

City of Buena Park

5600 BEACH BOULEVARD RESIDENTIAL DEVELOPMENT PROJECT

April 2026 | Initial Study / Mitigated Negative Declaration



April 2026 | Initial Study / Mitigated Negative Declaration

5600 BEACH BOULEVARD RESIDENTIAL DEVELOPMENT PROJECT

for City of Buena Park

Lead Agency

Contact: Ian McAleese, Senior Planner
6650 Beach Boulevard
Buena Park, California 90621
714.562.3616

Prepared by:

PlaceWorks

Contact: Alen Estrada-Rodas, Senior Associate
3 MacArthur Place, Suite 1100
Santa Ana CA 92707
714.966.9220 x2107
www.placeworks.com

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ENVIRONMENTAL CHECKLIST

PROJECT INFORMATION

Project Title: 5600 Beach Boulevard Residential Development Project

Lead Agency Name and Address:

City of Buena Park
6650 Beach Boulevard
Buena Park, California 90621

Contact Person and Phone Number:

Ian McAleese
714.562.3616

Project Location: 5600 Beach Boulevard (Assessor's Parcel Number [APN] 066-572-08, 066-163-26, and 066-164-24) in the City of Buena Park, Orange County

Project Sponsor's Name and Address:

City of Buena Park
6650 Beach Boulevard
Buena Park, California 90621

General Plan Designation: Light Industrial.

Zoning: Light Industrial (ML)

Description of Project: The proposed project would comprise four components: (1) demolition of the existing Amway Nutrilite Center Campus (2) rezoning Light Industrial (ML) to Medium-Density Multi-Family Residential (RM-20); (3) general plan land use change from Light Industrial to High-Density Residential; and (4) the construction of a new residential development at 5600 Beach Boulevard. Proposed development at the project site would include 281 new units— 50 affordable senior housing apartments, 117 duets, and 114 townhomes— shared and private open spaces. The project site would include new private residential streets that would be accessible via Beach Boulevard and Darlington Avenue.

ENVIRONMENTAL CHECKLIST

Surrounding Land Uses and Setting: The project site is surrounded by residential and commercial uses—residential uses to the northeast, east, south, and west; commercial uses to the north and south; and light industrial uses to the north and northwest. The nearest sensitive receptors to the project site are to the west across Beach Boulevard and to the south across the Brea Creek Channel.

Other Public Agencies Whose Approval Is Required (e.g., Permits, Financing Approval, or Participating Agreement):

- Orange County Fire Authority (OCFA)
- California Department of Transportation (Caltrans)

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.?

The City of Buena Park invited California Native American tribes that are traditionally and culturally affiliated with the project area to consult on the proposed project via certified mail and email on December 3, 2025. Seven tribes were contacted—the Cahuilla Band of Indians, Gabrieleño Band of Mission Indians–Kizh Nation, Gabrielino-Tongva Tribe, Soboba Band of Luiseno Indians, Juaneño Band of Mission Indians, Gabrieleño/Tongva San Gabriel Band of Mission Indians, and Santa Rosa Band of Cahuilla Indians. The City received a response from Gabrieleño Band of Mission Indians–Kizh Nation and the Juaneño Band of Mission Indians. The City conducted consultation with the Gabrieleño Band of Mission Indians–Kizh Nation via email on March 9, 2026; and consultation with the Juaneño Band of Mission Indians via virtual meeting on March 19, 2026. Tribal consultation pursuant to AB 52 concluded on March 19, 2026 for the proposed project. Additionally, Tribal Consultation pursuant to SB 18 also concluded on March 19, 2026.

ENVIRONMENTAL CHECKLIST

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

- | | | |
|--|---|---|
| ☐ Aesthetics | ☐ 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 |

ENVIRONMENTAL CHECKLIST

DETERMINATION

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier 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.

Ian McAleese

Digitally signed by Ian McAleese
DN: C=US, E=imcaleese@buenapark.com, O=City of Buena Park,
OU=Community Development, CN=Ian McAleese
Reason: I am approving this document
Date: 2026.03.30 08:25:00-0700

Signature

March 30, 2026

Date

Ian McAleese

Printed Name

Senior Planner

Title

1. INTRODUCTION

1.1 OVERVIEW

Shopoff Realty Investments (Applicant) proposes to construct a new, 281-unit residential development (proposed project) at 5600 Beach Boulevard in the City of Buena Park (project site). The proposed project would include 50 affordable senior housing apartments, 117 duets, 114 townhomes, and shared and private open spaces. Additionally, the proposed project would include a zone change from Light Industrial (ML) to Medium-Density Multi-Family Residential (RM-20), and a general plan land use change from Light Industrial to High-Density Residential.

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

1.2 CALIFORNIA ENVIRONMENTAL QUALITY ACT

The environmental compliance process is governed by the California Environmental Quality Act (CEQA) and the CEQA Guidelines (Public Resources Code [PRC], Section 21000 et seq.; California Code of Regulations [CCR], Title 14, Sections 15000 et seq.). CEQA was enacted in 1970 by the California Legislature to disclose to decision-makers and the public the significant environmental effects of projects and to identify ways to avoid or reduce the environmental effects through feasible alternatives or mitigation measures. Compliance with CEQA applies to California government agencies at all levels: local, regional, and State agencies, boards, commissions, and special districts (such as school districts and water districts). The City is the lead agency for the proposed project and is therefore required to conduct an environmental review to analyze the potential environmental effects associated with the proposed project.

PRC Section 21080(a) states that analysis of a project's environmental impact is required for any "discretionary projects proposed to be carried out or approved by public agencies...." In this case, the Lead Agency has determined that an Initial Study is required to determine whether there is substantial evidence that construction and operation of the proposed project would result in environmental impacts.

1. INTRODUCTION

A “project” means the whole of an action that has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following:

- An activity directly undertaken by any public agency including but not limited to public works construction and related activities clearing or grading of land, improvements to existing public structures, enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code sections 65100 to 65700.
- An activity undertaken by a person which is supported in whole or in part through public agency contacts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.
- An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies. (14 CCR section 15378[a]).

The proposed discretionary actions by the project applicant constitute a “project” because the activity would result in a direct physical change in the environment and would be undertaken by a public agency. All “projects” in the State of California are required to undergo an environmental review to determine the environmental impacts associated with implementation of the project.

1.3 INITIAL STUDY

The purpose of the Initial Study is to 1) provide the lead agency with information to use as the basis for deciding the proper type of CEQA document to prepare; 2) enable the lead agency to modify a project, mitigating adverse impacts before an Environmental Impact Report (EIR) is prepared, thereby enabling the project to qualify for a negative declaration; 3) assist in the preparation of an EIR, if one is required; 4) facilitate environmental assessment early in the design of a project; 5) provide documentation of the factual basis for the findings in a Mitigated Negative Declaration (MND) or Negative Declaration (ND); 6) eliminate unnecessary EIRs; and 7) determine if a project is covered under a previously prepared EIR. When an Initial Study identifies the potential for immitigable significant environmental impacts, the lead agency must prepare an EIR (14 CCR section 15064); however, if all impacts are found to be less than significant or can be mitigated to a less-than-significant level, the lead agency can prepare an ND, or MND that incorporates mitigation measures into the project (14 CCR section 15070).

1.4 MITIGATED NEGATIVE DECLARATION

The MND includes information necessary for agencies to meet statutory responsibilities related to the proposed project. State and local agencies will use the MND when considering any permit or other approvals necessary to implement the project. A list of the environmental topics that have been identified for study in the MND is provided in the Environmental Checklist.

One of the primary objectives of CEQA is to enhance public participation in the planning process; public involvement is an essential feature of CEQA. Community members are encouraged to participate in the environmental review process, request to be notified, monitor newspapers for formal announcements, and submit substantive comments at every possible opportunity afforded by the Lead Agency. The environmental review process provides several opportunities for the public to participate through public notice and public review of CEQA documents and at public meetings.

1.5 LEVELS OF SIGNIFICANCE

The following terminology is used to describe the level of significance of impacts. Although the criteria for determining significance are different for each topic area, the environmental analysis applies a uniform classification of the impacts based on definitions consistent with CEQA and the CEQA Guidelines:

- **No impact.** The project would result in no adverse effect on the environment.
- **Less than significant.** The project would not exceed the established significance criteria.
- **Less than significant with mitigation incorporated.** The project would exceed the established significance criteria without mitigation measures, but one or more mitigation measures would reduce the impact to a less-than-significant level successfully.
- **Potentially significant.** The project would exceed the established significance criteria, and either no feasible mitigation measures are available to reduce the impact to a less-than-significant level, or more analysis is needed to determine if feasible mitigation measures are available to reduce the impact to a less-than-significant level. If any impact is identified as potentially significant, an EIR is required.

Mitigation Measures. If, after incorporation and implementation of federal, State, and local regulations, there are still significant environmental impacts, then feasible and project-specific mitigation measures are required to reduce impacts to less-than-significant levels. Mitigation measures must further reduce significant environmental impacts above and beyond compliance with federal, State, and local laws and regulations. Mitigation under CEQA Guidelines Section 15370 includes:

1.INTRODUCTION

- Avoiding the impact altogether by not taking a certain action or parts of an action.
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- Compensating for the impact by replacing or providing substitute resources or environments.

2. PROJECT DESCRIPTION

2.1 PROJECT LOCATION

The 13.76-acre project site is at 5600 Beach Boulevard in the City of Buena Park (Assessor's Parcel Numbers 066-572-08, 066-163-26, and 066-164-24) in Orange County (see Figure 1, *Regional Location*). The City of Buena Park is bounded by Fullerton and the County of Los Angeles to the north, Anaheim to the east, Cypress and Anaheim to the south, and La Palma and Los Angeles County to the west.

2.1.1 Regional and Local Setting

Regional access to the project site is provided by Interstate (I-) 5, approximately one mile to the south. The project site is bounded by Beach Boulevard (California State Route 39) to the west, Brea Creek Channel to the south, and railroad tracks to the north and east. The project site is currently occupied by the Amway Nutrilite Center Campus (see Figure 2, *Local Vicinity*).

2.2 ENVIRONMENTAL SETTING

2.2.1 Existing Land Use and Zoning

The project site has a zoning designation of Light Industrial (ML), which is designated for small- and medium-sized industrial uses that are not likely to have adverse effects on each other or on neighboring residential and commercial areas (BPMC § 19.504.020.B.3). Consistent with the existing zoning, the project site has a general plan land use designation of Light Industrial. Uses permitted range from business parks to smaller multi-tenant developments. Other light industrial activities may include contractor's yards, research and development, limited light manufacturing, warehousing, distribution, assembly, and laboratories. Limited retail and offices affiliated with primary industrial and manufacturing activities are permitted. Floor area ratios of up to 0.6 are permitted (Buena Park 2010a). The proposed project would require land use and zoning changes to the project site.

2.2.2 Surrounding Land Use and Zoning

The project site is surrounded by residential and commercial uses—residential uses to the northeast, east, south, and west; commercial uses to the north and south; and light industrial uses to the north and northwest. The nearest sensitive receptors to the project site are single-

2. PROJECT DESCRIPTION

family residences to the west across Beach Boulevard and to the south across the Brea Creek Channel.

2.2.3 Existing Conditions

AMWAY NUTRILITE CENTER CAMPUS

The project site is currently occupied by a 370,031-square-foot manufacturing facility, operated by Amway Nutrilite, that consists of two connected buildings. Operation of the Amway Nutrilite warehouse will end in December 2026. The project site also contains 196,119 square feet of off-street parking, solar canopies, and landscaping (see Figure 3, *Aerial Photograph*, and Figure 4, *Existing Site*). The Amway Nutrilite Center Campus would be demolished as part of the proposed project.

2.3 PROPOSED PROJECT

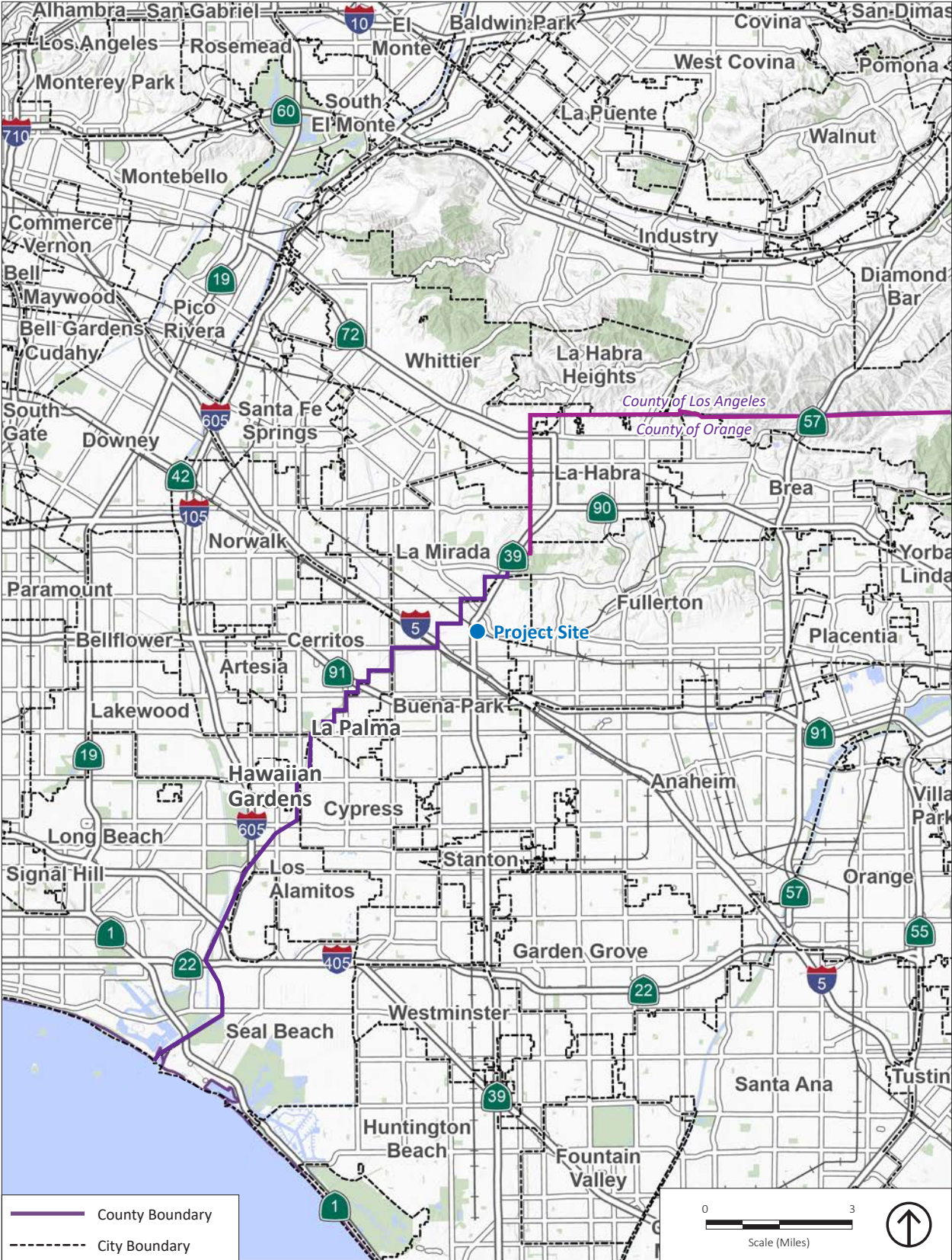
The proposed project would include four components: (1) demolition of the existing Amway Nutrilite Center Campus (2) rezone from Light Industrial (ML) to Medium-Density Multi-Family Residential (RM-20); (3) change the general plan land use designation from Light Industrial to High-Density Residential; and (4) construct a new residential development at 5600 Beach Boulevard. Proposed development at the project site would include 281 new units—50 affordable senior housing apartments, 117 duets, and 114 townhomes— shared and private open spaces. The project site would include new private residential streets that would be accessible via Beach Boulevard and Darlington Avenue (see Figure 5, *Project Site Plan*).

2.3.1 Proposed Rezoning and General Plan Land Use Change

The proposed project would rezone the project site from Light Industrial (ML) to Medium-Density Multi-Family Residential (RM-20). The RM-20 zone is intended for the development and preservation of medium-density apartments, condominiums, and group quarters in locations convenient to community commercial, recreational, and cultural activities (BPMC § 19.404.20.C).

Additionally, the proposed project would require a general plan land use change from Light Industrial to High-Density Residential, which allows for apartment and condominium development, with densities ranging from 20 units per acre to 48 units per acre with senior affordable housing bonuses. Public facilities are also permitted in this land use category (Buena Park 2010a).

5600 BEACH BOULEVARD RESIDENTIAL DEVELOPMENT PROJECT INITIAL STUDY
CITY OF BUENA PARK



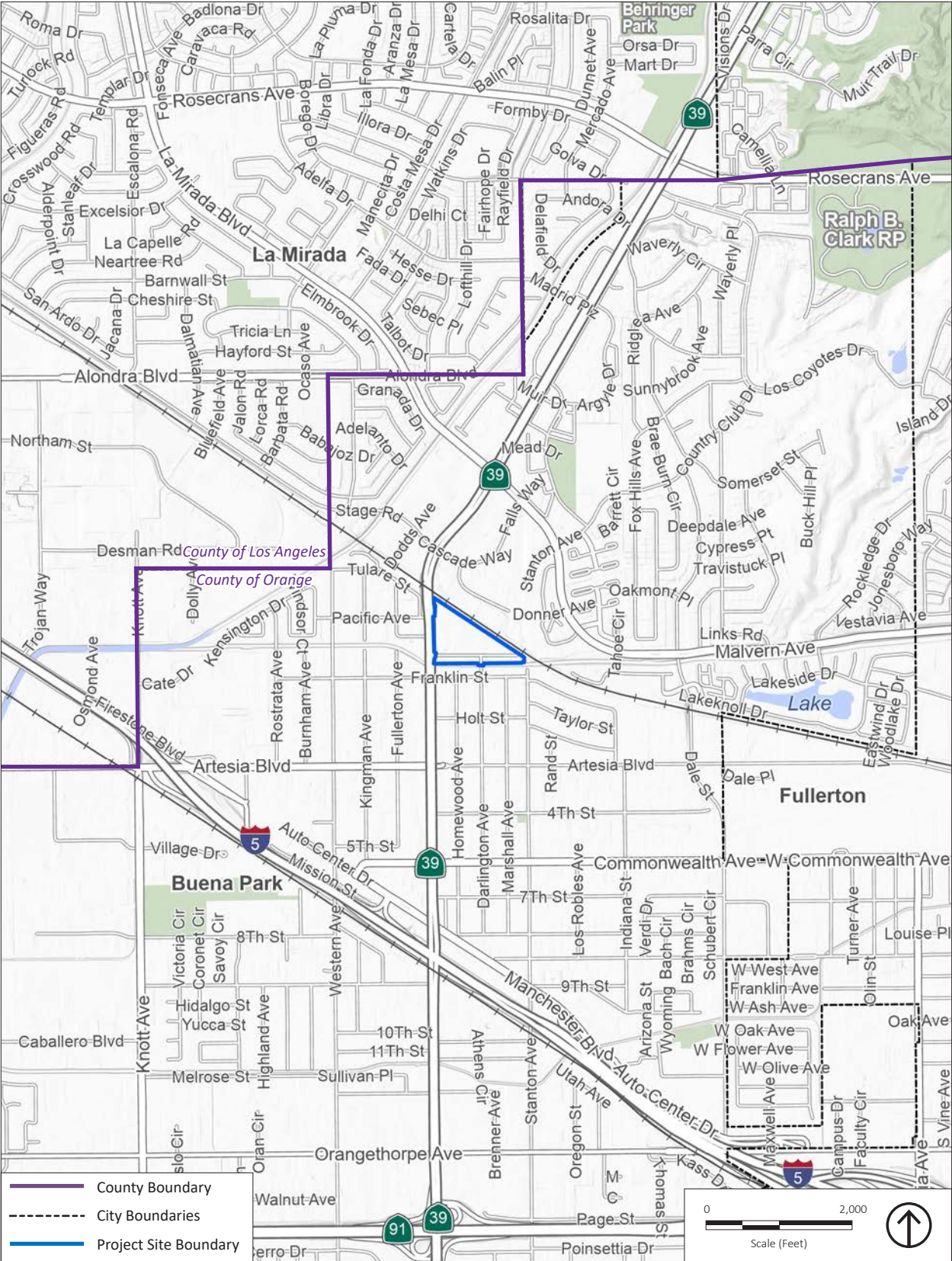
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Figure 1
Regional Location Map

2. PROJECT DESCRIPTION

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5600 BEACH BOULEVARD RESIDENTIAL DEVELOPMENT PROJECT INITIAL STUDY
CITY OF BUENA PARK

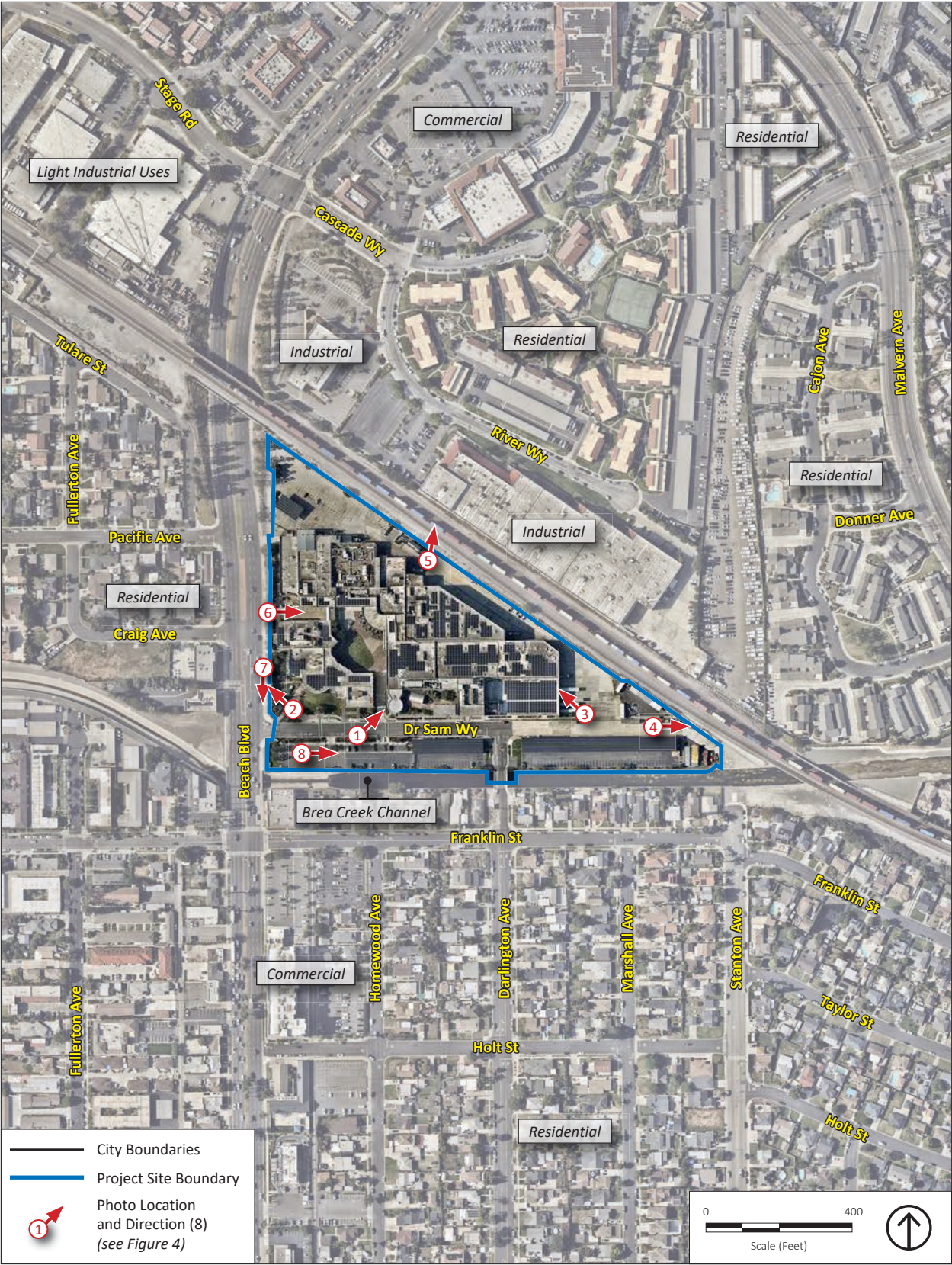


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Figure 2
Local Vicinity

2. PROJECT DESCRIPTION

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Source: Nearmap 2025.

Figure 3
Aerial Photograph

2. PROJECT DESCRIPTION

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Photo 1 shows Dr. Sam Way facing northeast.



Photo 2 shows Dr. Sam Way and Beach Boulevard facing northwest.



Photo 3 shows interior parking lot facing northwest.



Photo 4 shows interior parking lot facing east.



Photo 5 shows interior parking lot facing northeast.



Photo 6 shows driveway facing east from Beach Boulevard.



Photo 7 shows Beach Boulevard facing south.



Photo 8 shows exterior parking lot facing east.

Source: PlaceWorks 2025.

Figure 4
Existing Site

2. PROJECT DESCRIPTION

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Source: ktgy 2025.

Figure 5
Project Site Plan

2. PROJECT DESCRIPTION

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2. PROJECT DESCRIPTION

2.3.2 Residential Development

As shown in Table 1, *Proposed Residential Development*, the proposed project would develop a four-story senior affordable apartment building with 50 units, 117 duet homes, and 114 townhomes. The proposed project is anticipated to house approximately 593 new residents, with 73 residents in the senior affordable apartments, 264 residents in the duet homes, and 256 residents in the townhomes.

