact With Mitigation Incorporated. The Proposed Project requires approval of a zoning reclassification and a conditional use permit. Adopted land use regulations applicable to the Project Site include the City's General Plan and zoning code. The Project Site has a land use designation of Mixed-Use High under the City's General Plan, which allows a mix of uses including residential, commercial, services, hotel, and professional office uses in a high-quality environment. The General Plan permits a residential density of 60 dwelling units per acre (du/ac) for the Mixed-Use High land use designation. Therefore, the proposed 60 du/ac for the Proposed Project would be consistent with the allowed density. The Mixed Use (MU) Overlay Zone implements the Mixed Use High General Plan land use designation.

The Proposed Project seeks a zoning reclassification to add the MU Overlay Zone to the Project Site's existing Industrial (I) Zone. While the Proposed Project would change the Project Site's existing zoning, it would be consistent with the General Plan Mixed-Use High land use designation. In addition, the proposed zoning would be consistent with the La Palma Village project, which is under construction immediately south of the Project Site, and within the MU Overlay Zone.

The Proposed Project is subject to the approval of a Conditional Use Permit. The Proposed Project would comply with the applicable zoning and development standards for Mixed Use (MU) Overlay Zone (AMC Chapter 18.32), with development standard modifications, which the Code permits as part of the approval of the proposed Conditional Use Permit. Therefore, the Proposed Project would not conflict with the City's zoning regulations.

Additionally, inconsistency with the existing land use plan does not automatically cause a significant environmental impact. In accordance with the holding in *Sierra Club v. County of Napa*, 121 Cal. App.4th 1490 (2004), "A given project need not be in perfect conformity with each and every general plan policy. To be consistent, a [project] must be 'compatible with' the objectives, policies, general land uses and programs specified in the general plan." Therefore, as discussed above, the Proposed Project is consistent (i.e.,

"compatible") with the City of Anaheim General Plan. Moreover, as shown in cases such as *DeVita v. County of Napa*, (1995) 9 Cal. 4th 763, 782 and *Big Creek Lumber Co. v. City of Santa Cruz*, (2006) 38 Cal. 4th 1139, 1159, a city's general police power allows it to establish land use and zoning laws that govern the development and use of the community. Just as the City adopted the General Plan in 2004, and various amendments since then, the Project Applicant is requesting a zoning reclassification of the Project Site, which is consistent with the current General Plan designation for the Project Site. Therefore, the Proposed Project is consistent with the City of Anaheim's General Plan goals and policies.

Although the Proposed Project would be consistent with the City's General Plan land use designation, as discussed in Section 3.17, *Transportation*, the Proposed Project would result in a level of service (LOS) delay impact on the intersection of Anaheim Boulevard/Carl Karcher Way during existing plus project, opening year cumulative (2023), the long-range conditions. While this impact is no longer a significant impact on the environment pursuant to Senate Bill 743 and Public Resources Code Section 21099, the City's General Plan Circulation Element establishes that the LOS should be LOS D or better for major intersections in the City, as stated below:

- GOAL 2.1: Maintain efficient traffic operations on City streets and maintain a peak hour level of service not worse than D at street intersections.
  - Policy 1) Make improvements to streets and intersections experiencing conditions worse than the applicable Level of Service standard by providing appropriate improvements.

Urban Crossroads prepared a Traffic Study for the Proposed Project (contained in Appendix J), which analyzes both LOS impacts pursuant to the above General Plan goal and policy, and Vehicle Miles Traveled pursuant to CEQA Guidelines Section 15064.3. Without the Proposed Project, the Traffic Study prepared for the Proposed Project concluded that the intersection of Anaheim Boulevard/Carl Karcher Way would operate at LOS F during AM and PM peak hours under all conditions with the exception of long-range condition AM peak hour where it operates at an LOS E. As such, conditions without the Proposed Project would already exceed the established LOS D threshold. In order to maintain efficient traffic operations on City streets, the Traffic Study recommended the following improvement for the existing, opening year cumulative (2023), the long-range conditions, consistent with the above General Plan goal and policy.

- #4 Anaheim Boulevard/Carl Karcher Way – Install Traffic Signal.

Because the Proposed Project would contribute to an intersection that will already be failing without the Proposed Project, payment of a fair share fee to install the traffic signal would provide the appropriate improvements to maintain efficient traffic operations, consistent with the Circulation Element Goal 2.1, Policy 1. Therefore, the following mitigation measure would reduce impacts related to the General Plan Circulation Element to a less than significant level.

Mitigation Measure

LU-1 Prior to approval of the first tentative tract map, the Project Applicant shall complete the following to the satisfaction of the Public Works Department

- The Project Applicant shall determine and develop cost estimates of the right-of-way and construction costs of improvements needed at Project Opening Year to install a Traffic Signal at Anaheim Boulevard and Carl Karcher Way, as described in *The Invitation (formerly known as Renaissance Apartments) Traffic impact Analysis* prepared by Urban Crossroads and dated July 2020.

- The Project Applicant shall submit said information to the Public Works Department for review and approval.

- The Project Applicant shall pay an appropriate fair share fee to install a traffic signal at the Anaheim Boulevard/Carl Karcher Way intersection to the Public Works Department.

3.12 MINERAL RESOURCES

Would the project:

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

No Impact. The General Plan's Green Element identifies mineral resources in the City. Figure G-3, Mineral Resources Map, of the Green Element identifies the northeastern portion of the City as being within a Mineral Resource Zone 2 (MRZ-2). MRZ-2 is an area where adequate information indicates that significant mineral deposits are present or a high likelihood of mineral deposits exists. Figure G-3 also shows areas of regionally significant aggregate resources, which are in the northeastern portion of the City as well. The Project Site is not in MRZ-2 nor within an area of regionally significant aggregate resources. Based on the Project Site's location, development of the Proposed Project would not result in the loss of available of known mineral resources. No impact would occur.

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

No Impact. The Project Site has a General Plan land use designation of Mixed-Use High, which does not allow for mineral extraction. The Project Site is in an urbanized area of Anaheim, and no mineral extraction operations currently occur within the vicinity of the Project Site. No impact would occur.

3.13 NOISE

Noise Fundamentals

Noise is unwanted sound, known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Based on these known adverse effects of noise, the federal, state, and city governments have established criteria to protect public health and safety and to prevent the disruption of certain human activities, such as classroom instruction, communication, or sleep. Appendix

3. Environmental Analysis

I provides the fundamentals of noise and vibration, additional local regulatory background information, and the construction and traffic noise modeling data for the Proposed Project.

Environmental Setting

The noise environment affecting the Project Site includes roadway noise and noise from the surrounding industrial sources. Roadway noise primarily comes from Anaheim Boulevard and La Palma Avenue. Surrounding industrial noise include, the Sunwest Metals recycling center to the north.

Sensitive Receptors

Certain land uses are particularly sensitive to noise and vibration. These uses include residences, schools, hospital facilities, houses of worship, and open space/recreation areas where quiet environments are necessary for the enjoyment, public health, and safety of the community. The Proposed Project is located near commercial and industrial uses. The nearest sensitive receptors to the Project Site include:

- Residences to the south adjacent to the site and southeast on North Kemp Street and La Palma Avenue (approximately 500-feet away).
- Glover Stadium and La Palma Park southwest of the Project Site across Anaheim Boulevard (approximately 300-feet away).
- The UC Irvine Health Family Health Center northwest of the Project Site across Anaheim Boulevard (approximately 300-feet away).
- Julianna Park located east of the Project Site on Julianna Street (approximately 600-feet away).

Per the *CBIA v. BAAQMD* ruling, noise compatibility for future on-site sensitive receptors is generally no longer the purview of the CEQA. However, the City requires projects to achieve the interior noise standards of the California Building Code Title 24 and exterior-to-interior noise insulation sufficient to achieve interior noise levels no greater than 45 dBA CNEL.

Ambient Noise Measurements

To determine existing noise levels at various locations in the project area, PlaceWorks conducted ambient noise monitoring within the project vicinity. The noise monitoring survey included one long-term measurement (48 hours), which a PlaceWorks noise specialist conducted along Anaheim Boulevard north of La Palma Avenue. The measurement took place between Wednesday, February 26 and Friday, February 28, 2020.

Traffic on Anaheim Boulevard and activities from the adjacent property to the north, Sunwest Metals, were the primary noise sources. Meteorological conditions included mostly clear skies, temperatures of 74 degrees Fahrenheit (°F), and average wind speeds of up to 3.3 miles per hour. The sound level meter was equipped with a windscreen during measurement.

The sound level meter used for noise monitoring (Larson Davis model LxT) satisfies the American National Standards Institute (ANSI) standard for Type 1 instrumentation. The sound level meter was set to "slow"

response and "A" weighting (dBA). The noise specialist calibrated the meter before and after the monitoring period. The measurement was at least five feet above the ground and away from reflective surfaces. Figure 18, *Approximate Noise Monitoring Locations*, shows the long-term noise measurement results summarized below.

Long-Term Location 1 (LT-1). LT-1 was on Anaheim Boulevard, north of La Palma Avenue, approximately 15 feet west of the nearest southbound travel lane centerline. The noise specialist conducted a 48-hour noise measurement, beginning at the 3:00 pm hour on Wednesday, February 26, 2020. The noise environment at this site was primarily from traffic on Anaheim Boulevard. Hourly average noise levels ranged from 64 to 76 dBA L_{eq}.

Ambient Noise Results

Table 10, *Long-Term Noise Measurement Levels*, summarizes the long-term noise measurement results. Appendix I provides a summary of the daily trend during the long-term noise measurement.

Table 10 Long-Term Noise Measurement Levels (dBA)

Monitoring Location	Description	CNEL	Lowest $L_{eq, 1\text{-}hr}$	Highest $L_{eq, 1\text{-}hr}$
LT-1	Anaheim Boulevard – North of La Palma	78	64	76

Applicable Standards

State Regulations

The State of California regulates freeway noise, sets standards for sound transmission, provides occupational noise control criteria, identifies noise standards, and provides guidance for local land use compatibility. State law requires that each county and city adopt a general plan that includes a noise element prepared according to guidelines adopted by the Governor's Office of Planning and Research. According to these guidelines, the purpose of the noise element is to "limit the exposure of the community to excessive noise levels."

California Code of Regulations, Title 24, Chapter 12

Current law states that every local agency enforcing building regulations, such as cities and counties, must adopt the provisions of the CBC within 180 days of its publication. The California Building Standards Commission establishes the publication date of the CBC. The most recent building standards adopted by the legislature and used throughout the state is the 2019 version. Jurisdictions often adopt local, more restrictive amendments based on local geographic, topographic, or climatic conditions. The State of California codifies noise insulation standards in the CBC. These noise standards are for new construction in California for the purposes of interior compatibility with exterior noise sources. The regulations specify that acoustical studies must be prepared when new buildings with habitable rooms that are near major transportation noises, and where such noise sources create an exterior noise level of 60 dBA CNEL/L_{dn} or higher. Acoustical studies that accompany building plans must demonstrate that the structure design limits interior noise in habitable rooms to 45 dBA CNEL/L_{dn}.

3. Environmental Analysis

City of Anaheim

Stationary Sources of Noise

AMC Chapter 6.70, Sound Pressure Levels, regulates stationary sources of noise. Section 6.70.010 states that "no person shall, within the City, create any sound, radiated for extended periods from any premises which produces a sound pressure level at any point on the property in excess of 60 dBA." AMC Section 6.70.010 also exempts certain noise sources from the provisions of this code, including traffic sounds, sound created by emergency activities, and sound created by governmental units.

Residential Zoning Noise Regulations

AMC Section 18.40.090, Sound Attenuation for Residential Developments, applies to residential developments involving the construction of two or more dwelling units or residential subdivisions resulting in two or more parcels and within 600 feet of any railroad, freeway, expressway, major arterial, primary arterial, or secondary arterial, as designated by the circulation element of the general plan. A noise level analysis is required for any new residential development or subdivision that meets these criteria, which must include mitigation measures to comply with applicable City noise standards, including but not limited to:

- Exterior noise within the private rear yard of any single-family lot and/or within any common recreation areas shall be attenuated to a maximum of 65 dBA CNEL; interior noise levels shall be attenuated to a maximum of 45 dBA CNEL, or to a level designated by the UBC, as adopted by the City (AMC Section 18.40.090).

- Exterior noise within common recreation areas of any single-family attached or multiple-family dwelling project shall be attenuated to a maximum of 65 dB CNEL; interior noise levels shall be attenuated to a maximum of 45 dB CNEL, or to a level designated by the Uniform Building Code, as adopted by the City (AMC Section 18.40.090).

According to AMC Section 18.040.090.060, the Planning Commission may grant a deviation from the requirements pertaining to exterior noise levels, given that all of the following conditions exist:

- The deviation does not exceed 5 dB above the prescribed levels for exterior noise.

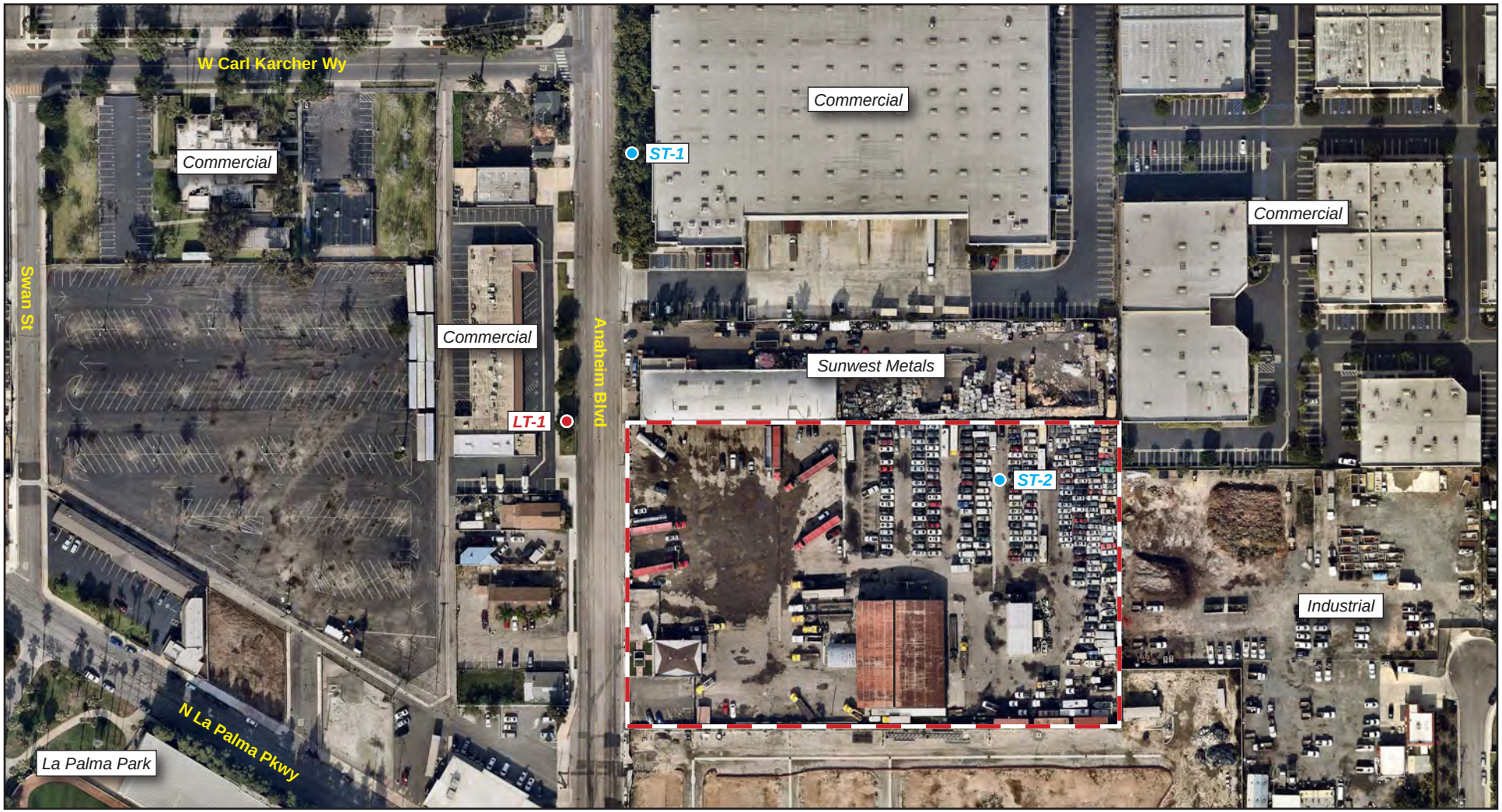
- Measures to attenuate noise to the prescribed levels would compromise or conflict with the aesthetic value of the project.

