DRAFT

INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION

EXTRA SPACE STORAGE 1761 WEST KATELLA PROJECT

ANAHEIM, CALIFORNIA

DEV2023-00016

Submitted to:

City of Anaheim
200 South Anaheim Boulevard, Suite 162
Anaheim, California 92805

Prepared by:

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Project No. 20220838

November 2024

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1.0 INTRODUCTION

In accordance with the California Environmental Quality Act (CEQA) and the *State CEQA Guidelines*, this Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared for the proposed Extra Space Storage 1761 West Katella Project (proposed project) located at 1761 West Katella Avenue, Anaheim, in Orange County, California. Consistent with *State CEQA Guidelines* Section 15071, this IS/MND includes a description of the proposed project, an evaluation of the potential environmental impacts, and findings from the environmental analysis.

This IS/MND evaluates the potential environmental impacts that may result from development of the project. Consistent with *State CEQA Guidelines* Section 15050, the City of Anaheim (City) is the Lead Agency under CEQA and is responsible for adoption of the IS/MND and approval of the project.

1.1 PROJECT INFORMATION

1. **Project Title:**

   Extra Space Storage 1761 West Katella Project

2. **Lead Agency Name and Address:**

   City of Anaheim
   200 South Anaheim Boulevard, Suite 162
   Anaheim, California 92805
   (714) 765-4958

3. **Contact Person and Phone Number:**

   Nicholas J. Taylor, AICP, Principal Planner
   City of Anaheim
   200 South Anaheim Boulevard, Suite 162
   Anaheim, California 92805
   (714) 765-4323
   ntaylor@anaheim.net

4. **Project Location:**

   The 1.93-acre project (Assessor's Parcel Number [APN] 128-542-11) site located at 1761 West Katella Avenue in Anaheim, California, is currently developed with two self-storage buildings and a surface parking lot and is surrounded by a mixture of residential, commercial, and industrial uses. As shown on Figure 2-1, Regional Location, regional access to the project site is provided by Interstate 5 (I-5), located approximately 1.75 miles northeast of the project site. Local access to the project site is provided by West Katella Avenue and Euclid Boulevard.

5. **Project Applicant:**

   Extra Space Storage
   2795 East Cottonwood Parkway, Suite 300
   Salt Lake City, Utah 84121

6. **General Plan Designation:**

   According to the City of Anaheim's (City) General Plan Land Use Map (2004), the project site is designated Residential Low Medium Density.

7. **Zoning:**

   According to the City's Zoning Map, the project site is zoned Commercial-General (C-G).

8. **Description of Project:**

   The proposed project would consist of the demolition of one existing single-story self-storage building as well as approximately 57 RV/boat/vehicle storage parking spaces. The proposed project would construct a two-story, with one subterranean level, self-storage facility. Access to the project site would be provided by two driveways along Humor Drive. See the detailed discussion below in Chapter 2.0, Project Description.

9. **Surrounding Land Uses and Setting:**

   The project site is located at 1761 West Katella Avenue in a highly urbanized area of Anaheim. The proposed project site is immediately bounded to the west by Humor Drive, to the north by multifamily residential uses, to the east by single-family residential uses and commercial uses, and to the south by West Katella Avenue.

10. **Other Public Agencies Whose Approval is Required (e.g., permits, financial approval, or participation agreements):**

    a) **City of Anaheim:** Adoption of the Initial Study/Mitigated Negative Declaration (IS/MND) and approval of a Conditional Use Permit (CUP) to allow an expansion of an existing self-storage facility and an increase in the maximum Floor-Area-Ratio (FAR) limit in Commercial General (C-G) zoning designation, and application of internal City policy allowing development inconsistent with General Plan Designation.

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

    Letters were sent to the list of tribal contacts provided by the Native American Heritage Commission (NAHC) via certified mail on August 31, 2023, notifying them of their opportunity to consult for this project, pursuant to Assembly Bill (AB) 52. The Gabrieleño Band of Mission Indians – Kizh Nation requested consultation with the City regarding the proposed project. Gabrieleño Band of Mission Indians – Kizh Nation requested that a monitor be present prior to commencement of all ground-disturbing activities. Consultation was conducted from September 2023 to February 2024.

2.0 PROJECT DESCRIPTION

This section describes the Extra Space Storage 1761 West Katella Project (project) evaluated in this Initial Study/Mitigated Negative Declaration (IS/MND). It provides a description of the proposed project's location, characteristics, and required approvals.

2.1 EXISTING PROJECT SITE

As shown in Figure 2-1, Regional Location, the project site is located at 1761 West Katella Avenue in the City of Anaheim (City). The approximately 1.93-acre, 84,071-square-foot (sf) project site is located along the northern border of Katella Avenue. The project site consists of Assessor's Parcel Number (APN) 128-542-11. The existing project site includes 62,235 sq ft of self-storage uses, including a 58,956 sq ft self-storage building (to remain), a separate 3,279 sq ft one-story self-storage building (to be demolished), and a surface parking lot. The project site is generally flat in elevation. In the project site's existing condition, vehicular access is provided via two driveways along Humor Drive.

The project site is surrounded by a mixture of residential, commercial, and industrial uses. The proposed project site is immediately bounded to the west by a church across Humor Drive, to the north by multifamily residential uses, to the east by single-family residential uses and commercial uses, and to the south by commercial uses across West Katella Avenue. Regional access to the project site is provided by Interstate 5 (I-5), located approximately 1.75 miles northeast of the project site. Local access to the project site is provided by West Katella Avenue and Euclid Boulevard.

2.2 PROPOSED PROJECT

The proposed project would demolish the existing single-story, 3,279 sq ft self-storage building as well as approximately 57 RV/boat/vehicle storage parking spaces. The proposed project would construct a 52,661 sq ft self-storage facility that includes two stories above ground plus a below ground basement. The new facility would contain 588 storage units and 21 parking spaces. The existing single-story, 58,956 sq ft self-storage building would remain on site. In addition, under post-development conditions, the total self-storage square footage on site (including the existing 58,956 sq ft to remain) will be 111,617 sq ft, including a total of 871 storage units.

Figure 2-2, Conceptual Site Plan, provides an overview of the proposed site plan, including the location of the existing building to remain, the proposed building, vehicular access, parking areas, and a trash enclosure. The trash enclosure would be located on the ground floor of the proposed building adjacent to the southernmost vehicular driveway, immediately behind the access gate. Existing fences along the northern and eastern boundaries of the site will be replaced with 8 ft high masonry walls. Hours of operation would remain the same: Monday through Friday 9:30 a.m. to 6:00 p.m., Saturday from 9:00 a.m. to 5:30 p.m., and closed on Sunday. Storage gates hours would also remain the same: Monday through Sunday 6:00 a.m. to 8:00 p.m.

2.2.1 Zoning and General Plan Land Use Designations

According to the City's Zoning map, the project site is currently zoned for Commercial General (C-G). Per Anaheim Municipal Code Section 18.08.030 (Uses), a self-storage facility requires the approval of

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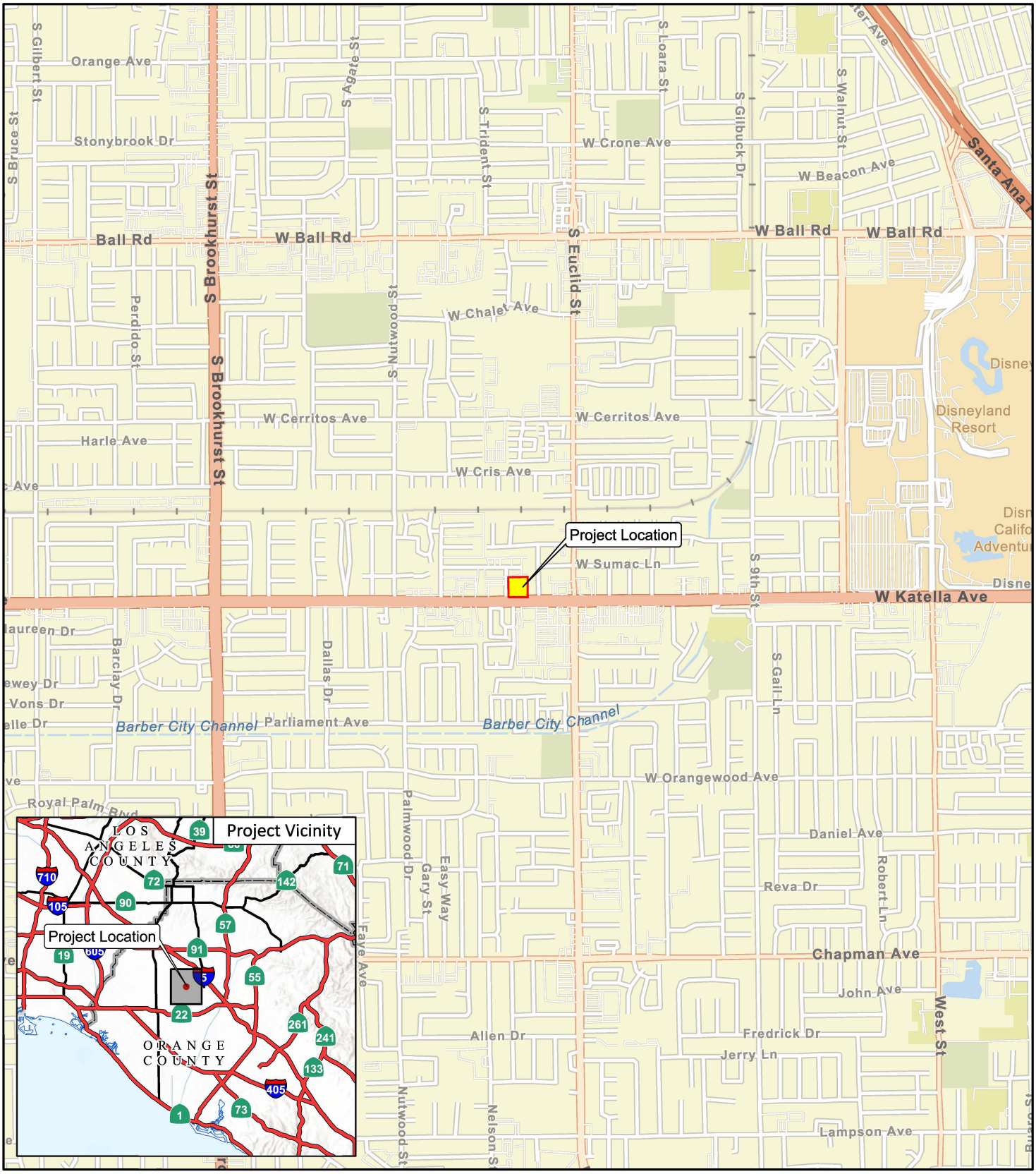

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FIGURE 2-1

Extra Space Storage 1761 West Katella Project

Regional Location

SOURCE: Esri World Street Map (2023)

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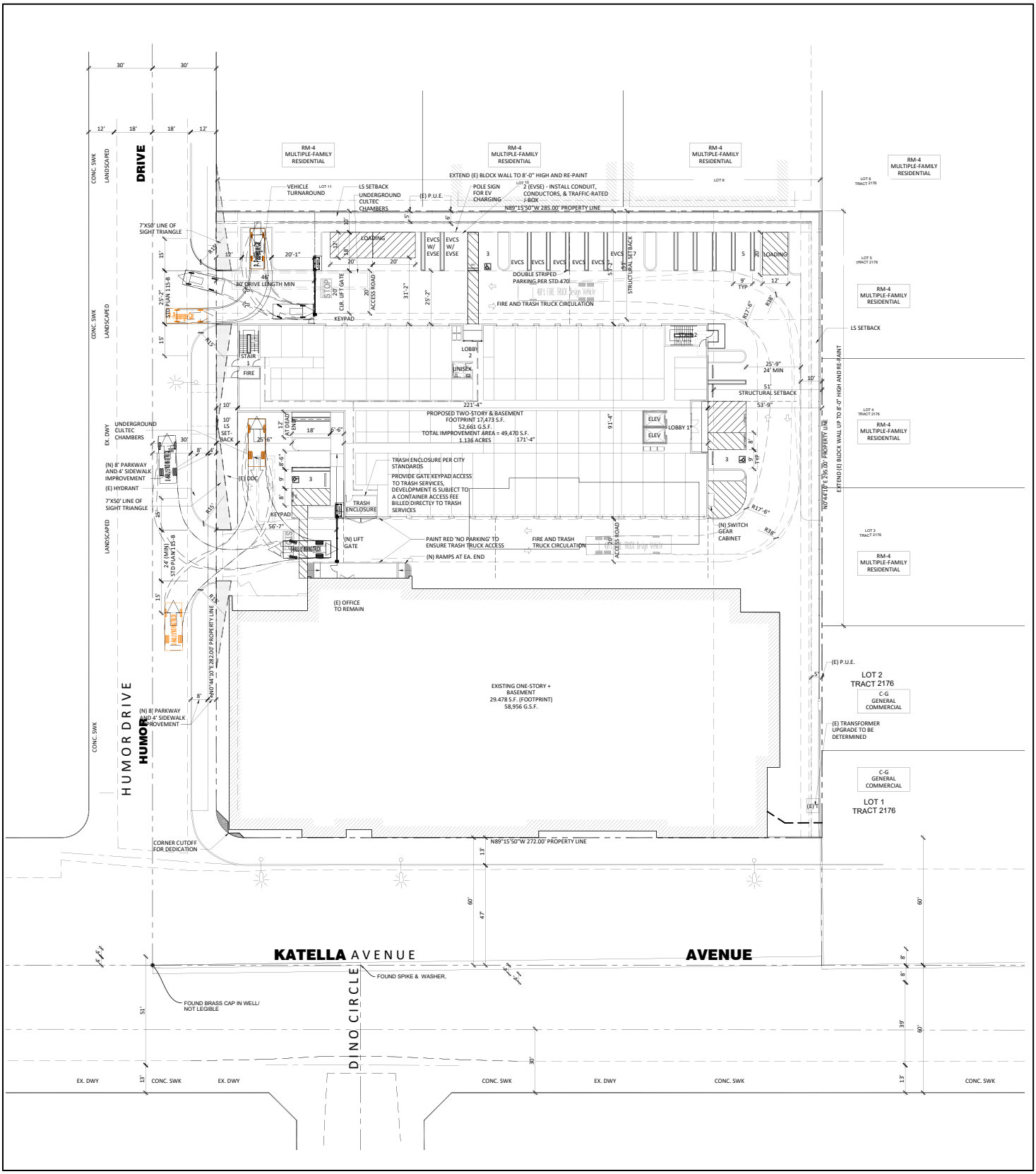

FIGURE 2

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FEET

SOURCE: KSP Studios

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Extra Space Storage 1761 West Katella Project

Conceptual SitePlan

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a Conditional Use Permit (CUP) in the C-G zone. Additionally, an increase in the maximum Floor Area Ratio (FAR) is permitted subject to the approval of a CUP. Per Anaheim Municipal Code Section 18.08.045, the maximum FAR for the C-G zone is 0.50. The proposed FAR on the project site is 1.33 and requires a CUP to exceed FAR requirements.

The project proposes to modify CUP 3779, approved in 1995, which first authorized the use of a self-storage facility within existing office buildings. City of Anaheim Council Policy 7.2[1], adopted in 1998, allows for self-storage facilities as a conditionally permitted use in certain commercial and industrial zones "on irregularly-shaped properties which may be further constrained by accessibility or visibility and which may not be suitable for conventional types of development." However, the existing self-storage CUP was approved in 1995 prior to the adoption of City of Anaheim Council Policy 7.2, which is therefore not applicable to the proposed project. In 2004, the C-L zoning classification was re-named C-G (Commercial General).

Pursuant to Anaheim Municipal Code Section 18.60.160, the self-storage facility use has been established on the project site. There are no provisions in the Anaheim Municipal Code to preclude the expansion of the use in accordance with the development standards and regulations for the operation of the use in the C-G zone.

With approval of the CUPs, the proposed project would be consistent with the C-G zoning designation. According to the City of Anaheim General Plan, the project site has a current General Plan designation of Residential Low-Medium Density. In 2004 as part of the City's comprehensive update to the General Plan, the project site was assigned the land use designation of Residential Low-Medium Density as part of a citywide re-designation of underutilized mid-block commercial areas to residential land uses. Anaheim is a Charter City. Therefore, at that time and until 2018, Government Code Section 65860, which requires that the zoning ordinance be consistent with the General Plan, did not apply to the City. Current State law would preclude removing the residential land use designation. Based on the above, the proposed project is considered consistent with the City's General Plan.

2.2.2 Site Access and Parking

The proposed project would provide vehicular access via two driveways along Humor Drive. The southernly driveway will provide entry to the site, and the northernly driveway will provide exit from the site. Two new automatic lift gates are proposed providing vehicular access to Humor Drive. The gates would be open to the public from 6:00 a.m. to 8:00 p.m. daily. As shown on Figure 2-2, an interior u-shape parking and loading area is located throughout the project site, surrounded by the ground level of the proposed building. The proposed project would include a total of 21 parking spaces (both existing and proposed), 3 of which would be Americans with Disabilities Act (ADA) compliant, and 4 of which would be electric vehicle capable. The Parking Analysis Memorandum (provided in Appendix H) concluded that, based on the application of empirical parking rates from the Institute of Transportation Engineers' (ITE) *Parking Generation Manual,* Extra Space Storage facilities in the vicinity of the proposed project, and municipal code requirements of adjacent cities, the proposed

[1] City of Anaheim. 2022b. Council Policy Manual. Website https://www.anaheim.net/DocumentCenter/View/4453/Council-Policies-Manual (accessed October 20, 2023).

21 parking space supply is within the range of demand expected for the project and would provide adequate parking to accommodate the peak parking demand of the proposed project.

2.2.3 Building Design

The proposed project would include the development of an approximately 52,661 sq ft self-storage facility providing 588 storage units. Under post-development conditions, the total self-storage square footage on site (including the existing 58,956 sq ft building to remain) would be 111,617 sq ft and include a total of 871 storage units. The building footprint of the existing 58,956 sq ft self-storage building with a basement (to remain) is 28,478 sq ft. The building footprint of the proposed two-story building is 17,473 sq ft. Under post-development conditions, the total footprint of the buildings on site would be 46,951 sq ft resulting in a total building footprint of approximately 56 percent of the total project site (84,071 sq ft). The proposed building would be two stories, above ground, approximately 26 feet (ft), 4 inches (in), in height, with a maximum height of 31 ft, 4 in, for an elevator housing, and a basement level with a floor to floor height of 10 ft, 8 in.

The on-site office is located in the northwestern corner within the existing one-story building to remain on site. The office will be operational throughout construction and is open to the public from Monday through Friday 9:30 a.m. to 6:00 p.m., Saturday from 9:00 a.m. to 5:30 p.m., and closed on Sunday. The proposed project would not require any additional employees on site compared to existing operations. Elevator access to the second floor in the proposed building would be provided in the eastern lobby, surrounded by the interior parking and loading areas. Stair access would be provided in the northwest and northeast corners of the proposed building.

2.2.4 Infrastructure Improvements

As part of the project, new electricity, water, telephone, and sewer infrastructure would be constructed within the project site to connect the proposed building to the existing main lines. Two storm drain pipes, including an 8-inch storm drain and a 12-inch storm drain, would be constructed on the project site and be connected to new 24 x 24-inch catch basins located around the perimeter of the project site.

2.2.5 Construction and Grading

Development of the proposed project would require demolition of the existing single-story, 3,279 sq ft self-storage building; excavation and grading of the site; delivery of materials; and construction of the building area and proposed parking lot. Construction of the proposed project is anticipated to commence in September 2025and occur for approximately 12 months. It is anticipated that an average of 10 construction workers would be on site each day.

Based on the preliminary grading plans, the proposed project would require the import of approximately 330 cubic yards of soil. Site preparation, grading, and building activities would involve the use of standard earthmoving equipment such as large excavators, cranes, and other related equipment.

Construction of the proposed project would require a maximum excavation depth of 13 ft. The proposed project would not require the removal of any trees from the project site.

3.0 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 in Chapter 3.0.

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

DETERMINATION

On the basis of this initial evaluation:

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

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

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

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

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

Nicholas J. Taylor
Principal Planner

Date

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4.0 CEQA ENVIRONMENTAL CHECKLIST

4.1 AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 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 a 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?	☐	☐	☒	☐

4.1.1 Impact Analysis

a. Would the project have a substantial effect on a scenic vista?

No Impact. A scenic vista is the view of an area that is visually or aesthetically pleasing from a certain vantage point. It is usually viewed from some distance away. Aesthetic components of a scenic vista include (1) scenic quality, (2) sensitivity level, and (3) view access. A scenic vista can be impacted in two ways: a development project can have visual impacts by either directly diminishing the scenic quality of the vista or by blocking the view corridors or "vista" of the scenic resource. Important factors in determining whether a proposed project would block scenic vistas include the project's proposed height, mass, and location relative to surrounding land uses and travel corridors.

The City of Anaheim is largely urban by nature. The City of Anaheim General Plan Green Element[2] specifies that the City's Hill and Canyon Area, which is located in the eastern portion of the City, contains many natural slopes. Other visual amenities in the City include golf courses and the Santa Ana River. Goal 2.1 of the General Plan Green Element aims to preserve views of ridgelines, natural open space, and other scenic vistas. The project site is located in West Anaheim, approximately 20 miles west of the Santa Ana Mountains and approximately 7 miles west of the Hill and Canyon Area.[3] The Dad Miller Golf Course is approximately 2.5 miles north of the project site.

[2] City of Anaheim. 2004c. General Plan Green Element. Website: https://www.anaheim.net/DocumentCenter/View/9521/F-Green-Element?bidId= (accessed July 26, 2023).

