Townes at Broadway Project

Initial Study/Mitigated Negative Declaration
June 2021







Prepared by

Kimley»Horn

Townes at Broadway

Initial Study and Mitigated Negative Declaration

DEV2020-00180

Prepared for	City of Anaheim 200 South Anaheim Boulevard, Suite 162 Anaheim, California 92805
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Date	June 2021

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1.0

Introduction







1.0 INTRODUCTION

1.1 Purpose and Scope of the Initial Study

Pursuant to State CEQA Guidelines §15367, the City of Anaheim ("City") is the Lead Agency for the project. The Lead Agency is the public agency that has the principal responsibility for carrying out or approving a project. The City has the authority for environmental review in accordance with CEQA and certification of the environmental documentation.

Kimley-Horn and Associates, Inc. ("Consultant") has prepared this Initial Study for the City to evaluate the potential environmental effects associated with construction and operation of the proposed Townes at Broadway Project ("proposed project" or "project"). The Consultant has prepared this document in accordance with the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] §21000 et seq.) and the State CEQA Guidelines (California Code of Regulations, Title 14, §15000 et seq. Pursuant to CEQA requirements, this Initial Study includes a description of the proposed project; an evaluation of the project's potential environmental impacts; the findings of the environmental analyses; and recommended standard conditions and mitigation measures to avoid or lessen the project's significant adverse environmental impacts.

This Initial Study evaluates each of the environmental issue areas contained in the Environmental Checklist Form provided in Section 3.0. It provides decision-makers and the public with information concerning the potential environmental effects associated with project implementation, and ways to avoid or reduce potential environmental impacts. The City will use this Initial Study as a resource for decision-making when considering and taking action on the proposed project. Any responsible agency may elect to use this environmental analysis for discretionary actions associated with project implementation.

1.2 Summary of Findings

Based on the Environmental Checklist Form completed for the proposed project and supporting environmental analyses, the project would result in no impact or a less than significant impact on the majority of the environmental issues analyzed in this Initial Study. The following environmental issue areas would have no impact or a less than significant impact: Aesthetics, Agricultural Resources, Air Quality, Biological Resources, Energy, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology, Land Use, Mineral Resources, Public Services, Recreation, Transportation, Utilities and Service Systems, and Wildfires. The project's impacts on the following issue areas would be less than significant with mitigation incorporated: Cultural Resources, Geology and Soils, Noise, and Tribal Cultural Resources. All impacts would be less than significant after mitigation.

As set forth in the State CEQA Guidelines §15070 (Decision to Prepare a Negative or Mitigated Negative Declaration), a public agency shall prepare or have prepared a proposed negative declaration or mitigated negative declaration for a project subject to CEQA when:

(a) The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or

(b) The initial study identifies potentially significant effects, but:

(1) Revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and

(2) There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

1.3 Initial Study Public Review Process

The City has provided the Notice of Intent (NOI) to adopt a Mitigated Negative Declaration (MND) to the Orange County Clerk-Recorder and mailed the NOI to responsible agencies, nearby property owners, and others who expressed interest in receiving the NOI. In conjunction with the NOI, the City has released the IS/MND for a 20-day public review period in accordance with State CEQA Guidelines §15073. During the public review period, the IS/MND, including the technical appendices, can be accessed on the City's website and is available for review at the location listed below. Due to limited hours and public access to City Hall related to COVID-19, please first contact the Planning Services Division at (714) 765-5139 or planning@anaheim.net to verify Public Counter hours.

https://www.anaheim.net/876/Environmental-Documents

City of Anaheim
Planning Services Division
200 South Anaheim Boulevard
Anaheim, CA 92805

In reviewing the IS/MND, affected public agencies and interested members of the public should focus on the adequacy of the document in identifying and analyzing the project's potential environmental impacts and the ways in which the potentially significant impacts can be avoided or mitigated. If public agencies or any members of the public have comments on the IS/MND, they can send them to:

Andy Uk, Associate Planner
City of Anaheim
200 South Anaheim Boulevard, Suite 162
Anaheim, CA 92805
(714) 765-5238
auk@anaheim.net

Comments sent via email should include the project title in the subject line and a valid mailing address.

Following receipt and evaluation of comments from agencies, organizations, and/or individuals, the City will determine whether these comments raise any substantial new environmental issues. If so, further documentation may be required. If not or if the issues raised do not provide substantial evidence that the project would have a significant effect on the environment, the IS/MND and the project will be considered for adoption and approval, respectively.

1.4 Report Organization

This document includes the following sections:

Section 1.0 – Introduction. This section provides an introduction and overview describing the Initial Study conclusions.

Section 2.0 – Project Description. This section identifies the project location, objectives, and key characteristics and includes a list of anticipated discretionary actions.

Section 3.0 – Environmental Checklist. The Environmental Checklist Form provides an overview of the potential impacts that may or may not result from project implementation.

Section 4.0 – Environmental Evaluation. This section contains an analysis of environmental impacts for each resource area identified in the Environmental Checklist.

Section 5.0 – References. The section identifies resources used to prepare the Initial Study.

2.0

Project Description







2.0 PROJECT DESCRIPTION

2.1 Project Location and Setting

The approximately 6.96-acre project site is located at 2323 W. Broadway (Assessor Parcel Number [APN] 127-051-42), in the City of Anaheim, County of Orange, California. The City encompasses approximately 51 square miles in northern Orange County. The project site lies within Anaheim's western portion, near its jurisdictional boundary with the City of Buena Park. The project site is located on the north side of Broadway between the signalized intersections of Brookhurst Street to the east and Gilbert Street to the west. State Route 91 (SR-91) provides regional access to the site from the north, Interstate 5 (I-5) provides regional access from the northeast, and State Route 39 (Beach Boulevard) provides regional access from the west. Local access to the project site is from Broadway. **Exhibit 1: Regional Vicinity Map** and **Exhibit 2: Site Vicinity Map** show the project site in a regional and local context, respectively. Vehicles will access the site from one driveway located at the southeast corner of the site.

The project site is vacant. The Cornelia Connelly School, a Catholic high school for girls, previously occupied the project site until the property owner demolished it in early 2021. Several utility easements traverse the project site, including an underground transformer at the site's southwest corner. The project site frontage along Broadway includes landscaping (i.e., a strip of lawn and ornamental trees) and a sidewalk.

Table 2-1: Existing Land Use summarizes the land uses on and surrounding the project site, which predominantly consist of single-family and multiple-family residential uses.

Table 2-1: Existing Land Use

Direction	Existing Land Uses
On the Site	Vacant (former Cornelia Connelly School)
North	Single-family Residential (La Cantada gated community), Commercial Retail (Vallarta Market Shopping Center) to the northwest
South	Broadway; Single-family Residential south of Broadway, and Walt Disney Elementary School (approximately 0.25 mile southwest of the project site)
East	Multiple-family Residential (Madison Park Apartments), Brookhurst Street west of the apartments
West	Single Family Residential

2.2 Existing Land Use and Zoning

The City's General Plan Land Use Plan Map depicts the City's land use designations and indicates that the project site has a School land use designation.[1] The School land use designation identifies existing public and larger, established private schools, including elementary, junior and high schools. Schools designated on the Land Use Plan are either existing facilities or known planned facilities.

[1] City of Anaheim. (June 2020). *General Plan Land Use Plan*. Retrieved from http://www.anaheim.net/DocumentCenter/View/9519/Z0-GeneralPlan_24x55_Map?bidId=.

The City of Anaheim Zoning Map depicts the City's zoning and indicates the project site is within the "T" Transition Zone.[2] The T Zone "…includes land that is used for agricultural uses, in transitory or interim use, restricted to limited uses because of special conditions, or not zoned to one of the zoning districts in this title for whatever reason, including recent annexation." The development standards for the T Zone are in Anaheim Municipal Code (or "AMC") Chapter 18.14 (Public and Special Purpose Zone).

2.3 Project Characteristics

Site Development

As proposed, the project would allow for 112 dwelling units in 3-story townhomes at a density of 17.25 dwelling units per acre (du/ac). The townhomes would be in 22 buildings, each with between 4 and 6 townhomes. The townhomes would range from 1,606 square-feet to 1,979 square-feet with second-story balconies. Each townhome would have direct access to an attached two-car garage. **Exhibit 3: Site Plan**, depicts the proposed residential development. The project includes a landscaped pedestrian paseo at the center of the project site and a clubhouse adjacent to the entrance on Broadway.

Table 2-2: Residential Unit Summary summarizes the proposed townhomes by dwelling unit type.

Table 2-2: Residential Unit Summary

Dwelling Unit Type	Net Square Feet	Total Units
Plan 1: 2 Bedroom	1,606	22
Plan 2: 3 Bedroom	1,734	33
Plan 3: 3 Bedroom + Den (Optional 4th Bedroom)	1,797	33
Plan 4-3 Bedroom + Den (Optional 4th Bedroom)	1,979	24
Total		**112**

Source: C&V Consulting Inc, 2020.

The project requires a General Plan Amendment (GPA2020-00533) to change the land use designation from School to Low-Medium Residential. The Low-Medium Residential designation "…provides for a wide range of residential uses, including detached, small-lot single-family residences, attached single-family residences, patio homes, zero lot line residences, duplexes, townhouses, and mobile home parks." The density range for the Low-Medium Residential land use designation is 0-18 du/ac.

The project also requires a Reclassification (RCL2020-00335) to change the zoning designation from "T" to "RM-3" Multiple-Family Residential. The RM-3 Multiple-Family Residential Zone "…provides attractive, safe and healthy environment with multiple-family units with a minimum building site area per dwelling unit of two thousand four hundred (2,400) square feet." The development standards for the RM-3 Multiple-Family Residential Zone are in AMC Chapter 18.06 (Multiple Family Residential Zones). The RM-3 Zone implements the General Plan Low-Medium Residential General Plan land use designation.

[2] City of Anaheim. (July 2020). *Zoning Map.* Retrieved from https://www.anaheim.net/DocumentCenter/View/1871/Zoning-Map?bidId=.

Amenities

Based on AMC §18.06.100, which specifies that 350 square-feet of recreational-leisure area per dwelling unit shall be provided for developments within the RM-3 Multiple-Family Residential Zone, the project requires 39,200 square-feet of recreational-leisure area. The project proposes 65,840 square-feet of recreational-leisure area or an average of approximately 588 square-feet per dwelling unit, which would exceed AMC requirements. Recreational-leisure areas would include common landscape areas in front of the townhome buildings and a community recreation club. As conceptually proposed, the clubhouse area would include a swimming pool and spa, built-in barbeque area, shade structures, seating areas, equipment building, restroom, and showers.

Architecture, Landscaping, and Lighting

Exhibit 4: Conceptual Exterior Elevations, depicts the project's proposed architectural features. The proposed contemporary urban Spanish design would incorporate a mix of building materials in neutral, muted colors, with decorative tiles, metal grilles and awnings, medallions, shutters, and planter boxes for articulation. Rooftops would be finished in concrete tiles. Overall, the building would include building offsets with articulated gable style roofs to vary the project's massing. The community recreation club fronting on to Broadway would reflect the architectural style of the former Cornelia Connelly School, which previously occupied the site. Specifically, the recreation building would incorporate the school's prominent design elements, such as the school's façade and louver element designs.

Exhibit 5: Conceptual Landscape Plan depicts the proposed landscaping plan. The project proposes 281 new ornamental trees throughout the project site. Additionally, the project would retain and protect six existing eucalyptus trees at the northern property boundary and four magnolia trees fronting Broadway. The project would enhance its entryway with stamped concrete paving. Each townhouse building would have a landscaped common area with Brisbane Box, Australian Willows, and Italian Cypress trees. Four-foot-wide sidewalks would provide connectivity between residential buildings. A six-foot-wide pedestrian paseo finished in stamped concrete would provide pedestrian access from the southern project site entryway and recreation pool area to the townhome buildings at the northern part of the project site. The paseo would include olive trees with small Yew Pine trees. Landscaping along the project perimeter would include Paperbark Melaleuca, Strawberry, Italian Cypress, and Yew Pine trees.

Exhibit 6: Conceptual Lighting Plan depicts the proposed lighting plan**.** Light-Emitting Diode (LED) pole lights would be located throughout the project site, including along the guest parking and garage alleys. The project would provide shorter bollard lighting along the pedestrian walkways. The clubhouse would also have LED pole lights and tree up lights.

Parking and Circulation

The project proposes to relocate the existing driveway access on Broadway approximately 90 feet to the west. This driveway would provide full ingress and egress onto Broadway. The driveway entrance would be a 32-foot-wide, split driveway with an 8-foot-wide median landscape area. Within the residential development, drive aisles would be 28 feet. All drive aisles would accommodate standard fire lane turning radiuses and hammerhead turnaround maneuvers for emergency and fire vehicles.

The City's parking standard is 2.25 parking spaces for two-bedroom dwelling units, 3.0 parking spaces for three-bedroom dwelling units, and 0.5 space for every additional bedroom. The project proposes 22 two-bedroom units, 33 three-bedroom units, and 57 units with 3-bedrooms plus a den (optional fourth

bedroom). **Table 2-3: Residential Parking Requirements** identifies the number of parking spaces required by unit type pursuant to AMC Chapter 18.42. The project requires and proposes 348 parking spaces, including 224 garage spaces and 124 guest and open stalls. Most guest parking spaces would be along the project's western boundary. The City would prohibit curbside parking along the drive aisles.

Table 2-3: Residential Parking Requirements

Plan	Dwelling Units	Square Feet/ Bedrooms	Minimum Parking Spaces Per Unit	Parking Required
1	22	1,606/2	2.25	49.5
2	33	1,734/3	3.00	99.0
3	33	1,797/3+Den (Opt. 4)	3.50	115.5
4	24	1,979/3+Den (Opt.4)	3.50	84.0
Total	**112**	N/A	N/A	**348**

The existing sidewalk adjacent to the project site along Broadway would remain as part of project implementation.

The Anaheim General Plan Circulation Element (July 14, 2020) and the Bicycle Master Plan (July 14, 2020) identify a planned Class II bikeway on Broadway from I-5 toward Dale Avenue. The planned Class II bikeway on Broadway would be located within the existing right-of-way south of the project site; therefore, the proposed project would not impede or interfere with this planned bikeway.

The Orange County Transportation Authority (OCTA) provides public transit service throughout Orange County, including Anaheim. There are several transit stops in the project vicinity on Brookhurst Street, at the intersection of Lincoln Avenue at Broadway, and on Lincoln Avenue. The nearest transit stop is 0.25 mile east of the project site at the intersection of Broadway at Brookhurst Street, which is part of the OCTA Route 35 line. The second nearest transit stop is approximately 0.35 mile northwest of the project site at the intersection of Lincoln Avenue at Gilbert Street, which is part of the OCTA Route 42/42A.

Utility Infrastructure

Project implementation would require construction of new on-site utility infrastructure to serve the residences and associated project amenities. The project would connect these proposed utilities to existing utility infrastructure in adjacent roadways, with the final sizing and design of on-site facilities occurring during final building design and plan check.

Water and Sewer. Anaheim Public Utilities is a city-owned, not-for-profit water and electric utility that provides water and electrical services to residents and businesses in Anaheim. The City of Anaheim Public Utilities Department actively monitors the City's water supply by working with regional water supply agencies (i.e., Metropolitan Water District of Southern California (MWD) and Orange County Water District). Although the site's previous use as a school had connections to the utility system, the proposed project would provide new connections to the existing municipal water system.

The project site is within Orange County Sanitation District (OCSD) jurisdictional boundaries. The proposed project would construct new on-site and off-site sewer lines to convey the proposed project's sewer discharges to the existing sewer line in Broadway; see **Exhibit 7: Utility Plan**.

Drainage and Water Quality. Exhibit 8: Water Quality Plan depicts the project's proposed drainage and water quality features. Proposed drainage improvements include installation of three biofiltration modular wetland systems (MWS) throughout the project site. One proposed MWS would be along the project site's western boundary. A proposed 18-inch private storm drain would convey flows to a junction structure, which would connect to an existing 18-inch storm drain in Broadway. The second proposed MWS would be along the project site's northwestern boundary, near West Transit Avenue. Similarly, a proposed 18-inch storm drain would convey flows toward a proposed parkway drain on West Transit Avenue. Flows would continue on West Transit Avenue until reaching a public catch basin at the intersection of West Transit Avenue at Gilbert Street, where flows would enter the public storm drain system. The third proposed MWS is at the driveway off Broadway. The project would route a private 18-inch storm drain parallel to Broadway and join the junction structure until connecting to an 18-inch storm drain in Broadway.

Dry Utilities and Solid Waste Management. As noted above, Anaheim Public Utilities, which provides electrical power to the project site, operates its own municipal electric system and receives power from conventional resources, including nuclear, coal, renewable, and natural gas and renewable resources. The Southern California Gas Company (SoCalGas) provides natural gas to the project site. The proposed project would connect to existing utility lines, with new utility lines placed underground. Republic Services provides solid waste collection and services to the City. Republic Services would provide individual trash bins to each of the proposed units. Future residents would set up an account Republic Services and request solid waste and recycle individual bins, to be kept within niche areas in the garages.

2.4 Construction Activities

The Applicant anticipates that building construction would take approximately 25 months beginning March 2022 and ending April 2024, in the following sequence:

- Site preparation.
- Grading – 6,400 cubic yards of export. The project would install all infrastructure (i.e., storm drain, water, wastewater, dry utilities, and street improvements) during grading.
- Building construction.
- Paving, architectural coating, and landscaping.

This environmental analysis assumes an opening year of 2024.

2.5 Discretionary and Ministerial Approvals

The following discretionary and ministerial actions and/or approvals are required for the proposed project:

- **Adoption of the Initial Study/Mitigated Negative Declaration.** The proposed project requires CEQA compliance through the adoption of an IS/MND prior to project approval. This Initial Study and the proposed MND would serve as the primary environmental document for all actions associated with approval of the Townes at Broadway Project. In addition, this is the primary reference document for the formulation and implementation of a mitigation monitoring and reporting program for the proposed project.

- **General Plan Amendment.** General Plan Amendment (GPA2020-00533) to change the property's land use designation from "School" to "Low-Medium Residential" (0-18 du/ac) to allow for the proposed residential land uses.
- **Zoning Map Amendment ("Reclassification").** Reclassification (RCL2020-00335) from the "T" Transitional Zone to "RM-3" Multiple-Family Residential Zone to implement the General Plan Low-Medium Residential land use designation.
- **Tentative Tract Map.** Tentative Tract Map (SUBTM19137) to allow a condominium subdivision for a 112-unit townhome project.
- **Conditional Use Permit.** Conditional Use Permit (CUP2020-06094) to allow a deviation in the interior building separations for three-story primary walls**,** from 40 feet to a minimum of 16.5 feet between side to side primary wall elevations, and 28 feet between front to front primary wall elevations.
- **Demolition, grading, and building permits.**
- **Other.** Any other permit or approval required by an agency with jurisdiction over the project.

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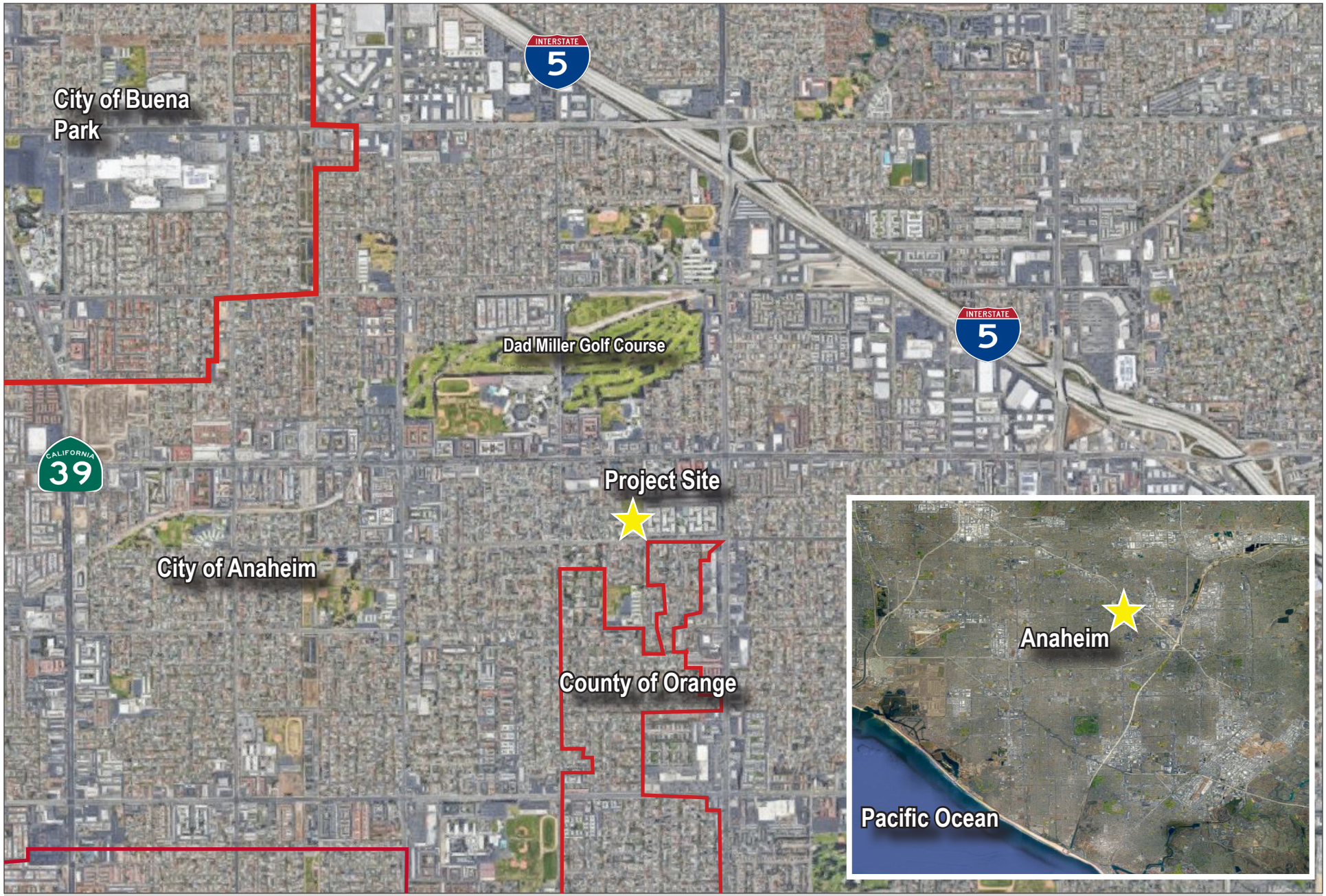


EXHIBIT 1: Regional Vicinity Map
Townes at Broadway Project

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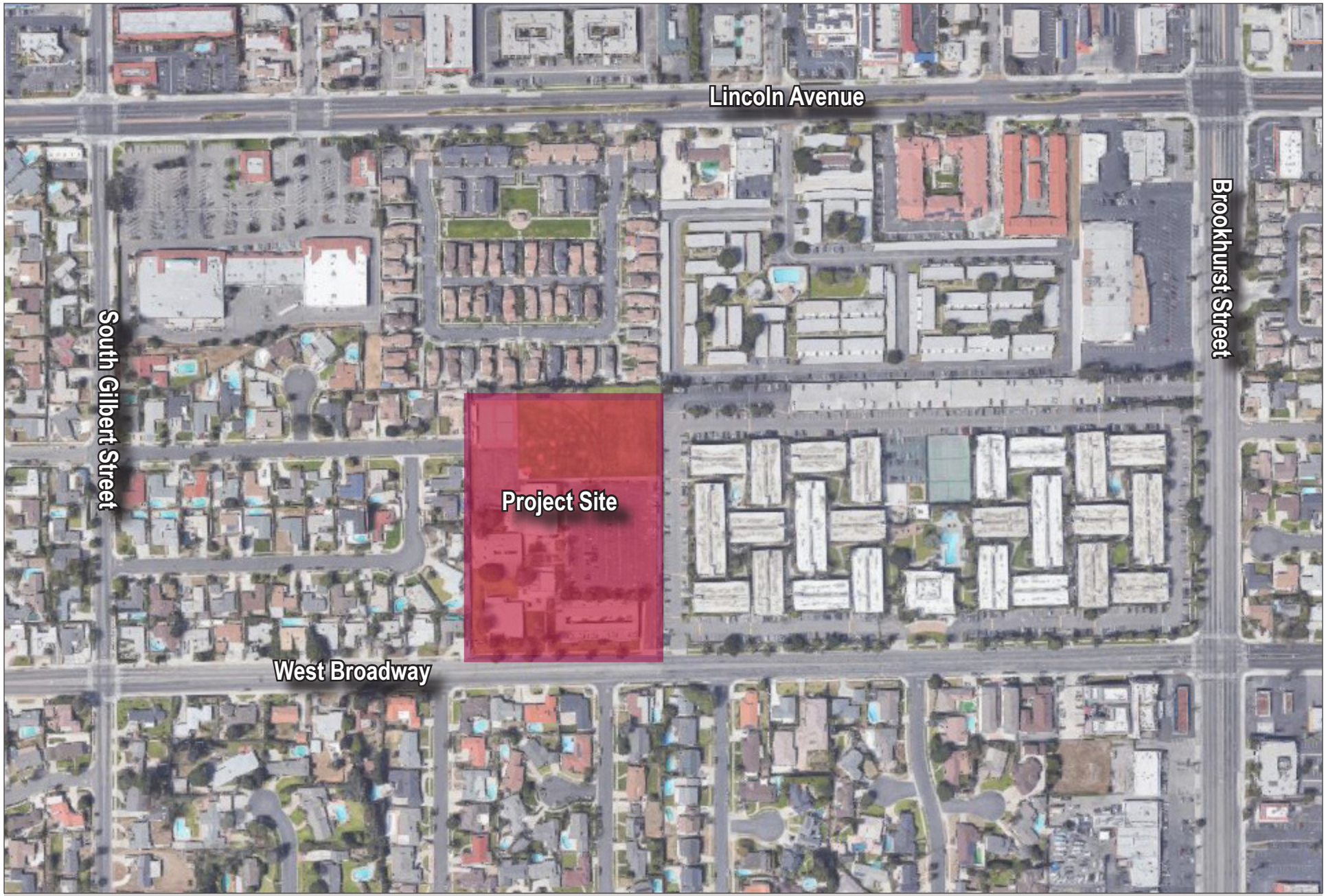


EXHIBIT 2: Local Vicinity Map
Townes at Broadway Project

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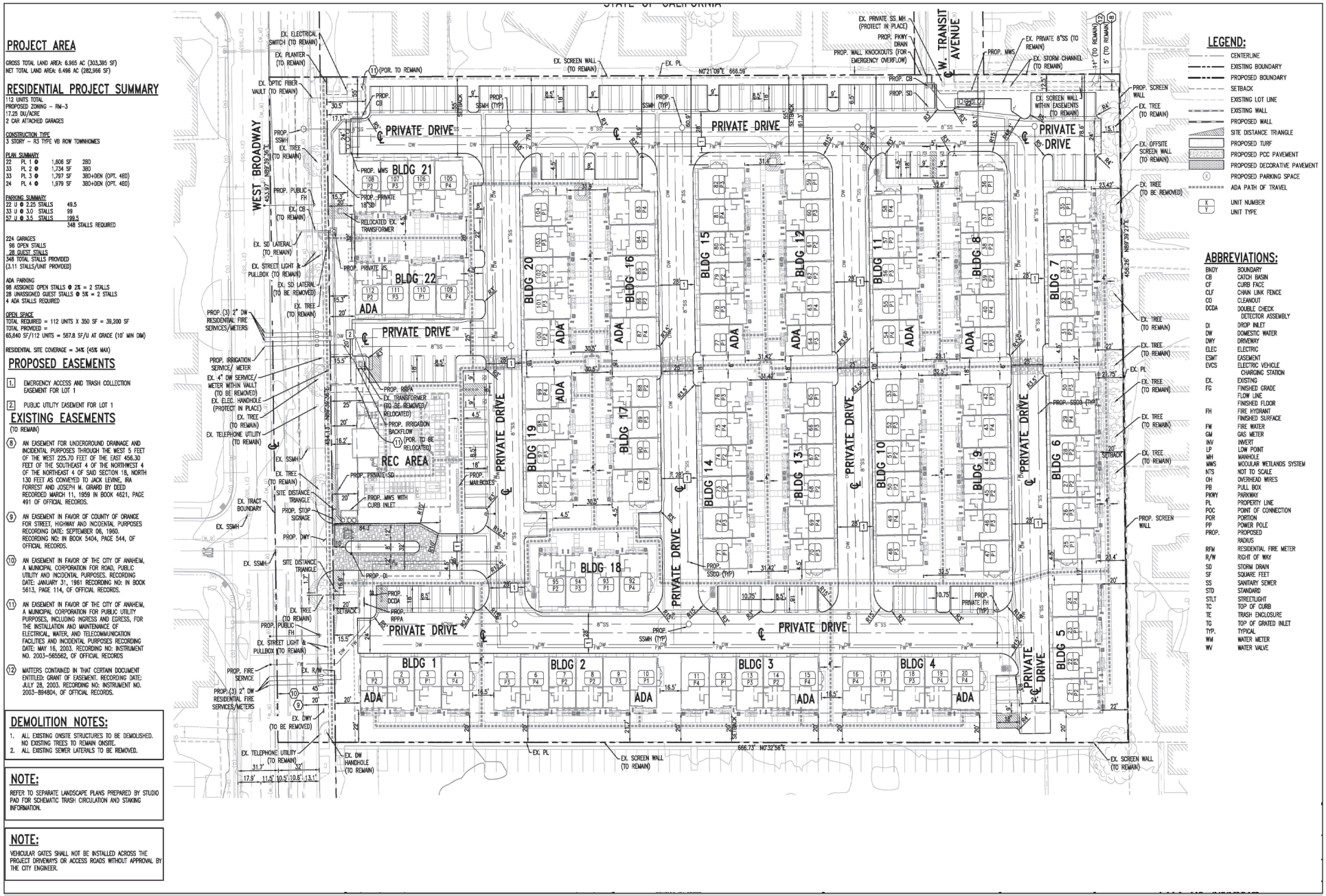