Compliance with the City's Residential Noise Regulations relates to impacts of the existing environment on the Proposed Project, which, consistent with relevant case law, is not under the purview of CEQA. However, a Title 24 Noise Analysis has been prepared for the Proposed Project and conditions of approval have been recommended to maintain compliance with the City interior and exterior noise standards.

Construction Noise

The City does not have established noise limits for temporary construction activities. Therefore, the Federal Transit Administration (FTA) construction noise criterion of 80 dBA $L_{eq(8hr)}$ for residential receptors will be used in this analysis to assess construction noise impacts.

Figure 18 - Approximate Noise Monitoring Locations



Source: Nearmap, 2020

3. Environmental Analysis

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Construction Vibration

The City does not have specific limits or thresholds for vibration. The FTA provides criteria for acceptable levels of ground-borne vibration for various types of buildings. This analysis uses the FTA criteria. Table 11, *Groundborne Vibration Criteria: Architectural Damage* shows FTA vibration thresholds based on the type of building structure.

Table 11 Groundborne Vibration Criteria: Architectural Damage

Building Category		PPV (in/sec)
I.	Reinforced concrete, steel, or timber (no plaster)	0.5
II.	Engineered concrete and masonry (no plaster)	0.3
III.	Non-engineered timber and masonry buildings	0.2
IV.	Buildings extremely susceptible to vibration damage	0.12

Source: Federal Transit Administration (FTA), 2018.
PPV = peak particle velocity

Would the project result in:

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

Less Than Significant Impact.

Construction Noise

Construction Vehicles

The transport of workers and materials to and from the construction site could incrementally increase noise levels along access road or roads. Individual construction vehicle pass-bys may create momentary noise levels of up to approximately 85 dBA (L_{max}) at 50 feet from the vehicle, but these occurrences would generally be infrequent and short lived.

Construction generates temporary trips from workers and vendors vehicles. The Project Applicant anticipates that Project construction would generate a maximum of 470 worker and vendor trips during the overlapping phases of building construction, architectural coating, and asphalt paving. For haul trucks, construction activities would generate up to eight daily haul truck trips during the building demolition phase. Access to the Project Site would be via Anaheim Boulevard, which has existing average daily traffic (ADT) volumes ranging from 13,999 to 27,671 trips.[2] The addition of 470 worker vendor trips would result in an approximately 0.1 dBA increase. Although there are residences to the west of the Project Site across Anaheim Boulevard, an increase of 0.1 dBA is negligible increase. Therefore, this impact would be less than significant.

[2] ADT volumes vary by segment. For Anaheim Boulevard, ADT south of SR-91 westbound ramps are 27,671, south of SR-91 eastbound ramps are 22,139, and north of La Palma Avenue are 13,999.

3. Environmental Analysis

Construction Equipment

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

The noise produced at each construction phase is determined by combining the L_{eq} contributions from each piece of equipment used at a given time, while accounting for the ongoing time variations of noise emissions (commonly referred to as the usage factor). Heavy equipment, such as a dozer or a loader, can have maximum, short-duration noise levels of up to 85 dBA at 50 feet. However, overall noise emissions vary considerably, depending on the specific construction activity performed at any given moment. Noise attenuation due to distance, the number and type of equipment, and the load and power requirements to accomplish tasks at each construction phase would result in different noise levels from construction activities at a given receptor. Since noise from construction equipment is intermittent and diminishes at a rate of at least 6 dBA per doubling of distance (conservatively ignoring other attenuation effects from air absorption, ground effects, and shielding effects), the average noise levels at noise-sensitive receptors could vary considerably, because mobile construction equipment would move around the Project Site with different loads and power requirements. Noise levels from project-related construction activities were calculated from the simultaneous use of all applicable construction equipment during each phase at spatially averaged distances (i.e., from the acoustical center of the general construction site) to the property line of the nearest receptors. Although construction may occur across the entire construction area, the area around the center of construction activities best represents the potential average construction-related noise levels at the various sensitive receptors.

Staff used phased construction activity information provided by the Project Applicant and CalEEMod air quality model defaults to estimate construction noise using the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM). The associated, aggregate sound levels—grouped by construction activity—are summarized in Table 12, *Project-Related Construction Noise, L_{eq} dBA*. RCNM modeling input and output worksheets are included in Appendix I.

Table 12 Project-Related Construction Noise, L_{eq} dBA

Construction Activity Phase	Nearest Residences 750 feet south and southeast	La Palma Park/Clover Stadium 560 feet southwest	Irvine Health Family Health Center 750 feet northwest
Building Demolition	57	60	57
Asphalt Reprocessing and Site Prep	62	65	62
Asphalt Reprocessing & Grading	62	65	62
Grading & Utility Trenching	62	65	62
Utility Trenching	55	58	55
Building Construction	59	62	59
Architectural Coating	50	53	50
Paving	62	65	62
Finish & Landscaping	55	58	55
Rock Crushing[1]	54	57	54

Notes:
Calculations performed with the FHWA RCNM software are included in Appendix I. Distance measurements were taken using Google Earth 2020 from the approximate acoustical center of the construction site.
Decibels rounded to the nearest whole number.
[1] Rock Crushing equipment based on 85 dB at 7 meters (approximately 22 feet). Sources: Screens & Crushers Ltd C12+ Crusher Extec. 2007, November. Operating and Maintenance Manual.

As shown in Table 12, construction-related noise levels would not exceed the 80 dBA $L_{eq(8hr)}$ threshold at the nearest sensitive receptors, and therefore would be less than significant.

Stationary Noise during Operation

Common Recreational Areas

The Proposed Project proposes several recreational spaces, green spaces, a forecourt, game space, game courtyard, social courtyard, and pool courtyard. During operation, the nearest sensitive receptors to the proposed recreational space of the Project would be the future planned and approved residential apartments to the south, La Palma Village. La Palma Village would be approximately 80 feet from the center of the proposed pool courtyard. The dominant noise source from communal gathering spaces is noise from conversations. A typical conversation between two people three feet apart is approximately 60 dBA. At a distance of 80 feet, noise associated with speech would attenuate to approximately 31 dBA. This would be below the AMC limit of 60 dBA. In addition, the Proposed Project would have a six-foot-tall block sound wall along the southern boundary, providing additional noise attenuation. Noise impacts from project-related recreational outdoor areas would be less than significant.

Mechanical Equipment

Typical HVAC noise is 72 dBA at three feet. The nearest sensitive receptors to potential HVAC equipment would be the future residences of La Palma Village to the south. Based on available site plans, the nearest mechanical equipment to the sensitive receptor property line would be approximately 50 feet. At that distance, HVAC noise levels would attenuate to approximately 48 dBA. This would not exceed the AMC limit of 60 dBA, and therefore would be less than significant.

3. Environmental Analysis

Traffic Noise

With respect to project-related increases, staff analyzed the noise impacts in three categories. The first is "audible" impacts, which refer to increases in noise level that are perceptible to humans. Audible increases generally refer to a change of 3 dBA or more since this level has been found to be the threshold of perceptibility in exterior environments. The second category, "potentially audible" impacts, refers to a change in noise level between 1 and 3 dBA. The last category includes changes in noise level of less than 1 dBA, which are typically "inaudible" to the human ear except under quiet conditions in controlled environments. Only "audible" changes in noise levels at sensitive receptor locations (i.e., 3 dBA or more) are considered potentially significant. A doubling of traffic flows (i.e., 10,000 vehicles per day to 20,000 per day) would be needed to create a 3 dBA CNEL increase in traffic-generated noise levels. A project will normally have a significant effect on the environment related to noise if it will substantially increase the ambient noise levels for adjoining areas. Most people can detect changes in sound levels of approximately 3 dBA under normal, quiet conditions, and changes of 1 to 3 dBA are detectable under quiet, controlled conditions. Changes of less than 1 dBA are usually indiscernible. A change of 5 dBA is readily discernible to most people in an exterior environment. Based on this, the following thresholds of significance used to assess traffic noise impacts at sensitive receptor locations:

- Up to 1.5 dBA increase for ambient noise environments of 65 dBA CNEL and higher.
- Up to 3 dBA increase for ambient noise environments of 60 to 64 CNEL.
- Up to 5 dBA increase for ambient noise environments of less than 60 dBA CNEL.

Staff used the ADT volumes provided by Urban Crossroads along study roadway segments in the traffic study area to analyze traffic noise increases due to the Proposed Project. This analysis compares Existing with Project ADT to Existing No Project ADT logarithmically to estimate the noise increase along the study roadway segments. The additional trips generated by the Proposed Project would result in a permanent noise level increase of up to 0.2 dBA CNEL on Anaheim Boulevard south of La Palma Avenue. Considering ambient noise measurements showed existing noise levels to be greater than 65 CNEL, the permanent noise increase of less than 1.5 dBA CNEL would be less than significant.

Cumulative traffic noise increase was determined by comparing Future Plus Project to Existing No Project ADT. The resulting cumulative noise increase would be up to 6.7 dBA CNEL on the Anaheim Boulevard south of La Palma Avenue segment. Since the cumulative increase is greater than 1.5 dBA CNEL, the project's contribution to the cumulative increase is calculated by comparing the Future With Project to Future No Project ADT. According to data provided by Urban Crossroads, the project's contribution would be zero trips, which would result in a 0 dBA contribution. All other roadway segment cumulative increases are less than 1.5 dBA CNEL. Therefore, this impact would be less than significant.

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

Less Than Significant Impact With Mitigation Incorporated.

Construction Vibration

Construction can generate varying degrees of ground vibration, depending on the construction procedures and equipment. Operation of construction equipment generates vibrations that spread through the ground and diminish with distance from the source. The effect on buildings near the construction site varies depending on soil type, ground strata, and receptor-building construction. The effects from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Vibration from construction activities rarely reaches the levels that can damage structures.

For reference, a vibration level of 0.3 inch per second (in/sec) peak particle velocity (PPV) is used as the limit for engineered concrete and masonry buildings, which could be applied to the surrounding structures (FTA 2018). For reference, Table 13, *Vibration Levels for Typical Construction Equipment*, shows typical construction equipment produce vibration levels up to 0.21 in/sec PPV at a distance of 25 feet. At 20 feet, vibration levels from a vibratory roller would be just below 0.3 in/sec PPV. In order to avoid a potentially significant impact, any construction activities requiring the use of a vibratory roller would have to be at least 20 feet from the nearest structure.

Table 13 Vibration Levels for Typical Construction Equipment

Equipment	FTA Reference Vibration Levels PPV (in/sec) at 25 feet	PPV (in/sec) at 20 feet
Vibratory Roller	0.21	0.293
Large Bulldozer	0.089	0.124
Loaded Trucks	0.079	0.106
Jackhammer	0.035	0.049
Small Bulldozer	0.003	0.001

Source: Federal Transit Administration (FTA), 2018.

The nearest structure to the Project Site is the adjacent Sunwest Metals building to the north. Based on available site plans, the Sunwest Metals building could be within 20 feet of paving activities for the proposed Eva Lane. Due to its proximity to the proposed Eva Lane entry driveway and potential use of a vibratory roller for paving, impacts would be potentially significant. However, with implementation of Mitigation Measure N-1, impacts would be reduced to a level of less than significant. Specifically, use of a static roller is predicted to generate vibration levels of approximately 0.05 in/sec PPV at a distance of 25 feet (New Zealand Transport Agency 2012). This would result in vibration levels of less than 0.3 in/sec PPV at a distance of approximately 8 feet or greater.

Operational Vibration

Operation of the Proposed Project would not include any substantial long-term vibration sources. Thus, no significant vibration effects from operation of the Proposed Project would occur. No mitigation measures are required.

Mitigation Measure

Construction

N-1 Prior to any permit issuance, the Project Applicant shall specify in the construction note and ensure that a static roller in lieu of a vibratory roller shall be used during paving activity within 20 feet of nearby structures.

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

No Impact. The nearest public airport is Fullerton Municipal Airport, approximately 3.4 miles northwest of the Project Site, and the nearest private air strip is the Los Alamitos Army Airfield, approximately 6 miles to the southwest. There would be no impact.

3.14 POPULATION AND HOUSING

Would the project:

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

Less Than Significant Impact. The Proposed Project could result in a substantial unplanned population growth if the estimated development would exceed local or regional population growth projections. Federal and State law requires the Southern California Association of Governments (SCAG) to develop a Regional Transportation Plan/Sustainable Communities Strategy every four years. The purpose of the RTP/SCS is to provide a "long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern" (SCAG 2020). The RTP/SCS is an important regional document to guide land use planning and transportation projects in the region. Demographic projections and changes in the region are therefore an essential component for the RTP/SCS. In conjunction with the RTP/SCS, SCAG develops the Regional Housing Needs Assessment (RHNA) every eight years. SCAG is currently preparing the RHNA for the 2021-2029 timeframe in conjunction with the 2020-2045 RTP/SCS (Connect SoCal Plan), which SCAG anticipates the Regional Council will adopt in October 2020. The Connect SoCal Plan was adopted on May 7, 2020 (SCAG 2020a) for federal transportation conformity purposes only. In light of the COVID-19 pandemic, the Regional Council will consider approval of Connect SoCal in its entirety and for all other purposes within 120 days from May 7, 2020.

Table 14, *Population and Housing Growth Projections for the City of Anaheim*, shows that the 2020-2045 RTP/SCS projections for the City are growth of 16.85 percent, 21.36 percent, and 27.03 percent in population, housing, and employment, respectively, by 2045 based on 2016 levels. The City's General Plan designates the Project Site for Mixed-Use High land use, which allows residential uses at a density of up to 60 dwelling units per acre consistent with the Proposed Project. Each City's General Plan Land Use Element is considered in the

development of the RTP/SCS. Therefore, the Proposed Project does not require a general plan amendment and would not increase the City's or SCAG's buildout land use assumptions.