[3] City of Anaheim. 2004d. General Plan Land Use Element. Website: https://www.anaheim.net/DocumentCenter/View/9522/E-Land-Use-Element?bidId= (accessed July 26, 2023).

The current use of the project site is commercial, with two self-storage buildings and a parking lot. The approximately 1.93-acre project site is surrounded by a mixture of residential, commercial, and industrial uses. The proposed project site is immediately bounded to the west by Humor Drive, to the north by multifamily residential uses, to the east by single-family residential uses and commercial uses, and to the south by West Katella Avenue. The proposed project area and surrounding vicinity are characterized by flat topography and views comprised of a developed suburban environment that is built-out. There are no scenic views of the mountains or golf courses because of the distance from these resources and intervening land use.

The proposed project includes the construction of a two-story self-storage building that would be approximately 26 ft in height, which would be consistent with the City's height standards in the Municipal Code. While no designated scenic vistas are visible from the project site or surrounding properties, the proposed project would not block views of scenic vistas because it would not be substantially taller than the existing surrounding uses.

Therefore, because the proposed project constitutes an expansion to existing buildings in an already built-out area of the City and no identified scenic vistas are within its proximity, the proposed project would not have the potential to damage scenic vistas, and no mitigation would be required.

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

No Impact. According to the California Department of Transportation (Caltrans) Scenic Highway Mapping Program, there are no Designated or Proposed Scenic Highways in the vicinity of the project site.[4] The nearest State-designated scenic highway to the project site is a segment of State Route 91 (SR-91) located approximately 7 miles east. Due to distance and intervening land uses, no portion of the project site or surrounding area is viewable from the segment of the SR-91 that is State-designated. Further, the project site is currently developed and there are no scenic resources present (e.g., trees of significance, rock outcroppings, or historic buildings) on site. Therefore, implementation of the proposed project would not impact scenic resources within a State Scenic Highway. No mitigation is required.

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 a publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

No Impact. According to the United States Census Bureau, the City of Anaheim is located within the Los Angeles—Long Beach—Anaheim, CA Urbanized Area.[5] As described in the *State CEQA Guidelines*

[4] California Department of Transportation (Caltrans). 2021. California State Scenic Highway System Map. Website: https://www.arcgis.com/home/item.html?id=f0259b1ad0fe4093a5604c9b838a486a (accessed July 21, 2023).

[5] United States Census Bureau. 2010b. Los Angeles—Long Beach—Anaheim, CA Urbanized Area No. 51445. Website: https://www2.census.gov/geo/maps/dc10map/UAUC_RefMap/ua/ua51445_los_angeles--long_beach--anaheim_ca/DC10UA51445_000.pdf (accessed July 21, 2023).

Section 15387 and defined by the United States Census Bureau, an "urbanized area" is a central city or a group of contiguous cities with a population of 50,000 or more people, together with adjacent densely populated areas having a population density of at least 1,000 people per square mile.[6] Because the City is located in an urbanized area, the project site is also located within an urbanized area.

The project site is currently zoned for General Commercial (C-G) per the City of Anaheim Zoning Map.[7] Per Anaheim Municipal Code Section 18.08.030, with approval of a CUP, operation of self-storage facilities is permitted on parcels zoned C-G. The proposed project would comply with the regulations and standards established in the City of Anaheim Municipal Code Chapter 18.08 Commercial Zones, Chapter 18.46 Landscaping and Screening, and Chapter 18.42 Parking and Loading. 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.

No structures are being proposed that would diminish the existing visual character of the area or quality of public views of the site and its surroundings. The storage buildings would be consistent with the existing use of the site and the urban character of the proposed project area. Due to the residential and commercial land uses, and developed nature of the surrounding area, the proposed project would not substantially degrade the existing visual character or quality of the site and its surroundings, and no mitigation is required.

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

Less Than Significant Impact. Existing sources of night lighting attributed to nearby residential and commercial developments include streetlamps, accent lighting, parking lot lighting, and vehicle headlights. No nighttime construction is proposed and construction activities would be subject to Section 6.70.010 of the Anaheim Municipal Code[8], which restricts construction activities to between the hours of 7:00 a.m. and 7:00 p.m. Operation of the proposed project would include security and safety lighting, similar to the existing conditions on site. The proposed parking lot lighting would be subject to Anaheim Municipal Code Sections 18.42.090.030.0301 and 18.42.090.030.302, which requires a minimum lighting measurement of one foot-candle within a minimum 15:1 uniformity ratio and mandates light to be arranged to reflect the light away from adjoining residential premises and prevents lighting from exceeding 12 ft in height. Additionally, the City's Planning and Building Department would review any proposed lighting to ensure conformance with the California Green Building Standards Code (Part 11 of Title 24, California Code of Regulations) and the California Building Code, Title 24 (California Code of Regulations). These regulations would ensure that only the minimum amount of lighting is used and no light spillage occurs.

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6 United States Census Bureau. 2010a. Census Urban Area FAQs. Website: https://www.census.gov/programs-surveys/geography/about/faq/2010-urban-area-faq.html (accessed July 21, 2023).

7 City of Anaheim. 2022a. Zoning Map Title 18 Updated September 23. Website https://www.anaheim.net/DocumentCenter/View/1871/Zoning-Map?bidId= (accessed July 21, 2023).

8 City of Anaheim. 2023. Anaheim Municipal Code. Website: https://codelibrary.amlegal.com/codes/anaheim/latest/anaheim_ca/0-0-0-51668 (accessed July 27, 2023).

Sources of glare during the day result primarily from parked cars and reflective surfaces such as glass building materials. The proposed project includes a new self-storage building with windows that are typical of commercial uses and are unlikely to introduce a significant source of daytime glare. Lighting associated with the proposed project would conform to the City's lighting regulations and would be typical of safety and security lighting associated with commercial developments, including those in the project vicinity. Based on the above considerations, any source of glare caused by the proposed project would be minimal. The proposed project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area, and impacts would be less than significant. No mitigation is required.

4.2 AGRICULTURE AND FORESTRY RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

4.2.1 Impact Analysis

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

No Impact. According to the Orange County Important Farmland Map, the entire project site and surrounding area is designated as "Urban and Built Up Land." There is no Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance on the project site or in its vicinity.[9] Therefore, development of the proposed project would not result in any impacts to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and no impacts would occur. No mitigation is required.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Williamson Act was established to encourage the conservation of farmland and certain open space uses by way of lower property taxes to landowners of such property. According to the California Department of Conservation (DOC), the project site contains no parcels with agricultural

[9] California Department of Conservation (DOC). 2018. Orange County Important Farmland. Website: https://www.conservation.ca.gov/dlrp/fmmp/Pages/county_info.aspx (accessed July 21, 2023).

uses and does not contain any parcels with an active Williamson Act contract.[10] As discussed above, the project site is designated as Urban and Built Up Land. Further, the project site is not zoned for agricultural use. Therefore, the proposed project would not conflict with zoning designations for agricultural use or land currently under a Williamson Act contract. No impacts would occur and no mitigation is required.

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

No Impact. The project site is not zoned for, and does not contain, any forest land or timberland uses. Furthermore, there is no forest land or timberland within the vicinity of the project site. Therefore, the proposed project would not result in impacts to forestland or timberland. No mitigation is required.

d. Would the project result in the loss of forest land or conversion of forestland to non-forest use?

No Impact. The project site is not currently zoned or used for forest land or timberland and is located within an urbanized area. There are no forest or timberland resources on the project site and the proposed zoning would not permit such uses. Therefore, implementation of the proposed project would not result in the loss or conversion of forest land to a non-forest use. No mitigation is required.

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

No Impact. As stated above, there are no existing agricultural uses or forest lands on the project site. Therefore, development of the proposed project would not result in any changes in the environment that would result in the conversion of farmland or forests to non-agricultural use. No mitigation is required.

[10] California Department of Conservation (DOC). 2017. State of California Williamson Act Contract Land. Website: https://planning.lacity.org/eir/HollywoodCenter/Deir/ELDP/(E)%20Initial%20Study/Initial%20Study/Attachment%20B%20References/California%20Department%20of%20Conservation%20Williamson%20Map%202016.pdf (accessed July 21, 2023).

4.3 AIR QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

The impact analysis below is based on the Air Quality and Greenhouse Gas Technical Memorandum (2023a), prepared by LSA for the proposed project, which is provided in Appendix A of this document.

4.3.1 Impact Analysis

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The project site is located within the City of Anaheim, which is part of the South Coast Air Basin (Basin). The Basin includes all of Orange County and portions of Los Angeles, Riverside, and San Bernardino Counties. Air quality within the Basin is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). SCAQMD and the Southern California Association of Governments (SCAG) adopted the 2022 Air Quality Management Plan (2022 AQMP)[11] in December 2022.

Consistency with the 2022 AQMP for the Basin would be achieved if a project is consistent with the goals, objectives, and assumptions in the respective plan to achieve the federal and State air quality standards. Per the SCAQMD *CEQA Air Quality Handbook* (April 1993), there are two main indicators of a project's consistency with the applicable AQMP: (1) whether the project would increase 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 2016 AQMP; and (2) whether the project would exceed the 2022 AQMP's assumptions for 2037 or yearly increments based on the year of project buildout and phasing.

1. The project would not result in short-term construction and long-term operational pollutant emissions that exceed any emissions thresholds established by SCAQMD, as demonstrated under Response 4.3(b), below; therefore, the project would not result in an increase in the frequency or

[11] South Coast Air Quality Management District (SCAQMD). 2022. 2022 Air Quality Management Plan. Website: http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan (accessed October 20, 2023).

severity of an air quality standards violation or cause a new air quality standards violation. Therefore, the proposed project would be consistent with the first criterion.

2. The *CEQA Air Quality Handbook* indicates that consistency with AQMP growth assumptions must be analyzed for new or amended General Plan elements, Specific Plans, and significant projects. Significant projects include airports, electrical generating facilities, petroleum and gas refineries, designation of oil drilling districts, water ports, solid waste disposal sites, and offshore drilling facilities; therefore, the proposed project is not defined as significant. In addition, the City has determined that the project does not require a General Plan or Specific Plan Amendment. Therefore, the proposed project would be consistent with the second criterion.

Based on the consistency analysis presented above, the proposed project would be consistent with the regional AQMP, and impacts would be less than significant. No mitigation is necessary.

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?

Less Than Significant Impact. The proposed project is a part of the South Coast Air Basin, which is currently designated as non-attainment by federal standards for ozone (O_3) and particulate matter less than 2.5 microns in diameter ($PM_{2.5}$) and non-attainment by State standards for O_3, particulate matter less than 10 microns in diameter (PM_{10}), and $PM_{2.5}$. During construction, short-term degradation of air quality may occur due to the release of particulate matter emissions (i.e., fugitive dust) generated by grading, building construction, paving, and other activities. Emissions from construction equipment are also anticipated and would include carbon monoxide (CO), nitrogen oxides (NO_X), volatile organic compounds (VOCs), directly emitted $PM_{2.5}$ or PM_{10}, and toxic air contaminants such as diesel exhaust particulate matter.

Construction. Project construction activities would include demolition, grading, site preparation, building construction, architectural coating, and paving activities. Construction-related effects on air quality from the proposed project would be greatest during the site preparation phase due to the disturbance of soils. If not properly controlled, these activities would temporarily generate particulate emissions. Sources of fugitive dust would include disturbed soils at the construction site. Unless properly controlled, vehicles leaving the site would deposit dirt and mud on local streets, which could be an additional source of airborne dust after it dries. PM_{10} emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. PM_{10} emissions would also depend on soil moisture, silt content of soil, wind speed, and the amount of operating equipment. Larger dust particles would settle near the source, whereas fine particles would be dispersed over greater distances from the construction site.

Water or other soil stabilizers can be used to control dust, resulting in emissions reductions of 50 percent or more. SCAQMD has established Rule 403: Fugitive Dust, which would require the Applicant to implement measures that would reduce the amount of particulate matter generated during the construction period. In addition to dust-related PM_{10} emissions, heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, sulfur oxides (SO_X), NO_X, VOCs, and some soot particulate ($PM_{2.5}$ and PM_{10}) in exhaust emissions. If construction

activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles idle in traffic. These emissions would be temporary in nature and limited to the immediate area surrounding the construction site.

Construction emissions were estimated for the project using California Emissions Estimator Model (CalEEMod) and summarized in Table 4.3.A. Attachment A of the Air Quality and Greenhouse Gas Technical Memorandum, located in Appendix A, provides CalEEMod output sheets.

Table 4.3.A Short-Term Regional Construction Emissions

	Maximum Daily Regional Pollutant Emissions (lbs/day)							
Construction Phase	**VOCs**	**NO_X**	**CO**	**SO_X**	**Exhaust PM_{10}**	**Fugitive PM_{10}**	**Exhaust $PM_{2.5}$**	**Fugitive $PM_{2.5}$**
Demolition	2.3	35.6	32.2	<0.1	1.3	0.7	1.2	0.1
Site Preparation	1.9	29.4	25.7	<0.1	1.1	5.1	1.0	2.4
Grading	2.3	35.2	30.9	<0.1	1.3	5.9	1.2	2.8
Building Construction	1.7	23.2	21.9	<0.1	0.9	0.4	0.9	0.1
Paving	1.1	13.1	14.4	<0.1	0.1	0.3	0.5	0.1
Architectural Coating	4.5	2.0	2.4	<0.1	0.6	0.1	0.1	<0.1
Peak Daily Emissions	**6.2**	**35.6**	**32.2**	**0.1**	**7.2**		**4.0**	
SCAQMD Threshold	**75.0**	**100.0**	**550.0**	**150.0**	**150.0**		**55.0**	
Significant?	**No**	**No**	**No**	**No**	**No**		**No**	

Source: Compiled by LSA (May 2023).
Note = Some values may not appear to add correctly due to rounding. Maximum emissions of VOCs occurred during the overlapping building construction and architectural coating phases.
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOCs = volatile organic compounds

Based on the analysis results, the proposed project would not exceed daily emissions thresholds during construction for any criteria pollutant. Therefore, the proposed project would not lead to cumulatively considerable increases in construction emissions, and impacts would be less than significant. No mitigation is required.

Operation. Long-term air pollutant emissions associated with operation of the proposed project include emissions from area, energy, and mobile sources. Area-source emissions include architectural coatings, consumer products, and use of landscape maintenance equipment. Energy-source emissions result from activities in buildings that use electricity and natural gas. Mobile-source emissions are from vehicle trips associated with operation of the project. Area-source emissions consist of direct sources of air emissions at the project site, including architectural coatings, consumer products, and use of landscape maintenance equipment.

PM_{10} emissions result from running exhaust, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways. Entrainment of PM_{10} occurs when vehicle tires pulverize small rocks and pavement, and the vehicle wakes generate airborne dust. The contribution of tire and brake wear is small compared to the other particulate matter emissions

processes. Gasoline-powered engines have small rates of particulate matter emissions compared with diesel-powered vehicles.

Energy-source emissions result from activities in buildings that use natural gas. The proposed project would not include natural gas; therefore, the proposed project would not result in energy source emissions.

Long-term operational emissions associated with the proposed project were calculated using CalEEMod. Table 4.3.B provides the estimated existing emission estimates and the proposed project's estimated operational emissions.

Table 4.3.B Project Operational Emissions

Emission Type	Pollutant Emissions (lbs/day)					
	VOCs	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Mobile Sources	0.3	0.2	2.0	<0.1	0.2	<0.1
Area Sources	1.3	<0.1	0.0	<0.1	0.0	0.0
Energy Sources	0.0	0.0	0.0	0.0	0.0	0.0
Total Project Emissions	**1.5**	**0.2**	**2.0**	**<0.1**	**0.2**	**<0.1**
SCAQMD Threshold	55.0	55.0	550.0	150.0	150.0	55.0
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Compiled by LSA (May 2023).
Notes: Some values may not appear to add correctly due to rounding. Actual net new mobile source emissions would be less than estimated because the project would have 45 net new vehicle trips when compared to the existing uses.
CO = carbon monoxide
lbs/day = pounds per day
NO_x = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_x = sulfur oxides
VOCs = volatile organic compounds

The results shown in Table 4.3.B indicate that operation of the proposed project would not exceed the daily significance criteria for VOCs, NO_x, CO, SO_x, PM_{10}, or $PM_{2.5}$ emissions. Therefore, operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or State ambient air quality standard, and impacts would be less than significant. No mitigation is required.

Vehicular trips associated with the proposed project could contribute to congestion at intersections and along roadway segments in the vicinity of the proposed project site. Localized air quality impacts would occur when emissions from vehicular traffic increase as a result of the proposed project. The primary mobile-source pollutant of local concern is CO, a direct function of vehicle idling time and, thus, of traffic flow conditions. Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service or with extremely high traffic volumes. In areas with high ambient background CO concentrations, modeling is recommended to determine a project's effect on local CO levels.

An assessment of project-related impacts on localized ambient air quality requires that future ambient air quality levels be projected. Existing CO concentrations in the immediate project vicinity are not available. Ambient CO levels monitored at the Anaheim Air Monitoring Station located at 1630 W. Pampas Lane (the closest station to the project site), showed a highest recorded 1-hour

concentration of 2.4 parts per million (ppm) (the State standard is 20 ppm) and a highest 8-hour concentration of 1.7 ppm (the State standard is 9 ppm) from 2020 to 2022. The highest CO concentrations would normally occur during peak traffic hours; hence, CO impacts calculated under peak traffic conditions represent a worst-case analysis. Reduced speeds and vehicular congestion at intersections result in increased CO emissions.

The proposed project is expected to generate 77 average daily traffic (ADT), with 5 trips occurring in the AM peak hour and 8 trips occurring in the PM peak hour. As the proposed project would not generate 100 or more AM or PM peak hour trips, the proposed project did not meet the criteria for an evaluation of study area intersection or roadway segment level of service. Therefore, given the extremely low level of CO concentrations in the project area and the lack of traffic impacts at any intersections, project-related vehicles are not expected to result in CO concentrations exceeding the State or federal CO standards. No CO hot spots would occur, and the project would not result in any project-related impacts on CO concentrations.

For these reasons, the proposed project would not 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. Project impacts would be less than significant. No mitigation is required.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Sensitive receptors are defined as people who have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptor locations include schools, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential dwelling units. The closest sensitive receptors to the project site are the multi-family homes located approximately 110 ft away from the center of the project site. Other sensitive receptors include single-family homes located more than 110 ft to the east of the project site. A Localized Significance Threshold (LST) analysis was completed to show the construction and operational impacts at 25 meters (82 ft) to the nearest sensitive receptors to the project site in Source Receptor Area 17, based on a 5-acre daily disturbance area and a 3.5-acre project site. Tables 4.3.C and 4.3.D show the results of the LST analysis during project construction and operation, respectively.

Table 4.3.C: Project Localized Construction Emissions

Source	Pollutant Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
On-Site Emissions	35.2	30.6	6.8	3.9
Localized Significance Threshold	**149.0**	**984.0**	**9.5**	**5.5**
Significant?	**No**	**No**	**No**	**No**

Source: Compiled by LSA (May 2023).
Note: Source Receptor Area 17, based on a 3.5-acre construction disturbance daily area, at a distance of 82 feet from the project boundary.
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size

Table 4.3.D: Project Localized Operational Emissions

Source	Pollutant Emissions (lbs/day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
On-Site Emissions	<0.1	0.1	<0.1	<0.1
Localized Significance Thresholds	**149.0**	**984.0**	**2.5**	**1.5**
Significant?	**No**	**No**	**No**	**No**

Source: Compiled by LSA (May 2023).
Note: Source Receptor Area 17, based on a 3.5-acre operational daily area, at a distance of 82 feet from the project boundary.
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size

As detailed in Tables 4.3.C and 4.3.D, the emission levels indicate that the proposed project would not exceed SCAQMD LSTs during project construction or operation. The project's peak operational on-site NO_x emissions are less than 0.1 pounds per day (lbs/day). Due to the small size of the proposed project in relation to the overall Basin, the level of emissions is not sufficiently high enough to use a regional modeling program to correlate health effects on a Basin-wide level. On a regional scale, the quantity of emissions from the project is incrementally minor. Because the SCAQMD has not identified any other methods to quantify health impacts from small projects and due to the size of the project, it is speculative to assign any specific health effects to small project-related emissions. However, based on this localized analysis, the proposed project would not expose sensitive receptors to substantial pollutant concentrations. Project impacts would be less than significant, and no mitigation is required.

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. Heavy-duty equipment on the project site during construction would emit odors, primarily from equipment exhaust. However, the construction activity would cease after construction is completed. The nature of the proposed storage uses are not anticipated to emit any objectionable odors. No other sources of objectionable odors have been identified for the proposed project. Therefore, the proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. No mitigation is required.

4.4 BIOLOGICAL RESOURCES

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

4.4.1 Impact Analysis

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

Less Than Significant Impact. In its existing condition, there are two self-storage buildings and associated parking areas on the project site. The project site is entirely developed with commercial uses and located in an urban area and surrounded by developed single-family and multi-family residential neighborhoods and commercial areas. The United States Fish and Wildlife Service (USFWS) Critical Habitat for Threatened and Endangered Species map identifies the closest known critical habitat is located approximately 6.5 miles north of the project site at the Ralph B Clark Regional Park. Due to the developed character of the project site and its surroundings, no special-status species are anticipated to be directly affected by the project due to the lack of suitable habitat on the project site.

The project site contains ornamental landscaping and non-native trees located along the project boundaries, which could potentially support nests and roosting for bird species. However, if vegetation removal were to occur during the nesting bird season (January 1 through September 30), a pre-construction survey would be required to ensure that any active nests are identified and appropriate measures taken to ensure that impacts to nesting species are in compliance with regulations established in the Migratory Bird Treaty Act of 1918 (MBTA) (refer to Regulatory Compliance Measure RCM-BIO-1, below). The MBTA governs the taking and killing of migratory birds, their eggs, parts, and nests, and prohibits the take of any migratory bird, its eggs, parts, and nests. Compliance with this federal law would ensure project implementation would not impact nesting birds. No other impacts to candidate, sensitive, or special-status species are anticipated from implementation of the proposed project. No mitigation is required.

