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DRAFT Initial Study
Anaheim Five Coves (Northern Extension) Park Project
City of Anaheim, Orange County, California

Orange, CA USGS Topographic Map 33117-G7 (1981)
Latitude (North): 33.8395000—33°50'22.20"
Longitude (West): 117.8645000—117°51'52.20"

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Date: December 21, 2016

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SECTION 1: INTRODUCTION

1.1 - Purpose

Pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code, Section 21000 et seq.), this Initial Study has been prepared in accordance with CEQA Guidelines and the City of Anaheim Local CEQA Environmental Procedures. This Initial Study has been prepared to identify and evaluate short-term construction-related impacts and long-term operational impacts associated with the implementation of the Anaheim Five Coves (Northern Extension) Park Project (Proposed Project). CEQA requires that all state and local government agencies consider the environmental consequences of projects over which they have discretionary authority before taking action on them. Pursuant to Section 15367 of the CEQA Guidelines, the City of Anaheim is the Lead Agency and has the principal responsibility of approving and implementing the Proposed Project. Portions of the trail project are located on Southern California Edison (SCE),Orange County Water District (OCWD), and Orange County Flood Control District (OCFCD) property, and all are responsible agencies with permit and approval authority for the Project.

In accordance with Section 15063 of the CEQA guidelines, the Initial Study would provide the City of Anaheim with information to use as the basis for deciding whether to prepare an Environmental Impact Report (EIR), a Negative Declaration, or a Mitigated Negative Declaration (MND) for the Project. If the City finds that there is no evidence that the Project, as proposed or as modified, is to include the mitigation measures identified in the Initial Study, may cause a significant effect on the environment, the City shall prepare either a Negative Declaration or Mitigated Negative Declaration for the Project. CEQA Guidelines Section 15382 defines a "significant effect on the environment" as a substantial, or potentially substantial adverse change in any of the physical conditions within the area affected by the Project, including land, air, water, mineral, flora, fauna, ambient noise and object of historic or aesthetic significance.

As identified in Section 2 of this document, the City, SCE, OCWD, and OCFCD have found that although the Proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because all parties have agreed to revisions (i.e., mitigation measures). Therefore, a Mitigated Negative Declaration (MND) has been selected as the appropriate documentation for the Proposed Project. Prior to any approvals for the Proposed Project, the MND will need to be approved. Therefore, the City, SCE, OCWD, and OCFCD will need to approve the MND for their respective project approvals identified in Section 1.5 of this document.

1.1.1 - Statutory Authority and Requirements

Section 15063 of the CEQA Guidelines identifies specific disclosure requirements for inclusion in an Initial Study. Pursuant to these requirements, an Initial Study shall include:

- A description of the Proposed Project;
- Identification of the environmental setting;

- Identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries;
- Discussion of ways to mitigate significant effects identified, if any;
- Examination of whether the Project is compatible with existing zoning, plans, and other applicable land use controls; and
- The name of person who prepared, or participated in the preparation of, the Initial Study.

1.2 - Project Description

The City of Anaheim, through a Memorandums of Understanding and property lease agreements with SCE, the OCWD, and OCFCD, is proposing to develop a 9-acre linear urban nature park (Anaheim Five Coves (Northern Extension) Park project, or Proposed Project) that would extend from Lincoln Street to Frontera Street. The Proposed Project is the second phase of the existing 14-acre Anaheim Coves Nature Park (Phase 1) and is a continuation of that park's 1.5-mile multi-use trail and native-plant greening effort for the area, located to the south of the Project site. The Anaheim Coves Nature Park (Phase 1) has restroom facilities and parking, located on the southern side of Lincoln Avenue. The Proposed Project would connect to the trail and facilities in the Anaheim Coves Nature Park (Phase 1) through an existing tunnel under Lincoln Avenue. The Proposed Project would serve to connect the existing Anaheim Coves Nature Park (Phase 1) trail to Frontera Street and Glassell Street/Kraemer Boulevard, to the Anaheim Canyon Business District, and the greater Santa Ana River Trail (SART) system.

The linear urban nature park would be approximately 1 mile long and ranges from 30 feet at its narrowest point to 87 feet at its widest point. The urban nature park will include a 0.9-mile Class 1 permeable asphalt bike path parallel to a stabilized decomposed granite multi-use trail (trail). A Class 1 bike path provides a completely separated right of way for the exclusive use of bicycles and pedestrians. The urban nature park would also include a demonstration garden/children's education/nature play area and the installation of native vegetation and earthen swales for stormwater capture throughout the length of the park. The project location and existing conditions, proposed improvements, access, construction activities, and operation/maintenance associated with the Project are discussed further in the following sections.

1.2.1 - Project Location and Existing Conditions

The project site is located in the City of Anaheim, Orange County, California (see Exhibit 1: Regional Location Map). The site is bound by E. Lincoln Avenue to the south and E. Frontera Street to the north (see Exhibit 2: Local Vicinity Map, Aerial Base). The Project site is situated within an urbanized area and is surrounded by residential uses and groundwater management facilities and flood control facilities operated and maintained by the OCWD and OCFCD. On the east, the Project site runs parallel to OCWD groundwater recharge ponds, and then east of the ponds is the Santa Ana River. West of the site are single-family residential homes. Immediately north of the site lies Frontera Street and the 91

Freeway. To the south, and as described above, is the existing 14-acre Anaheim Coves Nature Park (Phase 1). The Anaheim Canyon Business District is located north of the 91 Freeway and will be connected to the Proposed Project via Class II bicycle facilities on Frontera Street and Glassell Street/Kraemer Boulevard.