EXHIBIT 3: Site Plan

Townes at Broadway Project

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NORTHEAST VIEW FROM BROADWAY



NORTHWEST VIEW FROM BROADWAY

EXHIBIT 4a: Conceptual Exterior Elevations - Street View

Townes at Broadway Project

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RIGHT ENHANCED ELEVATION



RIGHT ELEVATION



REAR ELEVATION



LEFT ELEVATION



FRONT ELEVATION

MATERIAL SCHEDULE

1. ROOF - CONCRETE S TILE ROOFING
2. FASCIA - STUCCO OVER SHAPED FOAM CORNICE
3. WALL - EXTERIOR LIGHT DASH FINISH STUCCO
4. RAILING - VERTICAL METAL
5. VINYL WINDOW W/ STUCCO O/ E.P.S. TRIM
6. RECESSED VINYL WINDOW W/ SLOPED SILL
7. DECORATIVE GABLE ACCENT
8. STUCCO CONTROL JOINT
9. DECORATIVE LIGHT FIXTURE
10. DECORATIVE COMPOSITE SHUTTER
11. DECORATIVE METAL POTSHELF
12. DECORATIVE ACCENT TILE
13. DECORATIVE METAL AWNING
14. DECORATIVE METAL GRILLE
15. DECORATIVE SHAPED FOAM CORBELS

EXHIBIT 4b: Conceptual Exterior Elevations - Building A

Townes at Broadway Project

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RIGHT ELEVATION



REAR ELEVATION



LEFT ELEVATION



FRONT ELEVATION

MATERIAL SCHEDULE

1. ROOF - CONCRETE S TILE ROOFING
2. FASCIA - STUCCO OVER SHAPED FOAM CORNICE
3. WALL - EXTERIOR LIGHT DASH FINISH STUCCO
4. RAILING - VERTICAL METAL
5. VINYL WINDOW W/ STUCCO O/ E.P.S. TRIM
6. RECESSED VINYL WINDOW W/ SLOPED SILL
7. DECORATIVE GABLE ACCENT
8. STUCCO CONTROL JOINT
9. DECORATIVE LIGHT FIXTURE
10. DECORATIVE COMPOSITE SHUTTER
11. DECORATIVE METAL POTSHELF
12. DECORATIVE ACCENT TILE
13. DECORATIVE METAL AWNING
14. DECORATIVE METAL GRILLE
15. DECORATIVE SHAPED FOAM CORBELS

EXHIBIT 4c: Conceptual Exterior Elevations - Building B

Townes at Broadway Project

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RIGHT ELEVATION



REAR ELEVATION



LEFT ELEVATION



FRONT ELEVATION

MATERIAL SCHEDULE

1. ROOF - CONCRETE S TILE ROOFING
2. FASCIA - STUCCO OVER SHAPED FOAM CORNICE
3. WALL - EXTERIOR LIGHT DASH FINISH STUCCO
4. RAILING - VERTICAL METAL
5. VINYL WINDOW W/ STUCCO O/ E.P.S. TRIM
6. RECESSED VINYL WINDOW W/ SLOPED SILL
7. DECORATIVE GABLE ACCENT
8. STUCCO CONTROL JOINT
9. DECORATIVE LIGHT FIXTURE
10. DECORATIVE COMPOSITE SHUTTER
11. DECORATIVE METAL POTSHELF
12. DECORATIVE ACCENT TILE
13. DECORATIVE METAL AWNING
14. DECORATIVE METAL GRILLE
15. DECORATIVE SHAPED FOAM CORBELS

EXHIBIT 4d: Conceptual Exterior Elevations - Building C

Townes at Broadway Project

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RIGHT ELEVATION



REAR ELEVATION



LEFT ELEVATION



FRONT ELEVATION

MATERIAL SCHEDULE

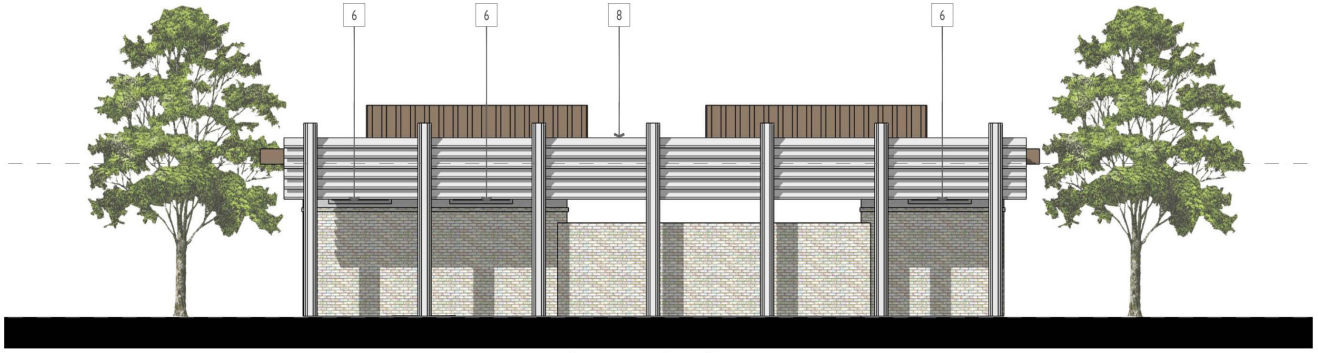
1. ROOF - CONCRETE S TILE ROOFING
2. FASCIA - STUCCO OVER SHAPED FOAM CORNICE
3. WALL - EXTERIOR LIGHT DASH FINISH STUCCO
4. RAILING - VERTICAL METAL
5. VINYL WINDOW W/ STUCCO O/ E.P.S. TRIM
6. RECESSED VINYL WINDOW W/ SLOPED SILL
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12. DECORATIVE ACCENT TILE
13. DECORATIVE METAL AWNING
14. DECORATIVE METAL GRILLE
15. DECORATIVE SHAPED FOAM CORBELS

EXHIBIT 4e: Conceptual Exterior Elevations - Building D

Townes at Broadway Project

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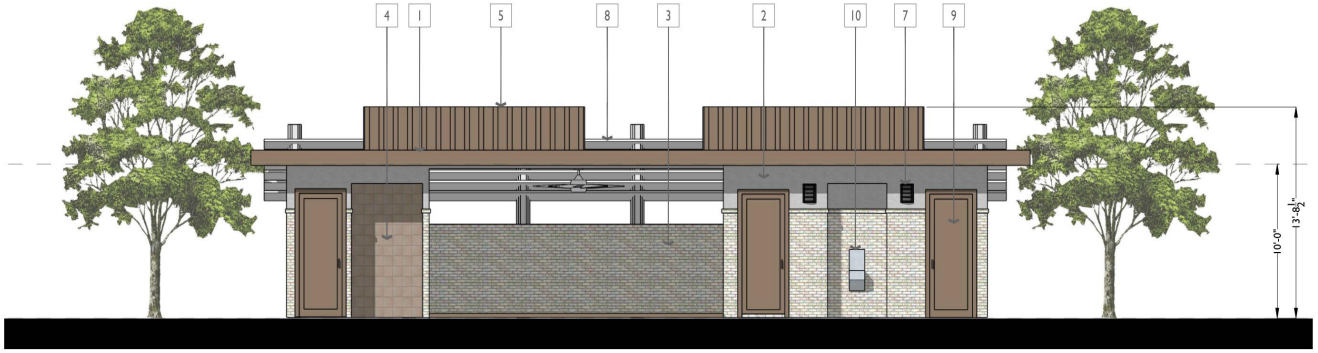
REAR ELEVATION



LEFT ELEVATION



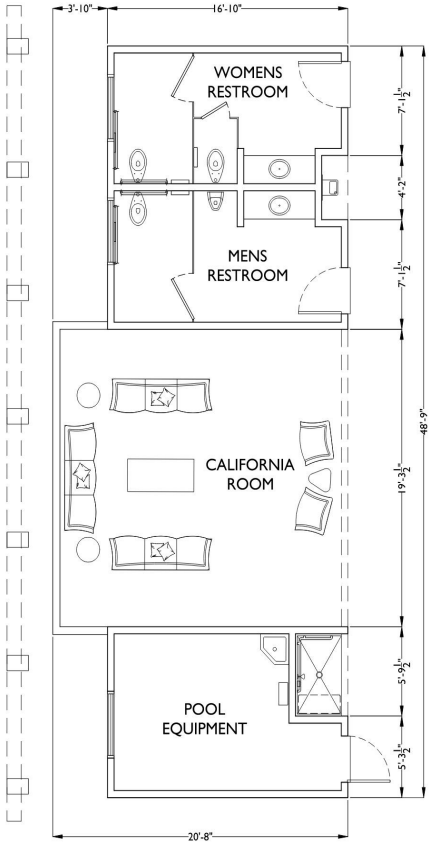
RIGHT ELEVATION



FRONT ELEVATION

MATERIAL SCHEDULE

1. FASCIA - RESAWN WOOD
2. WALL - EXTERIOR LIGHT DASH FINISH STUCCO
3. WALL - BRICK VENEER
4. WALL - CERAMIC TILE @ SHOWER
5. WALL - VERTICAL SIDING
6. VINYL WINDOW W/ STUCCO O/ E.P.S. TRIM
7. DECORATIVE LIGHT FIXTURE
8. EXISTING LOUVERED SCREEN
9. EXTERIOR METAL DOOR
10. EXTERIOR DRINKING FOUNTAIN



FLOOR PLAN - 898 S.F.

EXHIBIT 4f: Conceptual Exterior Elevations - Recreational Facility

Townes at Broadway Project

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Sight-line Triangles.
Maintain 30" to 8'
Clearance Within This Area

LEGEND

1. Central community recreation club with swimming pool, built-in BBQ entertainment counter, shade structure & various site furnishings and colored concrete deck.
2. Main vehicular project entry with enhanced stamped concrete paving and project monumentation / signage.
3. Proposed pilaster with bronze plaque describing site's historical values.
4. Central 6' wide pedestrian concrete paseo with enhanced paving, specimen tree pockets and bench seating.
5. ±10' Wide enhanced paving crosswalks, pattern to match main entry.
6. Community cluster mailboxes & parcel lockers, final quantities & locations per USPS review & approval.
7. 5' Wide walkway when adjacent to head-in parking stalls; in natural colored concrete, with light broom finish & narrow tooled joints.
8. 4' wide walks, unit entry walks / stoops in natural colored concrete, with light broom finish & narrow tooled joints.
9. Enhanced colored paving nodes at courtyard entries and walk intersections.
10. Wall, pilaster, gate or fence, per Wall & Fence Plan.
11. Proposed tree, per Planting Plan.
12. Existing tree to remain and protect in place.
13. Accessible parking stall and striping, per Civil plans.
14. Guest parking stall & drive lane, per Civil plans.
15. Natural colored concrete driveway, with light broom finish and tooled joints.
16. Common area landscape, builder installed and HOA maintained.
17. Community dog bag station (black in color), for pet owners.
18. Property line / R.O.W, per Civil plans.
19. Public street curb & street sidewalk, per Civil plans.
20. Transformer to be screened with landscape, quantity and final locations to be determined.
21. Proposed AC condenser location to be screened with evergreen shrubs.
22. Bench seating, style to complement architecture.
23. Visitor bike rack (for 2 bike parking stalls).







*Conceptual images (provided herein are all subject to change)

EXHIBIT 5: Conceptual Landscape Plan

Townes at Broadway Project

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LIGHTING SCHEDULE

SYMBOL	MANUFACTURER/MODEL/DESCRIPTION	QTY
	LED Area Pole Light Pole light, quantities and specification per Electrical Eng. Refer to SWGroup's Electrical Plans. Cast Aluminum, Textured Bronze, RA21 Radius Lamp: Per Elec. Eng., Per Elec. Eng., Per Elec. Eng. Accessories: On DBC-1 Base & 10' round pole.	20
	Bollard, Kichler Louvered 2800K LED Bollard AZT 16130AZT28 (Textured Architectural Bronze) Cast aluminum, Textured Architectural Bronze, Surface, with footing, Finall location by Elec. Eng. Footing specs per Manufacturer. Lamp: LED, 3.5W,3.67VA, 2700K Warm White	17
	Shade Structure Downlight - Kichler model #16017AZT27. Cast Aluminum, Textured Architectural Bronze, Surface Mounted Bracket Lamp: LED, 5.25 W-12W, 2700K Warm White	4
	Tree uplight, Staked - Kichler model VLO #16018-16020. Order #16019AZT27 (35Flood). Cast aluminum, Textured Architectural Bronze, Staked Lamp: LED, 5.25 W-12W, 2700K Warm White	32
	Low-voltage transformer - Kichler model #15PR300 SS. Cast Aluminum, Stainless Steel, Wall 300W Accessories: Install with Mechanical Transformer Timer (#15557BK & Plug-In Transformer Remote Photocell (#15534K).	5
	Exterior Electrical GFI Outlet Cast Aluminum, Textured Architectural Bronze, Wall	3
	Kichler-Flood Light VLO 12V LED Flood Variable Lumen AZT 16022AZT27 Brass, Textured Architectural Bronze, Surface Lamp: LED	1













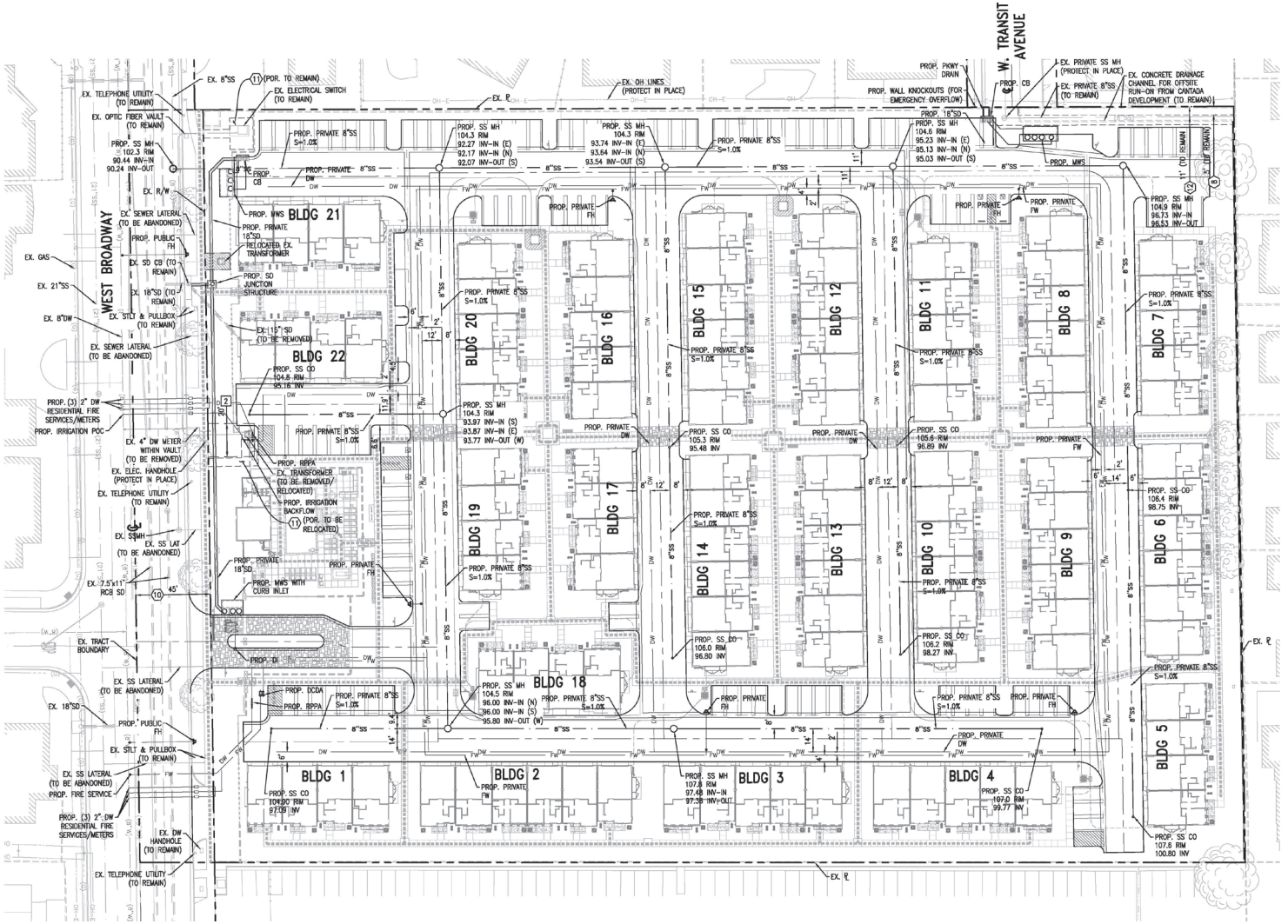
*Conceptual images (provided herein are all subject to change)

EXHIBIT 6: Conceptual Lighting Plan

Townes at Broadway Project

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LEGEND:

- CENTERLINE
- EX. BOUNDARY
- PROP. BOUNDARY
- EASEMENT
- FW — PROP. FIRE WATER
- DW — PROP. DOMESTIC WATER
- SS — PROP. SANITARY SEWER
- PROP. STORM DRAIN

UTILITY NOTES:

1. ALL ONSITE WET UTILITIES SHALL BE PRIVATE, PRIVATELY OWNED AND MAINTAINED BY PROPOSED LOT OWNER AND/OR HOMEOWNER'S ASSOCIATION.
2. ANY/ALL IMPROVEMENTS PROPOSED OR REQUIRED WITHIN THE PUBLIC RIGHT-OF-WAY SHALL BE CONSTRUCTED UNDER A SEPARATE RIGHT-OF-WAY CONSTRUCTION PERMIT (ROP) IN ACCORDANCE WITH THE CITY STANDARDS AND SUBJECT TO THE APPLICABLE SUBMITTAL AND FEE/DEPOSIT REQUIREMENTS.
3. THE DEVELOPER/OWNER SHALL POTHOLE ALL UTILITY CROSSINGS AND CONNECTION POINTS DURING DESIGN PHASE TO VERIFY ADEQUATE CLEARANCES PER CITY'S REQUIREMENTS.
4. PROPOSED PUBLIC WATER EASEMENTS PER SEPARATE INSTRUMENT. APPLICANT SHALL COORDINATE WITH ANAHEIM PUBLIC UTILITIES, WATER ENGINEERING DIVISION FOR ADDITIONAL INFORMATION AND REQUIREMENTS.

PROPOSED UTILITY EASEMENTS:

(2) PUBLIC WATER EASEMENT FOR LOT 1

EXISTING UTILITY EASEMENTS:

(TO REMAIN)

(8) AN EASEMENT FOR UNDERGROUND DRAINAGE AND INCIDENTAL PURPOSES THROUGH THE WEST 5 FEET OF THE WEST 225.70 FEET OF THE EAST 456.30 FEET OF THE SOUTHEAST 4 OF THE NORTHWEST 4 OF THE NORTHEAST 4 OF SAID SECTION 18, NORTH 130 FEET AS CONVEYED TO JACK LEVINE, IRA FORREST AND JOSEPH M. GIRARD BY DEED RECORDED MARCH 11, 1959 IN BOOK 4821, PAGE 491 OF OFFICIAL RECORDS.

(10) AN EASEMENT IN FAVOR OF THE CITY OF ANAHEIM, A MUNICIPAL CORPORATION FOR ROAD, PUBLIC UTILITY AND INCIDENTAL PURPOSES. RECORDING DATE: JANUARY 31, 1961 RECORDING NO: IN BOOK 5613, PAGE 114, OF OFFICIAL RECORDS.

(11) AN EASEMENT IN FAVOR OF THE CITY OF ANAHEIM, A MUNICIPAL CORPORATION FOR PUBLIC UTILITY PURPOSES, INCLUDING INGRESS AND EGRESS, FOR THE INSTALLATION AND MAINTENANCE OF ELECTRICAL, WATER, AND TELECOMMUNICATION FACILITIES AND INCIDENTAL PURPOSES RECORDING DATE: MAY 16, 2003. RECORDING NO: INSTRUMENT NO. 2003-565562, OF OFFICIAL RECORDS.

(12) MATTERS CONTAINED IN THAT CERTAIN DOCUMENT ENTITLED: GRANT OF EASEMENT. RECORDING DATE: JULY 28, 2003. RECORDING NO: INSTRUMENT NO. 2003-894804, OF OFFICIAL RECORDS.

EXHIBIT 7: Utility Plan

Townes at Broadway Project

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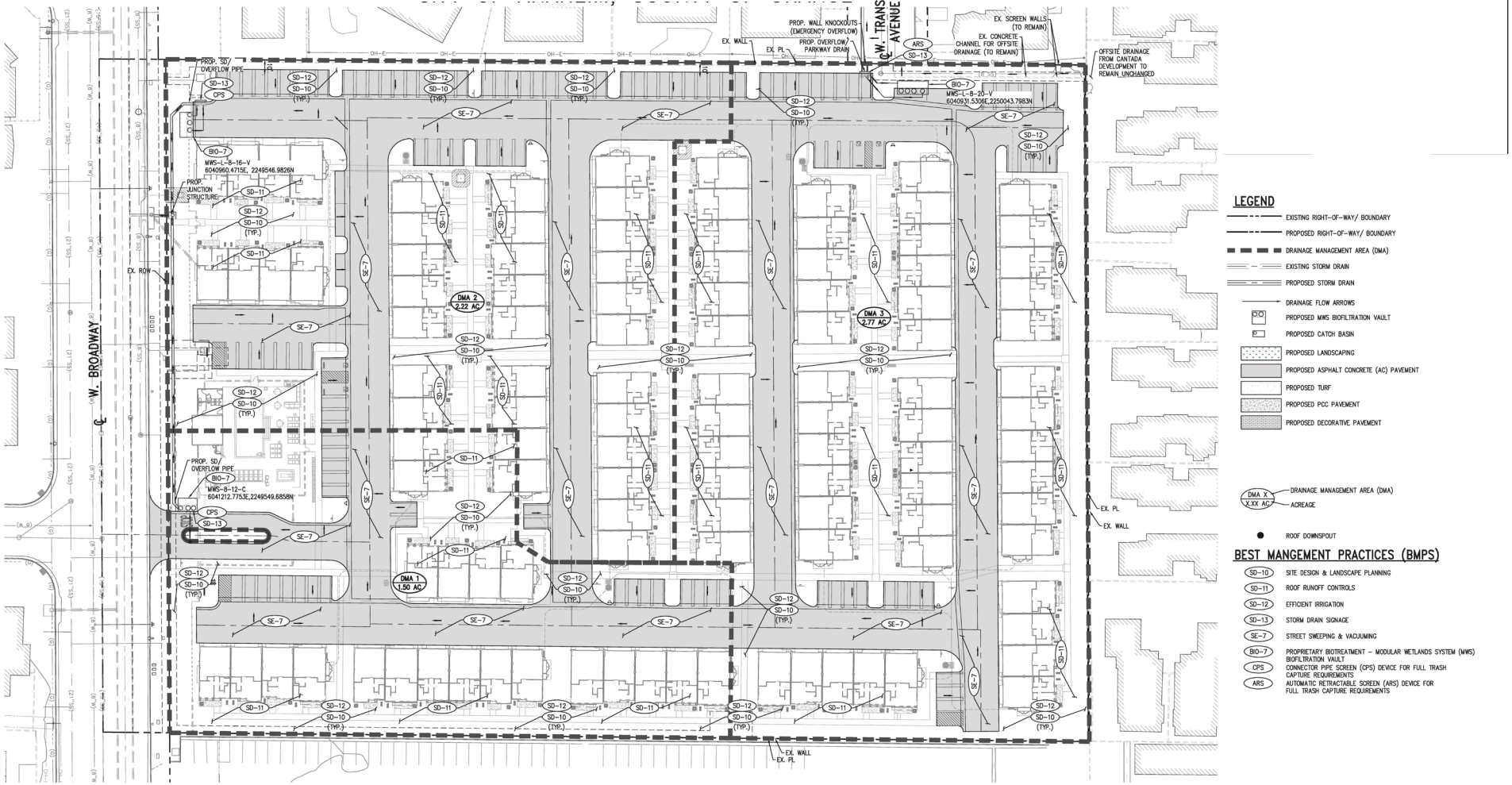


EXHIBIT 8: Water Quality Plan

Townes at Broadway Project

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3.0

Initial Study Checklist







3.0 INITIAL STUDY CHECKLIST

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

DETERMINATION:

On the basis of this initial evaluation (check one):

☐ 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.

CERTIFICATION:

Prepared by:

 Project Manager, June 22, 2021

Kimley-Horn and Associates, Inc.

Reviewed by:

 Associate Planner, June 22, 2021

Andy Uk, City of Anaheim

ENVIRONMENTAL CHECKLIST

ENVIRONMENTAL IMPACTS Issues		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
1.	**AESTHETICS. Except as provided in Public Resources Code §21099, would the project:**				
a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b)	Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c)	In non-urbanized areas, substantially degrade the existing visual character or quality of public views 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?	☐	☐	☒	☐
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐
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 Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. 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?	☐	☐	☐	☒
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code §51104(g))?	☐	☐	☐	☒

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒
3. 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?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	☐	☐	☒	☐
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 Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological	☐	☐	☐	☒

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒
5. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to in §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐
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?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐
7. GEOLOGY AND SOILS. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the	☐	☒	☐	☐

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				
ii) Strong seismic ground shaking?	☐	☒	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☒	☐	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
8. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
9. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒
10. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) Result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	☐	☐	☒	☐
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?	☐	☐	☒	☐
iv) Impede or redirect flood flows?	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐
11. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
12. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
13. 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?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
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?	☐	☐	☐	☒
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)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
15. PUBLIC SERVICES. Would the project result in				
a) 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:				
i) Fire protection?	☐	☐	☒	☐
ii) Police protection?	☐	☐	☒	☐

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
iii) Schools?	☐	☐	☒	☐
iv) Parks?	☐	☐	☒	☐
v) Other public facilities?	☐	☐	☒	☐
16. RECREATION. Would the project:				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) 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?	☐	☐	☒	☐
17. TRANSPORTATION. Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Would the project conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐
18. TRIBAL CULTURAL RESOURCES. Would the project:				
a) 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				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of	☐	☒	☐	☐

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
historical resources as defined in Public Resources Code §5020.1(k)?				
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?	☐	☒	☐	☐
19. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?				
i) Water	☐	☐	☒	☐
ii) Wastewater Treatment	☐	☐	☒	☐
iii) Electric Power, Natural Gas, Telecommunications	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐
f) Result in a need for new systems or supplies, or substantial alternations related to electricity?	☐	☐	☒	☐
g) Result in a need for new systems or supplies, or substantial alternations related to natural gas?	☐	☐	☒	☐
h) Result in a need for new systems or supplies, or substantial alternations related to telephone service?	☐	☐	☒	☐
i) Result in a need for new systems or supplies, or substantial alternations related to television service/reception?	☐	☐	☒	☐
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?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

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

4.0

Environmental Analysis







4.0 ENVIRONMENTAL ANALYSIS

4.1 Aesthetics

Threshold (a) Would the project have a substantial adverse effect on a scenic vista?

No Impact. The *City of Anaheim General Plan Green Element* specifies that natural slopes are considered the primary aesthetic resources in the City's (Anaheim) Hill and Canyon Area.[3] Other scenic amenities such as golf courses and the Santa Ana River also provide visual relief from the built environment and are important visual amenities and landmarks. The project site is in West Anaheim and approximately 23 miles west of the Santa Ana Mountain range and approximately 10 miles from the City's (Anaheim) Hill and Canyon Area. Further, the Dad Miller Golf Course is 0.4 mile north of the project site. General Plan Green Element Goal 2.1 aims to preserve views of ridgelines, natural open space and other scenic vistas wherever possible. The project site is characterized with flat topography and bordered by existing residential land uses and mature trees; there are no scenic views of the mountains and or golf course. The proposed project would not significantly affect public viewpoints of these scenic vistas. In addition, the proposed project would not adversely visually affect pedestrians, cyclists and along Broadway. No public scenic viewpoints are present within the project area. Therefore, the proposed project would not have an adverse effect on a scenic vista and no mitigation is required.