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?

No Impact. The project site is located in an urban area and is previously disturbed and developed with two self-storage buildings. It does not support any special-status or sensitive riparian habitat as identified in regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or USFWS.[12] Therefore, no impacts related to riparian habitat or other sensitive natural communities identified in a local or regional plan would result from project implementation, and no mitigation is required.

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

Less Than Significant Impact. According to the National Wetlands Inventory managed by the USFWS, the project site does not contain federally protected wetlands.[13] The project site is located entirely outside of streambeds, banks, and riparian habitat. No potential waters of the United States or CDFW jurisdictional areas are located on the project site, which is entirely developed with commercial uses and surrounded by development consisting of similar urban uses.

Although construction activities have the potential to result in temporary indirect effects to water quality, including a potential increase in erosion and sediment transport into downstream aquatic areas and the contamination of waters from construction equipment, these potential indirect effects to water quality would be avoided or substantially minimized through the implementation of Best Management Practices (BMPs) and the Stormwater Pollution Prevention Plan (SWPPP) as discussed in Section 4.10, Hydrology and Water Quality. Specifically, adherence to Regulatory Compliance Measures RCM-WQ-1 and RCM-WQ-2, provided in Section 4.10, would address erosion-related impacts during construction through implementation of construction site BMPs which would include,

[12] County of Orange. 2013a. General Plan Resources Element. Website: https://ocds.ocpublicworks.com/sites/ocpwocds/files/import/data/files/40235.pdf (accessed August 7, 2023).

[13] United States Fish & Wildlife Service (USFWS). n.d. National Wetlands Inventory Mapper. Website: https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/ (accessed August 7, 2023).

but not be limited to, Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on-site and Good Housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters. As specified in RCM-WQ-1 and RCM-WQ-2, the proposed project would comply with the requirements of the Construction General Permit and the City of Anaheim Municipal Code. With compliance with the requirements in the Construction General Permit and implementation of the construction BMPs as specified in RCM-WQ-1, construction impacts related to on- or off-site erosion would be less than significant. Therefore, there would be less than significant impacts on State or federally protected wetlands, and no mitigation is required.

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

Less Than Significant Impact. The project site is located in an urbanized area of the City that is developed with residential and commercial uses. Within the vicinity of the project site, there are no large areas of natural habitat that would facilitate migratory fish or wildlife movement or serve as a wildlife corridor. As described in Response 4.4.(a) above, construction of the proposed project would be required to comply with the MBTA through implementation of RCM-BIO-1. Compliance with this federal law would ensure that project implementation would not impact migratory wildlife. No mitigation is required.

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

No Impact. Ornamental trees are located along the project boundaries but no trees are located within proposed construction areas. It is possible that a few trees may require removal where the driveways are reconstructed to meet current standards. The City's General Plan Green Element does not contain a tree preservation policy, however, City Municipal Code Section 18.18.040 contains a tree preservation ordinance that only applies within the Scenic Corridor (SC) Overlay Zone. The project would be located within the General Commercial (C-G) zone and would not be subject to the tree preservation ordinance. In addition, it should be noted that these trees are non-native and are not considered sensitive biological resources. Therefore, the proposed project would not conflict with any local policies or ordinances protecting biological resources. No mitigation is required.

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. The project site is located in an urban area which is surrounded by commercial and residential land uses, and it is not located in an environmentally sensitive area. According to the California Department of Fish and Wildlife's (CDFW) California Regional Conservation Plans map[14], there are two Natural Community Conservation Plans (NCCPs) within the City: the County of Orange Central and Coastal Subregion NCCP/Habitat Conservation Plan (Central-Coastal NCCP/HCP) and the

[14] California Department of Fish & Wildlife (CDFW). 2019. California Natural Community Conservation Plans. Website: https://wildlife.ca.gov/conservation/planning/nccp/plans (accessed August 7, 2023).

Orange County Transportation Authority (OCTA) NCCP/HCP. The project site is not within the Central-Coastal NCCP/HCP.[15] Therefore, the proposed project would not conflict with this NCCP/HCP. The OCTA NCCP/HCP covers a majority of Orange County, including the City of Anaheim and the project site.[16] The OCTA NCCP/HCP's primary goal is to obtain authorization for the take of Covered Species under the Natural Community Conservation Planning Act and Endangered Species Act for the 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.

The proposed project does not propose or require development or activities that would conflict with the provisions of an adopted Habitat Conservation Plan or Natural Community Conservation Plan. Therefore, the proposed project would have no impact related to a conflict with an adopted Habitat Conservation Plan or Natural Community Conservation Plan. No mitigation is required.

4.4.2 Regulatory Compliance Measures

Regulatory Compliance Measure RCM-BIO-1

Compliance with Migratory Bird Treaty Act (MBTA). Tree and vegetation removal shall be restricted to outside the active nesting season (January 1 through September 30). If construction is proposed between January 1 and September 30, a qualified biologist familiar with local avian species and the requirements of the MBTA and the California Fish and Game Code shall conduct a pre-construction survey for nesting birds no more than 3 days prior to construction. The survey shall include the entire area that will be disturbed. The results of the survey shall be recorded in a memorandum and submitted to the City of Anaheim (City) Planning and Building Director, or his/her designee, within 48 hours. If the survey is positive, and the nesting species are subject to the MBTA or the California Fish and Game Code, the memorandum shall be submitted to the California Department of Fish and Wildlife (CDFW) to determine appropriate action. If nesting birds are present, a qualified biologist shall be retained to monitor the site during initial vegetation clearing and grading, as well as during other activities that would have the potential to disrupt nesting behavior. The

[15] California Department of Fish & Wildlife (CDFW). 2023a. NCCP Plan Summary – County of Orange (Central/Coastal) NCCP/HCP. Website: https://wildlife.ca.gov/Conservation/Planning/NCCP/Plans/Orange-Coastal (accessed August 7, 2023).

[16] California Department of Fish & Wildlife (CDFW). 2023b. NCCP Plan Summary – Orange County Transportation Authority NCCP/HCP. Website: https://wildlife.ca.gov/Conservation/Planning/NCCP/Plans/OCTA (accessed August 7, 2023).

monitor shall be empowered to halt construction work in the vicinity of the nesting birds if the monitor believes the nest is at risk of failure or the birds are excessively disturbed.

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4.5 CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

The impact analysis below for historic resources is based on the *Historic Resources Evaluation: Proposed Anaheim Extra Space Storage Project in Anaheim, California (*2023), prepared by LSA for the proposed project, which is provided in Appendix B of this document.

4.5.1 Impact Analysis

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

No Impact. As described earlier, the project site is currently developed with a 58,956 sq ft storage building and a 3,279 sq ft storage building. The archival research and intensive-level (pedestrian) field survey conducted for the site found that in 1962 the property was developed with a bank designed by master architect Stiles Clements and Robert Clements. Over time, the larger building has been extensively altered and expanded and no longer retains any characteristics that identify it as a bank or that associate it with the postwar (1945–1973) period. It was determined that the larger storage building does not meet the criteria for listing in the California Register of Historical Resources (California Register) or the City of Anaheim's criteria for designation as a Historically Significant Structure. Additionally, the smaller storage building on site is modern (less than 50 years old) and does not require evaluation for historical significance. As a result, no historic resources were found on site, and no impacts to historic resources would occur.

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

Less Than Significant with Mitigation Incorporated. According to the City of Anaheim General Plan EIR,[17] archaeological sites within the City are often located along creek areas, ridgelines, and vistas. Many of these landforms are located within the Hill and Canyon Area of the City. Archival research indicates a prehistoric resource area (CA-ORA-303) in the Hill and Canyon Area that has been identified and registered. This site is adjacent to State Route 91 (SR-91). The project site is located in West Anaheim which is approximately 7 miles west of the Hill and Canyon Area and the registered prehistoric resource. Additionally, a review of the Sacred Lands File database regarding the possibility

[17] City of Anaheim. 2004e. General Plan and Zoning Code Update EIR No. 330. Website: https://www.anaheim.net/932/EIR-No-330-Volume-I-FEIR (accessed July 24, 2023).

of Native American cultural resources and/or sacred places in the project vicinity that are not documented on other databases produced a negative result. As a result, the proposed project would not result in impacts related to this site. However, there is a potential to encounter unknown archaeological resources during construction excavation activities that extend 5–8 ft below ground surface. With implementation of Mitigation Measure MM-CUL-1, which requires archaeological monitoring during construction, potential impacts to unknown archaeological resources are reduced to less than significant.

c. Would the project disturb any humans remains, including those interred outside of formal cemeteries?

Less Than Significant Impact. As indicated above, a literature review concluded that no archaeological resources exist on the project site. If human remains are encountered at the project areas, California Health and Safety Code Section 7050.5 and *State CEQA Guidelines* Section 15064.5(e)(1) state that no further disturbance may occur to the area of the find until the County Coroner has made a determination of origin and disposition of the human bone pursuant to Public Resources Code Section 5097.98. Regulatory Compliance Measure RCM-CUL-1 would ensure that potential impacts to unknown human remains during construction are less than significant.

4.5.2 Regulatory Compliance Measure

Regulatory Compliance Measure RCM-CUL-1

Human Remains. In the event that human remains are encountered on the project site, work within 50 feet of the discovery shall be redirected and the County Coroner notified immediately consistent with the requirements of California Code of Regulations (CCR) Section 15064.5(e). State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code (PRC) Section 5097.98. If the remains are determined to be Native American, the County Coroner shall notify the Native American Heritage Commission (NAHC), which shall determine and notify a Most Likely Descendant (MLD). With the permission of the City of Anaheim (City), the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Consistent with CCR Section 15064.5(d), if the remains are determined to be Native American and an MLD is notified, the City shall consult with the MLD as identified by the NAHC to develop an

agreement for treatment and disposition of the remains. Prior to the issuance of grading permits, the City Engineer, or designee, shall verify that all grading plans specify the requirements of CCR Section 15064.5(e), State Health and Safety Code Section 7050.5, and PRC Section 5097.98, as stated above.

4.5.3 Mitigation Measures

The following mitigation measure is required to reduce cultural resource impacts to a less than significant level:

Mitigation Measure MM-CUL-1

Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.

- The property owner/developer or contractor as designee shall provide evidence in the form of an executed Agreement to the City of Anaheim Planning and Building Department that they have retained a qualified Native American tribal monitor to provide third-party monitoring during construction-related ground disturbance activities and to recover and catalogue tribal resources as necessary. The tribal monitor shall be from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The agreement shall include (i) professional qualifications of the Native American monitor; (ii) detailed scope of services to be provided including, but not limited to, pre-construction education, observation, evaluation, protection, salvage, notification, and/or curation requirements, as applicable, with final documentation/report to the Public Works Inspector; (iii) contact information; (iv) communication protocols between contractor and monitor for scheduling to facilitate timely performance; (v) acknowledgment that if the tribal monitor is unavailable or unresponsive based on terms stipulated in the agreement, property owner/developer or contractor as designee may contract with another qualified tribal monitor acceptable to the City. The selection of the qualified professional(s) shall be subject to City acceptance based on generally accepted professional qualifications and

certifications, as applicable. The cover sheet of the grading plans shall include a note to identify that third party tribal monitoring is required during excavation and grading activities in accordance with the City-approved Agreement. Contact information for the approved tribal monitor shall be provided by the contractor to the City inspector at the pre-construction meeting.

4.6 ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in a 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?	☐	☐	☐	☒

The following analysis is based on the Air Quality and Greenhouse Gas Technical Memorandum (2023a), prepared by LSA for the proposed project, which is provided in Appendix A of this document.

4.6.1 Impact Analysis

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

Less Than Significant Impact. The proposed project includes the demolition of a 3,279 sq ft one-story self-storage building and 57 RV/boat/vehicle storage parking spaces and the construction of a 52,661 sq ft self-storage facility containing 588 storage units. Construction of the proposed project would require site preparation, demolition, grading, building construction, paving, and architectural coating activities. Construction of the proposed project would require energy for the manufacture and transportation of construction materials, preparation of the site for grading and building activities, and construction of the building.

Operational energy-source emissions would result from activities in buildings that use electricity and natural gas. The proposed project does not include natural gas. Anaheim Public Utilities provides electricity to the project area. The project's annual energy demand would total 275,051 kilowatt-hours (kWh).[18] According to the City, Anaheim Public Utilities provided an annual total output of 2,682,356 megawatt-hours (MWh) during the 2021/2022 fiscal year.[19] Specifically, commercial electricity demand was 706,203 MWh. The proposed project's increase in electricity demand would represent a 0.04 percent[20] increase compared to overall demand in the Anaheim Public Utilities' service area. Therefore, projected electrical demand would not significantly affect its 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 building permit issuance, the City of Anaheim Planning and Building Department would review and verify that the project plans comply with the current

18 CalEEMod version 2022.1.12.

19 City of Anaheim. 2023b. About Electric Services. Website: https://www.anaheim.net/2104/About-Electric-Services (accessed July 31, 2023).

20 1 MWh = 1,000 kWh. 275,051 kWh (1MW/1,000 kWh) = 275.051 MWh. 275.051 MWh/706,203 MWh = .00038 or 0.04%.

version of the Building and Energy Efficiency Standards. The project would also be required to adhere to the California Green Building Standards Code (CALGreen Code) 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. Therefore, the project would have a less than significant impact related to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. No mitigation is required.

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

No Impact. On October 7, 2015, Governor Brown signed Senate Bill (SB) 350 (Clean Energy and Pollution Reduction Act of 2015) into law. Among its requirements, SB 350 requires certain publicly-owned utilities, including Anaheim Public Utilities, to adopt and file an Integrated Resources Plan (IRP) no less than once every five years. On May 15, 2018, Anaheim's City Council approved the Anaheim Public Utilities' 2018 IRP, which expanded the procurement of renewable energy resources to serve Anaheim electric customers from 33 percent to 50 percent renewable energy by 2030, consistent with the mandates of SB 350. Anaheim City Council approved and adopted the 2023 IRP on May 16, 2023. The 2023 IRP offers a framework showing how Anaheim Public Utilities will transition away from carbon-intensive resources, to clean renewable sources.[21]

As indicated above, energy usage on the project site during construction would be temporary in nature and would be relatively small in comparison to the overall use in the County. In addition, energy usage associated with operation of the proposed project would be relatively small in comparison to the overall use in Orange County, and the State's available energy resources. Because California's energy conservation planning actions are conducted at a regional level, and because the proposed project's total impact on regional energy supplies would be minor, the proposed project would not conflict with or obstruct California's energy conservation plans or the City of Anaheim's 2023 IRP. Additionally, as demonstrated above under Threshold 4.6 (a), the proposed project would not result in the inefficient, wasteful, and unnecessary consumption of energy. There would be no potential impacts related to conflict with or obstruction of a State or local plan for renewable energy or energy efficiency, and no mitigation is required.

[21] Anaheim Public Utilities. 2023a. 2023 Integrated Resource Plan. Website: https://www.anaheim.net/4864/Integrated-Resource-Plan (accessed July 31, 2023).

4.7 GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
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?	☐	☐	☒	☐

The analysis is based on the *Geotechnical Site Evaluation and Storm Water Infiltration Test Report* (2023), prepared by Gorian & Associates, Inc. for the proposed project, which is provided in Appendix C of this document.

4.7.1 Impact Analysis

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

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

Less Than Significant Impact. According to the Alquist-Priolo Earthquake Fault Zones delineated by the California Geological Survey (CGS), there are no known active earthquake faults on the project

site.[22] The nearest zoned fault to the project site is the Newport-Inglewood-Rose Canyon Fault, located 8.7 miles southwest. The City of Anaheim, as well as most of Southern California, is located in a region of historic seismic activity. The City would impose regulatory controls to address potential seismic hazards and the project would be subject to the California Building Code (CBC), as adopted by the City's Planning and Building Department. The CBC contains specific requirements for seismic safety, excavation, foundations, retaining walls, and site demolition. It also regulates grading activities, including drainage and erosion control. Conformance with these engineering practices and design criteria would reduce the effects of seismic ground shaking. Therefore, impacts would be less than significant, and no mitigation is required.

ii. Strong seismic ground shaking?

Less Than Significant Impact. As with all of Southern California, the project site is subject to groundshaking resulting from earthquakes on nearby faults. Secondary effects of seismic shaking resulting from large earthquakes on the major faults in the Southern California region, which may affect the site, include ground lurching and shallow ground rupture, soil liquefaction, and dynamic settlement. As discussed previously, the site is not located within an Alquist-Priolo Earthquake Fault Zone. However, the Newport-Inglewood-Rose Canyon Fault is located approximately 8.7 miles southwest of the site and is capable of producing strong ground motion. As described in Response 4.7.1(a)(i), the proposed project would be designed in accordance with CBC requirements that address structural seismic safety. Project conformance with CBC and local requirements relative to grading and construction would ensure that the proposed project does not result in exposure of people or structures to potentially substantial adverse effects involving strong seismic ground shaking. Therefore, impacts would be less than significant, and no mitigation is required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a phenomenon where earthquake-induced ground vibrations increase the pore pressure in saturated, granular soils until it is equal to the confining, overburdened pressure. When this occurs, the soil can completely lose its shear strength and enter a liquefied state. Liquefaction typically occurs below water tables, however after liquefaction occurs, the liquefied soil/water matrix can propagate upward into overlying non-saturated soil as excess pore water dissipates. The project site is not within a state-designated Zone of required investigation for liquefaction according to the CGS.[23] As described in Response 4.7(a)(i), the proposed project would be designed in accordance with CBC requirements that address structural seismic safety. As such, implementation of the proposed project would not expose people or structures to substantial adverse effects related to the risk of seismic-related failure or liquefaction. Therefore, impacts would be less than significant, and no mitigation is required.

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[22] California Department of Conservation (DOC). 2019. California Earthquake Hazards Zone Application. Website: https://maps.conservation.ca.gov/cgs/EQZApp/app/ (accessed July 31, 2023).

[23] Ibid.

iv. Landslides?

No Impact. Seismically induced landslides and other slope failures are common occurrences during or soon after earthquakes in areas with significant ground slopes. The project site is relatively flat, and there are no substantial hillsides or unstable slopes immediately adjacent to the site boundary. The project site is not within an area with the potential for earthquake-induced landslides according to the CGS.[24] As described in Response 4.7(a)(i), the proposed project would be designed in accordance with CBC requirements that address structural seismic safety. As such, implementation of the proposed project would not expose people or structures to substantial adverse effects related to the risk of seismic-related failure (e.g., liquefaction or landslides). Therefore, the project would have no impacts related to landslides, and no mitigation is required.

b. Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Construction of the proposed project would require grading and other soil-disturbing construction activities. These construction activities may result in increased potential for soil erosion and siltation compared to existing conditions. Additionally, during a storm event, soil and siltation could occur at an accelerated rate. The proposed project would be required to comply with the Construction General Permit, which requires preparation of a Storm Water Pollution Prevention Plan (SWPPP) (see Regulatory Compliance Measure RCM-WQ-1, in Section 4.10, Hydrology and Water Quality). The SWPPP would detail Erosion Control and Sediment Control Best Management Practices (BMPs) to be implemented during project construction to minimize erosion and retain sediment on site. With compliance with the requirements of the Construction General Permit and with implementation of the construction BMPs, construction impacts related to on-site erosion during construction would be less than significant, and no mitigation is required.

As discussed in Section 4.10, the proposed project would not increase the amount of impervious area of the project site, therefore, on-site stormwater flows would not increase. These impervious surface areas would not be prone to erosion or siltation because they would not include any loose soil. Therefore, on-site erosion impacts would be minimal. For these reasons, operational impacts related to substantial on-site erosion would be less than significant, and no mitigation is required.

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

Less Than Significant Impact. Landslides and other forms of mass wasting, including mud flows, debris flows, and soil slips occur as soil moves downslope under the influence of gravity. Landslides are frequently triggered by intense rainfall or seismic shaking. Because the project site is located in a relatively flat area with no significant slopes nearby, landslides or other forms of natural slope instability do not represent a significant hazard to the project. In addition, as stated above, the site is

[24] California Department of Conservation (DOC). 2019. California Earthquake Hazards Zone Application. Website: https://maps.conservation.ca.gov/cgs/EQZApp/app/ (accessed July 31, 2023).

not within a State-designated hazard zone for an earthquake-induced landslide. Therefore, there would be no impacts related to landslides, and no mitigation is required.

Lateral spreading often occurs on very gentle slopes or flat terrain. The dominant mode of movement is lateral extension accompanied by shear or tensile fracture. This failure is caused by liquefaction and is usually triggered by rapid ground motion, such as that experienced during an earthquake, but can also be artificially induced. When coherent material, either bedrock or soil, rests on materials that liquefy, the upper units may undergo fracturing and extension and may then subside, translate, rotate, disintegrate, or liquefy and flow. The project site is not located in a liquefaction zone, and therefore, lateral spreading is not a potential concern with respect to the proposed project. Potential impacts related to lateral spreading would be less than significant, and no mitigation is required.

Subsidence refers to broad-scale changes in the elevation of land. Common causes of land subsidence are pumping water, oil, and gas from underground reservoirs; dissolution of limestone aquifers (sinkholes); collapse of underground mines; drainage of organic soils; and initial wetting of dry soils (hydrocompaction). Subsidence is also caused by heavy loads generated by large earthmoving equipment. Construction dewatering is not anticipated to be required. The project site is not located within an area of known subsidence that may be associated with groundwater, peat loss, or oil extraction. Therefore, potential geotechnical hazards related to subsidence would be less than significant, and no mitigation is required.

