

October 2025 | Initial Study

WYNDHAM HOTEL DENSITY MODIFICATION PROJECT

City of Anaheim

Prepared for:

City of Anaheim

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Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
ABCCTA	Anaheim Barber City Channel Tributary Area
ADT	average daily traffic
AFY	acre-feet per year
APN	Assessor's Parcel Number
AQMD	Air Quality Management District
AQMP	air quality management plan
ARSP	Anaheim Resort Specific Plan
ART	Anaheim Regional Transportation
C-R	Commercial Recreation
CAFE	corporate average fuel economy
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CGS	California Geological Survey
CMP	congestion management program
CNEL	community noise equivalent level
CO	carbon monoxide
CO ₂ e	carbon dioxide equivalent
CONCCP	County of Orange Natural Communities Conservation Plan
C-R	Commercial Recreation designation
CRA	Colorado River Aqueduct
dB	decibel
dBA	A-weighted decibel
DTSC	Department of Toxic Substances Control
EIR	environmental impact report
EOP	Emergency Operations Plan
FEMA	Federal Emergency Management Agency

Abbreviations and Acronyms

FHSZ	Fire Hazard Safety Zone
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
FSP	Final Site Plan
GHG	greenhouse gas
GPA	General Plan Amendment
GWh	Gigawatt-hours
GWRS	Groundwater Replenishment System
GSA	Groundwater Sustainability Agency
HCP	Habitat Conservation Plan
I-	Interstate
IPCC	Intergovernmental Panel on Climate Change
LCFS	Low Carbon Fuel Standards
LOS	level of service
LUST	Leaking Underground Storage Tank
Metropolitan	Metropolitan Water District of Southern California
MND	Mitigated Negative Declaration
MPAH	Master Plan of Arterial Highways
MRZ	Mineral Resource Zone
MTCO ₂ e	metric tons of carbon dioxide equivalent
MWh	megawatt-hours
ND	Negative Declaration
NO _x	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
O ₃	ozone
OC Basin	Orange County Groundwater Basin
OCSAN	Orange County Sanitation District
OCTA	Orange County Transit Agency
OCWD	Orange County Water District
PM	particulate matter
ppm	parts per million
PR	Public Recreation designation
RWQCB	Regional Water Quality Control Board

Abbreviations and Acronyms

SB	Senate Bill
SCAG	Southern California Association of Governments
SF	square foot/feet
SGMA	Sustainable Groundwater Management Act
SoCAB	South Coast Air Basin
SoCal Gas	Southern California Gas Company
South Coast AQMD	South Coast Air Quality Management District
SO _x	sulfur oxides
SPA	Specific Plan Amendment
SR	State Route
SWP	State Water Project
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TPA	Transit Priority Area
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UWMP	urban water management plan
V/C	volume-to-capacity ratio
VMT	vehicle miles traveled
VOC	volatile organic compound
WAMPSS	Central Anaheim Master Plan of Sanitary Sewers

Abbreviations and Acronyms

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1. Introduction

1.1 PROJECT OVERVIEW

The Wyndham Hotel Density Modification project (proposed project) involves an increase in the number of hotel rooms, from the previously permitted 78 rooms to 106 rooms, 1 caretaker unit, and changes to 6,394 square feet (SF) of accessory use.

Project implementation requires a General Plan Amendment (GPA), a Specific Plan Amendment (SPA) to the Anaheim Resort Specific Plan (ARSP), and an Administrative Adjustment to deviate from the Municipal Code required parking for the site. These are administrative changes and would result in no physical construction or changes to the footprint of the building and remainder of the site.

1.2 PURPOSE OF CEQA AND THE INITIAL STUDY

California Environmental Quality Act (CEQA; Public Resources Code Section 21000 et seq.) requires that before a lead agency makes a decision to approve a project that could have one or more adverse effects on the physical environment, the agency must inform itself about and consider the project's potential environmental impacts, inform the public about the project's potential environmental impacts, give them an opportunity to comment on the environmental issues, and take feasible measures to avoid or reduce potential harm to the physical environment.¹

The City of Anaheim—in its capacity as lead agency pursuant to CEQA Guidelines Section 15050—is responsible for preparing environmental documentation in accordance with CEQA to determine if approval of the discretionary actions and subsequent development associated with the proposed project would have a significant impact on the environment. As part of the project's environmental review and in its capacity as lead agency, the City authorized the preparation of this Initial Study in accordance with the provisions of CEQA Guidelines Section 15063. Pursuant to Section 15063, the purposes of an Initial Study are to:

- Provide the lead agency with information to use as the basis for deciding whether to prepare an environmental impact report (EIR) or negative declaration.
- Enable an applicant or lead agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a negative declaration.
- Assist in the preparation of an EIR, if one is required.
- Facilitate environmental assessment early in the design of a project.

¹ Pursuant to Public Resources Code Section 21067, lead agency refers to the public agency that has the principal responsibility for carrying out or approving a project that may have a significant effect on the environment.

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- Provide documentation of the factual basis for the finding in a negative declaration that a project will not have a significant effect on the environment.
- Eliminate unnecessary EIRs.
- Determine whether a previously prepared EIR could be used with the project.

As further defined by Section 15063, an Initial Study is prepared to provide the City with information to use as the basis for determining whether an EIR, Negative Declaration (ND), or Mitigated Negative Declaration (MND) would be appropriate for providing the necessary environmental documentation and clearance for the proposed project.

In its preparation of this Initial Study, the City determined that an MND is the appropriate CEQA document for the proposed project. This Initial Study has been prepared to support the adoption of an MND, which is a written statement by the lead agency that briefly describes the reasons why a project that is not exempt from the requirements of CEQA will not have a significant effect on the environment and, therefore, does not require preparation of an EIR (CEQA Guidelines Section 15371). The CEQA Guidelines require preparation of an MND if the Initial Study prepared would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur; and 2) there is no substantial evidence, in light of the whole record before the lead agency, that the project may have a significant effect on the environment. (CEQA Guidelines Section 15070[b]).

The City has considered the information contained in this Initial Study in its decision-making processes. The Initial Study was prepared with consultant support, and the analysis, conclusions, and findings made as part of its preparation represent the independent judgment and analysis of the City.

1.3 PROJECT LOCATION

The approximately 0.97-acre project site is located at 515 West Katella Avenue in the central portion of the City of Anaheim in Orange County. The Assessor's Parcel Number (APN) is 082-271-05. Regional access to the project site is from Interstate 5 (I-5), approximately 0.6 miles to the east via West Katella Avenue, and from State Route 22 (SR-22), approximately 2.5 miles to the south via South Harbor Boulevard (see Figure 1, *Regional Location*, and Figure 2, *Local Vicinity*).

1.4 ENVIRONMENTAL SETTING

1.4.1 Existing Land Use

The project site is fully developed with the 114,142-square-foot (SF) Wyndham Hotel, which has four stories and one level of subterranean parking (see Figure 3, *Site Aerial*). The Wyndham Hotel includes 106 rooms, 1 caretaker unit, 6,394 SF of accessory uses, 13,281 SF of landscaping, hardscaping, 98 parking stalls, and a driveway off West Katella Avenue.

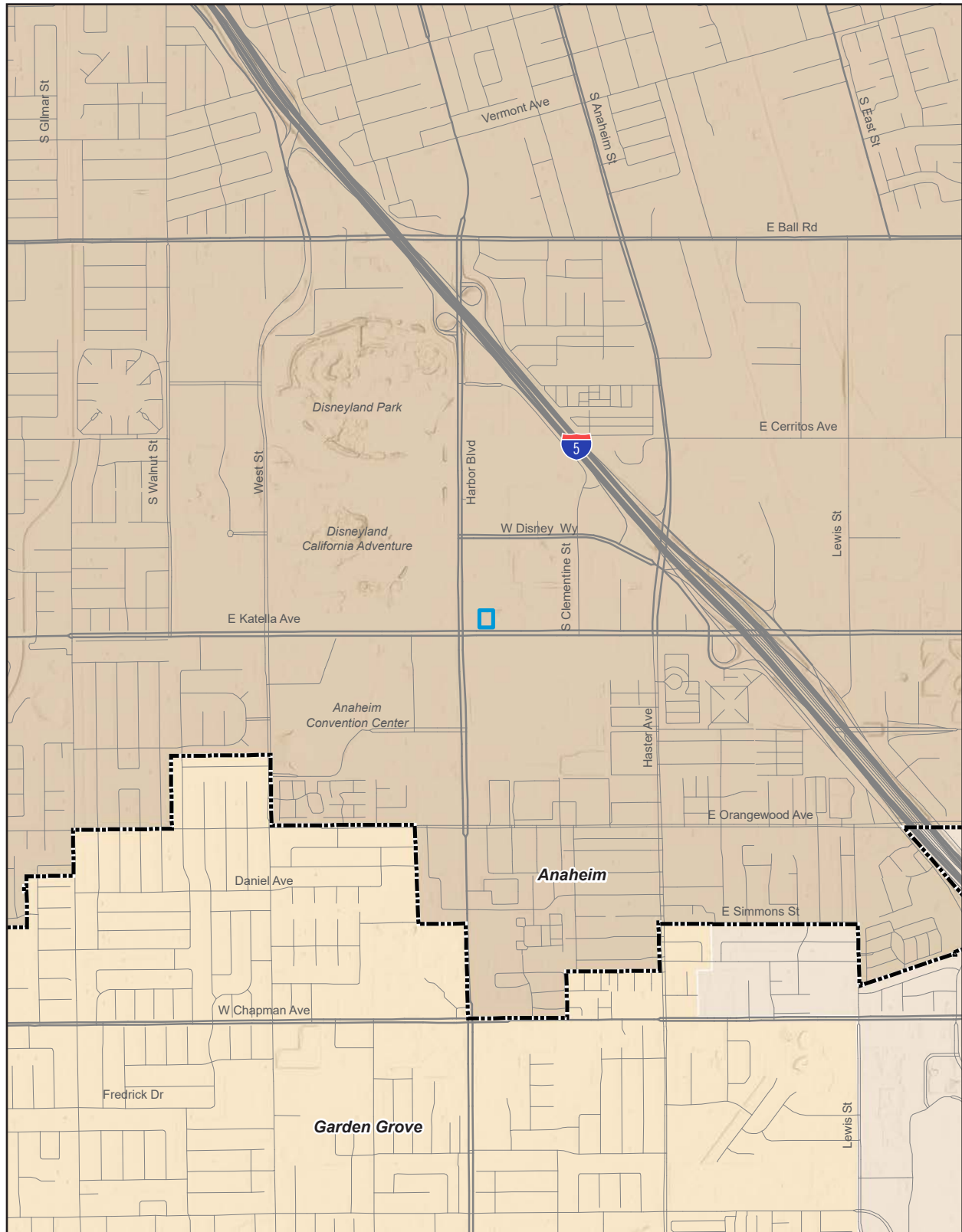


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1. Introduction

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Figure 2 - Local Vicinity



--- City of Anaheim Boundary
— Project Boundary

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Scale (Feet)

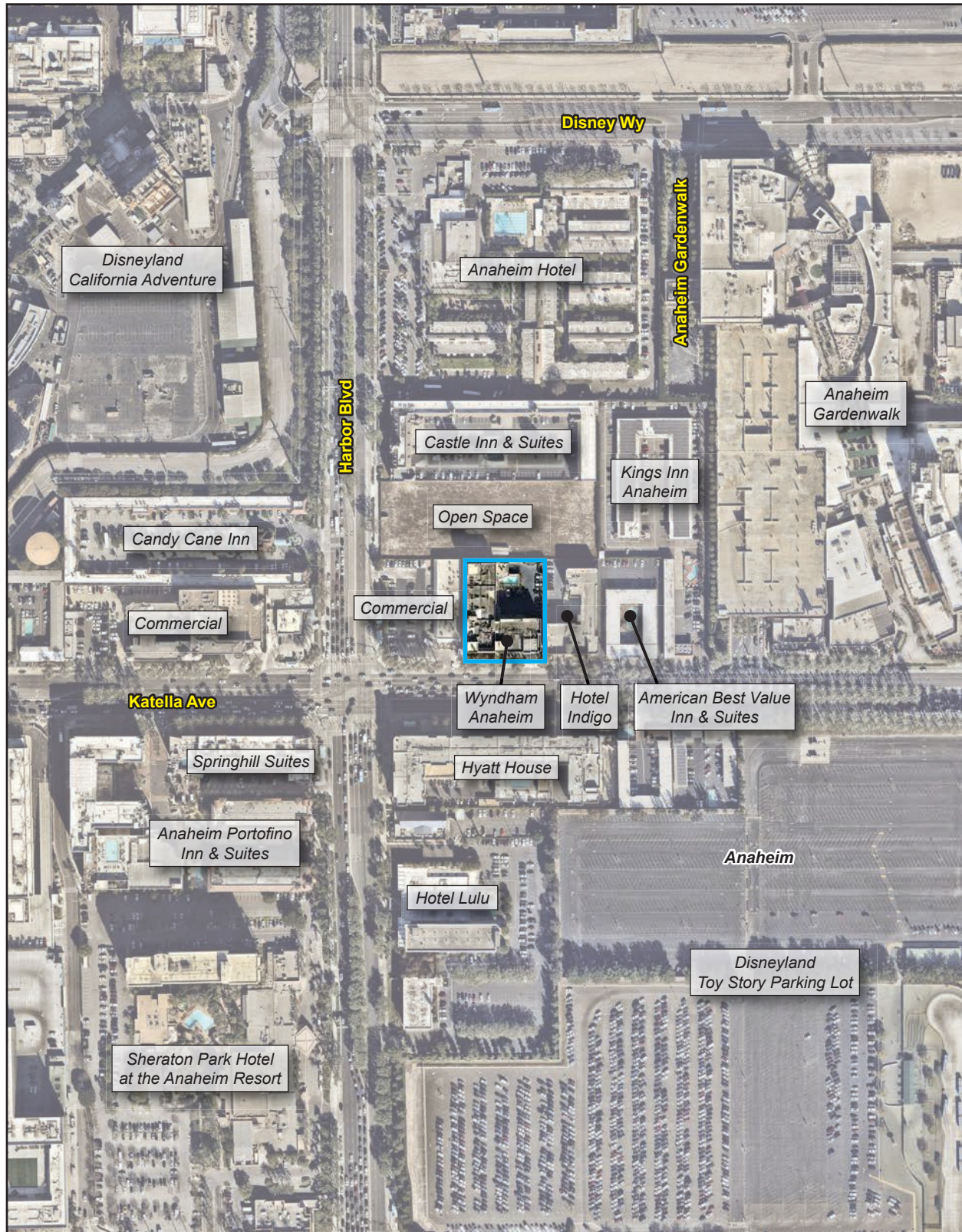


Source: Generated using ArcMap 2025.