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

No Impact. There are no State- or County-designated scenic highways in the project site vicinity.[4] General Plan Circulation Element Figure C-3, Scenic Highways, depicts the City's locally designated highways and expressways, and indicates none are located near the project site. The scenic highway nearest the project site, which is 1.7 miles to the north, is SR-91. Further, the project site is currently vacant and there are no scenic (e.g., trees of significance, rock outcroppings, or historic buildings) on the site. Therefore, the proposed project would not damage scenic resources within a State scenic highway and no mitigation is required.

Threshold (c) In non-urbanized areas, would the project 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 points). 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 is within an urbanized area in West Anaheim. Until early-2021, the project site was developed with a private high school. Land uses proximate to the project site are predominantly residential, although commercial and retail uses exist north of the project site along Lincoln Avenue. Specifically, the project site is bordered by multiple-family and single-family residences, including the three-story Madison Park Apartment homes to the east; single-family residences to the north and west; and single-family residences south of Broadway. The project would remove existing on-site improvements and construct 112, three-story townhomes at a density of 17.25 du/ac. The proposed

[3] City of Anaheim. (July 2020). *City of Anaheim General Plan Green Element.*

[4] California Department of Transportation. (2011). *California Scenic Highways.* Available at https://www.arcgis.com/home/webmap/viewer.html?layers=f0259b1ad0fe4093a5604c9b838a486a. Accessed October 29, 2019.

townhomes would have a maximum height of 37 feet 9 inches, which would be below the RM-3 Multiple-Family Residential Zone's maximum height limit of 40 feet.

The on-site and surrounding zoning with their AMC regulations pertaining to each zone are as follows:

- Project Site (Existing): T Zone (AMC Chapter 18.18)
- North: RM-2 Zone (AMC Chapter 18.06)
- South: RS-2 Zone (AMC Chapter 18.04)
- East: RM-4 Zone (AMC Chapter 18.06)
- West: RS-2 Zone (AMC Chapter 18.04)

The regulations specified above do not provide standards governing scenic quality. Additionally, the Scenic Corridor (SC) Overlay Zone, which governs scenic quality in certain areas of the City, does not apply to the project site or the surrounding properties. The City would ensure compliance with all required development standards through the City's Planning and Building Department's review during the application process and future review of building permits. Therefore, impacts would be less than significant and no mitigation is required.

Threshold (d) Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. The project site is in an urbanized area with existing light sources, which include streetlights on Broadway, residential lighting, and vehicle headlights and traffic signals. No nighttime construction is proposed and construction activities would be subject to AMC §6.70.010, which restricts construction activities to between the hours of 7:00 AM and 7:00 PM. Therefore, the proposed project would not require construction lighting, except security and safety lighting.

The proposed project would generate lighting from two primary sources: lighting from building interiors that would pass through windows, and lighting from exterior sources (e.g., street lighting, parking area lighting, building illumination, security lighting, and landscape lighting). This proposed lighting is typical of lighting proposed for multiple-family residential developments. Additionally, the proposed recreation club and associated amenities would provide lighting to allow for nighttime use.

The project's outdoor parking area lighting would be subject to compliance with AMC §18.42.090.0301. In addition, the City's Planning and Building Department would review any proposed lighting to ensure conformance with the California Building Code, Title 24 (California Code of Regulations), as well as the California Green Building Standard Code (Part 11 of Title 24, California Code of Regulations), such that only the minimum amount of lighting is used and no light spillage occurs. Although the proposed project would introduce new light sources, the surrounding area is urban and already illuminated. The proposed lighting conditions would be similar to that currently used surrounding the project site, which would not cause adverse effects; therefore, a less than significant impact would occur and no mitigation is required.

Sunlight or artificial light reflecting from finished surfaces such as window glass or other reflective materials can cause reflected light (glare). Buildings constructed of highly reflective materials from which the sun reflects at a low angle commonly cause adverse glare. The project does not propose use of materials known to cause glare, such as mirrored/reflective glass; therefore, a less than significant impact would occur and no mitigation is required.

Cumulative Impacts

When evaluating cumulative aesthetic impacts, the Consultant considered a number of factors. The cumulative study area for aesthetic impacts is the viewshed that includes the project site and immediately surrounding areas. The context in which the public views a project will also influence the significance of the aesthetic impact. The contrast a project has with its surrounding environment is in relation to other cumulative projects. For example, if most of an area becomes urbanized, the contrast of a project with the natural surroundings may be less since it would not stand out in contrast as much. In order for a cumulative aesthetic impact to occur, the aesthetic impacts from cumulative projects would need to occur within the same geographic area to substantially alter the existing viewshed or existing scenic character of an area. The cumulative projects would need to be visible together or near each other so a viewer could perceive them in the same view.

There are no vacant or open space properties adjacent to or in the project site's immediate vicinity, or viewshed, or sites proposed for development. Other potential future projects in the viewshed would likely be renovations or rehabilitations because existing development surrounds the project site. No cumulative visual impacts would occur.

Standard Conditions and Mitigation Measures

No standard conditions or mitigation measures are applicable or required.

4.2 Agriculture and Forestry Resources

Threshold (a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps pursuant to the Farmland Mapping and Monitoring Program of the California Resource Agency, to non-agricultural use?

No Impact. The project site and surrounding area are in a developed urban environment. The State of California, Department of Conservation, Farmland Mapping and Monitoring Program, designates the project site as Urban and Built-Up Land, which is defined as land developed at a density of at least one dwelling unit (du) per 1.5 acres, or approximately six structures to a ten-acre parcel. There is no Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance on the project site or in its vicinity.[5] In addition, the proposed project would not convert any farmland to non-agricultural use. Therefore, no impact would occur and no mitigation is required.

Threshold (b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act Contract?

No Impact. The project site is located within the "T" Zone. The T Zone includes land used for agricultural uses, in a transitory or interim use, restricted to limited uses because of special conditions, or not zoned to one of the zoning districts in this title for whatever reason, including recent annexation. The project site is former school site and is not currently an agriculture use. In addition, the proposed project would amend the Zoning Map to reclassify the project site from the T Zone to the RM-3 Zone, a multiple-family residential zone. Therefore, no impact would occur and no mitigation is required.

A Williamson Act contract between local governments and private landowners restricts specified parcels of land to agricultural or related open space use in return for a lower property tax assessment. The site is not under a Williamson Act contract. Therefore, no impact would occur and no mitigation is required.

Threshold (c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code §51104 (g))?

Threshold (d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The project site is within the T Zone; there is no existing zoning for forest land, timberland, or timberland zoned for production in the City. There are no forest or timberland resources on the project site and the proposed zoning would not permit such uses. The proposed project would not conflict with existing zoning for forest land, timberland, or timberland production. Therefore, no impact would occur and no mitigation is required.

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

No Impact. The project site and surrounding area do not contain Farmland or forest land. Therefore, project implementation would not directly or indirectly result in the conversion of property from

[5] California Important Farmland Finder, State of California Department of Conservation, https://maps.conservation.ca.gov/dlrp/ciff/, accessed January 27, 2021.

agricultural or timberland uses to non-agricultural or non-forest land uses. No impact would occur and no mitigation is required.

Cumulative Impacts

The project site is located within the T Zone, surrounded by properties within single-family or multiple-family residential zones. The T Zone includes land used for agricultural uses, in a transitory or interim use, restricted to limited uses because of special conditions, or not zoned to one of the zoning districts in this title for whatever reason, including recent annexation. The project site is former school site and is not currently an agriculture use. In addition, the proposed project would amend the Zoning Map to reclassify the project site from the T Zone to the RM-3 Zone, a multiple-family residential zone. Furthermore, the City has not zoned the project site for forestry-related uses. Project implementation would not impact agricultural and forestry resources. Further, the General Plan does not identify any agricultural or forestry resources within the City. Therefore, no cumulative impacts would occur.

Standard Conditions and Mitigation Measures

No standard conditions or mitigation measures are required.

4.3 Air Quality

Kimley-Horn has conducted an air quality analysis for the proposed project. The output and results of the air quality modeling are included in **Appendix A: Air Quality/Greenhouse Gas Data** and summarized below.

Threshold (a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The project site is in the South Coast Air Basin (Air Basin) which includes all of Orange County and non-desert portions of San Bernardino, Los Angeles, and Riverside counties. The Air Basin is approximately 6,600 square miles extending from the Pacific Ocean to the San Gabriel, San Bernardino, and San Jacinto Mountains. The Air Basin is a coastal plain with broad valleys and low hills, and semi-arid climate. The South Coast Air Quality Management District (South Coast AQMD) and the California Air Resources Board (CARB) monitor air quality within the Air Basin.

South Coast AQMD and the Southern California Association of Governments (SCAG) prepare the Air Quality Management Plan (AQMP). Air quality plans describe strategies to control air pollution and measures for implementation by a city, county, region, and/or air district. An AQMP's primary purpose is to bring an area that does not attain federal, and State, air quality standards into compliance with federal Clean Air Act and California Clean Air Act requirements. The AQMP uses the term "non-attainment" to describe an air basin that exceeds one or more ambient air quality standards. In addition, the goal of AQMPs is to ensure that an area maintains a healthful level of air quality based on National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS).

The current plan is the 2016 AQMP adopted on March 3, 2017. The 2016 AQMP meets the State and federal Clean Air Act planning requirements and focuses on federal ozone and ultra-fine particulate matter ($PM_{2.5}$) standards. The South Coast AQMD prepared the 2016 AQMP to accommodate growth; reduce the high levels of pollutants within the areas under the jurisdiction of South Coast AQMD; and attain clean air within the region. In order for a project to be consistent with the AQMP, it would have been included in the projections used to formulate the AQMP.

The South Coast AQMD's CEQA Handbook identifies two key indicators of consistency with the AQMP:

1. Whether a project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.

2. Whether a project will exceed the assumptions in the AQMP based on the year of project buildout and phase.

According to the South Coast AQMD's CEQA Air Quality Handbook, the purpose of the consistency finding is to determine if a project is inconsistent with the AQMP assumptions and objectives, and therefore if it would interfere with the region's ability to comply with CAAQS and NAAQS.

Concerning the first criterion, based on the air quality modeling analysis conducted for the proposed project, project construction and operations would not result in significant impacts based on the South Coast AQMD thresholds of significance; therefore, project construction and operations would not increase the frequency or severity of existing air quality violations. Therefore, the proposed project would not contribute to the exceedance of any air pollutant concentration standards.

Concerning the second criterion, SCAG has developed growth forecasts for cities and counties, which are based on General Plans and included in SCAG's *Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS); see Threshold 4.14a below. In turn, the South Coast AQMD uses the SCAG's growth forecasts to develop the 2016 AQMP.

There is no population assumed for the project site under the existing General Plan or SCAG forecasts given the Project site is designated School. However, the proposed project would, based on a forecast of 3.36 person per household, increase the City's population by approximately 377 persons. This increase would represent nominal population growth (only approximately 0.09 percent) over SCAG's forecast population for the City of 416,800 persons for 2045. Therefore, the project would not induce substantial population growth. As such, the proposed project would not interfere with attainment because this growth is nominal and would not conflict with the projections used to formulate the AQMP.

Further, as addressed in the following analysis, total project emissions are less than the South Coast AQMD significance thresholds and localized emissions during construction and operations would not exceed South Coast AQMD LST thresholds; see Thresholds 4.3b and 4.3c below. The project-related emissions increase would not interfere with the AQMP or attainment of ambient air quality standards. Therefore, project emissions would not be greater than those anticipated in the AQMP. As such, the project would be consistent with Criterion No. 2.

The determination of AQMP consistency is primarily concerned with the long-term influence of a project on the Air Basin's air quality. The proposed project would not result in a long-term impact on the region's ability to meet the standards for federal and State air quality. In addition, the proposed project would be consistent with the AQMP goals and policies for the controlling fugitive dust.

Threshold (b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Construction Emissions

Less Than Significant Impact. Both the U.S. Environmental Protection Agency (U.S. EPA) in the NAAQS and CARB in the California CAAQS identifies air quality standards in Southern California. The air quality standards of the following five criteria pollutants relate to development projects: ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and particulate matter (PM_{10} and $PM_{2.5}$). Of these criteria pollutants, the Air Basin, in which Anaheim lies, is designated nonattainment for O_3 and particulate matter, meaning the Air Basin has recorded exceedances of the air quality standards for these pollutants in recent years.[6]

The project's construction activities would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern within the project area include ozone-precursor pollutants (i.e., reactive organic gases [ROG] and nitrogen oxides [NO_X]) and $PM_{10,}$ and $PM_{2.5}$. Construction-generated emissions are short-term and of temporary duration, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated would exceed the South Coast AQMD's thresholds of significance.

[6] A portion of the Air Basin in Los Angeles County is also designated a non-attainment basin for lead, which is not a criteria pollutant that is relevant to this project, since air emissions of lead would not be generated by the project.

Construction equipment would include excavators, dozers, rollers, rubber-tired loaders, tractors, trenchers, and pavers. The basis for exhaust emission factors for typical diesel-powered heavy equipment is the California Emissions Estimator Model (CalEEMod) program defaults. Variables factored into estimating the total construction emissions include the level of activity, length of construction period, number of pieces and types of equipment in use, site characteristics, weather conditions, number of construction personnel, and the amount of materials to be transported on or off the site. The analysis of daily construction emissions has been prepared using CalEEMod.

In accordance with the South Coast AQMD Guidelines, the Consultant used CalEEMod to model construction emissions for ROG, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$. NO_X are a family of highly reactive gases that are a primary precursor to the formation of ground-level O_3 and react in the atmosphere to form acid rain. NO_2 (often used interchangeably with NO_x) is a reddish-brown gas that can cause breathing difficulties at high levels. Peak readings of NO_2 occur in areas that have a high concentration of combustion sources (e.g., motor vehicle engines, power plants, refineries, and other industrial operations). Sulfur oxides (SO_X) belong to the family of sulfur oxide gases that are formed when fuel containing sulfur from coal and oil are burned and during industrial metal smelting processes. SO_2 contributes to respiratory illness, particularly in children and the elderly, and aggravates existing heart and lung diseases.

CalEEMod allows the user to input measures such as watering the construction area to limit fugitive dust. The Consultant input standard conditions into CalEEMod allow for certain reduction credits (i.e. compliance with South Coast AQMD rules) and result in a decrease of pollutant emissions. The basis for reduction credits is studies developed by CARB, South Coast AQMD, and other air quality management districts throughout California, and were programmed within CalEEMod. **Table 4.3-1**: **Construction Emissions** identifies the project's anticipated daily short-term construction emissions, assuming reductions associated with Standard Condition (SC) AQ-1 (Dust Control) and SC AQ-2 (Architectural Coatings). The project would be required to adhere to South Coast AQMD Rules 402 and 403, as part of SC AQ-1 to reduce PM_{10} and $PM_{2.5}$ emissions resulting from fugitive dust and Rule 1113 as part of SC AQ-2 to reduce ROG emissions. As indicated in the table, project construction emissions would not exceed any South Coast AQMD thresholds. Therefore, the project's construction-related impacts would be less than significant for all criteria pollutants.

Table 4.3-1: Construction Emissions

Emissions Source	Pollutant (pounds per day) [a, b]					
	ROG	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
2022	3.23	33.12	20.21	0.05	19.88	11.47
2023	13.03	17.25	21.74	0.05	2.27	1.14
2024	12.89	16.19	21.43	0.05	2.18	1.05
South Coast AQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
South Coast AQMD Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

ROG: reactive organic gases; NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM_{10}: particulate matter 10 microns or less in diameter; $PM_{2.5}$: particulate matter 2.5 microns or less in diameter.

a. The Consultant calculated emissions using the California Emissions Estimator Model (CalEEMod), as recommended by the South Coast AQMD. See **Appendix A**.

b. The modeling incorporates reduction/credits for construction emissions based on measures included in CalEEMod and as required by the South Coast AQMD through Rule 403. This includes the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stockpiles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. The Consultant applied reductions percentages from the South Coast AQMD CEQA Handbook (Tables XI-A through XI-E). The Consultant did not apply any mitigation to construction equipment.

Source: Kimley-Horn, 2021.

Operational Emissions

Less Than Significant Impact. Project-generated operational emissions would be associated with motor vehicle use, energy, and area sources, such as the use of natural gas-fired appliances, landscape maintenance equipment, and architectural coatings. Mobile and stationary (area and energy) source operational emissions would result from normal daily activities on the project site after occupancy. Motor vehicles traveling to and from the project site would generate mobile source emissions. Area source emissions would be generated due to an increased demand for consumer products, architectural coating, and landscaping. The project would generate energy source emissions because of electricity and natural gas (non-hearth) usage associated with the proposed project. The project's primary use of electricity and natural gas would be for space heating and cooling, water heating, ventilation, lighting, appliances, and electronics. **Table 4.3-2: Operational Emissions** summarizes long-term operational emissions attributable to the proposed project a. As shown in Table 4.3-2, the project's long-term operational emissions would not exceed any South Coast AQMD thresholds. Therefore, the project's operational emissions would be less than significant.

Table 4.3-2: Operational Emissions

Emissions Source	Pollutant (pounds per day)					
	ROG	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Area Source	2.90	1.69	9.93	0.01	0.18	0.18
Energy Use	0.06	0.50	0.21	0.003	0.04	0.04
Mobile Source	1.33	2.20	13.70	0.04	4.45	1.21
Total	**4.29**	**4.39**	**23.84**	**0.06**	**4.67**	**1.43**
South Coast AQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
SCA South Coast AQMD QMD Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

ROG: reactive organic gases; NO_X: nitrogen oxides; CO: carbon monoxide; SO_X: sulfur oxides; PM_{10}: particulate matter 10 microns or less in diameter; $PM_{2.5}$: particulate matter 2.5 microns or less in diameter.
Note: The Consultant calculated emissions using the California Emissions Estimator Model (CalEEMod), as recommended by the South Coast AQMD.
Source: Kimley-Horn, 2021.

A significant impact to air quality would occur if a project would result in a cumulative considerable net increase of any criteria pollutant for which the region is non-attainment under an applicable NAAQS or CAAQS (including releasing emissions that exceed quantitative thresholds for ozone precursors). The ozone precursors include ROG and NO_X. The Air Basin is in non-attainment for ozone (State and federal), PM_{10} (State), $PM_{2.5}$ (State and federal), and lead (federal, partial non-attainment in a portion of Los Angeles County). To determine whether the project would result in a cumulatively considerable increase in non-attainment criteria pollutants or exceed the quantitative thresholds for ozone precursors, the Lead Agency may evaluate project emissions based on the quantitative emission thresholds established by the South Coast AQMD in its CEQA Air Quality Handbook (South Coast AQMD 1993, as amended). The South Coast AQMD has established quantitative thresholds against which the Lead Agency may evaluate a project's emissions to determine if there is a potential for a significant impact. In the event direct impacts from a project are less than significant, a project may still have a cumulatively considerable impact on air quality if the emissions from the project, in combination with the emissions from other proposed, or reasonably foreseeable future projects are in excess of screening levels and the project's contribution accounts for more than an insignificant proportion of the cumulative total emissions. As previously, addressed, the proposed project would not result in significant construction or operational air quality affects including non-attainment criteria pollutants. Therefore, the project's contribution to regional pollutant concentrations would not be cumulatively considerable.

Concerning the project's construction-period air quality emissions and cumulative Air Basin conditions, the South Coast AQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to the federal Clean Air Act mandates. As such, the project would be subject to compliance with South Coast AQMD's Rule 403 (see SC AQ-1). Rule 403 requires that construction operations control fugitive dust with the best available control measures to reduce dust such that it does not remain visible in the atmosphere beyond the property line of a project site. Per South Coast AQMD rules and mandates, as well as the CEQA requirement that a project mitigate its significant impacts to the extent feasible, these same requirements (i.e., Rule 403 compliance, implementation of all feasible measures, and compliance with adopted AQMP emissions control measures) would apply to construction projects throughout the Air Basin, which would include related projects. Compliance with South Coast

AQMD rules and regulations would preclude significant construction-related impacts. Therefore, project-related construction emissions, in combination with the emissions from other local projects, would not substantially deteriorate the local air quality.

As previously discussed, the proposed project would not result in long-term air quality impacts, as the operational emissions would not exceed South Coast AQMD thresholds. Additionally, adherence to South Coast AQMD rules and regulations (SC AQ-1 and SC AQ-2) would alleviate potential impacts related to cumulative conditions on a project-by-project basis. South Coast AQMD and other entities are constantly developing emission reduction technology, strategies, and plans. As a result, the proposed project would not contribute a cumulatively considerable net increase of any nonattainment criteria pollutant. Impacts would be less than significant.

Threshold (c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. A significant impact could occur if a project would generate pollutant concentrations to a degree that would significantly affect sensitive receptors, which include populations that are more susceptible to the effects of air pollution than the population at large. This section addresses the exposure of sensitive receptors for the following situations: CO hotspots; localized emissions concentrations, and toxic air contaminants (TACs, specifically diesel PM) from on-site construction.

Carbon Monoxide Hot Spots

An analysis of CO "hot spots" determines whether the change in the level of service (LOS) of an intersection caused by the proposed project would have the potential to result in exceedances of the CAAQS or NAAQS. Vehicle emissions cause CO exceedances, primarily when vehicles are idling at intersections. Vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the CO standard in California is a maximum of 3.4 grams per mile for passenger cars (requirements for certain vehicles are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations have steadily declined. The South Coast AQMD designated the basin as in attainment in 2007 and the South Coast AQMD's AQMP no longer addresses CO hotspots.

Further, the proposed project would not produce the volume of traffic required to generate a CO hotspot. Therefore, CO hotspots are not an environmental impact of concern for the proposed project. Localized air quality impacts related to mobile-source emissions would therefore be less than significant. As a result, no significant impacts would occur, and no additional mitigation measures are required.

Localized Significance Threshold Analysis

Localized Significance Analysis. The Localized Significance Threshold (LST) Methodology provides a look-up table for construction and operational emissions, based on the emission rate, location, and distance from receptors, and provides a methodology for air dispersion modeling to evaluate whether a construction or operation could cause an exceedance of an ambient air quality standard. The Consultant analyzed the local air quality emissions from construction using the South Coast AQMD's Mass Rate Localized Significant Threshold Look-Up Tables and the methodology described in *Localized Significance Threshold Methodology* (South Coast AQMD, revised July 2008) to determine if the project's daily emissions of CO, NO_x, PM_{10}, and $PM_{2.5}$, would result in a significant impact to local air quality. Construction emissions were compared to the South Coast AQMD's screening thresholds. Project implementation would require approximately 6,400 cubic yards (cy) of export soil material. The nearest receptors to the project site are the residences to the north and west (20 feet).

As shown in **Table 4.3-3**: **Localized Significance of Construction and Operational Emissions**, project construction and operational emissions would not exceed South Coast AQMD LSTs. Therefore, the project would not result in significant localized construction or operational emissions.

Table 4.3-3: Localized Significance of Construction and Operational Emissions

	Pollutant (pounds per day)[1]			
Emission Source	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**
Site Preparation (2022)	33.08	19.70	9.34	5.73
Grading (2022)	20.86	15.27	3.75	2.31
Paving (2022)	11.12	14.58	0.57	0.52
Construction (2022)	15.62	16.36	0.81	0.76
Construction (2023)	14.38	16.24	0.70	0.66
Construction (2024)	13.44	16.17	0.61	0.58
Architectural Coating (2023)	1.30	1.81	0.07	0.07
Architectural Coating (2024)	1.22	1.81	0.06	0.06
South Coast AQMD Localized Significance Threshold: (Adjusted for 3.5 acre of daily disturbance at 25 meters)	***164***	***1,165***	***11***	***6***
South Coast AQMD Threshold Exceeded?	**No**	**No**	**No**	**No**
Operations – 2023	2.95	10.14	0.22	0.22
South Coast AQMD Localized Significance Threshold: (5 acres at 25 meters)[2]	***183***	***1,323***	***3***	***2***
South Coast AQMD Threshold Exceeded?	**No**	**No**	**No**	**No**

NO_x: nitrogen oxides; CO: carbon monoxide; SO_x: sulfur oxides; PM_{10}: particulate matter 10 microns or less in diameter; $PM_{2.5}$: particulate matter 2.5 microns or less in diameter.

1. South Coast AQMD Rule 403 Fugitive Dust applied. See Appendix Air Quality/Greenhouse Gas Data.
2. Although the site is 7 acres, the Consultant conservatively used the 5-acre screening lookup threshold as the thresholds increase with size.

Sources: CalEEMod version 2016.3.2 and Kimley-Horn, 2021.

Toxic Air Contaminants

Project construction activities would generate diesel particulate matter (diesel PM) emissions from the use of off-road diesel equipment required for grading and excavation, paving, and other construction activities. The amount to which the receptors are exposed (a function of concentration and duration of exposure) is the primary factor used to determine health risk (i.e., potential exposure to toxic air contaminant emission levels that exceed applicable standards). The South Coast AQMD primarily links health-related risks associated with diesel-exhaust emissions to long-term exposure and the associated risk of contracting cancer.

However, the use of diesel-powered construction equipment would be episodic and would occur in various phases throughout the Project site. Construction is subject to and would comply with California regulations (e.g., California Code of Regulations, Title 13, Division 3, Article 1, Chapter 10, §2485 and 2449), which reduce diesel particulate matter (DPM) and criteria pollutant emissions from in-use off-road diesel-fueled vehicles and limit the idling of heavy-duty construction equipment to no more than five

minutes. These regulations would further reduce nearby sensitive receptors' exposure to temporary and variable DPM emissions.

The Consultant calculated PM_{10} construction emissions rates in grams per second from the annual on-site exhaust emissions reported in CalEEMod. The Consultant converted annual emissions to grams per second and these emissions rates were input into AERMOD. The Consultant calculated risk levels based on the California Office of Environmental Health Hazard Assessment (OEHHA) guidance document, Air Toxics Hot Spots Program Risk Assessment Guidelines (February 2015). **Table 4.3-4**: **Construction Risk** summarizes the results this assessment.

Table 4.3-4: Construction Risk

Exposure Scenario	Pollutant Concentration ($\mu g/m^3$)	Maximum Cancer Risk (Risk per Million)	Chronic Noncancer Hazard	Acute Noncancer Hazard
Construction[1]	0.029	8.51	0.006	0.17
Threshold	*N/A*	*10 in one million*	*1.0*	*1.0*
Threshold Exceeded?	**N/A**	**No**	**No**	**No**

See Appendix A: Modeling Data.

Given the temporary and intermittent nature of construction activities likely to occur within specific locations in the project site (i.e., construction is not likely to occur in any one location for an extended time), the dose of DPM of any one receptor is exposed to would be limited. Additionally, the project site is already disturbed, which further limits the intensity and duration of heavy-duty equipment use during demolition and grading phases. Most of the construction activity (i.e., the construction phase with the longest duration) would occur during the building phase, which uses the least amount of heavy-duty equipment.

Results of this assessment indicate that the maximum concentration of PM_{10} during construction would be 0.029 $\mu g/m^3$. The highest calculated carcinogenic risk from project construction would be 8.51 per million, which would be below the South Coast AQMD threshold of 10 in one million. Non-cancer hazards for DPM would be below the South Coast AQMD threshold of 1.0, with a chronic hazard index computed at 0.006 and an acute hazard index of 0.17. Therefore, construction risk levels would be less than significant.

Even during the most intense month of construction, the project would generate DPM emissions from different locations on the project site rather than in a single location because the various types of construction activities (e.g., site preparation and building construction) would not occur at the same place at the same time. The California Office of Environmental Health Hazard Assessment has not identified short-term health effects from DPM. Construction is temporary and would be transient throughout the site (i.e., move from location to location) and would not generate emissions in a fixed location for an extended period. For these reasons, DPM generated by project construction activities would not expose sensitive receptors to substantial amounts of air toxics. Therefore, project impacts associated with TACs from on-site construction activities would be less than significant and no mitigation is required.

Threshold (d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. The South Coast AQMD CEQA Air Quality Handbook (South Coast AQMD, 1993) identifies certain land uses as sources of odors. These land uses include agriculture, wastewater

treatment plant, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed project is a residential development and does not propose to include any odor-inducing uses on the site.

During construction-related activities, some odors (not substantial pollutant concentrations) that the public may detect are those typical of construction vehicles (e.g., diesel exhaust from grading and construction equipment). These odors are a temporary short-term impact, which are typical of construction projects and disperse rapidly. The project would not include any of the land uses that South Coast AQMD identifies as odor sources. Therefore, impacts would be less than significant and no mitigation is required.