- West—the properties west of the Project site primarily consist of single-family residential uses. The residential uses consist of a combination of one and two story structures that have intermittent views of the site.
- East—the site runs parallel to the Santa Ana River and OCWD groundwater recharge ponds, known as the Five Coves groundwater recharge basins.
- North—north of the Project site, north of E. Frontera Street and the 91 Freeway, is the Anaheim Canyon Business District, Anaheim's 2,500-acre industrial complex where approximately 1/3 of the City's workforce is located. The Anaheim Canyon will be connected to the Proposed Project via Class II bicycle facilities on Frontera Street and Glassell Street/Kraemer Boulevard.
- South—South of the Project site, south of E. Lincoln Avenue is the existing Anaheim Coves and trail (Phase I trail), a 14-acre nature park with a 1.5 mile multi-use permeable asphalt trail, restroom facilities, and parking, located on the southern side of Lincoln Avenue.

The Project site is made up of parts of 10 parcels: seven are owned by OCWD, two are owned by OCFCD, and one is owned by SCE. The parcels are described in greater detail in Table 1: Project Site Assessor Parcel Number Data: Project Site Assessor Parcel Number Data. The parcels are zoned Transition (T), with the exception of one parcel owned by OCWD that is in Unincorporated Orange County. The parcels are a mix of general plan designations: Water, Open Space, Parks, Residential Low, and Residential Medium. Exhibit 3: Assessor's Parcel Map, shows the assessors parcels for the Project site.

Table 1: Project Site Assessor Parcel Number Data

Assessor's Parcel Number	Parcel Owner	Parcel Size (in acres)	General Plan Designation	Zoning
268-081-04	OCWD	2.99	Water (OS-W); Open Space (OS)	Transition (T)
268-081-03	OCWD	0.11	Open Space (OS)	Transition (T)
268-121-04	SCE	1.14	Water (OS-W)	Transition (T)
360-021-16	OCFCD	1.28	Water (OS-W)	Transition (T)
360-021-03 (Unincorporated Orange County)	OCWD	21.68	Water (OS-W)*	Unincorporated
268-131-09	OCFCD	2.68	Water (OS-W); Residential-Medium (R-M)	Multiple-Family Residential (RM-4)

Table 1 (cont.): Project Site Assessor Parcel Number Data

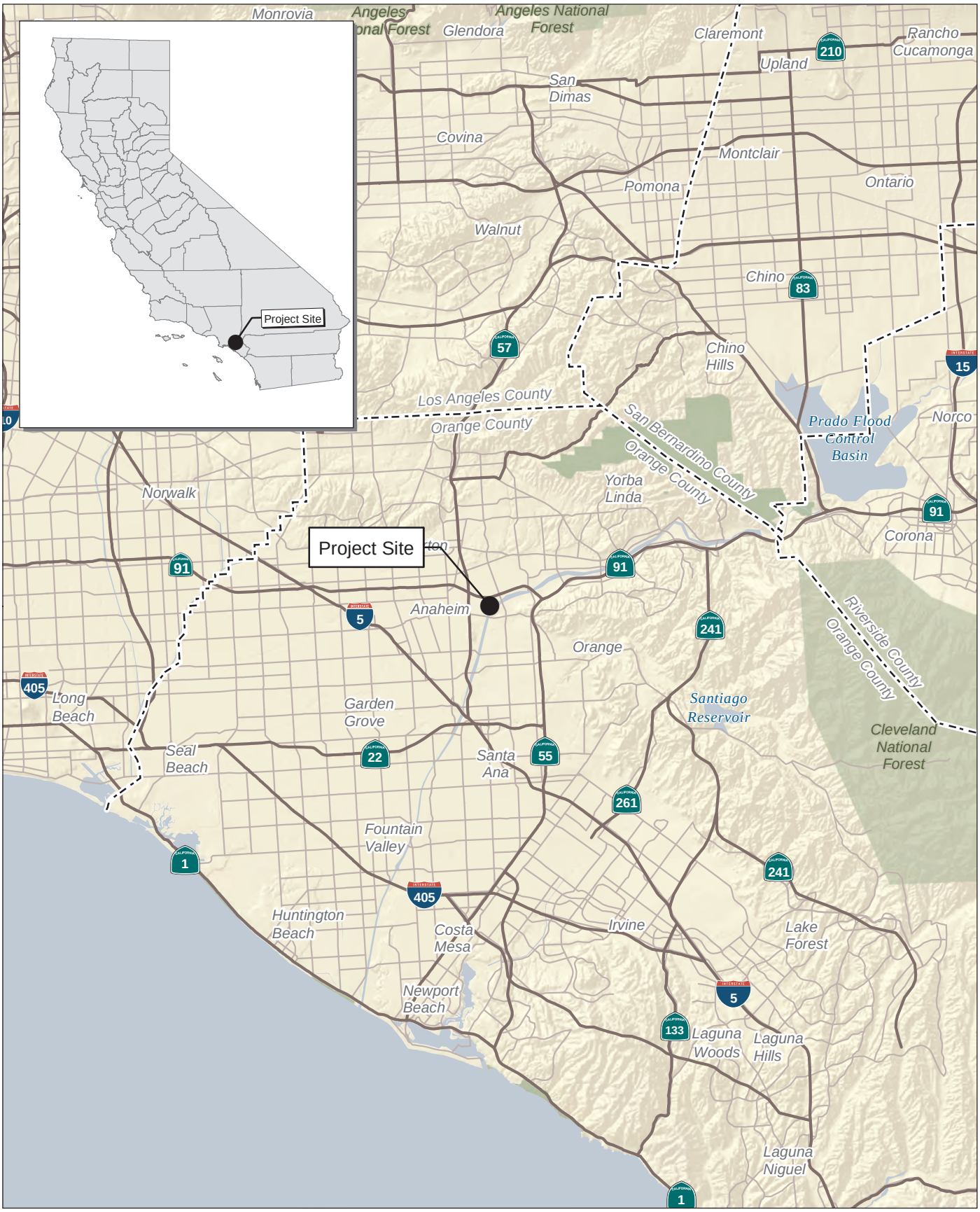
Assessor's Parcel Number	Parcel Owner	Parcel Size (in acres)	General Plan Designation	Zoning
268-081-05	OCWD	49.82	Water (OS-W); Open Space (OS)	Transition (T)
268-081-02	OCWD	1.1	Water (OS-W); Open Space (OS)	Transition (T)
253-271-07	OCWD	11.51	Parks (OS-P); Water (OS-W)	Transition (T)
253-271-04	OCWD	1.41	Residential-Low (R-L); Open Space (OS)	Transition (T)
Source: City of Anaheim Parcel Finder. 2016. http://gis.anaheim.net/ParcelInfo/Disclaimer.aspx. Accessed December 14, 2016.				