Provided that design and remedial grading and ground improvement (as necessary) are performed in accordance with the applicable requirements in the California Building Code (adopted by the City as its Building Code with certain amendments), excessive settlement resulting from compression of existing undocumented fill on the project site would be reduced to a less than significant level. No mitigation is required.

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?

Less Than Significant Impact. Expansive soils contain types of clay minerals that occupy considerably more volume when they are wet or hydrated than when they are dry or dehydrated. Volume changes associated with changes in the moisture content of near-surface expansive soils can cause uplift or heave of the ground when they become wet or, less commonly, cause settlement when they dry out. Based on findings of the *Geotechnical Site Evaluation and Storm Water Infiltration Test Report* (Appendix C)[25], an expansion test conducted on the upper soils within the site identified them as non-expansive. Soil expansion and collapse potentials were considered to have negligible impacts on project design and construction. Therefore, potential impacts related to expansive soils would be less than significant, and no mitigation is required.

[25] Gorian & Associates Inc. 2023. *Geotechnical Site Evaluation and Storm Water Infiltration Test Report*. March.

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The proposed project would not use septic tanks or alternative wastewater disposal systems. The proposed project would connect to existing sanitary sewer and wastewater facilities, which will conform to the requirements of Anaheim Public Utilities. Compliance with the California Building Code currently in effect and preparation of site-specific geology and soils engineering studies would ensure that the proposed project would not result in impacts related to substantial soil erosion, unstable soils, expansive soils, or soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems. No mitigation is required.

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

Less Than Significant Impact. The project site is located within an urbanized area that has been previously graded and paved. Due to previous development on the project site, any paleontological resources or unique geologic features that may have been present at one time would likely have been previously disturbed and therefore the likelihood of encountering intact resources is low. Excavation activities are not expected to extend more than 13 ft below ground surface (bgs); however, in the event that unanticipated fossil discovery occurs during construction or excavation, implementation of Regulatory Compliance Measure RCM-GEO-1 would reduce potential impacts to a less than significant level. No mitigation is required.

4.7.2 Regulatory Compliance Measures

Regulatory Compliance Measure RCM-GEO-1

Discovery of Paleontological Resources. In the event that Paleontological Resources are encountered during construction, in accordance with Society of Vertebrate Paleontology (SVP) 2010 guidelines, no further disturbance shall occur until a qualified professional paleontologist is notified and retained to evaluate the discovery. The retained paleontologist shall determine the significance of the discovery and determine if additional mitigation or treatment is warranted. Development in the area of discovery shall resume when the discovered resource is properly documented, and authorization is given to resume construction work. Any significant paleontological resources found during construction monitoring shall be prepared, identified, analyzed and permanently curated in an approved regional museum repository.

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4.8 GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

The impact analysis below is based on the results of the *Air Quality and Greenhouse Gas Technical Memorandum* (2023a), prepared by LSA for the proposed project, and included as Appendix A.

4.8.1 Impact Analysis

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. Construction activities associated with the proposed project would produce combustion emissions from various sources. Construction would emit greenhouse gases (GHGs) through the operation of construction equipment and from worker and builder supply vendor vehicles for the duration of the approximately 12-month construction period. The combustion of fossil-based fuels creates GHGs such as carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). Furthermore, the fueling of heavy equipment emits CH_4. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

The Southern California Air Quality Management District (SCAQMD) does not have an adopted threshold of significance for construction-related GHG emissions. However, lead agencies are required to quantify and disclose GHG emissions that would occur during construction. The SCAQMD then requires the construction GHG emissions to be amortized over the life of the project, defined as 30 years, added to the operational emissions, and compared to the applicable interim GHG significance threshold.

Based on the California Emissions Estimator Model (CalEEMod), it is estimated that the project would generate 542.0 metric tons of carbon dioxide equivalent (MT CO_2e) during construction of the project. When amortized over the 30-year life of the project, annual emissions would be 18.1 MT CO_2e.

Long-term operation of the proposed project would generate GHG emissions from area, mobile, waste, and water sources as well as indirect emissions from sources associated with energy consumption. Area-source emissions would be associated with activities such as landscaping and maintenance on the project site and other sources. Mobile-source GHG emissions would include project-generated vehicle trips associated with trips to the proposed project. Waste source emissions generated by the proposed project include energy generated by landfilling and other methods of disposal related to transporting and managing project-generated waste. In addition, water source

emissions associated with the proposed project are generated by water supply and conveyance, water treatment, water distribution, and wastewater treatment.

GHG emissions were estimated using CalEEMod. Table 4.8.A shows the estimated operational GHG emissions for the proposed project.

Table 4.8.A Greenhouse Gas Emissions

Emission Type	Operational Emissions (metric tons per year)				
	CO_2	CH_4	N_2O	CO_2e	Percentage of Total
Mobile Sources	83.0	<0.1	<0.1	84.3	29
Area Source	<0.1	<0.1	<0.1	<0.1	<1
Energy Source	130.0	<0.1	<0.1	131.0	46
Water Source	42.9	0.4	<0.1	55.7	20
Waste Source	4.4	0.4	0.0	15.3	5
Total Operational Emissions				**286.3**	**100.0**
Amortized Construction Emissions				18.1	—
Total Annual Emissions				**304.4**	**—**
SCAQMD Tier 3 GHG Numerical Screening Threshold				**3,000.0**	
Exceedance?				**No**	

Source: LSA (May 2023).
CH_4 = methane
CO_2 = carbon dioxide
CO_2e = carbon dioxide equivalent
GHG = greenhouse gas
N_2O = nitrous oxide
SCAQMD = South Coast Air Quality Management District

As shown in Table 4.8.A, energy emissions are the largest source of GHG emissions for the project at approximately 46 percent of the project total. Mobile sources are the next largest category at approximately 29 percent. Water and waste sources are about 20 percent and 5 percent of the total emissions, respectively.

A project would have less than significant GHG emissions if it would result in operational-related GHG emissions of less than the scaled SCAQMD threshold of 3,000 MT CO_2e per year. Based on the analysis results, the proposed project would result in approximately 304.4 MT CO_2e per year over the existing conditions. Therefore, operation of the proposed project would not generate significant GHG emissions that would have a significant effect on the environment.

For these reasons, the proposed project would not generate significant GHG emissions that would have a significant effect on the environment. Project impacts would be less than significant and no mitigation is required.

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 Anaheim Public Utilities Department (APUD) has an adopted Greenhouse Gas Reduction Plan (GHGRP)[26] that identifies renewable energy and energy conservation targets for APUD. Therefore, the proposed project was analyzed for consistency with the goals of

[26] Anaheim Public Utilities Department (APUD). 2020. Greenhouse Gas Reduction Plan. May.

APUD's GHGRP, the California Air Resources Boards' (CARB) 2022 Scoping Plan[27] and the Southern California Association of Governments' (SCAG) 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).[28]

APUD GHGRP. APUD's GHGRP, approved in 2015, and updated in 2020, identifies renewable energy and energy conservation targets for APUD for the years 2020, 2030, and 2045. The GHGRP identifies renewables portfolio targets for increasing the APUD power supply generated from renewable sources up to 33 percent by year 2020, 60 percent by year 2030, and 100 percent by 2045. The GHG Reduction Plan also establishes transportation-related goals for APUD to convert its fleet vehicles to result in emissions reductions of 500 MT CO_2e in 2020, 1,200 MT CO_2e in 2030, and 32,000 MT CO_2e in 2045. APUD also encourages customers to utilize electric vehicles to reduce GHG emissions.

Specific energy and energy conservation targets identified in APUD's GHGRP would not directly apply to the proposed project. However, APUD is the private utility that would supply the proposed project's electricity and natural gas services. In addition, APUD plans to continue to provide reliable service to their customers and upgrade their distribution systems as necessary to meet future demand, which would reduce GHG emissions. The proposed project would not conflict with the APUD GHGRP.

2022 Scoping Plan. Executive Order (EO) B-30-15 added the immediate target of reducing GHG emissions to 40 percent below 1990 levels by 2030. CARB released a second update to the Scoping Plan, the 2017 Scoping Plan,[29] to reflect the 2030 target set by EO B-30-15 and codified by Senate Bill (SB) 32. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reductions target of at least 40 percent below 1990 levels by 2030 contained in EO B-30-15. SB 32 builds on Assembly Bill (AB) 32 and continues to work toward achieving the State's 2050 objective of reducing emissions to 80 percent below 1990 levels. The companion bill to SB 32, AB 197, provides additional direction to CARB related to the adoption of strategies to reduce GHG emissions. Additional direction in AB 197 intended to provide easier public access to air emissions data that are collected by CARB was posted in December 2016.

In addition, the 2022 Scoping Plan assesses progress toward the statutory 2030 target, while laying out a path to achieving carbon neutrality no later than 2045. The 2022 Scoping Plan focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

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27 California Air Resources Board (CARB). 2022. 2022 Scoping Plan for Achieving Carbon Neutrality. Website: https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents#:~:text=The%202022%20Scoping%20Plan%20Update%20focuses%20on%20outcomes%20needed%20to,economic%2C%20environmental%2C%20energy%20security%2C (accessed July 25, 2023).

28 Southern California Association of Governments (SCAG). 2020. 2020-2045 Regional Transportation Plan/ Sustainable Communities Strategy. Website: https://scag.ca.gov/read-plan-adopted-final-connect-socal-2020 (accessed July 25, 2023).

29 California Air Resources Board (CARB). 2017. *California's 2017 Climate Change Scoping Plan*. November.

The measures applicable to the proposed project include energy efficiency measures, water conservation and efficiency measures, and transportation and motor vehicle measures, as discussed below. The proposed project would comply with the 2019 California Green Building Standards Code (CALGreen Code) standards, regarding energy conservation and green building standards. In addition, the proposed project would be all-electric, and no natural gas demand is anticipated during construction or operation of the proposed project. Therefore, the proposed project would comply with applicable energy measures. In addition to the requirement for the project to be compliant with the 2019 CALGreen Code standards, which include measures related to the reduction of wastewater and water use, the proposed project would be required to comply with the California Model Water Efficient Landscape Ordinance. Therefore, the proposed project would not conflict with any of the water conservation and efficiency measures. Specific regional emission targets for transportation emissions would not directly apply to the proposed project. The Advanced Clean Car Standards I and II require all new passenger cars, trucks, and SUVs sold in California to meet increasingly stringent requirements regarding zero emissions technologies and emissions standards. These standards apply to new passenger cars, trucks, and SUVs and would not apply to the proposed project itself. Therefore, the proposed project would not conflict with the identified transportation and motor vehicle measures.

The proposed project would comply with existing State regulations adopted to achieve the overall GHG emissions reduction goals identified in CARB's 2022 Scoping Plan.

SCAG's RTP/SCS. SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) identifies that land use strategies that focus on new housing and job growth in areas served by high-quality transit and other opportunity areas would be consistent with a land use development pattern that supports and complements the proposed transportation network. The core vision in the 2020–2045 RTP/SCS is to better manage the existing transportation system through design management strategies, integrate land use decisions and technological advancements, create complete streets that are safe to all roadway users, preserve the transportation system, and expand transit and foster development in transit-oriented communities. The 2020–2045 RTP/SCS does not require that local General Plans, Specific Plans, or zoning be consistent with the 2020–2045 RTP/SCS but provides incentives for consistency for governments and developers.

The proposed project would not conflict with the stated goals of the RTP/SCS; therefore, the proposed project would not interfere with SCAG's ability to achieve the region's GHG reduction targets at 8 percent below 2005 per capita emissions levels by 2020 and 19 percent below 2005 per capita emissions levels by 2035, and it can be assumed that regional mobile emissions will decrease in line with the goals of the RTP/SCS. Furthermore, the proposed project is not regionally significant per *State CEQA Guidelines* Section 15206, and, as such, it would not conflict with the SCAG RTP/SCS targets since those targets were established and are applicable on a regional level.

Therefore, the proposed project would not conflict with plans, policies, or regulations adopted for the purpose of reducing GHG emissions, and impacts would be less than significant. No mitigation is required.

4.9 HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Section 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 2 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?	☐	☐	☒	☐

The impact analysis below is based on the results of the *Phase I Environmental Site Assessment* (ESA) (2021), prepared by AES Due Diligence, Inc. for the proposed project, and included as Appendix F.

4.9.1 Impact Analysis

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. Hazardous materials are chemicals that could potentially cause harm during an accidental release or mishap, and are defined as being toxic, corrosive, flammable, reactive, and irritant, or strong sensitizer.[30] Hazardous substances include all chemicals regulated under the United States Department of Transportation "hazardous materials" regulations and the United States Environmental Protection Agency (USEPA) "hazardous waste" regulations. These hazardous wastes

[30] A "sensitizer" is a chemical that can cause a substantial proportion of people or animals to develop an allergic reaction in normal tissue after repeated exposure to a chemical (United States Department of Labor, Occupational Safety and Health Administration. 2013. Appendix A to Section 1910.1200, Health Hazard Criteria. Website: https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.1200AppA [accessed July 24, 2023]).

require special handling and disposal because of their potential to damage public health and the environment. The probable frequency and severity of consequences from the routine transport, use, or disposal of hazardous materials are affected by the type of substance, the quantity used or managed, and the nature of the activities and operations.

Construction. During demolition and construction activities for the proposed project, there is a possibility of generating small quantities of hazardous materials. The construction phase of the proposed project would include the transport, storage, and short-term use of petroleum-based fuels, lubricants, pesticides, and other similar materials. The amount of hazardous chemicals present during construction is limited and would be in compliance with existing government regulations, such as the Hazardous Materials Transportation Act, the Resource Conservation and Recovery Act, and the California Code of Regulations (CCR, Title 22).

Any associated risk would be adequately reduced to a level that is less than significant through compliance with these standards and regulations; thus, the limited use and storage of hazardous materials during construction of the proposed project would not pose a significant hazard to the public or the environment. Accordingly, the potential for the release of hazardous materials during project construction would be low and, even if a release were to occur, it would not result in a significant hazard to the public, surrounding land uses, or environment due to the small quantities of these materials associated with construction. No mitigation would be required.

Operation. The project proposes the construction of a two-story, 52,661 sq ft self-storage facility to replace of the existing single-story, 3,279 sq ft self-storage facility and 57 RV/boat/vehicle storage parking spaces. 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. As described in the leasing agreements required for customers of the storage facilities, storage of hazardous materials is not permitted. The hazardous materials used during operations would be stored off site and would be handled and disposed of in accordance with applicable regulations. Anaheim Fire and Rescue routinely provides inspections to ensure the safe storage, management, and disposal of any hazardous materials in accordance with federal, State, and local regulations.[31] Therefore, the proposed project would result in a less than significant impact with regard to the routine transport, use, or disposal of hazardous material. No mitigation is required.

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 proposed project would involve construction activities including removal of existing pavement, grading, site preparation, and landscaping associated with existing storage facility and parking spaces. During construction activities that would redevelop the project

[31] Anaheim Fire & Rescue. 2012. What is a Certified Unified Program Agency (CUPA). Website: https://www.anaheim.net/DocumentCenter/View/1333/CUPA-Brochure-?bidId= (accessed October 24, 2023).

site, the Applicant would be required to comply with relevant applicable federal, state, and local laws and regulations that pertain to hazardous materials and waste during construction and operation of the proposed project.

According to the Phase I ESA, there is no evidence of releases (i.e., stained soil or surfaces or stressed vegetation) or threatened releases of hazardous substances on, at, in, or near to the project site. Therefore, the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant. No mitigation is required.

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?

No Impact. The nearest existing schools to the project site are Lake Intermediate School and Simmons Elementary School, located approximately 0.5 mile south of the project site along Orangewood Avenue, James Madison Elementary School, located approximately 0.5 mile northwest of the project site along Cerritos Avenue, and Loara High School, located approximately 0.5 mile north of the project site along Cerritos Avenue. As previously stated, the proposed project would not result in a significant hazard affecting the public during project construction or operation. Furthermore, operation of the proposed project would not result in significant impacts associated with hazardous materials because all materials would be handled, stored, and disposed of in accordance with applicable standards and regulations. Therefore, because the proposed project does not involve activities that would result in the emissions of hazardous materials or acutely hazardous substances, and because the closest school is greater than 0.25 mile away from the project site, no impacts would occur and no mitigation is required.

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

No Impact. According to the California Department of Toxic Substances Control (DTSC) EnviroStor database, the project site is not located on a federal superfund site, State response site, voluntary cleanup site, school cleanup site, corrective action site, or tiered permit site.[32] Two sites were identified within 1 mile of the project site including Loara High School, located approximately 0.5 mile from the project site, and Anawood Cleaners, located approximately 0.9 mile from the project site. Due to the sites' regulated nature, neither was found to represent an environmental concern to the project. Review of the State Water Resources Control Board (SWRCB) GeoTracker database confirms that the project site is not on a Leaking Underground Storage Tank (LUST) Cleanup site.[33] There are ten LUST sites within 0.50 mile of the project site, however, four are beyond the 0.25-mile radius and do not appear to represent an environmental concern to the project site. These sites have been completed and classified as "case-closed." The project site is not located on a list of solid waste

[32] California Department of Toxic Substances Control (DTSC). EnviroStor Database. Website: https://www.envirostor.dtsc.ca.gov/public/map/?global_id=19970011 (accessed July 24, 2023).

[33] State Water Resources Control Board (SWRCB). GeoTracker database. Website: https://geotracker.waterboards.ca.gov/map/ (accessed July 24, 2023).

disposal sites identified by the SWRCB with waste constituents above hazardous waste levels outside the waste management unit[34] or active cease and desist orders and cleanup and abatement orders.[35] The Phase I ESA corroborates that the project site is not listed on any federal, tribal, or State-equivalent databases for hazardous sites. All use, storage, transport and disposal of hazardous materials (including any small amounts of hazardous wastes) during construction and operational activities will be performed in accordance with existing local, State, and federal hazardous materials regulations. Because the project site is not listed on the DTSC Hazardous Waste and Substances Site List (Cortese List, compiled pursuant to Section 65962.5 of the Government Code),[36] no impacts related to this topic would occur. No mitigation is required.

e. Would the project be located within an airport land use plan or, where such a plan has not been adopted, within 2 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 airport closest to the project site is Fullerton Municipal Airport, located approximately 4.75 miles northwest of the project site. The proposed project is not within an airport land use plan or within 2 miles of a public airport or public use airport, and therefore would not result in impacts to safety or excessive noise for people residing or working in the project area. No mitigation is required.

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 City of Anaheim approved its Emergency Operations Plan (EOP) in June 2017,[37] which establishes a comprehensive framework of policy and guidance for emergency and disaster response operations. The City approved the Local Hazard Mitigation Plan in May 2022, which identifies evacuation routes in the Anaheim Hills areas, which are more prone to wildfire risk compared to the rest of the City. In general, major arterials and highways serve as evacuation routes. The project site is not located in the Anaheim Hills area and would not impede the flow of traffic on nearby major streets or highways.

During short-term construction activities, all construction equipment would be staged within the project site. Although the proposed project is not anticipated to result in any substantial traffic queuing on nearby streets, all large construction vehicles entering and exiting the site would be guided by the use of personnel to avoid vehicle queuing. The proposed project does not include any permanent changes to public or private roadways that would physically impair or otherwise conflict with the City's Emergency Operations Plan or another adopted emergency response plan or emergency evacuation plan. Further, the proposed project would not permanently obstruct or alter

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34 California Environmental Protection Agency (CalEPA). n.d.-b. Sites Identified with Waste Constituents above Hazardous Waste Levels Outside the Waste Management Unit. Website: https://calepa.ca.gov/wp-content/uploads/sites/6/2016/10/SiteCleanup-CorteseList-CurrentList.pdf (accessed July 24, 2023).

35 California Environmental Protection Agency (CalEPA). n.d.-a. Cortese List Data Resources. Website: https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5a/ (accessed July 24, 2023).

36 Ibid.

37 City of Anaheim. 2017b. Emergency Operations Plan. Website: https://www.anaheim.net/DocumentCenter/View/21657/City-of-Anaheim-EOP-2017 (accessed July 24, 2023).

any transportation routes that could be used as evacuation routes during emergency events. Adequate emergency access would be provided to and from the project site. Additionally, access to/from the project site must be designed to City standards and would be subject to review by the Anaheim Fire and Rescue and the Anaheim Police Department for compliance with fire and emergency access standards and requirements. Therefore, potential impacts related to emergency response and evacuations plans during operation would be less than significant. No mitigation is required.

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

Less Than Significant Impact. As discussed previously, the project site is located in an urbanized area where wildfire is not considered a likely risk to people or structures. According to the California Department of Forestry and Fire Protection (CAL FIRE),[38] the project site is not located in a fire hazard area. Therefore, impacts related to exposure of people or structures to a significant risk of loss, injury, or death from wildland fires is considered less than significant. No mitigation is required.

[38] California Department of Forestry and Fire Protection (CAL FIRE). 2023. Orange County State Responsibility Area Fire Hazard Severity Zones. Website: https://osfm.fire.ca.gov/media/ovnbsxhd/fhsz_county_sra_11x17_2022_orange_2.pdf (accessed July 24, 2023).

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4.10 HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
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; or	☐	☐	☒	☐
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?	☐	☐	☒	☐

The analysis in this section is based on the *Hydrology Study* (2023) and the *Water Quality Management Plan* (2024) prepared by Coory Engineering for the proposed project. These reports are provided in Appendices D and E.