Cumulative Impacts

A project that has a significant impact on air quality concerning PM_{10}, $PM_{2.5}$, NO_x and/or ROGs emissions, as determined above would have a significant cumulative effect. In the event a project's direct impacts are less than significant, a project may still have a cumulatively considerable impact on air quality if the project emissions, in combination with the emissions from other proposed, or reasonably foreseeable future projects are in excess of thresholds, and the project's contribution accounts for more than an insignificant proportion of the cumulative total emissions. Concerning past and present projects, the background ambient air quality includes pollutant concentrations from existing sources. Past and present project impacts are therefore included in the background ambient air quality data. As discussed above, the project's construction and operational emissions would be below the significance thresholds. The project's contribution is not cumulatively considerable.

Standard Conditions and Requirements

SC AQ-1 **Dust Control.** During construction, construction contractors shall comply with South Coast Air Quality Management District's (South Coast AQMD's) Rules 402 and 403 to minimize construction emissions of dust and particulates. South Coast AQMD Rule 402 requires that air pollutant emissions not be a nuisance off site. Rule 402 prohibits the 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.

South Coast AQMD Rule 403 requires that fugitive dust be controlled with Best Available Control Measures so that the presence of such dust does not remain visible beyond the property line of the emission source. This rule is intended to reduce PM_{10} emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. This requirement shall be included as notes on the contractor specifications. Table 1 of Rule 403 lists the Best Available Control Measures that are applicable to all construction projects. The measures include, but are not limited to, the following:

a. Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.

b. All on-site roads will be paved as soon as feasible or watered periodically or chemically stabilized.

c. All material transported off site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.

d. The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.

e. Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down at the end of the workday to remove soil tracked onto the paved surface.

SC AQ-2 **Architectural Coatings.** South Coast Air Quality Management District (South Coast AQMD) Rule 1113 requires manufacturers, distributors, and end-users of architectural and industrial maintenance coatings to reduce reactive organic gas (ROG) emissions from the use of these coatings, primarily by placing limits on the ROG content of various coating categories. Architectural coatings shall be selected so that the volatile organic compound (VOC) content of the coatings is compliant with South Coast AQMD Rule 1113. This requirement shall be included as notes on contractor specifications.

Mitigation Measures

No mitigation measures are required.

4.4 Biological Resources

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

Less Than Significant Impact. The currently vacant project site is in an urbanized area that was previously developed as the Cornelia Connelly School. The project site frontage along Broadway includes landscaping (i.e., a strip of lawn and ornamental trees). On-site vegetation is limited to remnant landscaping along site boundaries, including six eucalyptus trees at the northern property boundary and four Magnolia trees fronting Broadway that the proposed project would retain. No natural habitats are present on the property. Urban development borders the project site, as summarized in Table 2-1. No natural habitats are present on these surrounding areas, and only landscaping including ornamental vegetation is present. Based on review of the existing and surrounding site conditions, no candidate, sensitive, or special-status plant or wildlife species are present on or adjacent to the project site. Therefore, the proposed project would not have an adverse effect on any candidate, sensitive, or special-status plant or wildlife species. A less than significant impact would occur and no mitigation is required.

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

Threshold (c) Would the project have a substantial adverse effect on a 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. There are no riparian habitats or federally protected wetlands or resources on the project site or in its immediate vicinity.[7] The project site does not contain any water resources (e.g., streams, creeks, channels, vernal pools) nor would any of the proposed land uses potentially affect wetlands. The nearest body of water mapped by the U.S Fish and Wildlife Service National Wetlands Inventory is the Riverine habitat located at Dad Miller Golf Course, approximately 0.6 mile north/northwest of the project site. The U.S. Fish and Wildlife Service's National Wetlands Inventory classifies this habitat as Riverine, Intermittent, Streambed, Seasonally Flooded, and Excavated (R4SBCx). The proposed project would not directly or indirectly impact this habitat. The project site is fully developed; the project site does not contain riparian habitat, sensitive natural communities, or wetlands. Therefore, no impact to riparian habitat or wetlands would result from the proposed project and no mitigation is required.

Threshold (d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact. Wildlife movement corridors are physical connections that allow wildlife to move between areas of suitable habitat in both undisturbed and fragmented landscapes. The project site is a vacant former school site, the surrounding properties contain urban uses, and the project site is not a recognized wildlife corridor. The proposed project would remove several large trees located along the

[7] U.S. Fish and Wildlife Service, *National Wetlands Inventory*. www.fws.gov/wetlands/Data/Mapper.html, accessed January 29, 2021.

project site boundary that have the potential to support nesting migratory birds that are protected by the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC). Therefore, the proposed project would adhere to SC BIO-1 pertaining to pre-construction nesting bird surveys and construction scheduling to ensure compliance with the MBTA. Following compliance with SC BIO-1, the proposed project would not interfere with the movement of migratory fish or wildlife species. A less than significant impact would occur and no mitigation is required.

Threshold (e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant Impact. Anaheim Municipal Code §13.12.060 requires that any street tree that is removed shall be replaced if a replacement is deemed possible. The City and/or Applicant shall consult the City's Official Tree Species List and Tree Master Plan to select replacement species. The project does not propose to remove any street tree.

Anaheim Municipal Code §13.12.070 requires any new private development where there is a parkway between the sidewalk and curb to plant street trees. The project proposes to plant trees in the parkway, as depicted in Exhibit 5. Following compliance with the AMC, a less than significant impact would occur and no mitigation is required.

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

No Impact. According to the CDFW's California Regional Conservation Plans map, the project site is within the OCTA Natural Community Conservation Plan (NCCP)/Habitat Conservation Plan (HCP), which covers all of Orange County. The NCCP/HCP's primary goal is to obtain authorization for take of Covered Species under the NCCPA and ESA for implementation of covered freeway improvement projects. The project site is not within the freeway right-of-way and the proposed project does not include freeway improvements. Accordingly, the OCTA NCCP/HCP is not applicable to this proposed project. Therefore, the proposed project would not conflict with an adopted HCP or NCCP. No impact would occur and no mitigation is required.

Cumulative Impacts

Past, present, and reasonably foreseeable future projects are required to implement measures, as set forth in their respective CEQA documents, consistent with federal, State, and local regulations to avoid adverse effects to biological resources or to mitigate for significant impacts to these resources. The types of measures required for projects affecting protected habitat, species, and regulated resources can include avoidance, project design features, regulatory approvals, best management practices, and mitigation measures. Following compliance with the established regulatory framework and standard conditions, the proposed project would not cause a significant impact to biological resources. Therefore, the project would not contribute to a potential cumulatively considerable impact.

Standard Conditions and Requirements

SC BIO-1 **Nesting Migratory Birds.** During construction, grubbing, brushing, or tree removal shall be conducted outside of the state identified nesting season for migratory birds (i.e., typically March 15 through September 1), if possible. If construction activities cannot be conducted outside of nesting season, a Pre-Construction Nesting Bird Survey within and

adjacent to the project site shall be conducted by a qualified biologist within three days prior to initiating construction activities. If active nests are found during the Pre-Construction Nesting Bird Survey, a Nesting Bird Plan (NBP) shall be prepared by a qualified biologist and implemented during construction. At a minimum, the NBP shall include guidelines for addressing active nests, establishing buffers, monitoring, and reporting. The size and location of all buffer zones, if required, shall be based on the nesting species, nesting sage, nest location, its sensitivity to disturbance, and intensity and duration of the disturbance activity.

Mitigation Measures

No mitigation measures are required.

4.5 Cultural Resources

Threshold (a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to in §15064.5?

No Impact. State CEQA Guidelines §15064.5, define "historic resources" as resources listed in the California Register of Historical Resources, or determined to be eligible by the California Historical Resources Commission for listing in the California Register of Historic Resources.[8] CEQA allows local historic resource guidelines to serve as the California Register of Historical Resources criteria if enacted by local legislation to act as the equivalent of the State criteria.

The project site is currently vacant; there are no structures on the site. Because the project site is vacant, the project would not cause a substantial adverse change in the significance of a historical resource. No impact would occur and no mitigation is required.

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

Less Than Significant Impact with Mitigation. The Consultant submitted a records search request on March 3, 2021 to the South-Central Coastal Information Center regarding the project site. The search includes review of all recorded archaeological and built-environment resources, as well as a review of cultural resource reports on file within a one-mile project site radius. Archaeological site locations are not publicly available. The record search noted that no studies had been prepared for the project site and there are six studies for sites within the one-mile radius of the project site. According to the records search, no archaeological resources exist within the project site or a 0.25 mile radius. See **Appendix B: CHRIS Results**.

It is unlikely that archaeological resources are present on the project site, given construction of the former school facilities required site disturbance and excavation. Notwithstanding, project construction would include limited excavation and grading. Therefore, while low, there is the potential for the project to result in an adverse change in the significance of a previously unidentified archaeological resource. The project would be subject to compliance with MM CR-1, which requires that an archaeologist monitor grading and excavation activities. The archaeological monitor could temporarily halt or redirect work to permit the sampling, identification, and evaluation of the artifacts and resources, as appropriate. If resources are significant, the archaeological monitor would determine appropriate actions, in cooperation with the City and Applicant. Compliance with MM CR-1 would reduce potential impacts to a less than significant level.

Threshold (c) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact. No dedicated cemeteries are on or near the project site. The disturbance of most Native American human remains is typically in association with prehistoric archaeological sites. As discussed previously, the project site is not near an identified archaeological resource. Given the extent of on-site disturbances from previous development, there is low potential for the Project's ground-disturbing activities to encounter human remains. Notwithstanding, if previously unknown human remains are discovered during the project's ground-disturbing activities, a substantial adverse change in the significance of such a resource could occur. If human remains are found, those remains would require proper treatment in accordance with applicable laws, including State of California Health and Safety Code

[8] California Public Resources Code §5020.1(k), §5024.1(g).

(HSC) §§7050.5-7055 and PRC §5097.98 and §5097.99. Health and Safety Code §§7050.5-7055 describe the general provisions for treatment of human remains. Specifically, HSC §7050.5 prescribes the requirements for the treatment of any human remains that are accidentally discovered during excavation of a site. HSC §7050.5 also requires that all activities cease immediately, and a qualified archaeologist and Native American monitor be contacted immediately. As required by State law, the proposed project would implement the procedures set forth in PRC §5087.98, including evaluation by the County Coroner and notification of the NAHC. The NAHC would designate the "Most Likely Descendent" of the unearthed human remains. If excavation results in the discovery of human remains, the proposed project would halt excavation near the find and any area that is reasonably suspected to overlay adjacent remains shall remain undisturbed until the County Coroner has investigated, and appropriate recommendations have been made for treatment and disposition of the remains. Following compliance with the established regulatory framework (i.e., HSC §§7050.5-7055 and PRC §5097.98 and §5097.99), the Project's potential impacts concerning human remains would be less than significant and no mitigation is required.

Cumulative Impacts

The project site does not contain historic resources and would result in no impact in this regard; therefore, no cumulative impact would occur. Although the project is not expected to impact any archaeological resources, measures have been identified to mitigate potential impacts to a less than significant level. As with the proposed project, past, current, and future projects would be required to implement mitigation measures to reduce the severity of potential impacts. Despite the site-specific nature of resources, mitigation required for the identification and protection of unknown or undocumented resources would reduce the potential for cumulative impacts. Cumulatively, data recovered from sites in the region allow for the examination and evaluation of the diversity of human activities in the region. The proposed project would not contribute to a cumulatively considerable impact on archaeological resources.

Standard Conditions and Requirements

No standard conditions are applicable to the proposed project.

Mitigation Measures

MM CR-1 Prior to issuance of any permit for ground-disturbing activities, the Applicant shall provide evidence to the City of Anaheim Planning Department that a qualified professional (i.e., archaeologist, historian, architect, paleontologist, Native American Tribal monitor), has been retained. The selection of the qualified professional(s) shall be subject to the City's acceptance. In the event that cultural resources (archaeological, historical, paleontological) are inadvertently unearthed during project excavation and grading activities, the contractor shall immediately cease all earth-disturbing activities within a 100-foot radius of the area of discovery. The qualified professional shall be contacted to evaluate the significance of the finding an appropriate course of action. If avoidance of the resource(s) is not feasible, salvage operation requirements pursuant to State CEQA Guidelines §15064.5 shall be followed. After the find has been appropriately avoided or mitigated, work in the area may resume.

4.6 Energy

Building Energy Conservation Standards

In June 1977, the California Energy Resources Conservation and Development Commission (now the California Energy Commission) adopted energy conservation standards for new residential and non-residential buildings, which the Commission updates every three years (Title 24, Part 6, of the California Code of Regulations). Title 24 requires the design of building shells and building components to conserve energy. The periodic update of these standards allow for consideration and possible incorporation of new energy efficiency technologies and methods. On May 9, 2018, the California Energy Commission (CEC) adopted the 2019 Building Energy Efficiency Standards, which took effect on January 1, 2020.

The 2019 Standards improved upon the previous 2016 Standards for new construction of and additions and alterations to residential and non-residential buildings. The 2019 Standards improved upon the previous 2016 Standards for new construction of and additions and alterations to residential and non-residential buildings. Implementation of the 2019 Title 24 standards result in residential buildings being approximately 7 percent more energy efficient, and when the required rooftop solar is factored in for low-rise residential construction, residential buildings that meet 2019 Title 24 standards would use approximately 53 percent less energy than those built to meet current standards.[9]

Senate Bill 350

In September 2015, then California Governor Jerry Brown signed Senate Bill (SB) 350 (de Leon) into law. This legislation established tiered increases to the Renewable Portfolio Standard: 40 percent by 2024, 45 percent by 2027, and 50 percent by 2030.

Senate Bill 100

On September 10, 2018, Governor Brown signed SB 100 (De Leon). This legislation, referred to as "The 100 Percent Clean Energy Act of 2019," increased the required Renewable Portfolio Standards. Under SB 100, the total kilowatt-hours (kWh)of energy sold by electricity retailers to their end-use customers must consist of at least 50 percent renewable resources by 2026, 60 percent renewable resources by 2030, and 100 percent renewable resources by 2045. SB 100 also establishes a State policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies by December 31, 2045. Under the bill, the State cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Threshold (a) Would the project result in a potentially significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact.

Electricity. Anaheim Public Utilities (APU) provides electricity to the project area. The project's annual energy demand would total 574,000 kWh.[10] Because the project site is vacant, project implementation

[9] California Energy Commission, 2019 Building Energy and Efficiency Standards Frequently Asked Questions Fact Sheet, Available at : https://www.energy.ca.gov/title24/2019standards/documents/2018_Title_24_2019_Building_Standards_FAQ.pdf, Accessed December 20, 2019.

[10] CalEEMod version 2016.3.2.

would result in a permanent increase in electrical demand over existing conditions. APU expects to serve the increased demand from existing APU electrical facilities. According to the City, APU provides an annual total output of 2,760,933 MWh to its customers. Specifically, during fiscal year 2019/2020, residential electricity demand was 578,062 MWh.[11] The project's increase in electricity demand would represent an insignificant percent increase compared to overall demand in APU's service area. Therefore, projected electrical demand would not significantly affect APU's level of service.

In addition, the project design and materials would be subject to compliance with the most current Building Energy Efficiency Standards. Prior to issuance of a building permit, the City of Anaheim Planning and Building Department would review and verify that the project plans comply with the current version of the Building and Energy Efficiency Standards. The project would also be required adhere to CALGreen provisions, which establish planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants.

Project development would not interfere with achievement of the 60 percent Renewable Portfolio Standard set forth in SB 100 for 2030 or the 100 percent standard for 2045. These goals apply to APU and other electricity retailers. As electricity retailers reach these goals, emissions from end user electricity use would decrease from current emission estimates.

Natural Gas. Southern California Gas Company (SoCalGas) provides natural gas service to the project area. The CalEEMod modeling outputs estimates that the project's annual natural gas demand would total approximately 1,976,310 KBtu (0.0019 billion cubic feet [bcf]).[12] SoCalGas would be able to serve the increased demand with the existing SoCalGas facilities. From 2018 to 2035, the California Gas and Electric Utilities anticipates that residential demand will decline from 236 bcf to 186 bcf, while supplies remain constant at 3.775 bcf per day[13] (bcfd) from 2015 through 2035.[14] Therefore, the project's natural gas demand would represent a nominal percentage of overall demand in SoCalGas' service area. The proposed project would not result in a significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

Fuel. During construction, transportation energy use depends on the type and number of trips, vehicle miles traveled, fuel efficiency of vehicles, and travel mode. Transportation energy use during construction would be associated with the transport and use of construction equipment, delivery vehicles and haul trucks, and construction employee vehicles that would use diesel fuel/gasoline. The use of energy resources by these vehicles would fluctuate according to the construction phase and would be temporary. Most construction equipment during demolition and grading would be gas-powered or diesel-powered, and the later construction phases would require electricity-powered equipment. Impacts related to transportation energy use during construction would be temporary and would not require expanded energy supplies or the construction of new infrastructure; impacts would be less than significant.

During operations, energy consumption would be associated with resident, visitor, and employee vehicle trips; delivery and supply trucks; and trips by maintenance and repair crews. The project is near public transportation, further reducing the need to drive. The City and surrounding areas are highly urbanized

[11] City of Anaheim, *Electric Supply,* available at: https://www.anaheim.net/2104/About-Electric-Services, accessed June 8, 2021.

[12] CalEEMod version 2016.3.2.

[13] 1 bcfd is equivalent to about 1.03 billion kBTU

[14] California Gas and Electric Utilities, 2018 California Gas Report, Southern California Gas Company Annual Gas Supply 2018-2035 Table 1-SCG, Accessed March 26, 2021.

with numerous gasoline fuel facilities and infrastructure. Consequently, the proposed project would not result in a substantial demand for energy that would require expanded supplies or the construction of other infrastructure or expansion of existing facilities. Existing rules and regulations concerning vehicle fuel consumption efficiencies would ensure that vehicle trips generated by the proposed project would not be considered as inefficient, wasteful, or unnecessary. Additionally, the proposed project is an infill development and within a low vehicle miles traveled (VMT) area, which would not induce wasteful, inefficient, or unnecessary consumption of energy. The proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Impacts are less than significant and no mitigation is required.

Threshold (b) Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

No Impact. Project design and operation would comply with State Building Energy Efficiency Standards, appliance efficiency regulations, and green building standards. Project development would not cause inefficient, wasteful and unnecessary energy consumption, and no adverse impact would occur. The proposed project would include design features such as high efficiency windows to reduce heating and cooling loads; Energy Star appliances; high efficiency heating and cooling systems to reduce energy consumption, and therefore reduce GHG emissions. Therefore, the project is consistent with AB 32, which aims to decrease emissions statewide to 1990 levels by 2020. Potential impacts are less than significant.

SCAG's Connect SoCal RTP/SCS establishes GHG emissions goals for automobiles and light-duty trucks for 2020 and 2045 as well as an overall GHG target for the project region consistent with both the target date of AB 32 and the post-2020 GHG reduction goals of EOs 5-03-05 and B-30-15. The project is consistent with regional strategies to reduce passenger VMT. As seen in SCAG's 2020 RTP/SCS Exhibit 3.4, the proposed project is proximate to identified job centers in Orange County.

The City has adopted VMT thresholds as required by CEQA and the passage of SB 743. The City's June 2020 Guidelines describe three project screening criteria: (1) transit priority areas screening, (2) low VMT-generating areas screening and (3) project type screening. The June 2020 Guidelines also state that a project only need to fulfill one of the screening types to qualify for screening. Since the proposed project is located in a low VMT-generating area, Transpo Group conducted a review to confirm that the project land use is consistent with the existing land use within the Orange County Transportation Analysis Model (OCTAM). As determined by the VMT Assessment prepared for the project, the proposed project meets the Anaheim VMT screening criteria for a low VMT-generating area and the proposed land use is consistent with the OCTAM existing land use for the project TAZ. Because the project is screened out pursuant to the City's June 2020 Guidelines, the City presumes that the project would result in a less than significant impact concerning VMT.

Increasing residential land uses near major employment centers is a key strategy to reducing regional VMT. Therefore, the project would not conflict with the stated goals of the RTP/SCS. Therefore, the project would not interfere with SCAG's ability to achieve the region's post-2020 mobile source GHG reduction targets outlined in the 2020 RTP/SCS. Potential impacts are less than significant and no mitigation is required.

Standard Conditions and Mitigation Measures

No standard conditions or mitigation measures are required.

4.7 Geology and Soils

The basis for the following information and analysis for Geology and Soils is the *Geotechnical and Infiltration Evaluation* (GeoTek Inc., October 2020) prepared for the proposed project. The report is included in this Initial Study as **Appendix C: Geotechnical and Infiltration Evaluation** and summarized below. Paleontological record search results are included as **Appendix D: Paleo Record Search**.

Threshold (a.i) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving the 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?

No Impact. According to the most recent Alquist-Priolo Fault Zone and Seismic Hazard Zone Map, a known earthquake fault is not located near or known to traverse the project site.[15] Therefore, the project would not directly, or indirectly, cause potential substantial adverse effects involving rupture of a known earthquake fault. No impact would occur and no mitigation is required.

Threshold (a.ii) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Less Than Significant Impact with Mitigation. The City, as well as most of Southern California, is located in a region of historic seismic activity. The nearest zoned fault to the project site is the Lower Elysian Park thrust located approximately 2.6 miles northeast of the project site.[16] Other nearby faults include the Peralta Hills structure located approximately 4.0 miles east and the Newport-Inglewood-Rose Canyon Fault Zone, located approximately 8.5 miles southwest of the project site. During seismic events, the project site could experience moderate ground shaking associated with the faults described above. Strong levels of seismic ground shaking can cause damage to buildings. The intensity of ground shaking on the project site would depend upon the earthquake's magnitude, distance to the epicenter, and geology of the area between the project site and epicenter. The City would impose regulatory controls to address potential seismic hazards through the permitting process. The project would be subject to the current California Building Code (CBC), as adopted by the City's Planning and Building Department, with respect to seismic design parameters. Conformance with these standard engineering practices and design criteria would reduce the effects of seismic ground shaking.

The Geotechnical and Infiltration Evaluation analyzed various geologic and seismic hazards based on site-specific parameters, including strong seismic ground shaking shrinkage, and subsidence). Section 5 of the Geotechnical and Infiltration Evaluation makes recommendations concerning seismic design parameters, foundations, slabs, and general earthwork and grading, among other factors. The Geotechnical and Infiltration Evaluation concludes that the project appears feasible from a geotechnical standpoint. Further, the project would be subject to compliance with MM GEO-1, which requires the City to review all project plans grading, foundation, structural, infrastructure, and all other relevant construction permits relative to the Preliminary Geotechnical Investigation and Code requirements. Compliance with MM

[15] California Geologic Survey. (2018). *Earthquake Zones of Required Investigation Map.* Retrieved from https://maps.conservation.ca.gov/cgs/EQZApp/app/.

[16] United States Geologic Survey. (2021). *U.S. Quaternary Faults.* Retrieved from https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=5a6038b3a1684561a9b0aadf88412fcf.

GEO-1 and applicable regulations would reduce potential impacts related to strong seismic ground shaking to a less than significant level.

Following compliance with standard engineering practices, the established regulatory framework (i.e., AMC and CBC), the Geotechnical and Infiltration Evaluation's recommendations, and MM GEO-1, the project's potential impacts concerning exposure of people or structures to potential adverse effects involving strong seismic ground shaking would be less than significant.

Threshold (a.iii) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Less Than Significant Impact with Mitigation. Liquefaction is a phenomenon where earthquake-induced ground vibrations increase the pore pressure in saturated, granular soils until it is equal to the confining, overburden pressure. When this occurs, the soil can completely lose its shear strength and enter a liquefied state. For liquefaction to occur, a project site must be subject to three factors: underlying loose, coarse-grained (sandy) soils, a groundwater depth of approximately 25 feet, and a potential for seismic shaking from nearby large-magnitude earthquakes.

The project site is located in a Liquefaction Hazard Zone.[17] The Preliminary Geotechnical Investigation noted that minor liquefaction below the project site may occur due to periods of strong seismic ground shaking, with settlement being approximately 0.25 inch over 30 feet. Therefore, the project could directly, or indirectly, cause potential substantial adverse effects involving seismic-related ground failure, including liquefaction.

However, as discussed in Threshold 4.7aii, the Anaheim Planning and Building Department's Building Division would review construction plans to verify compliance with standard engineering practices, the AMC/CBC and the Geotechnical and Infiltration Evaluation's recommendations. Following compliance with standard engineering practices, the established regulatory framework (i.e., AMC and CBC), the Geotechnical and Infiltration Evaluation's recommendations, and MM GEO-1, the project's impacts involving substantial adverse effects, including the risks of loss, or death involving seismic-related ground failure, including liquefaction, would be less than significant.

Threshold (a.iv) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

No Impact. Landslides can occur if ground shaking and/or heavy rainfall disturb areas of steep slopes consisting of unstable soils. The project site is relatively flat and is not located within an Earthquake-Induced Landslide Zone.[18] Further, the Preliminary Geotechnical Investigation noted that there was no evidence of ancient landslides or slope instabilities at the project site. Therefore, the potential for landslides is negligible. Therefore, no impacts related to landslides would occur and no mitigation is required.

[17] California, State of, Department of Conservation. (2016). Earthquake Zone App Retrieved from https://maps.conservation.ca.gov/geologichazards/, Accessed January 27, 2021.

[18] California, State of, Department of Conservation. (2020). CGS Seismic Hazards Program: Landslide Zones Retrieved from https://maps.conservation.ca.gov/geologichazards/, Accessed January 27, 2021.

Threshold (b) Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Surface layers of soil (approximately 2 to 3 feet below the ground surface) consist of undocumented fill comprised of brown, moist silty sand, sandy clay, and sandy silt. Younger alluvial fan deposits are found below the artificial fill and extend to the maximum boring depth of approximately 51.5 feet. Given the site's topography, geology, and historic uses, the potential for loss of topsoil is low. During construction, the proposed project would be required to comply with erosion and siltation control measures outlined in AMC Chapter 17.04: Grading, Excavation, Fills, Watercourses. AMC Chapter 17.04 requires that excavations and fills which may affect drainage and watercourses be performed in accordance with good engineering practice, thereby reducing to a minimum the hazards and damage to public and private property. This would include measures such as sandbagging to reduce project site runoff or hold topsoil in place prior to final grading and construction. Additionally, the proposed project would be subject to compliance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, and all subsequent amendments) (Construction General Permit); see Threshold 4.10a. The Construction General Permit requires development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) and monitoring plan, which must include erosion-control and sediment-control Best Management Practices (BMPs) that would meet or exceed measures required by the Construction General Permit to control potential construction-related pollutants. Following compliance with the established regulatory framework (i.e., the AMC and Construction General Permit), the project's potential impacts concerning soil erosion and loss of topsoil would be less than significant and no mitigation is required.

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

Less Than Significant Impact. The project site would not be subject to seismically induced liquefaction (see Threshold 4.7, aiii above) or landslides (see Threshold 4.7aiv). Subsidence occurs when the withdrawal of groundwater, oil, or natural gas vertically displaces a large portion of land. Soils that are particularly subject to subsidence include those with high silt or clay content. Undocumented artificial fill and younger alluvial fan deposits consisting of brown, moist silty sand, sandy clay, and sandy silt underlie the project site. The soils are slightly moist to moist, and loose/soft to medium dense/stiff to the total depth explored (51.5 feet). No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring, or planned, at the project site or in the general project site vicinity. The Geotechnical and Infiltration Evaluation concluded that subsidence of up to 0.1 foot could occur.

As discussed in Threshold 4.7aii, Chapter 5 of the Preliminary Geotechnical Investigation makes preliminary recommendations concerning design parameters, foundations, slabs, and general earthwork and grading, among other factors. The Anaheim Building Division would review construction plans to verify compliance with standard engineering practices, the AMC/CBC, and the Geotechnical and Infiltration Evaluation's recommendations, including those concerning subsidence. Following compliance with standard engineering practices, the established regulatory framework (i.e., AMC and CBC), and the Geotechnical Evaluation's recommendations, the Project would not be located on a geologic unit or soil that would become unstable and potentially result in subsidence. Therefore, impacts would be less than significant and no mitigation is required.

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

The Geotechnical and Infiltration Evaluation concluded that site soils have low expansion potential. As discussed in Threshold 4.7aii, Preliminary Geotechnical Investigation Chapter 5 makes recommendations concerning design parameters, foundations, slabs, and general earthwork and grading, among other factors. The Anaheim Building Division would review construction plans to verify compliance with standard engineering practices, the AMC/CBC, and the Geotechnical Evaluation's recommendations, including those concerning expansive soils. Following compliance with standard engineering practices, the established regulatory framework (i.e., AMC and CBC), and the Geotechnical Evaluation's recommendations, the project would note create substantial direct or indirect risks to life or property concerning expansive soils. Therefore, impacts would be less than significant and no mitigation is required.