The groundwater management and flood control facilities adjacent to the site are actively maintained for their proposed uses, yet provide open space and open water habitat value for the area. In the vicinity of the Project site are the following groundwater management and flood control facilities: Five Coves Basin, Lincoln Basin, Burris Basin, Santa Ana River and the Carbon Canyon Diversion Channel Surface water flows are diverted off the Santa Ana River to this 125-acre basin area for groundwater recharge to the Orange County Groundwater Basin. These facilities are described in more detail in Section 3.4, Biological Resources and the basins are indicated on Exhibit 4: Site Plan and Exhibit 5: Project Overview Map. The groundwater recharge ponds immediately adjacent to the Project site are the Five Coves groundwater recharge basins.

Prior to being operated as a groundwater management basin, the Five Coves Basin area was a gravel quarry for sand and gravel mining. The majority the ground cover around the basin has been disturbed and modified from the sand and gravel operations and from OCWD's groundwater management activities.

The Carbon Canyon Diversion Channel is a flood control channel that extends from OCWD Miller Basin to the Santa Ana River. A 1.5-acre segment of the Carbon Canyon Diversion Channel represents the northeastern-most boundary of the Project site. This 1.5-acre segment of the channel with lined with rip rap rock sides and has soft rocky bottom. The diversion channel is separated from the Project site by a chain link fence.

The majority of the Project site has been utilized as staging areas for heavy equipment for maintenance activities at Five Coves Basin. Three vegetation communities/habitat types occur within the Project site. These include ornamental grove vegetation, ruderal field vegetation, and developed areas. Developed areas are not considered habitat for any plant or animal species as the areas are currently paved, covered in gravel, or are subject to vehicle traffic frequently enough to hinder any vegetative growth.



Source: Census 2000 Data, The CaSIL, FCS GIS 2013.

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Exhibit 1
Regional Location Map

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Source: ESRI Imagery, 2015

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1,000 500 0 1,000 Feet

Exhibit 2
Local Vicinity Map
Aerial Base

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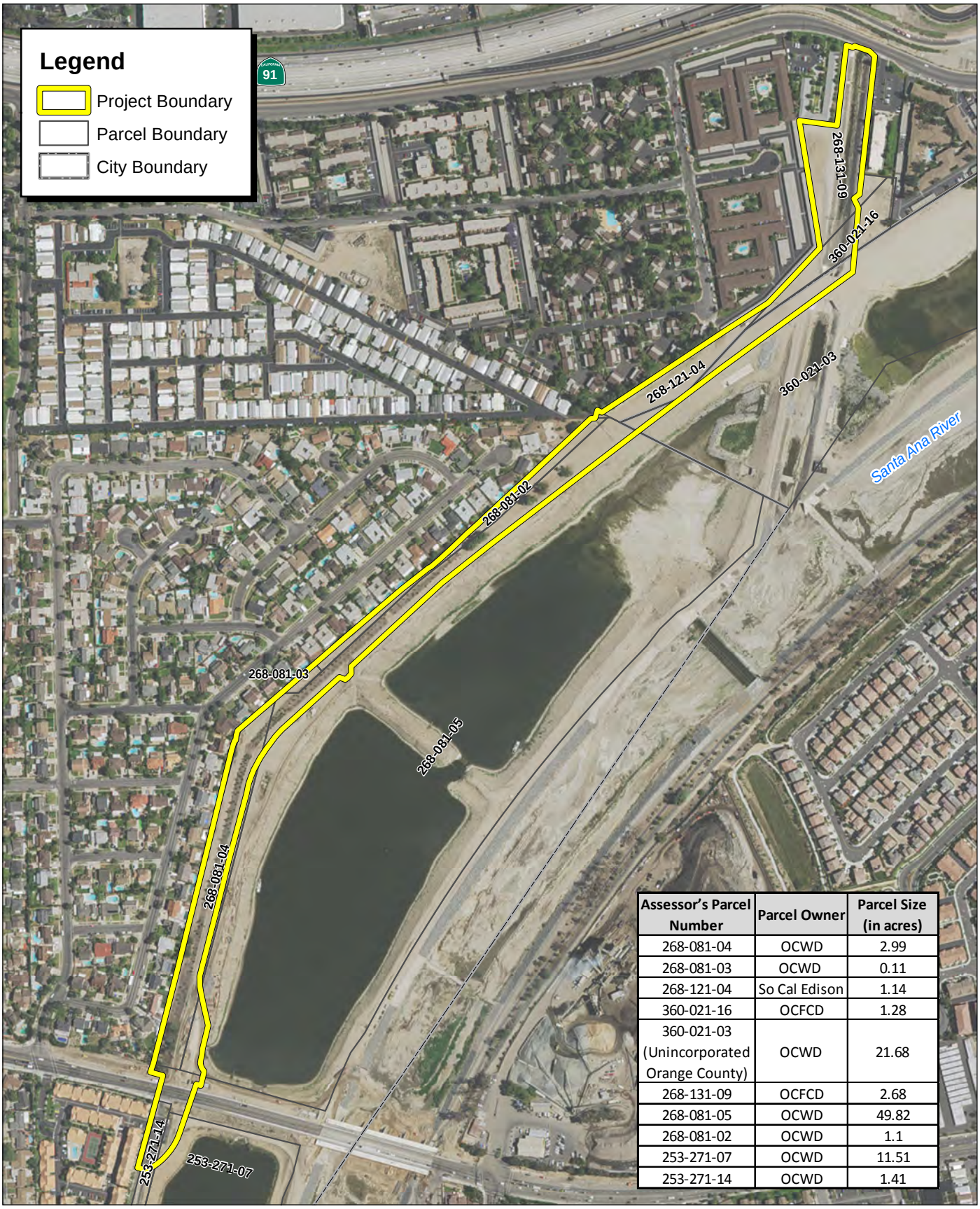