1. Introduction

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Figure 3 - Aerial View



----- City Boundary
----- Project Boundary

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Scale (Feet)



Source: Nearmap 2025.

1. Introduction

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1. Introduction

1.4.2 Surrounding Land Use

Surrounding land uses include existing hotels to the east and south across West Katella Avenue. Commercial uses are located directly to the west, with a vacant parcel and additional hotel uses to the north of the project site (see Figure 3, *Site Aerial*).

1.4.3 General Plan and Zoning Designations

The General Plan land use designation for the project site is C-R (Commercial Recreation). This designation is intended to provide for tourist- and entertainment-related industries, such as theme parks, hotels, tourist-oriented retail, movie theaters, and other visitor-serving facilities (Anaheim 2004a). This designation is implemented by various Specific Plan zones, which further define the maximum development intensities within this designation. The project site is in the Anaheim Resort Specific Plan (ARSP) (SP 92-2) area. The ARSP provides development guidelines for approximately 581.3 acres in the Anaheim Resort area. The ARSP is divided into two development areas: Development Area No. 1, Commercial Recreation (C-R) District, and Development Area No. 2, Public Recreation (PR) District. The PR District encompasses the Anaheim Convention Center and associated parking facilities and provides for the orderly use of City-owned property as well as the existing Anaheim Hilton Hotel.

The ARSP identifies maximum development density designations in the C-R District. These designations allow for a certain number of hotel rooms per parcel or acre, and up to 20 percent of each hotel/motel project's gross square footage, excluding parking facilities, to be developed with integrated accessory uses. These accessory uses will reduce the otherwise maximum permitted hotel/motel density at the rate of one hotel/motel room per 600 gross SF of accessory use. The project site is designated Low-Medium Density in the ARSP C-R District, which allows up to 75 rooms per gross acre or 75 rooms per lot or parcel, whichever is greater (Anaheim 2004b). When Amendment No. 14 to the ARSP was certified, the project parcel size was 1.04 acres, which allowed for a maximum buildout of 78 rooms for the project site. Additional public right-of-way dedication along the street frontage of West Katella Avenue has reduced the parcel size to the current size of 0.97 acres.

1.5 PROJECT DESCRIPTION

The original Wyndham Hotel building plans were designed with several dual suites that included two bedrooms and two bathrooms with internal connecting doors and one keyed entry door. Following the City's approval of the project as proposed, additional entry doors were added to the dual suite rooms to create two separate keyed rooms. Some dual suites also had their interior connecting doors removed. This resulted in an increase in the total number of rooms from 72 to 107. Changes were also made to the use of space on the first floor with no addition of any square footage. Space that was previously approved for lobby guest areas, storage, and offices were converted to additional conference and meeting rooms and a restaurant that is open to the public (an increase in 6,394 SF of accessory structures). These were all changes made to the interior of the building and the overall developed footprint of the building and remainder of the site did not change.

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Therefore, the applicant, Wyndham Hotel, is seeking approval for the already completed increase in the number of rooms, from the permitted 78 hotel rooms to 106 hotel rooms, 1 caretaker unit, and an increase of 6,394 SF in accessory uses. Per the City's Municipal Code requirements, "any accessory use, that is not identified as 'limited strictly to the use of guests and/or employees of such hotel' within Table 116-E (Accessory Uses Incidental to and Integrated within a Hotel or Motel Including Suite-Type Hotels, and Otherwise Limited Herein: C-R District (Development Area 1)) will reduce the otherwise maximum permitted hotel/motel density at the rate of one hotel/motel room per six hundred (600) gross square feet of accessory use." Based on this requirement and the existing accessory uses of 6,394 SF, the project includes a change from 78 rooms to 118 hotel-equivalent rooms.

The proposed project would include a GPA to create a new density category "Medium Density (Modified B)" to allow for up to 107 rooms and 6,394 SF of accessory uses. The proposed project would also require a SPA to the ARSP to create a new density category "Medium Density (Modified B)." Associated density maps and density category descriptions would be updated in the ARSP and Municipal Code.

1.6 REQUIRED ACTIONS AND APPROVALS

This Initial Study is intended to serve as the primary environmental document for all future actions and approvals associated with the proposed project, including all discretionary and nondiscretionary/ministerial actions and approvals requested or required to implement the proposed project.

A discretionary action is an action taken by a government agency that calls for an exercise of judgment in deciding whether to approve a project. Following is a discussion of the discretionary actions and approvals required by government agencies with oversight of the proposed project.

1.7 LEAD AGENCY

The City of Anaheim is the lead agency under CEQA and has the principal approval authority over the proposed project. Following is a list and discussion of the various discretionary actions and approvals required for project implementation.

- Adoption of an MND and Mitigation Monitoring Program (MMP)
- Approval of a GPA
- Approval of a SPA to the ARSP
- Approval of an Administrative Adjustment to deviate from the code-required parking for the site

1.8 RESPONSIBLE AND TRUSTEE AGENCIES

A responsible agency is a public agency that proposes to carry out or approve a project for which a lead agency is preparing or has prepared an environmental document. For the purposes of CEQA, the term "responsible agency" includes all public agencies other than the lead agency that have discretionary approval power over the project. The term trustee agency means a state agency having jurisdiction by law over natural resources that are held in trust for the people of California and could be affected by a project.

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There are no responsible or trustee agencies for this project.

1.9 INCORPORATION BY REFERENCE

The information in this Initial Study is based, in part, on the following documents that include the project site or provide information addressing the general project area or use.

- **City of Anaheim General Plan.** The Anaheim General Plan gives long-range guidance and direction for decisions affecting the future character of Anaheim. It is the blueprint and official statement of the community's physical development as well as its economic, social, and environmental goals. The Anaheim General Plan was used throughout this Initial Study as the fundamental planning document governing development on the project site.
- **City of Anaheim Zoning Code.** Title 18 (Zoning) of the Anaheim Municipal Code is the regulating tool that the City uses to implement the Anaheim General Plan; it establishes the basic regulations under which land in the city is developed and used. This includes regulations and controls for the design and improvement of development sites, allowable uses, building setback and height requirements, and other development standards. The intent of Title 18 of the Municipal Code is to promote and protect the public health, safety, convenience, and welfare of present and future citizens of Anaheim. Title 18 of the Municipal Code was used throughout this Initial Study as a fundamental regulatory document governing development on the project site.
- **Anaheim Resort Specific Plan.** The purpose of the ARSP is to provide a long-range comprehensive plan for future development of approximately 581.3 acres in the Anaheim Resort, which includes the project site. The ARSP establishes an overall identity and land use plan that is intended to maximize the area's potential, guide future development, and ensure a balance between growth and infrastructure. The ARSP includes specific zoning and development standards, design guidelines, a streetscape program, and a public facilities plan. The ARSP was used throughout this Initial Study as a fundamental regulatory document governing development on the project site.

1.10 BASELINE CONDITIONS

CEQA requires that when evaluating the potential impacts of a project, the analysis must examine impacts against the physical environmental conditions existing at the time the environmental analysis commences, or what is referred to as the environmental baseline. "This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant" (CEQA Guidelines Section 15125(a)). Use of the term "normally" allows for deviation of the baseline from existing conditions, if substantial evidence is provided for the rationale.

The Wyndham Hotel was approved by the Planning Commission under FSP 95-03, which allowed for the development of a 4-story, 72-room, suite-type hotel. In 1994, the ARSP EIR No. 313 (SCH Number 91091062) was certified by the City as the environmental documentation for the adoption of the ARSP. At the time FSP 95-03 was approved, EIR No. 313 was used for environmental compliance for the ARSP area. An Environmental Compliance Form was filled out detailing the specifics of the project as approved by FSP 95-

1. Introduction

03, and the City found that the project's environmental effects fall within the impacts analyzed in EIR No. 313. EIR No. 313 served as the required documentation for CEQA compliance and no further CEQA analysis was required.

In 2012, the City Council certified EIR No. 340 in support of the approval of Amendment No. 14 to the ARSP, which included a GPA, SPA, Zoning Code amendment, and updates to the Identity Program and Public Realm Landscape Program. Amendment No. 14 allowed for an increase in permitted development intensity within the ARSP area to allow for expansion of the Anaheim Convention Center; streamlining development standards, guidelines, and requirements to reduce redundancy; and an overall update to referenced documents to reflect current conditions within the Anaheim Resort.

EIR No. 340 is a supplemental EIR that reevaluated all the environmental changes that have occurred in and around the Anaheim Resort since the certification of EIR No. 313. Consistent with EIR No. 313, EIR No. 340 assumed that future development of the project site would include development of 75 rooms per acre or parcel. EIR No. 340 also evaluated an expansion of the Anaheim Convention Center and an update of the ARSP document. The Anaheim City Council adopted findings and a statement of overriding considerations, updated and modified Mitigation Monitoring Program No. 85C, and a water supply assessment in conjunction with the certification of EIR No. 340. When EIR No. 340 was certified, the project parcel size was 1.04 acres, which allowed for a maximum buildout of 78 rooms for the project site. Additional public right-of-way dedication along the street frontage of West Katella Avenue has reduced the parcel size to the current size of 0.97 acres.

Although the proposed modifications evaluated in this IS/MND have been already developed, the environmentally cleared development density for the project site per EIR No. 340, 75 rooms per parcel or acre (78 rooms), has been used throughout this IS/MND as the "baseline conditions" to compare to the impacts of the proposed project.

All references within this IS/MND for the Proposed Project reflect conditions inclusive of all previously approved amendments and adjustments to the ARSP and EIR No. 340 and includes all additional environmental analysis associated with these amendments. Pursuant to Section 15179(b) of the CEQA Guidelines, EIR No. 340, as a Master EIR, is still valid and represents an accurate assessment of the significant environmental effects associated with buildout of the ARSP. EIR No. 340 is incorporated by reference and mitigation measures from EIR No. 340 (MMP 85C) that are applicable to the Proposed Project are included in this IS/MND.

2. Environmental Checklist

2.1 PROJECT INFORMATION

1. Project Title:

Wyndham Hotel Density Modification Project

2. Lead Agency Name and Address:

City of Anaheim
Planning and Building Department
200 S. Anaheim Boulevard, Suite 162
Anaheim, California 92805

3. Contact Person and Phone Number:

Amanda Lauffer, Senior Planner
(714) 765-4479
alauffer@anaheim.net

4. Project Location:

The approximately 0.97-acre project site is located at 515 West Katella Avenue in the central portion of the City of Anaheim in Orange County. Regional access to the project site is from Interstate 5 (I-5), approximately 0.6 miles to the east via West Katella Avenue, and from State Route 22 (SR-22), approximately 2.5 miles to the south via South Harbor Boulevard.

5. Project Sponsor's Name and Address:

Union Investment USA, LLC
515 W. Katella Avenue
Anaheim, CA 92802

6. General Plan Designation:

Commercial Recreation (C-R)

7. Zoning:

Anaheim Resort Specific Plan, C-R District

8. Description of Project:

The Wyndham Hotel Density Modification project involves an increase in the number of hotel rooms, from the previously permitted 78 rooms to 106 rooms, 1 caretaker unit, and changes to 6,394 square feet (SF) of accessory use.

Project implementation requires a General Plan Amendment (GPA), a Specific Plan Amendment (SPA) to the Anaheim Resort Specific Plan (ARSP), and an Administrative Adjustment to deviate from the

2. Environmental Checklist

Municipal Code required parking for the site. These are administrative changes and would result in no physical construction or changes to the footprint of the building and remainder of the site.

9. Surrounding Land Uses and Setting:

Surrounding land uses include existing hotels to the east and south, across West Katella Avenue. Commercial uses are located directly to the west, with a vacant parcel and additional hotel uses to the north of the project site.

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

Not Applicable

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

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

The following California Native American tribes are on the City of Anaheim's notification list pursuant to Assembly Bill (AB) 52:

- Cahuilla Band of Indians
- Gabrieleno Band of Mission Indians - Kizh Nation
- Gabrieleno/Tongva San Gabriel Band of Mission Indians
- Gabrielino Tongva Indians of California Tribal Council
- Gabrielino/Tongva Nation
- Gabrielino-Tongva Tribe
- Juaneño Band of Mission Indians Acjachemen Nation 84A
- Juaneño Band of Mission Indians Acjachemen Nation – Belardes
- Pala Band of Mission Indians
- Santa Rosa Band of Cahuilla Indians
- Soboba Band of Luiseno Indians

The City notified these tribes on May 8, 2025, and received three responses. On June 13, 2025, the Gabrieleno Band of Mission Indians - Kizh Nation tribe sent a letter responding to the City and requested consultation. The City followed up with the tribe on June 13, 2025, noting that the project does not involve any ground disturbing activities. The Gabrieleno Band of Mission Indians Kizh - Nation's tribal representative responded on June 16, 2025, stating that consultation would not be needed and

2. Environmental Checklist

asking to be notified if any type of ground disturbances would occur in the future. On July 2, 2025, the Pala Band of Mission Indians responded in two separate letters for AB52 and SB18. The tribe responded stating that they confirmed the proposed project is not within the boundaries of the recognized Pala Indian Reservation. No other tribes responded to request consultation.

2. Environmental Checklist

2.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

2.3 DETERMINATION (TO BE COMPLETED BY THE LEAD AGENCY)

Based on this initial evaluation:

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

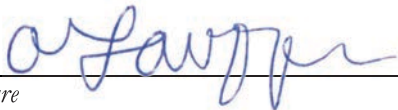
☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

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

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

Signature



10/8/2025

Date

2. Environmental Checklist

2.4 EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors, as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) **Earlier Analyses Used.** Identify and state where they are available for review.
 - b) **Impacts Adequately Addressed.** Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) **Mitigation Measures.** For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

2. Environmental Checklist

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
- the significance criteria or threshold, if any, used to evaluate each question; and
 - the mitigation measure identified, if any, to reduce the impact to less than significance.

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

2. Environmental Checklist

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

2. Environmental Checklist

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

2. Environmental Checklist

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

2. Environmental Checklist

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

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION.				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X
XVII. TRANSPORTATION. Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?		X		
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?		X		
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
d) Result in inadequate emergency access?			X	
XVIII. TRIBAL CULTURAL RESOURCES.				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code 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		X		
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code 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.		X		
XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	

2. Environmental Checklist

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

3. Environmental Analysis

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

3.1 AESTHETICS

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

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

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 specifies that the City’s Hill and Canyon Area, which is in the eastern portion of the city, contains many natural slopes (Anaheim 2004a). 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 approximately 16 miles west of the Santa Ana Mountains and approximately 8 miles west of the Hill and Canyon Area (Anaheim 2004b). The Dad Miller Golf Course is approximately 4 miles north of the project site.