Threshold (e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. Sewers are available for disposal of the project's wastewater. The project would connect to the existing sanitary sewer system for wastewater disposal and would not include the use of septic tanks. Therefore, no impact would occur and no mitigation is required.

Threshold (f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact with Mitigation. Paleontological resources are the fossilized remains of organisms from prehistoric environments found in geologic strata. Silty sand, sandy clay, and sandy silt that exist in loose/soft to medium dense/stiff and slightly moist to moist conditions underlie the project site.[19] These on-site conditions are not conducive to producing paleontological resources. Additionally, previous construction-related excavation on the project site has disturbed sediments beyond depths at which buried prehistoric cultural resources are likely. Although not expected, there is potential for project construction activities to affect unidentified paleontological resources. Therefore, implementation of MM GEO-2, which addresses the actions that the Applicant would take in the event that construction, uncovers paleontological resources. The City will require this mitigation as condition of approval of the proposed project to reduce potential impacts to paleontological resources to a less than significant level.

Cumulative Impacts

The City would require construction of the proposed project to comply with all applicable codes and in accordance with the mitigation set forth in this Initial Study, designed to reduce the exposure of people or structures to substantial risk of loss, injury, or death related to geological conditions or seismic events. The potential cumulative impact related to earth and geology is typically site-specific. The analysis herein determined that the project would not result in any significant impacts related to landform modification, grading, or the destruction of a geologically significant landform or feature with implementation of mitigation. Moreover, existing State and local regulations are in place to protect people and property from

[19] Natural Resources Conservation Service. (2021). *Web Soil Survey.* Retrieved from https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx.

substantial adverse geological and soils effects, including fault rupture, strong seismic ground shaking, seismic-induced ground failure (including liquefaction), and landslides.

Existing laws and regulations also protect people and property from adverse effects related to soil erosion, expansive soils, loss of topsoil, development on an unstable geologic unit or soil type that could result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse. These existing laws and regulations, along with mitigation required for the project, would render potentially adverse geological and soil effects less than significant. These existing laws and regulations also ensure that past, present, and reasonably foreseeable future projects in the region do not result in substantial adverse geological and soils effects. As a result, the existing legal and regulatory framework would ensure that the incremental geological and soils effects of the project would not result in greater adverse cumulative effects when considered together with the effects of other past, present, and reasonably foreseeable future projects in Anaheim and the greater Orange County region. Therefore, the project, in combination with cumulative projects, would not result in a cumulatively significant impact by exposing people or structures to risks related to geologic hazards, soils, or seismic conditions.

Standard Conditions and Requirements

No standard conditions are applicable to the proposed project.

Mitigation Measures

MM GEO-1 Prior to the issuance of grading permits, the City shall review all project plans for grading, foundation, structural, infrastructure, and all other relevant construction permits to ensure compliance with the Geotechnical and Infiltration Evaluation recommendations.

MM GEO-2 Prior to the issuance of the first grading permit or permit for ground disturbance activities, the Applicant shall provide evidence to the City of Anaheim Planning and Building Department that the Applicant has retained a qualified professional paleontologist. The selection of the qualified professional(s) shall be subject to City acceptance. In the event that paleontological are inadvertently unearthed during excavation and grading activities of any future development project, the contractor shall immediately cease all earth-disturbing activities within a 100-foot radius of the area of discovery. The qualified professional shall be contacted to evaluate the significance of the finding an appropriate course of action. If avoidance of the resource(s) is not feasible, the Applicant shall follow salvage operation requirements pursuant to State CEQA Guidelines §15064.5. After the Applicant has appropriately avoided or mitigated the find, work in the area may resume.

4.8 Greenhouse Gas Emissions

The Consultant prepared a greenhouse gas (GHG) emissions analysis (Kimley-Horn, 2021) for the proposed project. The GHG modeling outputs and results are included in **Appendix A: Air Quality/Greenhouse Gas Data** of this Initial Study and summarized below.

Background

The "greenhouse effect" is the natural process that retains heat in the troposphere, the bottom layer of the atmosphere. Without the greenhouse effect, thermal energy would "leak" into space resulting in a much colder and inhospitable planet. With the greenhouse effect, the global average temperature is approximately 61˚F (16˚C). Greenhouse gases (GHGs) are the components of the atmosphere responsible for the greenhouse effect. The amount of heat retained is proportional to the concentration of GHGs in the atmosphere. As human activities and natural sources release more GHGs into the atmosphere, GHG concentrations increase and the atmosphere retains more heat, increasing the effects of climate change. The Kyoto Protocol identified six gases for emission reduction targets: carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFC), perfluorocarbons (PFC), and sulfur hexafluoride (SF_6). When accounting for GHGs, all types of GHG emissions are expressed in terms of CO_2 equivalents (CO_2e) and are typically quantified in metric tons (MT) or million metric tons (MMT).

CO_2, CH_4, and N_2O cause approximately 80 percent of the total heat stored in the atmosphere. Human activities, as well as natural sources, emit these three gases. Each of the GHGs affects climate change at different rates and persists in the atmosphere for varying lengths of time. Global warming potential (GWP) is the relative measure of the potential for a GHG to trap heat in the atmosphere. The GWP allows comparisons of the global warming impacts of different gases. Specifically, it is a measure of how much energy the emissions of one ton of a gas will absorb over a given period, relative to the emissions of one ton of CO_2. The larger the GWP, the more that a given gas warms the Earth compared to CO_2 over that period. GWPs provide a common unit of measure, which allows analysts to add up emissions estimates of different gases (e.g., to compile a national GHG inventory), and allows policymakers to compare emissions reduction opportunities across sectors and gases.

Stationary source combustion of natural gas in equipment such as water heaters, boilers, process heaters, and furnaces emit GHGs, primarily CO_2, CH_4, and N_2O. GHGs also emit from mobile sources such as on-road vehicles and off-road construction equipment burning fuels such as gasoline, diesel, biodiesel, propane, or natural gas (compressed or liquefied). Indirect GHG emissions result from electric power generated elsewhere (i.e., power plants) used to operate process equipment, lighting, and utilities at a facility. Included in GHG quantification is electric power, which is used to pump the water supply (e.g., aqueducts, wells, pipelines) and disposal and decomposition of municipal waste in landfills.[20]

Regulations and Significance Criteria

Former California Governor Arnold Schwarzenegger issued Executive Order S-3-05 in June 2005, which established the following GHG emission reduction targets: (a) by 2010: reduce GHG emissions to 2000 levels; (b) by 2020: reduce GHG emissions to 1990 levels; and (c), by 2050: reduce GHG emissions to 80 percent below 1990 levels.

Assembly Bill (AB) 32 Statutes of 2006, Health and Safety Code §38500 et seq. require that CARB determine what the Statewide GHG emissions level was in 1990 and approve a Statewide GHG emissions

[20] California Air Resources Board, *Climate Change Scoping Plan*, 2008.

limit that is equivalent to that level, to be achieved by 2020. CARB has approved a 2020 emissions limit of 427 million metric tons of CO_2 equivalent ($MTCO_2e$). Additionally, issued in April 2015, Executive Order B-30-15 requires Statewide GHG emissions to be reduced 40 percent below 1990 levels by 2030.

The Governor issued Executive Order B-30-15, in April 2015, which requires statewide GHG emissions to be reduced 40 percent below 1990 levels by 2030. SB 32, signed into law in September 2016, codified the 2030 GHG reduction target in Executive Order B-30-15. SB 32 authorizes CARB to adopt an interim GHG emissions level target for the State to achieve by 2030; and, to adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions. With SB 32, the California Legislature passed companion legislation AB 197, which provided additional direction for developing an updated Scoping Plan. CARB released the second update to the Scoping Plan to reflect the 2030 target set by Executive Order B-30-15 and codified by SB 32 in November 2017.

Due to the nature of global climate change, no single development project would be expected to have a substantial effect on global climate change. GHG emissions from the proposed project would combine with emissions emitted across California, the United States, and the world to contribute cumulatively to global climate change.

Addressing GHG emissions generation impacts requires an agency to determine what constitutes a significant impact. The State CEQA Guidelines specifically allow lead agencies to determine thresholds of significance that illustrate the extent of an impact and are a basis from which to apply mitigation measures. This means that each agency must determine whether a project's GHG emissions would have a "significant" impact on the environment. The guidelines direct that agencies are to use "careful judgment" and "make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" the project's GHG emissions (14 CRC §15064.4(a)).

On September 28, 2010, the South Coast AQMD GHG CEQA Significance Threshold Stakeholder Working Group recommended an interim screening level, numeric, bright-line threshold of 3,000 metric tons of CO_2e annually. In addition, the Working Group recommended an efficiency-based threshold of 4.8 metric tons of CO_2e per service population (residents plus employees) per year in 2020 and 3.0 metric tons of CO_2e per service population per year in 2035. The South Coast AQMD formed the Working Group to assist the South Coast AQMD's efforts to develop a GHG significance threshold. The Working Group included a wide variety of stakeholders including the State Office of Planning and Research (OPR), CARB, the Attorney General's Office, city and county planning departments in the Air Basin, various utilities such as sanitation and power companies throughout the Air Basin, industry groups, and environmental and professional organizations. The Working Group developed the numeric bright line and efficiency-based thresholds to be consistent with CEQA requirements for developing significance thresholds. Substantial evidence supports the recommended thresholds, which provide guidance to CEQA practitioners and lead agencies concerning determining whether GHG emissions from a proposed project are significant.

The City has not adopted project-specific significance thresholds. For the proposed project, the South Coast AQMD's proposed 3,000 $MTCO_2e$/yr non-industrial screening threshold is used as the significance threshold in addition to the qualitative thresholds of significance set forth below from State CEQA Guidelines Appendix G Section VII.

Threshold (a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact. Pursuant to State CEQA Guidelines Appendix G, a project would have a potentially significant impact if it generates GHG emissions, directly or indirectly, that may have a significant impact on the environment; or conflicts with an applicable plan, policy, or regulation adopted to reduce GHG emissions. State CEQA Guidelines §15064.4 specifies how the significance of GHG emissions is to be evaluated. The process is broken down into quantification of project-related GHG emissions, making a determination of significance, and specification of any appropriate mitigation if the analysis finds that impacts are potentially significant.

Project construction and operations would result in direct GHG emissions. Direct project-related GHG emissions include those from construction activities, area sources, and mobile sources, while indirect emissions include those from electricity consumption, water demand, and solid waste generation. The basis for Operational GHG emissions estimates are the energy emissions from natural gas usage and automobile emissions. CalEEMod relies upon trip data; the Consultant used the Traffic Impact Study (Transpo Group, 2020) and project-specific land use data to calculate emissions using CalEEMod. **Table 4.8-1: Project Greenhouse Gas Emissions** presents the project's estimated CO_2, CH_4, and N_2O emissions and indicates construction activities would generate approximately 477.24 $MTCO_2e$ over the course of construction (or 15.91 $MTCO_2e$ amortized over 30 years).[21] Once construction is complete, these construction-related GHG emissions would cease. The analysis quantifies and amortizes construction-related GHG emissions over the life of the project (30 years). Then the analysis adds the amortized construction emissions to the annual average operational emissions.

Table 4.8-1: Project Greenhouse Gas Emissions

Emissions Source	CO_2e (Metric Tons/Year)
Construction Emissions	477.24
Construction Emissions Amortized over 30 Years	15.91
Operational Emissions	
Area Source	24.93
Energy	508.64
Mobile	717.30
Waste	12.95
Water	94.90
Total	**1,359**
South Coast AQMD Threshold	*3,000.00*
South Coast AQMD Threshold Exceeded?	**No**

Note: CalEEMod version 2016.3.2. See Appendix A for Model Data Outputs.
Source: Kimley-Horn, 2021.

[21] The project lifetime is based on the standard 30-year assumption of the South Coast Air Quality Management District (South Coast Air Quality Management District, Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13, August 26, 2009).

Operational emissions consist of area sources, energy sources, mobile sources, solid waste generation, water use, and wastewater treatment. Area source emissions occur from hearths, architectural coatings, landscaping equipment, and consumer products. Energy source emissions are from electricity usage and natural gas consumption. Mobile source emissions are from the project's net new vehicle trips. Emissions from water consumption occur from energy use for conveyance and treatment, and emissions from solid waste occur as materials decompose. The project would generate approximately 1,359 $MTCO_2$/yr of GHG emissions, considering both amortized construction and operational emissions. As indicated in Table 4.8-1, the project's total emissions would not exceed the 3,000 $MTCO_2$eq/year significance threshold. Therefore, the project would not generate GHG emissions, directly or indirectly, that would have a significant impact on the environment. Impacts would be less than significant and no mitigation is required.

Threshold (b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. The City does not have an adopted Climate Action Plan (CAP) or Citywide GHG Reduction Plan applicable to land use development projects. As such, this consistency analysis focuses on the 2017 Scoping Plan, SCAG's Connect SoCal RTP/SCS, SB 32, and Title 24.

The project would be subject to compliance with all building codes in effect at the time of construction, which would include energy conservation measures mandated by Title 24 of the California Building Standards Code – Energy Efficiency Standards. Because Title 24 standards require energy conservation features in new construction (e.g., high- efficiency lighting, high-efficiency heating, ventilating, and air-conditioning (HVAC) systems, thermal insulation, double-glazed windows, water conserving plumbing fixtures), they indirectly regulate and reduce GHG emissions. California's Building Energy Efficiency Standards are updated on an approximately three-year cycle. The most recent 2019 standards went into effect January 1, 2020.

Further, the project would be subject to compliance with the South Coast AQMD's proposed GHG threshold and would not interfere with the State's goals of reducing GHG emission. The project would comply with the City's General Plan policies and State Building Code provisions designed to reduce GHG emissions. Approximately 90 percent of the project's emissions would be from energy and mobile sources, which would be further reduced by 2017 Scoping Plan implementation. In addition, the City has no control over vehicle emissions (approximately 64 percent of the project's total emissions). However, these emissions would decline in the future due to statewide measures including the reduction in the carbon content of fuels, CARB's advanced clean car program, CARB's mobile source strategy, fuel efficiency standards, cleaner technology, and fleet turnover. Additionally, SCAG expects implementation of its RTP/SCS to help California reach its GHG reduction goals, with reductions in per capita transportation emissions of 19 percent 2035.[22] The project is an infill development project near large employment centers, local-serving commercial uses, and several OCTA transit stops, thereby potentially reducing the need to travel long distances.[23] Accordingly, the project would not interfere with the State's efforts to reduce GHG emissions in 2030.

[22] Southern California Association of Governments, *Connect SoCal 2020–2045 RTP/SCS*, September 3, 2020, p. 9.

[23] The California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures* (August 2010) identifies that infill developments, such as the proposed project reduce vehicle miles traveled which reduces fuel consumption. Infill projects such as the proposed project would have an improved location efficiency.

Concerning Executive Order S-3-05 goals for 2050, it is not currently possible to quantify all emissions savings from future regulatory measures because government agencies have not yet developed the measures. Just as the project's GHG emissions would decrease over time from the known regulations that the State would phase in over time, it can be anticipated that project operations would benefit from all applicable measures enacted by State lawmakers to reach the goal of an 80 percent reduction below 1990 levels by 2050. This percentage reduction in the level of GHG emissions that the State's GHG regulators believe the State needs to achieve in order to stabilize GHG-induced temperature increases and limit GHG impacts in California's environment. The basis for the analysis included in this Initial Study is generally the Consultant's knowledge about current GHG emissions regulations and its prediction of GHG impacts, to the extent possible, based on scientific and factual data. Further analysis would be speculative; therefore, in compliance with CEQA, this Initial Study provides no further analysis or conclusions concerning the project's long-term GHG impacts.

In addition, the project would be subject to compliance with applicable building codes and South Coast AQMD rules and regulations during the construction and operational phases, therefore, would not interfere with the State's goals of reducing GHG emissions. Therefore, the project would not conflict with an applicable plan, policy, or regulation (e.g., Title 24, AB 32, and SB 32) adopted to reduce GHG emissions. Impacts would be less than significant and no mitigation is required.

Cumulative Impacts

As addressed in this Initial Study, because of the global nature of the climate change issue, most projects would not generate GHG emissions that individually would cause a significant impact on global climate change. Therefore, the analysis of a project's GHG impacts is typically not considered individually but is analyzed against the GHG emissions of existing and proposed projects within the region, State, and ultimately against global emissions and how the emissions can cumulatively affect global climate change. The various Attorney General, OPR, and South Coast AQMD publications support this concept. The project would not result in a cumulatively considerable impact associated with GHGs.

Standard Conditions and Mitigation Measures

No standard conditions or mitigation measures are required.

4.9 Hazards and Hazardous Materials

The basis for the information provided in this section is the Phase I Environmental Site Assessment (ESA) prepared by Partner (September 2020); the report is included in **Appendix F: Phase I ESA** of this Initial Study.

Regulatory Setting

Various federal, State, and local agencies regulate hazardous materials management. Federal and State agencies include the U.S. EPA, United States Department of Transportation (DOT), California Environmental Protection Agency (Cal EPA), California Department of Toxic Substances (DTSC), California State Water Resources Control Board (SWRCB), Regional Water Quality Control Board (RWQCB), and the California Highway Patrol. Local agencies include the Orange County Fire Authority (OCFA), which regulates hazardous materials use, storage, and disposal within the City.

Existing Site Conditions

The Cornelia Connelly School previously occupied the project site. Historical records show that the property was undeveloped and used as agricultural land up to 1953. By 1963, aerial photographs show the school building already constructed. The school expanded to six buildings in the early 1980s. During site reconnaissance, Partner did not encounter any underground storage tanks (USTs), wells, or septic systems.

Recognized environmental condition (REC) refers to the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property; due to release to the environment; under conditions indicative of release to the environment; or under conditions that pose a material threat of future release to the environment. The Phase I ESA reported no RECs, controlled RECs, or historical RECs associated with the project site. The State Water Resources Control Board GeoTracker database reports a nearby clean up case was identified in association with the La Cantada residential development north of the project site.[24] Remediation occurred and the property owner recorded a deed restriction to control the engineered mitigation controls (i.e. vapor barriers). The case is now closed.

Threshold (a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Project construction would involve the transport, storage, use and/or disposal of limited quantities of hazardous materials, such as fuels, solvents, degreasers, and paints. The use of these materials during project construction would be short-term and would occur in accordance with standard construction practices, as well as with applicable federal, State, and local regulations. Potentially hazardous materials would be contained, stored, and used during construction in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Examples of such activities include fueling and servicing construction equipment, and applying paints and other coatings. Project construction would be temporary, and existing regulations of several agencies would govern these activities. Construction activities would be subject to compliance with relevant regulatory requirements and restrictions concerning the transport, use, or disposal to prevent a significant

[24] State Water Resources Control Board. (2021). *Geotracker*. Retrieved from https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=2323+west+broadway%2C+anaheim%2C+ca.

hazard to the public or environment. The primary regulatory requirements include South Coast AQMD Rule 1166 (volatile organic compound emissions) and Rule 1466 (fugitive dust-toxic air contaminants).

The project proposes the construction of 112, three-story townhomes. The project would not emit hazardous emissions or involve hazardous or acutely hazardous materials, substances, or waste. However, the proposed project could involve the use of materials associated with routine maintenance of the property, such as janitorial supplies for cleaning purposes and/or herbicides and pesticides for landscaping. These uses would not involve the routine transport, use, or disposal of quantities of hazardous materials that could create a significant hazard to the public or environment. The hazardous materials used during operations would be stored, handled, and disposed of in accordance with applicable regulations. At the local level, the OCFA routinely provides inspections to ensure the safe storage, management, and disposal of any hazardous materials in accordance with the federal, State, and local regulations. Therefore, following compliance with the regulatory requirements, the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant and no mitigation is required.

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

Less Than Significant Impact. The project site is vacant and as discussed above, the Phase I ESA reported no RECs, controlled RECs, or historical RECs associated with the project site.

Federal, State, and local laws, regulations and programs address the storage, use, handling, and disposal of any hazardous materials (such as paints and solvents) that the Applicant might use during construction. Compliance with applicable laws and regulations would reduce the risk of hazardous material incidents during construction to a less than significant level. Therefore, project construction activities would not create a significant hazard to the public or to the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

The project would not generate or facilitate the generation of hazardous materials. The proposed project could involve the transport and use of materials associated with routine maintenance of the property, such as janitorial supplies for cleaning purposes and/or herbicides and pesticides for landscaping. However, the types and quantities of materials used and stored on site would not be of a significant quantity to create a reasonable foreseeable upset or accident. Additionally, this analysis assumes that use, storage, and transport of routinely used hazardous materials would occur in compliance with the established regulatory framework. Project operations would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant and no mitigation is required.

Threshold (c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. The school nearest the project site is the Walt Disney Elementary School located at 2323 W. Orange Avenue, approximately 0.22 mile southwest of the project site. However, the project does not propose any uses, which could potentially generate hazardous materials in significant quantities that would have an impact to surrounding schools. Impacts would be less than significant and no mitigation is required.

Threshold (d) Would the project 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 create a significant hazard to the public or the environment?

No Impact. Government Code §65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List, maintained by the DTSC. The Cortese list contains hazardous waste and substance sites including public drinking water wells with detectable levels of contamination; sites with known USTs having a reportable release; and, solid waste disposal facilities from which there is a known migration. The Cortese list also includes hazardous substance sites selected for remedial action; historic Cortese sites; and, sites with known toxic material identified through the abandoned site assessment program. The project would not be located on a site which is included on a hazardous materials site list compiled pursuant to California Government Code §65962.5.[25] Therefore, the project would not create a significant hazard to the public or the environment. No impact would occur, and not mitigation is required.

Threshold (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?

No Impact. The airports located nearest the project site are the Fullerton Municipal Airport located approximately 3.0 miles to the north and Los Alamitos Armed Forces Reserve located approximately 5.3 miles to the southwest. The project site is not within the Airport Influence Areas of these two airports. Therefore, the project would not result in a safety hazard or excessive noise for people working or residing at the project site. No impact would occur and no mitigation is required.

Threshold (f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Project construction activities would not require the complete closure of any public or private streets or roadways. Temporary construction activities would not impede use of the road for emergencies or access for emergency response vehicles.

The City approved its Emergency Operations Plan (EOP) in June 2017. The EOP provides comprehensive policy and guidance for emergency and response operations, and details the responsibilities of residents, organizations, and City-departments. The City uses Anaheim Alert to contact residents immediately during emergencies to provide information regarding evacuations. Impacts would be less than significant and no mitigation is required.

Threshold (g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The California Department of Forestry and Fire Protection (CAL FIRE) has mapped fire threat potential throughout California. CAL FIRE ranks fire threats based on the availability of fuel and the likelihood of an area burning (based on topography, fire history, and climate). The rankings include no fire threat, moderate, high, and very high fire threats. According to CalFire Fire Hazard Severity Zone Map for

[25] California, State of, Department of Toxic Substances Control, DTSC's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List). Available at: http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm. Accessed: February 1, 2021.

Orange County, the project site is not within a State Responsibility Area; it is in a Non-Very High Fire Hazard Severity Zone (Non-VHFHSZ) within a local responsible area.[26] The project site is in a developed urban area and it is not adjacent to or near any wildland areas. Therefore, the project would not expose people or structures to a significant risk involving wildland fires. No impact would occur and no mitigation is required.

Cumulative Impacts

The project would result in less than significant impact regarding hazards and hazardous materials; therefore, no cumulative impact would occur.

Standard Conditions and Mitigation Measures

No standard conditions or mitigation measures are required.

[26] California, State of, Department of Forestry and Fire Protection, *California Fire Hazard Severity Zone Viewer,* Available at: https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414, Accessed February 2, 2021.

4.10 Hydrology and Water Quality

In December 2020, C&V Consulting, Inc. prepared a *Preliminary Water Quality Management Plan* (PWQMP), which it revised in March 2021. The report is **Appendix E: Hydrology Study** and summarized below.

Threshold (a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. Project impacts related to water quality could occur over three different periods:

- During the earthwork and construction phase, where the potential for erosion, siltation, and sedimentation would be the greatest;
- Following construction, before the establishment of ground cover, when the erosion potential may remain relatively high; and
- After project completion, when impacts related to sedimentation would decrease markedly but those associated with urban runoff would increase.

Urban runoff, both dry and wet weather, discharges into storm drains, and in most cases, flows directly to creeks, rivers, lakes, and the ocean. Polluted runoff can have harmful effects on drinking water, recreational water, and wildlife. Urban runoff pollution includes a wide array of environmental, storm water characteristics depend on site conditions (e.g., land use, impervious cover, and pollution prevention practices), rain events (duration, amount of rainfall, intensity, and time between events), soil type and particle sizes, the amount of vehicular traffic, and atmospheric deposition. Major pollutants typically found in runoff from urban areas include sediments, nutrients, oxygen-demanding substances, heavy metals, petroleum hydrocarbons, pathogens, and bacteria. Most urban storm water discharges are non-point sources.

Existing Conditions

The project site is relatively flat, with elevations ranging from approximately 104 feet to 108 feet above mean sea level. In the current condition, the northern and southern parts of the site generally sheet flow overland in westerly and southerly directions, respectively. The northern part of the site drains in a westerly direction towards the existing perimeter walls, which have large knockouts to allow stormwater runoff to continue onto West Transit Avenue. There is an existing six-foot-wide by one-foot-deep concrete channel located on the site along the westerly property line near the site's northwest corner that accepts runoff from the Cantada Square development to the north and conveys runoff to West Transit Avenue and will be maintained as part of this development. The project would not convey any on-site flows to this existing facility.

The southern portion of the site drains in a southerly direction towards the public right-of-way of Broadway. Stormwater runoff entering Broadway continues to flow west into an existing City public 90-inch reinforced concrete storm drainpipe at the intersection of Broadway at Gilbert Street. Stormwater runoff from West Transit Avenue confluences at this location and continues west where it eventually enters the Carbon Creek Channel at Dale Avenue. The Carbon Creek Channel eventually confluences with the San Gabriel River and ultimately outlets into the Pacific Ocean at San Pedro Bay.

Construction

Short-term impacts related to water quality can occur during the earthwork and construction phases when the potential for erosion, siltation, and sedimentation would be the greatest. Additionally, impacts could occur prior to the establishment of ground cover when the erosion potential may remain relatively high. Project construction has activities could produce typical pollutants, such as nutrients, heavy metals, pesticides and herbicides, and chemicals related to construction and cleaning, waste materials, including wash water, paints, wood, paper, concrete, food container, sanitary wastes, fuel, and lubricants. Impacts to storm water quality could occur from construction, and associated earthmoving, and increased pollutant loading.

Construction activity subject to the Construction General Permit for Stormwater Discharge Associated with Construction Activity (Construction General Permit) includes any construction or demolition activity, including, but not limited to, clearing, grading, grubbing, or excavation, or any other activity that results in a land disturbance of equal to or greater than one acre. The project would disturb approximately 6.96 gross acres; therefore, the project would be subject to the Construction General Permit. To obtain coverage under the Construction General Permit, the Applicant is required to file with the State Water Board the Permit Registration Documents (PRDs), which include a Notice of Intent (NOI) and other compliance-related documents. The Construction General Permit requires development and implementation of a SWPPP and monitoring plan, which must include erosion-control and sediment-control BMPs that would meet or exceed measures required by the Construction General Permit to control potential construction-related pollutants. Erosion-control BMPs prevent erosion, whereas sediment controls trap sediment once it has been mobilized. The types of required BMPs are relative to the amount of soil disturbed, the types of pollutants used or stored at the project site, and proximity to water bodies. Additionally, the project would be subject to compliance with AMC §10.09.070, which requires compliance with the Orange County Drainage Area Management Plan (DAMP) and any conditions and requirements established by the City in order to meet federal and State water quality requirements related to stormwater runoff. The DAMP reduces the pollution content of stormwater to the Maximum Extent Practicable (MEP). The purpose of the Orange County DAMP is to satisfy NPDES permit conditions for creating and implementing a Storm Water Management Plan to reduce pollutant discharges to the MEP. The DAMP contains guidelines on structural and nonstructural BMPs for meeting the NPDES goals. BMPs include erosion controls, sediment controls, wind erosion controls, tracking controls, non-storm water management, and waste and materials management. Following compliance with NPDES and AMC requirements, which include implementation of BMPs, the project's construction-related activities would not violate any water quality standards or otherwise substantially degrade surface or groundwater quality. Therefore, impacts would be less than significant and no mitigation is required.

Operations

The Orange County Flood Control District (OCFCD), the County of Orange, and the City of Anaheim along with 25 incorporated cities therein (Permittees) discharge pollutants from their municipal separate storm sewer (drain) systems (MS4s). Stormwater and non-stormwater enter and are conveyed through the MS4s and discharged to Santa Ana Region surface water bodies. These discharges are subject to countywide waste discharge requirements contained in Order No. R8-2010-0062 (NPDES Permit No. CAS618030), Waste Discharge Requirements for the County of Orange, Orange County Flood Control District and the Incorporated Cities of Orange County within the Santa Ana Region Areawide Urban Storm Water Runoff, which was adopted on January 29, 2020.The MS4 Permit Order provides the revised waste discharge requirements for MS4 discharges within the Orange County watersheds, which includes Anaheim. The

MS4 Permit Order supersedes Order No. R8-2009-0030. Orange County uses its Low Impact Development (LID) Ordinance to require that projects comply with NPDES MS4 Permit water quality requirements.