Assessor's Parcel Number	Parcel Owner	Parcel Size (in acres)
268-081-04	OCWD	2.99
268-081-03	OCWD	0.11
268-121-04	So Cal Edison	1.14
360-021-16	OCFCD	1.28
360-021-03 (Unincorporated Orange County)	OCWD	21.68
268-131-09	OCFCD	2.68
268-081-05	OCWD	49.82
268-081-02	OCWD	1.1
253-271-07	OCWD	11.51
253-271-14	OCWD	1.41

Source: ESRI Imagery, 2015

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510 255 0 510 Feet

Exhibit 3
Assessor's Parcel Number Map

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Source: Moore Iacofano Goltsman, Inc 2015

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Exhibit 4
Site Plan

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Source: Orange County Water Distric

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Exhibit 5
Project Overview Map

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At the southern end of the Project site near Lincoln Avenue is a cluster of ornamental trees ranging in height from 6 to 25 feet. These trees include a combination of Aleppo pine (*Pinus halepensis*), lemon-scented gum (*Eucalyptus citriodora*), silk oak (*Grevillea robusta*), and Canary Island pine (*Pinus canariensis*). Located along the residential homes lining the Project site is an assortment of ornamental vines and vegetation.

The maintenance access road is separated from the Five Coves groundwater recharge basins by a chain-link fence placed approximately 25 feet out from the edge of the basin along the eastern boundary. Adjacent to this fence is an unpaved access road/open area that is owned and operated by OCWD. The OCWD uses the unpaved road/open area to access the Five Coves groundwater recharge basins and other associated infrastructure, adjacent to the Santa Ana River. SCE and OCFCD also use portions of their parcels to access their infrastructure on the project site. OCFCD has used the triangular parcel at the northernmost end of the Project site, located between the Carbon Canyon Diversion Channel and multi-family residential housing as a staging area in the past. The demonstration garden/children's education/nature play area will be located on this parcel.

Between the unpaved road/access area and the Project site is the OCWD Five Coves Mitigation Site. This mitigation area includes a linear riparian tree grove and a freshwater marsh in the northern portion of the basin. Under existing conditions, the Proposed Project site is used, in part, to access the native vegetation mitigation areas affiliated with the basin. To compensate for impacts to Waters of the U.S. and Waters of the State associated with implementation of the OCWD Groundwater Recharge Facilities Maintenance Plan, OCWD has prepared and is currently implementing the OCWD Habitat Management Plan, which details OCWD compensatory mitigation requirements. The OCWD Habitat Management Plan has been prepared in accordance with the United States Army Corps of Engineers (USACE) Final Rule on Compensatory Mitigation for Losses of Aquatic Resources and has been prepared to meet the California Department of Fish and Wildlife compensatory mitigation requirements for a Streambed Alternation Agreement and the Regional Water Quality Control Board compensatory mitigation requirement for 401 Water Quality Certification. Under the terms of the OCWD Habitat Management Plan, OCWD is required to provide approximately 2.0 acres of mitigation area each year for the life of the regional maintenance permits. The OCWD Habitat Management Plan identifies seven mitigation sites and a combination of restoration activities proposed at each mitigation site. Additionally, the OCWD Habitat Management Plan establishes mitigation monitoring procedures, performance standards and adaptive management measures to ensure the success of each mitigation site. One of the seven mitigation sites included in OCWD Habitat Management Plan is the Five Coves Basin Mitigation Site. The intent of the Five Coves Mitigation Site is to create native open space buffer between Five Coves Basin and existing residential land uses that would foster wildlife management, while allowing groundwater management activities to occur in Five Coves Basin. The Five Coves Mitigation Site was planted in 2010 and 2014 and has been monitored in accordance with the Orange County Habitat Management Plan. As of 2015, the mitigation area has achieved all of its annual growth performance requirements.

The project site contains a cinderblock wall along the western boundary and chain-link gates at the northern and southern boundaries. There is also a chain-link gate in the northern section, where the trail turns to parallel the Carbon Canyon Diversion Channel.

Parking for the Proposed Project is available at the Ball Road restroom (part of the Anaheim Coves Nature Park (Phase 1)), along the park frontage on Rio Vista Street, and at the Lincoln Avenue restroom.

1.2.2 - Proposed Improvements

The City of Anaheim proposes to construct the Anaheim Coves, Northern Extension Project, a 9-acre linear urban nature park with a 0.9-mile, Class 1, permeable asphalt bicycle trail and stabilized decomposed granite multi-use trail, and a 0.75-acre demonstration garden/children's education/ nature play area with nature-based play amenities. The multi-use trail will accommodate pedestrian, cycle, and equestrian use. The Class 1 bicycle path will accommodate recreational as well as commuter bicyclists, and is categorized as a Class 1 bike path by the California Department of Transportation because it provides a completely separated right-of-way for the exclusive use of bicycles and pedestrians with cross-flow of traffic minimized (Caltrans 2015).