The current use of the project site is commercial recreation, with the 114,142 SF Wyndham Hotel, which includes four stories, one level of subterranean parking, and a parking lot. The approximately 0.97-acre project site is surrounded by a mixture of tourist-oriented commercial uses. The proposed project site is immediately bounded to the east and west by hotels and commercial uses, to the north by open space and Castle Inn and Suites further north, and to the south by West Katella Avenue. The proposed project area and surrounding vicinity are characterized by flat topography and views 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.

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 there will be no change to the physical structure of the building. The project site is currently developed with a hotel that is operational, and all changes are interior and have already occurred. Therefore, because the proposed project is within existing buildings in an already built-

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out area of the city and no identified scenic vistas are within its proximity, implementation of the proposed project would not have the potential to damage scenic vistas, and no mitigation would be required.

b) 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 (Caltrans 2021). The nearest State-designated scenic highway to the project site is a segment of SR-91 approximately 4 miles north. 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 with a hotel that is operational, and all changes are interior and have already occurred. 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 and no mitigation would be required.

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

Less Than Significant With Mitigation Incorporated. According to the United States Census Bureau, the City of Anaheim is within the Los Angeles-Long Beach-Anaheim, CA Urbanized Area (USCB 2010a). As described in the CEQA Guidelines 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 (USCB 2010b). Because the City is in an urbanized area, the project site is also within an urbanized area.

The project site is currently zoned for Commercial Recreation (C-R) per the City of Anaheim Zoning Map (Anaheim 2022). No structures are being proposed that would diminish the existing visual character of the area or the quality of public views of the site and its surroundings. Due to the 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. However, mitigation measure MM 5.1-3 from MMP 85C as included within EIR No. 340 would be applicable to the proposed project. MM 5.1-3 is related to ongoing property maintenance during operations of the Wyndham Hotel and is renumbered in this IS/MND as mitigation measure MM 3.1-1.

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

No Impact. Existing sources of night lighting attributed to nearby commercial developments include streetlamps, accent lighting, parking lot lighting, and vehicle headlights. All construction-related activities associated with the proposed project were conducted within the existing building’s envelope. As a result, the proposed project is a request to permit and retain the previously completed work and does not involve any new

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exterior construction, grading, excavation, or ground-disturbing activities that would result in light and glare impacts at adjacent uses. Operation of the proposed project would not include any additional lighting. The project site is currently developed with a hotel that is operational, and all changes are interior and have already occurred.

Sources of glare during the day result primarily from parked cars and reflective surfaces such as glass building materials. The proposed project does not include additional parking or lighting and would not introduce a significant source of daytime glare. Lighting associated with the existing hotel on the project site conforms to the City's lighting regulations.

Based on these considerations, implementation of the proposed project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Therefore, there would be no impact, and no mitigation is required.

Mitigation Program

The following mitigation measure from MMP 85C would be applicable to the proposed project as included within EIR No. 340:

MM 3.1-1 Ongoing, the property owner/developer shall be responsible for the removal of any on-site graffiti within 24 hours of its application (ARSP EIR 340 MM 5.1-3).

3.2 AGRICULTURE AND FORESTRY RESOURCES

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

Would the project:

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

No Impact. The project site has no agricultural or farm uses, nor are there agricultural or farm uses in its immediate vicinity. No project-related farmland conversion impact would occur. The project site is listed as Urban and Built-Up Land and is not mapped as important farmland by the Division of Land Resource Protection (DOC 2022a). Therefore, no impact would occur, and no mitigation is required.

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

No Impact. The current zoning designation for the project site is ARSP with “Low-Medium Density,” which does not include agricultural uses. No structures are being proposed, and as such, the proposed project would not conflict with agricultural zoning or a Williamson Act contract because the site is not zoned for agricultural use. Therefore, no impact would occur, and no mitigation is required.

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

No Impact. Forest land is defined as “land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits” (Public Resources Code Section 12223 [g]). Timberland is defined as “land...which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees” (Public Resources Code Section 4526). Project development would not conflict with existing zoning for forestland, timberland, or timberland production because the project site is zoned as ARSP. Therefore, no impact would occur, and no mitigation is required.

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

No Impact. The project site is within an urbanized area. The project site is paved and contains ornamental vegetation. The project site currently operates as a hotel and no physical changes are proposed under the proposed project. No expansion of the building footprint or changes to the remainder of the site are proposed. Therefore, the proposed project would not result in the loss or conversion of forest land. Therefore, no impact would occur, and no mitigation is required.

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

No Impact. Maps from the Division of Land Resource Protection indicate that there is no important farmland or forest land on the project site or in the surrounding vicinity (DOC 2022a). Project development would not directly cause conversion of such land to non-agricultural or non-forest use. Therefore, no impact would occur, and no mitigation is required.

Mitigation Program

No mitigation is required.

3. Environmental Analysis

3.3 AIR QUALITY

This section addresses the impacts of the proposed project on ambient air quality and the exposure of people, especially sensitive individuals, to unhealthy pollutant concentrations. A background discussion on the air quality regulatory setting, meteorological conditions, existing ambient air quality in the vicinity of the project site, and air quality modeling can be found in Appendix A.

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

Furthermore, the South Coast AQMD has identified regional thresholds of significance for criteria pollutant emissions and criteria air pollutant precursors, including volatile organic compounds (VOC), CO, NO_x , SO_x , PM_{10} , and $PM_{2.5}$. Development projects below the regional significance thresholds are not expected to generate sufficient criteria pollutant emissions to violate any air quality standard or contribute substantially to an existing or projected air quality violation. Where available, the significance criteria established by the South Coast AQMD are relied upon herein to make the following determinations.

Would the project:

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

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

Changes in population, housing, or employment growth projections have the potential to affect SCAG's demographic projections and therefore the assumptions in South Coast AQMD's AQMP. The proposed project involves an increase in the number of hotel rooms, from 78 rooms to 106 rooms, adding 1 caretaker unit, and modifying approximately 6,394 SF of accessory uses within the existing hotel structure. As discussed in Section 3.14, *Population and Housing*, the proposed project would not expand the hotel building footprint and would not directly or indirectly induce substantial unplanned population growth. Based on its scope and nature, the proposed project would not substantially affect housing, employment, or population projections in the region.

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Additionally, as demonstrated in Section 3.3(b), the net regional emissions that would be generated during operation by the proposed increase of 28 hotel rooms, 1 caretaker unit, and 6,394 SF of new accessory uses would be less than the South Coast AQMD emissions thresholds and would therefore not be considered by South Coast AQMD to be a substantial source of air pollutant emissions that would have the potential to affect the attainment designations in the SoCAB. Therefore, the proposed project would not affect the regional emissions inventory or conflict with strategies in the 2022 AQMP. Impacts would be less than significant, and no mitigation is required.

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

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

Regional Short-Term Construction Impacts

All construction-related activities associated with the proposed project were conducted within the existing building's envelope and the proposed project would not include any new construction activities. As a result, the proposed project is a request to permit and retain the previously completed work and would not involve any new construction, grading, excavation, or ground-disturbing activities that would result in air quality impacts associated with construction. Therefore, no impact would occur.

Long-Term Operation-Related Air Quality Impact

Typical long-term air pollutant emissions are generated by area sources (e.g., landscape fuel use, aerosols, architectural coatings, and asphalt pavement), energy use (natural gas), and mobile sources (i.e., on-road vehicles); however, mobile source emissions account for most criteria air pollutant emissions during most land use development operations, such as the proposed project. This analysis quantifies the net increase in operational emissions associated with the proposed increase of 28 hotel rooms, 1 caretaker unit, and 6,394 SF of new accessory uses.

The net increase in vehicle trip generation accounts for an increase in hotel rooms allowed on-site from 78 to 118 hotel-equivalent rooms² (40 net new hotel-equivalent rooms) and assumes the 6,394 SF of new accessory uses would not generate new trips outside of hotel patrons already traveling to the project site. Based on the trip generation estimates provided by Linscott, Law & Greenspan Engineers (2025), the proposed project would generate a net increase of 320 vehicle trips (Appendix B).

It should be noted that the Traffic Circulation Analysis included the number of trips for the proposed project and shows that the proposed project (with a hotel equivalent of 118 rooms) generates approximately 943 daily trips, with 54 trips (30 inbound, 24 outbound) produced in the AM peak hour and 70 trips (36 inbound, 34 outbound) produced in the PM peak hour on a "typical" weekday. The Traffic Circulation Analysis based the Level of Service (LOS) analysis on a comparison between the proposed project and the current General Plan

² The net equivalent is calculated by adding the 106 hotel rooms and 1 caretaker unit (107 rooms) and converting the 6,394 SF using a conversion rate of 600 gross square feet of accessory use per hotel room equivalent (a total of 11 rooms) for a grand total of 118 hotel-equivalent rooms.

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entitlement for the project site. The baseline condition for this Initial Study, as described in Section 1.10, *Baseline Conditions*, is 78 rooms. The number of trips for a baseline of 78 rooms was calculated using the same methodology used in the Traffic Circulation Analysis. For 78 rooms, the Wyndham Hotel generates 623 daily trips, with 36 trips (20 inbound, 16 outbound) in the AM peak hour and 46 trips (23 inbound, 23 outbound) in the PM peak hour. This results in a net difference of 320 daily trips (18 AM peak-hour trips and 24 PM peak-hour trips) between the proposed project and baseline conditions.

As shown in Table 1, *Maximum Daily Regional Operation Emissions*, operation of the proposed project would result in net emissions that would not exceed the South Coast AQMD regional operation-phase significance thresholds. However, mitigation measure MM 5.2-1 from MMP 85C as included within EIR No. 340 would be applicable to the proposed project. MM 5.2-1 is related to the ongoing implementation of emission reduction measures during operations of the Wyndham Hotel and is renumbered in this IS/MND as mitigation measure MM 3.3-1.

Table 1 Maximum Daily Regional Operation Emissions

Source	Maximum Daily Emissions (lbs/Day)					
	VOC	NOX	CO	SO ₂	PM ₁₀	PM _{2.5}
Max Daily Emissions						
Mobile	1	1	8	<1	2	<1
Area	<1	<1	<1	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Total	1	1	8	<1	2	<1
South Coast AQMD Regional Threshold	55	55	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

Source: CalEEModVersion 2022.1., South Coast AQMD 2023.

Notes: lbs: Pounds. Highest winter or summer emissions are reported.

c) Expose sensitive receptors to substantial pollutant concentrations?

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

Construction

As previously stated, all construction-related activities associated with the proposed project were conducted within the interior of the building and the overall developed footprint of the building and remainder of the site did not change. As a result, the proposed project is a request to permit and retain the previously completed work and would not involve any new construction, grading, excavation, or ground-disturbing activities that would result in localized air quality impacts associated with construction. Therefore, no impact related to construction emissions affecting health risk or criteria air pollutant attainment status would occur.

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Operation

Operation of the proposed project would not generate substantial emissions from on-site stationary sources. Land uses that have the potential to generate substantial stationary sources of emissions include industrial land uses, such as chemical processing and warehousing operations where truck idling would occur on-site and would require a permit from South Coast AQMD. The proposed project does not fall within these categories of uses. The proposed modifications would not change the building square footage, which limits the changes to area sources and energy use source emissions. Lastly, the proposed project would result in a minimal increase in on-road mobile sources, with a net increase of 320 average daily vehicle trips principally from passenger vehicles (refer to Appendix B). Localized air quality impacts related to operation-related emissions would be less than significant.

Carbon Monoxide Hotspots

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

The SoCAB has been designated attainment under both the national and California AAQS for CO. However, South Coast AQMD does not have an adopted screening criteria to determine whether a project may have the potential to generate a CO hotspot. According to Bay Area Air District, under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection to more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—to generate a significant CO impact (Bay Area Air District 2023). The intersection with the greatest traffic volumes would yield 5,581 vehicles per hour based on the existing-plus-project traffic conditions, which would not exceed Bay Area Air District's recommended hourly screening criteria (refer to Figure 5-5 in Appendix B). Thus, the proposed project would not introduce new vehicle trips, which may result in a CO hotspot when combined with existing traffic volumes, and this impact would be less than significant, and no mitigation is required.

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

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

A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury

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or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

The type of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. The proposed project involves increasing the number of hotel rooms from 78 to 106, adding 1 caretaker unit, and modifying approximately 6,394 SF of accessory uses within the existing hotel building footprint. Consequently, the proposed project would not fall within the objectionable odors land uses, add new odors that are not already present under baseline conditions, or exacerbate existing odor sources. Odor impacts would be less than significant, and no mitigation is required.

Mitigation Program

The following mitigation measure from MMP 85C would be applicable to the proposed project as included within EIR No. 340:

MM 3.3-1 Ongoing during project operation, the property owner/developer shall implement measures to reduce emissions to the extent practical, schedule goods movements for off-peak traffic hours, and use clean fuel for vehicles and other equipment, as practicable (ARSP EIR 340 MM 5.2-1).

3.4 BIOLOGICAL RESOURCES

Would the project:

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

No Impact. The project currently serves as a hotel. The site is in a highly urbanized area of the city and is surrounded by a mix of tourist-oriented commercial uses. Based on the existing conditions of the project site and its surroundings, there is no riparian or native habitat within or in the vicinity of the project site, and no natural biological resources or communities exist on, adjacent to, or near the project site. There are only limited ornamental trees, a few shrubs, native grass, and weeds on the site. There would be no changes to the existing physical conditions of the site. Therefore, the proposed project would not result in 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. No impact would occur, and no mitigation is required.

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

No Impact. The project site is fully developed and is composed mostly of impervious surfaces with ornamental vegetation. There is no riparian, wetland communities, or other sensitive natural communities on-site or within disturbance distance. Additionally, there would be no changes to the existing physical conditions of the site. Therefore, there would be no impact and no mitigation is required.

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

No Impact. The proposed project site does not contain any wetlands nor is it adjacent to existing wetlands (USFWS 2020). The proposed project involves increasing the number of hotel rooms from 78 to 106, adding 1 caretaker unit, and modifying approximately 6,394 SF of accessory uses within the existing hotel structure. No expansion of the building footprint or changes to the remainder of the site are proposed. Therefore, no impact would occur, and no mitigation is required.