The MS4 Permit Order requires development and implementation of a Water Quality Management Plan (WQMP) for all "New Development" and "Redevelopment" projects subject to the Order. New development and redevelopment projects/activities subject to Orange County's LID requirements include all development projects equal to 1.0 acre or greater of disturbed area; and new development that creates 10,000 square-feet or greater of new impervious surface on a previously undeveloped site. In addition, significant redevelopment that adds or replaces 5,000 square-feet or greater of impervious surface on an already developed site is also subject Orange County's LID requirements. The project involves approximately 6.96 gross-acres of disturbed area; and, the replacement of 10,000 square-feet or more of impervious surface area; as such, the project is subject to Orange County's Model Water Quality Management Program (MWQMP) requirements.

The following is a list of materials anticipated to be used or generated during project operations, which would potentially contribute to pollutants, other than sediment, to stormwater runoff.

- Vehicle fluids, including oil, grease, petroleum, and coolants from personal vehicles;
- Landscaping materials and wastes (topsoil, plant materials, herbicides, fertilizers, mulch, pesticides);
- General trash debris and litter; and
- Pet waste (bacteria/ fecal coliforms).

The project site is currently vacant and 100 percent pervious. In the post-development condition, this analysis assumes that landscaped areas would be approximately 20 percent pervious coverage; therefore, the site would be approximately 80 percent impervious. The Applicant would calculate the actual pervious coverage on landscape plans during final engineering. The proposed drainage pattern would match the site's existing drainage pattern, as previously described.

The project would treat site runoff in accordance with the Orange County's MWQMP Requirements. To do so, the project would need to treat runoff resulting from the 85th percentile rain event, prior to the runoff leaving the site. The project proposes three Drainage Management Areas to collect and convey runoff from landscape, surface and roof drainage to the proposed treatment devices. Pervious coverages located throughout the site would promote impervious area dispersion from roof and sidewalk runoff. Curb inlet basins would collect and convey street surface runoff. A series of area drains and proposed sump curb inlet catch basins within the proposed private drive aisle would collect and convey drainage runoff to three proposed Modular Wetlands System (MWS) Biofiltration vaults for water quality treatment. During larger storm events when the proposed biofiltration BMPs are at capacity, stormwater would pond within the catch basins that overflow through proposed parkway culverts or the existing catch basin in Broadway.

The design of the MWS Biofiltration vaults would provide a three-phase treatment train. When the stormwater initially enters the system, a trash rack, filter media, and settling chamber would capture large trash/debris and sediment in the stormwater before entering the planting media. The design of this system would treat stormwater flow horizontally. Before the stormwater enters the planting or "wetland" chamber, the runoff flows through the second phase, a pre-filter cartridge, which captures fine total suspended solids (TSS), metals, nutrients and bacteria. The pre-filter chamber eliminates additional

maintenance of the planting area. The wetland chamber is the system's third phase of the system, which provides final treatment through a combination of physical, chemical and biological processes.

During larger storm events, stormwater from the northern portion of the site would overflow within the proposed catch basins and be conveyed off the site via proposed parkway drains along the project site's western boundary. For the site's southern portion, when the biofiltration systems are at capacity, stormwater would overflow into a catch basin in Broadway. The project proposes to equip the catch basins with storm drain signage and a catch basin trash rack and/or filter to comply with certified full capture system requirements.

Appendix E Chapter IV.3: LID BMP Selection and Project Conformance Analysis, identifies the project's proposed non-structural BMPs. The source control and treatment BMPs and how each would be implemented to achieve the site design concept. Non-structural BMPs, which consist of educating employees and occupants, developing and implementing HOA guidelines, and implementing BMPs are also proposed. The Project's proposed structural BMPs are summarized Appendix E. Structural BMPs would include storm drain stenciling and signage and efficient irrigation systems.

Hydromodification refers to changes in the magnitude and frequency of stream flows and its associated sediment load due to urbanization or other changes in the watershed land use and hydrology and the resulting impacts on receiving channels, such as erosion, sedimentation, and potentially degradation of in-stream habitat. Due to the increase of impervious surfaces, from 0 to 100 percent, runoff from the project site would increase. However, implementation of stormwater BMPs and on-site MWS would reduce the potential for off-site impacts from increased flows. Implementation of BMPs would address the pollutants of concern associated with a multiple-family residential development.

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

Less Than Significant Impact. The project site's water purveyor is the City, which uses imported water, local groundwater, and recycled water to meet its water needs. The City works with two primary agencies to supply water to the community: the Metropolitan Water District of Southern California (MWD), and the Orange County Water District (OCWD). Imported water supply sources include the Colorado River and the State Water Project provided by MWD. Until the recent past, the City's water supply primarily came from a mixture of groundwater (70 percent) and imported water (30 percent); however, this 70/30 split no longer applies because the City has taken most of its wells offline, as of March 2020. As of April 2021, there are only four active wells, while the remaining wells have been taken offline due to either PFAS (a group of chemicals referred to as per- and polyfluoroalkyl substances) or mechanical issues. Currently, most of the City's water supply comes from imported water. Over the next several years, the City will construct groundwater treatment facilities to treat PFAS.

The Orange County Groundwater Basin (OCGB) is adjudicated; therefore, it is subject to a maximum allowed pumping allocation for groundwater extraction across the basin. Refer to Threshold 4.10e concerning sustainable groundwater management.

The project site sits over the OCGB. Basin recharge occurs through percolation of precipitation and artificial recharge activities at spreading grounds, among other sources. Project implementation would increase the site's effective impervious area. The project is currently vacant and 100 percent pervious. Post-project conditions would alter the project site to 20 percent pervious and 80 percent impervious.

Therefore, the increase in impervious area would reduce the surface area available for groundwater recharge through percolation. However, on-site improvements such as additional landscape areas and biofiltration modular wetland systems would allow for infiltration and retention. As discussed in detail in Threshold 4.10e, OCWD manages groundwater levels within a safe basin operating range to protect the long-term sustainability of the OCGB and to protect against land subsidence. OCWD regulates groundwater levels in the OCGB by regulating the annual amount of pumping, or basin production percentage. The project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project would impede the basins' sustainable groundwater management. Therefore, impacts would be less than significant, and no mitigation is required.

Threshold (c.i.) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?

Threshold (c.ii.) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less Than Significant Impact. The project would not result in a significant change to the site's drainage pattern. The project would not involve the alteration of the course of a stream or river. As previously addressed, the project would follow the site's existing drainage patterns. The project proposes three drainage management areas to collect and convey runoff from landscape areas, surface areas, and roof drainage to the proposed treatment devices. The proposed project would collect and convey surface runoff through curb inlet catch basins that would divert low flows to proposed MWS for water quality treatment. During larger storm events, stormwater from the northern portion of the site would overflow within the proposed catch basins and be conveyed off the site via proposed parkway drains along the project site's western boundary. In the southern part of the site, when the biofiltration systems are at capacity, stormwater would overflow into a catch basin in Broadway. The project proposes to equip the catch basins with storm drain signage and a catch basin trash rack and/or filter to comply with certified full capture system requirements. These flows would follow the existing drainage pattern and connect to existing OCFCD facilities. No flooding would occur on the project site. Impacts would be less than significant and no mitigation is required.

Threshold (c.iii.) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. The City is primarily built out and has an existing storm water drainage system. The proposed project would not substantially alter the existing drainage patterns within the site, while post-project runoff from the site would increase slightly due to the addition of impervious surfaces. However, the hydrology study (Appendix E) has demonstrated that proposed project does not significantly affect the downstream drainage systems by the slight increases in runoff. In compliance with the North Orange County Model WQMP document, runoff from the project site would be treated on site and heavy flows would discharge into existing storm drain facilities. Proposed drainage improvements include

installation of three biofiltration MWS biofiltration vaults within the project site. The proposed project's MWS would have a total volume of 19,112 cubic feet and would provide a combined treatment flow rate greater than the requirements of the North Orange County Model WQMP. Therefore, the project is consistent with the capacity of the City's existing storm drain system and surface water quality requirements. During construction, the construction plans would be reviewed along with supporting hydrology reports and calculations and the project would be required to comply with NPDES requirements, as well as AMC §10.09.070 to ensure that any potential impacts associated with runoff and water quality during grading and project construction would be addressed. Therefore, impacts would be less than significant and no mitigation is required.

Threshold (c.iv.) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

No Impact. The project site is not located within the 100-year hazard flood zone area. Flood Insurance Rate Map (FIRM) 06059C0129J indicates the project site is within Zone X, 0.2 percent change flood; areas with one percent annual change flood with average depths of less than one foot or with drainage areas less than one square-mile; or areas protected by levees from the one percent annual change of flood.[27] Further, the project would use modular wetlands to reduce treat off-site runoff and minimize impacts to existing stormwater drainage facilities. The project site is not subject to flooding and would not impede or redirect flood flows. No impact would occur and no mitigation is required.

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

No Impact. As previously noted, the project site is not located within the 100-year hazard flood zone area. General Plan Safety Element Figures S-6 and S-7 depict flood hazard areas and dam failure inundation areas for Prado Dam, Carbon Canyon Dam, and the Walnut Canyon Reservoir, respectively. Figures S-6 and S-7 indicate the project site is outside of the flood hazard area and the inundation zones zone associated with dam failure.

Tsunamis are sea waves that are generated in response to large-magnitude earthquakes. When these waves reach shorelines, they sometimes produce coastal flooding. Seiches are the oscillation of large bodies of standing water, such as lakes, that can occur in response to ground shaking. The project site is approximately 10 miles northeast of the Pacific Ocean and there are no nearby bodies of standing water.

The project proposes a residential development that would involve only limited use of materials associated with routine property maintenance, such as janitorial supplies for cleaning purposes and/or herbicides and pesticides for landscaping. The project site is not in a flood hazard, tsunami, or seiche zone; and, would not risk the release of pollutants. Therefore, no impact would occur and no mitigation is required.

[27] United States, Federal Emergency Management Agency. *FEMA. Flood Insurance Rate Map 06059C0129J*. Available at https://msc.fema.gov/portal/search?AddressQuery=2323%20West%20Broadway%2C%20Anaheim#searchresultsanchor. Accessed March 26, 2021.

Threshold (e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. As discussed under threshold a), the project would comply with water quality standards and provisions. In 2014, the State adopted the California Sustainable Groundwater Management Act, which provides authority for agencies to develop and implement groundwater sustainability plans or alternative plans that demonstrate the sustainable management of water basins.

The OCWD manages groundwater levels within a safe basin operating range to protect the long-term sustainability of the OCGB and to protect against land subsidence. OCWD regulates groundwater levels in the Basin by regulating the annual amount of pumping, or basin production percentage. The City of Anaheim does not have its own Groundwater Management Plan. Rather, the City's groundwater management falls under the OCWD's Groundwater Management Plan 2015 Update. In 2015, the City pumped 46,937 acre-feet (AF) of groundwater. The UWMP projects groundwater demands to reach 47,000 AF by 2040. In 2015, actual water consumption in the City was 129 gallons per capita per day (gpcd). The project has an estimated water demand of 41,538 gpcd, or 46.5 AF per year. The project's water demand, if solely relied upon from groundwater resources, would represent approximately 0.09 percent of the City's total groundwater demand in 2015. Furthermore, the City would continue to comply with SB X7-7 Requirements, which aim to reduce urban water usage by 20 percent by 2020. Compliance with the Basin Production Percentage allowance set by OCWD and SB X7-7 reduction targets would reduce any project-related impacts on sustainable groundwater management plans. Impacts are less than significant and no mitigation is required.

Cumulative Impacts

The proposed project, in combination with present and reasonably foreseeable future development that would occur within the watershed, would involve construction activities, new development from which runoff would discharge into waterways, potential increased in storm water runoff from new impervious surfaces, and a potential reduction in groundwater recharge areas. Construction of new development within the watershed could result in the erosion of soil, thereby cumulatively affecting water quality within the watershed. In addition, the increase in impermeable surfaces and more intensive land uses within the watershed resulting from future development may also adversely affect water quality by increasing the amount of storm water runoff and common urban contaminants entering the storm drain system. However, new development would be required to comply with existing federal, State, and local regulations regarding construction and operational practices that minimize impacts concerning water quality and stormwater flows. Compliance with requirements would minimize potential impacts at each respective development site. As such, there are no significant cumulative impacts.

Standard Conditions and Mitigation Measures

No standard conditions or mitigation measures are required.

4.11 Land Use and Planning

Threshold (a) Would the project physically divide an established community?

No Impact. Examples of projects that could physically divide an established community include a new freeway or highway that traverse an established neighborhood. The project proposes a townhome development located along Broadway between the signalized intersections of Brookhurst Street to the east and Gilbert Street to the west. The project does not propose any new streets or other physical barriers, which could physically divide an established community. Given its nature and scope, the project would not physically divide an established community. Therefore, no impact would occur and no mitigation is required.

Threshold (b) Would the project 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.

GENERAL PLAN

The General Plan Land Use Plan Map depicts the City's land use designations and designates the project site "School".[28] The School designation identifies existing public and larger, established private schools, including elementary, junior and high schools. Schools designated on the Land Use Plan are either existing facilities or known planned facilities. The project proposes a multiple-family residential development, which would not be consist with the School designation. Therefore, the project requires a General Plan Amendment (GPA2020-00533) to change the land use designation from School to Low-Medium Residential. The Low-Medium Residential designation "…provides for a wide range of residential uses, including detached, small-lot single-family residences, attached single-family residences, patio homes, zero lot line residences, duplexes, townhouses, and mobile home parks." The density range for the Low-Medium Residential land use designation is 0-18 du/ac. The project is consistent with the following General Plan policies:

Land Use Element

Policy 1.1.1 **Character of Anaheim's Neighborhoods:** Actively pursue development standards and design policies to preserve and enhance the quality and character of Anaheim's many neighborhoods.

Policy 1.1.2 **Quality of Life in Neighborhoods:** Ensure that new development is designed in a manner that preserves the quality of life in existing neighborhoods.

Consistency Analysis: The project proposes a contemporary Spanish architectural design with an articulated façade and decorative accents (i.e. gables, tile, and light fixtures). The project includes similar design features and architectural elements that would be consistent with other residential and mixed-use developments in the area. The color schemes would be neutral, with shades of brown, gray, and tan incorporated throughout each elevation. The project's design includes visually appealing finishes to

[28] City of Anaheim. (June 2020). *General Plan Land Use Plan.* Retrieved from http://www.anaheim.net/DocumentCenter/View/9519/Z0-GeneralPlan_24x55_Map?bidId=.

promote consistency with the City's development standards and design policies. Therefore, the project would be consistent with or otherwise would not conflict with these policies.

Policy 2.1.1 **Vacant and Infill Development:** Facilitate new residential development on vacant or underutilized infill parcels.

Consistency Analysis: The project involves development 112 townhome units on a vacant parcel in an urbanized portion of the City. Therefore, the proposed project would be consistent with or otherwise would not conflict with this policy.

Policy 2.1.5 **Employment-Rich & Transit Accessible Housing:** Encourage a mix of quality housing opportunities in employment-rich and transit-accessible locations.

Policy 5.1.4 **Development with a Variety of Transportation Options:** Promote development that is efficient, pedestrian-friendly, and served by a variety of transportation options.

Consistency Analysis: The project is approximately two miles away from the I-5 freeway ramp and served by multiple transit stops within a 0.50-mile radius, including stops on Brookhurst Street, Broadway, and Lincoln Avenue. The transit stop nearest the project site is approximately 0.25 mile to the east and the second nearest transit stop is approximately 0.35 mile to the northwest. The Applicant proposes to connect internal pedestrian walkways with the existing public sidewalk at Broadway to increase accessibility to the development. Further, a Class II bikeway runs near the project site from Broadway to Dale Avenue, as identified in the Anaheim Bicycle Master Plan (May 23, 2017). Accordingly, various transportation options would serve the proposed project. Therefore, the project would be consistent with or otherwise would not conflict with these policies.

Policy 7.1.1 **Jobs/Housing Balance:** Address the jobs-housing balance through the development of housing in proximity to local job centers.

The project would provide housing near local job centers. Two of the City's top employers, the Disneyland Resort and the City of Anaheim, are located within four miles of the project site. There are also various retail uses along Lincoln Avenue and Magnolia Avenue, as well as business parks and other employment opportunities to future residents throughout the City. Savanna High School is less than one mile northwest of the project site. Therefore, the proposed project would be consistent with or otherwise would not conflict with this policy.

Policy 14.1.2 **Existing Residential Neighborhoods Livability:** Ensure that new development does not compromise the livability of existing residential neighborhoods.

Consistency Analysis: The project uses would be similar to the surrounding area and design styles are consistent with nearby developments. The project would provide amenities and on-site parking for residents to limit disturbance to surrounding communities. Therefore, the project would be consistent with or otherwise would not conflict with this policy.

Community Design Element

Policy 3.1.3 **Compatible New and Infill Development:** Require new and infill development to be of compatible scale, materials, and massing as existing development.

Consistency Analysis: The project would include design features complementary in type, form, scale, and character with surrounding developments. The recreation club fronting Broadway would replicate the Cornelia Connelly School's heritage through its architecture design. Specifically, the recreation building would incorporate design elements such as the school's façade and prevalent louver element designs. Therefore, the project would be consistent with or otherwise would not conflict with this policy.

Policy 4.1.6 **Provide usable common open space amenities.** Common open space should be centrally located and contain amenities such as seating, shade and play equipment. Private open space may include courtyards, balconies, patios, terraces and enclosed play areas

Consistency Analysis: The project would include common landscape areas in front of residential buildings and a community recreation club. As conceptually proposed, the clubhouse area would include a swimming pool and spa, built-in barbeque area, shade structures, seating areas, equipment building, restroom, and showers. Project amenities would be accessible to all residents and centrally located on the site. Further, the project would exceed the RM-3 Multiple-Family Residential Zone common open space requirements. Therefore, the project would be consistent with or otherwise would not conflict with this policy.

Housing Element

Housing Quality and Design Strategy 3E: Community Design. Ensure quality design of future residential projects.

Consistency Analysis: The project includes architectural design features with design features and color palettes similar to nearby residential and mixed-use developments. The project would be consistent with the Housing Element. The project would be consistent with or otherwise would not conflict with this strategy.

As demonstrated above, the project would be consistent with or otherwise would not conflict with applicable General Plan policies. The City's Regional Housing Needs Assessment (RHNA) for the 6th Cycle planning period identifies the City's future housing need of 17,411 units. The project would provide for 112 townhomes in furtherance of the Housing Element's by assisting the City in meeting its housing needs. Therefore, the project would not conflict with any land use plan, policy, or regulation adopted to mitigate an environmental effect. Impacts would be less than significant and no mitigation is required.

ZONING CODE

The City of Anaheim Zoning Map depicts the City's zoning and indicates the project site is within the "T" Transition Zone.[29] The T Zone "…includes land that is used for agricultural uses, in transitory or interim use, restricted to limited uses because of special conditions, or not zoned to one of the zoning districts in this title for whatever reason, including recent annexation." Development standards for the T Zone are in AMC Chapter 18.14 (Public and Special Purpose Zone). The project proposes a multiple-family residential development, which the Code prohibits in the T Zone. Therefore, the project requires a Reclassification (RCL2020-00335) from the T Zone to the "RM-3" Multiple-Family Residential Zone. The RM-3 Multiple-Family Residential Zone "…provides attractive, safe and healthy environment with multiple-family units with a minimum building site area per dwelling unit of two thousand four hundred (2,400) square feet." Development standards for the RM-3 Multiple-Family Residential Zone are in AMC Chapter 18.06

[29] City of Anaheim. (July 2020). *Zoning Map.* Retrieved from https://www.anaheim.net/DocumentCenter/View/1871/Zoning-Map?bidId=.

(Multiple Family Residential Zones). The RM-3 Zone implements the General Plan Low-Medium Residential land use designation

The minimum lot area per dwelling unit for the RM-3 Multiple-Family Residential Zone is 2,400 square-feet/du. The proposed project would develop 112 townhomes on an approximate 6.96-acre (303,000 square-feet) site. Accordingly, the project contains approximately 2,700 square-feet lot area per dwelling unit and meets the City's minimum lot area requirement for the RM-3 Multiple-Family Residential Zone. As discussed above, the maximum permitted density in the RM-3 Multiple-Family Residential Zone is 0-18 du/ac. The project would have a density of approximately 17.25 du/ac, which would be below the maximum allowable density in the RM-3 Multiple-Family Residential Zone.

Additionally, the project would be subject to the RM-3 Multiple-Family Residential Zone's regulations specified in AMC Chapter 18.06 concerning the following key development standards: Lot Width, Structural Height, Minimum Floor Area, Site Coverage, Structural Setbacks, Recreation Leisure and Storage Area, Landscaping, Fencing, and Parking. The City's review of the project for consistency with the AMC has determined the project would comply with all relevant development standards, except setbacks between proposed buildings within the project site, which are subject to the approval of a Conditional Use Permit.

Following the City's approval of the requested entitlements (i.e., General Plan Amendment, Zoning Map Amendment (Reclassification), Tentative Tract Map, and Conditional Use Permit), the project would not conflict with the General Plan or AMC. Impacts would be less than significant and no mitigation is required.

Cumulative Impacts

Project implementation would require a General Plan Amendment and Reclassification. The proposed project is consistent with the General Plan policies and all potential environmental impacts associated with land use would be less than significant. City growth would be subject to review for consistency with adopted land use plans and policies by the City, in accordance with the requirements of CEQA, State Zoning and Planning Law, and the State Subdivision Map Act, all of which require findings of plan and policy consistency prior to approval of entitlements for development. Therefore, no significant cumulative impacts associated with plans and policies would occur.

Standard Conditions and Mitigation Measures

No standard conditions or mitigation measures are required.

4.12 Mineral Resources

Threshold (a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Threshold (b) Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. The project site is vacant and was previously the site of the Cornelia Connelly School; therefore, the project site is not historically or currently a site for mineral recovery. General Plan Figure 5.9-1, Mineral Resources Map, does not identify any known State or locally designated mineral resources or locally important mineral resource recovery site on the project site. Therefore, there would be no loss of a known mineral resource with project implementation. No impact would occur and no mitigation is required.

Cumulative Impacts

No impacts to mineral resources would result from the proposed project. As a result, no cumulative impacts related to mineral resources would occur.

Standard Conditions and Mitigation Measures

No standard conditions or mitigation measures are required.

4.13 Noise

The Consultant prepares a noise analysis (Kimley-Horn, 2021) for the proposed project. The noise modeling is included in **Appendix G: Noise Data** of this Initial Study and summarized below. The analysis describes sound in terms of amplitude (loudness) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (dB). The decibel scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is in relation to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, the A-weighted decibel scale (dBA) relates noise to human sensitivity. The A-weighted decibel scale provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise, on the other hand, is unwanted sound. A typical noise environment consists of a base of steady ambient noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These can vary from an occasional aircraft or train passing by to virtually continuous noise from traffic on a major highway.

Several rating scales analyze the adverse effect of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise on people is largely dependent on the total acoustical energy content of the noise as well as the time of day when the noise occurs. For example, the equivalent continuous sound level (L_{eq}) is the acoustic energy content of noise for a stated period; therefore, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. The Day-Night Sound level (L_{dn}) is a 24-hour average L_{eq} with a 10 dBA "weighting" added to noise during the hours of 10:00 PM to 7:00 AM to account for noise sensitivity in the nighttime. The Community Noise Equivalent Level (CNEL) is a 24-hour average L_{eq} with a 10 dBA weighting added to noise during the hours of 10:00 PM to 7:00 AM and an additional 5 dBA weighting during the hours of 7:00 PM to 10:00 PM to account for noise sensitivity in the evening and nighttime.

Existing Setting

The project site is vacant, and the surrounding area is predominantly residential; see Table 2-1. Mobile noise sources, especially cars and trucks, are the most common and significant sources of noise in the project area. Most of the existing mobile noise in the project area is from vehicles along surrounding roadways including Broadway. The primary sources of stationary noise are urban activities (i.e., mechanical equipment, parking areas, and pedestrians). The noise associated with these sources may represent a single-event noise occurrence, short-term or long-term/continuous noise.

Noise-Sensitive Receptors. Noise-sensitive receptors are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as, places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Additional land uses such as parks, historic sites, cemeteries, and recreation areas are also sensitive to increases in exterior noise levels. Schools, churches, hotels, libraries, and other places where low interior noise levels are essential are additional noise-sensitive land uses. Noise-sensitive receptors (i.e., single- and multiple-family residential uses) surround the project site. Additionally, Walt Disney Elementary School is to the southwest of the project site. The nearest noise-sensitive receptors are the single-family residential uses to the north (20 feet), south (170 feet), and west (20 feet); and the multiple-family residential uses to the east (80 feet).

Noise Measurements. The Consultant took noise level measurements near the project site to establish current baseline noise levels. The Consultant took ten-minute measurements between 1:20 PM and 2:20 PM. Short-term (L_{eq}) measurements are representative of the noise levels throughout the day. These measurements were taken during off-peak traffic hours to characterize baseline noise levels without exposure to heavy traffic or noise-generating activities. As identified in **Table 4.13-1**: **Noise Measurements,** the measured noise levels range between 50.7 dBA L_{eq} and 64.1 dBA L_{eq}.

Table 4.13-1: Noise Measurements

Site Number	Description	L_{eq}	L_{min}	L_{max}	Time
1	2331 W. Transit Avenue	55.2	39.2	72.5	1:21 PM
2	2341 W. Mall Avenue	50.7	42.5	64.6	1:41 PM
3	1301 S. Rosebay Street	56.2	41.3	66.2	1:58 PM
4	2235 W. Broadway	64.1	46.9	80.8	2:19 PM

L_{eq}: equivalent noise level; L_{min}: minimum noise level; L_{max}: maximum noise level
Source: Noise measurements conducted by Kimley-Horn, 2021.

Transportation-related noise associated with the arterial transportation network, and background noise from land use activities, dominates the background ambient noise levels in the project study area . Meteorological conditions were clear skies, warm temperatures with light wind speeds (6.2 miles per hour) and low humidity. Noise monitoring equipment used for the ambient noise survey was a Larson Davis LxT Type I sound level meter. The monitoring equipment complies with applicable requirements of the American National Standards Institute (ANSI) for Type I sound level meters.

Regulatory Setting

California Code of Regulations, Title 24. The California Code of Regulations, Title 24: Part 1, Building Standards Administrative Code, and Part 2, California Building Code codifies the State's noise insulation standards. These noise standards apply to new construction in California for the purpose of interior noise compatibility from exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residential buildings, schools, or hospitals, are located near major transportation noise sources, and where such noise sources create an exterior noise level of 65 dBA CNEL or higher. Acoustical studies that accompany building plans must demonstrate that the design of the structure would limit interior noise in habitable rooms to acceptable noise levels. For new residential buildings, schools, and hospitals, the acceptable interior noise limit for new construction is 45 dBA CNEL.

City of Anaheim General Plan. The General Plan Noise Element contains noise and land use compatibility standards for various land uses throughout the City; see **Table 4.13-2***:* **Anaheim Noise and Land Use Compatibility**. The City uses these standards and criteria in the land use planning process to reduce future noise and land use incompatibilities. The standards shown in Table 4.13-2 are the primary tool that allows the City to ensure integrated planning for compatibility between land uses and outdoor noise.

Table 4.13-2: Noise and Land Use Compatibility

Land Use Category	CNEL, dBA[1]						
	50	55	60	65	70	75	80
Residential-Low Density Single-family, Duplex, Mobile Homes							
Residential – Multiple Family							
Transient Lodging – Motels, Hotels							
Schools, Libraries, Churches, Hospitals, Nursing Homes							
Auditoriums, Concert Halls, Amphitheaters							
Sports Arenas, Outdoor Spectator Sports							
Playgrounds, Neighborhood Parks							
Golf Courses, Riding Stables, Water Recreation, Cemeteries							
Office Buildings, Businesses, Commercial and Professional							
Industrial, Manufacturing, Utilities, Agriculture							

Normally Acceptable: Specified land use is satisfactory based on the assumption that any buildings involved are of conventional construction, without special noise insulation requirements.

Conditionally Acceptable: New construction should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice. Outdoor environment will seem noisy.

Normally Unacceptable: New construction should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made with needed noise insulation features included in the design. Outdoor areas must be shielded.

Clearly Unacceptable: New construction or development should generally not be undertaken. Construction costs to make the indoor environment acceptable would be prohibitive and the outdoor environment would not be usable.