Table 1 Proposed Residential Development

Residential Development	Type	Acreage	Units	Maximum Stories	Anticipated Population
Apartments	Affordable Housing	0.76	50	4	73 ¹
Duets	Multi-family	6.58	117	3	264 ²
Townhomes	Multi-family	6.42	114	3	256 ²
Total		13.76	281	-	593

Source: Shopoff Realty Investments 2025.

1. 1.46 persons/ affordable unit

2. 2.25 persons/unit

The proposed project would construct a total of 83 buildings that would encompass 602,230 square feet on the project site—an affordable senior apartment building, 22 townhome buildings, 59 duet home buildings, and a pool building. The proposed affordable senior apartment building would have a maximum height of 48 feet; all duet homes and townhomes would have a maximum height of 39 feet; and the pool building would have a maximum height of 10 feet (see Table 2, *Residential Development Square Footage*).

Table 2 Residential Development Square Footage

Proposed Site Feature	Quantity	Total Area (Square Feet) ¹	Footprint per Building (Acres)	Units	Max Building Height (Feet)
Affordable Senior Apartments					
Affordable Senior Apartments Total	1	42,700	0.25	50	48
Townhomes and Duets					
Townhomes- Building A	3	28,794	0.07	12	39
Townhomes - Building B	9	104,562	0.09	45	39
Townhomes- Building C	3	36,189	0.09	15	39
Townhomes - Building D	7	97,902	0.10	42	39

2. PROJECT DESCRIPTION

Table 2 Residential Development Square Footage

Proposed Site Feature	Quantity	Total Area (Square Feet) ¹	Footprint per Building (Acres)	Units	Max Building Height (Feet)
Duet homes – Duets	58	287,506	0.04	116	39
Duet homes - Duet Single	1	4,140	0.02	1	39
Townhomes and Duets Total	81	559,093	-	231	-
Pool Building					
Pool Building Total	1	437	0.01	-	10
Proposed Project Total	83	602,230	-	281	-

1 Total Area refers to the gross floor area, defined as the sum of all finished, heated, and livable space across all floors, including upper stories and finished basements.

Source: KTG Architecture + Planning 2025.

AFFORDABLE SENIOR HOUSING

The affordable senior apartments would be in the northwest corner of the project site and have dedicated open parking spaces. The proposed apartment would provide social services to low-income residents within National CORE affordable housing communities. Exact services would be determined based on an assessment of individual needs of residents. Illustrative representations of the proposed project are shown in Appendix A.

DUET HOMES AND TOWNHOMES

The duet homes would be located in the southern portion of the project site adjacent to the southern property line, while the townhomes would be centrally situated. The duet homes and townhomes would have 2, 3, or 4 bedrooms; range from 1,238 square feet to 1,947 square feet; and include two-car garages. The townhomes and duet homes would each be designed in one of two architectural styles. Illustrative representations of the proposed project are shown in Appendix A.

Duet Homes and Townhomes

- **Style A** would reflect modern farmhouse style, which has concrete flat roof, board and batten, gable ends, and shed roofs with kickers over entries. This style would include the use of wood-textured composite shutters, kickers, shelves, rafter tails, and thick-trim windows to represent the style.
- **Style B** would emulate a modern Spanish style with clean lines, arched entries, tile surrounds, S-tile roof, and wall accents with stucco foam shelves. This style would also incorporate gable

2. PROJECT DESCRIPTION

accent details, shutters, wrought-iron window details, and corbels. The warm white, cream, and tan stucco colors imitate a familiar Spanish style and would help to accentuate entries.

2.3.3 Open Space

The proposed project would have 183,999 square feet of open space and common space areas, including 5,973 square feet of private balcony space, 3,574 square feet of ground-floor open space, and 174,452 square feet of common space amenities. Active amenities for the affordable site include an open space lawn, dog relief area, and seating areas. Amenities for the duet homes and townhomes would include a community pool, spa, BBQ/seating area, paseos, dog relief areas, and open recreation area (see Figure 6, *Open Space Areas*).

2.3.4 Parking and Circulation

VEHICULAR ACCESS

Pedestrian and vehicular access to the project site would be provided via two access points on Beach Boulevard and one access point from the south off Darlington Avenue that crosses the Brea Creek Channel. The proposed project would also include an eight-foot-high concrete-block wall with terraced landscaping as well as parking and dedicated landscaped open space areas to act as a buffer for the railroad tracks at the northeast edge of the site (see Figures 7a and 7b, *Landscaping Plan*).

PARKING

The proposed project would include a total of 567 off-street parking spaces over 121,131 square feet. Each duet home and townhome unit would have a private two-car garage. Additionally, the proposed project would include guest parking on-site distributed throughout the site. The proposed project would also include 231 electric vehicle (EV) capable spaces (see Table 3, *Proposed Parking*).

2. PROJECT DESCRIPTION

Table 3 **Proposed Parking**

Proposed Parking	Number of Spaces	Ratio	Total Square Feet	EV Capable Spaces¹	EV Ready Spaces²
Garage Parking Spaces	462	1.64/unit	101,871	231	0
On-Site/Guest Spaces	105	0.37/unit	19,260	0	0
Total	567	-	121,131	231	0

Source: Shopoff Realty Investments 2025 and KTG Architecture + Planning. 2025

1. **EV Capable Spaces.** Stalls that are provided with electrical panel capacity and space (i.e., via a raceway) to support the future installation of one 40-ampere, 208/240-volt (Level 2), dedicated branch circuit. No wiring or connections will be installed, but EV capable spaces will have underground conduits capable of being outfitted with the necessary wiring to install an above-ground charging module.

2. **EV Ready Spaces.** Stalls that have electrical panel capacity, along with adequate space and wiring, to support one 40-ampere, 208/240-volt (Level 2), dedicated branch circuit for a Level 2 above-ground charging module.

2.3.5 Infrastructure Plan

Sewer lines, storm drains, and water lines for the proposed project would connect to existing infrastructure along Beach Boulevard. All infrastructure improvements would comply with City code requirements and standards.

WATER

Existing 8-inch and 4-inch water lines are present in Dr. Sam Way and Beach Boulevard adjacent to the project site. The existing water main in Beach Boulevard is the most optimal facility for direct points of connection with future private site water facility improvements. The proposed potable water system would be supplied through two new points of connection: one connection would be at the existing 8-inch main in Dr. Sam Way, and the other at the existing 10-inch main in Franklin Street. The connection in Franklin Street would be made along Darlington Avenue and require the main to cross the Brea Creek Channel attached to the existing bridge. The proposed on-site water system would be private and looped internally.

The existing 8-inch public water line in Dr. Sam Way would be removed within the property boundary. The existing 8-inch public water would be cut and plugged in Stanton Avenue outside of the project site.

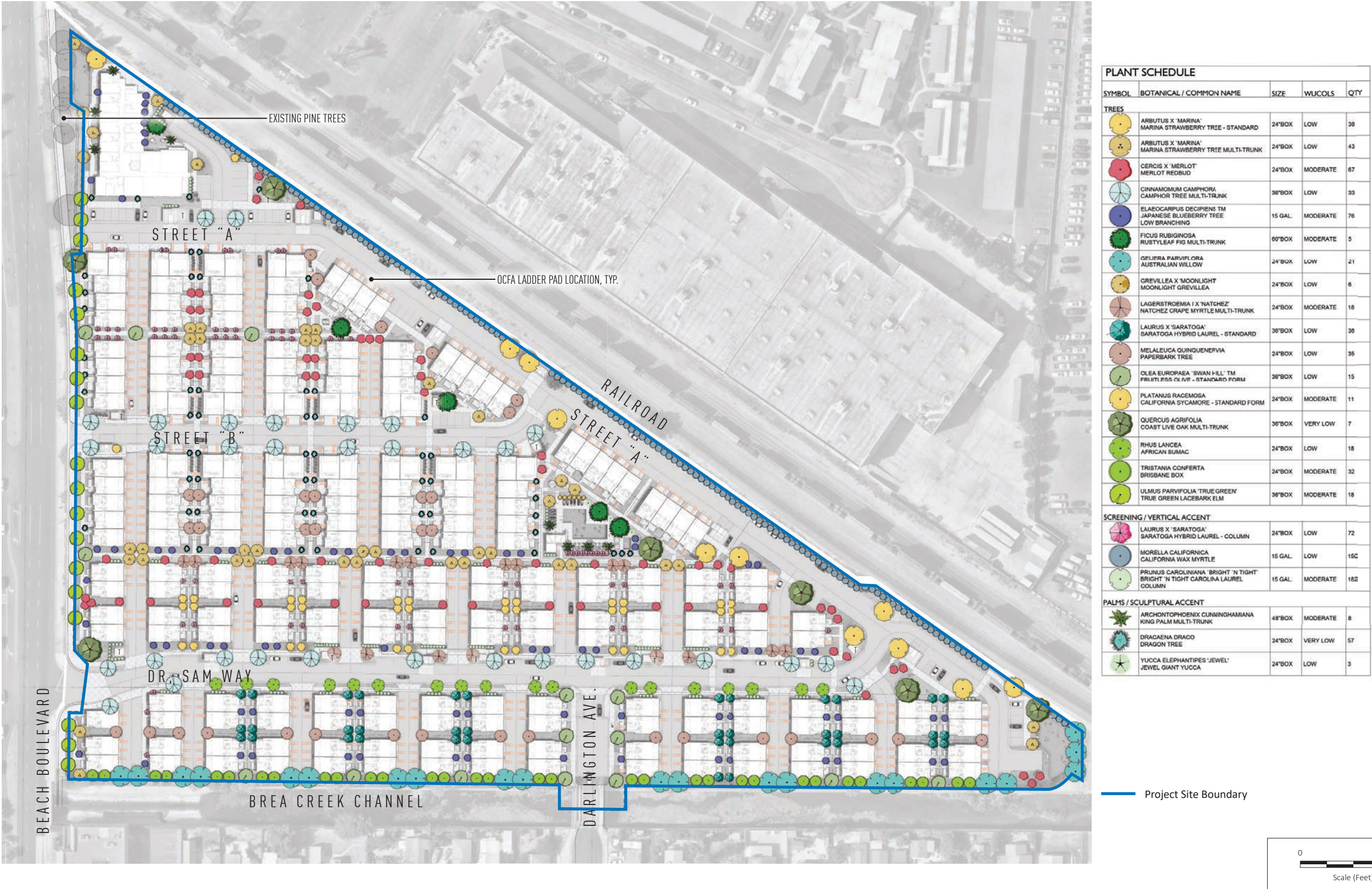


Source: ktgy 2025.

Figure 6
Open Space Areas

2. PROJECT DESCRIPTION

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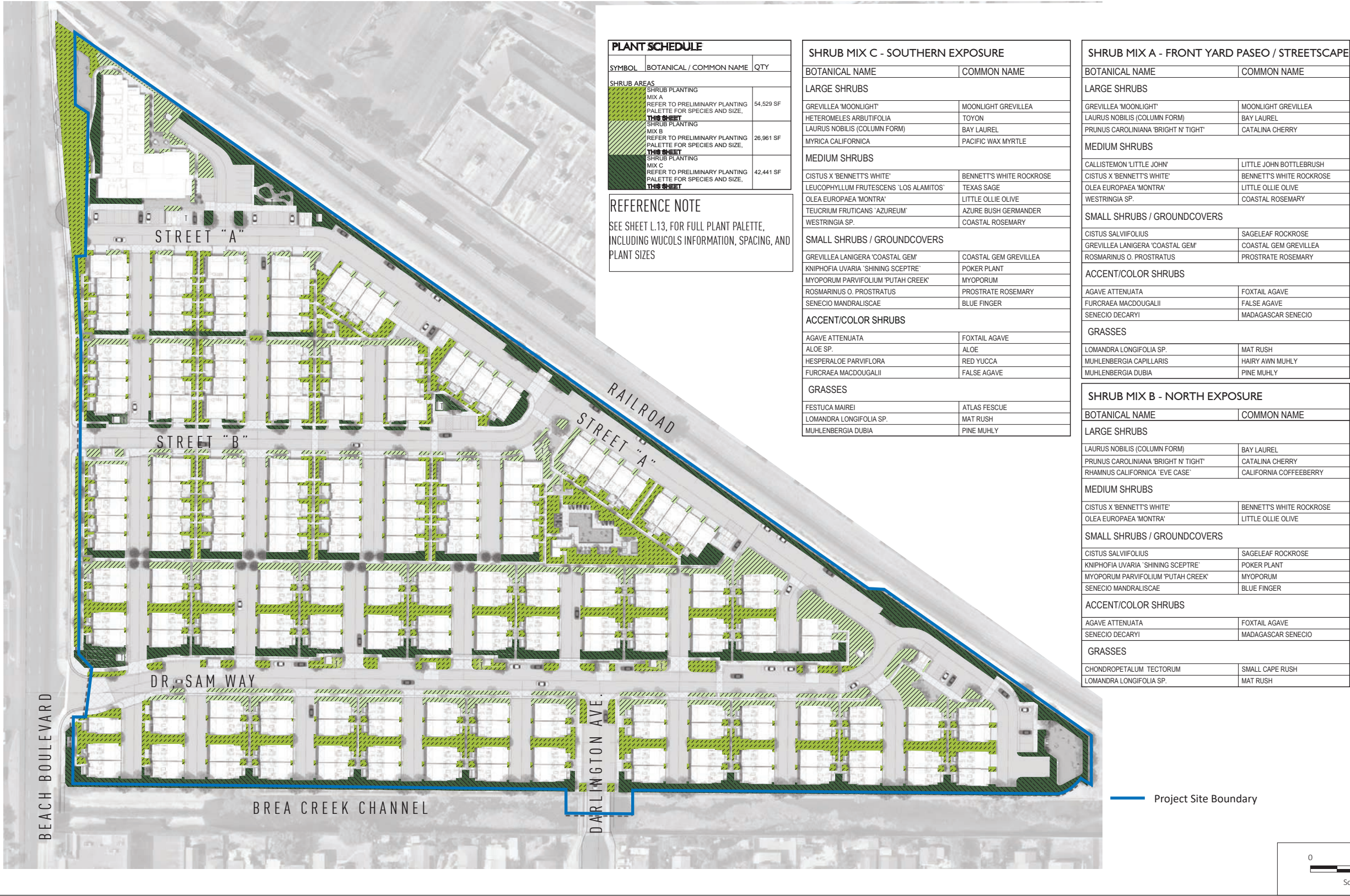


Source: MJS Landscape Architecture 2025.

Figure 7
Landscaping Plan

2. PROJECT DESCRIPTION

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Source: MJS Landscape Architecture 2025.

Figure 7
Landscaping Plan

2. PROJECT DESCRIPTION

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2. PROJECT DESCRIPTION

FIRE SERVICE

The project site has an existing 8-inch fire service line that connects to an 8-inch water main in Dr. Sam Way. Existing fire hydrants are located along Dr. Sam Way and Beach Boulevard.

The proposed fire line would be supplied through connections to the existing water main in Beach Boulevard and Darlington Avenue to develop a looped fire suppression system with two points of connection. There are two existing fire hydrants on the eastern side of Beach Boulevard that can service the property. Pursuant to the California Building Code, the proposed project would install 11 new fire hydrants on the project site. The existing fire line loop would be removed, and a new private fire line loop constructed.

SEWER

The project site is served by existing 8-inch gravity sanitary sewer lines located in Dr. Sam Way and Beach Boulevard. The Dr. Sam Way line flows west and south to join a 10-inch main at Beach Boulevard, which then continues east under the railroad tracks; meanwhile, the 8-inch line in Beach Boulevard flows south to connect to that same 10-inch main at the Dr. Sam Way intersection. Multiple existing laterals currently extend from these mains to the site.

The proposed development will utilize a gravity system with direct connections to these existing mains, as they represent the most optimal utility facilities for the project. As part of the site improvements, the 8-inch public sewer line in Dr. Sam Way will be rerouted between two existing manholes. This rerouted segment will remain a public facility, necessitating the dedication of a public utility easement to ensure ongoing City access and maintenance.

STORMWATER

The project site would have two distinct watershed areas based on the revised grading plan. One watershed would drain to the west to Beach Boulevard and the other would drain to the southeast to the Brea Creek Channel. Site drainage would be accommodated using a series of storm drain lines and structures. The drainage would be directed to proprietary water quality devices before discharging into the existing 36-inch City storm drain along Beach Boulevard and the Brea Creek Channel.

DRY UTILITIES

Utility meters would be provided for the proposed project per City and utility provider requirements. All existing dry utility facilities would be removed, and 11 transformers and 1 switch would be installed.

2. PROJECT DESCRIPTION

FLOOD ZONE

Part of the southern portion of the project site is adjacent to Brea Creek Channel, which is in a FEMA mapped Zone AO (depth 1 foot). The Buena Park Municipal Code Section 18.220.010 states that new construction in a FEMA-mapped Zone AO must have the lowest floor elevated above the highest adjacent grade and at least as high as the depth number specified in feet on the FEMA map. The proposed project would place the lowest floor, including basements, at the elevation required by the municipal code, which would ensure the buildings are above the FEMA flood zone.

EXISTING OIL LINE

The project site has an 8-inch abandoned oil line that is owned by Chevron. The line is along the property line on the east and north sides of the property. The oil line would be removed, the easement would be vacated, and the new easement would be dedicated to Chevron for any future development.

2.4 Project Construction

2.4.1 Construction Schedule and Activities

Project construction would occur over approximately 44 months, currently anticipated to begin in February 2027 and end in October 2030. The proposed project would be constructed in five phases:

- **Phase 1.** Demolition of the existing Amway Nutrilite Center Campus: February 2027 to May 2027
- **Phase 2.** Grading: June 2027 to September 2027
- **Phase 3.** Land Development (wet utilities, storm drain, streets, dry utilities): October 2027 to April 2028
- **Phase 4.1.** Construction of the senior affordable apartments: October 2027 to September 2029
- **Phase 4.2.** Construction of the duet homes and townhomes: May 2028 to October 2030

2. PROJECT DESCRIPTION

DEMOLITION

Phase 1 of the proposed project would demolish the Amway Nutrilite Center Campus over approximately four months, beginning in February 2027 and ending in May 2027.

PROPOSED PROJECT CONSTRUCTION

Phase 4.1 of the proposed project would construct the senior affordable apartment building over approximately 24 months, between October 2027 to September 2029. Phase 4.2 would develop the proposed duet homes and townhomes over approximately 30 months, between May 2028 to October 2030.

Construction of the proposed project would include demolition and removal of building remains, grading and excavation, trenching for site utilities and irrigation, building construction, architectural coatings, driveway and walkway construction, and landscaping improvements. Construction of the proposed project would not require pile driving or rock blasting at the project site. The construction schedule developed for the proposed project is considered conservative (i.e., it represents a “worst case” scenario).

During construction, vehicles, equipment, and materials would be staged and stored on the project site. No equipment would be staged long term around the perimeter of the project site, and no construction staging would be permitted in the public right-of-way. The construction site and staging areas would be clearly marked, and construction fencing would be installed to prevent disturbance and safety hazards. A combination of on- and off-site parking facilities for construction workers would be identified during construction.

Excavation would result in approximately 36,600 cubic yards of imported soil and no exported soil during site preparation, as shown in Table 4, *Soil Hauling During Construction*.

Table 4 **Soil Hauling During Construction**

Construction Activity	Import Volume (Cubic Yards)	Export Volume (Cubic Yards)
5600 Beach Boulevard	36,600	0

2.5 REQUIRED PERMITS AND APPROVALS

Implementation of the proposed project would require the anticipated discretionary and ministerial project approvals listed in Table 5.

2. PROJECT DESCRIPTION

This Initial Study will serve as the primary environmental document for all future actions associated with the proposed project, including any discretionary approvals requested or required to implement the proposed project. The City of Buena Park is the lead agency under CEQA and has the principal approval authority over the proposed project. The Orange County Fire Authority would also review and approve building and emergency access plans for the proposed project.

Table 5 **Permits and Approvals**

Lead Agency	Action
City of Buena Park	<ul style="list-style-type: none">■ Adoption of the IS/MND■ Approval of Zone Change■ Approval of General Plan Land Use Designation Amendment■ Approval of the Conditional Use Permit■ Approval of the Tentative Tract Map■ Issuance of construction permits
Orange County Fire Authority	<ul style="list-style-type: none">■ Fire Department approval of building and emergency access plans for compliance with Fire Code

3. ENVIRONMENTAL EVALUATION

This section includes a checklist for each environmental topic, evaluates the significance criteria in the checklists, and, if necessary, provides mitigation measures to reduce potential impacts.

I. Aesthetics

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

Issues	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In 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?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

DISCUSSION

a) *Would the proposed project have a substantial adverse effect on a scenic vista?*

No Impact. A scenic vista is defined as a viewpoint that provides expansive views of a highly valued landscape feature (e.g., a mountain range, lake, or coastline) or of a significant historic or architectural feature (e.g., views of a historic structure). The Buena Park General Plan does not identify any scenic vistas either on or adjacent to the site that would be impacted by the proposed

3. ENVIRONMENTAL EVALUATION

project. Ralph B. Clark Park, a regional park in Orange County, is approximately two miles northeast of the project site, but it is not a designated scenic vista. The proposed project would not impact any scenic vistas.

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

No Impact. The California Scenic Highway System lists the highways within the state that are either currently designated by the California Department of Transportation (Caltrans) as scenic highways or are eligible for that designation. There are no designated or eligible scenic highways within Buena Park or the project area (Caltrans 2025). The closest State-designated scenic highway is State Route 91, in the city of Anaheim, approximately 10 miles east of the project site. Due to the distance from this highway and urban surroundings of the project site, the project site is not visible from this highway. Therefore, the proposed project would not substantially degrade scenic resources within a State scenic highway and no impact would occur.

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

Less-Than-Significant Impact. The project site currently has a land use designation and zoning of Light Industrial. The proposed project would change the land use designation of the project site to High Density Residential and the zoning to Medium-Density Multifamily Residential. The project site is surrounded by residential and commercial uses—residential uses to the northeast, east, south, and west, commercial uses to the north and south, and light industrial uses to the north and northwest. The proposed project would allow residential development and landscaped areas that would improve the project site and complement the surrounding uses. The residential development would consist of affordable senior apartment building, duet homes and townhomes with two different architectural styles. The proposed affordable senior apartment building would have a maximum height of 48 feet; all duet homes and townhomes would have a maximum height of 39 feet. The City will review all design, architectural, and landscape plans prior to the issuance of building permits to ensure the development is consistent throughout the site and meets the intent of the design that is desirable for the City. Therefore, impacts would be less than significant.

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

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

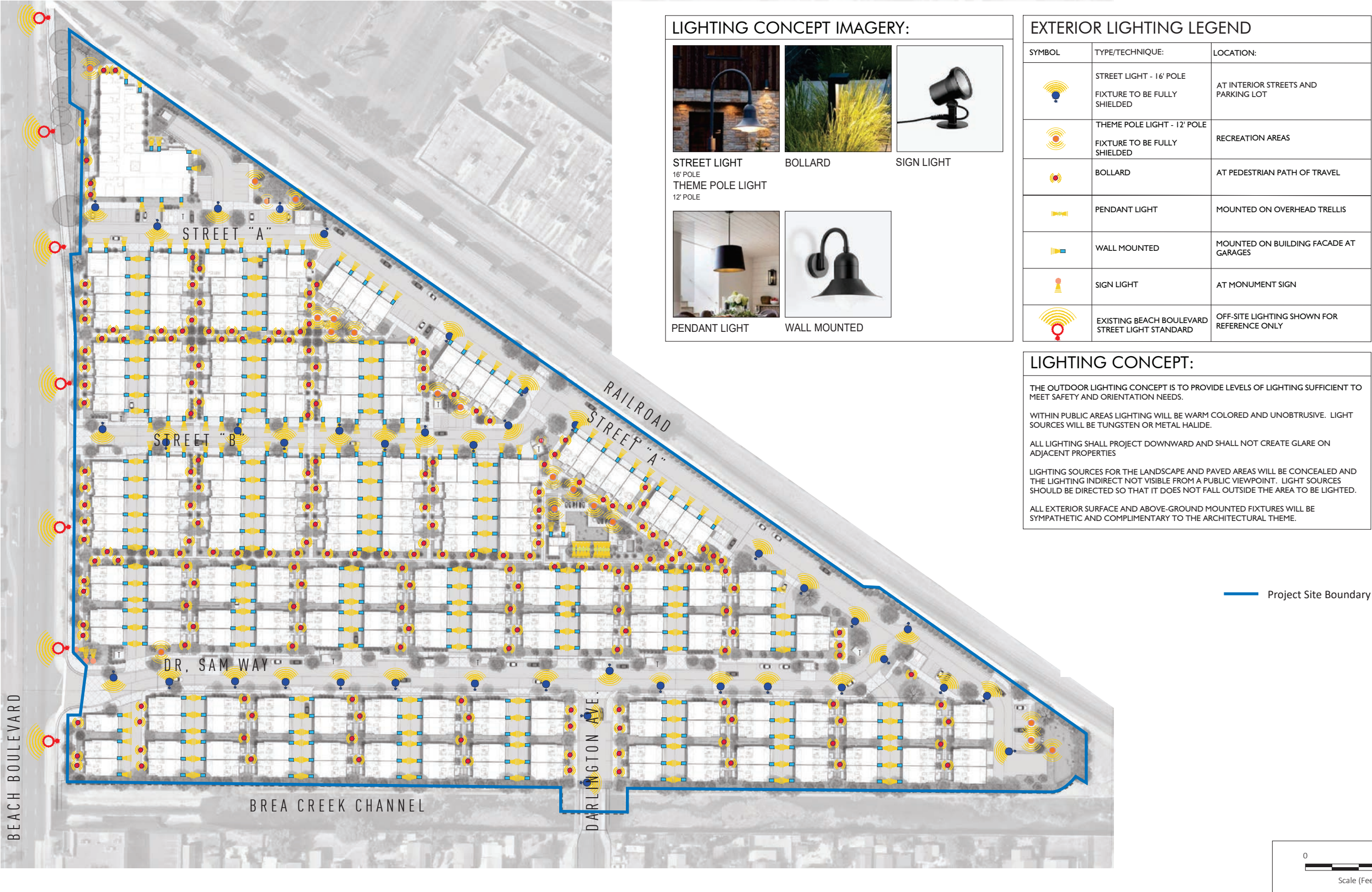
3. ENVIRONMENTAL EVALUATION

environment of the immediate project area and include streetlights, parking lot lighting, security lights, vehicular headlights, and reflective building surfaces and windows.