Table 14 Population and Housing Growth Projections for the City of Anaheim

	2016	2040	2045	Change 2016-2045	Percent Increase	Proposed Project	2045 Plus Project
Population	356,700	403,400	416,800	60,100	16.85%	920	417,720
Household	101,100	122,600	122,700	21,600	21.36%	269	122,969
Employment	197,200	245,600	250,500	53,300	27.03%	0	250,500
Jobs-Housing Ratio	1.95	2.00	2.04	n/a	n/a	n/a	2.04

Sources: SCAG 2020b. 2020-2045 RTP-SCS. Demographics & Growth Forecast; and SCAG. 2016. 2016-2040 RTP-SCS. Appendix: Demographics & Growth Forecast.

The Proposed Project consists of the development of 269 multifamily residential units for rent. This analysis assumed that, based on the average household size of 3.42 persons per household for renter-occupied units (ACS 2017), the Proposed Project could generate approximately 920 residents. The Proposed Project's anticipated population and housing units would represent approximately 1.5 percent of the projected growth in the City's population and approximately 1.2 percent of the City's housing growth from 2016 to 2045.

As shown in Table 14, the City's jobs-housing ratio was be 1.95 (197,200 jobs/101,100 housing = 1.95) in 2016, and SCAG projects that the City's jobs-housing ratio will be 2.04 (250,500 jobs/122,700 housing = 2.04) in 2045 without the Proposed Project. To be conservative, the analysis assumed that all 920 residents are new residents to the City, even though a portion of the projected residents may relocate from other parts of Anaheim. The analysis for the Proposed Project anticipates that jobs-housing ratio in 2045 with implementation of the Proposed Project would be 2.04 (250,500 jobs/122,969 housing = 2.04); therefore, there will be no changes to the jobs-housing ratio with the implementation of the Proposed Project. Although the Proposed Project would add new dwelling units and contribute to new residents in the City, the increase is minimal compared to the anticipated citywide growth projections. In addition, the Proposed Project is consistent with the Project Site's General Plan land use designation, which is the basis for these projections. The Proposed Project would not induce substantial unplanned population growth in the area. The Proposed Project would result in a less than significant impact.

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

No Impact. The Project Site is fully developed and operating as an automobile tow yard. Therefore, no existing persons or housing currently resides at the Project Site. For this reason, the Proposed Project would not displace persons or housing. No impact would occur.

3.15 PUBLIC SERVICES

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

a) Fire protection?

Less Than Significant Impact. The City of Anaheim Fire and Rescue (Fire & Rescue) provides fire protection services to the Project Site. Fire & Rescue has 11 fire stations across the City. The operations division of the Fire & Rescue, which responds to emergency calls, has approximately 200 personnel, 11 engines, 6 truck companies, 6 ambulances, 2 paramedic squads, and 2 battalion chiefs. The Fire & Rescue Standards of Cover report (2017) provides performance metrics for existing facilities. Table 15, *Response Times for Fire and Emergency Medical Services*, provides the response times for Fire & Rescue services.

Table 15 Response Times for Fire and Emergency Medical Services

	Structure Fire	EMS
First-Due Unit	8 min 17 sec	9 min 4 sec
Effective Response Force	12 min 26 sec	11 min 59 sec

Source: Anaheim Fire & Rescue 2017.
Response times are based on data collected between 2012 and 2016.

The nearest fire station to the Project Site is Fire Station No. 1 at 500 E. Broadway Street, approximately 1.1 miles to the south; other nearby stations are Fire Station No. 2, approximately 2.2 miles to the southwest, and Fire Station No. 5, approximately 2.2 miles to the east.

Fire Station No. 1 provides first emergency fire rescue to the Project Site. Fire Station No. 1 houses Paramedic Engine 1, Paramedic Truck 1, Light/Air Unit 1, Wildland Engine 301, and Ambulance 1. Fire Station No. 2 houses Paramedic Engine 2, Paramedic Truck 2, CARE Anaheim Ambulance 2, Regional Urban Search and Rescue trailer (USAR) 2, Patrol 2, Engine 22, and Water Rescue Boat 2. Fire Station No. 5 has one engine company with four firefighters and two emergency medical technicians.

As discussed in Section 3.14(a), the Proposed Project's population and housing is within the growth projections for the City and the Proposed Project is consistent with the Project Site's General Plan land use designation, which is the basis for these projections. While the Proposed Project may lead to an increase in the demand for fire protection services by adding new residents and housing units to the city, such an increase is within the projected growth for the city. Therefore, staff analysis anticipates that existing fire services would be within Fire & Rescue's existing capacity. Additionally, the Proposed Project would be required to comply with applicable building standards and fire codes in place to reduce fire hazards on a Project Site. The Project Applicant would also be required to pay applicable impact fees for the Proposed Project. These fees are in place for any incremental development project impact and used for infrastructure improvements. The Proposed Project would result in a less than significant impact to fire services.

b) Police protection?

Less Than Significant Impact. The Anaheim Police Department (APD) provides crime prevention services to the City. The Adopted Fiscal Year 2019-2020 Operating Budget states that there are 401 sworn law enforcement personnel. The addition of new officers in the last five years (approximately 53 police officers and 2 police dispatchers) has reduced the response times for Priority 1 calls. Additionally, the Adopted Fiscal Year 2019-2020 Operating Budget further allocates $1.5 million to APD to hire sworn officers to make up for an increase in anticipated retirements. Therefore, the City has taken actions to ensure that there are sufficient police protection facilities to serve the City. APD has three Districts—Central, East, and West—and the Project Site is in the Central District (APD 2020). The Main Police Station at 425 S. Harbor Boulevard, approximately 1.25 miles to the south of the Project Site, provides police protection service to the Project Site. As discussed in Section 3.14(a), the Proposed Project's population and housing is within the growth projections for Anaheim.

As discussed in Section 3.14(a), the Proposed Project's population and housing is within the growth projections for the City and the Proposed Project is consistent with the Project Site's General Plan land use designation, which is the basis for these projections. While the Proposed Project may lead to an increase in the demand for police protection services by adding new residents and housing units, such an increase is within the projected growth for the city, and the Proposed Project would be required to pay all applicable impact fees. These fees are in place to address any incremental development project impact and used for infrastructure improvements. The Proposed Project would also include gates and fences and security lighting that would deter criminal activity on the Project Site. The Proposed Project would result in a less than significant impact to police services, and no mitigation measures are required.

c) Schools?

Less Than Significant Impact. The Anaheim Elementary School District (AESD) and the Anaheim Union High School District (AUHSD) would serve the Proposed Project. The AESD serves grades kindergarten through six and offers pre-kindergarten and transitional kindergarten. The AUHSD serves grades seven through twelve. The Project Site is in the attendance boundaries of Anaheim High School (9–12) at 811 W. Lincoln Avenue; Sycamore Junior High School (7–8); and Horace Mann Elementary School (K–6) at 600 West La Palma Avenue. Table 16, *Schools Serving the Project Site*, summarizes each of the school's grades and enrollment.

Table 16 Schools Serving the Project Site

School	Distance from Project Site (Commuting distance)	Total Enrollment			
		2015-2016	2016-2017	2017-2018	2018-2019
Horace Mann Elementary School	0.3 miles	931	894	848	807
Sycamore Junior High School	1.25 miles	1,435	1,399	1,403	1,337
Anaheim High School	0.8 miles	3,164	3,077	3,115	3,099

Source: CDE 2020.

The Proposed Project would construct 269 multifamily for-rent units. Table 17, *New Student Generation Summary*, shows that the Proposed Project would generate approximately 76 elementary students, 20 junior high school students, and 38 high school students.

Table 17 New Student Generation Summary

School Level	Dwelling Units	Multi-Family Attached Units Student Generation Factors	Students
Elementary (Grades K–6)	269	0.2792	76
Middle (Grades 7–8)	269	0.0741	20
High (Grades 9–12)	269	0.1389	38
	Total	0.4922	134

Based on the current trend of declining enrollment in the area schools, addition of students generated by the Proposed Project would not substantially increase enrollment beyond historical enrollment levels. Moreover, the Proposed Project would be required to pay school impact fees pursuant to SB 50 to reduce impacts to the school system. School districts collect these fees at the time of issuance of building permits. Although the Proposed Project would cause an incremental increase in the demand for school facilities, the Proposed Project would offset this demand by the payment of school fees. The State legislature has found that funding program established by SB 50 constitutes "full and complete mitigation of the impacts" on the provision of adequate school facilities (Gov't Code Sec. 65995(h)). SB 50 sets forth a state school facilities construction program that includes restrictions on a local jurisdiction's ability to demand mitigation of a project's impacts on school facilities in excess of fees in Education Code 17620. Therefore, project-related impact to school facilities would be less than significant and no mitigation measures are required.

d) Parks?

Less Than Significant Impact. The Proposed Project directly increases population in the area by 920 residents, as discussed in Section 3.14, *Population and Housing*, and would create a demand for park resources. The nearest park from the Project Site is La Palma Park at 1151 North Anaheim Boulevard, approximately 230 feet to the southwest, a 21-acre community park with amenities such as Glover Stadium, recreation center, group picnic shelter, open play area, barbeque facilities, dog park, etc. Julianna Park, a 0.5-acre special use park at 309 Julianna Avenue, is approximately 575 feet from the Project Site and provides a children's play area and group picnic shelter. Manzanita Park is approximately 0.4 mile to the northwest, a 7.5-acre park with children's play area, football/soccer field, outdoor basketball court, picnic area, restrooms, and youth center. In addition to these nearby parklands, there are 54 other parks in Anaheim totaling approximately 800 acres to support the citywide parkland demands (Anaheim 2020c). Based on the City's two acres per 1,000 resident parkland standard, approximately 800 acres of parks are adequate to serve approximately 400,000 Anaheim residents. Anaheim's estimated 2020 population is 358,600 residents; therefore, the City is currently meeting its parkland standard.

The Proposed Project would construct 269 multifamily units in the city. As discussed in Section 3.14(a), the Proposed Project's population and housing is within the growth projections for the City and the Proposed Project is consistent with the Project Site's General Plan land use designation, which is the basis for these projections. Pursuant to AMC Section 17.34, Development Fees, the Project Applicant is required to dedicate a portion of the land on-site for open space and pay a fee for the development of park and recreational facilities; or, pay a fee in lieu of dedication prior to the issuance of a building permit. The City uses the in lieu fee for

the future off-site park development. AMC Section 17.34.030 provides a population density to use for calculating parkland impact of 3.11 persons per dwelling unit for five or more dwelling units. Therefore, according to this fee calculation, the proposed 269 multifamily units would generate 837 persons, and the Project Applicant would pay the in-lieu fee amount pursuant to AMC Section 17.34. Moreover, the Proposed Project would provide on-site common recreational amenities and open space totaling 52,790 square feet, including four courtyards with different themes, game space, two green spaces, club and fitness area, pool courtyard, paseo, and a roof deck, as shown in Figure 11, to offset the park and recreational demands generated by the Proposed Project.

Therefore, with required compliance to AMC 17.34 and the on-site provision of ample recreation and open space amenities, the impact of the Proposed Project on parks would be less than significant, and no mitigation measures are required.

e) Other public facilities?

Less Than Significant Impact. In addition to the public facilities discussed in Sections 3.15(a) to (d), this analysis anticipates that a portion of the project residents would use the City's public libraries. The Anaheim library system includes a central library and six branch libraries along with the Anaheim Heritage Center, Books on the Go! (self-service kiosk at Anaheim Regional Transportation Intermodal Center), and a mobile library (APL 2020).

The Central Library is the closest library to the Project Site. It is located at 500 W. Broadway, approximately 1.1 miles south of the Project Site. The Central Library is the largest library in the Anaheim Public Library system. The Anaheim Public Library system has 308,223 library card holders with 1.3 million annual visits in FY 18/19. Central Library has 106,266 card holders with 317,668 annual visits during FY18/19 which translates to 1,108 visitors per day at the Central Library alone. As discussed in Section 3.14, Population and Housing, the Proposed Project would add approximately 920 new residents to the City increasing the number of library users.

Population growth affects online resources because the basis for licensing fees for these databases, eBooks, and other digital resources are generally the population of the library's service area. With additional residents to serve, the Proposed Project would reduce the overall availability per capita of books, media, computers, and library public service space. Therefore, in order to maintain current per capita levels and licensing agreements, the City would need to provide additional physical and virtual resources to the Anaheim library system.

The threshold for determining impacts pursuant to CEQA is based upon whether the project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services. The impacts to the overall availability per capita of books, media, computers, and library public service space would not create significant physical or environmental impacts. Therefore, project-related impacts to library facilities would be less than significant and no mitigation measures are required.

3.16 RECREATION

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

Less Than Significant Impact. The City has 57 parks and recreation facilities totaling nearly 800 acres (Anaheim 2020c) and has a parkland standard of two acres per 1,000 residents (Anaheim 2004). Approximately 800 acres of parklands meet the standard to serve approximately 400,000 Anaheim residents. Anaheim's estimated 2020 population is 358,600 residents; therefore, the City is currently meeting its parkland standard. The nearest park from the Project Site is La Palma Park, at 1151 North Anaheim Boulevard, approximately 230 feet to the southwest, a 21-acre community park with amenities such as Glover Stadium, recreation center, group picnic shelter, open play area, barbeque facilities, dog park, etc. Julianna Park, a 0.5-acre special use park at 309 Julianna Avenue, is approximately 575 feet from the Project Site and provides a children's play area and group picnic shelter. Manzanita Park is approximately 0.4 miles to the northwest, a 7.5-acre park with children's play area, football/soccer field, outdoor basketball court, picnic area, restrooms, and youth center. In addition to City parks, regional parks in Orange County provide recreational opportunities for Anaheim residents.

Demands for park services increase with population growth, and the proposed 269 units would create additional demands for parks services. However, the Project Applicant would pay park in-lieu fees to provide offsite recreational facilities and the Proposed Project would provide onsite recreational facilities that exceeds the City's development standards.

AMC 17.34, Development Fees, requires the Project Applicant to "irrevocably offer to dedicate a portion of the land on which said unit or units are located and pay a fee for the development thereof, or pay a fee in lieu of dedication and the development fee for the purpose of providing park and recreational facilities to serve the future residents of the unit or units" prior to the issuance of a building permit for any dwelling units. The Quimby Act (CGC Section 66477) authorizes dedication of parkland and/or payment of in-lieu fees as a condition of approval of certain types of residential development projects. Furthermore, Assembly Bill 1359 allows cities and counties to use developer-paid Quimby Act fees to provide parks in neighborhoods other than the one in which the developer's subdivision is located. Therefore, although the Proposed Project would increase the demand for parks services, there are adequate parklands in the City, and the payment of required fees or dedication would allow the City to provide necessary improvements to reduce impacts to a less than significant level.

AMC 18.32.090, Recreational-Leisure Areas for the Mixed-Use Overlay Zone, requires 150 of recreational space for studio units and 200 square feet for all other units. Therefore, the Proposed Project with 49 studio units and 220 one- and two-bedroom units would require a total of 51,350 square feet of recreational areas. The Proposed Project includes recreational and open spaces totaling 52,790 square feet, including four courtyards with different themes, game space, two green spaces, club and fitness area, pool courtyard, paseo, and a roof deck, as shown in Figure 11, *Recreation and Open Space Plan*, to meet the park and recreational demands generated by the Proposed Project. The on-site recreational and open space areas exceed what is required under the City's development standard by 1,440 square feet.