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

No Impact. There are no corridors valuable for overland wildlife movement or migration on, adjacent to, or in proximity to the project site. The project site and surroundings are in an urbanized area and not available for overland wildlife movement. No expansion of the building footprint or changes to the remainder of the site are proposed. Therefore, no impact would occur, and no mitigation is required.

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

No Impact. The project site is fully developed and is composed mostly of impervious surfaces with sparse ornamental vegetation. The proposed project involves increasing the number of hotel rooms from 78 to 106 rooms, adding 1 caretaker unit, and modifying approximately 6,394 SF of accessory uses within the existing hotel structure. No expansion of the building footprint or changes to the remainder of the site are proposed. Tree or vegetation removal is not proposed under the proposed project. Therefore, the proposed project would not interfere with local policies or a tree preservation ordinance. No impact would occur and no mitigation is required.

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

No Impact. The eastern portion of the City of Anaheim is under the jurisdiction of County of Orange Natural Communities Conservation Plan/Habitat Conservation Plan (CONCCP/HCP). The proposed project is not within or adjacent to the CONCCP/HCP boundary, nor does it involve any changes to project site

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conditions. Project implementation would not conflict with or have a substantial effect on any conservation plans.

Mitigation Program

No mitigation is required.

3.5 CULTURAL RESOURCES

Would the project:

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

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

- i) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
- ii) Is associated with the lives of persons important in our past;
- iii) Embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possesses high artistic values;
- iv) Has yielded, or may be likely to yield, information important in prehistory or history.

As shown in Figure 3, *Site Aerial*, the project site is currently operating as a hotel and is surrounded by tourist-oriented commercial uses. Furthermore, the project site is not identified on any federal or state historic registers or sources, including the National Register of Historic Places, the California Register of Historic Resources, the California Built Environment Resources Directory, the California Historical Landmarks, and the California Points of Historical Interest (CSP 2025). Since no physical changes would occur under the proposed project, there would be no expected impact on historical resources and no mitigation would be required.

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

No Impact. Archaeological resources are prehistoric or historic evidence of past human activities, including structural ruins and buried resources. As shown in Figure 3, *Site Aerial*, the project site is in a highly urbanized area of the city. The proposed project involves increasing the number of hotel rooms from 78 to 106 rooms, adding 1 caretaker unit, and modifying approximately 6,394 SF of accessory uses within the existing hotel structure. The project site is currently developed with a hotel that is operational, and all changes are interior

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and have already occurred. No expansion of the building footprint or changes to the remainder of the site are proposed. No ground-disturbing or new construction activities would occur under the proposed project and therefore the proposed project does not have the potential to adversely impact archaeological resources. Therefore, no impact would occur, and no mitigation is required.

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

No Impact. There are no known human remains or cemeteries on or near the project site. As shown in Figure 3, *Site Aerial*, the project site is in a highly urbanized area of the city. The proposed project involves increasing the number of hotel rooms from 78 to 106 rooms, adding 1 caretaker unit, and modifying approximately 6,394 SF of accessory uses within the existing hotel structure. The project site is currently developed with a hotel that is operational, and all changes are interior and have already occurred. No expansion of the building footprint or changes to the remainder of the site are proposed. No ground-disturbing or new construction activities would occur under the proposed project and therefore the proposed project does not have the potential to disturb human remains. No impact would occur, and no mitigation would be required.

Mitigation Program

No mitigation is required.

3.6 ENERGY

Would the project:

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

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

Short-Term Construction Impacts

The project site is currently developed with a hotel that is operational, and all changes made were interior and have already occurred. No expansion of the building footprint or changes to the remainder of the site are proposed. As a result, the proposed project is a request to permit and retain the previously completed work and would not involve any new construction activities. As a result, the proposed project does not involve any construction, grading, excavation, or ground-disturbing activities that would result in wasteful or unnecessary electricity demands during construction. No impact would occur.

Long-Term Impacts During Operation

Operation of the proposed project would generate slightly new demand for electricity, natural gas, and transportation energy on the project site. Operational use of energy would include heating, cooling, and ventilation of the additional permitted hotel rooms and ancillary uses; water heating; operation of electrical systems, and use of on-site equipment and appliances.

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Electrical Energy

Electrical service to the project site is provided by Anaheim Public Utilities through connections to existing on-site electrical lines as needed. As discussed further in Section 3.19, *Utilities and Service Systems*, the additional permitted hotel rooms and ancillary uses would experience a minimal increase in electricity demand on-site and a negligible amount compared to the total electricity consumption for Orange County. The proposed project would experience a slight increase in water heating demand and appliance use due to increased guest occupancy but would not substantially affect space heating or lighting electricity demand compared to baseline conditions because overall building space would not increase. All additions and alterations made to accommodate the proposed project would comply with applicable Building Energy Efficiency Standards and CALGreen standards in effect at the time, thereby improving the overall energy-efficiency performance of modified building spaces originally designed to earlier iterations of the Building Energy Efficiency Standards and CALGreen standards.

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

Natural Gas Energy

Natural gas services to the project site are provided by Southern California Gas Company (SoCal Gas), which provides natural gas throughout Central and Southern California (SoCal Gas 2025). As discussed further in Section 3.19, *Utilities and Service Systems*, the additional hotel rooms and ancillary uses would experience a minimal increase in natural gas demand on-site and a negligible amount compared to the total natural gas consumption for Orange County. The proposed project would experience a slight increase in water heating demand and appliance use due to higher occupancy but would not substantially affect space heating demand compared to baseline conditions. Furthermore, all additions and alterations made to accommodate the proposed project would comply with applicable Building Energy Efficiency Standards and CALGreen standards in effect at the time, thereby improving the overall energy-efficiency performance of modified building spaces originally designed to earlier iterations of the Building Energy Efficiency Standards and CALGreen standards. Therefore, the proposed project would not result in wasteful, inefficient, or unnecessary natural gas demands. Operation of the proposed project would result in less-than-significant impacts with respect to natural gas usage.

Transportation Energy

The proposed project would consume transportation energy during operations from the use of motor vehicles associated with employees and hotel guests. Transportation energy use is the result of the overall vehicle miles traveled (VMT), the mix of transportation modes, and the fuel type and efficiency of those modes.

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Based on the City of Anaheim Traffic Impact Analysis Guidelines for CEQA, the project site is within a Transit Priority Area (TPA) and would satisfy the City's screening criteria type (1) transit priority areas screening (see Appendix B). Therefore, the proposed project would be presumed to have a less-than-significant impact on VMT according to the City's guidelines.

Moreover, fuel efficiency of vehicles would on average continue to improve due to improvements in fuel efficiency attributable to the statewide fuel reduction strategies and regulatory compliances (e.g., Corporate Average Fuel Economy [CAFE] standards), resulting in new cars that are more fuel efficient and the attrition of older, less fuel-efficient vehicles. The CAFE standards are not directly applicable to land use development projects, but to car manufacturers. Thus, the employees and hotel guests do not have direct control in determining the fuel efficiency of vehicles that are manufactured and available. However, compliance with the CAFE standards by car manufacturers would ensure that vehicles produced in future years have greater fuel efficiency and would generally result in an overall benefit of reducing fuel usage by providing more fuel-efficient vehicle options. Therefore, impacts would be less than significant with respect to operation-related fuel usage and no mitigation is required.

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

Less Than Significant Impact. The state's electricity grid is transitioning to renewable energy under California's Renewable Energy Program. Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. Electricity production from renewable sources is generally considered carbon neutral. The RPS goals have been updated since the adoption of SB 1078 in 2002. In general, California has RPS requirements of 50 percent by 2026, 52 percent by 2027, 60 percent by 2030, 90 percent by 2035, 95 percent by 2040, and 100 percent by 2045.

The statewide RPS requirements do not directly apply to individual development projects, but to utilities and energy providers such as Anaheim Public Utilities, whose compliance with RPS requirements would contribute to the State's objective of transitioning to renewable energy. The land uses accommodated by the proposed project would not change (hotel use) and the proposed modifications were required to comply with the Building Energy Efficiency Standards and CALGreen in effect at the time. Therefore, implementation of the proposed project would not conflict with or obstruct implementation of California's RPS Program, and this impact would be less than significant, and no mitigation is required.

Mitigation Program

No mitigation is required.

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3.7 GEOLOGY AND SOILS

Would the project:

- a) **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**
 - i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

No Impact. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. Surface rupture is the most easily avoided seismic hazard. Fault rupture generally occurs within 50 feet of an active fault line and is limited to the immediate area where the fault breaks along the surface. The main purpose of the Alquist-Priolo Earthquake Fault Zoning Act is to prevent construction of buildings used for human occupancy on the surface of active faults to minimize the hazard of surface rupture of a fault to people and habitable buildings. Before cities and counties can permit development within Alquist-Priolo Earthquake Fault Zones, geologic investigations are required to show that the proposed development site is not threatened by surface rupture from future earthquakes.

The project site is not within or near an established Alquist-Priolo Earthquake Fault Zone and is not in a “Zone of Required Investigation” (CGS 2015a, 2015b). The nearest mapped active fault—that is, a fault that has ruptured during Holocene time (the last 11,700 years)—is the Newport-Inglewood-Rose Canyon Fault, approximately 11 miles southwest of the project site (CGS 2015a). The El Modeno Fault is approximately 3.5 miles northeast of the project site. The El Modeno Fault is classified as a Quaternary-Tertiary (QT) fault, indicating movement within the last few million years but with no confirmed Holocene activity. Due to the distance to the nearest active faults and the lack of recent movement on the El Modeno Fault, the potential for surface rupture on-site is considered very low.

The City of Anaheim, as well as most of southern California, is in a region of historic seismic activity. The existing structure was built in accordance with the requirements of 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. Additionally, the increase in hotel rooms and ancillary uses that have already been completed would marginally increase the number of guests on the project site. No physical changes to the existing development are proposed. Therefore, project development would not subject people or structures to hazards arising from surface rupture of a known active fault. No impact would occur, and no mitigation is required.

- ii) **Strong seismic ground shaking?**

Less Than Significant Impact. The most significant geologic hazard to the design life of the proposed project is the potential for moderate to strong ground shaking resulting from earthquakes generated on the

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faults in seismically active southern California. As with other areas in southern California, it is anticipated that the project site will likely be subject to strong ground shaking due to earthquakes on nearby faults.

As noted previously, the Newport-Inglewood-Rose Canyon Fault is 11 miles southwest of the project site. This and other faults in the region—Raymond fault zone (north Los Angeles basin section), approximately 24 miles northwest of the project site, and San Andreas Fault, approximately 40 miles northeast of the site (CGS 2015a)—are considered capable of producing strong shaking at the project site, thereby exposing people or structures on the site to potential substantial adverse effects, including the risk of loss, injury, or death. Earthquakes along these faults are generally capable of generating ground shaking of engineering significance to the project site. The intensity of ground shaking on the project site would depend on the magnitude of the earthquake, distance to the epicenter, and the geology of the area between the epicenter and the project site.

However, the project site is not at a greater risk of seismic activity or impacts than other sites in southern California. Seismic shaking is a risk throughout southern California. Additionally, California regulates development in the state through a variety of tools that reduce hazards from earthquakes and other geologic hazards. The existing structure, which would not be modified as a result of the proposed project, was designed and constructed in accordance with CBC regulations which include standards for earthquake resistance. The CBC contains provisions to safeguard against major structural failures or loss of life caused by earthquakes or other geologic hazards; it has provisions for earthquake safety based on factors including occupancy type, the types of soil and rock on-site, and the strength of ground motion with a specified probability of occurring on the project site. Compliance with the requirements of the CBC for structural safety during a seismic event reduce hazards from 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 refers to loose, saturated sand or silt deposits that behave as a liquid and lose their load-supporting capability when strongly shaken. Loose granular soils and silts that are saturated by relatively shallow groundwater are susceptible to liquefaction. Liquefaction occurs when three general conditions coexist: (1) shallow groundwater; (2) low-density noncohesive (granular) soils; and (3) high-intensity ground motion. Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer.

Maps of seismic hazard zones are issued by the California Geological Survey (CGS) in accordance with the Seismic Hazards Mapping Act enacted in April 1997. The intent of the Seismic Hazards Mapping Act is to provide for a statewide seismic hazard mapping and technical advisory program to assist cities and counties in developing compliance requirements to protect the public health and safety from the effects of strong ground shaking, liquefaction, landslides or other ground failure, and other seismic hazards caused by earthquakes.

The Earthquake Zones of Required Investigation Map, published by the CGS, indicates that the subject site is not within a designated liquefaction hazard zone (CGS 2015a). Additionally, no physical changes to site conditions would occur. Therefore, liquefaction is not considered a significant design concern for the

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proposed project. Therefore, impacts associated with liquefaction would be less than significant and no mitigation is required.

iv) Landslides?

Less Than Significant Impact. Landslides are the downslope movement of geologic materials. Slope failures in the form of landslides are common during strong seismic shaking in areas of steep hills. The overall site topography can be characterized as flat, with no notable change in elevation.

The project site is not within an area with the potential for earthquake-induced landslides according to the CGS and no physical changes are proposed (CGS 2015a). Therefore, 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, impacts would be less than significant, and no mitigation is required.

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

No Impact. The project site is currently developed with a hotel that is operational, and all changes are interior and have already occurred. No expansion of the building footprint or changes to the remainder of the site are proposed. As a result, the proposed project is a request to permit and retain the previously completed work and would not result in any new construction and therefore would not require grading and other soil-disturbing construction activities.

The proposed project would not increase the amount of impervious area of the project site; therefore, on-site stormwater flows would not increase and there would be no on-site erosion impacts. Therefore, there would be no impact and no mitigation is required.

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

Less Than Significant Impact. 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 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 previously, the site is not within a State-designated hazard zone for an earthquake-induced landslide. Therefore, there would be no impacts related to landslides.

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 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.

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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 would not be required for the proposed project. The project site is not within an area of known subsidence that may be associated with groundwater, peat loss, or oil extraction. Therefore, potential geotechnical hazards related to subsidence and collapse would be less than significant and no mitigation is required.

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

Less Than Significant Impact. Expansive soils contain 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. All changes associated with the proposed project are interior and have already occurred. As a result, the proposed project is a request to permit and retain the previously completed work and no ground-disturbing or new construction activities would occur under the proposed project. Therefore, potential impacts related to expansive soils would be less than significant and no mitigation is required.

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

No Impact. The proposed project includes sewer laterals connections to existing sewers in surrounding roadways. The proposed project would not involve construction of or the use of septic tanks or other alternative wastewater disposal systems. Therefore, no impact is expected to occur, and no mitigation is required.