The project site is currently occupied by the Amway Nutrilite warehouse that has lighting in place. The proposed project would not incrementally increase light and glare in the area compared to existing conditions. The proposed project would include lighting typical of residential development, such as outdoor, landscape, and accent lighting (see Figure 8, *Project Site Lighting*). All outdoor lighting would comply with City of Buena Park lighting requirements and policies that require energy-efficient outdoor lighting that is fully shielded and aimed downward. The design and construction of the proposed project would follow these policies, would be subject to the City's design review process, and would match the light and glare existing in the neighborhood. Therefore, light and glare impacts would be less than significant.

3. ENVIRONMENTAL EVALUATION

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Source: ktgy 2025.

Figure 8
Project Site Lighting

3. ENVIRONMENTAL EVALUATION

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3. ENVIRONMENTAL EVALUATION

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:

Issues	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

3. ENVIRONMENTAL EVALUATION

DISCUSSION

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

No Impact. The California Department of Conservation's (DOC) Farmland Mapping and Monitoring Program (FMMP) produces maps and statistical data for analyzing impacts on California's agricultural resources. Agricultural land is rated according to soil quality and irrigation status and is divided into five categories: Prime Farmland, Farmland of Statewide Importance, Farmland of Local Importance, Unique Farmland, and Grazing Land. According to the FMMP, the project site is mapped as "Urban and Built-up Land" (DOC 2022). The project site is currently occupied by a 370,031-square foot manufacturing facility, off-street parking, solar canopies, and landscaping. The project site is surrounded by residential and commercial uses. The closest farmland is designated "Grazing Land" and is approximately 1.8 miles south of the project site. The project site does not contain any farmland and would not disturb any type of farmland. Therefore, the proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a nonagricultural use, and no impact would occur.

- b) ***Would the proposed project conflict with existing zoning for agricultural use, or a Williamson Act contract?***

No Impact. Williamson Act contracts restrict the use of privately owned land to agriculture and compatible open-space uses under contract with local governments; in exchange, the land is taxed based on actual use rather than potential market value. According to the California Williamson Act Enrollment Finder there is no Williamson Act contract in effect on the project site. Therefore, the proposed project would not conflict with an existing Williamson Act contract, and no impact would occur.

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

No Impact. The project site currently has a land use designation and zoning of Light Industrial. The proposed project would change the land use designation of the project site to High Density Residential and the zoning to Medium-Density Multifamily Residential. The proposed project would not impact any lands zoned for forestland and timberland uses. The project site is developed with existing commercial/industrial buildings, off-street parking, solar canopies, and landscaping, and no forested land or timberland exists on-site. Therefore, development of the proposed project would not conflict with existing zoning for forest land, timberland, or land zoned timberland production, and no impact would occur.

3. ENVIRONMENTAL EVALUATION

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

No Impact. The project site is developed with commercial/industrial buildings, off-street parking, solar canopies, and landscaping. No forest land uses are present on-site nor in the immediate vicinity. Development of the proposed project would not require any changes to the existing environment that could result in the conversion of forest land into non-forest use. Therefore, no impact would occur.

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

No Impact. The project site is developed with commercial/industrial buildings, off-street parking, solar canopies, and landscaping. No forest land uses are present on-site nor in the immediate vicinity. Development of the proposed project would not require any changes to the existing environment that could result in the conversion of forest land into non-forest use. Therefore, no impact would occur.

3. ENVIRONMENTAL EVALUATION

III. Air Quality

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

The primary air pollutants of concern for which ambient air quality standards (AAQS) have been established are ozone (O₃), carbon monoxide (CO), coarse inhalable particulate matter (PM₁₀), fine inhalable particulate matter (PM_{2.5}), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), 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 O₃, and PM_{2.5} under the California and National AAQS, nonattainment for PM₁₀ under the California AAQS, and nonattainment for lead (Los Angeles County only) under the National AAQS (CARB 2026).

Furthermore, the South Coast AQMD has identified regional thresholds of significance for criteria pollutant emissions and criteria air pollutant precursors, including VOC, CO, NO_x, SO_x, PM₁₀, 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 applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

Issues	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☒	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐

3. ENVIRONMENTAL EVALUATION

Issues	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than Significant Impact	No Impact
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

The analysis in this section is based on information provided in Appendix B, of this Initial Study.

- *Air Quality, Greenhouse Gas Emissions, and Energy*, PlaceWorks, Inc., January 2026

DISCUSSION

a) *Would the proposed project 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. 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. These demographic trends are incorporated into SCAG's 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), Connect SoCal, to determine priority transportation projects and vehicle miles traveled (VMT) in the SCAG region.

As discussed in Section XIV, *Population and Housing*, the proposed project would add an estimated 593 new residents to the project site and serve the existing and planned community. Additionally, the proposed project would aid the City in meetings its Regional Housing Needs Assessment (RHNA) shortfall and would not induce substantial unplanned population growth. Construction activities associated with the proposed project would result in short-term employment only and would end upon project completion. Thus, due to the nature of the proposed project (residential only), it would not result in new long-term employment or housing for construction workers on the project site.

Additionally, as demonstrated in Air Quality impact b), the net regional emissions that would be generated by the operational phases of the proposed project would be less than the South Coast

3. ENVIRONMENTAL EVALUATION

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, and impacts would be less than significant.

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

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

Less-Than-Significant Impact with Mitigation Incorporated. Construction activities would result in the generation of air pollutants. These emissions would primarily be 1) exhaust from off-road diesel-powered construction equipment; 2) dust generated by construction activities; 3) exhaust from on-road vehicles; and 4) off-gassing of volatile organic compounds (VOCs) from paints.

As described in Section 2.4.1, *Construction Schedule and Activities*, project construction would take approximately 44 months from February 2027 to October 2030. The proposed project would be constructed in five phases:

- **Phase 1** demolition of the Amway Nutrilite Center Campus (February 2027 to May 2027)
- **Phase 2** grading (June 2027 to September 2027)
- **Phase 3** land development for infrastructure and utility services (October 2027 to April 2028)
- **Phase 4.1** construction of the senior affordable apartments (October 2027 to September 2029)
- **Phase 4.2** construction of the duet homes and townhomes (May 2028 to October 2030).

Construction activities across these phases would generate criteria air pollutants associated with construction equipment exhaust and fugitive dust from demolition, demolition debris on-site reprocessing, site preparation, rough grading, fine grading, utility trenching, building construction, paving, architectural coating, and finishing and landscaping.

Air pollutant emissions from construction activities on-site would vary daily as construction activity levels change. Construction emissions were estimated using the California Emissions Estimator Model (CalEEMod), Version 2022.1, and are based on the preliminary construction

3. ENVIRONMENTAL EVALUATION

duration provided by the City. Where specific information regarding project-related construction activities was not available, CalEEMod default information was used.

As shown in Table 6, *Unmitigated Maximum Daily Regional Construction Emissions*, maximum daily emissions for NO_x, CO, SO₂, PM₁₀, and PM_{2.5} from construction-related activities would be less than their respective South Coast AQMD regional significance threshold values. However, VOC emissions during construction of duet homes and townhomes (Phase 4.2) would exceed South Coast AQMD regional significance threshold for VOC. Projects that exceed the South Coast AQMD regional significance thresholds may result in an incremental increase in health impacts in the SoCAB from project-related increases in criteria air pollutants. Therefore, air quality impacts from project-related construction activities would be potentially significant without mitigation.

Table 6 Unmitigated Maximum Daily Regional Construction Emissions

Construction Phase	Pollutants (lbs./day) ^{1, 2}					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Year 2027						
P1 Demolition, P1 Demolition Debris On-site Reprocessing, and Site Preparation	38	38	85	<1	19	7
P2 Rough Grading	3	30	30	<1	7	3
P3 Fine Grading, P3 Utility Trenching, and P4.1 Building Construction	4	32	39	<1	7	3
Year 2028						
P3 Fine Grading, P3 Utility Trenching, and P4.1 Building Construction	4	30	39	<1	7	3
P4.1 Building Construction and P4.2 Building Construction	2	15	30	<1	3	1
Year 2029						
P4.1 Building Construction and P4.2 Building Construction	2	14	29	<1	3	1
P4.1 Building Construction, P4.2 Building Construction, P4.1 Paving, P4.1 Architectural Coating, and P4.1 Finishing and Landscaping	13	19	36	<1	4	1
P4.2 Building Construction	1	10	21	<1	3	1
Year 2030						
P4.2 Building Construction	1	9	20	<1	3	1
P4.2 Building Construction, P4.2 Paving, P4.2 Architectural Coating, and P4.2 Finishing and Landscaping	100	17	35	<1	4	1

3. ENVIRONMENTAL EVALUATION

Table 6 Unmitigated Maximum Daily Regional Construction Emissions

Construction Phase	Pollutants (lbs./day) ^{1, 2}					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Impact Analysis						
Maximum Daily Construction Emissions	100	38	85	<1	19	7
South Coast AQMD Regional Significance Threshold	75	100	550	150	150	55
Significant?	Yes	No	No	No	No	No

Source: CalEEMod Version 2022.1; South Coast AQMD 2023.

Notes: Highest winter or summer emissions are reported. See Appendix B.

P=Phase

1. Includes implementation of fugitive dust control measures required by South Coast AQMD under Rule 403, including watering disturbed areas a minimum of two times per day, reducing speed limit to 25 miles per hour on unpaved surfaces, and street sweeping with Rule 1186-compliant sweepers.

2. Based on the preliminary information provided by the City. Where specific information regarding proposed project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by South Coast AQMD of construction equipment.

Because VOC emissions would exceed South Coast AQMD regional significance threshold, Mitigation Measure AQ-1 would be necessary to reduce impacts to less than significant levels. Mitigation Measure AQ-1 stipulates the use of super-compliant VOC paints for all coating phases. As shown in Table 7, *Mitigated Maximum Daily Regional Construction Emissions*, incorporation of Mitigation Measure AQ-1 would reduce VOC emissions to less than significant.

Table 7 Mitigated Maximum Daily Regional Construction Emissions

Construction Phase	Pollutants (lbs./day) ^{1, 2}					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Year 2030						
P4.2 Building Construction, P4.2 Paving, P4.2 Architectural Coating, and P4.2 Finishing and Landscaping	22	17	35	<1	4	1
Impact Analysis						
Maximum Daily Construction Emissions	22	17	35	<1	4	1
South Coast AQMD Regional Significance Threshold	75	100	550	150	150	55
Significant?	No	No	No	No	No	No

Source: CalEEMod Version 2022.1; South Coast AQMD 2023.

3. ENVIRONMENTAL EVALUATION

Notes: Highest winter or summer emissions are reported. See Appendix B.

1. Includes implementation of fugitive dust control measures required by South Coast AQMD under Rule 403, including watering disturbed areas a minimum of two times per day, reducing speed limit to 25 miles per hour on unpaved surfaces, and street sweeping with Rule 1186–compliant sweepers. Includes Mitigation Measure AQ-1, which requires super-compliant VOC paints for all coating phases. Only the construction phase requiring VOC mitigation is shown, as the remaining phases do not exceed applicable VOC regional thresholds.
2. Based on the preliminary information provided by the City. Where specific information regarding proposed project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by South Coast AQMD of construction equipment.

Long-Term Operation-Related Air Quality Impact

Less-Than-Significant 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). Implementation of the proposed project would develop a residential community and the primary source of long-term criteria air pollutant emissions generated by the proposed project would be mobile emissions from project-generated vehicle trips. Based on the traffic study and Institute of Transportation Engineers (ITE) 12th-edition trip generation rates, the proposed project would generate approximately a net increase of 386 daily trips (Appendix I).¹

As shown in Table 8, *Maximum Daily Regional Operational Phase Emissions*, the net increase in air pollutant emissions generated by proposed project operation-related activities would be less than their respective South Coast AQMD regional significance threshold values. Projects that do not exceed the South Coast AQMD regional significance thresholds would not result in an incremental increase in health impacts in the SoCAB from project-related increases in criteria air pollutants. Therefore, buildout of the proposed project would not result in a substantial increase in operation-phase emissions compared to existing conditions. Impacts to the regional air quality associated with operation of the proposed project would be less than significant.

¹ Average daily trips for the existing industrial uses was based on General Light Industrial (Land Use 110) and for proposed residential uses was based on Multifamily Housing Low Rise (Land Use 220) and Affordable Housing Income Limits (Land Use 223) from ITE *Trip Generation Manual* (12th ed.).

3. ENVIRONMENTAL EVALUATION

Table 8 Maximum Daily Regional Operational Phase Emissions

Source	Maximum Daily Emissions (lbs./day)					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Mobile ¹	5	2	39	<1	10	3
Area	18	<1	16	<1	<1	<1
Energy	0	0	0	0	0	0
Proposed Project Maximum Daily Emissions	23	2	55	<1	10	3
Existing Condition Maximum Daily Total Emissions	15	6	55	<1	10	3
Net Emissions	8	-4	<1	<1	<1	<1
South Coast AQMD Regional Threshold	55	55	550	150	150	55
Exceeds Regional Threshold?	No	No	No	No	No	No

Source: CalEEMod Version 2022.1. South Coast AQMD 2023. Appendix B.

Notes: Highest winter or summer emissions are reported.

lbs. = pounds

1. Based on LLG Traffic Analysis (Appendix I) and ITE trip rates (ITE 2025).

Impact AIR-1: Short-term emissions from construction of the proposed project would exceed South Coast AQMD's threshold criteria and cumulatively contribute to the nonattainment designations in the SoCAB.

Mitigation Measure AQ-1: To minimize emissions of volatile organic compounds (VOCs) during construction activities, the project applicant shall ensure that the construction contractor uses architectural coatings, paints, and finishes that have a VOC content lower than required under Rule 1113 (i.e., Super-Compliant paints). The construction contractor shall also use precoated/natural-colored building materials, where feasible. Use of low-VOC or zero-VOC paints (i.e., Super-Compliant paints) and the spray method shall be identified as a note on architectural building plans and verified by the City's Building Official or their designee during construction.

Significance with Mitigation: With incorporation of Mitigation Measure AQ-1, short-term emissions from construction of the proposed project would not exceed South Coast AQMD's threshold criteria and therefore would not cumulatively contribute to the nonattainment designations in the SoCAB.

c) *Would the proposed project expose sensitive receptors to substantial pollutant concentrations?*

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Less-Than-Significant Impact with Mitigation Incorporated. 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.

Localized Construction Impacts

Construction LSTs

Localized significance thresholds (LSTs) are based on the California AAQS, which are the most stringent AAQS to provide a margin of safety in the protection of public health and welfare. They are designated to protect sensitive receptors most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and people engaged in strenuous work or exercise. The screening-level construction LSTs are based on the size of the project site, distance to the nearest sensitive receptor, and Source Receptor Area (SRA). The nearest offsite sensitive receptors are the Jesus' Hands Montessori Preschool approximately 130 feet to the west along Craig Avenue and the residences approximately 60 feet south of the project along Franklin Street.

According to the LST methodology, the screening-level LSTs are limited to projects that are five acres or smaller in size and eight hours of operation per day (South Coast AQMD 2008a). The project site is large and involves multiple construction activities with overlapping phases occurring simultaneously. Additionally, the Buena Park Municipal Code allows for longer construction hours from Monday to Saturday 7am-8pm. Therefore, air dispersion modeling was conducted using the USEPA AERMOD, Version 13.0.0, to evaluate construction emissions. To assess more realistic average use of equipment on-site, construction was modeled for 5-day work week schedule and default CalEEMod daily hours of operation for equipment.

Table 9, *Unmitigated Localized Construction Emissions for PM₁₀ and PM_{2.5}*, and Table 10, *Unmitigated Localized Construction Emissions for CO and NO_x*, show that maximum mass emissions generated by certain construction activities would exceed the construction LSTs threshold for 1-hour NO_x. Thus, construction activities associated with the proposed project could generate emissions that would expose receptors to substantial concentrations of criteria air pollutants, and localized air quality impacts are considered potentially significant.

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Table 9 Unmitigated Localized Construction Emissions for PM₁₀ and PM_{2.5}

Construction Scenario	24-Hour Concentrations		Annual Average Concentration
	PM ₁₀ (µg/m ³)	PM _{2.5} (µg/m ³)	PM ₁₀ (µg/m ³)
P1 Demolition, P1 Demolition Debris On-Site Reprocessing, and Site Preparation	7.1	2.8	0.8
P2 Rough Grading	2.4	1.0	0.3
P3 Fine Grading, P3 Utility Trenching, and P4.1 Building Construction 2027	5.3	2.4	0.5
P3 Fine Grading, P3 Utility Trenching, and P4.1 Building Construction 2028	5.2	2.3	0.5
P4.1 Building Construction and P4.2 Building Construction 2028	0.4	0.4	0.0
P4.1 Building Construction and P4.2 Building Construction 2029	0.4	0.3	0.0
P4.1 Building Construction, P4.2 Building Construction, P4.1 Paving, P4.1 Architectural Coating, and P4.1 Finishing and Landscaping	0.5	0.5	0.0
P4.2 Building Construction 2029	0.1	0.1	0.0
P4.2 Building Construction 2030	0.1	0.1	0.0
P4.2 Building Construction, P4.2 Paving, P4.2 Architectural Coating, and P4.2 Finishing and Landscaping	0.2	0.2	0.0
South Coast AQMD LST Significance Thresholds	10.4	10.4	1.0
Exceeds Threshold?	No	No	No

Source: CalEEMod Version 2022.1; AERMOD v.13.0.0; South Coast AQMD 2008a, 2023.

Notes: See Attachment D in Appendix B for full construction LSTs analysis.

µg/m³ – micrograms per cubic meter

1. Based on maximum exposed individual receptor for each area source associated with individual and overlapping construction phases.

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Table 10 Unmitigated Localized Construction Emissions for CO and NO_x

Construction Scenario	1-Hour Concentrations		8-Hour Concentration	Annual Average Concentration
	CO (ppm)	NO _x (ppm)	CO (ppm)	NO _x (ppm)
P1 Demolition, P1 Demolition Debris On-Site Reprocessing, and Site Preparation	4.4	0.17	4.1	0.02
P2 Rough Grading	4.1	0.15	4.0	0.02
P3 Fine Grading, P3 Utility Trenching, and P4.1 Building Construction 2027	4.3	0.25	4.1	0.02
P3 Fine Grading, P3 Utility Trenching, and P4.1 Building Construction 2028	4.3	0.24	4.1	0.02
P4.1 Building Construction and P4.2 Building Construction 2028	4.2	0.16	4.0	0.02
P4.1 Building Construction and P4.2 Building Construction 2029	4.2	0.15	4.0	0.02
P4.1 Building Construction, P4.2 Building Construction, P4.1 Paving, P4.1 Architectural Coating, and P4.1 Finishing and Landscaping	4.2	0.18	4.0	0.02
P4.2 Building Construction 2029	4.1	0.11	4.0	0.02
P4.2 Building Construction 2030	4.1	0.11	4.0	0.02
P4.2 Building Construction, P4.2 Paving, P4.2 Architectural Coating, and P4.2 Finishing and Landscaping	4.1	0.13	4.0	0.02
South Coast AQMD LST Significance Thresholds	20.0	0.18	9.0	0.03
Exceeds Threshold?	No	Yes	No	No

Source: CalEEMod Version 2022.1; AERMOD v.13.0.0; South Coast AQMD 2008a, 2023.

Notes: See Attachment D in Appendix B for full construction LSTs analysis.

ppm – parts per million

1. Based on maximum exposed individual receptor for each area source associated with individual and overlapping construction phases.

As demonstrated in Table 11, *Mitigated Localized Construction Emissions for CO and NO_x*, with the implementation of Mitigation Measure AQ-2, the mass emissions generated by the proposed project would not result in concentration levels exceeding the construction LSTs threshold for 1-hour NO_x. Accordingly, localized construction impacts would be less than significant with incorporation of Mitigation Measure AQ-2. This mitigation measure stipulates the use of Tier 4 Final for all off-road construction equipment for engines of 25 horsepower or more.

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Table 11 Mitigated Localized Construction Emissions for CO and NO_x

Construction Scenario	1-Hour Concentrations		8-Hour Concentration	Annual Average Concentration
	CO (ppm)	NO _x (ppm)	CO (ppm)	NO _x (ppm)
P3 Fine Grading, P3 Utility Trenching, and P4.1 Building Construction 2027	4.4	0.12	4.1	0.02
P3 Fine Grading, P3 Utility Trenching, and P4.1 Building Construction 2028	4.4	0.12	4.1	0.02
South Coast AQMD LST Significance Thresholds	20.0	0.18	9.0	0.03
Exceeds Threshold?	No	No	No	No

Source: CalEEMod Version 2022.1; AERMOD v.13.0.0; South Coast AQMD 2008a, 2023.

Notes: See Attachment D in Appendix B for full construction LSTs analysis.

ppm – parts per million

1. Based on maximum exposed individual receptor for each area source associated with individual and overlapping construction phases. Includes Mitigation Measure AQ-2, which requires all off-road construction equipment to be fitted with engines that meet the USEPA Tier 4 Final emissions standards for off-road equipment with engines 25 horsepower or higher during all site development phases, including demolition, site preparation, grading and related earthmoving activities. Only the construction phases requiring NO_x mitigation are shown, as the remaining phases do not exceed applicable South Coast AQMD LST significance thresholds.

Construction Health Risk

The proposed project would elevate concentrations of TACs (i.e., diesel particulate matter [DPM]) in the vicinity of sensitive land uses during temporary construction activities that would use off-road equipment operating on-site, and at different levels depending on the type of activity. As described previously, the nearest off-site sensitive receptors are the Jesus' Hands Montessori Preschool approximately 130 feet to the west along Craig Avenue and the residences approximately 60 feet south of the project along Franklin Street.

A site-specific construction health risk assessment (HRA) of TACs was prepared to quantify potential health risk emissions during construction (see Appendix B). The results of the analysis are shown in Table 12, *Unmitigated Construction Risk Summary*, and demonstrate that construction activities associated with the proposed project would exceed the South Coast AQMD thresholds at the Maximum Exposed Individual Resident (MEIR) location.

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Table 12 Unmitigated Construction Risk Summary

Receptor	Cancer Risk (per million)	Chronic Hazards
Maximum Exposed Individual Resident (MEIR) ¹	19	<0.1
Maximum Exposed School Receptor: Jesus' Hands Montessori Preschool ²	4	<0.1
South Coast AQMD Threshold	10	1.0
Exceeds Threshold?	Yes	No

Source: Appendix B.

1. In accordance with the latest OEHHA guidance, the calculated total cancer risk conservatively assumes that the risk for the MEIR consists of a pregnant woman in the third trimester that subsequently gives birth to an infant during the approximately 3.77-year construction period. Therefore, calculated risk values for age groups from third trimester through 2 years of age were multiplied by a factor of 10 and age groups from 2 years of age through 9 years of age were multiplied by a factor of 3.

2. The calculated risk values for the student receptors were multiplied by a factor of 3.

The results of the HRA are based on the maximum receptor concentration over a 3.77-year construction exposure duration for receptors.

- Cancer risk for the MEIR, the single-family residence adjacent to the west of the project site, from construction activities related to the proposed project were calculated to be 19 in a million, which would exceed the 10 in a million-significance threshold.
- Cancer risk for the maximum exposed off-site preschool receptor from construction activities would be 4 in a million and would not exceed the 10 in a million-significance threshold.
- For non-carcinogenic effects, the chronic hazard index identified for each toxicological endpoint totaled less than one for all the off-site sensitive receptors. Therefore, chronic non-carcinogenic hazards are less than significant.

Because cancer risk for the MEIR would exceed the South Coast AQMD significance thresholds, Mitigation Measure AQ-2 would be necessary to reduce impacts to less than significant levels. This mitigation measure stipulates the use of Tier 4 Final for all off-road construction equipment for engines 25 horsepower or more.

As shown in Table 13, *Mitigated Construction Risk Summary*, incorporation of Mitigation Measure AQ-2 would reduce calculated risk at MEIR to below the South Coast AQMD's cancer risk significance threshold of 10 in one million. Additionally, the already-less-than-significant cancer risk and chronic hazard impacts at the maximum exposed preschool receptor would be further reduced below the significance thresholds with implementation of Mitigation Measure AQ-2. Accordingly, the proposed project would not expose off-site sensitive receptors to substantial

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concentrations of toxic air contaminant emissions during construction, and impacts would be less than significant with mitigation incorporated.

Table 13 Mitigated Construction Risk Summary

Receptor	Cancer Risk (per million)	Chronic Hazards
MEIR ²	4	<0.1
South Coast AQMD Threshold	10	1.0
Exceeds Threshold?	No	No

Source: Appendix B.

1 Includes Mitigation Measure AQ-2, which requires all off-road construction equipment to be fitted with engines that meet the USEPA Tier 4 Final emissions standards for offroad equipment with engines 25 horsepower or higher during all site development phases, including demolition, site preparation, grading and related earth-moving activities.

2 In accordance with the latest OEHHA guidance, the calculated total cancer risk conservatively assumes that the risk for the MEIR consists of a pregnant woman in the third trimester that subsequently gives birth to an infant during the approximately 3.77-year construction period. Therefore, calculated risk values for age groups from third trimester through 2 years of age were multiplied by a factor of 10 and age groups from 2 years of age through 9 years of age were multiplied by a factor of 3.