4.10.1 Impact Analysis

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less Than Significant Impact. The proposed project involves the demolition of an existing 3,279 sq ft one-story self-storage building and 57 RV/boat/vehicle storage parking spaces and the construction of a 52,661 sq ft two-story self-storage facility. Pollutants of concerns during construction include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. During construction activities, excavated soil would be exposed, and there would be an increased potential for soil erosion and transport of sediment downstream compared to existing conditions. During a storm event, soil erosion could occur at an accelerated rate. In addition, construction-related pollutants such as chemicals, liquid and petroleum products (e.g., paints, solvents, and fuels), and concrete-related waste could be spilled, leaked, or transported via stormwater runoff into nearby

drainages and into downstream receiving waters. Any of these pollutants has the potential to be transported via stormwater runoff into receiving waters (i.e., the Pacific Ocean).

The total on-site improvement area is 1.136 acres. It is therefore expected that construction would disturb greater than 1 acre of soil. Therefore, because construction of the proposed project would disturb greater than 1 acre of soil, Regulatory Compliance Measure RCM-WQ-1 is applicable and would require the project to adhere to the requirements of the State Water Quality Control Board's (SWRCB) National Pollutant Discharge Elimination System (NPDES) permit *Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction and Land Disturbance Activities* (Order WQ 2022-0057-DWQ NPDES No. CAS000002) (Construction General Permit). The Construction General Permit (CGP) requires the preparation of a Stormwater Pollution Prevention Plan (SWPPP) and implementation of best management practices (BMPs) during construction activities. Construction BMPs would include, but not be limited to, Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on site and Good Housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters. In addition, as specified in Regulatory Compliance Measure RCM-WQ-2, the proposed project must comply with the City's Municipal Code (Title 10 Section 10.09.070 Interagency Coordination) which requires compliance with the DAMP (Drainage Area Management Plan).[39] Compliance with the DAMP requires compliance with the CGP and the preparation of a SWPPP to implement BMPs that can significantly control pollution from construction sites. As required by RCM-WQ-1 and RCM-WQ-2, prior to approval of a grading or building permit, the proposed project would be required to obtain coverage under the CGP, including preparation of a SWPPP, which will specify construction BMPs to be implemented during construction to target pollutants of concern. Therefore, implementation of RCM-WQ-1 and RCM-WQ-2 would ensure construction impacts related to surface water quality standards and waste discharge requirements would be less than significant. No mitigation is required.

According to the *Geotechnical Site Evaluation and Storm Water Infiltration Test Report* (Appendix C)[40] prepared for the project, groundwater was not encountered during exploratory borings at depths at 41 feet (ft) below ground surface (bgs). Groundwater has historically been encountered at 50 ft bgs at the site. Excavation associated with the proposed project is anticipated to reach a maximum depth of 13 ft bgs. Therefore, groundwater dewatering is not anticipated to be required during construction. As a result, impacts to water quality would be less than significant. No mitigation is required.

Pollutants of concern from long-term operations include pathogens (bacteria/viruses), metals, nutrients, toxic organic compounds, pesticides/herbicides, sediments/total suspended solids, trash and debris, and oil and grease. [41] The proposed project involves removing a one-story self-storage

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[39] The Drainage Area Management Plan is a cooperative project of the County of Orange, the cities of Orange County and the Orange County Flood Control District. It is a policy, programmatic guidance, and planning document for the Orange County Stormwater Program for the management and protection of Orange County's streams, rivers, creeks, and coastal waters. (County of Orange. 2007. Orange County Drainage Area Management Plan. Website: https://ocerws.ocpublicworks.com/service-areas/oc-environmental-resources/oc-watersheds/documents/drainage-area-management-plan-7 [accessed August 9, 2023]).

[40] Gorian & Associates, Inc. 2023. *Geotechnical Site Evaluation and Storm Water Infiltration Test Report*. June.

[41] Ibid.

facility and parking spaces and constructing a two-story self-storage facility. The proposed project would not increase the amount of impervious surface area on site over existing conditions.

As specified in Regulatory Compliance Measure RCM-WQ-3, the project would comply with the requirements of the California Regional Water Quality Control Board, Santa Ana Region, *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* (Orange County MS4 Permit), Order No. R8-2009-0030, NPDES No. CAS618030, as amended by Order No. R8-2010-0062. The Orange County Flood Control District, the County of Orange, and incorporated cities, including the City of Anaheim, are subject to the Orange County MS4 permit. The Orange County MS4 permit requires that a Water Quality Management Plan (WQMP) be prepared for priority new development and redevelopment projects. The proposed project is considered a priority redevelopment project because it replaces more than 5,000 sq ft of impervious surface on an already developed site.

WQMPs specify the Site Design, Source Control, Low Impact Development (LID), and Treatment Control BMPs that would be implemented to capture, treat, and reduce pollutants of concern in stormwater runoff. Site Design BMPs are stormwater management strategies that emphasize conservation and use of existing site features to reduce the amount of runoff and pollutant loading generated from a project site. Source Control BMPs are preventative measures that are implemented to prevent the introduction of pollutants into stormwater. LID BMPs mimic a project site's natural hydrology by using design measures that capture, filter, store, evaporate, detain, and infiltrate runoff rather than allowing runoff to flow directly to piped or impervious storm drains. Treatment Control BMPs are structural BMPs designed to treat and reduce pollutants in stormwater runoff prior to releasing it to receiving waters.

In compliance with the Orange County MS4 Permit, Coory Engineering prepared a Preliminary WQMP (Appendix E), which provides details regarding the proposed project's stormwater management program, including proposed BMPs to reduce or eliminate pollutants of concerns in stormwater runoff and on-site water infiltration basins. According to the Preliminary WQMP, stormwater runoff from the site currently flows towards Humor Drive across the drive aisle towards the driveway, to the curb and gutter along Humor Drive and to a public catch basin about 100 ft north of the Katella Avenue and Humor Drive intersection. Post development drainage conditions will mimic existing drainage conditions by conveying surface runoff to an area drain and runoff will undergo pretreatment through a media filter before being captured by an underground infiltration gallery with a catch basin filter insert. During heavy storm events, surface runoff will pass by the underground infiltration galleries and through a parkway drain at the west side of the project site. According to the Preliminary WQMP, the proposed project will include the following site design principles, structural and non-structural controls, and stormwater quality control measures to reduce and/or eliminate pollution from entering the storm drain system:

- Underground infiltration galleries with catch basin inserts;
- Education for property owners, tenants, and occupants;
- Activity restrictions;

- Common area landscape management;
- BMP maintenance;
- Local Industrial Permit compliance;
- Spill Contingency Plan;
- Underground Storage Tank compliance;
- Hazardous Materials Disclosure compliance;
- California Fire Code implementation;
- Common area litter control;
- Employee training;
- Common area catch basin inspection;
- Street sweeping for private streets and parking lots;
- Retail gasoline outlets;
- Provide storm drain system stenciling and signage;
- Design and construct trash and waste storage areas to reduce pollution introduction; and
- Use efficient irrigation systems and landscape design, water conservation, smart controllers, and source control.

As discussed above and specified in Regulatory Compliance Measure RCM-WQ-3, the proposed project would comply with the Orange County MS4 Permit which requires the preparation of a Final WQMP and implementation of operational BMPs to target and reduce pollutants of concern in stormwater runoff from the project site. Compliance with the Orange County MS4 Permit would reduce operational impacts related to surface water quality standards, waste discharge requirements, and/or degradation of water quality to a less than significant level, and no mitigation is required.

Infiltration of stormwater has the potential to affect groundwater quality in areas of shallow groundwater. As discussed above, groundwater historically occurs at depths of 50 ft bgs. According to the Preliminary WQMP, the majority of on-site soils are in Soil Group B and characterized by a fair to moderate infiltration rate. Under current conditions, 100 percent of the project site is impervious surface area. The proposed project would not increase the amount of impervious surface area compared to existing conditions. Increasing the total impervious surface area decreases the ability for stormwater to infiltrate into the groundwater. The proposed project would implement BMPs to capture and treat stormwater from impervious surfaces, direct it to an infiltration basin where it would be treated before percolating into the soil and thereby prevent potentially contaminated stormwater runoff from reaching groundwater. Any stormwater that exceeds the capacity of the infiltration basins would be conveyed to the public storm drain system via curbs, gutters and catch basins and would not infiltrate the soil. Therefore, untreated overflow stormwater would not infiltrate onsite and would be conveyed to the City storm drain system. Therefore, implementation of the proposed project would not violate groundwater quality standards, waste discharge requirements,

and/or degradation of groundwater quality, impacts would be less than significant, and no mitigation would be required.

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. According to the *Geotechnical Site Evaluation and Storm Water Infiltration Test Report* (Appendix C)[42] prepared for the project, groundwater was not encountered during exploratory borings at depths of 41 ft bgs. Excavation associated with the proposed project is anticipated to reach a maximum depth of 13 ft bgs. Although not anticipated, if dewatering is required it would be conducted in accordance with the requirements of the Groundwater Discharge Permit, Order No. R8-2020-0006, NPDES No. CAG998001. Because dewatering is not required, the proposed project would not interfere with the sustainable management of the groundwater basin. Therefore, construction impacts related to depletion of groundwater supplies or interference with groundwater recharge would be less than significant, and no mitigation would be required.

In its existing condition, the project site includes two self-storage buildings and a parking lot. According to the Preliminary WQMP, development of the project would not increase impervious surface area on the project site. Impervious surfaces preclude groundwater infiltration and thereby interfere with groundwater recharge. However, the proposed project includes infiltration basins that would treat runoff from impervious surface areas and allow it to infiltrate back into the soil, which would allow for continued groundwater recharge. Therefore, the proposed project would not substantially interfere with groundwater recharge. Project operations would not require groundwater extraction. For these reasons, impacts related to depletion of groundwater supplies or interference with groundwater recharge in a manner that may impede sustainable groundwater management would be less than significant, and no mitigation would be required.

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

i. Result in substantial erosion or siltation on- or off-site;

Less Than Significant Impact. During construction activities, soil would be exposed and drainage patterns would be temporarily altered during grading and other construction activities, and there would be an increased potential for soil erosion and siltation compared to existing conditions. Additionally, during a storm event, soil erosion and siltation could occur at an accelerated rate. As discussed above under Response 4.10(a), the Construction General Permit requires the preparation of a SWPPP to identify construction BMPs to be implemented as part of the proposed project to reduce impacts on water quality during construction, including those impacts associated with soil erosion and siltation. As specified in RCM-WQ-1 and RCM-WQ-2, the proposed project would comply with the requirements of the Construction General Permit and the City of Anaheim Municipal Code. With compliance with the requirements in the Construction General Permit and implementation of

[42] Gorian & Associates, Inc. 2023. *Geotechnical Site Evaluation and Storm Water Infiltration Test Report*. June.

the construction BMPs as specified in RCM-WQ-1 and RCM-WQ-2, construction impacts related to on- or off-site erosion or siltation would be less than significant, and no mitigation is required.

In the proposed condition, similar to the existing condition, 84,071 sq ft (100 percent) of the project site would be impervious surface area and not prone to on-site erosion or siltation because no soil would be included in these areas. Therefore, the project is not required to implement hydromodification performance measures. Additionally, as specified in RCM-WQ-3, in compliance with the Orange County MS4 Permit requirements and the Orange County DAMP, infiltration basins would remove debris and sediment prior to stormwater runoff entering the project's storm drain system. Therefore, operation impacts related to substantial on- or off-site erosion or siltation would be less than significant, and no mitigation is required.

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

Less Than Significant Impact. As discussed under Response 4.10(a), project construction would comply with the requirements of the Construction General Permit and would include the preparation and implementation of a SWPPP. The SWPPP would include construction BMPs to control and direct on-site surface runoff to ensure that stormwater runoff from the construction site does not exceed the capacity of the stormwater drainage systems. With implementation of BMPs, construction impacts related to a substantial increase in the rate or amount of surface runoff that would result in flooding would be less than significant, and no mitigation is required.

In the existing condition, none of the project site is pervious surface area. Stormwater runoff sheet flows towards Humor Drive across drive aisle towards the driveway, to the curb and gutter along Humor Drive and to a public catch basin about 100 feet north of the Katella Avenue and Humor Drive intersection.

The proposed project would not increase the amount of impervious surface. The proposed stormwater drainage plan would divide the project site into two drainage areas. Drainage Management Area (DMA)-A would collect stormwater from the southern portion of the project site, approximately 1.18 acres, and DMA-B would collect stormwater from the northern portion of the project site, approximately 0.75 acre. Stormwater runoff from DMA-A would flow to catch basins along the drive aisle south of the proposed new facility and conveyed to the southern infiltration basins. Runoff from DMA-B would drain to proposed catch basins along the drive aisle and parking lot to the north of the proposed new facility and conveyed to the northern infiltration basins. Overflow would be conveyed past the infiltration basins through a proposed parkway drain under the sidewalk. The proposed project would not change flows in DMA-A or DMA-B for 25-year and 100-year storm events and would decrease flows (in DMA-A and DMA-B combined) by 0.001 cubic feet per second (cfs) in the 10-year storm event.

Because the proposed drainage systems and stormwater BMPs would be sized to collect and convey stormwater runoff on the project site, proposed project impacts related to on- or off-site flooding from an increase in surface runoff would be less than significant, and no mitigation is required.

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

Less Than Significant Impact. As discussed under Response 4.10(a), pollutants of concern during construction include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. Drainage patterns would be temporarily altered during grading and other construction activities, and construction-related pollutants could be spilled, leaked, or transported via storm runoff into adjacent drainages and downstream receiving waters. However, as specified in RCM-WQ-1, the proposed project would be required to comply with the requirements set forth by the Construction General Permit and SWPPP, which would specify BMPs to be implemented to control the discharge of pollutants in stormwater runoff as a result of construction activities. Additionally, as discussed under Response 4.10(c)(ii), the SWPPP would include construction BMPs to control and direct surface runoff on site to ensure that stormwater runoff from the construction site does not exceed the capacity of the stormwater drainage systems.

For these reasons, with implementation of RCM-WQ-1 and RCM-WQ-3, construction impacts related to creation or contribution of runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff would be less than significant, and no mitigation is required. The operation of the proposed project has the potential to introduce pollutants to the storm drain system from the proposed on-site uses. As discussed under Response 4.10(a), expected pollutants of concern from long-term operations include pathogens (bacteria/viruses), metals, nutrients, toxic organic compounds, pesticides/herbicides, sediments/total suspended solids, trash and debris, and oil and grease. As required by RCM-WQ-2 and RCM-WQ-3, the WQMP would require the implementation of operational BMPs to reduce pollutants of concern in stormwater runoff. With implementation of operational BMPs, no substantial additional sources of polluted runoff would be discharged to the storm drain system.

Development of the proposed project would not increase impervious surface area on the project site. The proposed project would install new storm drains, catch basins, and utilize on-site infiltration. As discussed in the Preliminary WQMP, on-site drainage facilities would be adequately sized to convey and reduce runoff, such that on-site and off-site drainage facility capacity would not be exceeded during a design storm. Therefore, the proposed project would not result in an exceedance of planned or existing stormwater drainage systems.

For the reasons discussed above, with adherence to Regulatory Compliance Measures RCM-WQ-2 and RCM-WQ-3, operational project impacts associated with the introduction of substantial sources of polluted runoff or additional runoff would be less than significant and would not result in an exceedance in capacity of existing or planned stormwater drainage systems. No mitigation is required.

iv. Impede or redirect flood flows?

Less Than Significant Impact. The project site is not located within a Federal Emergency Management Agency (FEMA) designated 100-year floodplain. According to the FEMA Flood Insurance Rate Map

(FIRM) No. 06059C0137J, the project site is located within Zone X.[43] Zone X is designated as an area determined to be outside the 500-year floodplain. As the proposed project would not place improvements and structures directly within a 100-year floodplain, the proposed project would not impede or redirect flood flows. Therefore, impacts related to impeding or redirecting of flood flows would be less than significant, and no mitigation would be required.

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

No Impact. Tsunamis are ocean waves generated by tectonic displacement of the seafloor associated with shallow earthquakes, seafloor landslides, rock falls, and exploding volcanic islands. Tsunamis can have wavelengths of up to 120 miles and travel as fast as 500 miles per hour across hundreds of miles of deep ocean. Upon reaching shallow coastal waters, the waves can reach up to 50 ft in height, causing great devastation to near-shore structures. The project site is located approximately 7.25 miles from the Pacific Ocean shoreline. According to the Department of Conservation Orange County Tsunami Hazard Areas Map,[44] the project site is located outside of the tsunami hazard area. Therefore, the project site would not be not subject to inundation from tsunamis, and there would be no risk of release of pollutants due to inundation from tsunami.

Seiching occurs when seismic ground shaking induces standing waves (seiches) inside water retention facilities (e.g., reservoirs and lakes). Such waves can cause retention structures to fail and flood downstream properties. The closest water retention facility to the project site is the West Street Basin located approximately 1.59 miles southeast of the project site. This water retention facility is quite small and distant from the project site and therefore does not cause a risk of inundation from seiche. Therefore, the project site would not be subject to inundation from seiche waves, and there would be no risk of release of pollutants due to inundation from seiche.

As discussed under Response 4.10(c)(iv), the project site is located within Zone X (designated as an area determined to be outside the 500-year floodplain). The project would not change existing land uses on the project site compared to existing conditions. As discussed under Response 4.10(a), BMPs would be implemented to target and reduce pollutants of concern on the project site. In addition, as previously discussed in Section 4.9, Hazards and Hazardous Materials, hazardous substances associated with commercial uses would be limited in both amount and use. The materials used on site would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. There are no levees within the vicinity of the project site and as discussed above there are no water bodies within the vicinity of the project site that would pose a risk of flooding. Furthermore, because BMPs would reduce the introduction of pollutants on the site and any hazardous materials used on site would be properly stored and contained, there would be a low potential for pollutants to be released from the project site in the unlikely event of inundation of the project site. Therefore, there would be no impacts related to release of pollutants in the event of inundation from flooding. No mitigation is required.

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43 Coory Engineering. 2023. Hydrology Study, Attachment A. June.

44 California Department of Conservation (DOC). 2021. Orange County Tsunami Hazard Areas. Website: https://www.conservation.ca.gov/cgs/tsunami/maps/orange (accessed August 4, 2023).

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

Less Than Significant Impact. The project is within the jurisdiction of the Santa Ana Regional Water Quality Control Board (RWQCB). The Santa Ana RWQCB adopted a Water Quality Control Plan (i.e., Basin Plan) (1995, last updated June 2019) that designates beneficial uses for all surface and groundwater within its jurisdiction and establishes the water quality objectives and standards necessary to protect those beneficial uses. As summarized below, the project would comply with the applicable NPDES permits and would implement construction and operational BMPs to reduce pollutants of concern in stormwater runoff.

As discussed under Response 4.10(a), during construction activities, excavated soil would be exposed, and there would be an increased potential for soil erosion and sedimentation compared to existing conditions. In addition, chemicals, liquid products, petroleum products (e.g., paints, solvents, and fuels), and concrete-related waste may be spilled or leaked and have the potential to be transported via stormwater runoff into receiving waters. As specified in Regulatory Compliance Measure RCM-WQ-1, the proposed project would be required to comply with the requirements set forth by the Construction General Permit, which requires the preparation of a SWPPP and implementation of construction BMPs to control stormwater runoff and discharge of pollutants.

As discussed under Response 4.10(a), the primary pollutants of concern during project operations are pathogens (bacteria/viruses), metals, nutrients, toxic organic compounds, pesticides/herbicides, sediments/total suspended solids, trash and debris, and oil and grease. As stated under Response 4.10(a), a final WQMP would be prepared for the project in compliance with the Orange County MS4 Permit and the DAMP. The Final WQMP would detail the Site Design, Source Control, and/or Treatment Control BMPs that would be implemented to treat stormwater runoff and reduce impacts to water quality during operation. The proposed BMPs would capture and treat stormwater runoff and reduce pollutants of concern in stormwater runoff.

The proposed project would comply with the applicable NPDES permits, which require the preparation of a SWPPP, preparation of a Final WQMP, and implementation of construction and operational BMPs to reduce pollutants of concern in stormwater runoff. As such, the project would not result in water quality impacts that would conflict with Santa Ana RWQCB's Water Quality Control Plan (Basin Plan). Impacts related to conflict with a water quality control plan would be less than significant, and no mitigation is required.

The Sustainable Groundwater Management Act (SGMA) was enacted in September 2014. SGMA requires governments and water agencies of high- and medium-priority basins to halt overdraft of groundwater basins. SGMA requires the formation of local Groundwater Sustainability Agencies (GSAs), which are required to adopt Groundwater Sustainability Plans to manage the sustainability of the groundwater basins. The project site is located within the Coastal Plain of Orange County Groundwater Basin, which is managed by the Orange County Water District (OCWD).[45] The Coastal Plain of Orange County Groundwater Basin is identified by the Department of Water Resources as a

[45] California Department of Water Resources (DWR). 2018. Groundwater Basin Boundary Assessment Tool. Website: https://gis.water.ca.gov/app/bbat/ (accessed August 4, 2023).

medium priority basin; therefore, development of a Groundwater Sustainability Plan is required. In compliance with this requirement, OCWD prepared and submitted the *Basin 8-1 Alternative – OCWD Management Area*[46] to the California DWR as an alternative to a Groundwater Sustainability Plan (California DWR 2019). The *Basin 8-1 Alternative – OCWD Management Area* demonstrates that the groundwater basin has been sustainably managed over the last 11 years and will continue to be sustainably managed. As discussed under Responses 4.10(a) and 4.10(b), the proposed project does not have the potential to impact groundwater quality, interfere with groundwater recharge, or decrease groundwater supplies. No groundwater extraction or dewatering is expected during construction and therefore the proposed project would not interfere with the sustainable management of the groundwater basin. Additionally, project operations would not require groundwater extraction. For these reasons, the proposed project would not conflict with or obstruct the implementation of a sustainable groundwater management plan. Therefore, no impact would occur related to conflict with or obstruction of water quality control plans or sustainable groundwater management plans, and no mitigation is required.