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

No Impact. Paleontological resources are fossils, that is, the recognizable remains or evidence of past life on earth such as bones, shells, leaves, tracks, burrows, and impressions. The project site is currently developed with a hotel that is operational, and all changes are interior and have already occurred. The proposed project would not result in any new construction or any ground-disturbing activities and therefore does not have the potential to directly or indirectly destroy a unique paleontological resource or site or unique feature. Therefore, no impact is expected to occur, and no mitigation is required.

Mitigation Program

No mitigation is required.

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3.8 GREENHOUSE GAS EMISSIONS

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as greenhouse gases (GHGs), into the atmosphere. The primary source of these GHG is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide (CO₂), methane (CH₄), and ozone (O₃)—that are the likely cause of an increase in global average temperatures observed within the twentieth and twenty-first centuries. Other GHGs identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N₂O), sulfur hexafluoride (SF₆), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons.³

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

Would the project:

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

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

Since the proposed project would not expand the hotel building footprint, this analysis focuses on evaluating the new demand for mobile source emissions to the project site. Based on the traffic circulation analysis, the proposed project would result in a minimal increase in on-road mobile sources, with a net increase of 320 vehicle trips, and would satisfy the City’s screening criteria type (1) transit priority areas screening (Appendix B).⁶ The project vicinity is served by multiple transit services operated by Orange County Transit Agency

³ Water vapor (H₂O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant, but part of the feedback loop rather than a primary cause of change.

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

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

⁶ It should be noted that the Traffic Circulation Analysis included the number of trips for the proposed project and shows that the proposed project (with a hotel equivalent of 118 rooms) generates approximately 943 daily trips, with 54 trips (30 inbound, 24

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(OCTA) and Anaheim Regional Transportation (ART), which would help promote the use of public transportation and reduce transportation-related GHG emissions. The additional permitted hotel rooms and ancillary uses would result in a slight increase in water demand, wastewater and solid waste generation, area sources (e.g., consumer cleaning products), and energy usage (i.e., natural gas and electricity). However, operational GHG emissions from building energy use would be minimized because the proposed modifications were required to meet the Building Energy Efficiency Standards and CALGreen standards in effect at the time.

Project-related operation-phase GHG emissions are shown in Table 2, *Project-Related Operation GHG Emissions*. Overall, operation of the proposed project would not generate annual emissions that exceed the South Coast AQMD bright-line threshold of 3,000 metric tons of carbon dioxide equivalent (MTCO_{2e}) per year (South Coast AQMD 2010). Therefore, the proposed project's cumulative contribution to GHG emissions would be less than significant and no mitigation is required.

Table 2 Project-Related Operation GHG Emissions

Source	GHG (MTCO _{2e} /Year)
Mobile	264
Area	<1
Energy	<1
Water	<1
Solid Waste	<1
Refrigerants	<1
Total	264
South Coast AQMD Bright-Line Threshold	3,000 MTCO _{2e} /Yr
Exceeds Bright-Line Threshold?	No

Source: CalEEMod, Version 2022.1.

Notes: MTons = metric tons; MTCO_{2e} = metric ton of carbon dioxide equivalent

¹ Mobile emissions evaluate net increase from 78 rooms (baseline conditions) to 118 hotel-equivalent rooms allowed on-site.

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

Less Than Significant Impact. Applicable plans adopted for the purpose of reducing GHG emissions include CARB's Scoping Plan and the Southern California Association of Governments' (SCAG) Regional

outbound) produced in the AM peak hour and 70 trips (36 inbound, 34 outbound) produced in the PM peak hour on a "typical" weekday. The Traffic Circulation Analysis based the Level of Service (LOS) analysis on a comparison between the proposed project and the FSP 95-03 entitlement for the project site. FSP 95-03 allows 72 rooms on the project site. The baseline condition for this Initial Study, as described in Section 1.10, *Baseline Conditions*, is 78 rooms. The number of trips for a baseline of 78 rooms was calculated using the same methodology used in the Traffic Circulation Analysis. For 78 rooms, the Wyndham Hotel generates 623 daily trips, with 36 trips (20 inbound, 16 outbound) in the AM peak hour and 46 trips (23 inbound, 23 outbound) in the PM peak hour. This results in a net difference of 320 daily trips (18 AM peak hour trips and 24 PM peak hour trips) between the proposed project and baseline conditions.

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Transportation Plan/Sustainable Communities Strategy (RTP/SCS). A consistency analysis with these plans is presented below.

CARB Scoping Plan

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

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

Statewide strategies to reduce GHG emissions include the low carbon fuel standards, California Appliance Energy Efficiency regulations, California Renewable Energy Portfolio standard, changes in the CAFE standards, and other early action measures as necessary to ensure the State is on target to achieve the GHG emissions reduction goals of AB 32, SB 32, and AB 1279. In addition, the proposed project would not alter the existing land use (hotel use), and the proposed modifications were required to comply with the Building Energy Efficiency Standards and CALGreen in effect at the time. The proposed project would comply with these GHG emissions-reduction measures since they are statewide strategies. Therefore, the proposed project would not obstruct implementation of the 2022 Scoping Plan, and impacts would be less than significant, and no mitigation is required.

SCAG's Regional Transportation Plan/Sustainable Communities Strategy

SCAG adopted the 2024-2050 RTP/SCS, Connect SoCal, in April 2024. Connect SoCal is a long-term plan for the Southern California region that details the development, integrated management, and operation of transportation systems and facilities that will function as an intermodal transportation network for the SCAG metropolitan planning area (SCAG 2024). This plan outlines a forecasted development pattern that demonstrates how the region can sustainably accommodate needed housing and job centers with multimodal mobility options. The overarching vision is to expand alternatives to driving, advance the transition to clean-transportation technologies, promote integrated and safe transit networks, and foster transit-oriented development in compact and mixed-use developments (SCAG 2024). In addition, Connect SoCal is supported by a combination of transportation and land use strategies that outline how the region can achieve California's GHG emission-reduction goals and federal Clean Air Act requirements. The projected regional development, when integrated with the proposed regional transportation network in Connect SoCal, would reduce per-capita

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GHG emissions related to vehicular travel and achieve the GHG reduction per-capita targets for the SCAG region.

The Connect SoCal Plan does not require that local general plans, specific plans, or zoning be consistent with the SCS, but provides incentives for consistency to governments and developers. As mentioned in the traffic study, the project site is within a TPA and the project vicinity is served by multiple transit services with headways under 20 minutes, which would help reduce transportation-related GHG emissions. Therefore, the proposed project would satisfy the City's screening criteria type (1) transit priority areas screening and would be presumed to have a less-than-significant impact with regard to VMT per the City's guidelines (Appendix B). The proposed project would not interfere with SCAG's ability to implement the regional strategies outlined in the Connect SoCal Plan, and impacts would be less than significant.

Mitigation Program

No mitigation is required.

3.9 HAZARDS AND HAZARDOUS MATERIALS

Would the project:

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

Less Than Significant Impact. The term "hazardous material" can be defined in different ways. For purposes of this environmental document, the definition of "hazardous material" is the one outlined in the California Health and Safety Code, Section 25501:

Hazardous materials that, because of their quantity, concentration, or physical or chemical characteristics, pose a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the unified program agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

"Hazardous waste" is a subset of hazardous materials, and the definition is essentially the same as in the California Health and Safety Code, Section 25117, and in the California Code of Regulations, Title 22, Section 66261.2:

Hazardous wastes are those that, because of their quantity, concentration, or physical, chemical, or infectious characteristics, may either cause, or significantly contribute to an increase in mortality or an increase in serious illness, or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

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Hazardous materials can be categorized as hazardous nonradioactive chemical materials, radioactive materials, and biohazardous materials (infectious agents such as microorganisms, bacteria, molds, parasites, viruses, and medical waste).

Exposure of the public or the environment to hazardous materials could occur through, but not limited to, the following means: improper handling or use of hazardous materials or waste, particularly by untrained personnel; transportation accident; environmentally unsound disposal methods; and/or fire, explosion, or other emergencies. The severity of potential effects varies with the activity conducted, the concentration and type of hazardous material or wastes present, and the proximity of sensitive receptors.

The project site is currently developed with a hotel that is operational, and all changes are interior and have already occurred. As a result, the proposed project is a request to permit and retain the previously completed work and does not involve any new construction or ground-disturbing activities that would require the transport, use, or disposal of hazardous materials, such as fuels, solvents, or other chemicals commonly associated with construction. Therefore, no impact would occur.

During operation, 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. Compliance with applicable laws and regulations governing the use, storage, transportation, and disposal of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts.

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 (AFR 2012). Therefore, substantial hazards to the public or the environment arising from the routine use, storage, transport, and disposal of hazardous materials during long-term operation of the proposed project are not projected to occur. Impacts would be less than significant, and no mitigation is required.

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

No Impact. The project site is currently developed with a hotel that is operational, and all changes are interior and have already occurred. As a result, the proposed project is a request to permit and retain the previously completed work and does not involve any new construction or physical modifications that could result in the accidental release of hazardous materials, such as spills or leaks from equipment, fuel storage, or soil disturbance in contaminated areas. Since no ground-disturbing activities or handling of hazardous substances would occur, there is no potential for construction-related hazardous material impacts.

It is unlikely that operation of the proposed project would cause the release of hazardous materials into the environment. However, while highly unlikely due to the proposed use, in the event of a hazardous materials spill of greater amount or toxicity than on-site personnel could safely contain and clean up, assistance would

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be requested from the Anaheim Fire and Rescue hazmat team. Therefore, no impact would occur, and no mitigation is required.

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

No Impact. The Ponderosa Elementary School and Parkview Elementary School are equidistant to the proposed project site, approximately 0.75 mile south and southeast of the project site. As described previously, the project operation would not emit hazardous substances or hazardous wastes in quantities posing substantial hazards to the public or the environment. Additionally, all changes associated with the proposed project are interior and have already occurred and no ground-disturbing or new construction activities would occur under the proposed project. Therefore, construction related hazardous materials would not be present or handled. Further, the use, storage, transport, and disposal of hazardous materials during the proposed project's operation would be required to conform to existing laws and regulations. Therefore, no impact would occur, and no mitigation is required.

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?

No Impact. According to the California Department of Toxic Substances Control (DTSC) EnviroStor database, the project site is not on a federal superfund site, State response site, voluntary cleanup site, school cleanup site, corrective action site, or tiered permit site (DTSC 2025). Six sites were identified within 1 mile of the project site, including:

- Anaheim Lewis Street, located approximately 1 mile from the project site
- Heritage School, located approximately 0.72 mile from the project site
- Ponderosa Elementary School, located approximately 0.72 mile from the project site
- Paul Revere Elementary School Expansion, located approximately 0.65 mile from the project site
- Silgan Plastics Corporation, located approximately 0.89 mile from the project site

Due to the site's regulated nature, none of the sites found to represent an environmental concern to the project. Review of the State Water Resources Control Board (SWRCB) Geo Tracker database confirms that the project site is not on a Leaking Underground Storage Tank (LUST) Cleanup site (SWRCB 2025). There are 26 LUST sites within 0.50 miles of the project site; however, 21 of those sites are beyond the 0.25-mile radius and do not appear to represent an environmental concern to the project site. There are 19 sites that have been completed and classified as "case-closed." One site has a status of open but inactive, and the other site is open and undergoing remediation. The five sites within the 0.25-mile radius have been completed and classified as "case-closed" (SWRCB 2025).

The project site is not on a list of solid waste disposal sites identified by the SWRCB with waste constituents above hazardous waste levels outside the waste management unit or active cease and desist orders and cleanup and abatement orders (CalEPA 2025a). All use, storage, transport, and disposal of hazardous materials (including any small amounts of hazardous wastes) during operational activities will be performed in

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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), no impacts related to this topic would occur (CalEPA 2025a, 2025b). Therefore, no impact would occur, and no mitigation is required.

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

No Impact. The airport closest to the project site is the Fullerton Municipal Airport, approximately 6 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. Therefore, no impact would occur, and no mitigation is required.

- f) 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, which establishes a comprehensive framework of policy and guidance for emergency and disaster response operations (Anaheim 2017a). 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 in the Anaheim Hills area and would not impede the flow of traffic on nearby major streets or highways.

All changes associated with the proposed project are interior and have already occurred. As a result, the proposed project is a request to permit and retain the previously completed work and would not involve any new construction activities and would not require staging equipment or the use of construction vehicles. As a result, the project would not generate traffic queuing on nearby streets or impact roadway operations. Additionally, the project would not introduce any permanent changes to public or private roadways that could physically impair or otherwise conflict with the City's Emergency Operations Plan or any other adopted emergency response or evacuation plan. Further, the proposed project would not permanently obstruct or alter any transportation routes that could be used as evacuation routes during emergency events. Therefore, potential impacts related to emergency response and evacuation plans during operation would be less than significant and no mitigation is required.

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

Less Than Significant Impact. The project site is 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), the project site is not located in a fire hazard area (CAL FIRE 2024). 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 and no mitigation is required.

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Mitigation Program

No mitigation is required.

3.10 HYDROLOGY AND WATER QUALITY

Would the project:

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

Less Than Significant With Mitigation Incorporated. All changes associated with the proposed project are interior and have already occurred and no ground-disturbing or new construction activities would occur under the proposed project. Therefore, the proposed project does not involve any construction, excavation, or other ground-disturbing activities that could contribute to sedimentation, erosion, or pollutant discharges into surface or groundwater resources. Additionally, the project does not include the use, storage, or disposal of hazardous materials or chemicals that could pose a risk to water quality. Because the project does not increase stormwater runoff, or other potential discharges, it would not require compliance with a National Pollutant Discharge Elimination System (NPDES) permit or Waste Discharge Requirements (WDRs) under the jurisdiction of the Regional Water Quality Control Board (RWQCB). Furthermore, the project does not involve alterations to drainage patterns or hydrologic conditions that could result in adverse water quality impacts.

Under Section 303(d) of the Clean Water Act, water bodies with impaired water quality are subject to Total Maximum Daily Load (TMDL) regulations, which limit pollutant loads to improve water quality. However, since the proposed project does not increase discharges to receiving waters or changes to existing land uses that could contribute pollutants, it would not conflict with any established TMDLs or water quality control plans. Given these factors, the project would not violate any water quality standards, conflict with applicable waste discharge requirements, or otherwise degrade surface or groundwater quality. However, mitigation measure MM 5.8-3 from MMP 85C as included within EIR No. 340 would be applicable to the proposed project. MM 5.8-3 is related to ongoing property maintenance during operations of the Wyndham Hotel and is renumbered in this IS/MND as mitigation measure MM 3.10-1.