Localized Operational Impacts

Operation LSTs

Because the installation and use of stationary source equipment is not proposed as part of the project, 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 would involve development of 281 residential units and does not fall within these categories of uses. Localized air quality impacts related to operation-related emissions would be less than significant and no mitigation measures are necessary.

Carbon Monoxide Hotspots

Areas of vehicle congestion have the potential to create pockets of CO called hotspots. These pockets have the potential to exceed the state one-hour standard of 20 ppm or the eight-hour standard of 9 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. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds.

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The SoCAB has been designated attainment under both the national and California AAQS for CO. under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection to more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—in order to generate a significant CO impact (Bay Area Air District 2023). Based on the traffic study, the closest intersection with the maximum turning volumes after buildout would be at Beach Boulevard and Imperial highway with 6,787 PM peak turning volumes (Figure 19A in Appendix I). Therefore, the proposed project would generate traffic volumes below the CO hot spot screening criteria and would not have the potential to substantially increase CO hotspots at intersections in the vicinity of the project site. Impacts would be less than significant, and no mitigation measures are necessary.

Impact AIR-2: Construction activities associated with the proposed project could generate emissions that would expose receptors to substantial concentrations of criteria air pollutants and health risk impacts.

Mitigation Measure AQ-2: The project applicant’s construction contract shall use construction equipment rated by the United States Environmental Protection Agency (USEPA) as having Tier 4 final or higher exhaust emission limits for off-road equipment with engines 25 horsepower or higher, in use for over 20 hours, during all site development phases, including demolition, site preparation, grading and related earthmoving activities. If Tier 4 final equipment is not commercially available, the contractor may apply other available technologies available for construction equipment such that it would achieve a comparable reduction in NO_x and PM emissions comparable to that of Tier 4 construction equipment. For purposes of this mitigation measure, “commercially available” shall mean the availability of Tier 4 final engines similar to the availability for other large-scale construction projects in the city occurring at the same time and taking into consideration factors such as (i) potential significant delays to critical-path timing of construction and (ii) geographic proximity to the project site of Tier 4 final equipment. Where such equipment is not commercially available, as demonstrated by the construction contractor, Tier 3 equipment retrofitted with a California Air Resources Board’s Level 3 Verified Diesel Emissions Control Strategy (VDECS) shall be used.

Requirements for off-road equipment:

- Prior to construction, the project applicant shall ensure that all demolition and grading plans clearly show the requirement for United States Environmental Protection Agency Tier 4 final or higher emissions standards for off-road, diesel-powered construction equipment with more than 25 horsepower in use over 20 hours.

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- During construction, the construction contractor shall maintain a list of all operating off-road equipment in use over 20 hours on the construction site for verification by the Buena Park Building Division.
- The construction equipment list shall state the makes, models, Engine Identification Numbers, Engine Family Numbers, and numbers of off-road construction equipment on-site.
- To the extent that equipment is available and cost-effective, contractors shall use electric, hybrid, or alternate-fueled off-road construction equipment.
- Contractors shall use electric construction tools, such as saws, drills, and compressors, where grid electricity is available.
- Construction contractors shall also ensure that all nonessential idling of construction equipment is restricted to 5 minutes or less in compliance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9.
- All sub-contracts and construction documents shall identify that all non-essential idling of construction equipment is restricted to 5 minutes or less in compliance with California Air Resources Board Rule 2449. The construction contractor is responsible for ensuring that this requirement is met.

Significance with Mitigation: With incorporation of Mitigation Measure AQ-2, short-term emissions from construction of the proposed project would not expose receptors to substantial concentrations of criteria air pollutants and toxic air contaminants. Accordingly, localized construction and health risk impacts would be less than significant with mitigation incorporated.

d) *Would the proposed project 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 or damage to business or property. The provisions of this rule shall not apply to odors emanating from

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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 development of 281 residential units. These types of improvements would not fall within the aforementioned land uses and no operational odors are anticipated. Emissions from construction equipment, such as diesel exhaust and from VOCs associated with architectural coatings and paving activities, may generate odors. However, these odors would be temporary, intermittent, and are not expected to affect a substantial number of people. In addition, land uses accommodated under the proposed project would be subject to South Coast AQMD Rule 402, which would contribute to minimizing odor-related nuisances. Therefore, odor impacts would be less than significant and no mitigation measures are necessary.

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IV. Biological Resources

Would the project:

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

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

Less-Than-Significant Impact. Special-status species include those listed as endangered or threatened under the federal Endangered Species Act or California Endangered Species Act, species otherwise given certain designations by the California Department of Fish and Wildlife, and plant species listed as rare by the California Native Plant Society.

According to the U.S. Fish and Wildlife Service, critical habitat for threatened species and endangered species mapper, the project site and surrounding area are outside of any federally designated critical habitat (USFWS 2025a). However, the City of Buena Park, including the project site, is within the area of the Orange County Transportation Authority Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP), which provides a comprehensive, countywide framework for conserving sensitive habitats and species in relation to transportation improvements (CDFW 2025a). The project site is not identified as part of a reserve, mitigation, or conservation area under the plan. Further, the project site is currently developed and has been previously disturbed by commercial/industrial buildings, off-street parking, solar canopies, and landscaping, and lacks the biological resources that would support covered or special-status species identified in the NCCP/HCP. The construction of the proposed project would be limited to areas previously disturbed. Therefore, the proposed project would not impact any candidate, sensitive, or special-status species, and impacts would be less than significant.

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

Less-Than-Significant-Impact. No federally designated critical habitat exists on or in the vicinity of the project site (USFWS 2025a). The National Wetlands Mapper maintained by the US Fish and Wildlife service identified a riverine, Brea Creek, adjacent to the project site to the south (USFWS 2025b). However, the proposed project does not include any off-site improvements that may impact this riverine. The project site is fully developed. No natural drainages, riparian vegetation, or sensitive plant communities are present within the project site. Additionally, given the project's urban setting and existing separation from Brea Creek by intervening infrastructure and developed land, indirect impacts such as erosion, sedimentation, or pollutant runoff to the riverine feature are not anticipated. Implementation of standard construction best management practices required under the City's Municipal Separate Storm Sewer System permit would further ensure that no degradation of nearby sensitive habitats occurs. Thus, the project site does not contain any riparian habitat or other sensitive natural community, and the proposed project

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would not have the potential to impact the riverine habitat or other sensitive natural communities. Therefore, impacts to any riparian habitat or other sensitive natural communities would be less than significant.

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

Less-Than-Significant-Impact. As discussed in Section IV(b), the proposed project would not have the potential to impact the nearby riverine habitat or other sensitive natural communities. Given the project's urban setting and existing separation from Brea Creek by intervening infrastructure and developed land, indirect impacts such as erosion, sedimentation, or pollutant runoff to the riverine feature are not anticipated. Implementation of standard construction best management practices required under the City's Municipal Separate Storm Sewer System permit would further ensure that no degradation of nearby sensitive habitats occurs. Therefore, the proposed project would have less than significant impacts on state or federally protected wetlands.

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

Less-Than-Significant-Impact. The project site is in an urbanized area of Buena Park. The project site is fully developed with commercial/industrial buildings, off-street parking, solar canopies, and landscaping. No federally designated critical habitat exists on-site or in the vicinity (USFWS 2025a). The proposed project does not include any removal of or disturbance to trees and would not disturb nesting birds that are protected by the Migratory Bird Treaty Act. Furthermore, based on the California Department of Fish Wildlife's BIOS 6 viewer Terrestrial Connectivity layer, the project site has a score of one out of five, indicating the project site has "limited connectivity opportunity" (CDFW 2025b). Areas within "limited connectivity opportunity" are areas where land use may limit options for providing connectivity (e.g., agriculture, urban) or no connectivity importance has been identified in models (CDFW 2025c). The project site does not include and is not surrounded by any wildlife corridors, and there is no potential for the proposed new lighting to affect bird movement in the vicinity of the project site. Therefore, due to the disturbed and developed nature of the project site and surrounding urban development and the existing levels of lighting present, the project site is not an essential wildlife corridor. Additionally, the proposed project would be confined within the boundaries of the previously disturbed project site and would not result in any new impacts to wildlife corridors or native wildlife nursery sites. Therefore, a less-than-significant impacts would occur.

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

Less-Than-Significant Impact. As discussed in Section IV(b), the proposed project is not within a federally designated critical habitat or any riparian or wetland habitats. As discussed in

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Section 3.4(d), the project site has a “limited connectivity opportunity” and would not impact essential wildlife corridors. The proposed project would not impact any trees on the project site and conflict with any tree preservation policies. Physical impacts would be limited to the previously disturbed project site. Therefore, a less-than-significant impact would occur.

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

Less-Than-Significant Impact. The project site is developed with commercial/industrial buildings, off-street parking, solar canopies, and landscaping. As discussed in Section IV(a), the proposed project is in the MSHCP area (CDFW 2025a). However, the project site does not contain any MSHCP conservation species or habitats (Western Riverside County Regional Conservation Authority 2025) and, construction of the proposed project would be limited to areas previously disturbed as part of the campus development. Therefore, a less-than-significant impact would occur.

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V. Cultural Resources

Would the project:

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

DISCUSSION

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

No Impact. Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or the lead agency. Generally 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.

The project site is currently occupied with the Amway Nutrilite Center Campus; however, this structure does not qualify as a historical resource under CEQA. Additionally, the project site is not listed or eligible for listing in the California Register of Historical Resources, National Register of Historic Places, California State Historical Landmarks, or Points of Historical Interest or in a local

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register of historical resources (NPS 2025a, 2025b; OHP 2025a, 2025b). Therefore, there would be no impact to historical resources.

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

Less-Than-Significant Impact with Mitigation Incorporated. Implementation of the proposed project would result in the demolition of the existing buildings and ground disturbance for the proposed residential development. The proposed project would occur within the boundaries of the project site, which has already been developed; thus, the potential for discovery of archaeological resources would be minimal. Nevertheless, ground-disturbing activities from the proposed project have the potential to uncover unknown archaeological resources. Thus, the proposed project would require the implementation of Mitigation Measure CUL-1 to reduce impacts to archaeological resources to a less-than-significant level.

Impact CUL-1: Ground-disturbing activities from the proposed project have the potential to uncover unknown archaeological resources.

Mitigation Measure CUL-1: Prior to the commencement of grading activities, the project applicant shall ensure that an archaeologist who meets the Secretary of the Interior's (SOI) standards for professional archaeology has been retained for the proposed project and will be on-call during all grading and other significant ground-disturbing activities that would occur beneath the existing artificial fill. If archaeological resources are discovered during excavation and/or construction activities, construction shall stop within 50 feet of the find, and the qualified archaeologist shall be consulted to determine whether the resource requires further study. The archaeologist, in consultation with a Native American representative registered with the Native American Heritage Commission that is traditionally and culturally affiliated with the geographic area, as described in Public Resources Code Section 21080.3, shall make recommendations to the City to protect the discovered resources. Archaeological resources recovered shall be offered to a repository with a retrievable collection system and an educational and research interest in the materials, or a responsible public or private institution with a suitable repository willing to and capable of accepting and housing the resource. A report of findings documenting any data recovery shall be submitted to the City.

Significance After Mitigation: Implementation of Mitigation Measure CUL-1 would ensure that, in the event that archaeological resources are discovered during ground-disturbing activities, all ground distributing activities shall halt and a qualified archeologist would be retained to assess such findings and ensure the proper handling of resources in accordance with State and Federal requirements. Implementation of Mitigation Measure CUL-1 would reduce impacts to archaeological resources to a less-than-significant level.

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c) *Would the proposed project disturb any human remains, including those interred outside of dedicated cemeteries?*

Less-Than-Significant Impact. There are no cemeteries or known human burials at the project site, which is currently developed. However, the proposed project would include ground-disturbing activities with the limited potential to uncover previously unknown human remains.

If human remains are encountered during ground-disturbing activities, California Health and Safety Code Section 7050.5 requires that disturbance of the site shall halt and remain halted. The Orange County Coroner shall investigate the circumstances, manner, and cause of any death and recommend the treatment and disposition of the human remains to the person responsible for the excavation or to his or her authorized representative, in the manner provided in Section 5097.98 of the California Public Resources Code. The coroner is required to determine, within two working days of being notified of the discovery of the human remains, whether the remains are subject to their statutory authority. If the coroner determines that the remains are not subject to his or her authority or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC), who will contact the “most likely descendant.” The most likely descendant shall receive access to the discovery and would provide recommendations or preferences for treatment of the remains within 48 hours of accessing the discovery site. Disposition of human remains and any associated grave goods, if encountered, shall be treated in accordance with procedures and requirements in Sections 5097.94 and 5097.98 of the Public Resources Code, Section 7050.5 of the California Health and Safety Code, and CEQA Guidelines Section 15064.5.

Although soil-disturbing activities associated with the proposed project could result in the discovery of human remains, compliance with existing law would ensure that impacts would be less than significant.

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VI. Energy

Would the project:

Issues	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

The analysis in this section is based on information provided in Appendix B, of this Initial Study.

- *Air Quality, Greenhouse Gas Emissions, and Energy*, PlaceWorks, Inc., January 2026

DISCUSSION

- a) ***Would the proposed project 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

Electrical Energy

Electricity use during construction of the proposed project would vary during different phases of construction. Construction of the proposed project would not require electricity to power most construction equipment. Later construction phases could result in the use of electricity-powered equipment for interior construction and architectural coatings. It is anticipated that the majority of electric-powered construction equipment would be hand tools (e.g., power drills, table saws) and lighting, which would result in minimal electricity usage during construction activities. Therefore, project-related construction activities would not result in wasteful or unnecessary electricity demands, and impacts would be less than significant.

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Natural Gas Energy

It is not anticipated that construction equipment used for the proposed project would be powered by natural gas, and no natural gas demand is anticipated during construction. Therefore, impacts would be less than significant with respect to natural gas usage.

Transportation Energy

Transportation energy use during construction would come from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction employee vehicles. In addition, transportation energy demand would come from the use of off-road construction equipment. It is anticipated that the majority of off-road construction equipment, such as those used during demolition, demolition reprocessing, rough and fine grading, and utility trenching, would be gas or diesel powered.

The use of energy resources by vehicles and equipment would fluctuate according to the phase of construction and would be temporary. In addition, all construction equipment would cease operating upon completion of proposed project construction. Thus, impacts related to transportation energy use during construction would be temporary and would not require expanded energy supplies or the construction of new infrastructure.

Moreover, to limit wasteful and unnecessary energy consumption, the construction contractors are anticipated to minimize nonessential idling of construction equipment in accordance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9. Construction trips would also not result in unnecessary use of energy since the project site is centrally located in an urbanized and residential area of the city served by numerous regional freeways (e.g., Interstate-5 and State Route 39) that provide the most direct routes from various areas of the region. Thus, energy use during construction of the proposed project would not be considered inefficient, wasteful, or unnecessary. Impacts would be less than significant.

Long-Term Impacts During Operation

Operation of the proposed project would generate new demand for building electricity and natural gas on the project site. Operational use of energy would include heating, cooling, and ventilation of the proposed 281 residential units; water heating; operation of electrical systems, use of on-site equipment and appliances; and indoor/outdoor lighting.

Electrical Energy

The net increase in electricity consumption from the proposed project is shown in Table 14, *Operation-Related Electricity Consumption*.

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Table 14 Operation-Related Electricity Consumption

Land Use	Electricity (kWh/year)
Apartments Mid-Rise (Senior Affordable Apartments)	183,454
Condo/Townhouse High Rise (Townhomes)	418,276
Condo/Townhouse High Rise (Duets)	429,283
Pool House	4,198
Proposed Project Total	1,035,211
Existing Conditions (Industrial) Total	3,721,411
Net Difference	-2,686,200

Source: CalEEMod Version 2022.1; Appendix B.

Notes: kWh=kilowatt-hour

The electricity use per year is based on the proposed square footage of the buildings and parking areas.

The electricity for the proposed residential buildings accounts for the increase in electricity usage associated with fuel switching under all-electric project design.

Compared to the existing industrial uses on-site, the proposed project would generate less energy demand. Additionally, the proposed project would comply with the latest Building Energy Efficiency Standards and CALGreen standards and would include a photovoltaic (PV) system on-site. The 2025 Building Energy Efficiency Standards include PV system standards for residential land uses in addition to battery storage standards for multifamily residential uses of three stories or less. Compliance with the prescriptive standards would entail the installation of on-site PV systems and battery storage. The 2025 Building Energy Efficiency Standards also have performance standards as an alternative to the prescriptive standards pathway for residential. Although the performance standards pathway does not require installation of a PV system and where applicable, battery storage, it does require land uses that would opt for this compliance option to achieve an energy-efficiency performance of the “Standard Design Building.” The “Standard Design Building” represents the energy-efficiency performance of a project should it include all prescribed features (e.g., solar, battery storage) and no additional energy-efficiency features. Thus, proposed residential buildings that opt for the performance pathway would still achieve a similar level of energy efficiency as those that opt for compliance with the prescriptive pathway.

In addition to the proposed building energy efficiency, Southern California Edison (SCE) is required to comply with the state’s renewable portfolios standard (RPS), which mandates utilities to procure a certain proportion of electricity from eligible renewable and carbon-free sources and increasing the proportion through the coming years with an ultimate procurement requirement of 100 percent by 2045. The RPS requirements would support use of electricity by the proposed project that is generated from renewable or carbon-free sources. Overall, the proposed project would generally be consistent with the goals outlined in Appendix F of the CEQA Guidelines

3. ENVIRONMENTAL EVALUATION

regarding increasing energy efficiency, decreasing reliance on fossil fuels, and increasing renewable energy sources.

Overall, the proposed project would be consistent with the requirements of these energy-related regulations, which would decrease electricity use and increase renewable electricity, and would not result in wasteful or unnecessary electricity demands. Therefore, the proposed project would not result in a significant impact related to electricity for building use.

Natural Gas Energy

As shown in Table 15, *Operation-Related Natural Gas Consumption*, the natural gas demand by the new residential buildings would result in a net decrease of 15,838,045 kilo-British thermal (kBTU) units per year. The new residential buildings would be designed all-electric with individual condensers and one forced air unit (FAU)/air handler per unit. Compliance with the 2025 Building Energy Efficiency Standards would decrease overall reliance on fossil fuels and comply with the goals in Appendix F of the CEQA Guidelines. Therefore, operation of the proposed project would result in less-than-significant impacts with respect to natural gas usage.

Table 15 Operation-Related Natural Gas Consumption

Land Use	Natural Gas (kBTU/year)
Proposed Project Total	0
Existing Conditions Total	15,838,045
Net Difference	-15,838,045

Source: CalEEMod Version 2022.1; Appendix B.

Notes: kBTU=kilo-British thermal units

The proposed residential buildings are designed as all-electric. No natural gas service, infrastructure, or appliances are proposed as part of the proposed project.

Transportation Energy

The residential buildings would consume transportation energy during operations from the use of motor vehicles associated with residents and visitors to the new residences. The proposed project is anticipated to generate a net increase in 386 average daily vehicle trips compared to existing conditions (see Appendix I).

Fuel efficiency of vehicles after full buildout would, on average, be expected to improve compared to existing conditions, resulting in a lower per capita fuel consumption, assuming travel distances, travel modes, and trip rates remain the same. The improvement in fuel efficiency would be attributable to ongoing advancements in vehicle technology, market-driven shifts toward more efficient and alternative-fuel vehicles, and the gradual turnover of the vehicle fleet as older, less fuel-efficient vehicles are replaced with newer models. While land use development projects do not directly influence the fuel efficiency of vehicles available to residents and visitors, broader

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industry trends and consumer preferences continue to support increased availability of more fuel-efficient vehicles. As a result, future residents would likely have access to vehicles that consume less fuel on average, contributing to an overall reduction in fuel usage relative to existing conditions.

Additionally, electricity consumed in California is required to meet the increasing renewable energy mix requirements under the State's RPS, accelerated by SB 1020, so greater and greater proportions of electricity consumed for transportation energy demand envisioned under the proposed project would be generated from renewable energy sources rather than fossil fuels through 2045.

Specifically, the proposed project would include enhanced pedestrian and vehicular access to the project site. Dedicated landscaped open space areas between residential buildings, new crosswalks and pedestrian connections on-site, and new vehicle access points on Beach Boulevard and south from Darlington Avenue would help decrease transportation-related energy use and help promote active transportation modes (e.g., walking and bicycling).

As discussed in the Appendix I, the proposed project meets the City's screening criteria for evaluating vehicle miles traveled (VMT) impacts because the site is in a Transit Priority Area, is in a low VMT-generating zone, and includes affordable housing units. Therefore, the proposed project would be screened out of further VMT project-level assessment and would be considered to have a less-than-significant VMT impact (see Appendix I). Therefore, impacts would be less than significant with respect to operation-related fuel usage.

b) *Would the proposed project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

Less-Than-Significant Impact. This following impact analysis evaluates consistency of the proposed project with California's Energy Action Plan and Long-Term Energy Efficiency Strategic Plan.

Energy Action Plan

The Energy Action Plan was last updated in 2008 and was developed by the California Public Utilities Commission, California Energy Commission, and California Power Authority to create a unified State energy policy framework. It serves as one of the State's strategies for planning for reliable, affordable, and environmentally responsible energy procurement and supply. The Energy Action Plan further establishes a "loading order" in identifying priorities for statewide energy planning efforts, which translates into —first, prioritizing meeting existing demand with cost-effective energy efficiency and demand response efforts; then using renewable energy resources and distributed generation; and finally, meeting the remaining energy demand with renewable or otherwise "clean" fossil-fuel power generation resources (e.g., renewable natural gas). Other priorities identified in the Energy Action Plan but not directly related to local agencies include

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modernizing transmission and distribution infrastructure, enhancing reliability in electricity and natural gas markets, and ensuring affordable access to all Californians. Therefore, a project can be assessed for consistency with the Energy Action Plan by examining how the proposed development generally supports or conflicts with the strategies of the plan, such as promoting energy resource deployment consistent with the plan's loading order.

The proposed project would include electric vehicle (EV) infrastructure and an all-electric building design, which directly supports the goals of the Energy Action Plan by promoting clean energy use and improving energy efficiency. By eliminating the need for on-site fossil fuel combustion, the all-electric design aligns with strategies to transition to renewable electricity sources and decarbonize building operations. Additionally, the inclusion of EV infrastructure encourages the adoption of electric vehicles among residents and visitors, further reducing transportation-related emissions. Together, these features would help further CARB's goals for renewable energy production and the state's goal of transitioning to 100 percent carbon-free electricity. Therefore, the proposed project would be considered consistent with the Energy Action Plan strategies and impacts would be less than significant.

Long-Term Energy Efficiency Strategic Plan

The Long-Term Energy Efficiency Strategic Plan was last updated in 2011 and serves as the State's long-term roadmap to make energy efficiency a top priority in supporting California's grid harmonization and renewable energy integration efforts. The Long-Term Energy Efficiency Strategic Plan serves as a living strategic document for State and local agencies and emphasizes the integration of energy efficiency policies and measures into planning efforts as a critical component to advancing the objectives of the plan. Therefore, a project can be assessed for consistency with the Long-Term Energy Efficiency Strategic Plan by examining how its proposed development generally supports or conflicts with the strategies of the plan, such as green building standards and zero net energy readiness.

The proposed project incorporates a range of design features, including EV infrastructure and an all-electric building system, that align with and advance the goals of the state's long-term Energy Efficiency Strategic Plan. By replacing traditional systems such as gas-powered heating with all-electric HVAC systems, the proposed project would reduce overall energy consumption and operational emissions. Additionally, EV charging infrastructure encourages the adoption of low-emission transportation options among residents and visitors, further contributing to long-term reductions in transportation-related emissions. Therefore, the proposed project would be considered consistent with the Long-Term Energy Efficiency Strategic Plan strategies, and impacts would be less than significant.

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VII. Geology and Soils

Would the project:

Issues	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	☐	☐	☒	☐
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

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The analysis in this section is based in part on the following study, which is included in Appendix C of this Initial Study.

- *Geotechnical Reconnaissance*, Geocon, July 2024

DISCUSSION

- a) *Would the proposed project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*
- i. **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**
 - ii. **Strong seismic ground shaking?**
 - iii. **Seismic-related ground failure, including liquefaction?**
 - iv. **Landslides?**

Less-Than-Significant Impact. The project site is not within a state-designated Alquist-Priolo Earthquake Fault Zone (CGS 2024a; DOC 2022b) for surface fault rupture hazards. No Holocene-active or pre-Holocene faults with the potential for surface fault rupture are known to pass directly beneath the project site. The closest surface trace of an active fault to the site is the Whittier Fault, approximately 6.1 miles to the north. Other nearby active faults are the Newport-Inglewood Fault Zone, the East Montebello Fault, and the Chino Fault located approximately 10 miles southwest, 12 miles northwest, and 18 miles southwest of the project site, respectively. Therefore, the potential for surface rupture due to faulting beneath the project site is considered low. Impacts related to surface rupture would be less than significant.

However, the project site is located in the seismically active Southern California region and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of Southern California's many active faults. To avoid or minimize potential damage from seismic shaking, the proposed development would be built using standard engineering and seismic safety design techniques, including the seismic design parameters of the California Building Code (CBC), which regulates all building and construction projects and implements a minimum standard for construction that includes specific requirements for seismic safety. Impacts related to seismic shaking would be less than significant.

Liquefaction refers to loose, saturated sand, or gravel deposits that lose their load-supporting capability when subjected to intense shaking. Liquefaction potential varies based on three main contributing factors: 1) groundwater depth; 2) soil type; and 3) intensity and duration of ground shaking. According to the California Department of Conservation Earthquake Zones of Required Investigation Mapper, the proposed project is in an identified liquefaction zone (DOC 2022b). A

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liquefaction analysis was performed for the geotechnical report using the data collected from the project site and 2016 CBC seismic design parameters. The use of grading and conventional foundations for support of the proposed project is recommended. Further, the proposed project would be designed and constructed to withstand liquefaction potential consistent with the CBC. Impacts related to liquefaction would be less than significant with implementation of applicable building regulations and recommendations in the geotechnical report.