4.10.2 Standard Conditions and Regulatory Compliance Measures

Regulatory Compliance Measure RCM-WQ-1

Construction General Permit. Prior to issuance of a grading permit, the Applicant, or designee, shall obtain coverage under the *State Water Resources Control Board National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities* (Order WQ 2022-0057-DWQ NPDES No. CAS000002) (Construction General Permit). This shall include the submission of Permit Registration Documents (PRDs), including a Notice of Intent (NOI) for coverage under the permit to the State Water Resources Control Board (SWRCB) via the Stormwater Multiple Application and Report Tracking System (SMARTS). The Applicant shall provide the Waste Discharge Identification Number (WDID) to the City of Anaheim (City) to demonstrate proof of coverage under the Construction General Permit. A Stormwater Pollution Prevention Plan (SWPPP) shall be prepared and implemented for the proposed project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify construction best management practices (BMPs) to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the

[46] Orange County Water District (OCWD). 2017. *Basin 8-1 Alternative – OCWD Management Area.* Website: https://www.mwdoc.com/wp-content/uploads/2021/04/Appendix-D-2017-Basin-8-1-Alternative.pdf (accessed August 3, 2023).

discharge of pollutants in stormwater runoff as a result of construction activities (e.g., dust control, fiber rolls, and storm drain inlet protection). Construction Site BMPs shall also conform to the requirements specified in the latest edition of the Orange County Stormwater Program *Construction Runoff Guidance Manual for Contractors, Project Owners, and Developers* to control and minimize the impacts of construction and construction-related activities, materials, and pollutants on the watershed. Upon completion of construction and stabilization of the site, a Notice of Termination will be submitted via SMARTs.

Regulatory Compliance Measure RCM-WQ-2

City of Anaheim Municipal Code. Prior to issuance of grading or building permits, the Applicant, or designee, shall submit final project plans to the City for review and approval, which address compliance with the water quality requirements of Title 10 Section 10.09.070, Interagency Cooperation, of the City of Anaheim Municipal Code. The Federal Clean Water Act authorizes the National Pollutant Discharge Elimination System (NPDES) Permit for the Orange County area and provides for cooperative implementation of requirements and interagency allocations of program resources and burdens. The coordinated effort of the County and the Co-Permittees is reflected in the NPDES Permit Implementation Agreement Santa Ana/San Diego Regions, the NPDES Permits, the Drainage Area Management Plan (DAMP), the ordinance codified in this chapter, the appendices to the DAMP, including, but not limited to, the development project guidance, monitoring and data collection cooperation, and regular emergency and spill response planning activities.

Regulatory Compliance Measure RCM-WQ-3

Orange County MS4 Permit. Prior to issuance of grading or building permits or prior to recordation upon subdivision of land, the Applicant, or designee, shall submit a Final Water Quality Management Plan (WQMP) to the City of Anaheim, for review and approval, in compliance with the *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 Orange County, (Orange County MS4 Permit) Order No. R8-2009-0030, NPDES No. CAS618030, as amended by Order No. R8-2010-0062. The Final WQMP shall be prepared consistent with the requirements of the *Model Water Quality Management Plan (WQMP)*,[47] *Technical Guidance Document for the Preparation of Conceptual/Preliminary and/or Project Water Quality Management Plans (WQMPs)*[48] or subsequent guidance manuals. The Final WQMP shall specify the BMPs to be incorporated into the project design to target pollutants of concern in runoff from the project site. The City Engineer, or designee, shall ensure that the BMPs specified in the Final WQMP are incorporated into the final project design.

[47] County of Orange. 2011. Model Water Quality Management. Website: https://ocerws.ocpublicworks.com/service-areas/oc-environmental-resources/oc-watersheds/regional-stormwater-program/water-quality (accessed August 3, 20230).

[48] County of Orange. 2013b. Technical Guidance Document for the Preparation of Conceptual/Preliminary and/or Project Water Quality Management Plans. Website: https://ocerws.ocpublicworks.com/service-areas/oc-environmental-resources/oc-watersheds/regional-stormwater-program/water-quality (accessed August 3, 20230).

4.11 LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

4.11.1 Impact Analysis

a. Would the project physically divide an established community?

No Impact. The proposed project consists of Assessor's Parcel Number (APN) 128-542-11 and is approximately 1.93 acres.[49] The project site is primarily surrounded by a mixture of residential, commercial, and industrial uses. The proposed project consists of the demolition of the existing 3,279 sq ft one-story self-storage building and 57 RV/boat/vehicle storage parking spaces and the construction of a 52,661 sq ft two-story self-storage facility. The proposed project would be a relatively small infill development that would not add any new roadways or structures that would divide or disrupt neighborhoods or communities, and it would not physically divide an established community. No impacts would occur. No mitigation is required.

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. The proposed project includes the demolition of the existing 3,279 sq ft one-story self-storage building and 57 RV/boat/vehicle storage parking spaces and the construction of a 52,661 sq ft two-story self-storage facility. The proposed project area has a General Plan land use designation of low medium density residential. General Plan land use designations surrounding the project site include low density residential and medium density residential.[50]

According to the City's Zoning map, the project site is currently zoned for General Commercial (C-G). Per Anaheim Municipal Code Section 18.08.030, with approval of a Conditional Use Permit (CUP) operation of self-storage facilities is permitted on parcels zoned C-G. Additionally, an increase in the maximum Floor Area Ratio (FAR) is permitted subject to the approval of a CUP. Per Anaheim Municipal Code Section 18.08.045,[51] maximum FAR for the C-G zone is 0.50 and the proposed FAR on the project

[49] City of Anaheim. n.d. Property Info. Website: https://www.anaheim.net/1002/Property-Info (accessed August 4, 2023).
[50] Ibid.
[51] City of Anaheim. 2006. Anaheim Municipal Code. Website: https://codelibrary.amlegal.com/codes/anaheim/latest/anaheim_ca/0-0-0-51668 (accessed August 7, 2023).

site is 1.33. City of Anaheim Council Policy 7.2,[52] adopted in 1998, allows for self-storage facilities as a conditionally permitted use in certain commercial and industrial zones "on irregularly-shaped properties which may be further constrained by accessibility or visibility and which may not be suitable for conventional types of development." However, the existing self-storage CUP was approved in 1995 prior to adoption of City of Anaheim Council Policy 7.2, which is therefore not applicable to the proposed project. Pursuant to Anaheim Municipal Code Section 18.60.160, the self-storage facility use has been established on the project site and there are no provisions in the Anaheim Municipal Code to preclude the expansion of the use in accordance with the development standards and regulations for the operation of the use in the C-G zone. With approval of the CUPs, the proposed project would be consistent with the City zoning code and the C-G zoning designation.

The proposed project would not conflict with any applicable land use plans, policies, or regulations that have been adopted for the purpose of avoiding or mitigating environmental effects. As indicated in Section 4.8, the proposed project would comply with existing State regulations adopted to achieve the overall GHG emissions reduction goals identified in Assembly Bill (AB) 32, the AB 32 Scoping Plan, Executive Order (EO) B-30-15, Senate Bill (SB) 32, and AB 197. The project would also be consistent with the Southern California Association of Governments' (SCAG) Connect SoCal 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Further, the proposed project would be consistent with City policies related to construction hours specified in the Noise Ordinance in the City of Anaheim's Municipal Code Section 6.70.010 and Goal 3.1 and its associated policies of the City's General Plan Noise Element[53] related to minimizing the noise impacts on residents from "spill over" noise stemming from the City's activity centers. The proposed project would also be consistent with City policies specified in the General Plan Circulation Element[54] including Goal 12.1 related to ensuring adequate parking is made available to residents, visitors, and businesses. Impacts related to conflicts with land use plans or policies are considered less than significant, and no mitigation is required.

[52] City of Anaheim. 2022b. Council Policy Manual. Website https://www.anaheim.net/DocumentCenter/View/4453/Council-Policies-Manual (accessed October 20, 2023).

[53] City of Anaheim. 2004e. General Plan Noise Element. Website: https://www.anaheim.net/DocumentCenter/View/2037/J-Noise-Element-?bidId= (accessed August 9, 2023).

[54] City of Anaheim. 2004a. General Plan Circulation Element. Website: https://www.anaheim.net/DocumentCenter/View/9520/D-0-Circulation-Element?bidId= (accessed July 31, 2023).

4.12 MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

4.12.1 Impact Analysis

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?

No Impact. In 1975, the California Legislature enacted the Surface Mining and Reclamation Act (SMARA), which, among other things, provided guidelines for the classification and designation of mineral lands. Areas are classified on the basis of geologic factors without regard to existing land use and land ownership. The areas are categorized into four Mineral Resource Zones (MRZs):

- **MRZ-1:** An area where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- **MRZ-2:** An area where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence.
- **MRZ-3:** An area containing mineral deposits, the significance of which cannot be evaluated.
- **MRZ-4:** An area where available information is inadequate for assignment to any other MRZ.

Of the four categories, lands classified as MRZ-2 are of the greatest importance. Such areas are underlain by demonstrated mineral resources or are located where geologic data indicate that significant measured or indicated resources are present. MRZ-2 areas are designated by the Mining and Geology Board as being "regionally significant" (California Surface Mining and Reclamation Policies and Procedures 2000). Such designations require that a Lead Agency's land use decisions involving designated areas be made in accordance with its mineral resource management policies and that it consider the importance of the mineral resource to the region or the State as a whole, not just to the Lead Agency's jurisdiction.

No known mineral resources exist within the City of Anaheim.[55] The proposed project would not result in the loss of a known commercially valuable or locally important mineral resource. No impacts to

[55] City of Anaheim. 2004b. General Plan EIR Section 5.9 Mineral Resources. Website: https://www.anaheim.net/932/EIR-No-330-Volume-I-FEIR (accessed July 24, 2023).

known mineral resources would occur as a result of the proposed project, and therefore, no mitigation would be required.

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

No Impact. As stated in Response 4.12(a), there are no known mineral resources within the City of Anaheim. The project site is currently developed with structures and parking facilities. No mineral extraction activities occur on the project site, and it is not located within an area known to contain locally important mineral resources. Therefore, the project would not result in the loss of availability of a locally important mineral resource recovery site as delineated on a local general plan, specific plan, or other land use plan as a result of project implementation. No mitigation would be required.

4.13 NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 2 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?	☐	☐	☐	☒

The impact analysis below is based on the results of the *Noise and Vibration Impact Analysis Memorandum* (2023b), prepared by LSA Associates, Inc. for the proposed project, and included as Appendix G.

4.13.1 Impact Analysis

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

Less Than Significant Impact. The proposed project would result in short-term construction noise impacts on adjacent land uses and long-term noise impacts related to mobile sources.

Short-Term Construction Noise Impacts

Construction noise impacts would be short-term, generally intermittent depending on the construction phase, and variable depending on receiver distance from the active construction zone. The duration of impacts generally would be from 1 day to several weeks depending on the phase of construction. Two types of short-term noise impacts would occur during project construction: (1) equipment delivery and construction worker commutes, and (2) project construction operations. The first type of short-term construction noise would result from transport of construction equipment and materials to the project site and construction worker commutes. These transportation activities would incrementally raise noise levels on access roads leading to the site. It is expected that larger trucks used in equipment delivery would generate higher noise impacts than trucks associated with worker commutes. The single-event noise from equipment trucks passing at a distance of 50 feet (ft) from a sensitive noise receptor would reach a maximum level of 84 A-weighted decibel maximum instantaneous sound level (dBA L_{max}). However, the pieces of heavy equipment for grading and construction activities would be moved on site one time and would remain on site for the duration of all construction phases. This one-time trip, when heavy construction equipment is moved on and off site, would not add to the daily traffic noise in the project vicinity. The total number of daily vehicle

trips would be minimal when compared to existing traffic volumes on the affected streets, and the long-term noise level changes associated with these trips would not be perceptible. Therefore, equipment transport noise and construction-related worker commute impacts would be short-term and would not result in a significant off-site noise impact. No mitigation is required.

The second type of short-term noise impact is related to noise generated during demolition, site preparation, grading, building construction, paving, and architectural coating on the project site. Construction is undertaken in discrete steps, each of which has its own mix of equipment and its own noise characteristics. These various sequential phases would change the character of the noise generated on the project site. Therefore, the noise levels vary as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase. Table 4.13.A lists the maximum noise levels for typical construction equipment based on a distance of 50 ft between the construction equipment and a noise receptor. Typical operating cycles for these types of construction equipment may involve 1–2 minutes of full power operation followed by 3–4 minutes at lower power settings.

In addition to the referenced maximum noise level, the usage factor provided in Table 4.13.A is used to calculate the hourly noise level impact for each piece of equipment. Each piece of construction equipment is operated as an individual point source. Table 4.13.B shows the composite noise levels of the pieces of equipment for each construction phase at a distance of 50 ft from the construction area.

Table 4.13.A: Typical Construction Equipment Noise Levels

Equipment Description	Acoustical Usage Factor (%)	Maximum Noise Level (L_{max}) at 50 ft
Compressor	100	81
Concrete Mixer	40	85
Concrete Pump	40	85
Crane	16	83
Dozer	40	80
Forklift	20	75
Front [End] Loader	40	79
Generator	100	78
Grader	8	85
Scraper	40	88
Welder	40	74

Sources: *Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances* (USEPA 1971); Roadway Construction Noise Model (FHWA 2006).
ft = foot/feet
L_{max} = maximum instantaneous sound level

Table 4.13.B: Construction Noise Levels by Phase

Phase	Duration (days)	Equipment	Composite Noise Level at 50 ft (dBA L_{eq})	Distance to Sensitive Receptor (ft)[1]	Noise Level at Receptor (dBA L_{eq})
Demolition	10	1 concrete/industrial saw, 1 dozer, and 3 tractors	86	110	79
Site Preparation	15	1 grader, 1 dozer, and 1 tractor	85	110	78
Grading	10	1 grader, 1 dozer, and 2 tractors	85	110	78
Building Construction	230	1 crane, 1 forklift, 1 generator set, 1 tractor, and 3 welders	83	110	76
Paving	10	1 cement and mortar mixer, 1 paver, 1 paving equipment, 1 roller, and 1 tractor	85	110	79
Architectural Coating	115	1 air compressor	74	110	67

Source: Compiled by LSA (2023).
[1] Distances are from the average location of construction activity for each phase, assumed to be the center of the project site. Residential uses to the north are 30 feet from the edge of construction activity.
dBA L_{eq} = average A-weighted hourly noise level
ft = foot/feet

As presented above, Table 4.13.B shows the construction phases, the expected duration of each phase, the equipment expected to be used during each phase, the composite noise levels of the equipment at 50 ft, the distance of the nearest residential building, the multi-family building to the north, from the average location of construction activities (a distance of 110 ft from the center of the project site), and noise levels expected during each phase of construction. These noise level projections do not take into account intervening topography or barriers. It is expected that average noise levels during construction at the nearest sensitive receptor, the multifamily residential uses to the north, would approach 79 dBA L_{eq} during the demolition and paving phases, which would occur for a duration of approximately 10 days. Average noise levels during other construction phases would range from 67 dBA L_{eq} to 78 dBA L_{eq}. It should be noted that construction noise levels at the single-family uses to the east would be lower than those in Table 4.13.B as the distance from the center of construction activities is approximately 140 ft.

Noise levels at the nearest off-site commercial uses (existing office building) to the southeast would reach an average noise level of 73 dBA L_{eq} during the daytime hours. The elevated noise levels would cease once project construction is completed. Furthermore, the construction-related noise levels would be below the 80 dBA L_{eq} and 85 dBA L_{eq} criteria established by the Federal Transit Administration (FTA) for residential and commercial uses, respectively. The proposed project would be required to comply with the construction hours specified in the City of Anaheim's Noise Ordinance which states that construction activities shall only occur between the hours of 7:00 a.m. and 7:00 p.m. Additionally, Goal 3.1 of the City's General Plan Noise Element requires the proposed project to follow policies protecting residents from "spill over" noise stemming from the City's activity centers. With adherence to the City's Noise Ordinance, as summarized in Regulatory Compliance Measure RCM-NOI-1, below, and the City's General Plan Noise Element Goal 3.1, as summarized in Regulatory Compliance Measure RCM-NOI-2, noise levels during construction would be reduced to the greatest extent feasible. While construction operations have the potential to generate audible noise at surrounding uses, construction noise levels generated during the permitted hours are exempt from

compliance with City noise standards, would be temporary and mobile, and would be less than significant. No mitigation is required.

Long-Term Off-Site Traffic and Operational Noise and Ground-Borne Noise from Vehicular Traffic Impacts

The proposed project is estimated to generate an average daily traffic (ADT) volume of 44 based on the proposed increase in square footage of the self-storage building. Based on the City of Anaheim (*Daily Traffic Counts*), the existing ADT volume on Katella Avenue in the project vicinity is approximately 34,100 based on projections for the year 2007.[56] While the existing volume is likely higher today, the project-related traffic would increase traffic noise along Katella Avenue by less than 0.1 dBA. This noise level increase would not be perceptible to the human ear in an outdoor environment. Therefore, traffic noise impacts from project-related traffic on off-site sensitive receptors would be less than significant, and no mitigation is required.

Potential long-term noise impacts would be associated with stationary sources proposed on the project site. Stationary noise sources from the proposed project would include noise generated from on-site heating, ventilation, and air conditioning (HVAC) noise, truck deliveries and loading and unloading activities. Based on previous measurements that LSA has conducted, the HVAC equipment would generate noise levels of 72 dBA L_{eq} at 5 ft per HVAC unit. Additionally, the proposed project is estimated to have one trash dumpster south of the proposed building. Trash emptying activities would take place for a period less than 1 minute and would generate sound power levels (SPLs) of up to 118.6 dBA SPL or 84 dBA L_{eq} at 50 ft. Noise generated from truck deliveries and loading and unloading activities would be at a level of 75 dBA L_{eq} at 20 ft associated with truck engine noise, air brakes, and backup alarms.

Table 4.13.C, below, shows the combined hourly noise levels generated by HVAC equipment, truck delivery activities, and trash bin emptying activities at the property line of the closest off-site land uses. The project-related noise level impacts would range from 49.3 dBA L_{eq} to 50.8 dBA L_{eq} at the surrounding sensitive receptors. These levels would be well below the City's exterior noise standard of 60 dBA L_{eq}. Because project noise levels would not generate a noise level exceeding the City's thresholds by 3 dBA or more, the impact would be less than significant, and no mitigation measures are required.

Table 4.13.C: Exterior Noise Level Impacts

Receptor	Direction	Existing Quietest Daytime Noise Level (dBA L_{eq})	Project-Generated Noise Levels (dBA L_{eq})	Potential Operational Noise Impact?[1]
Multifamily Residential	North	47.6	50.8	No
Single-family Residential	East	46.9	49.3	No

Source: Compiled by LSA (2023).

[1] A potential operational noise impact would occur if (1) the quietest daytime ambient hour is less than 60 dBA L_{eq} and project noise impacts are greater than 60 dBA L_{eq}, OR (2) the quietest daytime ambient hour is greater than 60 dBA L_{eq} and project noise impacts are 3 dBA greater than the quietest daytime ambient hour.

dBA = A-weighted decibels L_{eq} = equivalent noise level

[56] LSA Associates, Inc. (LSA). 2023b. Noise and Vibration Impact Analysis Memorandum. December.

The proposed project would not generate vibration levels related to on-site operations. In addition, vibration levels generated from project-related traffic on the adjacent roadways are unusual for on-road vehicles because the rubber tires and suspension systems of on-road vehicles provide vibration isolation. Based on a reference vibration level of 0.076 inches per second (in/sec) peak particle velocity (PPV), structures more than 20 ft from the roadways that contain project trips would experience vibration levels below the most conservative standard of 0.12 in/sec PPV; therefore, vibration levels generated from project-related traffic on the adjacent roadways would be less than significant, and no mitigation measures are required.

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant with Mitigation Incorporated. Project construction would result in short-term vibration impacts on adjacent land uses as detailed in the analysis below. Construction impacts would be short-term, generally intermittent depending on the construction phase, and variable depending on receiver distance from the active construction. The duration of impacts generally would be from 1 day to several weeks depending on the phase of construction.

Groundborne noise and vibration from construction activity would be low. Table 4.13.D provides reference PPV values and vibration levels (in terms of vibration velocity in decibels [VdB]) from typical construction vibration sources at 25 ft. While there is currently limited information regarding vibration source levels specific to the equipment that would be used for the project, to provide a comparison of vibration levels expected for a project of this size, a large bulldozer would generate 0.089 PPV (in/sec) of ground-borne vibration when measured at 25 ft, based on the FTA's 2008 *Transit Noise and Vibration Impact Assessment Manual* (FTA Manual). It would take a minimum of 0.2 PPV (in/sec) to cause any potential building damage to non-engineered timber and masonry buildings.

Table 4.13.D: Vibration Source Amplitudes for Construction Equipment

Equipment	Reference PPV/L_V at 25 ft	
	PPV (in/sec)	L_V (VdB)[1]
Hoe Ram	0.089	87
Large Bulldozer	0.089	87
Caisson Drilling	0.089	87
Loaded Trucks	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58

Source: *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018).
[1] RMS VdB re 1 µin/sec.
µin/sec = micro-inches per second
ft = foot/feet
FTA = Federal Transit Administration
in/sec = inches per second
L_V = velocity in decibels
PPV = peak particle velocity
RMS = root-mean-square
VdB = vibration velocity in decibels

The distance to the nearest buildings for vibration impact analysis is measured between the nearest off-site buildings and the project construction boundary (assuming the construction equipment would only be used at or near the project setback line). The formula for vibration transmission is provided below:

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

The closest structures to the external construction activities are the garages associated with the residential uses to the north and the existing Extra Space Storage facility to the south, which are within approximately 5 ft from the project's northern and southern construction boundaries, respectively. Using the reference data from Table 4.13.D and the equation above, it is expected that vibration levels generated by dump trucks and other large equipment within 10 ft of the project boundary would generate ground-borne vibration levels of 0.352 PPV (in/sec) or higher at the closest structures to the project site. This vibration level would exceed the 0.2 in/sec PPV threshold considered safe for non-engineered timber and masonry buildings, which would result in a potentially significant impact. The distance from large construction equipment with a reference vibration level of 0.089 in/sec PPV at 25 ft for which the 0.2 in/sec threshold would no longer be exceeded is 15 ft. Vibration levels at all other buildings would be lower. Therefore, construction would not result in any vibration damage, and impacts would be less than significant with the incorporation of Mitigation Measure NOI-1, which requires measures during construction to ensure that vibration impacts are avoided.