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

No Impact. All changes associated with the proposed project are interior and have already occurred. As a result, the proposed project is a request to permit and retain the previously completed work and would not involve construction, ground disturbance, or any activities that would extract groundwater or alter existing groundwater recharge conditions. The project includes a minimal increase in water use beyond existing conditions and does not involve new impervious surfaces that could interfere with natural groundwater infiltration.

The project site is in the Orange County Groundwater Basin, which is managed by the Orange County Water District (OCWD). OCWD implements sustainable groundwater management practices, including recharge

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programs that use stormwater capture, imported water, and recycled water to replenish the basin. Since the proposed project would introduce minimal new water demands or would not modify existing recharge areas, it would not impact OCWD's ability to manage groundwater resources sustainably.

Furthermore, the project does not involve dewatering activities, installation of new wells, or any operational components that would draw from or deplete groundwater supplies. It also does not include paving or coverage of pervious surfaces that would reduce infiltration capacity. Given these factors, the project would not substantially decrease groundwater supplies or interfere with groundwater recharge. Therefore, no impact would occur, and no mitigation is required.

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

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

No Impact. All changes associated with the proposed project are interior and have already occurred and the proposed project does not involve any construction, grading, excavation, or ground-disturbing activities that could modify the existing drainage pattern of the site or surrounding area. The project does not include alterations to the course of a stream or river, nor does it introduce new impervious surfaces that could affect stormwater infiltration or runoff patterns.

The project would not alter the existing drainage pattern of the site or introduce changes that could increase the potential for erosion or siltation. Since no grading, soil disturbance, or modifications to drainage features would occur, the project would not result in conditions that could cause or contribute to substantial erosion or siltation on- or off-site. No impact would occur, 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 off-site?

No Impact. The project does not include any modifications that would increase impervious surface coverage, alter runoff rates, or concentrate stormwater flows. Without changes to existing drainage conditions, the project would not increase the rate or amount of surface runoff in a manner that could result in flooding on- or off-site. No impact would occur, and no mitigation is required.

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

No Impact. The project does not involve the creation of new stormwater flows, nor does it alter the capacity or function of existing drainage infrastructure. Since no additional runoff or pollutant sources would be introduced, the project would not exceed the capacity of existing or planned stormwater drainage systems or generate substantial additional sources of polluted runoff. No impact would occur, and no mitigation is required.

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iv) Impede or redirect flood flows?

No Impact. The project site is not in a Federal Emergency Management Agency (FEMA)-designated 100-year floodplain. According to the FEMA Flood Insurance Rate Map (FIRM) No. 06059C01417J, the project site is in Zone X (FEMA 2023). 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, there would be no impacts related to impeding or redirecting of flood flows.

The project does not include any structures, fill, or modifications to flood-prone areas that could impede or redirect flood flows. There are no changes to the site's hydrology that would affect flood risks in the area. No impact would occur, and no mitigation is required.

d) In flood hazard, tsunami, or seiche zones, 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 feet in height, causing great devastation to near-shore structures. The project site is 10.8 miles from the Pacific Ocean shoreline. According to the Department of Conservation Orange County Tsunami Hazard Areas Map, the project site is outside of the tsunami hazard area (DOC 2022b). Therefore, the project site would not be subject to inundation from tsunamis, and there would be no risk of release of pollutants due to inundation from a 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 1.13 miles southwest 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 previously, the project site is in 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 previously discussed in Section 3.9, Hazards and Hazardous Materials, hazardous substances associated with routine maintenance of the property 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 near the project site and as discussed previously, there are no water bodies within the vicinity of the project site that would pose a risk of flooding. Therefore, there would be no impacts related to the release of pollutants in the event of inundation from flooding. No mitigation is required, and no mitigation is required.

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

No 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) in 1995 (last updated in March 2021) 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 (Santa Ana RWQCB 2025).

As discussed previously, the project would not involve any ground disturbance, grading, or excavation activities that could result in soil erosion, sedimentation, or the release of construction-related pollutants into stormwater runoff. Additionally, the project would not introduce new sources of pollutants such as chemicals, petroleum products, or construction materials that could impact surface or groundwater quality.

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 within the Coastal Plain of Orange County Groundwater Basin, which is managed by OCWD (DWR 2018). The Coastal Plain of Orange County Groundwater Basin is identified by the Department of Water Resources (DWR) as a 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* to the California DWR as an alternative to a Groundwater Sustainability Plan (OCWD 2017). 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 previously, 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; 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.

Mitigation Program

The following mitigation measure from MMP 85C would be applicable to the proposed project as included within EIR No. 340:

MM 3.10-1 Ongoing during project operations, the property owner/developer shall provide for the following: cleaning of all paved areas not maintained by the City of Anaheim on a monthly basis, including, but not limited to, private streets and parking lots. The use of water to clean streets, paved areas, parking lots, and other areas and flushing the debris and sediment down the storm drains shall be prohibited (ARSP EIR 340 MM 5.8-3).

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3.11 LAND USE AND PLANNING

Would the project:

a) Physically divide an established community?

No Impact. The proposed project consists of APN 082-271-05 and is approximately 0.97 acres. The project site is primarily surrounded by a mixture of commercial and commercial recreation uses. The project site is currently developed with a hotel that is operational, and all changes are interior and have already occurred. The proposed project 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 impact would occur and no mitigation is required.

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

Less Than Significant Impact. The proposed project involves an increase in the number of hotel rooms, from 78 rooms to 106 rooms, adding 1 caretaker unit, and changes to 6,394 SF of accessory uses at the already existing hotel with no changes to the footprint of the building and remainder of the site. The project site is currently developed with a hotel that is operational, and all changes are interior and have already occurred. Project implementation would require a GPA and SPA to the ARSP. The project site is designated as Low-Medium Density, which allows up to 75 rooms per gross acre or 75 rooms per lot or parcel, whichever is greater. The proposed project would include a GPA from Low-Medium Density (up to 75 rooms per gross acre or 75 rooms per lot of parcel) to a new density category Medium Density (Modified B) for up to 107 hotel rooms and 6,394 SF of accessory uses. The parcels surrounding the project site are zoned as The Anaheim Resort Specific Plan within the C-R District and The Disneyland Resort Specific Plan within the Parking District and District A (Commercial Recreation Uses) (Anaheim 2022, 2024a). As such, the proposed GPA and SPA would be consistent with the existing surrounding land uses, and with approval of these changes, the proposed project would not conflict with any applicable land use plan, policy, or regulation. Impacts are therefore considered less than significant, and no mitigation is required.

Mitigation Program

No mitigation is required.

3.12 MINERAL RESOURCES

Would the project:

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

No Impact. According to the General Plan Final EIR, mineral resources are in parts of East Anaheim, Anaheim Canyon, and the City's Hill and Canyon Areas (Anaheim 2004c). These are identified as being within Mineral Resource Zone, Class 2 (MRZ-2). Lands within this zone are determined to have a high potential for

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significant mineral deposits. The project site is in the northern portion of the city and is not in either of these zones; therefore, project implementation would not affect any known mineral deposits. Additionally, the project site is currently developed with a hotel that is operational, and all changes are interior and have already occurred. Therefore, project implementation would not result in the loss of availability of known mineral resources. No impact would occur, and no mitigation is required.

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

No Impact. The site currently exists as a hotel. The proposed project involves increasing the number of hotel rooms from 78 to 106 rooms, adding 1 caretaker unit, and modifying approximately 6,394 square feet of accessory uses within the existing hotel structure. No expansion of the building footprint or changes to the remainder of the site are proposed. The entire project is zoned for commercial recreation use. These designations and zoning do not permit mineral extraction. Furthermore, the project site is an urbanized area and does not support mineral extraction operations. Therefore, there would be no loss of a known mineral resource with project implementation. No impact would occur, and no mitigation is required.

Mitigation Program

No mitigation is required.

3.13 NOISE

Noise is defined as unwanted sound and, when overexposed, is known to have adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Based on these known adverse effects of noise, federal, state, and local governments have established criteria to protect public health and safety and to prevent the disruption of certain human activities, communication, or sleep. Noise modeling was prepared by PlaceWorks in June 2025, which is summarized herein and included as Appendix C. Additional information on noise and vibration fundamentals are contained in Appendix C.

The noise environment in the vicinity of the project site is primarily influenced by traffic noise from West Katella Avenue, Harbor Boulevard, and I-5. Existing commercial, theme park, and hotel activities in the project area also contribute to the existing noise environment. Based on the City of Anaheim General Plan Focused Update Draft Program Environmental Impact Report (PEIR), Chapter 5, Noise and Vibration, Figure 5.11-4, *Future Traffic Noise Contours – Section A*, the project site is within the 65 A-weighted decibel (dBA) community noise equivalent level (CNEL) traffic noise contour of West Katella Avenue (Anaheim 2024b).

Certain land uses are particularly sensitive to noise and vibration. The City of Anaheim's General Plan Noise Element identifies residential uses (e.g., single-family and multifamily, duplex, mobile homes), hospitals, school classrooms, school playgrounds, and parks as noise sensitive. There are sensitive receptors, including hotel outdoor activity area uses to the north, east, west, and south of the project site.

Would the project result in:

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

Less Than Significant With Mitigation Incorporated. As previously stated, the proposed project would not expand the building footprint or result in other site improvements. All construction-related activities were conducted within the existing building's envelope and did not involve heavy-duty construction equipment. As a result, the proposed project is a request to permit and retain the previously completed work and does not involve any exterior construction, grading, excavation, or ground-disturbing activities that would result in noise impacts at adjacent uses associated with the proposed project. Therefore, no impacts related to construction noise would occur.

The proposed project would generate an increase of 320 two-way trips per day with 18 AM peak-hour trips and 24 PM peak-hour trips compared to existing daily trips.⁷ A project will normally have a significant effect on the environment related to traffic noise if it substantially increases the ambient noise levels for adjoining areas. Most people can detect changes in sound levels of approximately 3 dBA under normal, quiet conditions, and changes of 1 to 3 dBA under quiet, controlled conditions. Changes of less than 1 dBA are usually indiscernible. A change of 5 dBA is readily discernible to most people in an outdoor environment. Noise levels above 65 dBA CNEL are normally unacceptable at sensitive receptor locations such as residences, schools, and noise environments in these areas would be considered degraded. Based on this, a significant impact would occur if the addition of project-related traffic trips results in a 3 dBA increase over existing traffic noise levels.

Traffic noise increases are calculated using a version of the Federal Highway Administration (FHWA) RD-77-108 Traffic Noise Prediction Model. The traffic noise prediction model takes into account the following inputs: average daily traffic (ADT) volumes; vehicle mix; speeds; number of lanes; and day, evening, and night traffic splits. Model inputs associated with transportation noise were provided by LLG (2025) (see Appendix C). Traffic noise modeling does not account for existing intervening building facades. Table 3, *Project-Related Increases in Traffic Noise, dBA CNEL at 50 Feet*, shows that the addition of proposed project trips would result in an increase of less than 1 dBA over existing conditions, well under the 3 dBA threshold. However, mitigation measures MM 5.10-6 and MM 5.10-7 from MMP 85C as included within EIR No. 340 would be applicable to the proposed project. These mitigation measures are related to the ongoing implementation of noise reduction measures during project operation and are renumbered in this IS/MND as mitigation measures MM 3.13-1 and MM 3.13-2.

⁷ It should be noted that the Traffic Circulation Analysis included the number of trips for the proposed project and shows that the proposed project (with a hotel equivalent of 118 rooms) generates approximately 943 daily trips, with 54 trips (30 inbound, 24 outbound) produced in the AM peak hour and 70 trips (36 inbound, 34 outbound) produced in the PM peak hour on a "typical" weekday. The Traffic Circulation Analysis based the Level of Service (LOS) analysis on a comparison between the proposed project and the FSP 95-03 entitlement for the project site. FSP 95-03 allows 72 rooms on the project site. The baseline condition for this Initial Study, as described in Section 1.10, *Baseline Conditions*, is 78 rooms. The number of trips for a baseline of 78 rooms was calculated using the same methodology used in the Traffic Circulation Analysis. For 78 rooms, the Wyndham Hotel generates 623 daily trips, with 36 trips (20 inbound, 16 outbound) in the AM peak hour and 46 trips (23 inbound, 23 outbound) in the PM peak hour. This results in a net difference of 320 daily trips (18 AM peak-hour trips and 24 PM peak-hour trips) between the proposed project and baseline conditions.

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Table 3 Project-Related Increases in Traffic Noise, dBA CNEL at 50 Feet

Roadway	Roadway Segment		Traffic Noise Increase in dBA CNEL		
	From	To	Baseline Conditions	Baseline Conditions Plus the Proposed Project	Increase
Katella Avenue	the West	Harbor Boulevard	73	73	<1
Katella Avenue	Harbor Boulevard	Clementine Street	72	72	<1
Katella Avenue	Clementine Street	the East	72	72	<1
Harbor Boulevard	the North	Katella Avenue	69	69	<1
Harbor Boulevard	Katella Avenue	the South	69	69	<1
Clementine Street	the North	Katella Avenue	63	63	<1
Clementine Street	Katella Avenue	the South	62	62	<1

Source: LLG 2025 (included as Appendix C).

Note that the Traffic Circulation Analysis includes four scenarios: Existing Conditions no Project; Existing Conditions plus Project; GP Buildout no Project; GP Buildout plus Project. The GP Buildout no Project corresponds to the baseline condition in this Initial Study. The GP Buildout plus Project corresponds to the comparison between the baseline condition for this Initial Study and the proposed project.

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

No Impact. As previously stated, the proposed project would not expand the building footprint or result in other site improvements and no new construction activities would be conducted. The proposed project does not involve any exterior construction, grading, excavation, or ground-disturbing activities that would result in vibration impacts at adjacent uses associated with the project. Therefore, no impacts related to vibration would occur and no mitigation is required.

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

No Impact. The nearest airport to the project site is approximately 6 miles southeast of Fullerton Municipal Airport. The project site is outside of 60 dBA CNEL noise contour for Fullerton Municipal Airport. Therefore, implementation of the proposed project would not result in increased exposure of people working at or visiting the project site to aircraft noise. No impact would occur, and no mitigation is required.

Mitigation Program

The following mitigation measures from MMP 85C would be applicable to the proposed project as they are included within EIR No. 340:

MM 3.13-1 Ongoing during construction and project operation, pressure washing operations for purposes of building repair and maintenance due to graffiti or other aesthetical considerations shall be limited to daytime hours of operation between 7:00 AM and 8:00 PM (ARSP EIR 340 MM 5.10-6).

MM 3.13-2 Ongoing during construction and project operation, sweeping operations in the parking facilities and private on-site roadways shall be performed utilizing sweeping/scrubbing

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equipment which operate at a level measured not greater than 60 dBA at the nearest adjacent property line (ARSP EIR 340 MM 5.10-7).