Payment of parkland in-lieu fees and provision of onsite recreation and open space amenities would ensure that the Proposed Project does not result in substantial physical deterioration of the recreational facilities in the City. Impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. As discussed in section 3.16(a), the City would be able to serve the Proposed Project through its existing park and recreational facilities in the City. Therefore, the Proposed Project would not warrant the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

Further, the Proposed Project includes the development of a community pool, two pocket parks, and a dog park and trail along with private open space for residents in balconies, patios, and optional roof decks. These features of the Proposed Project would encourage residents at the Project Site to utilize on-site recreational amenities, and would offset potential demand on surrounding recreational facilities. The Proposed Project does not involve the construction of recreational facilities beyond what the Project Applicant has proposed on-site. Any potential environmental impacts caused by the Proposed Project's recreational facilities have been analyzed in this IS/MND. Therefore, no significant impacts would occur under the Proposed Project, and no mitigation measures are necessary.

3.17 TRANSPORTATION

Senate Bill 743

SB 743 was signed in 2013, with the intent to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions." When implemented, "traffic congestion shall not be considered a significant impact on the environment" within California Environmental Quality Act (CEQA) transportation analysis.

SB 743 requires the Governor's Office of Planning and Research (OPR) to identify new metrics for identifying and mitigating transportation impacts within CEQA. For land use projects, OPR identified Vehicle Miles Traveled (VMT) per capita, VMT per employee, and net VMT as new metrics for transportation analysis. For transportation projects, lead agencies for roadway capacity projects have discretion, consistent with CEQA and planning requirements, to choose which metric to use to evaluate transportation impacts.

Regulatory changes to the CEQA Guidelines that implement SB 743 were approved on December 28, 2018. July 1, 2020 was the statewide implementation date. OPR released a December 2018 Technical Advisory that contains recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures. Lead agencies were allowed to continue using their current impact criteria until June 30, 2020, or to opt into the revised transportation guidelines. In compliance with SB 743, the City of Anaheim City Council adopted the VMT Thresholds of Significance for purpose of analyzing transportation impacts and also approved the

3. Environmental Analysis

Traffic Impact Analysis Guidelines for California Environmental Quality Act Analysis (Guidelines) on June 30, 2020. All Traffic Impact Analysis for CEQA shall follow these guidelines.

Consistent with SB 743, the California Court of Appeal held that traffic impacts based on level of service (LOS) cannot be considered a significant impact on the environment under CEQA. In *Citizens for Positive Growth & Preservation v. City of Sacramento (2019)*, the Court stated that in enacting Public Resources Code section 21099, the Legislature directed that traffic analyses prepared to comply with CEQA move away from LOS to encourage infill development and focus CEQA's traffic analysis on potential traffic-related environmental impacts, rather than inconvenience associated with traffic congestion. Section 21099(b)(2) defines automobile delay as described solely by LOS as not "a significant impact on the environment pursuant to [CEQA] except in locations specifically identified in the guidelines". In 2018, the Secretary of the Natural Resources Agency promulgated and certified CEQA Guidelines Section 15064.3 to implement Public Resources Code section 21099(b)(2). Therefore, traffic impacts based on LOS cannot be considered a significant impact on the environment under CEQA.

It should be noted that the traffic study prepared for the Proposed Project was prepared prior to adoption the City's new Guidelines and adoption of a VMT Threshold. Therefore, the following LOS analysis is provided to show consistency with the City's adopted Circulation Element and is not used for determining significant impacts related to traffic under CEQA.

The basis for the LOS analysis in this section is in part from the following technical study, which is included as Appendix J to this Initial Study:

- The Invitation (formerly known as Renaissance Apartments), Transportation Impact Analysis, City of Anaheim. Urban Crossroads. July 2020.

3.17.1 Methodology

Urban Crossroads prepared a transportation impact analysis (TIA) for the Proposed Project in accordance with the City of Anaheim Criteria for Preparation of Traffic Impact Studies (TIA guidelines).

The TIA assumed that the Project Applicant would construct the Proposed Project within a single phase of development, and it would be fully built and operational by Year 2023.

3.17.1.1 TRAFFIC SCENARIOS

The TIA evaluated potential impacts to traffic and circulation for each of the following conditions:

- Existing (2019)
- Existing plus Project (E+P)
- Opening Year Cumulative (2023) Without Project
- Opening Year Cumulative (2023) With Project
- Long-Range Without Project
- Long-Range With Project

Existing (2019): The TIA evaluates the baseline traffic conditions, as they existed at the time of TIA preparation.

Existing plus Project (E+P). The TIA determines circulation system deficiencies that would occur on the existing roadway system in the scenario of the Proposed Project operating upon Existing conditions. The analysis intends E+P to identify the project-specific traffic impacts associated solely with the development of the Proposed Project based on a comparison of the E+P traffic conditions to Existing (2019) conditions

Opening Year Cumulative (2023). The TIA identifies the potential near-term cumulative circulation system deficiencies and evaluates if planned and funded improvements can accommodate the near-term cumulative traffic at the target level of service (LOS) identified by the City. To account for background traffic growth, traffic associated with other known cumulative development projects, in conjunction with an ambient growth from Existing (2019) conditions of 4.06 percent (1.0 percent per year over four years, compounded annually) is included. The City provided the information used to compile this list. The list is consistent with recent studies in the study area.

Long-Range With Project. Traffic projections for Long-Range With Project conditions were derived from the Anaheim Transportation Analysis Model (ATAM) regional traffic model, maintained by the City, using accepted procedures for model forecast refinement and smoothing. For the purpose of this analysis, the ATAM regional traffic model provided by City Staff, or the Anaheim Boulevard & La Palma Avenue (La Palma Village) Transportation Impact Analysis, were the bases for long-Range traffic forecasts. The Long-Range conditions analysis will be utilized to determine if planned and funded improvements can accommodate the long-range cumulative traffic at the target LOS identified by the City.

3.17.1.2 TRAFFIC STUDY AREA

In consultation with City staff, the TIA identified the following eight traffic study area intersections as listed in Table 18, *Traffic Study Area Intersections*. In general, the intersection locations within the traffic study area based on the City's 50-peak hour trip threshold to any surrounding intersections and/or are requested to be evaluated by City staff.

Congestion Management Program

The Orange County Congestion Management Program (CMP) requires that a TIA be conducted for any project generating 2,400 or more daily trips, or 1,600 or more daily trips for projects that directly access the CMP Highway System. The Proposed Project is forecast to generate approximately 1,140 daily trip-ends and based on a review of the CMP, there are no CMP facilities within the traffic study area. Therefore, the Proposed Project does not meet the criteria requiring a CMP traffic impact analysis.

3. Environmental Analysis

Table 18 Traffic Study Area Intersections

ID	Intersection Location	Jurisdiction	CMP?
1	Anaheim Bl. & SR-91 Westbound Ramps	Caltrans, Anaheim	No
2	Anaheim Bl. & SR-91 Eastbound Ramps	Caltrans, Anaheim	No
3	Anaheim Bl. & Commercial St.	Anaheim	No
4	Anaheim Bl. & Carl Karcher Wy.	Anaheim	No
5	Anaheim Bl. & Driveway 1	Anaheim	No
6	Anaheim Bl. & La Palma Pkwy.	Anaheim	No
7	Anaheim Bl./Lemon St. & La Palma Av.	Anaheim	No
8	Anaheim Bl. & La Palma Av.	Anaheim	No

3.17.1.3 LEVEL OF SERVICE

Traffic operations of roadway facilities are described using the term Level of Service (LOS). LOS is a qualitative description of traffic flow based on several factors such as speed, travel time, delay, and freedom to maneuver. Six levels are typically defined ranging from LOS A, representing completely free-flow conditions, to LOS F, representing breakdown in flow resulting in stop-and-go conditions. LOS E represents operations at or near capacity, an unstable level where vehicles are operating with the minimum spacing for maintaining uniform flow.

3.17.1.4 INTERSECTION CAPACITY ANALYSIS

The definitions of LOS for interrupted traffic flow (flow restrained by the existence of traffic signals and other traffic control devices) differ slightly depending on the type of traffic control. The LOS is typically dependent on the quality of traffic flow at the intersections along a roadway. The Highway Capacity Manual (HCM) (Latest Edition) methodology expresses the LOS at an intersection in terms of delay time for the various intersection approaches. The HCM uses different procedures depending on the type of intersection control. In comparison, the Intersection Capacity Utilization (ICU) methodology expresses the LOS at a signalized intersection in terms of volume-to-capacity ratio (v/c).

Signalized Intersections

The City requires signalized intersection operations analysis based on the methodology described in the ICU for signalized intersections and HCM for unsignalized intersections. Intersection LOS operations are based on an intersection's average control delay per the HCM methodology. Control delay includes initial deceleration delay, queue move-up time, stopped delay, and final acceleration delay. For signalized intersections evaluated using the HCM methodology, LOS is directly related to the average control delay per vehicle and is correlated to a LOS designation as described in Table 19, *Signalized Intersection LOS Threshold for HCM*. The ICU methodology is utilized at signalized intersections only and its description is provided in Table 20, *Signalized Intersection LOS Threshold for ICU*. A minimum clearance interval of 0.05 in association with lane capacities of 1,700 vehicles per hour of green time for through lanes and turn lanes were assumed for the ICU calculations.

Table 19 Signalized Intersection LOS Thresholds for HCM

LOS V/C ≤ 1.0	LOS V/C > 1.0	Average Control Delay (seconds), V/C ≤ 1.0	Level of Service Description
A	F	0 to 10.0	Operations with very low delay occurring with favorable progression and/or short cycle length.
B	F	10.01 to 20.00	Operations with low delay occurring with good progression and/or short cycle lengths.
C	F	20.01 to 35.00	Operations with average delays resulting from fair progression and/or longer cycle lengths. Individual cycle failures begin to appear.
D	F	35.01 to 55.00	Operations with longer delays due to a combination of unfavorable progression, long cycle lengths, or high V/C ratios. Many vehicles stop and individual cycle failures are noticeable.
E	F	55.01 to 80.00	Operations with high delay values indicating poor progression, long cycle lengths, and high V/C ratios. Individual cycle failures are frequent occurrences. This is considered to be the limit of acceptable delay.
F	F	80.01 and up	Operation with delays unacceptable to most drivers occurring due to over saturation, poor progression, or very long cycle lengths

HCM = Highway Capacity Manual 6, Chapter 19: Signalized Intersections.

Table 20 Signalized Intersection LOS Threshold for ICU

LOS	HCM Delay Value (sec/veh)	LOS Description
A	< 0.60	Little or no capacity deficiencies.
B	0.61–0.70	Short-term capacity deficiencies
C	0.71–0.80	Average capacity deficiencies.
D	0.81–0.90	Long-term capacity deficiencies.
E	0.91–1.00	Very high capacity deficiencies.
F	> 1.00	Extremely high capacity deficiencies, with intersection capacity exceeded.

County of Orange CMP, ICU Methodology

Unsignalized Intersections

The City requires the operations of unsignalized intersections be evaluated using the methodology described the HCM. The analysis bases the LOS on the weighted average control delay expressed in seconds per vehicle as shown in Table 21, *Unsignalized Intersection LOS Threshold*.

Table 21 Unsignalized Intersection LOS Threshold

LOS, V/C ≤ 1.0	LOS, V/C > 1.0	Average Control Delay per Vehicle (seconds)	LOS Description
A	F	0 to 10.0	Little or no delay
B	F	10.01 to 15.0	Short traffic delays
C	F	15.01 to 25.0	Average traffic delays
D	F	25.01 to 35.0	Long traffic delays
E	F	35.01 to 50.0	Very long traffic delays
F	F	> 50.0	Extreme traffic delays with intersection capacity exceeded.

HCM = Highway Capacity Manual

3. Environmental Analysis

The TIA adjusted the peak hour traffic volumes using a peak hour factor (PHF) to reflect peak 15 minute volumes, which produces a more detailed analysis as compared to analyzing vehicles per hour [3].

At two-way or side-street stop-controlled intersections, LOS is calculated for each controlled movement and for the left turn movement from the major street, as well as for the intersection as a whole. For approaches composed of a single lane, the TIA computed delay as the average of all movements in that lane. For all-way stop controlled intersections, the TIA computed LOS for the intersection as a whole.

3.17.1.5 TRAFFIC SIGNAL WARRANT ANALYSIS

The TIA used the signal warrant criteria presented in the latest edition of the Caltrans California Manual on Uniform Traffic Control Devices (CAMUTCD), for all study area intersections. The CAMUTCD indicates that a analysis should consider the installation of a traffic signal if the results meet one or more of the signal warrants. Specifically, the TIA utilizes the Peak Hour Volume based Warrant 3 as the appropriate representative traffic signal warrant analysis for existing study area intersections for all analysis scenarios.

The TIA assesses the potential need for new traffic signals at future intersections that do not currently exist based on future average daily traffic (ADT) volumes, using the Caltrans planning level ADT-based signal warrant analysis worksheets. The TIA performed traffic signal warrant analyses for all of the following unsignalized study area intersections:

- #4 Anaheim Boulevard & Carl Karcher Way
- #5 Anaheim Boulevard & Project Driveway – Future Intersection
- #6 Anaheim Boulevard & La Palma Parkway

It is important to note that a signal warrant defines the minimum condition under which an intersection might warrant the installation of a traffic signal. Meeting this condition does not require that traffic control signal be installed at a particular location, but rather, that other traffic factors and conditions be evaluated in order to determine whether the signal is truly justified. Signal warrants do not necessarily correlate with LOS. An intersection may satisfy a signal warrant condition and operate at or above acceptable LOS or operate below acceptable LOS and not meet a signal warrant.

3.17.1.6 FREEWAY OFF-RAMP QUEUING ANALYSIS

The study area for the TIA includes the freeway-to-arterial interchange of the SR-91 Freeway at Anaheim Boulevard off-ramps. Consistent with Caltrans requirements, the 95th percentile queuing of vehicles has been assessed at the off-ramps to determine potential queuing impacts at the freeway ramp intersections on Anaheim

[3] The PHF is the relationship between the peak 15-minute flow rate and the full hourly volume (e.g. PHF = [Hourly Volume] / [4 x Peak 15-minute Flow Rate]). The use of a 15-minute PHF produces a more detailed analysis as compared to analyzing vehicles per hour. Existing PHFs have been used for all analysis scenarios in the TIA. Per the HCM, PHF values over 0.95 often are indicative of high traffic volumes with capacity constraints on peak hour flows while lower PHF values are indicative of greater variability of flow during the peak hour. In an effort to conduct a conservative analysis, a minimum PHF of 0.92 has been utilized at all new traffic study area intersections that currently do not exist.

Boulevard. Specifically, the queuing analysis is utilized to identify any potential queuing and "spill back" onto the SR-91 Freeway mainline from the off-ramp.