Lastly, long-term ground-borne vibration from vehicular traffic was analyzed for the proposed project. Because the rubber tires and suspension systems of buses and other on-road vehicles provide vibration isolation and reduce noise, it is unusual for on-road vehicles to cause ground-borne noise or vibration. When on-road vehicles cause such effects as the rattling of windows, the source is almost always airborne noise. Most problems with on-road vehicle-related noise and vibration can be directly related to a pothole, bump, expansion joint, or other discontinuity in the road surface. Smoothing the bump or filling the pothole will usually solve the problem. Based on a reference vibration level of 0.076 in/sec PPV, structures more than 20 ft from the roadways that contain project trips would experience vibration levels below the most conservative standard of 0.12 in/sec PPV; therefore, vibration levels generated from project-related traffic on the adjacent roadways would be less than significant, and no mitigation measures are required. Overall, potential impacts related to the generation of excessive ground-borne vibration or ground-borne noise levels would be reduced to less than significant with the incorporation of MM-NOI-1.

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 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The project site is approximately 5 miles southeast of Fullerton Municipal Airport (FUL). The project site is not located within the 65 dBA Community Noise Equivalent Level (CNEL) and 60 dBA CNEL noise contours and there are no helipads or private airstrips within 2 miles from the project area. Therefore, the proposed project would not expose people residing or working in the proposed project vicinity to excessive noise levels from aircraft noise. No noise impacts would occur, and no mitigation is required.

4.13.2 Regulatory Compliance Measures

The following Regulatory Compliance Measures are required to reduce construction noise and vibration impacts to the extent feasible:

Regulatory Compliance Measure RCM-NOI-1 **City of Anaheim Noise Ordinance.** The proposed project shall be required to comply with the construction hours specified in the City of Anaheim's (City) Noise Ordinance, which states that construction activities shall only occur between the hours of 7:00 a.m. and 7:00 p.m.

4.13.3 Mitigation Measures

The following mitigation measure is required to reduce noise and vibration impacts to a less than significant level:

Mitigation Measure MM-NOI-1 **Construction Vibration Damage.** Due to the close proximity to surrounding structures, the City of Anaheim (City) Planning and Building Director, or designee, shall verify, prior to issuance of demolition or grading permits, that the approved plans require that the construction contractor shall implement the following measures during project construction activities to ensure that damage does not occur at surrounding structures:

- Identify structures that are located within 15 feet (ft) of heavy construction activities and that have the potential to be affected by ground-borne vibration. This task shall be conducted by a qualified structural engineer as approved by the City's Planning and Building Director, or designee.
- Once the construction equipment list finalized, a comparison of the proposed equipment to be used and the assumed equipment vibration levels presented in Table 7-4 of the Federal Transit Administration's *Noise and Vibration Impact Assessment Manual – FTA Report No. .0123* (FTA Manual) shall be completed. If it is determined that the proposed equipment would generate lower vibration levels than assumed, further vibration mitigation would not be necessary. However, if levels would potentially exceed the FTA Damage Criteria presented in Table 7-5 of the FTA Manual, the Applicant shall

develop a vibration monitoring and construction contingency plan for approval by the Planning and Building Director, or designee, to identify structures where monitoring would be conducted; set up a vibration monitoring schedule; define structure-specific vibration limits; and address the need to conduct photo, elevation, and crack surveys to document before-and-after construction conditions. Construction contingencies would be identified for when vibration levels approached the limits.

- If a vibration monitoring and construction contingency plan is deemed necessary, vibration monitoring during initial construction activities would be required. Monitoring results may indicate the need for more or less intensive measurements.
- When vibration levels approach limits, suspend construction and implement contingencies, as identified in the approved vibration monitoring and construction contingency plan, to either lower vibration levels or secure the affected structures.

4.14 POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

4.14.1 Impact Analysis

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)?

No Impact.

Construction. Construction of the proposed project would provide short-term construction jobs over an approximately 12-month period. Many of the construction jobs would be temporary and would be specific to the variety of construction activities. The workforce would include a variety of craftspeople, such as cement finishers, ironworkers, welders, carpenters, electricians, painters, and laborers. Generally, construction workers are only at a job site for the timeframe in which their specific skills are needed to complete that phase of construction. Although the proposed project would increase the number of employees at the project site during construction activities, it is expected that local and regional construction workers would be available to serve the proposed project's construction needs.

Project-related construction workers would not be expected to relocate their household's place of residence as a consequence of working on the proposed project; therefore, the proposed project would not result in impacts associated with inducing substantial population growth or demand for housing through increased construction employment, and no mitigation would be required.

Operation. The proposed project would not cause or result in direct population growth because the proposed project would not provide or remove housing on the project site. No additional staff are required to operate the project. Operation of the proposed project would not induce substantial population growth or accelerate development in an underdeveloped area, and there would be no impacts to population growth. No mitigation is required.

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

No Impact. As previously stated, the project proposes the construction of a new self-storage building to replace the current smaller self-storage building. Therefore, the project would not result in a loss of housing or displace any persons living on the project site, nor require or necessitate the development of replacement housing elsewhere. No impacts would occur, and no mitigation would be required.

4.15 PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire protection?	☐	☐	☒	☐
ii. Police protection?	☐	☐	☒	☐
iii. Schools?	☐	☐	☐	☒
iv. Parks?	☐	☐	☐	☒
v. Other public facilities?	☐	☐	☐	☒

4.15.1 Impact Analysis

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?

Less Than Significant Impact. Fire prevention, fire protection, and emergency medical services in the Project area are provided by the City of Anaheim's (City) Anaheim Fire & Rescue. Anaheim Fire & Rescue is a City service agency that provides fire protection, life safety services, medical and emergency response, disaster preparedness, community risk reduction homeland security, urban search and rescue, and hazardous material response to its service area of approximately 350,000 residents and more than 2 million annual visitors. Currently, Anaheim Fire & Rescue has a total of 11 stations providing services to a geographical area of 50 square miles.[57] Anaheim Fire & Rescue Station No. 6 is located approximately 1 mile northeast of the project site at 1330 S Euclid Street and is the station that would be the first to serve the project area in the event of an emergency.

The proposed project would not increase the City's number of employed firefighters or indirectly increase the City's population. Additionally, the proposed project would not increase the need for fire protection services, or adversely affect the City Fire Department's ability to provide service to the site via existing equipment and personnel. Therefore, a less than significant impact would occur, and no mitigation is required.

[57] Anaheim Fire & Rescue. n.d. Administration Greetings. Website: https://www.anaheim.net/665/Administration (accessed July 28, 2023).

ii. 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 is located at 425 S. Harbor Boulevard, approximately 2.2 miles southwest of the project site.[58] As described above, the proposed project would not result in an increase of residents or demand for police protection services or facilities. No long-term road closures or closures during peak travel hours are anticipated through the proposed project area during construction of the proposed development project. Additionally, the proposed project would adhere to all applicable policies and codes related to the provision of police services. Therefore, impacts on police services would be less than significant, and no mitigation is required.

iii. Schools?

No Impact. The project site is located within the Anaheim Elementary School District and Anaheim Union High School District (AUHSD) boundaries. The Anaheim Elementary School District consists of 24 schools including preschool and elementary schools and provides education services to approximately 17,000 students.[59] Two Anaheim Elementary School District schools within the vicinity of the project site include Madison Elementary School at 1510 S. Nutwood Street located approximately 1 mile northwest, and Stoddard Elementary School at 1841 S. Ninth Street, located approximately 1 mile southeast. The Anaheim Union High School District has a student population of approximately 31,000, includes 21 campuses and covers 46 square miles, stretching across the cities of Anaheim, Cypress, Buena Park, La Palma, and Stanton.[60] Three Anaheim Union High School schools within the vicinity of the project site include AUHSD Independent Studies School (Polaris High School) and Gilbert High School, located approximately 1 mile northwest at 1800 W. Ball Road, and Loara High School located approximately 0.6 mile northwest at 1765 W. Cerritos Avenue.

The proposed project does not include any residential uses that would increase population growth, generate an increased demand for school facilities, or require the construction of school facilities. As such, the operation of the proposed project would not result in an increase in demand for schools and would not trigger the need for new or altered school facilities. No new facilities would be required to be constructed to accommodate the proposed project. Therefore, the project would have no impacts related to schools, and no mitigation would be required.

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58 Anaheim Police Department. n.d. Website: https://www.anaheim.net/6098/Police-Department (accessed July 28, 2023).

59 Anaheim Elementary School District. n.d. District Overview. Website: https://anaheimelementary.org/district-overview/ (accessed July 28, 2023).

60 Anaheim Union High School District. n.d. About Anaheim Union High School District. Website: https://www.auhsd.us/District/Department/14207-ANAHEIM-UHSD/80408-About-Anaheim-Union-High-School-District.html (accessed July 28, 2023).

iv. Parks?

No Impact. According to the City's Green Element,[61] the City owns and operates nearly 63 parks and special use facilities totaling 689.2 acres and two 18-hole golf courses. The Green Element established a standard of 2.0 acres of parkland per 1,000 residents. According to the United States Census Bureau 2022 QuickFacts for the City of Anaheim, the population in the City is approximately 344,461.[62] Based on this population, this target is being met, with approximately 2.0 acres of parkland available per 1,000 residents.[63] The closest park to the project site is Energy Field Park, located approximately 0.6 mile northeast.

The proposed project does not include any residential uses and, therefore, would not increase the City's population or result in an increased demand for parks. As described above in Response 4.15(a), the proposed project would not increase the number of on-site employees and would not increase the City's population or demand for parks by inducing relocation or population growth. Therefore, no impacts would occur, and no mitigation would be required.

v. Other public facilities?

No Impact. Other public facilities, not previously mentioned above, may include, but are not limited to, libraries, recreational facilities that are not parks (parks are addressed above in 4.15(a)(iv)), and public works/maintenance services (trash, street sweeping, sewers, storm drains, transit, etc.). There is one library within 1.0 mile of the project site. The Anaheim Public Library – Euclid Branch is located approximately 0.75 mile north of the project site at 1340 S. Euclid Avenue. As described above in Response 4.15(a), the proposed project would not increase the number of employees and would not increase the City's population or demand for libraries by inducing relocation or population growth. As such, the operation of the proposed project would not result in an increase in demand for libraries and would not trigger the need for new or altered library facilities. No new facilities would be required to be constructed to accommodate the proposed project. Therefore, the project would have no impacts related to public libraries, and no mitigation would be required.

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61 City of Anaheim. 2004c. General Plan Green Element. Website: https://www.anaheim.net/DocumentCenter/View/9521/F-Green-Element?bidId= (accessed July 26, 2023).

62 United States Census Bureau. 2022. QuickFacts Anaheim City, California. Website: https://www.census.gov/quickfacts/fact/table/anaheimcitycalifornia/PST045222 (accessed July 28, 2023).

63 689.2 acres / (344,461/1,000 residents) = 2.0 acres / 1,000 residents

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4.16 RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

4.16.1 Impact Analysis

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?

No Impact. The proposed project does not include any residential uses nor would the proposed project result in any new employment opportunities compared to existing conditions. As described above in Section 4.14, Population and Housing, in Response 4.14(a), the proposed project would not increase the City's population or demand for parks or other recreation facilities by inducing relocation or population growth. Additionally, the project does not propose, and would not create a need for, new or physically altered recreational facilities. Therefore, the proposed project would result in no impacts, and no mitigation would be required.

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4.17 TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b. 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?	☐	☐	☒	☐

The impact analysis below is based on the results of the Transportation Analysis Memorandum, (2023c), prepared by LSA Associates, Inc. for the proposed project, and included as Appendix I.

4.17.1 Impact Analysis

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. In its existing condition, the project site is currently developed with two self-storage buildings and a parking lot. The proposed project would be consistent with the current use of the project site and would not conflict with a plan, ordinance, or policy addressing the circulation system. Access to the proposed project would be provided via two driveways along Humor Drive. There are no existing or planned bicycle facilities along West Katella Avenue where the project site is located. Therefore, the proposed project would not impede or interfere with bicycle facilities as identified by the Bicycle Master Plan.[64] A bus route and pedestrian facilities run along West Katella Avenue past the project site; however, the project would maintain pedestrian sidewalks throughout the project area and would not interfere with the bus route. Additionally, the proposed project would provide 21 parking spaces for the self-storage facilities that are within the range of demand expected for the project and would provide adequate parking to accommodate peak parking demand. Therefore, the proposed project would be consistent with Goal 12.1 of the City of Anaheim's General Plan Circulation Element that ensures adequate parking is made available to residents, visitors, and businesses.[65] Therefore, the proposed project would not result in a significant conflict with the City's plans or policies addressing the circulation system, and no mitigation is required.

64 City of Anaheim. 2017a. Bicycle Master Plan. Website: https://www.anaheim.net/DocumentCenter/View/33379/2020-Bicycle-Master-Plan-and-Appendices (accessed July 31, 2023).

65 City of Anaheim. 2004a. General Plan Circulation Element. Website: https://www.anaheim.net/DocumentCenter/View/9520/D-0-Circulation-Element?bidId= (accessed July 31, 2023).

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

Less Than Significant Impact. Section 15064.3 of the *State CEQA Guidelines* codifies that project-related transportation impacts are typically best measured by evaluating the project's vehicle miles traveled (VMT). The City of Anaheim adopted its Traffic Impact Analysis Guidelines[66] (TIA Guidelines) in 2020, which include screening criteria for various project types that can be screened from project-level assessment because they are presumed to have a less than significant impact. The TIA Guidelines describe three project screening criteria: (1) transit priority areas screening, (2) low VMT-generating areas screening, and (3) project type screening. The TIA Guidelines state that a project only needs to fulfill one of the screening types to qualify for screening. As described in Appendix I, the project would fall under all three project screening criteria.

According to Attachment A of the City's TIA Guidelines, the project would be within a transit-priority area (i.e., high quality transit bus stops within 0.5 mile of the project site). The project Floor Area Ratio (FAR), parking supply, and Sustainable Communities Strategy (SCS) consistency also support the ability for this project to qualify for Type 1 project screening.

Also, according to Attachment B in the City's TIA Guidelines, the project would be located within a low-VMT area that generates less than 85 percent of the regional average VMT. This would qualify the proposed project for Type 2 project screening.

As shown in Table 4.17.A, the project is expected to generate a small number of daily trips (44 average daily trips [ADT]). Because the project would generate fewer than 110 daily vehicle trips, the project meets the criteria for a less than significant VMT impact under Type 3 project screening in the City's TIA Guidelines. Therefore, the proposed project would result in a less than significant impact, and a project-level VMT quantified analysis is not required under the City's TIA Guidelines.

Table 4.17.A: Trip Generation

Land Use	Size	Unit	ADT	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Trip Rates[1]									
Mini-Warehouse (151)	–	TSF	1.45	0.05	0.04	0.09	0.07	0.08	0.15
RV/Boat/Vehicle Storage[2]	–	Space	0.48	0.02	0.01	0.03	0.02	0.02	0.04
Trip Generation									
Existing Uses to be Demolished									
Mini-Warehouse	3.279	TSF	5	0	0	0	0	0	0
RV/Boat Storage	57	Spaces	27	1	1	2	1	1	2
Subtotal			32	1	1	2	1	1	2
Proposed Project									
Mini-Warehouse	52.661	TSF	76	3	2	5	4	4	8
New Trip Generation			**44**	**2**	**1**	**3**	**3**	**3**	**6**

[1] Trip rates are referenced from the Institute of Transportation Engineers *Trip Generation Manual,* 11th Edition (2021).
[2] The daily, total a.m., and p.m. peak-hour trips are based on survey data collected at the existing similar facilities in Chino and Ontario (2021). 50 percent inbound and 50 percent outbound is assumed for the peak hours of RV/Boat storage.
ADT = average daily trips TSF = thousand square feet

[66] City of Anaheim. 2020a. Traffic Impact Analysis Guidelines. Website: https://www.anaheim.net/DocumentCenter/View/32774/City-of-Anaheim-TIA-Guidelines-for-CEQA-Analysis-62020 (accessed July 31, 2023).

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)?

No Impact. As stated previously, access to the proposed project would be provided via two driveways along Humor Drive. Vehicular traffic to and from the project site would use the existing network of regional and local roadways that currently serve the area surrounding the project site. Based on the temporary nature of the construction activities and trips, and the low trip generation for daily operations, project vehicles would not create operational deficiencies or related hazards to the public roadways when accessing the project site. Therefore, the proposed project would result in no impacts related to traffic safety due to a design feature (e.g., substandard roadway and/or roadway design), and no mitigation would be required.

d. Would the project result in inadequate emergency access?

Less Than Significant Impact. As stated previously, access to the proposed project would be provided via two driveways along Humor Drive. Adequate emergency access would be provided to and from the project site along West Katella Avenue and Humor Drive. Additionally, access to/from the project site must be designed to City standards and would be subject to review by the Anaheim Fire & Rescue and the Anaheim Police Department for compliance with fire and emergency access standards and requirements. Therefore, approval of the project plans would ensure that the proposed project's impacts related to emergency access would be less than significant, and no mitigation is required.

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4.18 TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)? Or	☐	☐	☒	☐
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

4.18.1 Impact Analysis

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

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

Less Than Significant Impact. As described in Section 4.5, Cultural Resources, the project site is currently developed with two storage buildings. The larger building was determined to not meet the criteria for listing in the California Register of Historical Resources (California Register) or the City of Anaheim's criteria for designation as a Historically Significant Structure. Additionally, the smaller storage building on site is modern (less than 50 years old) and does not require evaluation for historical significance. Impacts related to historic resources are therefore considered less than significant. No mitigation is required.

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

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

Less Than Significant with Mitigation Incorporated. Consistent with requirements of Assembly Bill (AB) 52 (required for projects subject to CEQA analyses), the City sent letters to tribes that have expressed an interest in being consulted regarding Native American resources for projects being undertaken by the City. Letters were sent to the following interested tribal organizations on August 31, 2023:

- Gabrieleño Band of Mission Indians – Kizh Nation
- Juaneno Band of Mission Indians – Acjachemen Nation
- Soboba Band of Luiseno Indians

The Gabrieleño Band of Mission Indians – Kizh Nation requested consultation with the City regarding the proposed project. Consultation was conducted from September 2023 to February 2024. The Gabrieleño Band of Mission Indians – Kizh Nation requested monitoring during ground-disturbing activities, as outlined in Mitigation Measure MM-CUL-1.

4.18.2 Mitigation Measures

The following mitigation measure, included in Section 4.5, Cultural Resources, is required to reduce potential tribal cultural resource impacts to a less than significant level:

Mitigation Measure MM-CUL-1 **Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.**

- The property owner/developer or contractor as designee shall provide evidence in the form of an executed Agreement to the City of Anaheim Planning and Building Department that they have retained a qualified Native American tribal monitor to provide third-party monitoring during construction-related ground disturbance activities and to recover and catalogue tribal resources as necessary. The tribal monitor shall be from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The agreement shall include (i) professional qualifications of the Native American monitor; (ii) detailed scope of services to be provided including, but not limited to, pre-construction education, observation, evaluation, protection, salvage, notification, and/or curation requirements, as applicable, with final documentation/report to the Public Works Inspector; (iii) contact information; (iv) communication protocols between the contractor and monitor for scheduling to

facilitate timely performance; (v) acknowledgment that if the tribal monitor is unavailable or unresponsive based on terms stipulated in the agreement, property owner/ developer or contractor, as designee, may contract with another qualified tribal monitor acceptable to the City. The selection of the qualified professional(s) shall be subject to City acceptance based on generally accepted professional qualifications and certifications, as applicable. The cover sheet of the grading plans shall include a note to identify that third party tribal monitoring is required during excavation and grading activities in accordance with the City-approved Agreement. Contact information for the approved tribal monitor shall be provided by the contractor to the City inspector at the pre-construction meeting.

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4.19 UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

4.19.1 Impact Analysis

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. The proposed project would connect to existing utility infrastructure through established utility easement agreements.

Water. The City of Anaheim relies on a combination of imported water, local groundwater, and a small amount of recycled water to meet its demands. The City works with the Metropolitan Water District of Southern California (Metropolitan) and the Orange County Water District (OCWD) to ensure safe and reliable water supply. The City's main source of water supply is groundwater from the Orange County Groundwater Basin (OC Basin). According to the City's 2020 Urban Water Management Plan (UWMP), the City historically relied on approximately 70 percent groundwater (previous 10-year average) and 30 percent imported water from Metropolitan to supply its customers. Metropolitan's primary sources of water are the Colorado River via the Colorado River Aqueduct (CRA) and the Lake Oroville watershed in northern California through the State Water Project (SWP). With the expansion of OCWD's Groundwater Replenishment System (GWRS), groundwater supplies are anticipated to

increase from 77 percent to between 80 to 85 percent of total water use over the 25-year planning period.[67]

According to the 2020 UWMP, the City's water supply is forecast to meet projected water demands through 2045 during normal years, single dry years, and multiple dry years. The Plan concludes that there is sufficient water supply through 2045, with demand projected to be 66,217 acre feet per year (AFY) and supply to be 68,418 AFY in 2045.