3.14 POPULATION AND HOUSING

Would the project:

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

No Impact. The proposed project involves increasing the number of hotel rooms from 78 to 106, adding 1 caretaker unit, and modifying approximately 6,394 SF of accessory uses within the existing hotel structure. No expansion of the building footprint or changes to the remainder of the site are proposed. The project does not include the construction of new housing or permanent employment-generating businesses, nor does it involve the extension of roads or other infrastructure into previously undeveloped areas. As such, the project would not directly or indirectly induce substantial unplanned population growth. The project would accommodate temporary visitors and would not result in long-term increases in the local population. Therefore, no impact related to unplanned population growth would occur and no mitigation is required.

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

No Impact. The site currently exists as a hotel. There are no existing people or homes on site. The project will not cause the displacement of a substantial number of people or houses. Therefore, no impact would occur, and no mitigation is required.

Mitigation Program

No mitigation is required.

3.15 PUBLIC SERVICES

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

- a) **Fire protection?**

Less Than Significant With Mitigation Incorporated. Anaheim Fire & Rescue provides fire protection services to the project site. Anaheim Fire & Rescue is a full-service organization designed to provide essential public safety and emergency services to the community and its visitors. Fire stations are strategically located in the City of Anaheim to ensure an efficient response to all risk hazards and to maintain recommendations for response times. The project site is currently served by Anaheim Fire & Rescue via existing infrastructure. The

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nearest station is Fire Station 3 located at 1717 South Clementine Street, 0.4 miles east of the project site. Emergency access to the project site would be via Katella Avenue and Harbor Boulevard.

The proposed project does not involve any new construction. The project site is currently developed with a hotel that is operational, and all changes are interior and have already occurred. The proposed project would marginally increase the number of hotel guests and would not change the type of uses in the hotel. The property owner would also enter into an agreement with the City of Anaheim to pay their fair share per the City's Fire Protection Facilities and Paramedic Services Impact Fee Program as detailed in mitigation measure MM 5.12-9 from MMP 85C (renumbered in this IS/MND as mitigation measures MM 3.15-1). The fair share payment would be based on the increase in rooms and applied when the property owner submits and receives approval of the building permit for the unpermitted modifications to hotel rooms and accessory spaces. Therefore, impacts would be less than significant with mitigation incorporated.

b) Police protection?

Less Than Significant Impact. The Anaheim Police Department provides law enforcement and crime prevention services to the project site. Officers operate out of four stations and patrol an area of 49.7 square miles, divided into four districts: West, Central, South, and East. The Anaheim Police Department currently employs approximately 386 sworn officers and a support staff of over 170. The ratio of sworn police officers is approximately 2.59 officers per 1,000 population. Police services provided include patrol, investigations, traffic enforcement, traffic control, vice and narcotics enforcement, airborne patrol, crime suppression, community policing, tourist-oriented policing, and detention facilities. The proposed project would marginally increase the number of hotel guests on the project, would not change the type of uses in the hotel, and therefore would not generate demand for additional police staffing. However, in the future, if additional police staff are needed to serve the proposed project, funding for any new personnel needed to maintain acceptable service levels would come from the City of Anaheim's General Fund. Property taxes and other fees assessed for the proposed project would contribute to the General Fund revenues.

The project site is served by the Anaheim Police Department. The nearest police station to the project site is located at 425 South Harbor Boulevard, two miles north of the project site. The project site is currently developed with a hotel that is operational, and all changes are interior and have already occurred. The proposed project would marginally increase the number of hotel guests and would not change the type of uses in the hotel. The proposed project does not involve new construction and therefore is not expected to adversely affect the Anaheim Police Department's ability to provide adequate service and/or require new or expanded police facilities that could result in adverse environmental impacts. Therefore, impacts would be less than significant, and no mitigation is required.

c) Schools?

No Impact. Anaheim Elementary School District and Anaheim Union High School District serve the project area. However, the increase in student generation and the need for new or expanded existing school facilities is tied to population growth. No residential development is proposed under the proposed project. Additionally, the need for additional school services and facilities is addressed by compliance with school impact assessment fees per SB 50, also known as Proposition 1A. SB 50—codified in California Government Code Section

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65995—enacted in 1988 to address how schools are financed and how development projects may be assessed for associated school impacts. The proposed project would be required to pay the current development impact fees for residential and commercial space. Payment of the fees would satisfy the requirements of AB 2926 and SB 50 to offset impacts to school services. Therefore, no impact would occur, and no mitigation is required.

d) Parks?

Less Than Significant Impact. See response to Section 3.16.a. As substantiated in this section, impacts would be less than significant, and no mitigation is required.

e) Other public facilities?

No Impact. The need for new or expanded library services and facilities is tied to population growth. No residential development is proposed under the proposed project, and project development is not expected to generate a need for new or additional library services or facilities. Therefore, no impact to libraries would occur and no mitigation is required.

Mitigation Program

The following mitigation measure from MMP 85C would be applicable to the proposed project as included within EIR No. 340:

MM 3.15-1 Prior to issuance of the first building permit, the property owner/developer shall enter into an agreement recorded against the property with the City of Anaheim to pay or cause to be paid their fair share of the funding to accommodate the following, which will serve the Anaheim Resort Specific Plan area:

- a. One additional fire truck company.
- b. One additional paramedic company.
- c. Modifications to existing fire stations to accommodate the additional fire units, additional manpower, equipment and facilities.
- d. A vehicle equipped with specialty tools and equipment to enable the Fire Department to provide heavy search and rescue response capability.
- e. A medical triage vehicle/trailer, equipped with sufficient trauma dressings, medical supplies, stretchers, etc., to handle 1,000 injured persons, and an appropriate storage facility.

The determination of the allocable share of costs attributable to the property owner/developer shall be based on an apportionment of the costs of such equipment/facilities among property owners/developers in the Hotel Circle Specific Plan Area, the Disneyland Resort Specific Plan Area and the Anaheim Resort Specific Plan Area or the otherwise defined service area, as applicable, depending on the area served.

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Note: To implement this mitigation measure, the City has adopted the Fire Protection Facilities and Paramedic Services Impact Fee Program. Compliance with this Program by the property owner/developer (per Ordinance No. 5496 and Resolution No. 95R-73 dated May 16, 1995) shall satisfy the requirements of this Mitigation Measure, or the City may enter into alternative financing arrangements (ARSP EIR 340 MM 5.12-9).

3.16 RECREATION

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

Less Than Significant Impact. The proposed project involves an increase in the number of hotel rooms from 78 to 106, adding 1 caretaker unit, and modifications to approximately 6,394 SF of accessory uses at an existing hotel. Any increase in park use would be minimal. While hotel guests may utilize recreational facilities during their stay, their use is typically temporary and dispersed and not expected to place substantial additional demand on these facilities. Therefore, the project would not result in or accelerate substantial physical deterioration of parks or recreational resources. Impacts would be less than significant and no mitigation would be required.

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

No Impact. The project does not propose new or expanded recreational facilities. It involves internal modifications to an existing hotel, including an increase in rooms and accessory uses, with no change to the building footprint. As such, there would be no physical environmental impacts related to recreational facilities. Therefore, no impact would occur, and no mitigation is required.

Mitigation Program

No mitigation is required.

3.17 TRANSPORTATION

The impact analysis in this section is based on the results of the Traffic Circulation Analysis prepared by Linscott, Law & Greenspan Engineers for the proposed project, included as Appendix B.

Would the project:

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

Less Than Significant With Mitigation Incorporated. The proposed project would not involve any construction or physical alterations to the existing building or surrounding site. The project site is currently developed with a hotel that is operational, and all changes are interior and have already occurred. No changes

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to site access, driveways, or the public right-of-way are proposed, and no modifications to existing transit stops, bicycle routes, or pedestrian facilities would occur.

Project Consistency with Transportation Plans, Ordinances, and Programs

The proposed project would not conflict with a program, plan, ordinance, or policy if it were generally consistent with, and would not obstruct implementation of that program, plan, ordinance, or policy. The following programs, plans, policies, and ordinances were reviewed for consistency:

- Orange County Master Plan of Arterial Highways
- Orange County Congestion Management Program
- General Plan Circulation Element
- Bicycle Master Plan

Orange County Master Plan of Arterial Highways

The Master Plan of Arterial Highways (MPAH), administered by OCTA, guides the development of Orange County's arterial roadway network and is tied to eligibility for transportation funding. The City's current arterial street classifications are consistent with the MPAH. The proposed project does not propose changes to the roadway network or MPAH classifications. As such, the proposed project would not conflict with the MPAH and remains consistent with regional transportation planning efforts (OCTA 2025).

Orange County Congestion Management Program

The 2023 Orange County Congestion Management Program (CMP) Report (OCTA 2023) aims to maintain LOS E or better at key intersections using the intersection capacity utilization methodology. The Transportation Circulation Analysis analyzed LOS for two key study intersections, Harbor Boulevard at Katella Avenue and Clementine Street at Katella Avenue. Both intersections currently operate at an acceptable LOS B or better during the AM and PM peak hours. Only the Harbor Boulevard at Katella Avenue is an intersection included in the CMP. The implementation of the proposed project would not cause an operational deficiency at this intersection when compared to the LOS standard defined in the CMP. Therefore, the proposed project would not conflict with the CMP (see Appendix B).

General Plan Circulation Element

The City's General Plan Circulation Element (updated and adopted May 2025) establishes the framework for a balanced, multi-modal transportation system that supports planned land uses. According to the City's Circulation Element and stated in the City of Anaheim Criteria for Preparation of Traffic Impact Studies, LOS D is the established threshold that should be maintained during the morning and evening peak commute hours on all City intersections. The arterial roadway criteria for the City of Anaheim involves the use of average daily traffic (ADT) volume-to-capacity (V/C) ratios. LOS C (V/C not to exceed 0.80) is the performance standard that has been adopted for the project area's circulation system by the City of Anaheim.

The proposed project does not propose changes to designated roadway classifications. Furthermore, as shown in Appendix B, the proposed project would not cause an operational deficiency at the two key study intersections when compared to the LOS standards in the General Plan Circulation Element. The project's

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Transportation Circulation Analysis also analyzed LOS at one key roadway segment: Katella Avenue between Harbor Boulevard and Clementine Street. The proposed project would not cause an operational deficiency at the key roadway segment when compared to the City's LOS standards. Although the roadway segment of Katella Avenue, between Harbor Boulevard and Clementine Street, is forecast to operate at an unacceptable LOS D, the proposed project is expected to add less than the allowable thresholds to the V/C value.

The property owner would also pay the appropriate Traffic Signal Assessment Fees and Transportation Impact and Improvement Fees to the City of Anaheim as detailed in mitigation measure MM 5.14-2 from MMP 85C (renumbered in this IS/MND as mitigation measures MM 3.17-1). The fees would be based on the increase in rooms and applied when the property owner submits and receives approval of the building permit for the unpermitted modifications to hotel rooms and accessory spaces. Therefore, impacts would be less than significant with mitigation incorporated.

Bicycle Master Plan

The City's Bicycle Master Plan is a 20-year plan to close gaps in the existing bicycle network, provide new bicycle connections between key points, and maximize implementation of new bicycle lanes. It is included in the General Plan Circulation Element as Appendix B and the plan is summarized in the Existing and Planned Bicycle Facilities Map, provided therein as Figure C-5. There is a proposed Class 1 bike lane to the north of the project site along Disney Way that would travel east of I-5 and an existing Class 2 bike lane south of the project site on Orangewood Avenue (Anaheim 2025a). The proposed project would not impact the existing bike lanes nor impact the ability to install the proposed Class 1 bike lane along Disney Way.

Active Transportation and Public Transit

Pedestrian facilities, including sidewalks, crosswalks, and pedestrian push buttons and indications at signalized intersections, are available in the vicinity of the project site. There is an existing sidewalk on the south end of the project site. The project site is near various alternative transportation modes and routes, including transit stops and pedestrian facilities consistent with the goals and policies of the City of Anaheim General Plan Green Element (revised June 2018), including Goal 5.1 to "Promote bus service and paratransit improvements" and Goal 8.1 to "Protect and encourage pedestrian travel." Existing transit service in the vicinity of the project site is provided by the OCTA and ART. There are multiple OCTA stops within 0.25 mile of the project site that provide access to Routes 543, 43, 50, and 83. Route 543 is a BRAVO route and runs north to south along Harbor Boulevard from the Fullerton Transportation Center to Costa Mesa. Route 43 is a Local Fixed Route and runs north to south along Harbor Boulevard from Fullerton to Costa Mesa. Route 50 provides service from Long Beach to Orange via Katella Avenue. Route 83 is also a Local Fixed Route and runs from Fullerton to Laguna Hills with stops along Katella Avenue near the project site (OCTA 2025).

ART is a fixed-route transportation system that provides service through a network of 20 routes for residents, employees, and guests of the city and the greater Anaheim Resort area. The Disney Way Line, Clementine Line, and Hotel Line (Routes 6, 7, and 8) are the closest routes to the project site, with Routes 7 and 8 stopping directly in front of the project site. This route provides service along Manchester Avenue, Katella Avenue, Harbor Boulevard, Disney Way, Clementine Street, Zeyn Street, and Anaheim Boulevard. This route includes stops at the Disneyland Resort Main Transportation Center, and Anaheim GardenWalk (ART 2025). The

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proposed project is limited to on-site improvements with no off-site improvements along the street frontage and would not cause any changes to existing services. Therefore, no impacts to alternative modes of transportation are anticipated and no mitigation is required.

b) Conflict with or be inconsistent with CEQA Guidelines Section 15064.3(b)?

Less Than Significant With Mitigation Incorporated. CEQA Guidelines Section 15064.3(b) codifies that project-related transportation impacts are typically best measured by evaluating the project's VMT. The City of Anaheim adopted its *Traffic Impact Analysis Guidelines* (TIA Guidelines) in 2020 (updated in 2025), which include screening criteria for various project types that may be exempt from detailed analysis because they are presumed to have a less-than-significant impact (Anaheim 2025b). 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. The proposed project would fall under Type 1: transit priority areas screening.