A landslide is a type of erosion in which masses of earth and rock move downslope as a single unit. Susceptibility of slopes to landslides and other forms of slope failure depend on several factors, which are usually present in combination and include steep slopes, condition of rock and soil materials, the presence of water, formational contacts, geologic shear zones, and seismic activity. According to the California Department of Conservation Earthquake Zones of Required Investigation Mapper, the project site is not in an area with the potential for earthquake-induced landslides (DOC 2022b). Therefore, the potential for earthquake-induced landslides at the site is considered low, and the impact would be considered less than significant.

The project would be constructed in accordance with the standard engineering practices in the CBC, as adopted by the City of Buena Park. A grading permit from the Buena Park Department of Public Works would be obtained prior to the issuance of a Public Works clearance. These standard practices would ensure that buildings on the site are designed to properly account for soils-related hazards. Therefore, with implementation of the standard permit condition, impacts related to fault rupture, seismic shaking, ground failure, and landslides would be less than significant.

b) *Would the proposed project result in substantial soil erosion or the loss of topsoil?*

Less-Than-Significant Impact. Erosion is a normal and inevitable geologic process whereby earthen materials are loosened, worn away, decomposed, or dissolved and moved from one place to another. Precipitation, running water, waves, and wind are all agents of erosion. Ordinarily, erosion proceeds imperceptibly, but when the natural equilibrium of the environment is changed, the rate of erosion can be greatly accelerated. This can create aesthetic as well as engineering problems on undeveloped sites. Accelerated erosion in an urban area can cause damage by undermining structures; blocking storm drains; and depositing silt, sand, or mud in roads and tunnels. Eroded materials can eventually be deposited in local waters, where the carried silt remains suspended in the water for some time, constituting a pollutant and altering the normal balance of plant and animal life.

Construction

Project-related construction activities would expose soil through excavation, grading, and trenching, and thus could cause erosion during heavy winds or storms. Construction projects of one acre or more (such as the project site) are regulated under the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities issued by the State Water Resources Control Board.

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Project applicants obtain coverage by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) estimating sediment risk from construction activities to receiving waters, and specifying best management practices (BMP) that would be incorporated into the construction plan to minimize stormwater pollution. Construction of the proposed project would be subject to the Statewide General Construction Permit and implementation of BMPs specified in the SWPPP. Construction activities would not generate substantial erosion. With implementation of BMPs, construction-phase soil erosion impacts would be less than significant.

Operation

The proposed project includes a combination of three-story residential buildings and a four-story multifamily apartment structure with enclosed parking and a surface parking lot, green spaces, and paved surfaces (such as drive aisles, driveways, and pedestrian paths). With the development of the proposed project, the project site would not contain exposed or bare soil that would have the potential for erosion. With the incorporation of stormwater infrastructure on-site and pervious landscaping, operation of the proposed project would not have a potential for soil erosion. Therefore, potential impacts related to potential for soil erosion would be less than significant.

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

Less-Than-Significant Impact. The topography at the project site is generally level, and the topography in the immediate site vicinity slopes very gently to the south-southwest. The site is not in an area identified as having potential for slope instability (CDMG 1998). The proposed project would not create new slopes. Thus, on- or off-site landslides would not occur. Hazards arising from liquefaction and landslides would be less than significant, as discussed in Sections a(iii) and a(iv).

- **Lateral Spreading.** Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. Lateral spreading hazards are most likely to occur adjacent to free faces such as streambanks. The Brea Creek Channel is located along the southern property line. However, given that the channel is lined with concrete, the potential for lateral spread is not anticipated to be significant constraint on developing the project site (Geocon 2024). Additionally, as described in Section 3.VII(a) above, impacts related to liquefaction on the project site would be less than significant with implementation of applicable building regulations and recommendations in the geotechnical report. Therefore, the proposed project would not expose people or residences to adverse effects associated with lateral spreading. Impacts would be less than significant.
- **Subsidence.** The project site is in an area of known ground subsidence (USGS 2024). Subsidence related to groundwater pumping commonly occurs in such small magnitudes and

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over such large areas that it is generally imperceptible at an individual locality. Accordingly, it affects only regionally extensive structures sensitive to slight elevation changes, such as canals and pipelines. The rate of elevation change is usually uniform over a large enough area that it does not result in differential settlements that would cause damage to individual buildings. Therefore, the potential for subsidence to adversely impact the proposed project is considered low.

- **Collapsible Soils.** Collapsible soils are typically geologically young, unconsolidated sediments of low density that may compress under the weight of structures. Since the project site is not over a groundwater basin, the risk of soil expansion and collapse is considered low. Therefore, impacts would be less than significant.

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

Less-Than-Significant-Impact. Expansive soils possess clay particles that react to moisture changes by shrinking when dry or swelling when wet. These soils have the potential to crack building foundations and, in some cases, structurally distress the buildings themselves. Damage to overlying structures is possible.

According to the geotechnical report (see Appendix C), laboratory testing indicated that the on-site soils had a low expansion potential. Thus, the risk of soil expansion and collapse is low, and the proposed project would not create substantial direct or indirect risks to life or property. Additionally, the proposed project would be constructed in accordance with the standard engineering practices in the CBC as adopted by the City of Buena Park. A grading permit from the Buena Park Department of Public Works would be obtained prior to the issuance of a Public Works clearance. These standard practices would ensure that the proposed project would be designed and constructed to minimize hazards due to expansive soils, and the soil conditions on-site would not be exacerbated by the project such that it would impact (or worsen) on- or off-site conditions. Therefore, impacts would be less than significant.

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

No Impact. The proposed project would not require the installation or use of a septic tank or alternative wastewater disposal system. Therefore, no impacts would result from soil conditions in relation to septic tanks or other on-site water disposal systems.

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

Less-Than-Significant Impact with Mitigation Incorporated. Paleontological resources or fossils are remains of ancient plants and animals that can provide scientifically significant information about the history of life on earth. This sensitivity is determined by rock type, history of the geologic unit in producing significant fossils, and fossil localities that are recorded from that unit. Based on a search of the University of California Museum of Paleontology database, Orange County contains 1,112 paleontological resources. However, the age of the geologic unit underlying the project site is Holocene, and paleontological resources of that age would be unlikely in the county. Only 1 of the 1,112 known paleontological resources in the county was in a Holocene-age geological unit (UCMP 2025). The project site was previously developed and involves limited ground disturbance. Though paleontological resources are not expected, it is possible that unknown paleontological resources could be discovered during project construction. Implementation of Mitigation Measure GEO-1 would ensure that impacts to unknown paleontological resources would be less than significant.

Impact GEO-1: Ground-disturbing activities may uncover previously unknown paleontological resources.

Mitigation Measure GEO-1: In the event that fossils or fossil locality deposits are discovered during construction, excavations within 50 feet of the fossil locality shall be temporarily halted until removal of the fossil localities. The City shall notify a qualified paleontologist to investigate its significance. If the fossil locality is determined to be significant by the qualified paleontologist, the paleontologist shall work with the City to follow accepted professional standards, such as further testing for evaluation or data recovery, as necessary. The paleontologist shall notify the appropriate agencies to determine procedures that would be followed before construction is allowed to resume at the location of the find. If the project proponent determines that avoidance is not feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of the project based on the qualities that make the resource important.

Significance After Mitigation: Implementation of Mitigation Measure GEO-1 would ensure that impacts to unknown paleontological resources would be less than significant.

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VIII. Greenhouse Gas Emissions

Would the project:

Issues	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

The analysis in this section is based on information provided in Appendix B, of this Initial Study.

- *Air Quality, Greenhouse Gas Emissions, and Energy*, PlaceWorks, Inc., January 2026

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 20th and 21st centuries. Other GHG identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N₂O), sulfur hexafluoride (SF₆), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons.²

Information on manufacture of cement, steel, and other “life cycle” emissions that would occur as a result of the project are not applicable and are not included in the analysis.³ Black carbon

² 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.

³ 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 proposed project is not known, the origin of the raw materials purchased is not known, and manufacturing information for those

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emissions are not included in the GHG analysis because the California Air Resources Board (CARB) does not include this short-lived climate pollutant in the state's Senate Bill 32 (SB 32) and Assembly Bill 1279 (AB 1279) inventory but treats it separately.⁴ A background discussion on the GHG regulatory setting and GHG modeling can be found in Appendix B to this Initial Study.

Methodology

The Buena Park Climate and Adaptation Plan (CAAP) is a qualified GHG reduction plan. However, emissions associated with the project development are not included in GHG forecast in the CAAP because the project site is currently zoned Light Industrial (ML) and designated Light Industrial under the General Plan, and implementation of the proposed project would require a zone change to Medium-Density Multi-Family (RM-20) and a General Plan land use change to High-Density Residential (see Section 2.3.1, *Proposed Rezoning and General Plan Land Use Change*). Additionally, the CAAP checklist was not available at the time of drafting this Initial Study. Therefore, the proposed project's GHG emissions impacts are evaluated based on the South Coast AQMD Working Group's bright-line threshold for all land use types of 3,000 metric tons of CO₂-equivalent emissions (MTCO₂e).

DISCUSSION

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

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

As seen in Table 16, *Project-Related Operation GHG Emissions*, construction and operation of the proposed project would generate a net decrease of 1,378 MTCO₂e per year compared to existing conditions. Annual average construction emissions were amortized over 30 years and are included in the emissions inventory to account for one-time GHG emissions from the construction phase of the proposed project.

raw materials are also not known, calculation of life cycle emissions would be speculative. A life-cycle analysis is not warranted (LCI 2008).

⁴ Particulate matter emissions, which include black carbon, are analyzed in Section III, *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).

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Table 16 Project-Related Operation GHG Emissions

Source	GHG Emissions (MTCO ₂ e/Year)		
	Existing	Proposed Project	Net Difference
Mobile ¹	1,418	1,453	35
Area	8	5	-3
Energy	1,430	123	-1,307
Water	145	17	-128
Solid Waste	143	66	-77
Refrigerants	16	1	-15
30-Year Amortized Construction Emissions ²	—	116	—
Total	3,160	1,781	-1,378
South Coast AQMD Bright-Line Threshold	—	—	3,000
Exceeds Bright-Line Threshold?	—	—	No

Sources: CalEEMod v.2022.1; Appendix B.

Notes: MTons = metric tons; MTCO₂e = metric ton of carbon dioxide equivalent

1 Based on LLG Traffic Analysis (Appendix I) and ITE trip rates (ITE 2025).

2 Total construction emission are amortized over 30 years per South Coast AQMD methodology (South Coast AQMD 2008b).

Water demand, wastewater and solid waste generation, and energy demand for the project site would incrementally decrease compared to the existing facility; however, mobile emissions would slightly increase due to the net increase in daily vehicle trips associated with the proposed 281 residential units. As shown in Table 16, construction and operation of the proposed project would not generate emissions that exceed the bright-line threshold of 3,000 MTCO₂e per year (South Coast AQMD 2010), and emissions would decrease overall compared to existing conditions. Therefore, the proposed project's cumulative contribution to GHG emissions would be less than significant.

b) *Would the proposed project 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, the Southern California Association of Governments' (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and the City's CAAP. A consistency analysis with these plans is presented below.

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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. However, new regulations adopted by the state agencies outlined in the Scoping Plan result in GHG emissions reductions at the local level. As a result, local jurisdictions benefit from reductions in transportation emissions rates, increases in water efficiency in the building and landscape codes, and other statewide actions that affect a local jurisdiction's emissions inventory from the top down. Statewide strategies to reduce GHG emissions include the Low Carbon Fuel Standard (LCFS) and changes in the corporate average fuel economy standards (e.g., California Advanced Clean Cars program).

As shown in Table 16, the proposed project would result in a reduction in GHG emissions compared to the baseline conditions. The proposed project would be designed as all-electric and include electric vehicle (EV) charging infrastructure. Additionally, the proposed project would include affordable housing, which supports reduced vehicle miles traveled (VMT) and equitable access to housing in locations served by existing infrastructure. These project design features would be consistent with the CARB's 2022 Scoping Plan by supporting statewide strategies to reduce long-term GHG emissions in the transportation and building sectors.

Furthermore, project construction-related GHG emissions would be reduced from compliance with statewide measures pertaining to on-road vehicles, off-road equipment, and transportation fuels that have been adopted since AB 32, SB 32, and AB 1279 were adopted. Therefore, the proposed project would not obstruct implementation of the 2022 Scoping Plan, and impacts would be less than significant. No mitigation measures are necessary.

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 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 GHG

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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 described in Section XIV, *Population and Housing*, the proposed project would serve the existing and planned community and aid the City in meeting its Regional Housing Needs Assessment (RHNA) shortfall. The proposed project also includes design features such as common space amenities (e.g., open space lawn and BBQ/seating areas) and improved pedestrian and vehicular access to the project site. These features would promote alternative means of transport as well as active transportation within the community, such as walking or bicycling, thereby reducing VMT.

As discussed in the traffic study in Appendix I, the proposed project meets the City's screening criteria for evaluating VMT impacts because the site is in a Transit Priority Area, is in a low VMT-generating zone, and includes affordable housing units. Therefore, the proposed project would be screened out of further VMT project-level assessment and would be considered to have a less than significant VMT impact (see Appendix I). Accordingly, the proposed project would not interfere with SCAG's ability to implement the regional strategies in the SCS, and impacts would be less than significant.

Buena Park Climate Action & Adaptation Plan

Adopted by the City in September 2025, the CAAP establishes a roadmap for evaluating and mitigating GHG emissions by providing an emissions inventory, emissions reduction goals, and strategies for reducing community-wide emissions (Buena Park 2025a). The CAAP aligns with California's ambitious GHG reduction mandates and outlines a clear path for meeting the City's 2030 and 2045 targets. The 2030 target is consistent with SB 32 (i.e., to reduce GHG emissions 40 percent below 1990 levels by 2030), and the 2045 target is consistent with AB 1279 (i.e., to reduce GHG emissions to at least 85 percent below 1990 levels by 2045). The CAAP also clearly defines an approach for ongoing implementation and monitoring to ensure accountability and facilitate any adjustments that may be necessary as the plan progresses.

The CAAP is organized into eight opportunity areas that encompass various GHG reduction and resilience strategies: (1) on-road transportation, (2) energy and the built environment, (3) off-road equipment, (4) water and wastewater, (5) solid waste, (6) people and community, (7) natural and urban lands, and (8) municipal.

As demonstrated in Table 17, *Buena Park CAAP Consistency Analysis*, the proposed project would be consistent with the applicable GHG reduction measures and would not interfere with implementation of the City's CAAP. Additionally, compared to existing conditions, the proposed project would result in a reduction in GHG emissions. Impacts would be less than significant.

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Table 17 Buena Park CAAP Consistency Analysis

Applicable GHG Reduction Measures	Consistency with CAAP
On-Road Transportation (T)	
T1 Encourage Transition to Electric Vehicles	Consistent. Pursuant to the provisions of the Buena Park Municipal Code and the most current California Green Building Standards Code (CALGreen) (Title 24, California Code of Regulations, Part 11), the proposed project would provide 231 electric vehicle (EV)-capable spaces out of a total of 567 parking spaces (see Table 3, <i>Proposed Parking</i>). Providing EV-capable spaces for future residents would support the transition to electric vehicles by facilitating future installation of charging infrastructure, thereby reducing reliance on gasoline-powered vehicles.
T2 Enhance Active Transportation Environment	Consistent. The proposed project would include enhanced pedestrian and vehicular access to the project site. Dedicated landscaped open space areas between residential buildings, new crosswalks and pedestrian connections on-site, and new vehicle access points on Beach Boulevard and south from Darlington Avenue would help decrease transportation-related energy use and help promote active transportation modes (e.g., walking and bicycling).
T3 Reduce Single-Occupancy Vehicle Trips	Consistent. Based on the traffic study, the project site is near the Buena Park Metrolink Station and within a Transit Priority Area and Major Transit Stop (Appendix I). The proposed project would also enhance pedestrian and vehicular access to the project site, which would help promote active transportation modes. Transit-oriented design and safe, convenient pedestrian pathways would encourage residents to use alternative modes of transportation, thereby reducing reliance on single-occupancy vehicles and associated vehicle trips.
T4 Optimize Land Use to Minimize Commute Distances	Consistent. Based on the traffic study, the project site is near the Buena Park Metrolink Station and in a Transit Priority Area and Major Transit Stop (Appendix I). By situating the project site near transit, providing open space amenities, and integrating pedestrian and bicycle networks, the design encourages residents to live, work, and access services within close proximity. This compact,

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Table 17 Buena Park CAAP Consistency Analysis

	connected layout would optimize the land use by promoting efficient, multi-modal travel and reducing the need for long vehicle trips.
T5 Incentivize Use of Public Transit	Consistent. By situating the project near transit and providing pedestrian and bicycle connections, the design makes public transit more convenient and accessible for future residents. Therefore, these design features would help incentivize residents to choose transit over single-occupancy vehicle trips.
Energy and the Built Environment (E)	
E1 Increase Energy Efficiency in Buildings	Consistent. The new residential buildings would be constructed using green building practices, including those of the latest California Building Energy Efficiency Standards and CALGreen. New buildings in compliance with these standards would generally have greater energy efficiency than existing buildings.
E2 Decarbonize and Electrify Buildings	Consistent. The new residential buildings would be constructed using green building practices, including those of the latest California Building Energy Efficiency Standards and CALGreen. Moreover, the proposed project would include an all-electric building design, which aligns with this strategy to transition to renewable electricity sources and decarbonize building operations.
E3 Increase Renewable Energy Generation and Storage	Consistent. The new residential buildings would be constructed using green building practices, including those of the latest California Building Energy Efficiency Standards and CALGreen. Moreover, the proposed project would include an all-electric building design and a PV system on-site, which aligns with this strategy to transition to renewable electricity sources and storage.
E4 Procure Zero-Carbon Electricity	Consistent. The new residential buildings would be constructed using green building practices, including those of the latest California Building Energy Efficiency Standards and CALGreen. Moreover, the proposed project would include an all-electric building design and a PV system on-site, which aligns with this strategy to procure zero-carbon electricity.
E5 Increase Reflectance and Cool Buildings	Consistent. The new residential buildings would be constructed using green building practices, including those of the latest California Building Energy

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Table 17 Buena Park CAAP Consistency Analysis

	Efficiency Standards and CALGreen. While the proposed project does not currently incorporate specific surface reflectance or cool building design features, it does not preclude the future installation or implementation of such features, should they be pursued at a later date.
Off-Road Equipment (OR)	
OR1 Increase Electric and Zero-Emissions Off-Road and Landscaping Equipment Adoption	Consistent. The City has adopted Ordinance No. 1748, which phases out the use of gas-powered landscaping equipment and transition to electric alternatives. Operation and maintenance of landscaping throughout the project site would not conflict with the City's ordinance.
Water and Wastewater (W)	
W1 Reduce Water Consumption	Consistent. The proposed project would be required to comply with the provisions of CALGreen, which has requirements for indoor water use reduction and site irrigation conservation. Additionally, the City's Municipal Code includes regulations aimed at reducing water consumption and promoting water efficiency. The City's Water Conservation and Water Supply Shortage Program (Chapter 13.28) establishes conservation requirements to help reduce overall water use, prevent waste, and maximize efficient use of water supplies. The City's Water Efficient Landscape Ordinance (Chapter 13.30) also provides requirements for water-efficient design, installation, and management consistent with state landscape water efficiency goals.
W2 Increase Water Reuse and Recycling	Consistent. The proposed project would be required to comply with California regulations for water reuse and recycling, including the California Water Code and the provisions of CALGreen, which supports the use of water reuse and recycling systems. Compliance with these regulations would support water conservation and the efficient use of non-potable water.
Solid Waste (SW)	
SW1 Reduce Waste to Landfills	Consistent. As mentioned under impact d of Section XIX, <i>Utilities and Service Systems</i> , the proposed project would be required to collect and dispose of solid waste in accordance with the City's solid waste management system. Solid waste collection services

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Table 17 Buena Park CAAP Consistency Analysis

	<p>in Buena Park are provided by the City’s franchised waste hauler, and refuse is transported to regional landfill facilities with adequate permitted capacity.</p> <p>The proposed project would generate solid waste typical of a residential development and would not exceed the capacity of existing solid waste collection, transfer, or disposal facilities. In addition, the proposed project would be required to comply with all applicable State and local solid waste reduction requirements, including Senate Bill 1383, which mandates the reduction of organic waste disposal and increased recycling, and Assembly Bill 341, which establishes recycling requirements for multifamily residential development. Compliance with these requirements would include provision of adequate on-site recycling and organic waste collection facilities.</p>
People and Community (PC)	
PC1 Prepare Vulnerable Communities for Hazards	Not Applicable. The proposed project involves construction and operation of a new residential community. The proposed project would not impede the City’s ability to implement this strategy.
PC2 Create Resilient Public Gathering Spaces	Not Applicable. The proposed project involves construction and operation of a new residential community. The proposed project would not impede the City’s ability to implement this strategy.
PC3 Improve Equitable Distribution of Resources	Not Applicable. The proposed project involves construction and operation of a new residential community. The proposed project would not impede the City’s ability to implement this strategy.
PC4 Educate and Incentivize Responsible Consumption	Not Applicable. The proposed project involves construction and operation of a new residential community. The proposed project would not impede the City’s ability to implement this strategy.
PC5 Collaborate to Improve Regional Resilience and GHG Reduction Efforts	Not Applicable. The proposed project involves construction and operation of a new residential community. The proposed project would not impede the City’s ability to implement this strategy.
PC6 Spark Sustainable Economic Development	Not Applicable. The proposed project involves construction and operation of a new residential community. The proposed project would not impede the City’s ability to implement this strategy.

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Table 17 Buena Park CAAP Consistency Analysis

Natural and Urban Lands (NU)	
NU1 Enhance Carbon Sequestration and Support Urban Greening	Consistent. The proposed landscaping would increase vegetative cover by planting trees and other vegetation, contributing to carbon sequestration and urban greening. Accordingly, the proposed project would be consistent with this strategy to enhance carbon storage and support a greener urban environment.
Municipal (M)	
M1 Electrify City Fleet	Not Applicable. The proposed project involves construction and operation of a new residential community. The proposed project would not impede the City's ability to implement this strategy.
M2 Reduce Employee Commute Emissions	Not Applicable. The proposed project involves construction and operation of a new residential community. The proposed project would not impede the City's ability to implement this strategy.
M3 Reduce City Operation Energy Use and Increase Renewable Energy	Not Applicable. The proposed project involves construction and operation of a new residential community. The proposed project would not impede the City's ability to implement this strategy.
M4 Electrify City-Operated Off-Road and Landscaping Equipment	Not Applicable. The proposed project involves construction and operation of a new residential community. The proposed project would not impede the City's ability to implement this strategy.
M5 Reduce City Facility Water Consumption and Increase Water Reuse	Not Applicable. The proposed project involves construction and operation of a new residential community. The proposed project would not impede the City's ability to implement this strategy.
M6 Reduce City-Generated Solid Waste	Not Applicable. The proposed project involves construction and operation of a new residential community. The proposed project would not impede the City's ability to implement this strategy.

Source: Buena Park 2025.

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IX. Hazards and Hazardous Materials

Would the project:

Issues	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

3. ENVIRONMENTAL EVALUATION

The analysis in this section is based in part on the following study, which is included in Appendix D of this Initial Study.

- *Phase I Environmental Site Assessment Report*, Partner, February 2025.

DISCUSSION

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

Less-Than-Significant Impact. A significant impact would occur if the proposed project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Construction of the proposed project would use limited amounts of hazardous materials, including vehicle fuels, grease, oils, transmission fluids, and coatings such as paint. The handling, use, transport, and disposal of these materials would comply with applicable regulations set by the U.S. Environmental Protection Agency (EPA), California Division of Occupational Safety and Health (Cal/OSHA), U.S. Occupational Safety and Health Administration (OSHA), and U.S. Department of Transportation (DOT).

During operation, small amounts of hazardous materials, such as cleansers, paints, fertilizers, and pesticides, that are common in residential properties. However, the proposed project would not be associated with uses that use, generate, store, or transport large quantities of hazardous materials, such as manufacturing, industrial, medical, and other similar uses. 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 impacts during operation of the proposed project would be less than significant.

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

Less-Than-Significant Impact. Use of hazardous materials during construction of the proposed project could potentially include vehicle fuels, grease, oils, transmission fluids, and coatings such as paint. Additionally, use of hazardous materials after construction could potentially include cleaning solvents, fertilizers, pesticides, and other materials used in the regular maintenance and operation of the residential development. An accidental release of any of these materials could pose a health hazard to the public.

A Phase I Environmental Site Assessment for the project site was conducted in January 2025 (see Appendix D). The assessment included identifying recognized environmental conditions (REC), controlled recognized environmental condition (CREC), historical recognized environmental condition (HREC), and a Business Environmental Risk (BER). REC refers to the presence of a hazardous substance or petroleum product in, on, or at the subject property due to a release to

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the environment. No RECs were identified during the assessment. CREC refers to a REC affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls. HREC refers to a previous release of hazardous substances or petroleum products affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities and meeting unrestricted use criteria established by the applicable regulatory authority or authorities without subjecting the subject property to any controls. HRECs were identified on the project site, but all cases were closed and found to not pose a significant environmental concern.

BER is a risk which can have a material environmental or environmentally driven impact on the business associated with the current or planned use of commercial real estate, not necessarily related to environmental issues required to be investigated in this practice. Due to the age of the subject property buildings, there is a potential that asbestos-containing materials (ACM) are present. Readily visible suspect ACMs were observed in good condition and do not appear to pose a health and safety concern to the occupants of the subject property at this time. According to EPA guidelines, suspect materials that are intact and in good condition can generally be managed safely in place under an operations and maintenance program until removal is dictated by renovation, demolition, or deteriorating material condition. Prior to disturbance of the building materials, an ACM survey is recommended

This assessment revealed no evidence of RECs or CRECs. HRECs and BERs were identified in connection with the subject property, but no further investigation of the project site is recommended.