The trail would extend from Lincoln Avenue to Frontera Street, generally following the existing unimproved area adjacent to the residential homes that are on the western side of the Five Coves groundwater recharge basins area (Exhibit 4: Site Plan and Exhibit 5, Project Overview Map). The proposed trail is both a bike path and a pedestrian/equestrian trail with amenities for each type of recreational use. Per Caltrans standards, the bike path will be 10 feet wide and constructed of permeable, porous asphalt surface. The pedestrian/equestrian trail would vary from 4 to 10 feet wide and be constructed of stabilized decomposed granite. All of the trail surfaces are made of permeable materials in order to allow for water percolation, which will minimize stormwater runoff from the site (Exhibit 6: Typical Trail Cross Section).

The urban nature park will be planted with native shade trees, locally native shrubs, native grasses, and vegetative bioswales consistent with the plantings in the mitigation areas on-site. The Project will remove eleven trees at southern end of the Project site near Lincoln Avenue. This will include the removal of three Aleppo pine (*Pinus halepensis*), two lemon-scented gum (*Eucalyptus citriodora*), two silk oak (*Grevillea robusta*), and four Canary Island pine (*Pinus canariensis*), all to be replaced with native vegetation. The two lemon-scented gum trees and the four Canary Island pine trees are considered specimen trees by the Anaheim Municipal Code and will be replaced with trees on the City's specimen tree list. Native plantings will also be installed adjacent to the residential homes on the western side of the trail and throughout the park, as discussed below. Drip/low water use type irrigation will be utilized on-site until the plants are established, and then will be used periodically to maintain the vegetation if necessary in the summer months. The development and landscaping of the urban nature park will result in a net export of soil.

The trail will run in a north-south orientation, and plantings with native vegetation found in the Santa Ana River Bioregion will be installed, including native shrubs, groundcovers and grasses as appropriate to the site will line both sides of the trail. The native planting area bound by the eastern portion (basin side) of the trail will be separated from the trail by a split-rail fence. This planting area on the basin side of the trail will also be separated from the trail by a rock-lined, earthen stormwater swale, which will function to route and capture stormwater from the trail. Adjacent to the homes

located on the west side of the trail (residential side) plantings with native vegetation found in the Santa Ana River Bioregion will be installed, including native shrubs, groundcovers and grasses as appropriate to the site. The species to be planted were selected according to homeowner preference. Homeowners were provided with a list of viable native species to select from in 2016. The planting area on the residential side of the trail will be 20 feet wide, where possible.

The triangular parcel owned by SCE and generally bound by the unpaved access road/open area and diversion channel to the east and the Colony Frontera Apartments property on the northern end of the park site will be the location of the demonstration garden/children's education/nature play area. This approximately 0.75-acre passive recreational area will include decomposed granite paths, native planting areas, and educational/interpretive areas as well as a portion of the trail.

Other improvements along the trail will be installed to accommodate pedestrian, equestrian, and cycling uses. The improvements include the following: observation and seating areas, bicycle racks, drinking fountains, an equestrian rest area, interpretative signage, an exercise area, pet waste dispensers, distance markers, recycle/trash containers, and downward-facing solar safety lighting at the entrances and at the exercise area.

1.2.3 - Access

The proposed Anaheim Coves (Northern Extension) Project, much like the Anaheim Coves Nature Park (Phase 1) to the south, is a walk-up/ride-up, neighborhood destination. The Proposed Project will connect the Anaheim Coves Nature Park (Phase 1) trail via the OCWD maintenance access road, which utilizes the Lincoln Avenue underpass tunnel to connect the two trail segments. The tunnel will be equipped with safety signage and lighting to prevent conflicts between trail users and OCWD maintenance vehicles. The bike lanes and sidewalks on Lincoln Avenue would also connect the two trail segments. The trail will be equipped with facilities for, and serve as a connector to, the greater Santa Ana River Trail (SART) system, which provides segments of trail, including Class I Bikeways along the Santa Ana River from the San Bernardino Mountains to the Pacific Ocean. These existing built reaches of the SART currently serve the needs of recreational pedestrians, bicyclists, and equestrians, and provide some commuters an opportunity for alternative means and routes of transportation, particularly to the nearby Anaheim Canyon Business District.

The trail has a split design that accommodates and divides each type of use (pedestrians, bicyclist, equestrian, ranger, and maintenance and emergency vehicles). On the eastern side of the trail, the trail is composed of stabilized decomposed granite for more passive uses (pedestrian, equestrian, and jogging). On the residential side of the trail, the trail is composed of permeable asphalt for bicycles (a Class 1 bicycle trail), and vehicular uses (ranger patrols, maintenance, and emergency vehicles). The emergency access points are located at Armando Street, Frontera Street, and Lincoln Avenue (Exhibit 4: Site Plan). The trail has been designed to allow for good visibility and to reduce conflict among the various modes of transportation.

The park will have three trail entry points, with welcome signage, entry kiosk, drinking fountain, recycle and trash containers, bike racks, solar lighting, and other amenities at each. Pedestrian and vehicle (as well as ranger and maintenance access) is available from Frontera Street and Lincoln

Avenues, with access to an existing 14-space parking lot and restroom facility at the Lincoln Avenue end of the Project site. The parking lot and restroom facility at Lincoln Avenue currently are and will remain locked at night. Additional pedestrian access is available through a neighborhood entrance, located at Armando Street (see Exhibit 4: Site Plan). Access to the site will be available 24 hours per day, 7 days per week in order to provide connectivity to the SART trail and to the Anaheim Canyon Business District, via Frontera Street and Glassell Street/Kraemer Boulevard, unless the area is deemed unsafe by either a rain event or other natural disaster. If the Project site is subject to natural or other disaster, the Community Services Department would be notified through the City's Emergency Operations Center by any of the following: OCFCD, USACE, Anaheim Police and Fire, and City of Anaheim Risk Management and Safety Officers. Upon notification, rangers or park maintenance staff would evacuate the area and lock the gates to restrict access.