3.17.1.7 MINIMUM LEVEL OF SERVICE (LOS)

City of Anaheim

Per City's Growth Management Element requirements, a volume/capacity (V/C) ratio of 0.90 (LOS D) shall be the lowest acceptable service level at intersections following implementation of mitigation measures. Mitigation measures sufficient to bring intersections and roadway segments to the acceptable service levels must be identified. In order to maintain LOS D at intersections, arterial highway links should be maintained at LOS C or better.

Caltrans

Based on recent guidance from Caltrans District 8, the LOS for operating State highway facilities is based on Measures of Effectiveness (MOE) identified in the Highway Capacity Manual (HCM). Caltrans endeavors to maintain a target LOS at the transition between LOS C and LOS D on State highway facilities; however, Caltrans acknowledges that this may not always be feasible and recommends that the lead agency consult with Caltrans to determine the appropriate target LOS. If an existing State highway facility is operating at less than this target LOS, the existing MOE should be maintained. In general, the region-wide goal for an acceptable LOS on all freeways, roadways segments, and intersections is D. For undeveloped or not densely developed locations, the goal may be to achieve LOS C.

3.17.1.8 THRESHOLDS OF SIGNIFICANCE

City of Anaheim

The TIA used the final V/C ratio to identify circulation system deficiencies. A transportation impact on an intersection would be deemed significant in accordance with Table 22, *City of Anaheim Threshold of Significance*. For purposes of this calculation, the "Final V/C Ratio" means the future V/C ratio at an intersection considering impacts with the Proposed Project, Ambient Growth and Related Projects without any recommended improvements.

Table 22 City of Anaheim Threshold of Significance

Level of Service	Final V/C Ratio	Project-Related Increase In V/C
C	> 0.700-0.800	Equal to or greater than 0.050
D	> 0.800-0.900	Equal to or greater than 0.030
E, F	> 0.900	Equal to or greater than 0.010

Caltrans Facilities

To determine that the addition of project traffic to the SHS freeway segments would result in a deficiency, both of the following must be found:

- The traffic study finds that the LOS of a segment will degrade from D or better to E or F.
- The traffic study finds that the project will exacerbate an already deficient condition by contributing 50 or more peak hour trips. A segment that is operating at or near capacity is deemed to be deficient.

3.17.2 Existing Conditions

3.17.2.1 CIRCULATION NETWORK

The roadway classifications and planned (ultimate) roadway cross-sections of the major roadways in the traffic study area as identified on the City of Anaheim's General Plan Circulation Element described below.

- **La Palma Avenue.** Primary Arterial – Roadways that provide for circulation within the City and to its adjacent communities. Primary arterials are typically six lane divided facilities with no parking or four-lane divided with left turn pockets and two parking lanes. The typical right-of-way width of a primary arterial is 106 feet.
- **Anaheim Boulevard/Lemon Street.** Secondary Arterial – Roadways that provide for circulation within the City. Secondary arterial facilities are four-lane roadways, with two parking lanes, that are undivided. These facilities have a typical right-of-way width of 90 feet.
- **Carl Karcher Way.** Collector Street – Roadways that distribute residential traffic from its point of origin to higher capacity facilities. They are typically two-lane undivided roadways with a 64-foot right of way width.

3.17.2.2 EXISTING (2019) TRAFFIC COUNTS

The basis for the intersection LOS analysis is the traffic volumes observed during the peak hour conditions using traffic count data collected in November 2019. The analysis includes the following peak hours:

- Weekday AM Peak Hour (peak hour between 7:00 AM and 9:00 AM)
- Weekday PM Peak Hour (peak hour between 4:00 PM and 6:00 PM)

The weekday AM and weekday PM peak hour count data is representative of typical weekday peak hour traffic conditions in the traffic study area (i.e., near-by schools were in session and operating on normal schedules, clear weather conditions, etc.). Construction activity of the future La Palma Village began in 2019 and is anticipated to continue into 2020. The construction activity removed the channelized yield on La Palma Avenue. As a result of the construction, only one westbound right turn lane was open for traffic.

In discussion with City staff, existing volumes from the La Palma Village TIA was utilized for the overlapping intersections and credit will be taken for the existing tow yard where the Project resides. A compounded growth rate of 1.0 percent per year for 5 years was applied to the intersection volumes.

3.17.2.3 EXISTING (2019) INTERSECTION OPERATIONS ANALYSIS

Table 23, *Intersection Analysis for Existing (2019) Conditions*, summarizes existing peak hour intersection operations analysis results based on the analysis methodologies presented in Section 3.17.1.4, *Intersection Capacity Analysis*. It indicates that the following intersection is currently operating at an unacceptable LOS during one or more peak hours under the Existing Conditions.

- Anaheim Bl. & Carl Karcher Wy. (#4) – LOS F AM and PM peak hours

Table 23 Intersection Analysis for Existing (2019) Conditions

ID	Intersections	Traffic Control	Delay (sec) ICU (V/C)[1]		Level of Service	
			AM	PM	AM	PM
1	Anaheim Bl. & SR-91 Westbound Ramps	TS				
	ICU Methodology		0.677	0.692	B	B
	HCM Methodology		16.4	16.0	B	B
2	Anaheim Bl. & SR-91 Eastbound Ramps	TS				
	ICU Methodology		0.532	0.554	A	A
	HCM Methodology		15.3	17.0	B	B
3	Anaheim Bl. & Commercial St.	TS	0.426	0.482	A	A
4	Anaheim Bl. & Carl Karcher Wy.	CSS	60.4	>100.0	F	F
5	Anaheim Bl. & Project Driveway 1 (future)		Future Intersection			
6	Anaheim Bl. & La Palma Pkwy.	CSS	12.2	15.7	B	C
7	Anaheim Bl./Lemon St. & La Palma Av.	TS	0.771	0.857	C	D
8	Anaheim Bl. & La Palma Av.	TS	0.515	0.633	A	B

TS = Traffic Signal; CSS = Cross-Street Stop

[1] Overall average intersection delay and level of service (HCM Methodology) are shown for intersections within the jurisdiction of Caltrans. Per City of Anaheim Criteria for Preparation of Traffic Impact Studies, all signalized intersections will be evaluated utilizing Intersection Capacity Utilization (ICU) methodology. For intersections with all way or cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown. HCM delay reported in seconds and ICU reported as a volume-to-capacity ratio.

3.17.2.4 EXISTING (2019) TRAFFIC SIGNAL WARRANTS ANALYSIS

Traffic signal warrants for Existing traffic conditions are based on existing peak hour intersection turning volumes. A traffic signal is warranted at the intersection of Anaheim Boulevard and Carl Karcher Way under Existing traffic conditions per Section 3.7 of the TIA.. Existing conditions traffic signal warrant analysis worksheets are provided in Appendix 3.3 of the Appendix J, TIA.

3.17.2.5 OFF-RAMP QUEUING ANALYSIS

A queuing analysis was performed for the off-ramp at the SR-91 Freeway at Anaheim Boulevard interchange to assess vehicle queues for the off ramp that may potentially result in deficient peak hour operations at the ramp-to-arterial intersections and may potentially "spill back" onto the SR-91 Freeway mainline. Queuing analysis findings are presented in Table 24. It is important to note that off-ramp lengths are consistent with the measured distance between the intersection and the freeway mainline. As shown on Table 25, there are no existing queuing issues. Worksheets for Existing traffic conditions off-ramp queuing analysis are provided in Appendix 3.4 of the TIA (contained in Appendix J).

Table 24 Peak Hour Freeway Off-Ramp Queuing Summary for Existing (2019) Conditions

Intersection	Movement	Available Stacking Distance (feet)	95th Percentile Queue (Feet)		Acceptable? [1]	
			AM Peak Hour	PM Peak Hour	AM	PM
Anaheim Bl & SR-91 Westbound Ramps	WBT	900	263	236	Yes	Yes
	WBR	500	386	428	Yes	Yes

[1] Stacking Distance is acceptable if the required stacking distance is less than or equal to the stacking distance provided. An additional 15 feet of stacking which is assumed to be provided in the transition for turn pockets is reflected in the stacking distance shown in this table, where applicable.

3.17.3 Project Trip Generation

Table 25, *Trip Generation Summary*, summarizes trip generation rates and resulting trips for the Proposed Project. The Proposed Project, as currently proposed, has six levels with residential uses on four levels. As such, multifamily housing (mid-rise) (Land Use Code 221) trip generation rates have been utilities for the analysis. The trip generation rates used are based upon the Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition, 2017. Credit was taken for the existing tow yard as discussed with City Staff. As shown on Table 26, 269 multifamily mid-rise units are anticipated to generate a net total of 1,140 weekday trip-ends per day with 80 AM peak hour trips and 87 PM peak hour trips.

Table 25 Trip Generation Summary

Land Use	Units	Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Project Trip Generation Rates[1]								
Multifamily Housing Mid-Rise	ITE Code: 221	5.44	0.09	0.27	0.36	0.27	0.17	0.44
Project Trip Generation Summary								
Multifamily Housing Mid-Rise	269 DU	1,464	25	72	97	72	46	118
Existing Towing Facility [2]	--	324	11	6	17	13	18	31
Total		1,140	14	66	80	59	28	87

DU = Dwelling Unit
[1] Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, 10th Edition (2017).
[2] Existing driveway counts were taken during typical weekday conditions on Thursday, March 12, 2020.

As a conservative approach, the potential for Project-related trips (non-truck) to be reduced by the use of public transit, walking, or bicycling have not been included as part of the Project's estimated trip generation, as these alternative travel modes would reduce the forecasted traffic volumes.

Project Trip Distribution and Trip Assignment

The Project trip distribution was developed based on anticipated travel patterns to and from the Project Site for both near-term and long-range traffic conditions. The assignment of traffic from the Project area to the adjoining roadway system is based upon the Project trip generation, trip distribution, and the arterial highway and local street system improvements that would be in place by the time of initial occupancy of the Proposed Project.

3.17.4 Future Traffic Conditions

3.17.4.1 OPENING YEAR (2023) CUMULATIVE CONDITIONS

Future year traffic forecasts are based on four years of background (ambient) growth at 1.0 percent per year for 2023 traffic conditions. The total ambient growth is 4.06 percent for 2023 traffic conditions (compounded growth of one percent per year over four years or 1.014 years), and this ambient growth rate is added to existing traffic volumes to account for area-wide growth not reflected by cumulative development projects.

A cumulative project list was developed through consultation with planning and engineering staff from the City. Exhibit 4-3, *Cumulative Developments Location Map*, and Table 4-2, *Cumulative Development Land Use Summary*, of the TIA (Appendix J to the Initial Study) illustrates 44 cumulative development project locations and a summary of their proposed land uses, respectively. Cumulative development projects are future development projects that have been approved but not yet built and/or for which development applications have been filed and are under consideration by governing agencies. If the cumulative development project was within 2 miles of the Project Site, the traffic generated by individual cumulative projects was manually added to the Opening Year Cumulative forecasts to ensure that traffic generated by the listed cumulative development projects are reflected as part of the background traffic.

The lane configurations and traffic controls assumed to be in place for Opening Year Cumulative (2023) conditions are consistent with those shown previously on Exhibit 3-1 of the TIA, with the exception of the following:

- Project driveways and those facilities assumed to be constructed by the Proposed Project to provide site access (e.g., intersection and roadway improvements at the Project's frontage and driveways).

- Driveways and those facilities assumed to be constructed by cumulative developments to provide site access (e.g., intersection and roadway improvements along the cumulative development's frontages, and improvements to the intersection of Anaheim Boulevard and La Palma Avenue).

The following summarizes the opening year cumulative conditions with and without the Proposed Project:

- Opening Year Cumulative (2023) Without Project
  - Existing 2019 volumes
  - Ambient growth traffic (4.06 percent)
  - Cumulative Development Traffic

- Opening Year Cumulative (2023) With Project
  - Existing 2019 volumes
  - Ambient growth traffic (4.06 percent)
  - Cumulative Development traffic
  - Project Traffic

3.17.4.2 LONG-RANGE VOLUME DEVELOPMENT

Traffic projections for Long-Range conditions were derived from the Anaheim Transportation Analysis Model (ATAM) and refined by the Urban Crossroads staff. The traffic forecasts reflect the area-wide growth anticipated between Existing (2019) conditions and Long-Range conditions. The volumes have been included in Appendix 4.1 of the TIA (contained in Appendix J). The buildout approach is used to forecast long-range traffic conditions and reflects City General Plan Buildout, as well as traffic resulting from growth of the area represented in regional plans.

The lane configurations and traffic controls assumed to be in place for Long-Range conditions are consistent with those shown previously on Exhibit 3-1 of the TIA, with the exception of the following:

- Project driveway and those facilities assumed to be constructed by the Proposed Project to provide site access (e.g., intersection and roadway improvements at the Project's frontage and driveways).
- Driveways and those facilities assumed to be constructed by cumulative development projects to provide site access (e.g., intersection and roadway improvements along the cumulative development's frontages, and improvements to the intersection of Anaheim Boulevard and La Palma Avenue).
- 3rd eastbound through lane at the intersection of Anaheim Boulevard and La Palma Avenue, consistent with the General Plan Buildout planned (ultimate) roadway width.

The long-range traffic analysis includes the following traffic conditions:

- Long-Range Without Project
  - Refined ATAM traffic forecasts
- Long-Range With Project
  - Refined ATAM traffic forecasts
  - Project Traffic

Would the project:

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

Less Than Significant Impact.

Existing Plus Project Traffic Conditions Analysis (E + P)

Intersection Operations Analysis

As summarized in Table 26, *Intersection Analysis for E + P Conditions*, no additional traffic study area intersections are anticipated to operate at unacceptable LOS, consistent with Existing (2019) traffic conditions. Although the intersection of Anaheim Boulevard and Driveway 1 is deficient, the deficiency exists for the left turn movement out of the Project Site. At the direction of City staff, average delay at this location is acceptable and no

additional mitigation is required. The deficiency occurs entirely on-site and will not affect the traffic operations along Anaheim Boulevard. Vehicles exiting the Project Site may use the existing two-way left turn lane on Anaheim Boulevard. The intersection operates at an acceptable LOS when utilizing Synchro (Version 10) and HCM 6th Edition methodology. As such, the deficiency is less-than-significant.