Additionally, the stormwater best management practices required for the proposed project would assist in the prevention of accidental release of hazardous materials (see Section X, *Hydrology and Water Quality*, for additional detail). Thus, compliance with the existing laws and regulations would ensure that the proposed project does not create a significant hazard to the public, and impacts would be less than significant.

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

Less-Than-Significant Impact. There are no schools within one-quarter mile of the project site. The nearest school, Gordon H Beatty Middle School, is approximately one mile northeast of the project site. Construction of the proposed project would include hazardous materials, vehicle fuels, grease, oils, transmission fluids, and coatings that are typical of residential construction projects, though, as described for impact criterion (b), compliance with applicable laws and regulations would ensure that the proposed project does not create a significant hazard to the public.

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The operation of the proposed project would require limited hazardous materials that are typical of residential uses, such as small amounts of typical cleaning supplies and solvents for housekeeping. As discussed under criteria (a) and (b), hazardous materials at the project site during construction and operation would be required to comply with federal, State, and local health codes and regulations. The proposed project would not create a significant hazard through hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, impacts would be less than significant.

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

Less-Than-Significant Impact. A significant impact would occur if the project site were listed as a hazardous materials site pursuant to Government Code Section 65962.5, creating a significant hazard to the public or the environment.

Four environmental lists were searched for hazardous materials site on the project site:

- **GeoTracker:** State Water Resources Control Board (SWRCB 2025)
- **EnviroStor:** Department of Toxic Substances Control (DTSC 2025)
- **EnviroMapper:** US Environmental Protection Agency (EPA 2025)
- **Solid Waste Information System (SWIS):** California Department of Resources, Recycling and Recovery (CalRecycle) (CalRecycle 2025)

A review of these four environmental databases found no evidence of hazardous materials release or threatened release on the project site or within a 1,500-foot radius. GeoTracker identified two Leaking Underground Storage Tank (LUST) Cleanup sites outside of the project site but within this radius; however, the case has been completed and closed (SWRCB 2025). GeoTracker also identified one Cleanup Program Site on the project site; however, the case has been completed and closed. The site is surrounded by residential and commercial uses, and no significant hazardous materials-related risks are anticipated. Therefore, impacts would be less than significant.

- 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?***

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Less-Than-Significant-Impact. The nearest airport to the project site, Fullerton Municipal Airport, is located approximately 0.8 miles to the southeast. The runway is situated in an east/west orientation for take-offs and arrivals. The project site is approximately 0.6 mile to the northwest of the 60 dBA CNEL noise contour for Fullerton Municipal Airport. Therefore, implementation of the proposed project would not result in a safety hazard or excessive noise for people residing in the project area. Therefore, impacts would be less than significant.

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

Less-Than-Significant Impact. The project involves the demolition of the existing buildings and the construction of residential development. During construction and operation, the project would not interfere with any of the daily operations of the Orange County Fire Authority, which supports emergency planning and response efforts in Buena Park. The proposed project would be required to provide the necessary on- and off-site access and circulation for emergency vehicles and services during the construction and operation phases.

The City of Buena Park Emergency Operations Plan (EOP) identifies emergency response policies, describes the response and recovery organization, and assigns specific roles and responsibilities to City departments, agencies, and community partners (Buena Park 2022). Construction and operation of the proposed project would not obstruct the implementation of local procedures and policies, as stated in the City's EOP and other applicable federal and State regulations regarding emergency response. Additional residents would be added to the neighborhood and would be included in the emergency response plan and emergency evacuation plan for the area. Thus, the proposed project would not interfere with any adopted emergency response or evacuation plan, and impacts would be less than significant.

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. A significant impact would occur if the proposed project exposed people and structures to wildfire risks. The project site is outside the State Responsibility Area and is not in a Very High Fire Hazard Severity Zone for wildland fires, designated by the California Department of Forestry and Fire Protection (CAL FIRE 2025). The proposed project would result in development compatible with and typical for the surrounding neighborhood. It would not involve any features that would prevent it from being adequately served by the Orange County Fire Authority and would comply with regulations to minimize wildland fire risk during construction and operation. Therefore, impacts would be less than significant. Potential wildfire impacts are described further in Section XX, *Wildfire*.

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X. Hydrology and Water Quality

Would the project:

Issues	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
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;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

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The analysis in this section is based in part on the following study, which is included in Appendices E and F of this Initial Study.

- *Water Quality Management Plan (WQMP)*, RICK CO., March 2025.
- *Sewer Study*, RICK CO., September 2025.

DISCUSSION

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

Less-Than-Significant Impact.

Construction

A significant impact would occur if the proposed project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into storm drainage systems or does not comply with all applicable regulations as governed by the Santa Ana Regional Water Quality Control Board (RWQCB), Region 8. Clearing, grading, excavation, and construction activities due to the proposed project have the potential to impact water quality by increasing erosion and the amount of debris carried in runoff. The use of construction materials, such as fuels, solvents, and paints, may also present a risk to surface water quality. The refueling and parking of construction vehicles and other equipment on-site during construction may result in oil, grease, or related pollutant leaks and spills that could discharge into the storm drain system.

The project site is larger than one acre (13.76 acres), and the proposed project would therefore be required to comply with an NPDES Construction General Permit and develop and implement a SWPPP. The SWPPP would identify BMPs during construction that would minimize the potential effects due to construction like soil erosion and sedimentation and control pollutants in stormwater runoff. The Construction General Permit (Order WQ 2022-0057-DWQ) also requires that, prior to the start of construction activities, the project applicant must file Permit Registration Documents with the SWRCB, which includes a notice of intent, risk assessment, site map, annual fee, signed certification statement, and SWPPP.

The proposed project would also be required to comply with the Orange County Drainage Area Management Plan (DAMP) to ensure that the site is designed and graded to appropriately manage stormwater runoff, prevent erosion and sedimentation, and protect downstream water quality. Compliance with the DAMP would minimize the potential for pollutants to enter the storm drain system and to avoid adverse impacts to adjacent properties, local creeks, and regional drainage facilities (OC Public Works 2003). Compliance with regulatory requirements would ensure that the construction of the proposed project would not result in substantial erosion or violate water quality standards and impacts would be less than significant.

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Operation

Operation of the proposed project could also impact water quality. Urban runoff from the proposed project may contain oil and grease, trash and debris, and other pollutants common in residential uses. Precipitation at the beginning of the rainy season may result in an initial stormwater runoff with high pollutant concentrations. The proposed project would result in a decrease in impervious areas on-site. The proposed project would add approximately 5,004 square feet of lawn area and 123,931 square feet of planting area. Surface water drainage currently flows into city streets. The additional pervious surfaces would reduce surface flows and improve the water quality of stormwater runoff.

As described above, the proposed project would be regulated under the NPDES permit program administered by the Santa Ana RWQCB to regulate water quality and stormwater runoff. With the implementation of the BMPs and compliance with all applicable regulations and permits, operational impacts to water quality would be less than significant.

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

Less-Than-Significant Impact. A project would have a significant impact on groundwater level if it would change potable water levels sufficiently to: (a) reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or emergencies and drought; (b) reduce yields of adjacent wells or well fields (public or private); (c) adversely change the rate or direction of flow of groundwater; or (d) result in demonstrable and sustained reduction in groundwater recharge capacity.

The City of Buena Park receives its drinking water supply from two main sources, groundwater and imported water. Groundwater makes up 70 percent of Buena Park's water portfolio, and the remaining 30 percent consists of imported water. Groundwater is pumped from an aquifer beneath north Orange County that is recharged daily with 100 million gallons of recycled water (Buena Park 2025b). The proposed project would be served by existing municipal water infrastructure provided by the City of Buena Park and would not require the construction of new groundwater wells or result in direct groundwater extraction. Although operation of the proposed project would increase water demand, this increase would be minor and within the projected growth accommodated under the City's General Plan and Urban Water Management Plan. The project site is currently developed and largely impervious; the proposed project would introduce new pervious surfaces and would not substantially reduce opportunities for infiltration or groundwater recharge in the region. Therefore, the proposed project would not substantially interfere with groundwater recharge, and impacts would be less than significant.

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

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

Less-Than-Significant Impact. A significant impact would occur if the proposed project would substantially impact surface water hydrology or if it would result in a permanent, adverse change to the movement of surface water that is sufficient to substantially change the current or direction of water flow and would result in substantial erosion or siltation.

The proposed project would involve site modifications that would require grading, excavation, and soil exposure during construction, with the potential for erosion or siltation. The proposed project would be required to prepare and implement a SWPPP, which would include BMPs to reduce erosion and siltation. Construction of the proposed project would be subject to the Statewide Construction General Permit and implementation of BMPs specified in the SWPPP. Compliance with City regulations, NPDES permit, and implementation of the SWPPP would ensure that the construction of the proposed project would not result in adverse water quality impacts while the existing drainage pattern of the site is being altered. Thus, the proposed project would not result in substantial erosion and siltation on- or off-site, and impacts would be less than significant.

Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

Less-Than-Significant Impact. A significant impact would occur if the proposed project would substantially impact surface water hydrology or if it would result in a permanent, adverse change to the movement of surface water that would substantially increase the rate or amount of surface runoff and cause flooding on- or off-site.

The project site would have two distinct watershed areas: one watershed would drain to the west to Beach Boulevard, and the other would drain to the southeast to the Brea Creek Channel. Site drainage would be accommodated using a series of storm drain lines and structures. The drainage would be directed to proprietary water quality devices before discharging into the existing 36-inch City storm drain along Beach Boulevard and the Brea Creek Channel. The proposed project would result in a decrease in impervious areas on-site and add approximately 5,004 square feet of lawn area and 123,931 square feet of planting area.

The proposed project would not alter the course of any waterway since there are no streams, rivers, or other surface water bodies on the project site. During construction, the proposed project would be required to comply with the NPDES Construction General Permit and prepare and implement a SWPPP. Under the SWPPP, the proposed project would implement BMPs that would control surface runoff. These BMPs were designed according to the RWQCB Monitoring and Reporting Program (MRP) requirements. With

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implementation of the proposed project's construction and operational BMPs and compliance with applicable regulations, surface runoff from the project site would not result in substantial flooding on- or off-site, and impacts would be less than significant.

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

Less-Than-Significant Impact. A significant impact would occur if the proposed project would substantially impact surface water hydrology or if it would increase runoff to exceed the capacity of stormwater drainage systems.

The project site would have two distinct watershed areas: one watershed would drain to the west to Beach Boulevard, and the other would drain to the southeast to the Brea Creek Channel. Site drainage would be accommodated using a series of storm drain lines and structures. The drainage would be directed to proprietary water quality devices before discharging into the existing 36-inch City storm drain along Beach Boulevard and the Brea Creek Channel. The proposed project would result in a decrease in impervious areas on-site and would add approximately 5,004 square feet of lawn area and 123,931 square feet of planting area. However, during construction, the proposed project would be required to comply with the NPDES Construction General Permit and prepare and implement a SWPPP. Under the SWPPP, the proposed project would implement BMPs that would control surface runoff. This would ensure that the proposed project does not contribute excess runoff into the stormwater drainage system serving the project site. During operation, stormwater or runoff irrigation water would be directed into on-site drainage and conveyed to a series of catch basins and drainage pipes within the existing storm drain infrastructure.

With implementation of the proposed project's construction and operational BMPs and compliance with applicable regulations, the proposed project would not result in a significant increase in site runoff nor change the local drainage patterns to exceed the capacity of stormwater drainage systems serving the project site. The proposed project would also not add substantial sources of polluted runoff. Therefore, impacts would be less than significant.

impede or redirect flood flows?

Less-Than-Significant Impact. According to the Federal Emergency Management Agency (FEMA) Map, part of the southern portion of the project site is adjacent to Brea Creek Channel, which is in a FEMA mapped Zone AO (depth 1 foot). The Buena Park Municipal Code Section 18.220.010 states that new construction in a FEMA-mapped Zone AO must have the lowest floor elevated above the highest adjacent grade and at least as high as the depth number specified in feet on the FEMA map. The proposed project would place the lowest floor, including basements, at the elevation required by the municipal code. Adhering to the City municipal code would ensure the buildings are above the FEMA flood

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zone. Any off-site surface flows that enter the site would enter the proposed storm drain system. Other flood hazards, such as tsunamis, seiche zones, dam inundation areas, and more are discussed under criterion (d). Therefore, the proposed project would not result in impeding or redirecting flood flows, and impacts would be less than significant.

d) *Would the proposed project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?*

Less-Than-Significant Impact. The project site is not in a coastal area. Therefore, tsunamis are not considered a significant hazard. According to the Buena Park General Plan, the project site is in a 0.2 percent Annual Chance Flood Hazard (500-year) area (Buena Park 2010d). As discussed above, adherence to the City municipal code would ensure the buildings are above the FEMA flood zone. Seiches are large waves generated in enclosed bodies of water in response to ground shaking. No major water-retaining structures are immediately up-gradient from the project site, and flooding resulting from a seismically induced seiche is considered unlikely (Geocon 2024). Because there is not a substantial risk of flooding at the project site, the project would not risk release of pollutants due to project inundation, and impacts would be less than significant.

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

Less-Than-Significant Impact. The project site is within the jurisdiction of the Santa Ana RWQCB, which administers the Santa Ana River Basin Water Quality Control Plan. The Basin Plan establishes water quality objectives and implementation programs to maintain and enhance water quality within the region. Groundwater underlying Buena Park is part of the Orange County Groundwater Basin, which is managed by the Orange County Water District (OCWD) under its Groundwater Management Plan and in accordance with the Sustainable Groundwater Management Act (SGMA). The OCWD actively manages groundwater recharge, extraction, and quality through a combination of stormwater capture, imported water recharge, and recycled water use. Implementation of the proposed residential project would not conflict with or obstruct any of the goals or management strategies identified in OCWD's Groundwater Management Plan or the Santa Ana RWQCB Basin Plan. Additionally, the proposed project would comply with all existing local, regional, and state regulations, including the Construction General Permit, NPDES Permit, and SWPPP, and would not obstruct implementation of a water quality control plan. Therefore, impacts would be less than significant.

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XI. Land Use and Planning

Would the project:

Issues	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☒	☐
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

DISCUSSION

a) *Would the proposed project physically divide an established community?*

Less-Than-Significant Impact. A significant impact would occur if the project would create a physical barrier in an established community, such as the construction of a new freeway or railroad or major street closures that could limit access across the neighborhood. The proposed project includes 281 new units, including 50 affordable senior housing apartments, 117 duets, 114 townhomes, and shared and private open spaces. The construction and operation of the proposed project would occur within the boundaries of the project site, which is currently occupied by the existing Amway Nutrilite Campus. Therefore, the proposed project would not physically divide an established community, and impacts would be less than significant.

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

Less-Than-Significant Impact. The proposed project would include the rezoning of the existing project site from Light Industrial (ML) to Medium-Density Multi-Family Residential (RM-20). The RM-20 zone is intended for the development and preservation of medium-density apartments, condominiums, and group quarters in locations convenient to community commercial, recreational, and cultural activities (BPMC § 19.404.020.C). Additionally, the proposed project would require a general plan land use change from Light Industrial to High-Density Residential, which allows for apartment and condominium development, with densities ranging from 20 units per acre to 48 units per acre with senior affordable housing bonuses. Public facilities are also permitted in this land use category (Buena Park 2010a).

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Policies in the land use element and housing element of the Buena Park General Plan encourage the efficient use of urban land, the provision of new housing opportunities, and infill development in areas served by existing infrastructure and public services. The General Plan also includes policies intended to promote compatible land use relationships, minimize land use conflicts, and ensure that new development incorporates appropriate site planning and design features to reduce potential environmental effects related to noise, air quality, traffic, and public services.

The project site is in an urban area. Surrounding development includes commercial uses and residential neighborhoods. The proposed residential development would be compatible with the surrounding land uses because it would introduce a residential use in an area already served by urban infrastructure and public services and would be subject to applicable development standards and conditions of approval intended to ensure land use compatibility.

For these reasons, the proposed project would not 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. Therefore, the impacts would be less than significant.

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XII. Mineral Resources

Would the project:

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

DISCUSSION

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

No Impact. In 1975, the State legislature adopted the Surface Mining and Reclamation Act (SMARA). This designated Mineral Resources Zones (MRZ) that were of statewide or regional importance. According to the California DOC's Mineral Land Classification Map, the project site is in an MRZ-1 zone, an area where information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence (DOC 2025b). The proposed project would not require the extraction of minerals. Therefore, implementation of the proposed project would not result in the loss of availability of a known mineral resource, and no impact would occur.

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

No Impact. The project site is currently developed with commercial/industrial buildings, off-street parking, solar canopies, and landscaping. The City of Buena Park General Plan does not identify any significant mineral aggregate resource areas within city boundaries (Buena Park 2010c), and there are no mines in Buena Park (DOC 2025c). The project site has an 8-inch abandoned oil line that is owned by Chevron. As part of the proposed project, the oil line would be removed, the easement would be vacated, and the new easement would be dedicated to Chevron for any future development. Thus, no active oil wells are on the project site; the nearest oil well is approximately 0.4 mile north and is idle (CalGEM 2025). Therefore, no impact would occur.

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XIII. Noise

Would the project result in:

Issues	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

The analysis in this section is based on information provided in Appendix G, of this Initial Study.

- *Noise and Vibration Analysis*, PlaceWorks, Inc., January 2026

Noise is defined as unwanted sound. It is known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Based on these known adverse effects of noise, the federal government, State of California, and City of Buena Park have established criteria to protect public health and safety and to prevent disruption of certain human activities. Additional information on noise and vibration fundamentals is contained in Appendix G.

Certain land uses are particularly sensitive to noise and vibration. The City of Buena Park General Plan considers residential uses, schools, hospitals, churches, and parks as noise sensitive. The nearest sensitive receptors to the project site are single-family residential uses to the south along Franklin Street. There are also single-family residential uses to the west across Beach Boulevard and multi-family uses to east across the railroad tracks.

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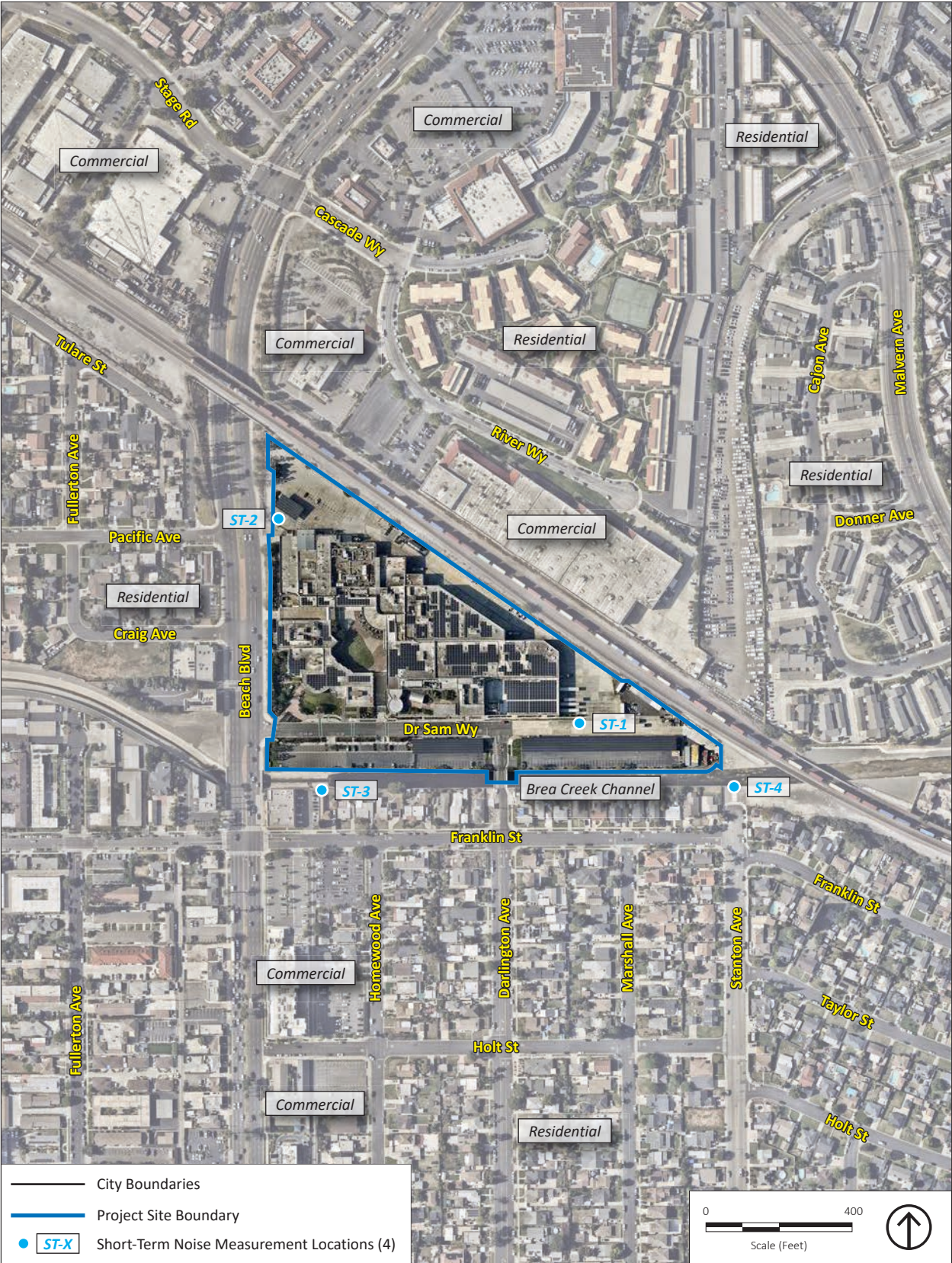
Ambient Noise Monitoring

The noise environment in the project area is primarily influenced by traffic noise on Beach Boulevard and trains pass-bys attributable to the Pacific Surfline and Burlington Northern and Santa Fe railroads. To determine baseline noise levels in the project vicinity, ambient noise monitoring was conducted by PlaceWorks beginning on October 21, 2025 to October 22, 2025. Four short-term (15-minute) and two long-term (24-hour) locations were selected and measurements conducted on and around the project site. The sound level meter (Larson Davis LxT) used for short-term noise monitoring satisfies the American National Standards Institute (ANSI) standard for Type 1 instrumentation. The sound level meter was set to “slow” response and “A” weighting (dBA) and calibrated prior to and after the monitoring period. Measurements were at least five feet above the ground and away from reflective surfaces. Noise measurement locations are described below and shown on Figure 9, *Approximate Noise Monitoring Locations*. Additional noise monitoring data are shown in Appendix G.

Short-Term Measurements

Results of the four short-term (15-minute) measurements are summarized in Table 18, *Short-Term Noise Measurements Summary*.

- **Short-Term Location 1 (ST-1)** was at the eastern portion of Dr Sam Way, at the edge of the delivery driveway. The measurement was taken approximately 135 feet north of the wall along the creek bed. A 15-minute noise measurement began at 11:19 am on Tuesday, October 21, 2025. The noise environment is characterized by semi-trucks refrigerator containers, other vehicle noise, and small planes flying overhead. Noise levels measured 61.6 dBA Leq and 70.3 dBA Lmax during the measurement period at ST-1.
- **Short-Term Location 2 (ST-2)** was at the northwestern end of the Amway Nutrilite Center parking lot, approximately 108 feet from Beach Boulevard center lane and 72 feet from Building #11 on the project site. A 15-minute noise measurement began at 12:10 pm on Tuesday, October 21, 2025. The noise environment is characterized primarily by residential traffic on Beach Boulevard and the dust collectors on the ground level. Noise levels measured 68.8 dBA Leq and 77.9 dBA Lmax during the measurement period at ST-2.
- **Short-Term Location 3 (ST-3)** was at the northern portion of the 5730 Beach Boulevard parking lot. A 15-minute noise measurement began at 1:32 pm on Tuesday, October 21, 2025. The noise environment is characterized primarily by traffic activity on Franklin Street and Beach Boulevard. Noise levels measured 57.1 dBA Leq and 78.8 dBA Lmax during the measurement period at ST-3.



Source: Nearmap 2025.

Figure 9
Approximate Noise Monitoring Locations

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- **Short-Term Location 4 (ST-4)** was at the northern end of Stanton Avenue’s cul-de-sac, just east of 7971 Franklen Street. A 15-minute noise measurement began at 1:10 pm on Tuesday, October 21, 2025. The noise environment is characterized primarily by residential noises (birds, cars, and household tools), and small planes flying in the distance. Noise levels measured 62.1 dBA Leq and 81.3 dBA Lmax during the measurement period at ST-4.

Table 18 Short-Term Noise Measurements Summary

Monitoring Location	Description	15-minute Noise Level, dBA						
		L _{eq}	L _{max}	L _{min}	L ₅₀	L ₂₅	L ₈	L ₂
ST-1	Eastern portion of Dr Sam Way 10/21/25, 11:19 AM	61.6	70.3	59.8	61.1	61.4	62.1	66.4
ST-2	At the northwestern end of the Amway Nutrilite Center parking lot 10/21/25, 12:10 PM	68.8	77.9	60.1	68.1	70.1	71.7	73.2
ST-3	At the northern portion of the 5730 Beach Boulevard parking lot 10/21/25, 1:32 PM	57.1	78.8	47.4	52.6	54.2	57.6	61.8
ST-4	At the northern end of Stanton Avenue’s cul-de-sac 10/21/25, 1:10 PM	62.1	81.3	44.5	50.2	56.2	65.3	72.4

Source: Appendix G.