SCE, OCWD, and OCFC each own portions of the Project site and have granted access and use rights to the City of Anaheim through lease and/or license agreements. Once the construction of the proposed Anaheim Coves Northern Extension is complete, the City of Anaheim will be responsible for the maintenance for the entire area, including the portions of the OCWD mitigation area adjacent to the trail.

Various fences and gates are proposed on-site. The approximately 20-foot-wide planting area adjacent to the trail will be separated from homes by the existing 5-foot-tall cinderblock wall. The OCWD mitigation area will be physically separated from the trail by a 4-foot-tall rail fence in certain locations to be constructed as part of the Project.

1.2.4 - Construction Activities

Construction activity associated with the Proposed Project is estimated to occur over the course of approximately 4-6 months, and is anticipated to commence in 2017. The first 4 months of construction will utilize heavy equipment, and then two additional months of construction activity will occur without heavy machinery for the installation of native plantings. Construction activities associated with the Proposed Project will occur in one 6-month phase, which will include such activities as demolition, mass grading, paving, and landscaping activities.

Grading activities on the Project site will require 2,000 cubic yards of soil to be excavated and potentially exported off the Project site, and every effort will be made to provide a balanced grading design so that soil excavation and export on the site are minimized. All project construction and equipment staging (including parking for construction employees) will be confined to the Project site. The proposed staging area will be able to accommodate staging of construction equipment as well as construction worker vehicles. The staging area is proposed to be located on the property that will eventually become the demonstration garden/children's education/nature play area (Exhibit 4: Site Plan). The number of combined construction equipment and construction worker vehicles will range from 10 to 20 vehicles. During the mobilization and demobilization of construction equipment, access to the site will be from gates on Lincoln Avenue and Frontera Avenue. All of the construction equipment would be staged on-site until construction is completed. The hours of construction will occur between 7:00 am and 5:00 p.m., Monday through Friday.

In no instance will construction, supplies, employees, or equipment encroach upon the OCWD mitigation area.

1.2.5 - Operation and Maintenance Activities

The proposed Anaheim Coves (Northern Extension) park will be open to the public on a daily basis. As a connector to the Class 1 Santa Ana River Trail, the trail will be open on a 24-hour-per-day, 7-day-per-week basis to accommodate cycle commuter access. As with the ongoing maintenance of the Anaheim Coves Nature Park (Phase 1), a maintenance crew of one to three employees will be on-site in the morning to remove litter from the receptacles and incidental litter pick-up. In addition, the maintenance crews will be responsible for landscape and other general maintenance. Park security will be provided by City of Anaheim Park Rangers and the Anaheim Police Department. Park security will patrol the park Monday through Friday from 1:30 p.m. to 10:30 p.m., and on Saturday and Sunday from 9:30 a.m. to 10:30 p.m. A Park Ranger will conduct a driving patrol of the accessible interior of the facility, with occasional foot patrol to inspect fencing and the facilities in general. Generally, patrols vary according to specific route and schedule, with rangers stopping periodically at points offering an overview of the patrol area. The 45- to 60-minute patrols of the Park would alternate with patrols of nearby city facilities such as Juarez and Rio Vista Parks. A full description of the Project's long-term operation and maintenance plan is contained in Appendix A, *City of Anaheim Community Services Department Anaheim Coves Operation and Maintenance Plan*, December 14, 2016.

1.3 - Intended Uses of this Document/Discretionary Approvals

The Initial Study prepared for the Anaheim Coves Northern Extension Park Project could be used as supporting documentation for the following potential project approvals if needed.

City of Anaheim

- Approval of the Mitigated Negative Declaration
- Approval of plans and specifications, including those for photovoltaic lighting on-site
- Approval of a Flat-Land Grading Permit from Department of Public Works
- Approval of the design of the interpretive signs
- Orange County Water District Property License Agreement
- City of Anaheim and OCWD Memorandum of Understanding (complete)

Orange County Water District

- Approval of the Mitigated Negative Declaration
- Approval of the design of the interpretive signs
- Orange County Water District Property License Agreement
- City of Anaheim and OCWD Memorandum of Understanding (complete)