Table 26 Intersection Analysis for E + P Conditions

ID	Intersections	Traffic Control	Existing (2019) Delay (sec) ICU (V/C)[1] – LOS AM	Existing (2019) Delay (sec) ICU (V/C)[1] – LOS PM	E + P Delay (sec) ICU (V/C)[1] – LOS AM	E + P Delay (sec) ICU (V/C)[1] – LOS PM	ICU Variance (V/C) AM	ICU Variance (V/C) PM	Impact?
1	Anaheim Bl. & SR-91 WB Ramps	TS							
	ICU Methodology		0.677 – B	0.692 – B	0.684 – B	0.696 – B	0.007	0.004	No
	HCM Methodology		16.4 – B	16.0 – B	16.8 – B	16.2 – B	--	--	No
2	Anaheim Bl. & SR-91 EB Ramps	TS							
	ICU Methodology		0.532 – A	0.554 – A	0.533 – A	0.557 – A	0.001	0.003	No
	HCM Methodology		15.3 – B	17.0 – B	15.5 – B	17.0 – B	--	--	No
3	Anaheim Bl. & Commercial St.	TS	0.426 – A	0.482 – A	0.434 – A	0.485 – A	0.008	0.003	No
4	Anaheim Bl. & Carl Karcher Wy.	CSS	60.4 – F	>100.0 – F	68.6 – F	>100.0 – F	--	--	Yes
5	Anaheim Bl. & Project Driveway	CSS[2]	Future Intersection		28.5 – D	65.3– F	--	--	No[3]
6	Anaheim Bl. & La Palma Pkwy.	CSS	12.2 – B	15.7 – C	12.4 – B	16.0– C	--	--	No
7	Anaheim Bl./Lemon St. & La Palma Av.	TS	0.771 – C	0.857 – D	0.782 – C	0.879 – D	0.011	0.022	No
8	Anaheim Bl. & La Palma Av.	TS	0.515 – A	0.633 – B	0.521 – A	0.640 – B	0.006	0.007	No

BOLD = LOS does not meet the applicable jurisdictional requirements (i.e. unacceptable LOS).
TS = Traffic Signal; CSS = Cross-Street Stop

[1] Overall average intersection delay and level of service (HCM Methodology) are shown for intersections within the jurisdiction of Caltrans. Per City of Anaheim Criteria for Preparation of Traffic Impact Studies, all signalized intersections will be evaluated utilizing Intersection Capacity Utilization (ICU) methodology. For intersections with all way or cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown. HCM delay reported in seconds and ICU reported as a volume-to-capacity ratio.

[2] CSS = improvement

[3] Although the intersection is deficient, the deficiency exists for the left turn movement out of the site. The deficiency occurs entirely on-site and will not affect the traffic operations along Anaheim Boulevard. The intersection operates at an acceptable LOS when utilizing Synchro (Version 10) and HCM 6th Edition methodology. As such, the deficiency is less-than-significant.

Traffic Signal Warrants Analysis

Per Section 5.4 of the TIA, there are no additional intersections that are anticipated to warrant a traffic signal under Existing + Project traffic conditions.. Detail worksheets are included in Appendix J to this Initial Study.

Off-Ramp Queuing Analysis

A queuing analysis was performed for the off-ramp at the SR-91 Freeway at Anaheim Boulevard interchange to assess vehicle queues for the off ramp that may potentially result in deficient peak hour operations at the ramp-to-arterial intersections and may potentially "spill back" onto the SR-91 Freeway mainline. Queuing analysis findings are presented in Table 27. It is important to note that off-ramp lengths are consistent with the measured distance between the intersection and the freeway mainline. As shown on Table 28, there are no queuing issues anticipated for E+P traffic conditions. Worksheets for E+P traffic conditions off-ramp queuing analysis are provided in Appendix 5.3 of the TIA.

3. Environmental Analysis

Table 27 Peak Hour Freeway Off-Ramp Queuing Summary for E+P Conditions

Intersection	Movement	Available Stacking Distance (feet)	95th Percentile Queue (Feet)		Acceptable? [1]	
			AM Peak Hour	PM Peak Hour	AM	PM
Anaheim Bl & SR-91 Westbound Ramps	WBT	900	264	241	Yes	Yes
	WBR	500	388	428	Yes	Yes

[1] Stacking Distance is acceptable if the required stacking distance is less than or equal to the stacking distance provided. An additional 15 feet of stacking which is assumed to be provided in the transition for turn pockets is reflected in the stacking distance shown in this table, where applicable.

Opening Year Cumulative (2023) Without Project Conditions

Intersection Operations Analysis

As summarized in Table 28, *Intersection Analysis for Opening Year Cumulative (2023) With and Without Project*, no additional traffic study area intersections are anticipated to operate at unacceptable LOS, consistent with Existing (2019) traffic conditions.

Table 28 Intersection Analysis for Opening Year (2023) Cumulative With and Without Project

ID	Intersections	Traffic Control	2023 Without Project Delay (sec) ICU (V/C)[1] – LOS		2023 With Project Delay (sec) ICU (V/C)[1] – LOS		ICU Variance (V/C)		Impact?
			AM	PM	AM	PM	AM	PM	
1	Anaheim Bl. & SR-91 WB Ramps	TS							
	ICU Methodology		0.707 – C	0.721 – C	0.714 – C	0.724 – C	0.007	0.003	No
	HCM Methodology		17.6 – B	17.0 – B	18.0 – B	17.3 – B	--	--	No
2	Anaheim Bl. & SR-91 EB Ramps	TS							
	ICU Methodology		0.552 – A	0.576 – A	0.553 – A	0.579 – A	0.001	0.003	No
	HCM Methodology		16.0 – B	17.9 – B	16.2 – B	18.0 – B	--	--	No
3	Anaheim Bl. & Commercial St.	TS	0.445 – A	0.501 – A	0.454 – A	0.505 – A	0.009	0.004	No
4	Anaheim Bl. & Carl Karcher Wy.	CSS	99.3 – F	>100.0 – F	>100.0 – F	>100.0 – F	--	--	Yes
5	Anaheim Bl. & Project Driveway	CSS[2]	Future Intersection		33.1 – D	81.8 – F	--	--	No[4]
6	Anaheim Bl. & La Palma Pkwy.	CSS	12.5 – B	16.4 – C	12.7 – B	16.7 – C	--	--	No
7	Anaheim Bl./Lemon St. & La Palma Av.	TS[3]	0.706 – C	0.784 – C	0.714 – C	0.793 – C	0.008	0.009	No
8	Anaheim Bl. & La Palma Av.	TS	0.538 – A	0.660 – B	0.543 – A	0.666 – B	0.005	0.006	No

TS = Traffic Signal; CSS = Cross-Street Stop

[1] Overall average intersection delay and level of service (HCM Methodology) are shown for intersections within the jurisdiction of Caltrans. Per City of Anaheim Criteria for Preparation of Traffic Impact Studies, all signalized intersections will be evaluated utilizing Intersection Capacity Utilization (ICU) methodology. For intersections with all way or cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown. HCM delay reported in seconds and ICU reported as a volume-to-capacity ratio.

[2] CSS = Improvement

[3] The intersection analysis includes the construction of the 2nd westbound right turn lane improvement from the La Palma Village project.

[4] Although the intersection is deficient, the deficiency exists for the left turn movement out of the site. The deficiency occurs entirely on-site and will not affect the traffic operations along Anaheim Boulevard. The intersection operates at an acceptable LOS when utilizing Synchro (Version 10) and HCM 6th Edition Methodology. As such, the deficiency is less-than-significant.

Traffic Signal Warrants Analysis

Per Section 6.5 of the TIA, there are no additional intersections that are anticipated to warrant a traffic signal under Opening Year Cumulative (2023) Without Project traffic conditions. Detail worksheets are included in Appendix J to this Initial Study.

Opening Year Cumulative (2023) With Project Conditions

Intersection Operations Analysis

As summarized in Table 28, *Intersection Analysis for Opening Year Cumulative (2023) Conditions With and Without Project*, no additional traffic study area intersections that are anticipated to experience unacceptable LOS with the addition of Project traffic during one or more peak hours. Although the intersection of Anaheim Boulevard and Project Driveway is deficient, the deficiency exists for the left turn movement out of the Project Site. At the direction of City staff, average delay at this location is acceptable and no additional mitigation is required. The deficiency occurs entirely on-site and will not affect the traffic operations along Anaheim Boulevard. Vehicles exiting the Project Site may use the existing two-way left turn lane on Anaheim Boulevard. The intersection operates at an acceptable LOS when utilizing Synchro (Version 10) and HCM 6th Edition methodology. As such, the deficiency is less-than-significant. Detail worksheets are included in Appendix J to this Initial Study.

Traffic Signal Warrants Analysis

Per Section 6.5 of the TIA, there are no additional intersections that are anticipated to warrant a traffic signal under Opening Year Cumulative (2023) With Project traffic conditions. Detail worksheets are included in Appendix J to this Initial Study.

Off-Ramp Queuing Analysis

A queuing analysis was performed for the off-ramp at the SR-91 Freeway at Anaheim Boulevard interchange to assess vehicle queues for the off ramp that may potentially result in deficient peak hour operations at the ramp-to-arterial intersections and may potentially "spill back" onto the SR-91 Freeway mainline. Queuing analysis findings are presented in Table 30. It is important to note that off-ramp lengths are consistent with the measured distance between the intersection and the freeway mainline. As shown on Table 29, there are no queuing issues anticipated for Opening Year Cumulative (2023) Without and With Project traffic conditions. Worksheets for Opening Year Cumulative (2023) Without and With Project traffic conditions off-ramp queuing analysis are provided in Appendix J to this Initial Study.

Table 29 Peak Hour Freeway Off-Ramp Queuing Summary for Opening Year Cumulative (2023) Conditions

			2023 Without Project				2023 With Project			
			95th Percentile Queue (Feet)		Acceptable? [1]		95th Percentile Queue (Feet)		Acceptable? [1]	
Intersection	Movement	Available Stacking Distance (feet)	AM Peak Hour	PM Peak Hour	AM	PM	AM Peak Hour	PM Peak Hour	AM	PM
Anaheim Bl & SR-91 Westbound Ramps	WBT	900	277	248	Yes	Yes	278	253	Yes	Yes
	WBR	500	425	464	Yes	Yes	428	465	Yes	Yes

[1] Stacking Distance is acceptable if the required stacking distance is less than or equal to the stacking distance provided. An additional 15 feet of stacking which is assumed to be provided in the transition for turn pockets is reflected in the stacking distance shown in this table, where applicable.

3. Environmental Analysis

Long-Range Without Project Conditions

Intersection Operations Analysis

As shown in Table 30, no additional study area intersections are anticipated to operate at an unacceptable LOS, consistent with Existing (2019) traffic conditions.

Table 30 Intersection Analysis for Long-Range With and Without Project

ID	Intersections	Traffic Control	Without Project Delay (sec) ICU (V/C)[1] – LOS AM	Without Project Delay (sec) ICU (V/C)[1] – LOS PM	With Project Delay (sec) ICU (V/C)[1] – LOS AM	With Project Delay (sec) ICU (V/C)[1] – LOS PM	ICU Variance (V/C) AM	ICU Variance (V/C) PM	Impact?
1	Anaheim Bl. & SR-91 WB Ramps	TS							
	ICU Methodology		0.734 – C	0.777 – C	0.740 – C	0.781 – C	0.006	0.004	No
	HCM Methodology		20.2 – C	19.0 – B	20.8 – C	19.3 – B	--	--	No
2	Anaheim Bl. & SR-91 EB Ramps	TS							
	ICU Methodology		0.625 – B	0.771 – C	0.631 – B	0.773 – C	0.006	0.002	No
	HCM Methodology		23.3 – C	32.3 – C	23.8 – C	32.4 – C	--	--	No
3	Anaheim Bl. & Commercial St.	TS	0.445 – A	0.655 – B	0.452 – A	0.658 – B	0.007	0.003	No
4	Anaheim Bl. & Carl Karcher Wy.	CSS	48.1 – E	>100.0 – F	52.9 – F	>100.0 – F	--	--	Yes
5	Anaheim Bl. & Project Driveway	CSS[2]	Future Intersection		41.1 – E	95.7 – F	--	--	No[4]
6	Anaheim Bl. & La Palma Pkwy.	CSS	13.1 – B	16.3 – C	13.4 – B	16.6 – C	--	--	No
7	Anaheim Bl./Lemon St. & La Palma Av.	TS[3]	0.709 – C	0.829 – D	0.717 – C	0.837 – D	0.008	0.008	No
8	Anaheim Bl. & La Palma Av.	TS	0.740 – C	0.825 – D	0.745 – C	0.830 – D	0.005	0.005	No

TS = Traffic Signal; CSS = Cross-Street Stop

1 Overall average intersection delay and level of service (HCM Methodology) are shown for intersections within the jurisdiction of Caltrans. Per City of Anaheim Criteria for Preparation of Traffic Impact Studies, all signalized intersections will be evaluated utilizing Intersection Capacity Utilization (ICU) methodology. For intersections with all way or cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown. HCM delay reported in seconds and ICU reported as a volume-to-capacity ratio.

2 CSS = Improvement

3 The intersection analysis includes the construction of the 2nd westbound right turn lane improvement from the La Palma Village project.

4 Although the intersection is deficient, the deficiency exists for the left turn movement out of the site. The deficiency occurs entirely on-site and will not affect the traffic operations along Anaheim Boulevard. The intersection operates at an acceptable LOS when utilizing Synchro (Version 10) and HCM 6th Edition methodology. As such, the deficiency is less-than-significant.

Traffic Signal Warrants Analysis

Per Section 7.5 of the TIA, there are no additional intersections that are anticipated to warrant a traffic signal under Long Range Without Project traffic conditions. Detail worksheets are included in Appendix J to this Initial Study.

Long-Range With Project Conditions

Intersection Operations Analysis

As shown on Table 31 and illustrated on Exhibit 7-4 of the TIA (contained in Appendix J to the initial Study), there are no additional study area intersections anticipated to experience unacceptable LOS under Long-Range With Project traffic conditions. The intersection analysis results are summarized in Table 31, which indicates that no additional study area intersections are anticipated to operate at unacceptable LOS, consistent with Existing (2019) traffic conditions. Although the intersection of Anaheim Boulevard and Driveway 1 is deficient, the deficiency exists for the left turn movement out of the site. At the direction of City staff, average delay at

this location is acceptable and no additional mitigation is required. The deficiency occurs entirely on-site and will not affect the traffic operations along Anaheim Boulevard. Vehicles exiting the Project Site may use the existing two-way left turn lane on Anaheim Boulevard. The intersection operates at an acceptable LOS when utilizing Synchro (Version 10) and HCM 6th Edition methodology. As such, the deficiency is less-than-significant.

Traffic Signal Warrants Analysis

Per Section 7.5 of the TIA, there are no additional intersections that are anticipated to warrant a traffic signal under Long Range With Project traffic conditions. Detail worksheets are included in Appendix J to this Initial Study.

Off-Ramp Queuing Analysis

A queuing analysis was performed for the off-ramp at the SR-91 Freeway at Anaheim Boulevard interchange to assess vehicle queues for the off ramp that may potentially result in deficient peak hour operations at the ramp-to-arterial intersections and may potentially "spill back" onto the SR-91 Freeway mainline. Queuing analysis findings are presented in Table 32. It is important to note that off-ramp lengths are consistent with the measured distance between the intersection and the freeway mainline. As shown on Table 31, there are no queuing issues anticipated for Long-Range Without and With Project traffic conditions. Worksheets for Long-Range Without and With Project traffic conditions off-ramp queuing analysis are provided in the Appendix.

Table 31 Peak Hour Freeway Off-Ramp Queuing Summary for Long-Range Conditions

			Without Project				With Project			
			95th Percentile Queue (Feet)		Acceptable? [1]		95th Percentile Queue (Feet)		Acceptable? [1]	
Intersection	Movement	Available Stacking Distance (feet)	AM Peak Hour	PM Peak Hour	AM	PM	AM Peak Hour	PM Peak Hour	AM	PM
Anaheim Bl & SR-91 Westbound Ramps	WBT	900	230	206	Yes	Yes	231	210	Yes	Yes
	WBR	500	403	567 [2]	Yes	Yes [3]	406	567 [2]	Yes	Yes [3]

[1] Stacking Distance is acceptable if the required stacking distance is less than or equal to the stacking distance provided. An additional 15 feet of stacking which is assumed to be provided in the transition for turn pockets is reflected in the stacking distance shown in this table, where applicable.
[2] 95th percentile volume exceeds capacity, queue may be longer. Queue shown is maximum after two cycles.
[3] Although the 95th percentile queue is anticipated to exceed the available storage for the turn lane, the adjacent through lane has sufficient storage to accommodate any spillover without spilling back and affecting the SR-91 Freeway mainline.