Short-term demand for water may occur during excavation, grading, and construction activities on site. Construction activities would require water primarily for dust mitigation purposes. Water from the existing potable water lines in the vicinity of the project site would be used. Overall, short-term construction activities would require minimal water and are not expected to have any adverse impacts on the existing water system or available water supplies. The proposed project would not require the construction of new or expanded water conveyance, treatment, or collection facilities with respect to construction activities. Therefore, the impacts on water facilities during construction would be less than significant, and no mitigation is required.

Water demand associated with the operation of the proposed project would be similar to existing site conditions as a new self-storage facility would be constructed to replace an existing building. According to water demand factors included in the California Emissions Estimator Model (CalEEMod, Version 2022.1.12), the proposed project is estimated to demand 12,224,764 gallons per year (gal/yr) (12,025,000 gal/yr for indoor use and 199,764 gal/yr for outdoor use) or 37.54 AFY.[68] Based on the City of Anaheim's water demand of 56,912 AFY in 2020, the proposed project would represent approximately 0.0007 percent of the current annual water demand.[69] The project-generated increase in water demand would be negligible and would fall within the City's existing capacity and available supply. As such, the proposed project would not necessitate new or expanded water entitlements, and the City would be able to accommodate the increased demand for potable water.

The project site is served by municipal water through existing water lines buried along the adjacent roadways. Therefore, the proposed project would not require or result in the construction of new water facilities, or the expansion of existing facilities, which could cause a significant environmental impact, and the impact would be less than significant. No mitigation is required.

Wastewater. The proposed project site is situated within the West Anaheim Master Plan of Sanitary Sewers (WAMPSS)[70], which was adopted in 2019 and evaluates the sewer system within the western portion of the City to identify potential deficiencies. The WAMPSS study area evaluated the existing sewer system, which includes approximately 870,000 linear feet of sewer pipelines. A majority of the wastewater within the WAMPSS drains into one of the Orange County Sanitation District's (OCSAN)

67 City of Anaheim. 2020b. Urban Water Management Plan. Website: https://www.anaheim.net/777/Urban-Water-Management-Plan (accessed August 1, 2023).

68 LSA Associates, Inc. 2023a. Air Quality and Greenhouse Gas Technical Memorandum. May.

69 City of Anaheim. 2020b. Urban Water Management Plan. Website: https://www.anaheim.net/777/Urban-Water-Management-Plan (accessed August 1, 2023).

70 City of Anaheim. 2019. West Anaheim Master Plan of Sanitary Sewers. Website: https://www.anaheim.net/DocumentCenter/View/27618/West-Anaheim-MPSS-2019 (accessed August 1, 2023).

trunk sewers for further treatment and final discharge. OCSAN has trunk sewers at Knott Avenue, Orange Avenue, Magnolia Avenue, and Euclid Avenue. The remainder of the wastewater flows into neighboring cities including the City of Buena Park, the City of Stanton, and the City of Garden Grove. The OCSAN provides wastewater collection, treatment, and recycling services for approximately 2.6 million people in Orange County, via its 15 pump stations, 533 miles of sewers, and 479 square miles of service area.[71] In 2021–2022, OCSAN received an average daily flow of 179 million gallons per day of wastewater. Additionally, OCSAN supplies the Orange County Water District with 130 million gallons per day of treated wastewater for the joint program known as Groundwater Replenishment System (GWRS). Through GWRS, the treated wastewater is purified and injected into a seawater barrier and pumped to recharge basins to protect groundwater. The GWRS produces enough new potable water for nearly 850,000 residents in north and central Orange County.

The wastewater treatment plants that serve the City have been designed to treat typical wastewater flows from different land uses. The proposed project would generate wastewater flows typical of a self-storage facility. As stated above, it is anticipated that the proposed project's water demand would be 12,025,000 gal/yr for indoor use and 199,764 gal/yr for outdoor use, and therefore, approximately 33,492 gallons per day (gpd).[72] The project site is provided with existing sanitary sewer services from buried utilities along adjacent roadways. The proposed project is anticipated to generate 33,492 gpd of wastewater, which is less than 0.0003[73] percent of the available daily treatment capacity at OCSAN. OCSAN is in compliance with the Santa Ana Regional Water Quality Control Board's (RWQCB) wastewater treatment requirements and has the capacity to accommodate the increased wastewater flows from the proposed project. Therefore, development of the proposed project would not require, nor would it result in, the construction of new wastewater treatment or collection facilities or the expansion of existing facilities other than those facilities to be constructed on site Therefore, impacts related to wastewater facilities is less than significant, and no mitigation is required.

Stormwater Drainage. The City of Anaheim Department of Public Works has an ongoing storm drainage master planning program for eight primary storm drainage tributary areas in the City. The proposed project is within the Anaheim Barber City Channel Tributary Area (ABCCTA)[74] in the City of Anaheim. The ABCCTA consists of Drainage Areas 4, 12, 14, and 19 through 23. The proposed project is located within Drainage Area 12. Runoff from Drainage Areas 4 and 12 is carried in storm drains across the City limits and discharges into the Anaheim-Barber City Channel approximately 2,000 feet downstream within the City of Stanton. Drainage Area 12 drains approximately 792 acres with water generally flowing over land from the northeast to the southwest and then from north to south via the

71 Orange County Sanitation District (OCSAN). 2022. Facts and Key Statistics. Website: https://www.ocsan.gov/residents/information/brochures/-folder-460 (accessed August 1, 2023).

72 12,224,764 (gal/yr) / 365 day / yr = 33,492.48 gallons per day

73 33,492 gpd / 130 million gpd = 0.000257% = 0.0003%

74 City of Anaheim. 2015. Drainage Watersheds. Website: https://ca-anaheim.civicplus.com/Document Center /View/13842/Storm-Drainage-Master-Plan-Watershed-Areas?bidId= (accessed August 1, 2023).

Brookhurst storm drain which discharges into the Anaheim-Barber City Channel approximately 2,200 feet south of Katella Avenue, in the City of Garden Grove.[75]

The proposed project would not result in an increase in impervious surface area on site. As discussed in Section 4.10, Hydrology and Water Quality, the proposed project would comply with the City's MS4 Permit, which regulates urban stormwater runoff, surface runoff, and drainage that flow into the MS4 system. Under the MS4 Permit, the City is responsible for regulating inflows to and discharges from its municipal storm drainage system. Specifically, the City's Public Works/Environmental Compliance Division is charged with the task of ensuring the implementation of the MS4 Permit requirements within the City. Implementation of Regulatory Compliance Measure RCM-WQ-1, as provided in Section 4.10, which requires developing a Stormwater Pollution Prevention Plan (SWPPP) with construction BMPs in compliance with the Construction General Permit, and Regulatory Compliance Measures RCM-WQ-2 and RCM-WQ-3, also provided in Section 4.10, which require compliance with the City's MS4 Permit and Anaheim Municipal Code Section 10.09.070, would reduce any impacts to stormwater and drainage facilities to less than significant. Similar to existing conditions, stormwater runoff on the project site would drain toward southwest towards the Anaheim-Barber City Channel. Therefore, impacts to stormwater drainage facilities would be less than significant with the incorporation of Regulatory Compliance Measures RCM-WQ-1, RCM-WQ-2, and RCM-WQ-3. No mitigation is required.

Electric Power. Anaheim Public Utilities provides electrical power to the City, serving approximately 358,000 people over an area of 50 square miles. According to Anaheim Public Utilities, the total amount of electricity sales in Fiscal Year 2021/22 was 2,682,356 megawatt-hours (MWh), or 2,682.356 giga-watt hours (GWh).[76] According to the California Energy Commission, total electricity consumption for Orange County in 2021 was 18,392 GWh.[77]

Short-term construction activities would be limited to providing power to the staging area and portable construction equipment and would not substantially increase demand for electricity. The heavy equipment used for construction would primarily be powered by diesel fuel. Given the limited nature of potential demand for electricity during construction and the availability of existing power lines on the site, there would not be a need to construct new or alter existing electric transmission facilities. Impacts to local regional supplies of electricity would be less than significant, and no mitigation is required.

The proposed project site has a pad-mounted, utility-company-owned electrical transformer. Dry utilities, including electricity, would be provided to the site from existing infrastructure available. Operation of the proposed project would incrementally increase on-site electricity demand. CalEEMod Version 2022.1.12 was used to calculate the approximate annual electricity demand of the

[75] City of Anaheim. 2009. Master Plan of Storm Drainage for Anaheim Barber City Channel Tributary Area. Website: https://www.anaheim.net/DocumentCenter/View/9161/Barber-Channel?bidId= (accessed August 1, 2023).

[76] Anaheim Public Utilities. 2023b. About Electric Services. Website: https://www.anaheim.net/2104/About-Electric-Services (accessed August 1, 2023).

[77] California Energy Commission (CEC). 2021a. Electricity Consumption by County. Website: https://ecdms.energy.ca.gov/elecbycounty.aspx (accessed August 1, 2023).

proposed project. The proposed project would be required to adhere to all federal, State, and local requirements for energy efficiency, which would substantially reduce energy usage. Based on the CalEEMod outputs, the estimated potential increase in electricity demand associated with the operation of the proposed project is 275,051 kilowatt-hours (kWh) per year. Total electricity consumption for Orange County in 2021 was 18,392 GWh (1.8392×10^{10} kWh). Therefore, operation of the proposed project would increase the annual electricity consumption in Orange County by less than 0.00002 percent.[78] Service providers utilize projected demand forecasts in order to provide an adequate supply or plan for surplus in their service areas. Because the proposed project would only represent a small fraction of electricity demand in Orange County, the proposed project would meet Title 24 requirements and sufficient electricity supplies would be available; therefore, energy demands for the proposed project would be less than significant. No mitigation would be required.

Natural Gas. Southern California Gas Company (SoCal Gas) provides natural gas to the City of Anaheim. SoCal Gas delivers natural gas to 21.1 million consumers through 5.9 million meters in more than 500 communities in a 24,000-square-mile service area throughout Central and Southern California, from Visalia to the Mexican border. Total natural gas consumption in Orange County in 2021 was 580 million therms.[79] The proposed project will not use natural gas for construction or operation. Therefore, construction activities would not impact natural gas services, and the proposed project would not require new or physically altered gas transmission facilities. The project would not require or result in the relocation or construction of new or expanded gas facilities, the construction of which could cause significant environmental effects. No mitigation would be required.

Telecommunications Facilities. Cable, internet, and telephone services are provided to the City's residents by major third-party purveyors. Cellular services provided by all major cellular networks are available in the City. Construction activities associated with the proposed project would not increase the demand for telecommunications facilities. In addition, the proposed project would not involve the construction or relocation of new or expanded telecommunications facilities. Further, the proposed self-storage facility would not increase telecommunication demands on the project site. Therefore, implementation of the proposed project would not result in impacts related to the construction or relocation of existing telecommunications facilities, and no mitigation would be required.

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. As stated previously, implementation of the proposed project would not substantially increase the demand for water supplies on the project site. As previously stated above, the proposed project would maintain similar water demand from existing conditions because the proposed project would construct a new self-storage facility to replace an existing self-storage building. The proposed project would not necessitate new or expanded water entitlements, and the City would be able to accommodate the incrementally increased demand for potable water. Therefore, water demand from the proposed project would have sufficient water supplies available to serve the project from existing entitlements and resources and would not require new or expanded

[78] 275,051kWh / 1.8392×10^{10} kWh = .000015%

[79] California Energy Commission (CEC). 2021b. Gas Consumption by County. Website: http://www.ecdms.energy.ca.gov/gasbycounty.aspx (accessed August 1, 2023).

entitlements. Therefore, impacts related to water supplies would be less than significant, and no mitigation would be required.

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

Less Than Significant Impact. As stated previously, implementation of the proposed project would not result in a substantial increase in demand for wastewater services on the project site. Impacts related to wastewater are considered less than significant, and no mitigation would be required.

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. The City of Anaheim contracts with Republic Services to provide solid waste services including bulky item collection, container exchange, container rentals, and extra trash service. Republic Services is responsible for all residential, commercial, and industrial waste and recycling services. Solid waste in the City is disposed of in the Orange County landfills including Frank R. Bowerman Landfill in Irvine, Olinda Alpha Landfill in Brea, and Prima Deshecha Landfill in San Juan Capistrano. According to CalEEMod calculations, the proposed project would generate 48.9 tons of solid waste per year or 0.13 tons of solid waste per day. Currently, the Frank R. Bowerman Landfill permits up to 11,500 tons of waste per day, the Olinda Alpha Landfill permits up to 8,000 tons of waste per day, and the Prima Deshecha Landfill permits up to 4,000 tons of waste per day.[80]

Therefore, the proposed project would add a small amount of waste for the three landfills that would have adequate capacity to serve the proposed project. Additionally, the project proposes a self-storage use that would not generate volumes or types of waste not already considered under the City's General Plan and zoning for the project site, and as addressed under existing policies and regulations. Impacts to solid waste disposal would be less than significant, and no mitigation measures would be required.

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

No Impact. The California Integrated Waste Management Act (Assembly Bill [AB] 939) changed the focus of solid waste management from landfill to diversion strategies (e.g., source reduction, recycling, and composting). The purpose of the diversion strategies is to reduce dependence on landfills for solid waste disposal. As stated in Response 4.19(d), above, the proposed project would generate a small amount of waste. The proposed project would comply with existing and future statutes and regulations, including waste diversion programs mandated by City, State, or federal law. In addition, as discussed above, the proposed project would not result in an excessive production of solid waste that would exceed the capacity of the existing landfill serving the project site. Therefore,

[80] California Department of Resources, Recycling, and Recovery (CalRecycle). 2023. Solid Waste Information System. Website: https://www2.calrecycle.ca.gov/SolidWaste/Site/Search (accessed August 1, 2023).

the proposed project would not result in an impact related to federal, State, and local statutes and regulations related to solid waste, and no mitigation would be required.

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4.20 WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

4.20.1 Impact Analysis

a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. Portions of the City of Anaheim are within a Fire Hazard Severity Zone. CalFire Fire Hazard Severity Zone Map for Orange County indicates the project site is not within a State Responsibility Area.[81] The project site is located in a Non-Very High Fire Hazard Severity Zone (Non-VHFHSZ) zone within a Local Responsibility Area. The project site is bordered by urban development, and not within any evacuation zones.

Temporary construction activities would not impede the use of the road for emergencies or emergency response vehicles access. Project design and site access would adhere to Anaheim Fire and Rescue Department standard designs. Therefore, with respect to wildfire potential, the proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan. No mitigation is required.

[81] California Department of Forestry and Fire Protection (CAL FIRE). 2023. Orange County Very High Fire Hazard Severity Zones in LRA As Recommended by CAL FIRE. Website: https://osfm.fire.ca.gov/media/jbtnayye/fhsz_county_sra_11x17_2022_orange_3.pdf (accessed July 19, 2023).

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

No Impact. As discussed in Response 4.20(a), the project site is located in a Non-Very High Fire Hazard Severity Zone (Non-VHFHSZ) zone within a Local Responsibility Area.[82] The project site and its surrounding areas are relatively flat and located within an urban area. Therefore, the proposed project would not exacerbate wildfire risks or expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. No mitigation is required.

c. 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. As discussed in Response 4.20(a), the proposed project site is located in a Non-Very High Fire Hazard Severity Zone (Non-VHFHSZ) zone within a Local Responsibility Area.[83] The project site and surrounding areas are developed with urban uses, and the proposed commercial development would maintain this character on site. The proposed project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. No mitigation is required.

d. 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 As discussed in Response 4.20(a), the proposed project site is located in a Non-Very High Fire Hazard Severity Zone (Non-VHFHSZ) zone within a Local Responsibility Area.[84] The topography of the surrounding areas and entire project site is relatively flat. Therefore, the proposed project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. No mitigation is required.

82 California Department of Forestry and Fire Protection (CAL FIRE). 2011. Orange County Very High Fire Hazard Severity Zones in LRA As Recommended by CAL FIRE. Website: https://osfm.fire.ca.gov/media/6739/fhszl_map30.pdf (accessed July 19, 2023).

83 Ibid.

84 Ibid.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

4.21.1 Impact Analysis

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

Less Than Significant Impact with Mitigation Incorporated. As articulated in Section 4.4, Biological Resources, no special-status or endangered species are expected to occur within the project area or to be affected by the proposed project.

Because the vegetation communities and other land cover types on the project site may provide nesting habitats for a wide variety of bird species, the proposed project would be required to avoid impacts on nesting resident and/or migratory birds either by avoiding vegetation removal during the avian nesting season (February 1 through August 31) or by implementing Regulatory Compliance Measure RCM-BIO-1, as detailed in Section 4.4, Biological Resources.

There is no temporary or permanent removal of riparian or wetland vegetation that would occur by implementation of the proposed project. Temporary indirect impacts to the quality of the environment during project construction activities include the potential for water quality-related impacts such as loose soil or pollutants inadvertently entering the drainage features located within and adjacent to the project area. The proposed project would comply with the National Pollutant Discharge Elimination System (NPDES) Construction General Permit and the Orange County MS4 Permit, to reduce impacts to a less than significant level. Such impacts would be avoided or minimized

with implementation of the Construction Best Management Practices (BMPs) and Water Quality BMPs as outlined in Regulatory Compliance Measure RCM-WQ-1, as provided in Section 4.10, Hydrology and Water Quality. Additionally, the proposed project would not 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 existing buildings on site do not meet the criteria for listing in the California Register or the City's criteria for designation as a Historically Significant Structure, therefore, the proposed project would not impact historic resources. For these reasons, no mitigation is required. Additionally, a literature review concluded that no archaeological resources exist on the project site. However, there is a potential to encounter unknown archaeological resources during construction and excavation activities that extend 5–8 ft below ground surface. With implementation of Mitigation Measure MM-CUL-1, which requires archaeological monitoring during construction, potential impacts to unknown archaeological resources would be reduced to a less than significant level.

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

Less Than Significant Impact with Mitigation Incorporated. The proposed project would result in potentially significant impacts specific to the proposed project for noise. However, with the implementation of the identified mitigation (MM-NOI-1, as identified in Section 4.13, Noise) and regulatory compliance measures, those impacts would be reduced to a less than significant level. No cumulative noise impacts would occur. The air quality and greenhouse gas analyses included an analysis of cumulative impacts and determined that no cumulatively significant impacts would occur. All other analyses reviewed impacts which were either less than significant, or reduced to less than significant, and would not contribute to cumulative impacts. There are no further mitigation measures that would be required to reduce any cumulative impacts to less than significant levels for the proposed project.

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

Less Than Significant Impact with Mitigation Incorporated. The following sections in this Initial Study reviewed the potential for adverse impacts on human beings, either directly or indirectly: (4.3) Air Quality; (4.7) Geology and Soils; (4.8) Greenhouse Gas Emissions; (4.9) Hazards and Hazardous Materials; (4.10) Hydrology and Water Quality; (4.13) Noise; and (4.17) Transportation. After analyzing all potential impacts, it has been determined that there would be no adverse effects on human beings associated with implementation of the proposed project. With the implementation of MM-NOI-1, impacts on humans would be less than significant.

5.0 LIST OF PREPARERS

5.1 AGENCY REVIEWERS

5.1.1 City of Anaheim

The following individuals reviewed and provided input on the Draft Initial Study/Mitigated Negative Declaration (IS/MND) and Technical Reports:

- Heather Allen, Deputy Director
- Nicholas Taylor, Principal Planner
- Amanda Lauffer, Senior Planner
- Jose Barriga, Senior Planner

5.2 IS/MND PREPARERS

5.2.1 LSA

The following individuals were involved in the preparation of this Draft IS/MND:

- Ashley Davis, Principal in Charge
- Giana Gurrera, Environmental Planner/Project Manager
- Olivia Gastaldo, Environmental Planner
- Amy Fischer, Executive Vice President, Principal, Air Quality Group
- Cara Cunningham, Associate, Air Quality Group
- Casey Tibbet, Associate, Architectural Historian
- J.T. Stephens, Principal, Noise and Vibration Group
- Moe Abushanab, Mechanical Noise Engineer
- Ken Wilhelm, Principal, Transportation Group
- Jessica Quigley, GIS Specialist
- Jason Thomas, Graphics Technician
- Lauren Johnson, Technical Editor
- Chantik Virgil, Senior Word Processor

5.3 TECHNICAL REPORT PREPARERS

The following were involved in the preparation of the technical reports in support of this Draft IS/MND. The nature of their involvement is summarized below.

5.3.1 Gorian & Associates, Inc.

The following individual was involved in the preparation of the *Geotechnical Site Evaluation and Storm Water Infiltration Test Report for the Proposed 4 Level, Self-Storage Building Extra Space Storage #1974 1761 West Katella Avenue, Anaheim, California* (March 30, 2023):

- Jerome J. Blunck, GE 151

5.3.2 Coory Engineering

The following individual was involved in the preparation of the *Hydrology Study* (June 12, 2023a) and the *Water Quality Management Plan (WQMP)* (June 12, 2023b):

- Samir M. Khoury, Engineer

5.3.3 AES Due Diligence, Inc.

The following individuals were involved in the preparation of the *Phase I Environmental Assessment* (September 29, 2021):

- Bennett McKenzie, Engineer
- Stephen J. Baker

5.3.4 LSA Associates, Inc.

The following individuals were involved in the preparation of the Noise and Vibration Impact Memorandum (July 31, 2023):

- J.T. Stephens, Principal
- Moe Abushanab, Noise Engineer

The following individuals were involved in the preparation of the Air Quality and Greenhouse Gas Technical Memorandum (May 23, 2023):

- Amy Fischer, Executive Vice President, Principal, Air Quality Group
- Cara Cunningham, Associate, Air Quality Group

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