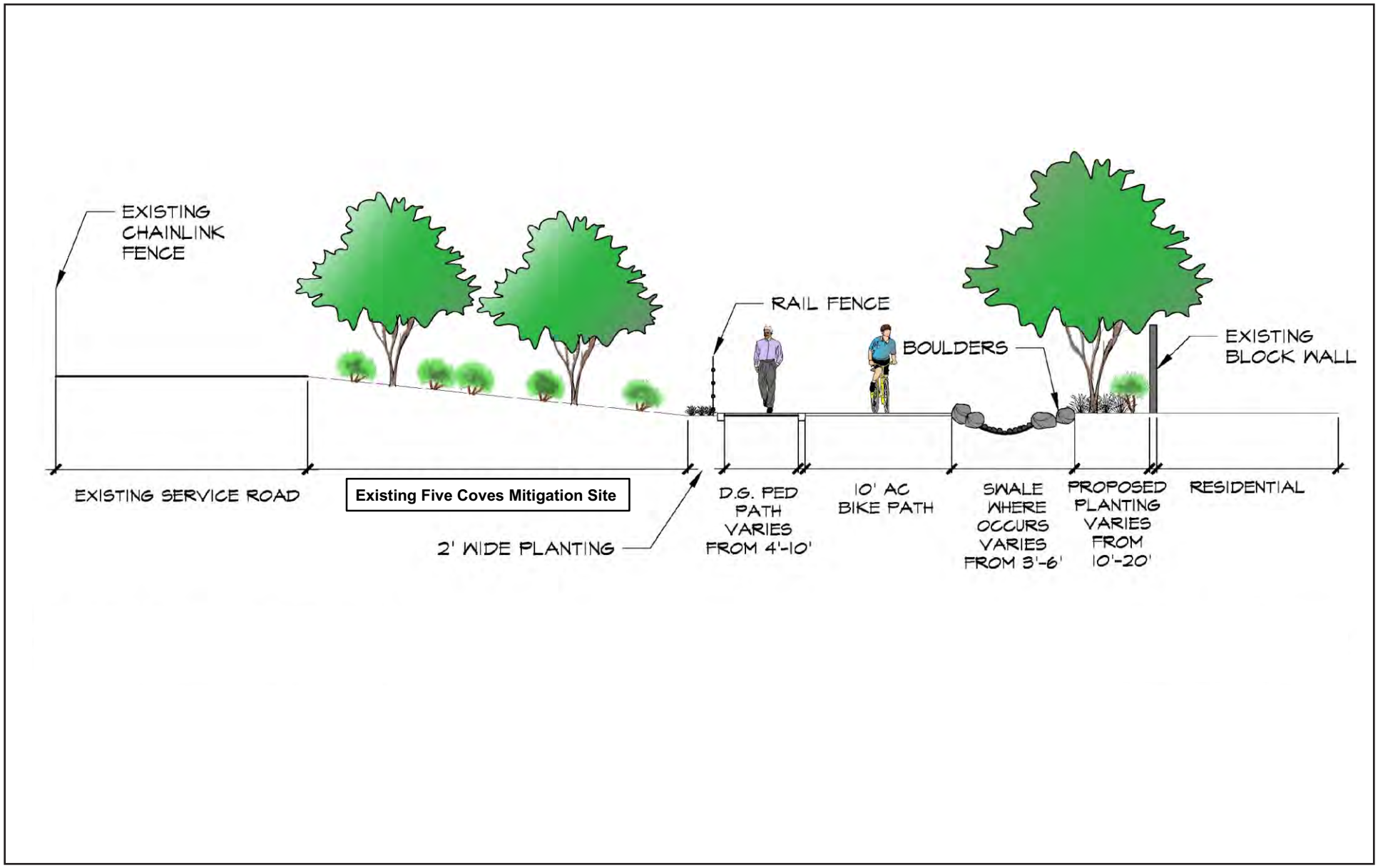
Orange County Flood Control

- Approval of the Mitigated Negative Declaration
- Approval of the design of the interpretive signs
- Orange County Flood Control Property Lease Agreement
- City of Anaheim and OCFC Memorandum of Understanding (complete)

Southern California Edison

- Approval of the Mitigated Negative Declaration
- Southern California Edison Property Lease Agreement
- City of Anaheim and SCE Memorandum of Understanding (complete)

In addition, the City is in the process of updating its Bicycle Master Plan and its General Plan to reflect bicycle facilities and parks that have been implemented since the City comprehensively updated both plans in 2004. The General Plan already designates the project site for Parks and Water Uses; the updates to the plans will specifically call-out the proposed park and Class 1 bicycle facility. Compliance with CEQA will be determined at the time these updates are reviewed by Planning Commission and City Council.



Source: Orange County Water District

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Exhibit 6
Typical Trail Cross Section

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SECTION 2: ENVIRONMENTAL FACTORS AND DETERMINATION

The environmental analysis for the Proposed Project is based on Environmental Checklist Form (as modified by the City of Anaheim) provided in Appendix G of the CEQA Guidelines. In accordance with Section 15150 of the CEQA Guidelines, an EIR or Negative Declaration may incorporate by reference all or portions of another document which is a matter of public record or is generally available to the public.

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

Environmental 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 measure 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.

Date: December 21, 2016 Signed: Christine Saunders

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SECTION 3: ENVIRONMENTAL CHECKLIST AND DISCUSSION OF ENVIRONMENTAL EVALUATION

3.1 - Aesthetics

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.1 Aesthetics *Would the project:*				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a state scenic highway?	☐	☐	☒	☐
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Environmental Evaluation

Would the project:

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

Less than significant impact. A scenic vista is defined as "a distant view through or along an avenue or opening." Scenic is typically correlated with landforms, (hills, valleys, mountains, sandy beaches, wildlife corridor, etc.) along some type of contiguous open space or natural landscape, which can be defined by grassland, desert, shrubs, or trees. While the Project site has scenic qualities, neither the Orange County General Plan nor Anaheim General Plan designates this location as an area with a scenic vista/view. The improvements proposed by the Project would generally enhance the visual characteristics of the site. At this time, the Project site is predominantly earthen with some vegetation existing in the OCWD mitigation area, and some ornamental trees at the southern portion of the Project site near Lincoln Avenue. The proposed improvements would include an urban nature park with a Class 1 bike path paved with permeable asphalt, a decomposed granite multi-use trail, a demonstration garden/children's education/nature play area, native planting areas on both sides of the trail—including the addition of 200 native trees, and vegetative bio swales for stormwater capture.

The urban nature park will be planted with native shade trees, locally native shrubs, native grasses, and vegetative bioswales consistent with the plantings in the mitigation areas on-site. The Project will remove eleven trees at southern end of the Project site near Lincoln Avenue on property owned by OCWD. The OCWD has granted permission to the City of Anaheim for the removal of the trees. This will include the removal of three Aleppo pine (*Pinus halepensis*), two lemon-scented gum (*Eucalyptus citriodora*), two silk oak (*Grevillea robusta*), and four Canary Island pine (*Pinus canariensis*), all to be replaced with native vegetation, including the planting of 200 native trees on the site.

The improvements also include observation and seating areas, bicycle racks, drinking fountains, interpretative signage, pet waste dispensers, distance markers, recycle/trash containers, and solar safety lighting. The installation of these attributes and facilities would not result in a substantial visual alteration of the existing views. The overall effect of the Project improvements will be similar to the recently completed Anaheim Coves Nature Park (Phase 1) trail. Exhibit 7: Visual Comparison of Anaheim Coves Nature Park (Phase 1) and Anaheim Five Coves (Northern Extension) Project Sites(Phase 1 and Phase 2) juxtaposes the current aerial view of Anaheim Coves Nature Park (Phase 1) with the Proposed Project site for contrast. The project includes the addition of substantial vegetation including trees and bushes that may alter open views to the recharge basin; however, the views of substantial vegetation would not be considered significant or detrimental.