Conclusion

The Proposed Project is anticipated to generate a net total of 1,140 weekday trip-ends per day with 80 AM peak hour trips and 87 PM peak hour trips. Due to construction of La Palma Village, only one westbound right turn lane at the intersection of Anaheim Boulevard/Lemon Street & La Palma Avenue was open to traffic. La Palma Avenue is currently under construction with two westbound right turn lanes as part of the La Palma Village project.

3. Environmental Analysis

For Existing (2019), Opening Year Cumulative (2023) Without Project, and Long-Range Without Project traffic conditions, the intersection of Anaheim Boulevard and Carl Karcher Way is identified to operate at an unacceptable LOS.

Recommended Improvement

Based on the significance criteria discussed in Section 3.17.1.8, *Thresholds of Significance*, the following intersection was found to be impacted by the Proposed Project for Existing Plus Project, Opening Year Cumulative With Project, Long-Range With Project traffic conditions:

- #4 Anaheim Boulevard/Carl Karcher Way.

The TIA determined that improving Intersection #4, Anaheim Boulevard/Cark Karcher Way, with a traffic signal would reduce impacts to a level below the threshold of significance.

The Proposed Project would exceed the City's established threshold of significance and result in a traffic impact. However, in the December 2019 court case; Citizens for Positive Growth & Preservation v. City of Sacramento, 2019, Cal.App.5th, ruled that pursuant to Senate Bill 743 and Public Resources Code Section 21099, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment under CEQA. Therefore, the Proposed Project's traffic congestion impacts to area roadways is not a significant impact to the environment. Therefore, this LOS impact is not considered a significant environmental impact, and a mitigation measure is not warranted. However, the staff determined that while not a significant transportation impact on the environment, it would be a planning consistency impact as discussed in Section 3.11 *Land Use and Planning*, as the Proposed Project would result in exceedance of LOS threshold established by the City's Circulation Element. A less than significant transportation impact would occur, and no mitigation measures are required. However, as discussed in Section 3.11 *Land Use and Planning*, payment of fair share fees would be required as a condition of approval to fund the necessary roadway improvements on Anaheim Boulevard/Carl Karcher Way intersection to reduce the LOS impact to be consistent with the City's Circulation Element. Prior to issuance of building permits, the property owner/developer shall pay the project's equitable fair share of the traffic signal improvements at the intersections of Anaheim Boulevard and Carl Karcher Way. The project's fair share cost shall be based off the project's fair share percentage estimated in the project TIA (Invitation Apartments TIA prepared by Urban Crossroads July 2020 or any updates thereafter as approved by the City of Anaheim) and the total improvement costs. Per the City's TIA guidelines, once the project's equitable fair share is determined in the TIA, the owner/developer shall determine and develop cost estimates of the right-of-way and construction costs of improvements needed at Project Opening Year, and submit to the City for review and approval.

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

Less Than Significant Impact. As stated in the above subheading under Senate Bill 743, the California Natural Resources Agency adopted revised CEQA Guidelines on December 28, 2018. Among the changes to the guidelines was the removal of vehicle delay and LOS from consideration for transportation impacts under CEQA. With the adopted guidelines, transportation impacts were to be evaluated based on a project's effect on VMT. Lead agencies were allowed to continue using their current impact criteria until June 30, 2020, or to opt

into the revised transportation guidelines. On June 23, 2020, the City of Anaheim City Council adopted the VMT Thresholds of Significance for purpose of analyzing transportation impacts and also approved the Traffic Impact Analysis Guidelines for California Environmental Quality Act Analysis (Guidelines).

Based on the City Guidelines, the Proposed Project's proximity to high quality transit is one of the screening thresholds that could be used for determining if a VMT analysis is required. CEQA Section 15064.3, subdivision (b)(1) states that lead agencies should generally presume that certain projects, including residential, will have a less than significant impact on VMT within one half mile of a fixed stop along a high-quality transit corridor. The Public Resources Code 21155 defines a high-quality transit corridor as a fixed route bus corridor with headways of 15 minutes or less during peak commute hours. The City Guidelines states that this presumption would not apply if any of the following is true:

- Has a Floor Area Ratio (FAR) of less than 0.75
- Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction
- Is inconsistent with the applicable Sustainable Communities Strategy (SCS) (as determined by the lead agency, with input from the Metropolitan Planning Organization)

The Proposed Project is located immediately adjacent to bus stops on Anaheim Boulevard and less than ½ mile from bus stops on La Palma Avenue. The peak hour headways for buses on both streets are 15 minutes or less. The proposed project's dwelling units will total over 230,000 square feet on a 195,584 square foot site, so the FAR will exceed 0.75. The Proposed Project meets, but does not exceed the parking required by the City. Additionally, the Project is consistent with the applicable SCS as the Project's land use is consistent with the City's General Plan land use designation. Therefore, the Project could be screened from a VMT analysis, and would be considered a less than significant impact on VMT, per the City of Anaheim TIA Guidelines for CEQA Analysis.

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

Less Than Significant Impact. The Project Site would be accesses only via one driveway on Anaheim Boulevard. Both ingress and egress would occur from this driveway, and full left and right turns out to Anaheim Boulevard would be permitted. The Project Driveway intersection (ID#5) is forecast to operate at LOS F during the PM peak hours under Existing Plus Project, Opening Year Cumulative (2023), and Long-Range traffic conditions and at LOS E during the Long Range AM peak hour traffic condition. During the AM peak hours under Existing Plus Project and Opening Year Cumulative (2023) the intersection would operate at LOS D. The traffic study finds that although the intersection is deficient, the deficiency exists for the left turn movement out of the site. The deficiency occurs entirely on-site and will not affect the traffic operations along Anaheim Boulevard. The intersection operates at an acceptable LOS when utilizing Synchro (Version 10) and HCM 6th Edition methodology. The Traffic Study determined that the deficiency is less-than-significant.

3. Environmental Analysis

The Proposed Project includes street improvement on Anaheim Boulevard and the Project Driveway intersection, including, but not limited to the striping, signage, and line of sight features. The street improvement plan would be reviewed and approved by the Traffic Engineering Division of the City of Anaheim Public Works Department in accordance with the City's standards. The Project Site does not have curved street frontage or slopes that could increase hazards due to design feature and the proposed residential uses would be compatible with the approved La Palma Village to the south and no safety hazards would be created. The Proposed Project does not include any unique uses or structures that may create safety hazards. Impacts would not be significant, and no mitigation measures are required.

d) Result in inadequate emergency access?

Less Than Significant Impact With Mitigation Incorporated. Construction-related activities could adversely impact emergency access in adjacent roadways. Construction-related trips involve construction worker trips, large trucks hauling soil and debris from the Project Site, trucks delivering construction equipment to/from the Project Site, and large trucks delivering concrete and other construction materials. These trips could potentially interfere with area traffic during emergencies.

Therefore, mitigation is necessary to ensure that construction staging and traffic control plans are prepared and implemented. These plans will indicate on- or off-site construction staging area, any potential for full or partial lane closures, hours during which lane closures (if any) would not be allowed, local traffic detours (if any), and protective devices and traffic controls (such as barricades, cones, flag persons, lights, warning beacons, temporary traffic signals, warning signs). The plans will also indicate any allowed street closures. Provided that site-specific construction worksite staging and traffic control plans are approved and implemented, the Proposed Project would not adversely impact or physically interfere with an adopted emergency responder or evacuation plan. Additionally, construction would be temporary, approximately two and a half years, and only between the hours of 7:00 AM and 7:00 PM, from Monday through Saturday. The Proposed Project would not have construction activities during Sundays or federally recognized holidays, pursuant to the City's Noise Ordinance.

One driveway on Anaheim Boulevard would provide vehicular access, and internal circulation for emergency vehicles would be accessible via a gated 26-footwide evacuation lane, beyond the parking structure access. Anaheim Fire and Rescue would review and implement the internal circulation, under City standards. In addition, the Proposed Project would not result in significant traffic impacts to any of the area intersections or roadway segments during operation. Therefore, surrounding roadways would continue to offer emergency access to the Project Site and surrounding properties after construction.

Mitigation Measure

TRAN-1 Prior to any construction work, the Project Applicant shall prepare a site-specific construction worksite staging and traffic control plan and submit it to the Traffic Engineering Division of the City of Anaheim Public Works Department for review and approval. This plan shall include such elements as the location of any potential partial lane closures, hours during which lane closures (if any) would not be allowed; local traffic detours (if any); and protective devices and traffic controls, such as barricades, cones, flag persons, lights, warning beacons, temporary

traffic signals, and warning signs. It shall indicate that lane closures are permitted on Anaheim Boulevard during construction between 8:30 AM and 3:30 PM, Mondays through Fridays. The Proposed Project will be required to comply with the City-approved plan measures.

3.18 TRIBAL CULTURAL RESOURCES

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

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

Less Than Significant Impact. The Project Site has been previously developed and disturbed, and the Project Site is not eligible or listed in the California Register of Historical Resources or local register of historical resources (Public Resources Code § 21074) (OHP 2020). Implementation of the Proposed Project would not result in any substantial adverse change in a tribal cultural resource (TCR) defined pursuant to PRC 5024.1 or PRC 5020.1(k). Impacts would be less than significant. No mitigation measures are required.

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

Less Than Significant Impact With Mitigation Incorporated. As stated in Section 3.18 (a)(i), there are no known TCRs within the boundaries of the Project Site. The Project Site has been previously developed and disturbed and does not meet any of the historical resources criteria outlined in PRC 2024.1.

In considering the significance of the resource to a California Native American tribe, the City contacted the Native American Heritage Commission (NAHC) for the listing of tribes with traditional lands or cultural places located within the boundaries of the Project Site. In addition, the City asked the NAHC to search the Sacred Lands File. The search result was negative. The City contacted the tribes on the NAHC's list, and only one tribal representative responded—Andrew Salas of the Gabrieleño Band of Mission Indians - Kizh Nation. The City consulted with the Gabrieleño Band of Mission Indians - Kizh Nation on April 14, 2020 via email correspondence and the consultation was deemed complete on April 15, 2020.

The Gabrieleño Band of Mission Indians - Kizh Nation considers the Project Site to be within its ancestral tribal territory, descending from a higher degree of kinship than traditional or cultural affiliation. They also indicated that the Project Site is in a sensitive area and may cause a substantial adverse change in the significance of their TCRs. As part of consultation, they provided links to three website articles reporting that some of the major Native American trails became modern day roadways, suggesting that the Project

Area could be near one of those trails and therefore has potential to yield TCRs. For this reason, they recommended that a tribal monitor(s) be present during ground-disturbing activities. If the Project Applicant discovers human remains determined to be Native American, the coroner will notify the NAHC—as mandated by state law—who will then appoint a most likely descendent. The Gabrieleño Band of Mission Indians - Kizh Nation indicated that to the tribe, the term "human remains" encompasses more than human bones, but also the burial of funerary objects with the deceased, and the ceremonial burning of human remains. Consistent with Mitigation Measure TCR-1 below, these remains are to be treated in the same manner as human bones that remain intact. Associated funerary objects are objects that are reasonably believed to have been placed with individual human remains at the time of death, or later as part of the death rite or ceremony of a culture. Other items made exclusively for burial purposes or to contain human remains can also be considered associated funerary objects. Because there is a possibility that grading and excavation activities during implementation of the Proposed Project could affect previously undisturbed TCRs, Mitigation Measure TCR-1 has been incorporated to reduce this potential impact to a less than significant level.

Mitigation Measure

TCR-1 Prior to the issuance of grading permits, the Project Applicant shall retain a Native American monitor/consultant and submit a copy of the executed contract to the City of Anaheim Planning and Building Department. The tribal monitor/consultant will only be present on-site during the construction phases that involve ground-disturbing activities. Ground-disturbing activities are defined by the Gabrieleño Band of Mission Indians - Kizh Nation as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching within the project area. The tribal monitor/consultant will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the Project Site grading and excavation activities are completed, or when the tribal representatives and monitor/consultant have indicated that the Project Site has a low potential for affecting tribal cultural resources.

Upon discovery of any archaeological resources, construction activities shall cease in the immediate vicinity of the find until a qualified archaeologist and/or tribal monitor/consultant can assess the find. The evaluation of all archaeological resources unearthed by project construction activities shall be evaluated by the qualified archaeologist and tribal monitor/consultant approved by the Gabrieleño Band of Mission Indians - Kizh Nation. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians - Kizh Nation shall coordinate with the Project Applicant regarding treatment and curation of these resources. Typically, the tribe will request reburial or preservation for educational purposes. The Project Applicant may continue work on other parts of the Project Site while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5[f]). If a qualified archaeologist determines a resource to constitute a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures or appropriate mitigation must be available. The treatment plan

established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and PRC Section 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. The Project Applicant shall be responsible for ensuring that a public, nonprofit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material, curate any historic archaeological material that is not Native American in origin. If no institution accepts the archaeological material, the Project Applicant shall offer it to a local school or historical society in the area for educational purposes.

3.19 UTILITIES AND SERVICE SYSTEMS

The basis for the analysis in this section is partly from the following technical studies:

- *Technical Memorandum: Sewer Study – Renaissance Apartments, 1122 N. Anaheim Blvd (OTH2019-01191),* September 9, 2019. (Appendix K)
- *Solid Waste Management Plan, The Renaissance, 1122 Anaheim Boulevard,* December 20, 2019. (Appendix L)

Would the project:

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

Less Than Significant Impact. Following is a discussion of the Proposed Project's potential impacts on water and wastewater treatment, stormwater drainage, electric power, natural gas, and telecommunications facilities.

Water Supply Facilities

Pursuant to California Water Code Sections 10610 through 10657 (Urban Water Management Planning Act), urban water suppliers are required to prepare, adopt, and file an urban water management plan (UWMP). The APUD provides water for the city and is required to prepare a UWMP. The City adopted the 2015 UWMP in June 2016. The UWMP evaluates citywide water supply and demand reliability for 25 years into the future and is a baseline document for the preparation of water supply assessments.

The UWMP establishes the baseline water use to establish water use into the future. The UWMP reports water use in gallons per capita per day (gpcd) and calculates use as the City's gross water use divided by its service area population. The UWMP finds that the city consumes an average of approximately 152 gpcd. Based on this metric, Table 32, *Estimated Water Consumption for the Proposed Project*, shows the Proposed Project is expected to generate a water demand of 139,840 gallons per day (gpd) or 0.14 million gallons per day (mgd).