Applicable Noise Standards

City of Buena Park Noise Standards

The City of Buena Park’s regulations with respect to noise are in the General Plan Noise Element; Chapter 8.28, Noise Control, of the municipal code; and the Orange County Code, Division 6, “Noise Control.” Operational noise restrictions are shown in Table 19, *City of Buena Park Exterior and Interior Noise Limits*, and construction-related noise restrictions are discussed below:

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Table 19 City of Buena Park Exterior and Interior Noise Limits

Land Use	Noise Level (dBA) Property Line	Time Period
Exterior Noise Limits		
Residential	55	7:00 am to 10:00 pm
	50	10:00 pm to 7:00 am
Interior Noise Limits		
Residential	55	7:00 am to 10:00 pm
	45	10:00 pm to 7:00 am

Sources: Buena Park Municipal Code Section 8.28.010; Orange County Code Section 4-6-5.

1. The noise standard for a cumulative period of more than 30 minutes in any hour; or
2. The noise standard plus 5 dBA for a cumulative period of more than 15 minutes in any hour; or
3. The noise standard plus 10 dBA for a cumulative period of more than 5 minutes in any hour; or
4. The noise standard plus 15 dBA for a cumulative period of more than one minute in any hour; or
5. The noise standard plus 20 dBA for any period of time.

In addition to the exterior noise standards in Table 19, Section 4-6-5(c) of the Orange County Code further allows correction to the noise level standard depending on the measured ambient noise levels. In the event the ambient noise level exceeds any of the first four noise limit categories in the Table 19 notes, the cumulative period applicable to said category shall be increased to reflect that ambient noise level. In the event the ambient noise level exceeds the fifth noise limit category, the maximum allowable noise level under that category shall be increased to reflect the maximum ambient noise level.

Section 4-6-6 sets forth interior noise levels limits for residential properties, which are shown in Table 19. Additional time exceedance restrictions in Section 4-6-6 are, in part:

It shall be unlawful for any person...to create any noise, or to allow the creation of any noise on property owned, leased, occupied, or otherwise controlled by such person, when the foregoing causes the noise level, when measured within any other dwelling unit on any residential property...to exceed:

1. The interior noise standard for a cumulative period of more than five (5) minutes in any hour; or
2. The interior noise standard plus five (5) dBA for a cumulative period of more than one (1) minute in any hour; or
3. The interior noise standard plus ten (10) dBA for any period of time.

Buena Park Municipal Code Section 8.28.040(4)(a), Construction or Repair Activities. The performance of any construction or repair work of any kind upon, or excavating for, any building or structure, where any such work entails the use of

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any air compressor, jackhammer, power-driven drill, riveting machine, excavator, hand hammer on steel or iron, or any other machine, tool, device or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in a dwelling, hotel, or apartment or other place of residence. The above use of machinery or equipment that produces such unnecessary noise shall be prohibited on any Sunday or any other day between the hours of eight (8:00) pm and seven (7:00) am.

Federal Transit Administration Guidelines

The City does not have regulatory standards for construction or operational noise and vibration sources. As such, the FTA guidelines are used to determine compliance for construction noise at residential uses of 80 dBA Leq; a vibration standard of 0.2 inch per second (in/sec) peak particle velocity (PPV) for normal residential buildings; and a standard of 0.08 in/sec PPV for old or historically significant structures.

Project Design Features

The proposed project site would be exposed to existing rail operations and future High Speed Rail operations as well. To ensure compliance with land use compatibility guidelines the following project design features are included in the project:

- i) **Noise PDF-1** The project will incorporate building construction techniques and insulation that is consistent with California Title 24 Building Standards to achieve the minimum interior noise standard of 45 dBA CNEL for all habitable rooms.
- ii) **Noise PDF-2** All exterior windows, doors, and sliding glass doors will have a positive seal and leaks/cracks will be kept to a minimum, and/or replaced.
- iii) **Noise PDF-3** A “windows closed” conditions and upgraded windows, sliding glass doors, and exterior doors will be required for all residential units facing Beach Boulevard and the railroad tracks to ensure compliance with interior noise standards. See Appendix G, *Preliminary Land Use Compatibility Noise Analysis Memorandum for the proposed 5600 Beach Boulevard Residential Development Project, Buena Park, California, October 16, 2024*, for more details.

DISCUSSION

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

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Construction

Less-Than-Significant Impact with Mitigation Incorporated. The proposed project would include demolition of the existing Amway Nutrilite Center Campus and construction of a new residential development with 281 new units—50 affordable senior housing apartments, 117 duets, and 114 townhomes. Shared and private open spaces and new private residential streets would also be constructed. Construction would occur over approximately 44 months (February 2027 to end in October 2030) in four general phases, as discussed in Section 2.4.1. Construction activities would include demolition and removal of building remains, grading and excavation, trenching for site utilities and irrigation, building construction, architectural coatings, driveway and walkway construction, and landscaping improvements. Construction of the proposed project would not require pile driving or rock blasting at the project site.

Noise generated during construction is based on the type of equipment used, the location of the equipment relative to sensitive receptors, and the timing and duration of the noise-generating activities. Noise levels from construction activities are dominated by the loudest piece of construction equipment. The dominant noise source is typically the engine, although work piece noise (such as dropping of materials) can also be noticeable.

The noise produced at each construction phase is determined by combining the Leq contributions from the three loudest pieces of equipment used at a given time while accounting for the ongoing time variations of noise emissions (commonly referred to as the usage factor). Heavy equipment, such as a dozer or a loader, can have maximum, short-duration noise levels of up to 85 dBA at 50 feet. However, overall noise emissions vary considerably, depending on what specific activity is being performed at any given moment.

Noise attenuation due to distance, the number and type of equipment, and the load and power requirements to accomplish tasks at each construction phase would result in different noise levels from construction activities at a given receptor. Since noise from construction equipment is intermittent and diminishes at a rate of at least 6 dBA per doubling of distance (conservatively disregarding other attenuation effects from air absorption, ground effects, and shielding effects provided by intervening structures or existing solid walls), the average noise levels at noise-sensitive receptors could vary considerably, because mobile construction equipment would move around the site (area of each development phase) with different equipment mixes, loads, and power requirements.

The expected construction equipment mix was estimated and categorized by construction activity using the Federal Highway Administration Roadway Construction Model (RCNM). Assuming the nearest off-site sensitive receptor to the closest boundary for project construction activities, construction-related noise levels would range between 74 dBA to 76 dBA Leq during the most intense construction phases. Construction noise levels at receptors further away are estimated to

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be even less. The results are summarized in Table 20, *Project-Related Construction Noise Levels, dBA, at the Nearest Receptors*.

The nearest sensitive receptor to the most project construction noise exposure are residential uses 75 feet south of proposed paving construction phases. Receptors to the south would be exposed to periodic, short-term noise levels of up to 76 dBA Leq during paving activities. The proposed project's construction activities would occur within the noise-standard-exempt time frame identified in Section 8.28.040(4)(a) of the City of Buena Park Municipal Code, 7:00 am to 8:00 pm Monday through Saturday. The proposed project's construction activities would not exceed the FTA's construction noise standard at residential uses (80 dBA Leq); however, as indicated in Table 18, *Short-Term Noise Measurements Summary*, project-related construction noise levels would result in substantial temporary short-term increases in ambient noise levels.

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Table 20 Project-Related Construction Noise Level, dBA at the Nearest Receptors

Construction Activity Phase ¹	Noise Levels in dBA Leq						
	RCNM Reference Noise Level	Industrial Receptor to North	Multi-family Receptor to North ¹	School/Park Receptor to West	Single-Family Receptor to West ²	Single-Family Receptor to South	Multi-family Receptor to East ²
Distance (feet)	50	375	540	290	300	150	325
P1 Demolition	84	66	58	69	65	74	65
P1 On-Site Debris Reprocessing	80	62	54	65	61	70	61
P1 Site Preparation	81	63	55	66	62	71	62
P2 Rough Grading	84	66	58	69	65	74	65
P3 Fine Grading	84	66	58	69	65	74	65
Distance (feet)	50	140	380	180	250	115	380
P3 Utility Trenching	77	68	54	66	60	70	56
Distance (feet)	50	175	435	195	235	775	1,330
P4.1 Senior Affordable Apartments	79	68	55	67	63	55	48
P4.1 Architectural Coating	80	69	56	68	64	56	49
Distance (feet)	50	175	455	155	235	75	295
P4.2 Townhomes and Duet Homes	79	68	55	69	63	75	61
P4.2 Architectural Coating	77	66	53	67	61	73	59
Distance (feet)	50	170	390	175	235	715	1,250
P4.1 Paving	80	69	57	69	64	57	49
Distance (feet)	50	145	425	200	300	75	245
P4.2 Paving	80	71	56	68	61	76	63
Exceeds 80 Leq Standard?		No	No	No	No	No	No

Source: FHWA's RCNM software. See Appendix G.

Notes: Distance measurements were conducted using Google Earth (2026).

1 Intervening structures and topography provide -5 dBA shielding offset.

2 Existing CMU wall provides -3 dBA shielding offset.

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Impact NOI-1: Construction noise levels would result in substantial temporary short-term noise increases in ambient noise levels at the residential receptors to the south of the site. With construction activities lasting over 44 months, generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project would occur.

Mitigation Measure NOI-1. The Applicant shall designate a noise disturbance coordinator who would respond to neighborhood complaints, to be in place prior to the start of construction and implemented during construction to inform neighboring residents of construction schedules, hours of construction activity, and reduce noise impacts on other uses. Project construction operations shall use best available noise suppression devices and techniques. Construction contractors shall implement the following measures during construction activities including but not limited to the following:

- Limit construction hours to between 7:00 a.m. and 8:00 p.m., Monday through Saturday.
- Locate on-site reprocessing of demolition debris machinery as far from noise-sensitive receptors as possible.
- Equip all internal combustion-engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
- Prohibit unnecessary idling of internal combustion engines.
- Locate stationary noise-generating equipment such as air compressors or portable power generators as far as possible from sensitive receptors. Construct temporary noise barriers to screen stationary noise-generating equipment when located near residential noise-sensitive receptors to the south of the project site.
- Utilize “quiet” air compressors where technology exists.
- Control noise from construction workers’ radios to a point where they are not audible at existing residences bordering the project site.
- Notify all adjacent residences and other noise-sensitive land uses about the construction schedule in writing, and provide a written schedule of noise intense construction activities to the adjacent land uses and nearby residences.
- Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the

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construction schedule. The disturbance coordinator shall determine the cause of the noise complaint (e.g., duration of exposure to elevated construction noise levels, bad muffler) and shall require that reasonable measures be implemented to resolve the complaint. Additional measures could include:

- Install temporary acoustical barriers as close to the noise source or as close to the receptor as possible that would break line of sight between the source and receptor. Acoustical barriers shall be constructed with material having a minimum surface weight of 2 pounds per square foot or greater, and a demonstrated Sound Transmission Class (STC) rating of 25 or greater as defined by American Society for Testing and Materials (ASTM) Test Method E90. Placement, orientation, size, and density of acoustical barriers shall be specified by a qualified acoustical consultant.
- Relocate on-site stationary construction equipment to increase the distance from source to receptor.

Significance After Mitigation: With implementation of Section 8.28.040(4)(a) construction time restrictions and Mitigation Measure NOI-1, the proposed project's construction-related noise impacts would be reduced to less than significant.

Operational Off-Site Traffic Noise

Less-Than-Significant Impact. 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 dBA to 3 dBA under quiet, controlled conditions. Changes of less than 1 dBA are usually indiscernible. A significant impact would occur if the following traffic noise increases occur relative to the existing noise environment:

- 1.5 dBA in ambient noise environments of 65 dBA CNEL and higher
- 3 dBA in ambient noise environments of 60 to 64 dBA CNEL
- 5 dBA in ambient noise environments of less than 60 dBA CNEL

Traffic volume data for the new trips associated with the project are provided by LLG (2025). The proposed project is expected to increase existing daily trips by 1,718 new trips, with 120 AM peak trips and 142 PM peak trips. The data provided by the traffic engineer present the street and locations with scenarios for existing, existing with project conditions, 2029 no-project, and 2029 with-project conditions.

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Vehicle traffic noise levels were estimated using the FHWA Highway Traffic Noise Prediction Model. The FHWA model predicts noise levels through a series of adjustments to a reference sound level. These adjustments account for distances from the roadway, vehicle traffic volumes, vehicle speeds, car/truck mix, number of lanes, and road width. Table 21, *Project-Related Increases in Traffic Noise, dBA CNEL, at 50 Feet*, shows modeled traffic noise levels and project related traffic noise increases.

With project trip additions, noise levels along all analyzed roadway segments would increase by less than 1 dBA on most roadway segments. The Darlington Avenue segment, from Franklin Street to Dr Sam Way, would experience a 2 dBA increase, and the Franklin Street segment, from Homewood Avenue to Darlington Avenue, would experience a beneficial -2 dBA decrease as a result of the proposed project. The addition of proposed project trips would be below the significance thresholds for traffic noise increases over existing conditions. Therefore, project-related traffic noise impacts would be less than significant.

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Table 21 Project-Related Increases in Traffic Noise, dBA CNEL at 50 Feet

Roadway	Segment		Average Daily Traffic Noise Levels, dBA CNEL					
	From	To	Existing	Existing With Project	Project Increase (Existing)	2029 No Project	2029 With Project	Project Increase (2029)
Beach Blvd	Imperial Hwy	Rosecrans Ave	77	77	<1	77	77	<1
Beach Blvd	Rosecrans Ave	La Mirada Blvd/Malvern Ave	75	75	<1	75	75	<1
Beach Blvd	La Mirada Blvd/Malvern Ave	Stage Rd/Cascade Way	74	74	<1	74	74	<1
Beach Blvd	Stage Rd/Cascade Way	Craig Ave	74	74	<1	74	74	<1
Beach Blvd	Craig Ave	Dr Sam Way	73	73	<1	73	73	<1
Beach Blvd	Dr Sam Way	Franklin St	73	73	<1	73	73	<1
Beach Blvd	Franklin St	Artesia Blvd	73	73	<1	73	73	<1
Beach Blvd	Artesia Blvd	Commonwealth Ave	72	72	<1	72	72	<1
Beach Blvd	Commonwealth Ave	Auto Center Dr	72	72	<1	72	72	<1
Beach Blvd	Auto Center Dr	Orangethorpe Ave	73	73	<1	73	73	<1
Beach Blvd	Orangethorpe Ave	SR-91 WB Ramps	73	73	<1	73	73	<1
Darlington Ave	Franklin St	Dr Sam Way	48	50	2	48	50	2
Stanton Ave	Franklin St	Taylor St	55	55	<1	55	55	<1
Stanton Ave	Taylor St	Holt St	55	56	1	56	56	<1
Stanton Ave	Holt St	Artesia Blvd	57	57	<1	57	57	<1
Stanton Ave	Artesia Blvd	4th St	67	67	<1	67	67	<1
Stanton Ave	4th St	Commonwealth Ave	67	67	<1	67	67	<1
Stanton Ave	Commonwealth Ave	7th St	68	68	<1	69	69	<1
Stanton Ave	7th St	Whitaker St	69	69	<1	69	69	<1
Franklin St	the West	Beach Blvd	59	59	<1	59	59	<1
Franklin St	Beach Blvd	Homewood Ave	56	57	<1	57	57	<1
Franklin St	Homewood Ave	Darlington Ave	54	52	-2	54	52	-2

3. ENVIRONMENTAL EVALUATION

Table 21 Project-Related Increases in Traffic Noise, dBA CNEL at 50 Feet

Roadway	Segment		Average Daily Traffic Noise Levels, dBA CNEL					
	From	To	Existing	Existing With Project	Project Increase (Existing)	2029 No Project	2029 With Project	Project Increase (2029)
Franklin St	Darlington Ave	Marshall Ave	53	53	<1	53	54	1
Franklin St	Marshall Ave	Stanton Ave	53	53	<1	53	53	<1
Franklin St	Stanton Ave	the East	48	48	<1	48	48	<1
Artesia Blvd	Rostrata Ave	Western Ave	70	70	<1	71	71	<1

Source: FHWA Highway Noise Prediction Model (FHWA-RD-77-108) in Appendix G. Based on traffic volumes provided by LLG (see Appendix I).

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Operational On-Site Noise

Less-Than-Significant Impact. Stationary noise sources associated with the proposed project would include mechanical equipment, on-site interior roadway traffic movements, parking events, and recreational activities at outdoor common uses areas. The proposed project would include an open space amenity area in the northeastern portion of the site, but this area would be shielded from surrounding noise-sensitive uses by intervening on-site buildings of the proposed townhomes. Project parking stalls would be located along the eastern project boundary of the site but would be shielded from multi-family receptors to the north by the proposed northern project boundary wall. Receptors to the west and south of parking stalls would also be shielded by intervening on-site buildings of the proposed townhomes and senior apartments.

The proposed project would include ground-mounted HVAC equipment at the senior apartments and each townhome/duet that cycle on and off based on the heating or cooling needs. Ground-mounted residential HVAC units could generate noise levels of up to 75 dBA at 3 feet (Carrier 2009). The nearest receptors are the residential uses approximately 65 feet south of the nearest townhouse ground-mounted residential HVAC units. Assuming a full hour of 100 percent operation, HVAC noise levels would be approximately 48 dBA at the nearest residential receptors to the south and 41 dBA at residential receptors approximately 145 feet to the west. Project HVAC noise levels would be even less at residential receptors to the north. Operational noise levels would not exceed Section 8.28.010 residential daytime and nighttime noise standards of 55 dBA and 50 dBA Leq, respectively, and would not result in a significant permanent increase above existing noise levels at residential uses. Therefore, project-related operational noise impacts would be less than significant.

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

Construction

Less-Than-Significant Impact. Potential vibration impacts associated with the projects are usually related to the use of heavy construction equipment. Construction can generate varying degrees of ground vibration, depending on the construction procedures and equipment. The use of construction equipment generates vibrations that spread through the ground and diminish with distance from the source. The effect on buildings in the vicinity of the construction site varies depending on soil type, ground strata, and receptor-building construction. The effects from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Vibration from construction activities rarely reaches the levels that can damage structures.

Table 22, *Proposed Project's Vibration Levels*, summarizes vibration levels for typical construction equipment at a reference distance of 25 feet. Typical construction equipment for this project can generate vibration levels ranging up to 0.21 in/sec PPV at 25 feet. Vibration levels at the nearest receptor 65 feet to the south of the project site would attenuate to 0.050 in/sec PPV. As shown

3. ENVIRONMENTAL EVALUATION

in Table 22, the proposed construction activities would not exceed the 0.2 in/sec PPV FTA standard at any adjacent receptor to proposed project construction vibration activity. In addition, as a residential land use, the proposed project would not include any new operational vibration sources. Therefore, project-related vibration impacts would be less than significant.

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Table 22 Project-Related Construction Vibration Damage Levels

Equipment	Levels, PPV (in/sec)						
	FTA Reference at 25 Feet	Industrial Receptor to North at 115	Multi-family Receptor to North at 375	School/Park Receptor to West at 120	Single-Family Receptor to West at 225	Single-Family Receptor to South at 65	Multi-family Receptor to East at 200
Vibratory Roller	0.21	0.021	0.004	0.020	0.008	0.050	0.009
Clam shovel	0.202	0.020	0.003	0.019	0.007	0.048	0.009
Hoe Ram	0.089	0.009	0.002	0.008	0.003	0.021	0.004
Large Bulldozer	0.089	0.009	0.002	0.008	0.003	0.021	0.004
Caisson Drilling	0.089	0.009	0.002	0.008	0.003	0.021	0.004
Loaded Trucks	0.076	0.008	0.001	0.007	0.003	0.018	0.003
Jackhammer	0.035	0.004	0.001	0.003	0.001	0.008	0.002
Small Bulldozer	0.003	0.000	0.000	0.000	0.000	0.001	0.000
Exceed 0.2 in/sec PPV Standard?		No	No	No	No	No	No

Source: FTA 2018. See Appendix G.

Note: Distance measurements were conducted using Google Earth (2025) from the boundary of work areas to the nearest receptors.

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- c) *Would the proposed project, 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, expose people residing or working in the project area to excessive noise levels?*

Less-Than-Significant Impact. The nearest airport to the project site, Fullerton Municipal Airport, is located approximately 0.8 miles to the southeast. The runway is situated in an east/west orientation for take-offs and arrivals. The project site is approximately 0.6 mile to the northwest of the 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. Therefore, impacts would be less than significant.

3. ENVIRONMENTAL EVALUATIONS

XIV. Population and Housing

Would the project:

Issues	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

DISCUSSION

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

Less-Than-Significant Impact. The proposed project would develop 281 new residential units in Buena Park, adding an estimated total of 593 new residents to the project site. The project site is currently developed with commercial/industrial buildings, off-street parking, solar canopies, and landscaping and has a land use designation and zoning of light industrial. The proposed project would change the land use designation to High Density Residential and the zoning to Medium-Density Multifamily Residential.

The housing element of the Buena Park General Plan stated that the city's population increased by 6 percent between 2000 and 2020, from 77,962 to 82,336 residents. The City has been allocated a Regional Housing Needs Assessment (RHNA) of 8,919 units for the 2021-2029 planning period; however, the City has an RHNA shortfall of 7,962 total units (Buena Park 2022). Given the relatively small size of the project in the context of local growth projections, the proposed project would serve the existing and planned community and not induce substantial unplanned population growth. Additionally, the proposed project would aid the City in meeting its RHNA shortfall. Therefore, a less-than-significant impact would occur.

- b) ***Would the proposed project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?***

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No Impact. The project site currently has a land use designation and zoning of light industrial. The proposed project would change the land use designation of the project site to High Density Residential and the zoning to Medium-Density Multifamily Residential. No housing currently exists on-site. Thus, development of the proposed project would not displace existing people or housing, and no replacement housing would be necessary. Therefore, no impact would occur.

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XV. Public Services

Would the project:

Issues	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐

The analysis in this section is based in part on the following study, which is included in Appendix H of this Initial Study.

- *Preliminary Fire Master Plan*, Orange County Fire Authority, September 2025.

DISCUSSION

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

Fire protection?

Less-Than-Significant Impact. Fire protection and emergency medical services in Buena Park are provided by the Orange County Fire Authority (OCFA). The project site is served by Fire Station 62 at 7780 Artesia Boulevard, approximately 0.4 mile to the south. Fire Station 41 is at 3900 Artesia Ave and approximately 1.7 miles east of the project site. Fire Station 62 would be the first

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responding fire station for an on-site emergency. Because the proposed project would increase the residential population on the project site, project implementation could result in a slight increase in calls for fire protection and emergency medical service. However, the proposed project is in an urban residential area in OCFA's service area, and multiple fire stations are nearby. The proposed project is not expected to impact fire protection and emergency services, including response times. Additionally, in the event of an emergency at the project site that would require more resources, the OCFA would direct resources to the project site from nearby stations.

The proposed project would include 25-foot fire lanes, multiple fire hydrants, and hose pull locations within the project site (see Appendix H). Development of the proposed project would be required to comply with the most current adopted fire codes, building codes, and nationally recognized fire and life safety standards, which impose design standards and requirements that seek to minimize and mitigate fire risk. Compliance with these codes and standards is ensured through the OCFA development review and building permit process. Based on the preceding, the proposed project would not adversely affect the OCFA's ability to provide adequate service and would not require new or expanded fire facilities that could result in adverse environmental impacts. Therefore, impacts would be less than significant.

Police protection?

Less-Than-Significant Impact. The project site is served by the Buena Park Police Department (BPPD) at 6640 Beach Boulevard that provides police protection services for Buena Park and has a staff of 93 sworn personnel. Depending on police staff levels, the police officer to population ratio is 1.1 to 1.3 officers per 1,000 residents. The Priority 1 response time average is 4.5 minutes (BPPD 2024). Because the proposed project would increase the residential population on the project site, project implementation could result in a slight increase in calls for police protection service. However, considering the existing police resources available in and near the city, project impacts on police services (including response times) are not expected. Additionally, in the event of an emergency at the project site that would require more resources than the nearby stations could provide, the police department would direct resources to the project site from other BPPD stations, and would request assistance from other local police stations nearby, if needed. Thus, the proposed project would not adversely affect the police department's ability to provide adequate service and would not require new or expanded police facilities that could result in adverse environmental impacts. Therefore, impacts would be less than significant.

Schools?

Less-Than-Significant-Impact. The proposed project is residential. The project site is in the Buena Park School District (BPSD). The BPSD has 8 public elementary and middle schools, and one preschool, with a combined population of 3,784 students (CDE 2024). Additionally, Buena Park High School serves the city of Buena Park, which is part of the Fullerton Joint Union High School District (FJUHS). The proposed project would be anticipated to generate approximately 53 new

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elementary school students, 13 new middle school students, and 33 new high school students⁵. The proposed project would not be big enough to generate a significant increase in student population in the area that would not result in adverse effects to current school facilities requiring renovation or expansion. Therefore, the proposed project would result in a less than significant impact.

Parks?

Less Than Significant Impact. Buena Park has a variety of public parks and other recreational facilities that total approximately 96.1 acres of parkland. The city has 11 parks, one community recreation center and senior center, one community gymnasium, and a community garden (Buena Park 2010b). The public parks range from 0.50 to 22.5 acres and are generally located in residential neighborhoods throughout the city. The nearest parks are Friendship (Smith-Murphy) Park, approximately 0.4 miles northeast of the project site, and Ralph B Clark Park, two miles northeast of the project site.

The proposed project would also have 183,999 square feet of open space and common space areas, including 5,973 square feet of private balcony space; 3,574 square feet of ground-floor open space; and 174,452 square feet of common space amenities. Active amenities for the affordable apartments include an open space lawn, dog relief area, and seating areas. Amenities for the duet homes and townhomes would include a community pool, spa, BBQ/seating area, paseos, dog relief areas, and open recreation area. Though project residents would be expected to utilize city park facilities, given the open space provided by the proposed project and its compatibility with typical development in the project area, the project would not increase demand such that renovation or expansion of park facilities would be required. Additionally, the City of Buena Park has adopted development impact fees as part of the building application and approval process, which would require the project applicant to contribute towards the funding, improvement, and long-term maintenance of parks and recreational facilities in the City. Therefore, impacts would be less than significant.