The requested General Plan and Specific Plan amendments are intended to reconcile the discrepancy between the previously approved and existing number of rooms on-site. Because the proposed project does not involve new development or an intensification beyond the existing use and given its modest scale (a net increase of 29 rooms and internal accessory use area), it would result in a minimal increase in VMT. Furthermore, the project qualifies for VMT screening as a Type 1 project under the City's guidelines. However, mitigation measure MM 5.14-8 from MMP 85C as included within EIR No. 340 would be applicable to the proposed project. MM 5.14-8 is related to ongoing Transportation Demand Management measures implemented during operations of the Wyndham Hotel and is renumbered in this IS/MND as mitigation measure MM 3.17-2.

c) 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. The project would not modify any on-site circulation or access features, nor would it involve construction of new driveways or roadways. All existing access points, internal circulation routes, and site configurations would remain unchanged. The hotel use is compatible with surrounding urban development and would not introduce incompatible vehicles or equipment. Therefore, the project would not increase hazards related to design or use incompatibility. Therefore, no impact would occur, and no mitigation is required.

d) Result in inadequate emergency access?

Less Than Significant Impact. Emergency access to the hotel site would remain unchanged. All changes associated with the proposed project are interior and have already occurred. As a result, the proposed project is a request to permit and retain the previously completed work and no construction is proposed that would restrict or alter emergency vehicle routes. The existing fire lanes, access aisles, and hydrants would continue to meet the requirements of the Anaheim Fire & Rescue Department. As such, the project would not result in inadequate emergency access. Therefore, no impact would occur, and no mitigation is required.

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Mitigation Program

The following mitigation measures from MMP 85C would be applicable to the proposed project as they are included within EIR No. 340:

- MM 3.17-1** Prior to issuance of the first building permit for each building, the property owner/developer shall pay the appropriate Traffic Signal Assessment Fees and Transportation Impact and Improvement Fees to the City of Anaheim in amounts determined by the City Council Resolution in effect at the time of issuance of the building permit with credit given for City-authorized improvements provided by the property owner/developer. The property owner shall also participate in all applicable reimbursement or benefit districts, which have been established (ARSP EIR 340 MM 5.14-2).
- MM 3.17-2** Prior to the final building and zoning inspection, the property owner shall record a covenant on the property requiring that ongoing during project implementation, the property owner/developer shall implement and administer a comprehensive Transportation Demand Management (TDM) program for all employees. The form of the covenant shall be approved by the City Attorney's Office. Objectives of the TDM program shall be:
- a. Increase ridesharing and use of alternative transportation modes by guests.
 - b. Provide a menu of commute alternatives for employees to reduce project generated trips.
 - c. Conduct an annual commuter survey to ascertain trip generation, trip origin, and Average Vehicle Ridership (ARSP EIR 340 MM 5.14-8).

3.18 TRIBAL CULTURAL RESOURCES

- a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, or 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).

No Impact. The project site does not contain tribal cultural resources that are identified on any state or local historic registers or sources, including the National Register of Historic Places, the California Register of Historic Resources, the California Built Environment Resources Directory, the California Historical Landmarks, and the California Points of Historical Interest. Therefore, no impact to historical resources would occur and no mitigation is required.

- ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Public Resources Code Section

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5024.1(c). In applying the criteria set forth in Public Resource Code Section 5024.1(c), the lead agency shall consider the significance of the resource to a California Native American tribe.

No Impact. Conducting consultation early in the CEQA process allows tribal governments, public lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. The intent of the consultations is to provide an opportunity for interested Native American contacts to work together with the lead agency (in this case, the City of Anaheim) during the project planning process to identify and protect tribal cultural resources.

As part of the Assembly Bill (AB) 52 and Senate Bill (SB) 18 process, Native American tribes must submit a written request to the relevant lead agency if it wishes to be notified of projects that require CEQA public noticing and are within its traditionally and culturally affiliated geographical area. The lead agency must provide written, formal notification to the tribes that have requested it within 14 days of determining that a project application is complete or deciding to undertake a project. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. Consultation concludes when either (1) the parties agree to mitigation measures to avoid a significant effect, if one exists, on a tribal cultural resource, or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. AB 52 and SB 18 also address confidentiality during tribal consultation per Public Resources Code Section 21082.3(c).

In accordance with the provisions of AB 52 and SB 18, the City sent formal notification letters on May 8, 2025, to the tribes (see Appendix D).

- Cahuilla Band of Indians
- Gabrieleno Band of Mission Indians - Kizh Nation
- Gabrieleno/Tongva San Gabriel Band of Mission Indians
- Gabrielino Tongva Indians of California Tribal Council
- Gabrielino/Tongva Nation
- Gabrielino-Tongva Tribe
- Juaneño Band of Mission Indians Acjachemen Nation – Belardes
- Juaneño Band of Mission Indians Acjachemen Nation 84A
- Pala Band of Mission Indians
- Santa Rosa Band of Cahuilla Indians
- Soboba Band of Luiseno Indians

The City received three responses. On June 13, 2025, the Gabrieleno Band of Mission Indians - Kizh Nation tribe sent a letter responding to the City and requested consultation. The City followed up with the tribe on June 13, 2025, noting that the project does not involve any ground disturbing activities. The Gabrieleno Band of Mission Indians - Kizh Nation's tribal representative responded on June 16, 2025, stating that consultation would not be needed and that the tribe wants to be notified if any type of ground disturbances occurs in the future. On July 2, 2025, the Pala Band of Mission Indians responded in two separate letters for AB52 and SB18.

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The tribe responded stating that they confirmed the proposed project is not within the boundaries of the recognized Pala Indian Reservation. No other tribes responded to request consultation. Therefore, no impacts would occur and no mitigation is required.

Mitigation Program

No mitigation is required.

3.19 UTILITIES AND SERVICE SYSTEMS

Would the project:

- a) **Require or result in the relocation or construction of new or expanded water, wastewater treatment, or 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 receives water and wastewater services through existing utility infrastructure connected to the existing hotel. The project site is currently developed with a hotel that is operational, and all changes are interior and have already occurred.

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 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 and 85 percent of total water use over the 25-year planning period (Anaheim 2020).

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 UWMP 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.

Water from the existing potable water lines in the vicinity of the project site would continue to be used. 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 experience a minimal increase due to the additional rooms and 6,394 SF of accessory use. The proposed project would increase the number of hotel rooms from the previously permitted 78 rooms to 106 rooms, plus 1 caretaker unit. Based on the City of

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Anaheim's water demand of 58,878 AFY in 2025, the project-generated increase in water demand would be negligible and would fall within the City's existing capacity and available supply (Anaheim 2020). It is also noted that hotel rooms and accessory uses are not occupied or in use 100 percent of the time; typical hotel occupancy is approximately 70 percent, further reducing actual water usage. 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 significant environmental effects, and the impact would be less than significant. No mitigation is required.

Wastewater. The proposed project site is situated within the Central Anaheim Master Plan of Sanitary Sewers (WAMPSS), which was adopted in 2017 and evaluates the sewer system within the central portion of the city to identify potential deficiencies (Anaheim 2017b). The WAMPSS study area evaluated the existing sewer system, which includes approximately 10,627 gross acres within the study area. A majority of the wastewater within the WAMPSS drains into one of the Orange County Sanitation District's (OCSAN) 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 (OCSAN 2025). In 2023-2024, OCSAN received an average daily flow of 192 million gallons per day of wastewater. Additionally, OCSAN supplies the OCWD with 170 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 proposed project is anticipated to generate a negligent amount of wastewater. 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 are 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) in the City of Anaheim (Anaheim 2015). The ABCCTA consists of Drainage Areas 4, 12, 14, and 19 through 23. The proposed project is located within Drainage Area 22. Drainage Area 22 drains approximately 940 acres and is generally bounded by Lewis Street and the Union Pacific Railroad

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easement on the east, Katella Avenue on the south, Ninth Street and Walnut Street on the west, and Ball Road on the north. Generally, water flows over land and then through pipes from east to west and drains into the double 8-foot by 8.5-foot SWRCB storm drain in Katella Avenue. The proposed project would not result in an increase in impervious surface area on site. Therefore, impacts to stormwater drainage facilities would be less than significant and 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 2022/23 was 2,694,915 megawatt-hours (MWh) (Anaheim Public Utilities 2023). According to the California Energy Commission, total electricity consumption for Orange County in 2022 was 20,243 GWh (California Energy Commission 2022a).

The project site is currently developed with a hotel that is operational, and all changes are interior and have already occurred. As a result, the proposed project is a request to permit and retain the previously completed work and would not include new construction activities and therefore no construction related energy use would be required. During operation, the proposed project would experience a minimal increase in usage due to the additional 29 rooms and 6,394 SF of accessory use and the increase in energy use would be negligible. Therefore, impacts to local regional supplies of electricity would be less than significant, and no mitigation is 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 572 million therms (California Energy Commission 2022b). All changes associated with the proposed project are interior and have already occurred and the proposed project does not involve any construction, grading, excavation, or ground-disturbing activities. Therefore no natural gas would be required for construction. During operation, the proposed project would experience a minimal increase in usage due to the additional 29 rooms and 6,394 SF of accessory use and the increase in natural gas use would be negligible. 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. The proposed project would not involve the construction or relocation of new or expanded telecommunications facilities. Further, the additional 29 rooms and 6,394 SF of accessory use would not increase telecommunication demands on the

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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) 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 in Impact 3.19(b), implementation of the proposed project would not substantially increase the demand for water supplies on the project site. As previously stated, the proposed project would maintain similar water demand from existing conditions. 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 entitlements. Therefore, impacts related to water supplies would be less than significant, and no mitigation would be required.

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?

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) 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.

Solid waste generated by the hotel would result from typical operations such as overnight guest stays, housekeeping, and food and beverage services. These uses are consistent with other commercial and hospitality developments in the city and are not expected to generate unusual or excessive amounts of solid waste. The project would be subject to compliance with applicable state and local regulations related to solid waste reduction, including mandatory commercial recycling (AB 341) and organic waste diversion (SB 1383). In addition, the proposed hotel use is consistent with the land use and development assumptions of the City's General Plan and zoning regulations, which already account for associated waste generation in long-term planning efforts.

Therefore, the project would not generate solid waste in excess of applicable standards or available landfill capacity and would not conflict with solid waste reduction goals. However, mitigation measure MM 5.19-2 from MMP 85C as included within EIR No. 340 would be applicable to the proposed project. MM 5.19-2 is related

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to ongoing operations of the Wyndham Hotel and is renumbered in this IS/MND as mitigation measure MM 3.19-1.

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

No Impact. The California Integrated Waste Management Act (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 previously, 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, the proposed project would generate a minimal increase in solid waste that would not exceed the capacity of the existing landfill serving the project site. Therefore, 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 is required.

Mitigation Program

The following mitigation measure from MMP 85C would be applicable to the proposed project as included within EIR No. 340:

- MM 3.19-1** Ongoing during project operation, the following practices shall be implemented, as feasible, by the property owner/developer:
- a. Usage of recycled paper products for stationary, letterhead, and packaging.
 - b. Recovery of materials such as aluminum and cardboard.
 - c. Collection of office paper for recycling.
 - d. Collection of polystyrene (foam) cups for recycling.
 - e. Collection of glass, plastics, kitchen grease, laser printer toner cartridges, oil, batteries, and scrap metal for recycling or recovery (ARSP EIR 340 MM 5.19-2).

3.20 WILDFIRE

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

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

Less Than Significant Impact. The proposed project would not conflict with adopted emergency response or evacuation plans. The surrounding roadways would continue to provide emergency access to the project area and surrounding properties. Vehicular access to the project site would be provided via Katella Avenue and Harbor Boulevard (see Figure 3, *Site Aerial*). No physical development would occur under the proposed project.

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Therefore, the proposed project would not result in inadequate emergency access or impact adopted emergency response and evacuation plans. Therefore, impacts would be less than significant, and no mitigation is required.

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

Less Than Significant Impact. There are three primary factors used in assessing wildfire hazards—topography, weather, and fuel. The project site is flat and in an urbanized environment and does not propose any physical development. The proposed project would not impact weather or topography. According to CAL FIRE’s Fire and Resource Assessment Program, the project area is not in a High or Very High Fire Hazard Safety Zone (FHSZ) (CAL FIRE 2024). Therefore, impacts of exposing project occupants to pollutant concentrations from or exacerbating a wildfire would be less than significant and no mitigation is required.

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

Less Than Significant Impact. The project site does not propose any physical development. The project site is currently developed with a hotel that is operational, and all changes are interior and have already occurred. The project site is not in a High or Very High FHSZ but in a highly urbanized part of the city. The proposed project would not add infrastructure such as roads or overhead power lines in areas with wildland vegetation. Therefore, impacts of exacerbating fire risks on the environment would be less than significant and no mitigation is required.

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

Less Than Significant Impact. The project site is generally flat. It is not in a designated area with potential for landslides or in a 100-year flood hazard zone (FEMA 2024). Therefore, it is unlikely that the site would be susceptible to downslope or downstream flooding or landslides as a result of postfire slope instability. The project site is also not in a Very High FHSZ. Impacts would be less than significant, and no mitigation is required.

Mitigation Program

No mitigation is required.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

- a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially**

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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?

No Impact. As articulated in Section 3.4, *Biological Resources*, no special-status or endangered species are expected to occur within the project area or to be affected by the proposed project. There is no temporary or permanent removal of riparian or wetland vegetation that would occur by implementation of the proposed project. 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. Because the proposed project does not involve any ground-disturbing activities the potential to encounter unknown archaeological resources is minimal. Therefore, there would be no impact and no mitigation is required.

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 With Mitigation. Based on the preceding analysis provided in Section 3.0, *Environmental Analysis*, of this Initial Study, implementation of the proposed project, as described in Section 1.5, *Project Description*, would have no impact or less than significant impacts for the following environmental issue areas: agriculture and forestry resources; biological resources; cultural resources; energy; geology and soils; greenhouse gas emissions; hazards and hazardous materials; land use and planning; mineral resources; population and housing; recreation; tribal cultural resources; and wildfire.

The proposed project's impacts on the following issue areas would be less than significant with the implementation of project-specific mitigation measures: aesthetics; air quality; hydrology and water quality; noise; public services; transportation, and utilities and service systems.

Thus, the proposed project would not result in environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly, with the implementation of mitigation measures. All impacts would be less than significant after mitigation.

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

Less Than Significant With Mitigation . The following sections in this Initial Study reviewed the potential for adverse impacts on human beings, either directly or indirectly: Sections 3.3, *Air Quality*; 3.7, *Geology and Soils*; 3.8, *Greenhouse Gas Emissions*; 3.9, *Hazards and Hazardous Materials*; 3.10, *Hydrology and Water Quality*; 3.13, *Noise*; and 3.17, *Transportation*. After analyzing all potential impacts, it has been determined that there would be no

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adverse effects on human beings associated with implementation of the proposed project with the implementation of project-specific mitigation measures. Therefore, impacts would be less than significant with mitigation.

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