3. Environmental Analysis

Table 32 Estimated Water Consumption for the Proposed Project

Proposed Project Size	Avg. Gallons per Capita per Day[1]	Water Consumption	
		Gallons per Day	Million Gallons per Day
269 dwelling units (920 persons)	152	139,840	0.14

Source: Arcadis 2016.
Notes: Gallons per Capita per Day = (City's Gross Water Use) / (Service Area Population)
The average gallons per capita was calculated by using the estimated population in the 2015 Urban Water Management Plan (UWMP) Table 2-1, Population – Current and Projected, and the estimated demands in Table 2-6, Total Water Demands (AF) from 2020 through 2040.

Anaheim's 2015 UWMP projects a 2040 water supply of 67,143 acre-feet made up of groundwater, imported water, and recycled water. Anaheim's 2015 UWMP concludes there is an adequate and reliable supply of water to provide for existing demand and estimated growth through year 2040. The Proposed Project does not require a General Plan amendment; therefore, the Proposed Project is included in the growth forecast assumed under the 2015 UWMP, and the Proposed Project would not result in or require the construction of new or expanded water facilities. The Proposed Project would result in a less than significant impact.

Wastewater Treatment Facilities

As discussed in detail in Section 3.19(c), the Sewer Study (contained in Appendix K) anticipates that Proposed Project would generate 56,490 gpd of wastewater (PSOMAS 2019). As discussed in the Public Services and Facilities Element of the Anaheim General Plan, the City wastewater collector facilities convey sewage from the City to the Orange County Sanitation District (OCSD) treatment facilities. OCSD's service area comprises 479 square miles of northern and central Orange County and has 579 miles of sewer lines, 15 off-site pumping stations, 2 regional wastewater treatment plants, and an ocean disposal system. Wastewater flows by gravity from the City sewer system to OCSD's trunk and interceptor sewers, then to regional treatment and disposal facilities. The combined maximum secondary treatment capacity of both Plant No. 1 and Plant No. 2 is 332 mgd. The treatment plants currently operate with an average daily influent of 185 mgd, which leaves a remaining capacity of 147 mgd (OCSD 2019). The projected sewer demand of 56,490 gpd represents approximately 0.0038 percent of the available capacity of the wastewater treatment plants. Therefore, the Proposed Project would not result in or require the construction of new or expanded wastewater treatment facilities. The Proposed Project would result in a less than significant impact, and no mitigation measures are required.

Stormwater Drainage Facilities

The City completed a Master Plan of Storm Drainage for Carbon Creek Channel Tributary Area in September 2010 to identify deficiencies in the existing storm drain infrastructure and recommend proposed upgrades and improvements. Analysis of the watershed incorporated land use information from the Anaheim General Plan. The Project Site is in drainage subbasin 15-1, and the nearest recommended improvement from the Project Site is 1,950 feet of 24-inch parallel RCP on Lemon Street/Anaheim Street between Commercial Street and La Palma Avenue(CH2M Hill 2010).

The Project Site currently includes an automobile tow yard operated by Anaheim Fullerton Towing, which provides storage, maintenance, and company vehicle repair, as well as impound vehicle storage, from various city and police departments. In addition, the Property Owner leases a portion of the property to Ecosystem

Trucking to store/park its company vehicles. The Proposed Project would consist of a residential community of 269 multifamily units. The Project Site is currently approximately 100 percent impervious, and the Proposed Project would create approximately 1.09 acres (22 percent) of pervious, landscaped surfaces, decreasing the area of on-site impervious surfaces. As discussed in Section 3.10(a)(ii), the runoff leaving the Project Site would be less than existing conditions with implementation of the Proposed Project's stormwater infrastructure and BMPs. The Proposed Project would also decrease the runoff flow rate, as shown in Table 9. Other than the stormwater drainage facilities provided on-site as part of the Proposed Project, this analysis does not anticipate any new or relocated stormwater drainage facilities. The Preliminary Drainage Report for the Proposed Project is included in Appendix G. The preliminary WQMP for the Proposed Project is in Appendix H. The Proposed Project would result in a less than significant impact.

Electricity Facilities

As discussed under Section 3.6, *Energy*, the APUD provides electricity to the city, including the Project Site. APUD delivers more than 3.7 million MWh of electricity to Anaheim residences and businesses (APUD 2018). According to APUD's 2018 Integrated Resource Plan, residential consumers make up approximately 85 percent of Anaheim's total customer meter base; however, industry and commercial users account for approximately 75 percent of total load consumption. APUD has over 700 MW of generation capacity from renewable and nonrenewable resources. The record peak customer demand was 593 MW in July 2016. The Proposed Project is within the City's General Plan growth projections; therefore, the APUD would not anticipate that new or expanded electric power facilities would be required other than what is already required under the existing regulations. The Proposed Project would result in a less than significant impact.

Natural Gas Facilities

Southern California Gas (SoCalGas) provides natural gas service to the City, including the Project Site. SoCalGas bases the availability of natural gas service on present gas supply and regulatory policies. As a public utility, SoCalGas is under the auspices of the CPUC and federal regulatory agencies. Should these agencies take any action that affects gas supply or the conditions under which service is available, gas service would be provided in accordance with revised conditions. Development of the Proposed Project would comply with regulations and standards pertaining to natural gas. The Proposed Project would result in a less than significant impact.

Telecommunications Facilities

Private services provide telecommunication services to the City, including the Project Site, which is in an urbanized area of the City. Therefore, the area is adequately served by telecommunications facilities. The Proposed Project would include on-site connections to off-site telecommunication services and facilities in the immediate area. This Initial Study analyzes the construction-related impacts associated with these improvements as part of project development. Additionally, facilities and infrastructure for the various telecommunication providers are adequate to serve the needs of the Proposed Project. The Proposed Project would not result in or require the construction of new or expanded telecommunication facilities. The Proposed Project would result in a less than significant impact, and no mitigation measures are required.

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

Less Than Significant Impact. The APUD supplies water to the City, including the Project Site. The APUD receives a combination of imported water, local groundwater, and recycled water to meet its water needs (Arcadis 2016). Groundwater (from the Orange County Groundwater Basin) and imported water provide approximately 70 percent and 30 percent of the city's water supply, respectively. Recycled water makes up less than 1 percent of the city's water. The City anticipates that the same sources will provide water through 2040.

Anaheim's 2015 UWMP concludes that there is an adequate and reliable supply of water to provide for existing demand and estimated growth through year 2040. The UWMP determined that the City is capable of meeting customer water demands during normal-year, single-dry-year, and multiple-dry-year conditions. The Proposed Project is consistent with the City's anticipated growth projections. Therefore, the Proposed Project would not adversely affect the City's water supplies. The Proposed Project would result in a less than significant impact, and no mitigation measures are required.

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

Less Than Significant Impact. The Proposed Project would discharge sewage to the existing 8-inch vitrified clay pipe (VCP) sewer running along the east side of Anaheim Boulevard, the same side of the street as the Proposed Project. The closest manhole from the Project Site is SW070407. The same 8-inch VCP sewer line would also collect sewer flow from the future La Palma Village condominium project to the south of the Project Site. The nearest manhole from the future La Palma Village condominium project is SW070410. There is also an existing 6-inch sewer pipeline running parallel along the west side of Anaheim Boulevard. However, the Proposed Project is not tributary to the existing 6-inch sewer line. The 8-inch sewer line in Anaheim Boulevard continues north and connects to the 24-inch pipeline along Carl Karcher Way, which transitions into Romneya Drive, and then connects to the 30-inch pipeline along Euclid Street where the sewer discharges south to the outfall at La Palma Avenue.

The Sewer Technical Memorandum modeled the Proposed Project-generated sewer flow to manhole SW070407. Table 34, *Estimated Sewer Loadings for the Proposed Project*, summarizes the proposed flow generation rate and corresponding manhole loading. The proposed flow factor for apartment units is 210 gpd/du based on the Central Anaheim Master Plan of Sanitary Sewers. As shown in Table 33, the proposed flow increase for the Project is 56,490 gpd, or 39.23 gallons per minute.

Table 33 Estimated Sewer Loadings for the Proposed Project

Loading Manhole	Land Use Type	Size	Sewer Unit Flow Factor	Sewer Loading	
				Gallons per Day	Gallons per Minute
SW070407	Multi-Family Residential	269 dwelling units	210 gpd/DU	56,490	39.23

Source: Psomas 2019.

The sewer technical memorandum found that the existing condition plus the Proposed Project sewer condition shows no deficiencies along the tributary sewer pipelines, as shown in Table 2 of the Sewer Study (Appendix K to the Initial Study). Additionally, the buildout condition Scenario plus the Proposed Project sewer condition also found no deficiencies along the tributary pipeline, as shown in Table 3 of the Sewer Study. Therefore, the Sewer Study determined there is sufficient capacity in the existing sewer collection pipelines for the increased sewer flow from the Proposed Project, and no additional off-site sewer improvements are required. Impacts would be less than significant, and no mitigation measures are required

d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. According to the Public Services and Facilities Element, private contractors provide solid waste collection and disposal services to Anaheim. The City contracts with Republic Services, DBA Anaheim Disposal, for soil waste collection services (Anaheim 2019). Orange County Waste & Recycling operates landfills in and services Orange County. Orange County Waste & Recycling operates three landfills—Olinda Alpha Landfill (commercial and public disposal), Frank R. Bowerman Landfill (commercial disposal only), and Prima Deshecha Landfill (commercial and public disposal) (OCWR 2019a). Republic Services takes waste generated in Anaheim to Olinda Alpha Landfill, which is the closest landfill to the city and Project Site. Olinda Alpha Landfill has an average disposal rate of 7,000 tons per day and permitted disposal rate of 8,000 tons per day (OCWR 2019b). Additionally, Olinda Alpha Landfill is approximately 565 acres with 453 acres permitted for refuse disposal (OCWR 2016).

Based on the California Department of Resources Recycling and Recovery's (CalRecycle) soil waste generation rates, a residential development produces approximately 12.23 pounds/household/day. As shown in Table 34, *Proposed Project's Solid Waste Generation*, the Proposed Project would generate 1.64 tons per day, which represents approximately 0.16 percent of available daily capacity at the Olinda Alpha Landfill. The Proposed Project would result in a less than significant impact.

Table 34 Proposed Project's Solid Waste Generation

Proposed Project	Generation Rate	Estimated Solid Waste Production
269 dwelling units	12.23 lbs/household/day	3,290 lbs or 1.64 tons per day

Source: CalRecycle 2019.

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

Less Than Significant Impact. As discussed under section 3.19(d), the Olinda Alpha Landfill would adequately service the Proposed Project. Disposal of the Proposed Project's solid waste would be required to comply with federal, state, and local management and reduction statutes and regulations. The Hunsaker & Associates prepared a solid waste management plan for the Proposed Project. The plan is Appendix L to the Initial Study. The Proposed Project would include two dumpster (bin) enclosures in the parking structure. The enclosure at the west side of the parking structure would hold eight bins, and the enclosure at the east side of the parking structure would hold nine bins, for a total of 17 bins. Trash storage rooms would be located

throughout the Project Site to ensure all units are within 150 feet of a trash disposal location. The apartment's management team would be responsible for moving trash from the storage rooms to the dumpster enclosures for disposal. In addition to the trash storage rooms, the Proposed Project would provide two trash shoot locations. Scout trucks would transport trash bins from the trash enclosures in the parking structure and place them for collection at the trash staging area along the emergency access drive. Trash trucks would be able to activate the controlled access gate to reach the trash staging area in order to collect the trash bins. Once the trash trucks have collected the trash, the trash trucks would use the hammerhead turnaround at the east end of the main access drive. In addition to trash bin collection, the City would permit residents to dispose of large bulk items at the designated bulk trash staging location (in a 10' x 8' minimum storage area) within the parking structure. The Proposed Project would result in a less than significant impact, and no mitigation measures are required.

3.20 WILDFIRE

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

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

No Impact. The Project Site and the surrounding community are not in a "Very High Fire Hazard Severity Zone (FHSZ) designated by the California Department of Forestry and Fire Protection (CAL FIRE). Additionally, the Project Site and the surrounding area are not in a Very High FHSZ nor a "Special Protection Area" as designated by the City's General Plan Safety Element. Therefore, no impact would occur.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. As stated in threshold 3.20(a), the Project Site is not in a Very High FHSZ mapped by CAL FIRE or the City, nor is it in a Special Protection Area identified in the City of Anaheim Safety Element. Because the Project Site is not in or near state responsibility areas or lands classified Very High FHSZ, no impact related to wildfire would occur.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. As stated in threshold 3.20(a), the Project Site is not in a Very High FHSZ mapped by CAL FIRE or the City, nor is it in a Special Protection Area identified in the City of Anaheim Safety Element. Because the Project Site is not in or near state responsibility areas or lands classified Very High FHSZ, no impact related to wildfire would occur.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. As stated in threshold 3.20(a), the Project Site is not in a Very High FHSZ mapped by CAL FIRE or the City, nor is it within a Special Protection Area identified in the City of Anaheim Safety Element. Because the Project Site is not located in or near state responsibility areas or lands classified as Very High FHSZ, no impact related to wildfire would occur.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact. The Project Site does not contain any special status or sensitive biological resources. The Proposed Project would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate sensitive plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal.

As discussed in Section 3.5, *Cultural Resources*, the Proposed Project does not eliminate important examples of the major periods of California history and would not have an adverse impact on California's prehistoric cultural resources with incorporation of mitigation. Therefore, impacts would be less than significant, and no additional mitigation measures are required.

b) Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?

Less Than Significant Impact. As discussed through this Initial Study, the Proposed Project would not have short-term and/or long-term environmental impacts with implementation of mitigation measures related to air quality, cultural resources, geology and soils, land use and planning, noise, and tribal cultural resources. Therefore, the Proposed Project would not result in failure to achieve short-term nor long-term environmental goals. Impacts would be less than significant, and no additional mitigation measures are required.

c) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Less Than Significant Impact. As discussed throughout this Initial Study, the Proposed Project would have no impact and/or less than significant impacts with and without mitigation measures. Therefore, all impacts are individually limited and would not result in any cumulatively significant impact. No additional mitigation measures are required.

3. Environmental Analysis

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

Less Than Significant Impact. As discussed in the above analyses, the Proposed Project would not result in significant direct or indirect adverse impacts or result in substantial adverse effects on human beings. Impacts would be less than significant, and no additional mitigation measures are required.

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4. References

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5. List of Preparers

LEAD AGENCY

Ted White, Planning and Building Director

Susan Kim, AICP, LEED AP ND, Principal Planner

Scott Koehm AICP, Senior Planner

Andy Uk, Associate Planner

PLACEWORKS

William Halligan, Esq., Managing Principal, Environmental Services

Elizabeth Kim, Senior Associate

Mariana Zimmermann, Associate

John Vang, Senior Associate

Josh Carman, Senior Planner

Kristie Nguyen, Project Planner

Izzy Garcia, Project Planner

Cary Nakama, Graphic Designer

5. List of Preparers

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Appendix A Air Quality/GHG Data

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Appendix B Cultural Records Search

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Appendix C Geotechnical Exploration

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Appendix D Paleontological Data

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Appendix E Phase I ESA

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Appendix F Phase II ESA

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Appendix G Hydrology Analysis

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Appendix H Preliminary Water Quality Management Plan

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Appendix I Noise Data

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Appendix J Traffic Impact Analysis

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Appendix K Sewer Study

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Appendix L Solid Waste Management Plan

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Appendix M Mitigation Monitoring and Reporting Program (MMRP)

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