Source: *City of Anaheim General Plan*, Figure N-2: Land Use Compatibility for Community Noise Exposure (Exterior), May 2004.

The Noise Element also contains the State of California interior and exterior noise standards for various land uses; see **Table 4.13-3: Interior and Exterior Noise Standards**.

Table 4.13-3: Interior and Exterior Noise Standards

Land Use		CNEL (dBA)	
Categories	**Uses**	**Interior[1]**	**Exterior[2]**
Residential	Single-and multiple-family, duplex	45[3]	65
	Mobile Homes	-	65[4]
Commercial	Hotel, motel, transient housing	45	-
	Commercial retail, bank, restaurant	55	-
	Office building, research and development, professional offices	50	-
	Amphitheater, concert hall, auditorium, movie theater	45	-
	Gymnasium	50	-
	Sports Club	55	-
	Manufacturing, warehousing, wholesale, utilities	65	-
	Movie Theaters	45	-
Institutional/Public	Hospital, school classrooms/playgrounds	45	65
	Church, library	45	-
Open Space	Parks	-	65

1. Indoor environment excluding bathrooms, kitchens, toilets, closets, and corridors.
2. Outdoor environment limited to private yard of single-family dwellings, multiple-family private patios or balconies accessed from within the dwelling (balconies 6 feet deep or less are exempt), mobile home parks, park picnic areas, school playgrounds, hospital patios.
3. Noise level requirement with closed windows, mechanical ventilation or other means of natural ventilation shall be provided as per Chapter 12, §1205 of the Uniform Building Code.
4. Exterior noise levels should be such that interior noise levels will not exceed 45 dBA CNEL.

Source: City of Anaheim, *City of Anaheim General Plan*, Table N-3: State of California Interior and Exterior Noise Standards, May 2004.

City of Anaheim Municipal Code: Chapter 6.70, Sound Pressure Levels. Anaheim Municipal Code §6.70.0110 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. Anaheim Municipal Code §6.70.010 also exempts certain noise sources from the provisions of this code, including traffic sounds, sound created by emergency activities, and construction or building repair of any premises during the hours of 7:00 AM to 7:00 PM.

City of Anaheim Municipal Code: AMC §18.40.090, Sound Attenuation for Residential Developments. Anaheim Municipal Code §6.70.0110 (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 located within 600 feet of any railroad, freeway, expressway, major arterial, primary arterial or secondary arterial, as designated by the General Plan Circulation Element. A noise level analysis is required for any new residential development or subdivision

that meets these criteria, which must include mitigation measures that would be required to comply with applicable City noise standards including, but not limited to, the following:

- 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 Uniform Building Code, as adopted by the City (identified in AMC §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 (identified in AMC §18.40.090).

Anaheim Municipal Code §18.040.090.060 specifies that 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;[30] and
- Measures to attenuate noise to the prescribed levels would compromise or conflict with the aesthetic value of the project.

Threshold (a) Would the project result in the 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 ordinances, or applicable standards of other agencies?

Less Than Significant Impact with Mitigation.

Construction. Construction noise represents a short-term impact on ambient noise levels. Noise generated by equipment for demolition and construction equipment, including trucks, graders, bulldozers, concrete mixers and portable generators can reach high levels. Construction activities on the project site would expose existing noise-sensitive uses to increased noise levels. In typical construction projects such as the proposed project, the loudest noise generally occurs during demolition and grading activities because they involve the largest equipment. **Table 4.13-4: Maximum Noise Levels Generated by Construction Equipment** shows the maximum noise levels generated by construction equipment. It is noted that the noise levels identified in Table 4.13-4 are maximum sound levels (L_{max}), which are the highest individual sound occurring at an individual time period. Operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be due to random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts).

[30] The deviation from prescribed levels does not pertain to interior noise levels.

Table 4.13-4: Maximum Noise Levels Generated by Construction Equipment			
	Typical Noise Level (dBA)		
Equipment	Acoustical Use Factor	L_{max} at 20 Feet (dBA)	L_{max} at 50 Feet (dBA)
Crane	16	96	88
Concrete Mixer Truck	40	93	85
Backhoe	40	88	80
Dozer	40	93	85
Paver	50	97	89
Roller	20	82	74
Water Truck	40	96	88
Grader	40	93	85
Compactor	40	90	82

dBA: A-weighted decibels; L_{max}: maximum noise level
Note: Acoustical Use Factor (percent): Estimates the fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition) during a construction operation.
Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.

Noise-sensitive uses surrounding the project site include single-family residences to the north (20 feet), south (170 feet), and west (20 feet); and multiple-family residences to the east (80 feet). The proposed project may expose these sensitive receptors to elevated noise levels during project construction. However, the proposed project would generally disperse construction noise acoustically throughout the project site and it would not be concentrated in one area near surrounding sensitive uses.

The noise levels calculated in **Table 4.13-5: Project Construction Noise Levels**, show the project's estimated exterior construction noise levels without accounting for attenuation from existing physical barriers. This analysis assumes that all construction equipment would operate simultaneously at a construction area nearest to the sensitive receptor. These assumptions represent a worst-case noise scenario, as the proposed project would spread construction activities throughout the construction site further away from noise sensitive receptors.

Table 4.13-5: Project Construction Noise Levels		
	Modeled Exterior Construction Level at Nearest Sensitive Receptor	
Construction Phase	dBA L_{eq}	dBA L_{max}
Site Preparation	73.6	70.0
Grading	73.3	71.0
Paving	72.5	75.5
Construction	75.4	71.0
Painting/Architectural Coating	N/A	66.0

Source: See Appendix G: Noise Data for construction noise modeling assumptions and results.

As shown in Table 4.13-5, unobstructed construction noise levels could reach 75.4 dBA at the property line of the nearest sensitive receptor. Construction equipment would operate throughout the Project site during each phase and the associated noise levels would not occur at a fixed location for extended periods. The proposed project will disperse construction noise throughout the project site and roadway noise will mask much of the construction noise.

The City's Noise Ordinance does not establish quantitative construction noise standards. The FTA has established a daytime threshold of 90 dBA L_{eq} (1 hour) for residential uses 100 dBA L_{eq} (1 hour) for non-residential uses to evaluate construction noise impacts.[31] As shown in Table 4.13-5, noise levels at the sensitive receptors would be below 90 dBA. The highest anticipated construction noise level of 75.4 dBA would occur during the construction phase. Anaheim Municipal Code §6.70.010 exempts construction activities from the City's noise standards between the hours of 7:00 AM and 7:00 PM. It is also noted that construction noise would be acoustically dispersed throughout the project site and not concentrated in one area near surrounding sensitive uses, and the proposed project would be required to comply with AMC §6.70.010. Implementation of MM N-1 would further minimize impacts from construction noise, as it requires construction equipment to be equipped with properly operating and maintained mufflers and other State required noise attenuation devices. Implementation of SC N-1 and MM N-1 would mitigate construction-related noise impacts to a less than significant level.

Operation. Typical noise sources associated with residential land uses include children playing, pets, amplified music, mechanical equipment, parking lots, traffic, trash/recycling collection, and landscaping equipment.

Mechanical Equipment. Mechanical equipment (e.g., heating, ventilation, and air conditioning [HVAC] equipment) typically generates noise levels of approximately 52 dBA at 50 feet.[32] Sound levels decrease by 6 dBA for each doubling of distance from the source.[33] The nearest noise-sensitive receptor would be approximately 25 feet from the closest potential proposed living area of the site. At 25 feet, mechanical equipment noise levels would be 58 dBA. However, the mechanical equipment would be roof mounted, centrally located, shielded by parapets, and more than 70 feet from the nearest noise-sensitive receptor. Therefore, the noise level would be below the City's 60 dBA exterior noise standard set forth in AMC §6.70.0110. The project would not place mechanical equipment near residential uses, and noise from this equipment would not be perceptible at the nearest noise-sensitive receptor. Impacts from mechanical equipment would be less than significant.

Parking Lot Noise. Traffic associated with parking lots is typically not of sufficient volume to exceed community noise standards, based on a time-averaged scale such as the CNEL scale. The instantaneous maximum sound levels generated by the slamming of a car door, starting an engine starting up, and car pass-bys, range from 53 to 61 dBA[34] and may be an annoyance to adjacent noise-sensitive receptors. Conversations in parking areas may also be an annoyance to adjacent noise-sensitive receptors. Sound

[31] Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, Table 7-2, Page 179, September 2018.

[32] Elliott H. Berger, Rick Neitzel1, and Cynthia A. Kladden. (2010). *Noise Navigator Sound Level Database with Over 1700 Measurement Values*.

[33] Cyril M. Harris, *Noise Control in Buildings*, 1994.

[34] Kariel, H. G., *Noise in Rural Recreational Environments*, Canadian Acoustics 19(5), 3-10, 1991.

levels of speech typically range from 33 dBA at 50 feet for normal speech to 50 dBA at 50 feet for very loud speech.[35]

Parking lot noise would occur within at surface parking areas throughout the proposed residential community. As noted above, noise levels from parking lot activities typically range from approximately 53 to 61 dBA at a distance of 50 feet. However, parking lot noise would be well below the City's noise standards when averaged over time. An existing 6.0-foot masonry perimeter wall would also separate the parking areas from adjacent noise-sensitive receptors. According to the FHWA Roadway Construction Noise Model User's Guide (January 2006), a solid barrier would reduce noise levels by at least 5 dBA. The nearest parking spaces would be approximately 35 feet from the nearest noise-sensitive receptors. Therefore, parking lot noise levels would be reduced to 59 dBA and would not exceed the City's 60 dBA noise standard. In addition, the adjacent multiple-family apartment development generates its own parking lot noise. Therefore, noise impacts from parking lots would be less than significant.

Off-Site Mobile Noise. Project implementation would generate increased traffic volumes along nearby roadways. According to the project traffic analysis, the average daily traffic volume on Broadway is approximately 14,000, which corresponds to a Conditionally Acceptable traffic noise level of approximately 63.5 dBA CNEL[36] for single-family and multiple-family residential uses. The noise measurements taken on Broadway recorded a noise level of 64.1 L_{eq}. The proposed project would generate an additional 366 net daily trips. Inclusive of the proposed project, the average daily traffic volume on Broadway would be approximately 14,366, which would correspond to a Conditionally Acceptable traffic noise level of approximately 63.6 dBA CNEL for single-family and multiple-family residential uses.[37] As such, the project would result in an unnoticeable traffic noise increase[38] and traffic noise levels would remain Conditionally Acceptable for single-family and multiple-family residential uses along Broadway. Therefore, the project's off-site traffic noise levels would be less than significant.

Trash/Recycling Collection Noise. The project would require trash/recycling collection. Trash/recycling trucks would access the project site from Broadway. Low speed truck noise results from a combination of engine, exhaust, and tire noise, as well as the intermittent sounds of back-up alarms and releases of compressed air associated with truck air brakes. As such, trash/recycling pickup trucks could generate noticeable noise levels at nearby receptors. However, trash/recycling collection activities currently occur at adjacent uses and are essential to the project area. Further, trash/recycling pickup noise would be short-term and intermittent and would be partially masked by background traffic noise along Broadway. This analysis anticipates that actual noise levels over time resulting from trash/recycling collection activities would be below the City's noise standards. Therefore, noise impacts associated with trash/recycling collection would be less than significant.

Landscaping Equipment. The project would include the use of landscaping equipment such as lawnmowers and leaf blowers throughout the site, which can generate noise levels between

35 Elliott H. Berger, Rick Neitzel1, and Cynthia A. Kladden. (2010). *Noise Navigator Sound Level Database with Over 1700 Measurement Values*.

36 Calculated using the Federal Highway Administration's *Highway Noise Prediction Model (FHWA-RD-77-108) with California Vehicle Noise (CALVENO) Emission Levels*; see Appendix E.

37 Ibid.

38 According to the Federal Highway Administration, a traffic noise increase of 3 dBA is barely perceptible to people, while a 5-dBA increase is readily noticeable (https://www.fhwa.dot.gov/environMent/noise/regulations_and_guidance/polguide/polguide02.cfm).

approximately 76 dBA and 88 dBA at one meter assuming a clear line of sight from source to receiver.[39] The nearest off-site noise-sensitive uses (residences 20 feet north of the project site) would be within approximately 20 feet of operating landscaping equipment. Although landscaping equipment noise levels could exceed the City's 60 dBA and 65 dBA CNEL noise limits, the use of this equipment would be temporary and take place during normal daytime hours. In addition, surrounding uses have noise generated from landscaping equipment under existing conditions. Therefore, landscaping equipment would not generate noise levels above ambient conditions and impacts would be less than significant and no mitigation is required.

Threshold (b) Would the project result in the generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. Project construction can generate varying degrees of groundborne vibration, depending on the construction procedure and the construction equipment used. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located near the construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Ground-borne vibrations from construction activities rarely reach levels that damage structures.

The Federal Transit Administration (FTA) has published standard vibration velocities for construction equipment operations. In general, the FTA architectural damage criterion for continuous vibrations (i.e., 0.20 inch/second) appears to be conservative. The types of construction vibration impact include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods. Building damage can be cosmetic or structural. **Table 4.13-6: Typical Vibration Levels for Construction Equipment** identifies typical vibration levels produced by construction equipment.

Table 4.13-6: Typical Vibration Levels for Construction Equipment

Equipment	Approximate Peak Particle Velocity at 25 Feet (inches/second)	Approximate Peak Particle Velocity at 20 Feet (inches/second)
Large bulldozer	0.089	0.124
Loaded trucks	0.076	0.106
Small bulldozer	0.003	0.004
Jackhammer	0.035	0.049
Vibratory compactor/roller	0.210	0.293

1. Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018. Table 7-4.
2. Calculated using the following formula:

$PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$

where: PPV (equip) = the peak particle velocity in in/sec of the equipment adjusted for the distance
PPV (ref) = the reference vibration level in in/sec from Table 7-4 of the FTA *Transit Noise and Vibration Impact Assessment Manual,* September 2018.
D = the distance from the equipment to the receiver

[39] Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden, *Noise Navigator Sound Level Database with Over 1700 Measurement Values*, June 26, 2015.

Ground-borne vibration decreases rapidly with distance. The project would not require pile driving. As indicated in the Table 4.13-6, based on the FTA data, vibration velocities from typical heavy construction equipment operations that the Applicant would use, during project construction, range from 0.003 to 0.210 inch-per-second PPV at 25 feet from the source of activity. At 20 feet (at the nearest structure), construction equipment vibration levels would range from 0.004 to 0.293 inches-per-second PPV, which would be below the 0.5 inch-per-second PPV structural damage threshold and the 0.4 inch-per-second PPV human annoyance threshold. Impacts would be less than significant and no mitigation is required.

Threshold (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 airports nearest the project site are the Fullerton Municipal Airport located approximately 3.0 miles to the north and Los Alamitos Armed Forces Reserve located approximately 5.3 miles to the southwest. The project site is not within the Airport Influence Areas of these two airports. Project implementation would not result in exposure of people residing or working in the project area to excessive noise levels. Therefore, no impact would occur and no mitigation is required.

Cumulative Impacts

As discussed above, the proposed project can mitigate all construction and operational noise affects to a less than significant level. Construction noise impacts are by nature localized. The separation distance between the proposed project and other related projects would be such that the temporary noise and vibration effects from the proposed project would not compound or increase similar noise or vibration effects from other related projects. As discussed above, operational noise caused by the proposed project would be less than significant. Due to site distance and intervening structures and land uses, cumulative stationary noise impacts would not occur. No known past, present, or reasonably foreseeable projects would compound or increase the project's operational noise levels. Therefore, cumulative impacts relative to temporary and permanent noise generation associated with the proposed project would be less than significant.

Standard Conditions and Requirements

No standard conditions are applicable to the proposed project.

Mitigation Measures

MM N-1 The Applicant shall ensure through contract specifications that construction best management practices (BMPs) are implemented by contractors to reduce construction noise levels. Contract specifications shall be included in construction documents, which the City shall review prior to issuance of any grading or building permit. The construction BMPs shall include the following:

- Ensure that construction equipment is properly muffled according to industry standards and be in good working condition.
- Place noise-generating construction equipment and locate construction staging areas away from sensitive uses, where feasible.
- Use electric air compressors and similar power tools rather than diesel equipment, where feasible.

- Turn-off construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, when not in use for more than 5 minutes.
- Clearly post construction hours, allowable workdays, and the phone number of the job superintendent at all construction entrances to allow for surrounding owners and residents to contact the job superintendent. If the City or the job superintendent receives a complaint, the superintendent shall investigate, take appropriate corrective action, and report the action taken to the reporting party.

4.14 Population and Housing

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

Less Than Significant Impact. The California Department of Finance (CDOF) reports the City's estimated population is 357,325 persons as of January 1, 2020, with an estimated 3.36 person per household.[40] The project proposes a townhome development consisting of 112 du. Assuming 3.36 persons per household and 112 dwelling units, the project would generate a population increase of approximately 377 persons, which represents nominal population growth (approximately 0.11 percent) over the City's existing population of 357,325 persons. Additionally, the project would increase the City's housing stock by 112 du. The City's Regional Housing Needs Assessment (RHNA) for the 6th Cycle planning period identifies the City's future housing need of 17,411 units. The project would contribute to the future housing need for the 6th Cycle planning period.

SCAG has developed growth forecasts for cities and counties, which it bases on General Plans. SCAG included these growth forecasts in its Connect SoCal 2020-2045 RTP/SCS. SCAG forecasts the City's population will increase to 416,800 persons and 122,700 households by 2045.[41] There is no population assumed for the project site under the existing General Plan or SCAG forecasts given the project site is designated School. However, the analysis determined that the forecasted population increase for the proposed project would be approximately 377 persons would represent nominal population growth (only approximately 0.09 percent) over SCAG's forecast population for the City of 416,800 persons for 2045. Therefore, the project would not induce substantial population growth in the City directly by proposed new housing. Additionally, the project would not induce unplanned population growth in the City directly by proposing new businesses or indirectly through extension of roads or other infrastructure to unserved areas. Therefore, a less than significant impact would occur concerning population growth.

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

No Impact. The project site is vacant; therefore, the project would not displace people or housing. No impact would occur and no mitigation is required.

Cumulative Impacts

The project would be consistent with the City's growth projections, as concluded above. Additional development in the City would be subject to review for consistency with the adopted General Plan, in accordance with CEQA requirements. Therefore, no significant cumulative impacts associated with population and housing would occur.

Standard Conditions and Mitigation Measures

No standard conditions or mitigation measures are required.

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40 California, State of, Department of Finance. *E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011-2020*. Available at http://dof.ca.gov/Forecasting/Demographics/Estimates/E-5/., Accessed February 1, 2021.

41 Southern California Association of Governments. *Adopted Final Connect SoCal 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy*. Available at https://scag.ca.gov/read-plan-adopted-final-plan. Accessed February 1, 2021.

4.15 Public Services

Threshold (a.i) 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 fire protection?

Less Than Significant Impact. The City of Anaheim Fire and Rescue Department provides fire protection services to the project site. The Fire and Rescue Department operates 12 fire stations and employs 209 sworn fire personnel.[42] It staffs 12 engine companies including 10 designated paramedic companies, 5 truck companies, 1 contract paramedic company, 1 hazardous materials unit, 1 technical rescue unit, and 2 Battalions. The fire stations nearest the project site are Anaheim Fire Station #4, at 2736 West Orange Avenue, approximately 1.4 miles southwest of the project site, and Anaheim Fire Station #2, at 2141 West Crescent Avenue, approximately 1.7 miles northeast of the project site.

The population growth that the analysis forecasted for the project would incrementally increase the demand for fire protection and emergency medical services to the project site. However, the forecast population growth and increased demand for services would not exceed General Plan population projections and anticipated public service needs. The project would be required to comply with applicable building and fire codes and pay the appropriate impact fees in effect at the time of issuance of building, to offset any incremental demand in calls for service. The project does not propose, and would not create a need for, new/physically altered fire protection facilities to maintain acceptable service ratios/response times. Therefore, the project would not result in adverse physical impacts associated with such facilities. Given the project's nature and scope, a less than significant impact would occur concerning fire protection facilities and no mitigation is required.

Threshold (a.ii) 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 police protection?

Less Than Significant Impact. The Anaheim Police Department provides police protection and law enforcement services to the City. The Police Department provides emergency police response, non-emergency police response, routine police patrol, traffic violation enforcement, traffic accident investigation, animal control, and parking code enforcement. The Police Department headquarters are located at 425 S. Harbor Boulevard, approximately 2.8 miles east of the project site. The Police Department operates 4 police stations and employs 409 sworn police personnel.[43] The ratio of sworn police officers is approximately 1.14 officers per 1,000 population.

The population growth that the analysis forecasted for the project would incrementally increase the demand for police protection services to the project site. However, the forecast population growth and increased demand for services would not exceed General Plan population projections and anticipated public service needs. The Police Department would review the proposed project during the plan check

[42] City of Anaheim. 2019. *Anaheim Fiscal Year 2020-2021 Adopted Budget.* Available at https://www.anaheim.net/DocumentCenter/View/32083/20-21-Proposed-Budget-Book, Accessed February 15, 2021.

[43] Anaheim Police Department. (2021). Command Staff. Retrieved from https://www.anaheim.net/172/Command-Staff.

process to ensure that adequate lighting, safety and security features are included in the proposed project design. The project does not propose, and would not create a need for, new/physically altered police protection facilities to maintain acceptable service ratios/response times. Therefore, the project would not result in adverse physical impacts associated with such facilities. Given the project's nature and scope, a less than significant impact would occur concerning fire protection facilities and no mitigation is required.

Threshold (a.iii) 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 schools?

Less Than Significant Impact. The project site is within the Magnolia School District (MSD) (Pre-K – 6th) and Anaheim Unified High School District (AUHSD) (6^{th} – 12^{th}) boundaries. The schools serving the project site and their current capacities are identified in **Table 4.15-1**: **Schools Serving Project Site.**

Table 4.15-1: Schools Serving Project Site

School District	Schools	Grades	2019-2020 Enrollment
Magnolia School District	Juliette Low School of the Arts 1800 Ball Rd, Anaheim	K-6	511
Anaheim Unified High School District	Brookhurst Junior High School 601 N Brookhurst Ave, Anaheim	7-8	1,081
	Savanna High School 301 N Gilbert St, Anaheim	9-12	1,806
Total			**3,398**

Source: California Department of Education, Dataquest- Enrollment Reports, https://dq.cde.ca.gov/dataquest/, Accessed February 19, 2021

Table 4.15-2: Project Student Generation provides the project's forecast student population growth based on City-adopted student generation rates.

Table 4.15-2: Project Student Generation

Grades	Student Generation Rate	Students
K-6	0.116	13
7-8	0.013	2
9-12	0.032	4
Total		**19**

Source: The Planning Center. (2004). Anaheim General Plan and Zoning Code Update EIR.

As indicated in Table 4.15-2, the project would generate approximately 15 new students to the MSD and approximately 4 new students to the AUHSD. The forecasted student population growth would incrementally increase the demand for school facilities/services. However, the project would be subject to payment of school impact fees in accordance with SB 50. As of April 2021, residential development

school impact fees are $2.04 per square foot for multiple-family residential.[44] The AUHSD would collect the fees on behalf of MSD. Pursuant to Government Code §65995(h), "The payment or satisfaction of a fee, charge, or other requirement levied or imposed …are hereby deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization …on the provision of adequate school facilities." The Applicant would pay developer fees in compliance with the established regulatory framework to support provision of adequate school services.

Due to the project site's distance from schools, project construction activities would not disrupt school services within the project vicinity. Additionally, the project does not propose, and would not create a need for new or physically altered school facilities to maintain acceptable service ratios/standards. Therefore, the project would not result in adverse physical impacts associated with such facilities. Given the project's nature and scope, a less than significant impact would occur concerning schools.

Threshold (a.iv) 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 parks?

Less Than Significant Impact. See **Section 4.16: Recreation**.

Threshold (a.v) 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 other public facilities?

Less Than Significant Impact. The Anaheim Public Library system has 159,809 square-feet of library space across various facilities, a bookmobile, and 621,114 collection items as noted in **Table 4.15-3**: **City of Anaheim Library Facilities**. Population growth affects online resources because the basis for licensing fees for these databases, eBooks, and other digital resources are generally the library service area's population. With additional residents to serve, the proposed project would reduce the overall per capita availability of books, media, computers, and library public service space. Therefore, to maintain current per capita levels and licensing agreements, the City would need to provide additional physical and virtual resources to the Anaheim Public Library system. The threshold for determining impacts pursuant to CEQA is based upon whether a 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, to maintain acceptable service ratios or other performance objectives. The impacts to the overall per capita availability 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 is required.

[44] Anaheim Union Unified School District, *Personal Communication with Leticia Hauck – Facilities Planning Assistant*, February 19, 2021.

Table 4.15-3: City of Anaheim Library Facilities			
Anaheim Public Library	**Address**	**Building Size (square-feet)**	**Driving Distance to Project Site (miles)**
Central Library	500 W. Broadway	67,500	4.0
Haskett Branch	**2650 W. Broadway**	**23,673**	**0.9**
Euclid Branch	1340 S. Euclid St	10,672	3.7
Sunkist Branch	901 S. Sunkist St	10,622	9.0
Canyon Hills Branch	400 S. Scout Trail	18,000	13.8
East Anaheim Branch	8201 E. Santa Ana Canyon Rd	10,546	16.2
Ponderosa Joint-Use Branch	240 E. Orangewood Ave	3,500	8.0
Heritage Services (Archival Research Outlet)	241 S. Anaheim Blvd	5,289	5.6
Founders Park (Historic Experience Center)	400 N. West St	10,007	4.9
Bookmobile	Various locations	0	N/A
Books-on-the-go at ARTIC	2626 East Katella Ave	0	8.8
Virtual Branch Services (obtain e-books through Library website)	Online	0	N/A
Total		**159,809**	**—**
Source: David Taussig & Associates, Inc. Sept. 2017. *City of Anaheim Development Impact Fee Justification Study.*			

Cumulative Impacts

The provision of public services and facilities takes into consideration a larger service area than is associated with a project site. Therefore, the study area is the service area for the respective agencies and districts. Through coordination with the public services and facilities providers, the area's cumulative needs are considered. The project does not cause the need to construct any new or expand any existing facilities. Therefore, the project would not result in incremental environmental effects to public services or facilities that could be compounded or increased when considered together with similar effects from other past, present, and reasonably foreseeable probable future projects. The project would not result in cumulatively considerable impacts to public services or facilities.

Standard Conditions and Mitigation Measures

No standard conditions or mitigation measures are required.

4.16 Recreation

Quimby Act

The Quimby Act of 1975, (California Government Code §66477), commonly called the "Quimby Act", allows a city or county to pass an ordinance that requires, as a condition of approval of a subdivision, either the dedication of land, the payment of a fee in lieu of dedication, or a combination of both for park and recreational purposes. It allows a city or county to require a maximum parkland dedication standard of 3 acres of parkland per 1,000 residents for new subdivision development unless the jurisdiction can demonstrate that the amount of existing neighborhood and community parkland exceeds that limit. In accordance with §66477, a jurisdiction may establish a parkland dedication standard based on its existing parkland ratio, provided required dedications do not exceed 5 acres per 1,000 persons.

Would the project:

Threshold (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?

Threshold (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. General Plan Green Element Figure G-1 classifies the project site as a Public School surrounded by Park Deficiency Areas. Per AMC §18.06.100, the project's proposed RM-3 Multiple-Family Residential Zone requires 350 square-feet/du of recreational-leisure area. The proposed project would include 112 townhomes that would require 39,200 square-feet of recreational-leisure area space. The proposed project would include approximately 65,840 square-feet (587.8 square-feet per townhouse) of common recreational-leisure, which would exceed the RM-3 Multiple-Family Residential Zone minimum requirements. The project's open space and recreational facilities would provide recreational opportunities to future residents rather than relying solely on the City's existing public park system. As conceptually proposed, the clubhouse area would include a swimming pool and spa, built-in barbeque area, shade structures, seating areas, equipment building, restroom, and showers., as well as common landscape areas in front of residential buildings. The forecasted population growth for the proposed project of 377 persons would have a nominal impact on the demand of recreational facilities. Further, the project is a residential development and therefore would be subject to Park Impact Fees as required by AMC §17.34.010.

The project does not propose, and would not require construction or expansion of public recreational facilities. Therefore, the project would not result in adverse physical impacts associated with such facilities. A less than significant impact would occur and no mitigation is required.

Cumulative Impacts

The proposed project would not result in a significant increased use of recreational facilities or require construction or expansion of existing recreational facilities. Therefore, no cumulative impacts on recreational facilities would result from project implementation.

Standard Conditions and Mitigation Measures

No standard conditions or mitigation measures are required.

4.17 Transportation

Information in this section is based on the *VMT Assessment* (November 2020) prepared by Transpo Group for the proposed project, included in **Appendix H: VMT Assessment and Traffic Impact Study** of this Initial Study and summarized below.