Other public facilities?

Less Than Significant Impact. The proposed project would not result in significant impacts associated with the provision of other new or physically altered public facilities (e.g., libraries, hospitals, childcare, teen or senior centers). Physical impacts to public services are usually associated with population in-migration and growth, which increase the demand for public services and facilities. The Buena Park Library District provides educational and recreational programming for all ages and interests, including story time, book clubs, crafts, and performances. The proposed project would add approximately 593 residents to the

⁵ Buena Park School District does not have specific Student Generation Rates (SGRs). Approximate SGRs calculated based on surrounding school district SGR, including La Habra City School District and Fullerton Joint Union High School District. Elementary school = 0.2335 per single-family dwelling unit; Middle School = 0.0565 per single-family dwelling unit; and High School = 0.145 per single-family dwelling unit.

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neighborhood; however, the residents of the proposed project would likely already be residents of Buena Park and would not increase the project area's population. The proposed project would not substantially induce population growth. Therefore, the proposed project would not generate additional demand for library services, and impacts would be less than significant.

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XVI. Recreation

Would the project:

Issues	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

DISCUSSION

- a) ***Would the proposed 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 would develop 281 new residential units, including a four-story senior affordable apartment building with 50 units, 117 duet homes, and 114 townhomes. The City of Buena Park operates 96.1 acres of parkland—11 parks, a community recreation center and senior center, community gymnasium, and community garden (Buena Park 2010b). The nearest public park to the project site is Friendship (Smith-Murphy) Park, approximately 0.4 mile northeast of the project site. It is a 6.9-acre park owned by the City, with a children’s play area, picnic areas with BBQs, handball courts, and restrooms (Buena Park 2025c).

The proposed project would add approximately 593 residents to the neighborhood; however, the project would also include approximately 183,999 square feet of open space area, which includes common recreation areas and additional outdoor spaces for private use. Residents are anticipated to utilize these recreation and outdoor areas. As stated in Section XIV(a), given the relatively small size of the project in the context of local growth projections, the existing and planned community would inhabit the proposed project, and it would not induce substantial unplanned population growth. Additionally, the City of Buena Park has adopted development impact fees as part of the building application and approval process, which would require the project applicant to contribute towards the funding, improvement, and long-term maintenance of parks and recreational facilities in the City. With the provision of on-site open space and

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payment of applicable fees to the City, the proposed project would not result in substantial physical deterioration of existing neighborhood or regional parks. Therefore, impacts would be less than significant.

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

Less-Than-Significant Impact. As discussed above, the proposed project includes the construction of 183,999 square feet of open space and common space areas. This would include landscaped area with benches, tables, and chairs and a swimming pool, and they are already included in the proposed project and landscape plan. The City's existing park and recreation facilities would be able to serve the proposed project. Therefore, the proposed project would not warrant the construction or expansion of recreational facilities beyond what is proposed on-site. This impact is less than significant.

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XVII. Transportation

Would the project:

Issues	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

The analysis in this section is based in part on the following technical report, which is in Appendix I to this Initial Study:

- *Traffic Impact Analysis (TIA) for the Amway Project*, LLG, November, 2025

DISCUSSION

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

Less-Than-Significant Impact. The gross project trips are estimated to be 1,718 daily trips on a weekday, 120 AM peak hour trips, and 142 PM peak hour trips. Compared to the existing Amway facility occupying the project site, the proposed residential project would result in 386 additional daily trips, but would result in 58 fewer AM peak hour trips, and 39 fewer PM peak hour trips. Furthermore, the proposed project trips would be mostly passenger cars replacing truck trips generated by the Amway Nutrilite Campus.

On-site circulation of the proposed project was reviewed as part of the TIA and concluded to be adequate. This included driveway and internal roadway orientation, residential building layout, parking configuration, parking accessibility, pedestrian and bicycle connections on-site and with surrounding uses, bus stop locations and accessibility to public transit, passenger loading/unloading locations, delivery/service operations, and expected drop-off/pick-up travel routes.

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The project site is 0.43 mile (1.1-mile driving distance) from the Buena Park Metrolink Station and in a Transit Priority Area and Major Transit Stop, as defined by SCAG. Although the project site is not along a High Quality Transit Corridor, it is only 1.3 miles from the northern boundary of the High Quality Transit Corridor along Beach Boulevard at Orangethorpe Avenue.

Project operation would not block, remove, or otherwise interfere with the safety or performance of the circulation system and would not interfere with bus services operating near the project site. Therefore, impacts would be less than significant.

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

Less-Than-Significant Impact. The City of Buena Park has adopted criteria for evaluating VMT impacts under CEQA in the “City of Buena Park Traffic Impact Analysis Guidelines 2020 for Vehicle Miles Traveled and Level of Service Assessment” (June 2020). There are three types of screening methods to effectively screen projects from project-level assessment: (1) Transit Priority Area (TPA) Screening, (2) Low VMT Area Screening, (3) Project Type Screening.

The TIA determined that the proposed project is in a TPA and low VMT generating zone and includes affordable housing units. It is therefore screened out from further VMT project level assessment because it can be presumed to have a less-than-significant impact on VMT.

c) *Would the proposed project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

Less-Than-Significant Impact. Construction of the proposed project would involve typical construction-related activities, including lane narrowing and/or lane closures and sidewalk closures. In the event of any type of street closure, clear signage (e.g., closure and detour signs) would be provided to ensure vehicles, pedestrians, and bicyclists are able to adequately reach their intended destinations safely. The proposed project would be required to submit a construction management plan for City approval that addresses schedule, closures/detours, staging, parking, and truck routes.

The TIA includes a traffic safety assessment that examines the collision history at 43 study-area intersections, truck trips in the study area, and sight distance at project driveway intersections. The TIA recommends installing signs—including “No Right-Turn on Red,” “Use Crosswalk,” and “Cross Traffic Does Not Stop”—at the Beach Boulevard and Dr. Sam Way intersection, the project driveway/Street B intersection with Beach Boulevard, and at the intersection of Beach Boulevard with Franklin Street.

Additionally, a queuing analysis at key intersections determined if there would be adequate storage for movements. The 95th percentile queues are adequately accommodated by the existing storage lengths and/or driveway “throat” lengths. It can be concluded that the proposed

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project would have adequate site access, and project-related improvements to address any queuing issues would not be necessary. Therefore, impacts would be less than significant.

d) *Would the proposed project result in inadequate emergency access?*

Less-Than-Significant Impact. The TIA determined that the proposed project would not result in inadequate emergency access. The proposed site plan for the project would maintain existing sidewalks and access to public transit; construct new pedestrian connections on-site and with adjoining uses; and meet City design standards regarding site access, multimodal connectivity within the internal site circulation system, emergency access, and on-site parking. Additionally, the proposed project would include 25-foot fire lanes, multiple fire hydrants, and hose pull locations within the project site (see Appendix H). Therefore, impacts would be less than significant.

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XVIII. Tribal Cultural Resources

Would the project:

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

DISCUSSION

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

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

Less-Than-Significant Impact. The project site is not listed or eligible for listing in the California Register of Historical Resources, National Register of Historic Places, California State Historical Landmarks or Points of Historical Interest, or in a local register of historical resources (NPS 2025a, 2025b; OHP 2025a, 2025b). The project site does not meet any of the historic resource criteria and does not meet the definition of a historic resource pursuant to CEQA. The project would not impact a tribal cultural resources (TCR) that is listed on any of the registers of historic resources. Due to the developed nature of the project site and surrounding area, the proposed project would not impact a resource listed on the California Register, National Register, California Landmarks or Points of Interest, or in a local register of historical resources. Therefore, there would be no impacts to tribal cultural resources that are listed or eligible for listing on federal, state, or local registers.

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

Less-Than-Significant Impact With Mitigation Incorporated. In accordance with Public Resources Code Section 21080.1(d), a lead agency is required to provide formal notification of intended development projects to Native American tribes that have requested to be on the lead agency's list for receiving such notification. The formal notification is required to include a brief description of the proposed project and its location, lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation. Pursuant to AB 52 and SB 18, the City of Buena Park invited California Native American tribes that are traditionally and culturally affiliated with the project area to consult on the proposed project via email and certified mail on December 3, 2025. Seven tribes were contacted—the Cahuilla Band of Indians, Gabrieleño Band of Mission Indians—Kizh Nation, Gabrielino-Tongva Tribe, Soboba Band of Luiseno Indians, Juaneño Band of Mission Indians, Gabrieleño/Tongva San Gabriel Band of Mission Indians, and Santa Rosa Band of Cahuilla Indians. The City received a response from Gabrieleño Band of Mission Indians—Kizh Nation during the consultation period and the Juaneño Band of Mission Indians after the consultation period ended. The City conducted consultation with the Gabrieleño Band of Mission Indians—Kizh Nation via email on March 9, 2026; and consultation with the Juaneño Band of Mission Indians via virtual meeting on March 19, 2026. Tribal consultation pursuant to AB 52 concluded on March 19, 2026 for the proposed project. Additionally, Tribal Consultation pursuant to SB 18 also concluded on March 19, 2026.

3. ENVIRONMENTAL EVALUATION

Although it is unlikely, ground-disturbing activities could unearth unknown TCRs, which is a potentially significant impact.

Impact TCR-1: Construction of the proposed project may encounter previously undiscovered tribal cultural resources.

Mitigation Measure TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.

- a) The project applicant/lead agency shall retain a Native American Monitor to observe ground-disturbing activities. The monitor shall be approved by the City in consultation with the Gabrieleño Band of Mission Indians – Kizh Nation, who were consulted pursuant to AB 52. The monitor shall be retained prior to the commencement of any “ground-disturbing activity” for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). “Ground-disturbing activity” shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.
- b) A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.
- c) The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or “TCR”), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.
- d) On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Gabrieleño Band of Mission Indians – Kizh Nation, who were consulted pursuant to AB 52, from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Tribe to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Native American TCRs.

3. ENVIRONMENTAL EVALUATIONS

Mitigation Measure TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)

- a) Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 100 feet) and shall not resume until the discovered TCR has been fully assessed by the Native American monitor and/or archaeologist. The Gabrieleño Band of Mission Indians – Kizh Nation, who were consulted pursuant to AB 52, will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

Mitigation Measure TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects

- a) Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.
- b) If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.
- c) Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).
- d) Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.
- e) Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

Mitigation Measure TCR-4: Construction coordination meeting shall be conducted prior to start of ground disturbing work (grading, trenching, or excavation) with Qualified Archaeologist, Construction Contractor, and Gabrieleño Band of Mission Indians – Kizh Nation Tribal Representatives.

Significance After Mitigation: In the event tribal cultural resources are discovered, Mitigation Measure TCR-1 through TCR-4 provides guidelines for how to protect tribal cultural resources. Implementation of Mitigation Measure TCR-1 through TCR-4 would reduce impacts to less than significant.

3. ENVIRONMENTAL EVALUATION

XIX. Utilities and Service Systems

Would the project:

Issues	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

DISCUSSION

- a) *Would the proposed project 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?*

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Less-Than-Significant Impact.

Water Supply Facilities

Water service for the project site is provided by the Buena Park Water District (BPWD). BPWD supplies potable water to residential, commercial, and institutional users in Buena Park and obtains water from a combination of imported water sources and groundwater, consistent with regional water management plans. Existing water distribution facilities are in the vicinity of the project site and are capable of serving urban development.

The proposed project would connect to existing BPWD water infrastructure and would be required to comply with all applicable district requirements, including water conservation regulations and design standards. The project's water demand would be within the capacity planned for by the water service provider and would not require the construction of new or expanded off-site water supply facilities beyond those already planned.

Existing 8-inch and 4-inch water lines are present in Dr. Sam Way and Beach Boulevard adjacent to the project site. The existing water main in Beach Boulevard is the most optimal facility for direct points of connection with future private site water facility improvements. The proposed potable water system would be supplied through two new points of connection: one connection would be at the existing 8-inch main in Dr. Sam Way, and the other at the existing 10-inch main in Franklin Street. The connection in Franklin Street would be made along Darlington Avenue and require the main to cross over the Brea Creek Channel attached to the existing bridge. The proposed on-site water system would be private and looped internally.

The existing 8-inch public water line in Dr. Sam Way would be removed within the property boundary. The existing 8-inch public water line would be cut and plugged in Stanton Avenue outside of the project site.

The project site has an existing 8-inch fire service line that connects to an 8-inch water main in Dr. Sam Way. Existing fire hydrants are located along Dr. Sam Way and Beach Boulevard.

The proposed fire line would be supplied through connections to the existing water main in Beach Boulevard and Darlington Avenue to develop a looped fire suppression system with two points of connection. There are two existing fire hydrants on the eastern side of Beach Boulevard that can service the property. Pursuant to the California Building Code, the proposed project would install 11 new fire hydrants on the project site. The existing fire line loop would be removed and a new private fire line loop constructed.

Therefore, impacts related to water supply would be less than significant.

Wastewater Treatment

Wastewater service for the project site is provided by the City of Buena Park through local collection lines, with regional treatment provided by the Orange County Sanitation District (OC

3. ENVIRONMENTAL EVALUATION

San). OC San operates regional wastewater treatment facilities that serve Buena Park and other jurisdictions within northern Orange County.

The proposed project would discharge wastewater into the existing municipal sewer system and would be required to comply with all City and OC San requirements. Adequate wastewater collection and treatment capacity exists to serve the proposed development, and the project would not result in the need for new or expanded wastewater treatment facilities beyond those planned by OC San.

Existing 8-inch City gravity sanitary sewer lines are present in Dr. Sam Way and Beach Boulevard adjacent to the project site. The 8-inch sewer line in Dr. Sam Way flows westerly, which continues south to Beach Boulevard. This line ties into the 10-inch main sewer line at Beach Boulevard and continues east under the railroad tracks. The 8-inch sewer line in Beach Boulevard flows southerly to connect to a 10-inch line at Beach Boulevard and Dr. Sam Way intersection. Laterals extend to the site in multiple locations along these two main sewer lines.

The proposed uses would be served by a gravity system. The existing connection points to the sewer mains in Beach Boulevard and Dr. Sam Way are the most optimal facilities for a direct point of connection. The existing 8-inch public sewer line in Dr. Sam Way would reroute between two existing sewer manholes at the east and west sides of the alley. This line would remain public and would require a public utility easement.

A sewer system capacity study was completed to determine the anticipated wastewater flow demands of the development. It determined that there is sufficient capacity available in the existing City sewer mains to accept the anticipated flow.

Accordingly, impacts related to wastewater service would be less than significant.

Storm Drainage

Stormwater drainage for the project site is managed by the City of Buena Park storm drain system, which ultimately connects to regional flood control facilities operated by the Orange County Flood Control District. Stormwater runoff from the site would be conveyed through existing and on-site drainage facilities designed in accordance with City standards.

The project would be required to comply with applicable stormwater regulations, including preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) during construction and compliance with post-construction stormwater quality requirements. These measures would ensure that stormwater runoff is properly managed and that water quality impacts are minimized. The project would not substantially alter existing drainage patterns or require new regional storm drainage facilities. Therefore, impacts related to storm drainage would be less than significant.

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Other Utilities

Electricity Facilities

Southern California Edison (SCE) is the primary electric utility. SCE owns and operates the electrical distribution infrastructure (poles, wires, transformers) that serves the City. In addition, Buena Park participates in the Orange County Power Authority (OCPA), a community choice aggregation (CCA) program that procures electricity on behalf of customers and allows selection of renewable energy content; however, SCE continues to deliver the electricity through its existing distribution system and serves as the default transmission and distribution provider.

Natural Gas Facilities

Natural gas service to the project area is provided by Southern California Gas Company (SoCalGas), the primary natural gas utility in Buena Park. SoCalGas owns and operates the distribution pipelines that deliver natural gas for space heating, water heating, and other residential and commercial uses. Service extensions and capacity are provided in accordance with SoCalGas policies and regulatory requirements.

Telecommunication Facilities

Telecommunications services (including telephone, high-speed internet, and cable) are available through multiple providers in Buena Park. Primary telecommunications providers include AT&T for traditional telephone and internet services, as well as Spectrum and Cox Communications for cable television and broadband internet. These companies maintain the local distribution infrastructure (underground and overhead facilities) necessary to serve residential and commercial development in the area.

Impacts to electricity, natural gas, and telecommunication would be less than significant.

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

Less-Than-Significant Impact. Water service for the proposed residential development would be provided by the Buena Park Water District. BPWD supplies potable water to residential, commercial, and institutional users in the city through a diversified portfolio of imported water and local groundwater sources. BPWD plans for long-term water reliability through its Urban Water Management Plan (UWMP), which evaluates water supply availability under normal, single-dry, and multiple-dry year conditions, in accordance with State requirements.

The proposed residential project would result in an incremental increase in water demand that would be consistent with growth projections accounted for in BPWD's long-range planning.

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documents. The project would be required to comply with all applicable State and local water conservation measures, including installation of water-efficient indoor plumbing fixtures, drought-tolerant landscaping, and efficient irrigation systems pursuant to current water efficiency standards. These measures would reduce per-capita residential water demand.

Additionally, the project would be subject to BPWD's water shortage contingency measures, should such measures be implemented during periods of reduced water supply. Based on BPWD's planned water supplies, existing infrastructure capacity, and the incorporation of mandatory water conservation requirements, sufficient water supplies would be available to serve the proposed residential project and reasonably foreseeable future development during normal, dry, and multiple dry years.

Therefore, the proposed project would not result in a significant impact related to water supply, and impacts would be less than significant.

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

Less-Than-Significant Impact. Wastewater generated by the proposed residential project would be conveyed through the City of Buena Park's local sewer collection system and treated at regional wastewater treatment facilities operated by the Orange County Sanitation District. OC San provides wastewater treatment services for Buena Park and other jurisdictions within northern Orange County and plans for wastewater collection and treatment capacity through long-range capital improvement and facility planning programs.

The proposed project would generate an incremental increase in wastewater flows that would be typical of residential development and would be within the capacity of the existing municipal collection system and OC San's regional treatment facilities. OC San has adequate treatment capacity to serve projected growth within its service area, including development consistent with adopted land use plans. The proposed project would be required to comply with all applicable City and OC San requirements, including connection permits and capacity-related regulations.

Based on the existing and planned wastewater treatment capacity and the project's consistency with adopted growth assumptions, the proposed project would not require the construction of new or expanded wastewater treatment facilities beyond those planned by OC San. Therefore, the project would not result in a determination by the wastewater treatment provider that it lacks adequate capacity to serve the project's projected demand in addition to existing commitments. Impacts related to wastewater treatment capacity would be less than significant.

- d) ***Would the proposed project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?***

3. ENVIRONMENTAL EVALUATIONS

Less-Than-Significant Impact. Solid waste generated by the proposed residential project would be collected and disposed of in accordance with the City of Buena Park's solid waste management system. Solid waste collection services in Buena Park are provided by the City's franchised waste hauler, and refuse is transported to regional landfill facilities with adequate permitted capacity. The City participates in countywide and statewide solid waste planning efforts that ensure long-term disposal capacity and compliance with applicable regulations.

The proposed project would generate solid waste typical of residential development and would not exceed the capacity of existing solid waste collection, transfer, or disposal facilities. In addition, the project would be required to comply with all applicable State and local solid waste reduction requirements, including Senate Bill 1383, which mandates the reduction of organic waste disposal and increased recycling, and Assembly Bill 341, which establishes recycling requirements for multifamily residential development. Compliance with these requirements would include provision of adequate on-site recycling and organic waste collection facilities.

With adherence to applicable solid waste diversion and recycling requirements, the proposed project would not generate solid waste in excess of State or local standards, would not exceed the capacity of local solid waste infrastructure, and would not impair the attainment of solid waste reduction goals. Therefore, impacts related to solid waste generation and disposal would be less than significant.

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

Less-Than-Significant Impact. The proposed residential project would be required to comply with all applicable federal, state, and local statutes and regulations related to solid waste management and reduction. Applicable regulations include the California Integrated Waste Management Act (AB 939), which establishes waste diversion goals; AB 341, which requires commercial and multifamily residential recycling programs; and SB 1383, which mandates the reduction of organic waste disposal through recycling and composting programs. These statutes are implemented at the local level through the City of Buena Park's solid waste ordinances and franchise agreements.

The project would provide adequate on-site facilities for solid waste, recycling, and organic waste collection consistent with City requirements and would participate in the City's franchised waste collection program. During construction, the project would also be required to comply with applicable construction and demolition waste diversion requirements, which would reduce the amount of waste disposed of in landfills.

Compliance with these federal, state, and local solid waste management and reduction requirements would ensure that the proposed project supports applicable waste diversion goals and regulatory mandates. Therefore, the project would comply with applicable solid waste statutes and regulations, and impacts related to solid waste management and reduction would be less than significant.

3. ENVIRONMENTAL EVALUATION

XX. Wildfire

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

Issues	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Wildland fire protection in California is the responsibility of the local, state, or federal government. In state responsibility areas, the State of California has the primary financial responsibility for the prevention and suppression of wildland fires. The California Department of Forestry and Fire Protection (CAL FIRE) provides a basic level of wildland fire prevention and protection services. CAL FIRE assigns areas to a Fire Hazard Severity Zone (FHSZ) based on factors that influence fire likelihood and behavior. FHSZs range from moderate to high to very high (CAL FIRE 2025).

Local responsibility areas (LRA) include incorporated cities, cultivated agricultural lands, and portions of the desert. LRA fire protection is typically provided by city fire departments, fire protection districts, county fire departments, or CAL FIRE under contract to local government.

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LRAs use the same Fire Hazard Severity Zone model for evaluating fire hazard in LRAs. CEQA evaluates land located in or near state responsibility areas or lands classified as a very high FHSZ.

DISCUSSION

- a) *Would the proposed project substantially impair an adopted emergency response plan or emergency evacuation plan?*
- b) *Would the proposed project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*
- c) *Would the proposed project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*
- d) *Would the proposed project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

No Impact. These significance criteria apply to projects in or near state responsibility areas or a Very High Fire Hazard Severity Zone (FHVS). The project site is in a local responsibility area and in a developed area of Buena Park. The project site is not in or near a state responsibility area, nor is it in a Very High FHVS. The nearest Very High FHVS is approximately 2.8 miles north (CalFire 2025). Therefore, no impact would occur.

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XXI. Mandatory Findings of Significance

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

DISCUSSION

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

Less-Than-Significant Impact with Mitigation Incorporated. As discussed in this Initial Study, the proposed project would not degrade the quality of the environment with implementation of

3. ENVIRONMENTAL EVALUATIONS

mitigation measures. As discussed in Section VII, *Geology and Soils*, with implementation of mitigation measure GEO-1, the proposed project would result in a less-than-significant impact on paleontological resources; and as discussed in Section V, *Cultural Resources*, and Section XVIII, *Tribal Cultural Resources*, with implementation of the Mitigation Measures CUL-1 and TCR-1 through TCR-4, the proposed project would result in a less-than-significant impact on archaeological and tribal cultural resources.

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

Less-Than-Significant Impact. Under Section 15065(a)(3), *Mandatory Findings of Significance*, of the CEQA Guidelines, a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has potential environmental effects “that are individually limited but cumulatively considerable.” As defined in Section 15065(a)(3) of the CEQA Guidelines, “cumulatively considerable” means “that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.”

As described in the Traffic Impact Analysis (Appendix I), there are five projects near the project site that are either proposed or under construction; however, only the following two projects are located adjacent to the project site:

- **7862 Craig Avenue Project**, approximately 120 feet west of the project site. This project includes 12 multifamily dwelling units.
- **5742 Beach Boulevard Project**, approximately 200 feet south of the project site. This project would consist of a 5-story mixed-use building with one level of subterranean parking. The project includes 39,449 sf of commercial space, a 3-story parking structure, and 81 market rate senior apartments. This project has not been approved yet.

While overlapping construction schedules may result in cumulative noise and air quality impacts, these effects are expected to be temporary. All activities must comply with local noise ordinances and restricted work hours. Furthermore, individual projects are required to implement site-specific mitigation measures to ensure that any potential environmental impacts remain below a level of significance.

Based on the preceding analysis, including consideration of nearby proposed development, with implementation of mitigation measures and compliance with existing regulations, the proposed project would not result in significant adverse impacts that could contribute to a cumulatively considerable impact. In consideration of the preceding analysis, the proposed project’s contribution to cumulative impacts would be less than significant, and therefore project impacts would not be cumulatively considerable

3. ENVIRONMENTAL EVALUATION

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

Less-Than-Significant Impact with Mitigation Incorporated. As discussed in the previous analyses, the proposed project would not result in significant direct or indirect adverse impacts or result in substantial adverse effects on human beings. Impacts would be less than significant with the implementation of the proposed mitigation measures for air quality geologic resources, cultural resources, noise, and tribal cultural resources.

3. ENVIRONMENTAL EVALUATIONS

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5. LIST OF PREPARERS

LEAD AGENCY

City of Buena Park

Harald Luna, Planning Division Manager

Ian McAleese, Senior Planner

ENVIRONMENTAL CONSULTANT

PlaceWorks

Malia Durand, Principal

Alen Estrada-Rodas, Senior Associate

John Vang, Senior Associate, Air Quality/Greenhouse Gas Emissions

Emily Parks, Associate, Air Quality/Greenhouse Gas Emissions

Chris Shields, Senior Associate, Noise

Natalie Phan, Project Planner

Itzeel Padilla, Project Planner

Cary Nakama, Graphic Artist

Gina Froelich, Senior Editor

Laura Muñoz, Document Specialist

5. LIST OF PREPARERS

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