Site Access

Regional access to the site is from SR-91 from the north, I-5 from the northeast, and SR-39 (Beach Boulevard) from the west.

Broadway is a four-lane undivided roadway, which borders the project site to the south. In the project area, Broadway has signalized intersections with Brookhurst Street and Gilbert Street. The Circulation Element of the General Plan classifies Broadway as a Secondary Arterial.

Brookhurst Street is a seven-lane undivided roadway, east of the project site. The Circulation Element of the General Plan classifies Brookhurst Street as a Major Arterial.

Gilbert Street is a two-lane undivided roadway, west of the project site. The Circulation Element of the General Plan classifies Gilbert Street as a Collector.

Threshold (a) Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less Than Significant Impact.

Project Construction Trip Generation

Automobile and truck traffic volumes associated with project-related construction activities would vary throughout the construction phases, as different activities occur. However, project-related construction traffic would be temporary and cease upon project completion.

Project Operations Trip Generation

Transpo Group estimated daily and peak hour trips for the proposed project and displaced land use (i.e., school) based on the Institute of Transportation Engineers (ITE) *Trip Generation Manual* (10th Edition) trip rates for the following uses:

- Multifamily Housing (Mid-Rise)
- Private High School

Table 4.17-1 provides the trip generation rates and the project's net estimated trip generation after accounting for the displaced land use. The project would generate an estimated 366 average daily vehicle trips, including -24 average daily trips in the morning peak hour and +32 average daily trips in the evening peak hour.

Table 4.17-1: Project Trip Generation

Land Use	Quantity	Unit	Trip Generation Estimates						
			Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Multifamily Housing (Mid-Rise)[1]	112	DU	610	9	29	38	31	18	49
Private High School[2]	120	Students	244	42	20	62	8	9	17
Total Net New Project Trips			**366**	**-33**	**9**	**-24**	**23**	**9**	**32**

1. Estimated weekday vehicle trip generation based on Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition Multifamily Housing (Mid-Rise) land use 221 equation trip rates.
2. Estimated weekday vehicle trip generation based on Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition Private High School land use 530 average trip rates.

Source: Transpo Group, 2021.

Existing average daily traffic volumes (ADT) along Broadway are 14,200 ADT east of Rosebay Street and 13,700 ADT west of Rosebay Street in the project area.[45] The capacity of Broadway is 25,000 ADT. The net increase of 366 daily trips generated represents a nominal increase in ADT on Broadway and would be accommodated by the existing roadway infrastructure.

Public Transit

Upon project implementation, public transit bus service would continue to be provided by the OCTA, with bus routes along Brookhurst Street. The nearest transit stop is Brookhurst-Broadway, located at the intersection of Broadway at Brookhurst Street, approximately a 0.25-mile (or 5- to 6-minute walk) east of the project site. The transit stop is part of OCTA Route 35, which runs from Fullerton to Costa Mesa along Brookhurst Street. The route operates Monday through Saturday, with peak hour headways of approximately 45 minutes. The second nearest transit stop to the project site is Lincoln-Gilbert, approximately 0.35-mile to the northwest at the intersection of Lincoln Avenue at Gilbert Street. This transit stop is part of OCTA Route 42/42A, which runs from the City of Seal Beach to the City of Orange with peak hour headways of approximately 30 minutes. The proximity of the project site to these bus stops would provide near access to transit service for project residents.

Bicycle facilities within the project area include an existing Class II bike lane along Brookhurst Street. Further, as discussed in the City's Bike Master Plan, Class II bike lanes are proposed along Broadway, Gilbert Street (north of Broadway), and Lincoln Avenue, and Class III bike lanes are proposed along Gilbert Street (south of Broadway) and Orange Avenue in the project area.[46] Project implementation would not result in impacts to existing bicycle facilities or conflict with proposed improvements.

There are existing sidewalks along Broadway, Brookhurst Street, and other roadways in the project area. The project would maintain pedestrian sidewalks throughout the project area and sidewalks along Broadway would connect to internal walkways to provide access to the project site. Accordingly, project

[45] City of Anaheim. (2020). *Average Daily Traffic Volume Table.* Available at: https://anaheim.net/DocumentCenter/View/368/Average-Daily-Traffic-Volume-Table-PDF?bidId=. Accessed on March 29, 2021.

[46] City of Anaheim (2021). *Anaheim Existing and Planned Bikeways.* Available at: https://anaheim.maps.arcgis.com/apps/View/index.html?appid=f8b43cf542324de2baac76aad0558bd3. Accessed on March 29, 2021.

implementation would not affect existing pedestrian facilities. Therefore, project construction and operations would not conflict with an applicable plan, ordinance, or policy concerning the circulation system. Impacts would be less than significant impact and no mitigation is required.

Threshold (b) Would the project conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?

Less Than Significant Impact. The City of Anaheim adopted Vehicle Miles Travelled (VMT) thresholds as required by CEQA and pursuant to SB 743. The City's June 2020 Guidelines describe three project screening criteria: (1) transit priority areas screening, (2) low VMT-generating areas screening and (3) project type screening. The City's June 2020 Guidelines state that a project only needs to fulfill one of the screening types to qualify for screening. According to the project-specific VMT assessment prepared for the proposed project, the project site is located in a low VMT-generating. A review was conducted to confirm that the project land use is consistent with the existing land use in the Orange County Transportation Analysis Model (OCTAM). As determined by the project's VMT Assessment (see Appendix H), the proposed land use is consistent with the OCTAM existing land use for the project Traffic Analysis Zone (TAZ). The proposed project is a residential use and is within a low VMT-generating area; therefore, the proposed project is screened from further VMT analysis. Based on the proposed project's Low VMT screening and consistency with OCTAM modeling, as referenced in Appendix H, the proposed project would result in a less than significant transportation impact based on the VMT methodology and no mitigation is required.

Threshold (c) Would the project 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 proposed project would relocate the existing driveway access on Broadway 90 feet to the west access to the project site. The driveway entrance would be a 32-foot-wide, split driveway with an eight-foot-wide median landscape area. The driveway would provide full access onto Broadway. Within the residential development, drive aisles would be 28 feet. All drive aisles would accommodate standard fire lane turning radiuses and hammerhead turnaround maneuvers for emergency vehicles and fire services. The construction of the project driveway and internal circulation improvements would be pursuant to City Building Division and Fire and Rescue Department standards. The proposed project is a townhome development bordered by existing single-family and multiple-family residences. The proposed project does not include the use of any incompatible vehicles or equipment, such as farm equipment. The project's residential uses would be fully compatible with surrounding land uses and any other components of the proposed project would not increase hazards to the public due to any incompatible uses. Therefore, such impacts are less than significant and no mitigation is required.

Threshold (d) Would the project result in inadequate emergency access?

Less Than Significant Impact. As noted above, the proposed project would provide vehicular access from Broadway. The driveway entrance and interior drive aisles would accommodate standard fire lane turning radiuses and hammerhead turnaround maneuvers. Anaheim Fire and Rescue would review project plans for final approval prior to issuance of a building permit. Compliance with Anaheim Fire and Rescue requirements would ensure the no impacts would occur. Additionally, the project would not require the complete closure of any public or private streets or roadways during construction. Temporary construction activities would not impede the use of the road for emergencies or access for emergency response vehicles. Therefore, impacts are less than significant and no mitigation is required.

Cumulative Impacts

The proposed project would have a less than significant impact with respect to transportation. The proposed project and foreseeable future projects would be subject to compliance with the established regulatory framework (Anaheim VMT Thresholds, General Plan Policies, AMC, etc.) which would reduce potential impacts. Therefore, the project's contribution to cumulatively significant impacts would similarly be less than significant.

Standard Conditions and Mitigation Measures

No standard conditions or mitigation measures are required.

4.18 Tribal Cultural Resources

Threshold (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 §5020.1(k), or

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 Resources Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant Impact with Mitigation. Chapter 532 Statutes of 2014 (i.e., AB 52) requires that lead agencies evaluate a project's potential impact on "tribal cultural resources." Such resources include "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources." AB 52 also gives lead agencies the discretion to determine, based on substantial evidence, whether a resource qualifies as a "tribal cultural resource."

In compliance with PRC §21080.3.1(b), the City has provided formal notification to California Native American tribal representatives identified by the California Native American Heritage Commission. Native American groups may have knowledge about cultural resources in the area and may have concerns about adverse effects from development on tribal cultural resources as defined in PRC §21074. The City has contacted the tribal representatives noted below.

- Manzanita Band of Kumeyaay Nation, Angela Elliot Santos
- Gabrieleño/Tongva San Gabriel Band of Mission Indians, Anthony Morales
- Gabrieleño/Tongva Tribe, Charles Alvarez
- Sycuan Band of the Kumeyaay Nation, Cody Martinez
- La Posta Band of Diegueno Mission Indians, Gwendolyn Parada
- La Posta Band of Diegueno Mission Indians, Javaughn Miller
- Santa Rosa Band of Cahuilla Indians, Lovina Redner
- Juaneno Band of Mission Indians Acjachemen Nation, Matias Belardes/Joyce Perry
- Ewiiaapaayp Band of Kumeyaay Indians, Michael Garcia
- Mesa Grande Band of Diegueno Mission Indians, Michael Linton
- Campo Band of Diegueno Mission Indians, Ralph Goff
- Gabrieleño/Tongva Indians of California Tribal Council, Robert Dorame
- Ewiiaapaayp Band of Kumeyaay Indians, Robert Pino

Correspondence to and from tribal representatives is included as **Appendix I: Native American Tribal Consultation Correspondence** to this Initial Study. As of the release date of the Initial Study, the City has received two requests for consultation: from the Juaneno Band of Mission Indians Acjachemen Nation – Belardes, which occurred on March 17, 2021, and from the Gabrieleño Band of Mission Indians – Kizh Nation, which occurred on March 30, 2021.

It is unlikely that Native American tribal cultural resources are present on the project site, given construction of the former school facilities required site disturbance and excavation. Notwithstanding, project construction would include limited excavation and grading. Therefore, while low, there is the potential for the project to affect previously unidentified Native American tribal cultural resources. The project would be subject to compliance with MM TCR-1, which requires a Juaneno Band of Mission Indians Acjachemen Nation – Belardes Monitor to be present on the project site during construction phases that involve ground-disturbing activities within undisturbed native sediments. Similarly, MM TCR-2 would be required as well, which requires a Gabrieleño Band of Mission Indians – Kizh Nation Monitor to be present on the site during construction phases. Compliance with MM TCR-1 and MM TCR-2 would reduce potential impacts to tribal resources to a less than significant level.

Mitigation Program

Standard Conditions and Requirements

No standard conditions are applicable to the proposed project

Mitigation Measures

MM TCR-1 Prior to commencement of any grading and/or construction activity, the Project Applicant shall retain a Native American Monitor from the Juaneno Band of Mission Indians Acjachemen Nation – Belardes (Tribal Monitor) and a copy of the executed contract shall be submitted to the City of Anaheim Planning and Building Department. The Juaneno Band of Mission Indians Acjachemen Nation – Belardes Tribal Monitor will only be present on-site during the construction phases that involve ground-disturbing activities within undisturbed native sediments. Ground disturbing activities may include, but are not limited to, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the Project site. The Juaneno Band of Mission Indians Acjachemen Nation – Belardes Tribal Monitor 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 from the Juaneno Band of Mission Indians Acjachemen Nation – Belardes have indicated that the Project site has a low potential for impacting archaeological or tribal cultural resources.

Upon discovery of any archaeological or tribal cultural resources, construction activities shall cease in the immediate vicinity of the find until the find can be assessed. All archaeological and/or tribal cultural resources unearthed by project construction activities shall be evaluated by the qualified archaeologist and Juaneno Band of Mission Indians Acjachemen Nation – Belardes Tribal monitor. If the resources are Native American in origin, the Juaneno Band of Mission Indians Acjachemen Nation – Belardes Tribal Representative shall coordinate with the Project Applicant regarding treatment and curation of these resources. Typically, the Juaneno Band of Mission Indians Acjachemen

Nation – Belardes will request reburial or preservation for educational purposes. Work may continue on other parts of the Project Site while evaluation and, if necessary, mitigation takes place (State CEQA Guidelines §15064.5[f]). If a resource is determined by the qualified archaeologist 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 State CEQA Guidelines §15064.5(f) for historical resources and PRC §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. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County, the Copper Center, or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.

MM TCR-2 Prior to commencement of any grading and/or construction activity, the Project Applicant shall retain a Native American Monitor from the Gabrieleño Band of Mission Indians – Kizh Nation (Tribal Monitor) and a copy of the executed contract shall be submitted to the City of Anaheim Planning and Building Department. The Gabrieleño Band of Mission Indians – Kizh Nation Tribal Monitor will only be present on-site during the construction phases that involve ground-disturbing activities within undisturbed native sediments. Ground disturbing activities may include, but are not limited to, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the Project site. The Gabrieleño Band of Mission Indians – Kizh Nation Tribal Monitor 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 from the Gabrieleño Band of Mission Indians – Kizh Nation have indicated that the Project site has a low potential for impacting archaeological or tribal cultural resources.

Upon discovery of any archaeological or tribal cultural resources, construction activities shall cease in the immediate vicinity of the find until the find can be assessed. All archaeological and/or tribal cultural resources unearthed by project construction activities shall be evaluated by the qualified archaeologist and Gabrieleño Band of Mission Indians – Kizh Nation monitor. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians – Kizh Nation Tribal Representative shall coordinate with the Project Applicant regarding treatment and curation of these resources. Typically, the Gabrieleño Band of Mission Indians – Kizh Nation will request reburial or preservation for educational purposes. Work may continue on other parts of the Project Site while evaluation and, if necessary, mitigation takes place (State CEQA Guidelines §15064.5[f]). If a resource is determined by the qualified archaeologist 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 State CEQA Guidelines §15064.5(f) for historical resources and PRC §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. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County, the Copper Center, or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.

4.19 Utilities and Service Systems

The basis for the information in this section includes the *Sewer Study* prepared by GHD (January 2021); the report is included in **Appendix J: Sewer Study** of this Initial Study.

Threshold (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?

a.i) Water - Less Than Significant Impact. See Thresholds 4.10(a) and 4.10(b).

The City uses imported water, local groundwater, and recycled water to meet its water needs. The City works with two primary agencies to supply water to the community: the MWD and the OCWD. The City's main source of water supply is groundwater from the OCGB. Currently, the City relies on approximately 70 percent groundwater and 30 percent imported water. The same water supply mix is anticipated to be available to the City through 2040. The OCGB is adjudicated, therefore, is subject to a maximum allowed pumping allocation for groundwater extraction across the basin. The increase in water demand from proposed project implementation would account for less than one percent of expected total demand in 2040 and can be accommodated by the City. Therefore, the proposed project does not require and would not result in the construction of new water facilities or expansion of existing facilities. Impacts would be less than significant and no mitigation is required.

a.ii) Wastewater Treatment - Less Than Significant Impact. The City's Sewer and Storm Drain Maintenance Division is responsible for maintenance of the City's sewer and storm drain lines. The project site is situated within the West Anaheim Master Plan of Sanitary Sewers (WAMPSS), which was adopted in August 2019. The WAMPSS study area evaluated the existing sewer system, which includes approximately 870,000 linear feet of sewer pipelines. Wastewater from the WAMPSS area drains into an Orange County Sanitation District (OCSD) trunk sewer at Knott Avenue, Orange Avenue, Magnolia Avenue, and Euclid Avenue for further treatment and final discharge. The project would generate a steady state sewage flow of 24,080 gallons per day (gpd), which represents an increase of 21,937 gpd over the sewer loading from the former school use.[47] The City has a maximum allowable ratio of flow depth to pipe diameter (known as d/D) at actual peak flow of 0.75. GHD observed Maximum d/D ratios of up to 0.64 at the 15-inch sewer main on the west side of Gilbert Street, well within the City's maximum allowable d/D of 0.75 for pipes with diameters equal to or greater than 12 inches. The sewer analysis concluded that there is adequate capacity in the City sewer system to accommodate the proposed project. Further, the project would not require, or result in, the construction of new storm drainage facilities or expansion of existing facilities. Therefore, impacts would be less than significant and no mitigation is required.

a.iii) Electric Power, Natural Gas, Telecommunication – Less Than Significant Impact. Anaheim Public Utilities (APU) provides electrical power to the City and the Southern California Gas Company (SoCal Gas) provides natural gas. Various companies including AT&T, Spectrum, and Cox provide telecommunications. APU, SoCalGas, and local telecommunications companies operate and maintain transmission and distribution infrastructure in the project area and currently serve the project site. The project's electricity demand would be approximately 574,000 kWh/year and natural gas demand would be approximately 1,976,310 KBtu/year; see Section 4.6, Energy, for further discussion concerning the project's electricity and natural gas demands. The project would be located in an urbanized area and connect to existing

[47] GHD. (January 2021). *The Connelly Project (OTH2020-01322) Sewer Analysis.*

electric, natural gas, and telecommunication infrastructure; no off-site infrastructure improvements would be required. The project would not substantially increase service demand for utility providers through substantial unplanned population growth and existing capacity would be sufficient to support project residents. Therefore, impacts would be less than significant and no mitigation is required.

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

Less Than Significant Impact. The City's 2015 Urban Water Management Plan (UWMP) was prepared in compliance with Urban Water Management Planning Act (UWMPA) requirements. The UWMPA requires every urban water supplier providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 AF of water annually to prepare, adopt, and file a UWMP with the California Department of Water Resources (DWR) every 5 years in the years ending in zero and five. The 2015 UWMP provides water supply planning for a 25-year planning period in 5-year increments and identifies water supplies needed to meet existing and future demands. The demand analysis must identify supply reliability under three hydrologic conditions: a normal year; a single-year; and multiple dry years.

Historically, the City's water supply primarily came from a combination of groundwater (70%) and imported water (30%). However, the City has taken most of its wells offline(as of March 2020). As of April 2021, there are only four active wells, while the remaining wells have been taken offline due to either PFAS contamination (a group of chemicals referred to as polyfluoroalkyl substances) or mechanical issues. Currently, the majority of the City's water supply comes from imported water. Over the next several years, the City plans to construct groundwater treatment facilities to treat PFAS contamination.

The basis for the UWMP's water demand forecasting method is a combination of population forecasts for residential uses and General Plan land use designations for non-residential land uses. SCAG has developed growth forecasts for cities and counties, which it bases on General Plans; see Threshold 4.14a. In turn, the City uses SCAG's growth projections to forecast residential water demands in the UWMP. Because the project site is designated School, it is assumed the UWMP's forecast water demands assume a non-residential land use (i.e., a school) for the project site and not a population forecast. The project's water demand, which assumes indoor water conservation measures (e.g., low flow rate plumbing fixtures), and outdoor conservation measures (e.g., drought tolerant landscaping), would total approximately 48,633 gpd or 54.5 AFY.[48] The forecasted population for the proposed project would result in an increase of approximately 377 persons, which represents nominal population growth (approximately 0.09 percent) over SCAG's forecast population for the City of 416,800 persons for 2045. Therefore, although the UWMP did not assume residential use water demand for the project site, the project's water demand is considered nominal and conservative, given no credit was taken for the displaced school assumed in the UWMP. Additionally, the project's water demand would account for less than one percent of expected total demand in 2040. Sufficient water supplies would be available to serve the project. Therefore, a less than significant impact would occur and no mitigation is required.

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

[48] City of Anaheim 2015 Urban Water Management Plan. June 2016. – Gallons Per Capita Per Day rate is 129. Assuming 377 residences and 129 gpcd, total water usage is 48,633.

Less Than Significant Impact. As noted in Threshold 4.19 (a), the City of Anaheim Sewer and Storm Drain Maintenance Division is responsible for the maintenance of the City's sewer and storm drain lines. The project's Sewer Analysis determined that the proposed project would generate a steady state sewage flow of 24,080 gpd, which represents an increase of 21,937 gpd over the sewer loading from the former school use. The City has a maximum allowable ratio of flow depth to pipe diameter (known as d/D) at actual peak flow of 0.75. GHD observed maximum d/D ratios of up to 0.64 at the 15-inch sewer main on the west side of Gilbert Street, which is well within the City's maximum allowable d/D of 0.75 for pipes with diameters equal to or greater than 12 inches. Despite the increase in sewer generation, there is adequate capacity to serve the proposed project. Therefore, impacts would be less than significant and no mitigation is required.

Threshold (d) Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. Republic Services, a private recycling and non-hazardous solid waste hauler, provides solid waste services to the City. Republic Services is responsible for all residential, commercial, and industrial waste and recycling services. Solid waste is disposed of in Orange County landfills. Currently, there are three active landfills in the County: Frank R. Bowerman Landfill in Irvine, Olinda Alpha Landfill in Brea, and Prima Deshecha Landfill in San Juan Capistrano. **Table 4.19-1: Orange County Landfill Capacities** provides capacity details for each of the County landfills.

Table 4.19-1: Orange County Landfill Capacities

Landfill	Maximum Daily Permitted Tonnage (tons per day)	Maximum Permitted Capacity (Cubic Feet)	Remaining Capacity
Frank R. Bowerman	11,500	266,000,000	205,000,000
Olinda Alpha	8,000	148,800,000	34,200,000
Prima Deshecha	4,000	172,900,000	134,300,000

Source: CalRecycle. Solid Waste Information System (SWIS), 2021.

Based on a generation rate of 12.23 pounds (lbs)/household/day for residential uses, the project would generate approximately 1,370 pounds per day of solid waste.[49] The project's projected solid waste generation would account for less than one percent of the overall daily capacity of the County landfills. The proposed project would include recycling programs to reduce the amount of solid waste produced on the project site. Existing landfills have sufficient capacity to serve the proposed project and solid waste generated during construction and operations would represent a nominal increase compared to the daily permitted tonnage at landfills. Compliance with all applicable regulations and laws regarding solid waste would further reduce impacts. Therefore, impacts are less than significant and no mitigation is required.

[49] CalRecyle. 2006. *Estimated Solid Waste Generation Rates: Residential Sector Generation Rates.* Available at https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates. Accessed February 17, 2021.

Threshold (e) Would the project comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

Less than Significant. Regulations specifically applicable to the proposed project include the California Integrated Waste Management Act of 1989 (AB 939), and CalGreen Code §4.408, and AB 341, which requires multiple-family residential development and commercial uses to implement recycling programs.

The Integrated Waste Management Act, which requires every City and County in the State to prepare a Source Reduction and Recycling Element (SRRE) to its Solid Waste Management Plan, identifies how each jurisdiction will meet the State's mandatory waste diversion goal of 50 percent by and after the year 2000. AB 341 increased the diversion goal to 75 percent by 2020. Anaheim Municipal Code Chapter 12.63 stipulates standards and regulations for the collection and management of solid waste in the City, in accordance with the Integrated Waste Management Act.

The 2019 CalGreen Code §4.408 requires preparation of a Construction Waste Management Plan that outlines ways in which the contractor would recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition debris. During the construction phase, the project would be required to comply with the CalGreen Code through the recycling and reuse of at least 65 percent of the nonhazardous construction and demolition debris from the project site.

As noted in Threshold 4.19 (d), solid waste would be disposed of at existing Orange County Waste and Recycling landfills. Disposal of solid waste would comply with all federal, State, and local statues and regulations related to solid waste. The project would include receptacles for recyclables and garbage, and impacts would be less than significant.

Threshold (f) Result in a need for new systems or supplies, or substantial alterations related to electricity?

Anaheim Public Utilities provides electric power to the City. The proposed project's electricity demand would be approximately 574,000 kWh/year. See Section 4.6, Energy, for further discussion on electricity. The project would be located in an urbanized area and connect to existing electricity infrastructure; no off-site infrastructure improvements would be required. The project would not substantially increase service demand for electricity through substantial unplanned population growth and existing systems and supplies would be sufficient to support project residents. Therefore, impacts would be less than significant and no mitigation is required.

Threshold (g) Result in a need for new systems or supplies, or substantial alterations related to natural gas?

The Southern California Gas Company (SoCal Gas) provides natural gas to the City. The proposed project's natural gas demand would be approximately 1,976,310 KBtu/year. See Section 4.6, Energy, for further on natural gas. The project would be located in an urbanized area and connect to existing natural gas infrastructure; no off-site infrastructure improvements would be required. The project would not substantially increase service demand for natural gas through substantial unplanned population growth and existing systems and supplies would be sufficient to support project residents. Therefore, impacts would be less than significant and no mitigation is required.

Threshold (h) Result in a need for new systems or supplies, or substantial alterations related to telephone service

Threshold (i) Result in a need for new systems or supplies, or substantial alterations related to television service/reception?

Various companies including AT&T, Spectrum, and Cox provide telephone and television services. Anaheim Public Utilities, SoCal Gas, and local telecommunications companies operate and maintain transmission and distribution infrastructure in the project area and currently serve the project site. The proposed project is located in an urbanized area and telecommunication infrastructure; no off-site infrastructure improvements would be required. The proposed project would not substantially increase service demand for telephone and television providers through substantial unplanned population growth and existing capacity would be sufficient to support project residents. Therefore, impacts would be less than significant and no mitigation is required.

Cumulative Impacts

The proposed project would have a less than significant impact with respect to utilities and service systems. Development of public utility infrastructure is part of an extensive planning process involving utility providers and jurisdictions with discretionary review authority. The coordination process associated with the preparation of development and infrastructure plans ensures that adequate resources are available to serve both individual projects and cumulative demand for resources and infrastructure because of cumulative growth and development in the area. Each individual project is subject to review for utility capacity to avoid unanticipated interruptions in service or inadequate supplies. Coordination with the utility companies would allow for the provision of utility service to the proposed project and future developments in the City. The project and other planned projects are subject to connection and service fees to assist in facility expansion and service improvements triggered by an increase in demand. Because of the utility planning and coordination activities described above, there are no significant cumulative utility impacts.

Standard Conditions and Mitigation Measures

No standard conditions or mitigation measures are required.

4.20 Wildfire

Threshold (a) If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. CalFire Fire Hazard Severity Zone Map for Orange County indicates the project site is not within a State Responsibility Area.[50] The project site is in a Non-Very High Fire Hazard Severity Zone (Non-VHFHSZ) zone within a local responsibility area. Project design and site access would adhere to Orange County Fire regulations and designs. Further, project construction would not require the complete closure of any public or private streets or roadways during construction. Temporary construction activities would not impede use of the road for emergencies or access for emergency response vehicles. Therefore, the project would not result in inadequate emergency access, and no impact would occur.

Threshold (b) If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. As discussed above, the project site is not within a very high fire hazard severity zone. Therefore, no impact would occur.

Threshold (c) If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project 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. The project site is not located in or near State responsibility areas or a very high fire hazard severity zone. The project site is in an urbanized area of the City and would connect to the existing infrastructure that currently serves the project area. Project implementation would not result in the new construction, installation, or maintenance of new infrastructure. No impact would occur.

Threshold (d) If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The project is not within an area classified as very high fire hazard severity zone**.** The project site does not include any downslopes. According to the California Geological Survey, the project site is not within an area identified as having a potential for landslides.[51] The project site and surrounding vicinity are relatively flat. There are no known landslides near the site nor is the site in the path of any known or potential landslides. Therefore, no impacts would occur.

[50] California Department of Forestry and Fire Protection, California Fire Hazard Severity Zone Viewer Available at: https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414, Accessed February 2, 2021.

[51] California Geological Survey, Geologic Hazards Data and Maps Data Viewer, Available at: https://maps.conservation.ca.gov/geologichazards/, Accessed February 2, 2021.

Standard Conditions and Mitigation Measures

No standard conditions or mitigation measures are required.

4.21 Mandatory Findings of Significance

Threshold (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. On the basis of the foregoing analysis, the project does not have the potential to significantly 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 or 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. The project site is in an urbanized area of the City bordered by existing development. The project would not conflict with the General Plan and the Municipal Code subject to approval of a General Plan Amendment and Reclassification.

Threshold (b) Does the project have possible environmental effects which are individually limited, but cumulatively considerable?

Less Than Significant Impact. The project does not have impacts that are individually limited, but cumulatively considerable. Incremental impacts resulting from project construction and operations and other cumulative projects that would be under construction include biological resources, cultural resources, geology and soils, hydrology and water quality, noise, and tribal resources. The analysis concluded that these incremental impacts are each less than significant or can be mitigated to a less than significant level. When viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects, these impacts are not cumulatively considerable. There would be no cumulative impacts in connection with this or other projects. The proposed project complies with long-term regional air quality plans, regional population forecasts, and is within the service capabilities of utility purveyors. There would be no significant adverse environmental impacts. The analysis contained in this Initial Study evaluated existing conditions, potential impacts associated with project development, and possible environmental cumulative impacts. The project does not have any impact on projected growth or planned projects for the City or neighboring jurisdictions known as of the date of this analysis.

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

Less Than Significant Impact. There are no known substantial adverse effects on human beings, which the proposed project would cause, either directly or indirectly. The environmental evaluation has concluded that no significant environmental impacts would result from the project.

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5.0

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