The visual characteristics of the site will be altered during construction activities due to site grading for the trail, as well as the introduction of construction equipment. Construction is anticipated to occur over a 4- to 6-month period and would not be considered a substantial alteration of existing visual characteristics. Impacts would be less than significant.

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

Less than significant impact. According to the California Department of Transportation's California Scenic Highway Mapping System, the nearest designated scenic highway is a segment of State Route 91 starting at the interchange with the SR-55, approximately 300 feet north of the northern portion of the Project site. The City's Zoning Code provides for a Scenic Corridor Overlay (SC) Zone in order to promote orderly growth in this scenic area of Anaheim Hills. The SC Overlay Zone is defined as the area lying easterly of the intersection of SR-55 and SR-91, westerly of the Riverside County line, southerly of the Atchison, Topeka and Santa Fe Railroad right-of-way, and northerly of the present or any future south city limits of the City of Anaheim. The Project site is not part of the SC Zone and is located 1.6 miles west of the SC Zone.

Although the Project site is located in close proximately to a state scenic highway, the Proposed Project would not substantially damage scenic resources within the state scenic highway. No historic buildings or rock outcroppings are located at the Project site.

As described above, the urban nature park will be planted with native shade trees, locally native shrubs, native grasses, and vegetative bioswales consistent with the plantings in the mitigation areas on-site. The Project will remove eleven trees at southern end of the Project site near Lincoln Avenue.

This will include the removal of three Aleppo pine (*Pinus halepensis*), two lemon-scented gum (*Eucalyptus citriodora*), two silk oak (*Grevillea robusta*), and four Canary Island pine (*Pinus canariensis*), all to be replaced with native vegetation, including the planting of 200 native trees on the site.

As discussed above, the Project site is currently bare earth and the Project would include the addition of substantial vegetation, contributing to the visual improvement to the Project site. As a result, the implementation of the Project would have a less than significant impact to scenic resources within a state scenic highway.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

Less than significant impact. Implementation of the Proposed Project would not degrade the existing visual character or quality of the site and its surroundings because the majority of the proposed improvements would be at ground level. With the exception of the Five Coves Mitigation Area and ornamental trees at the southern end of the Project site, the site is barren.

As described above, the urban nature park will be planted with native shade trees, locally native shrubs, native grasses, and vegetative bioswales consistent with the plantings in the mitigation areas on-site. The Project will remove eleven trees at southern end of the Project site near Lincoln Avenue. This will include the removal of three Aleppo pine (*Pinus halepensis*), two lemon-scented gum (*Eucalyptus citriodora*), two silk oak (*Grevillea robusta*), and four Canary Island pine (*Pinus canariensis*), all to be replaced with native vegetation, including the planting of 200 native trees on the site. Native plantings will also be installed adjacent to the residential homes on the western side of the trail and throughout the park.

The trail will run in a north-south orientation, and plantings with native vegetation found in the Santa Ana River Bioregion will be installed, including native shrubs, groundcovers and grasses as appropriate to the site will line both sides of the trail. The native planting area bound by the eastern portion (basin side) of the trail will be separated from the trail by a split-rail fence. This planting area on the basin side of the trail will also be separated from the trail by a rock-lined, earthen stormwater swale, which will function to route and capture stormwater from the trail. Adjacent to the homes located on the west side of the trail (residential side) plantings with native vegetation found in the Santa Ana River Bioregion will be installed, including native shrubs, groundcovers and grasses as appropriate to the site. The species to be planted were selected according to homeowner preference. Homeowners were provided with a list of viable native species to select from in 2016. The planting area on the residential side of the trail will be 20 feet wide, where possible.

Various fences and gates are proposed on-site. The approximately 20-foot-wide planting area adjacent to the trail will be separated from homes by an existing 5-foot-tall block wall, which will not be removed or altered as part of the Project. In addition, the planting area will be bounded by the eastern portion of the trail will be separated from the trail by a split-rail fence. The proposed fences and gates would not substantially alter the visual character of the area. It is anticipated that the installation of native vegetation will enhance the visual quality of the site. The impact would be less than significant.

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

Less than significant impact. Currently, the Project site is not lighted at night, but light does spill onto the site from the adjacent homes, Lincoln Avenue, and development across the river. The project will not create a significant source of light or glare to the residents surrounding the Project site. The project will feature downward-facing solar-powered lighting for nighttime safety at the Project site entry points, once in the middle of the nature park where the trail has a curve for safety, and in the Lincoln Avenue tunnel (24/7). This lighting at the entry gates is at the request of the Anaheim Police Department, the Proposed Project will incorporate low-height security lighting (15 feet or less in height). The lighting in the tunnel will help to notify trail users that an OCWD maintenance vehicles is approaching the tunnel and prevent conflicts of users in the tunnel. Downward-facing safety lighting is designed as not to create a source of light that would block views of the nighttime sky. As the downward-facing safety lighting and the security lighting at the entry gates and exercise area will be low in height and approximately one foot-candle per fixture, no substantial light impact on the adjacent uses would occur.

Additional lighting will not be provided in order to comply with the requirements of the Five Coves Mitigation Area in order to protect native plants and animals in the mitigation area from excessive nighttime lighting. These provisions for lighting are described in Appendix A: *City of Anaheim Community Services Department Anaheim Coves Operation and Maintenance Plan*, December 14, 2016.

None of the Project features would introduce a source of glare to the site. No other lighting would be incorporated into the Proposed Project. Impacts would be less than significant.

Phase 1: Burris Basin build-out with vegetation regrowth.

Phase 2: Anaheim Coves project Area.

FirstCarbon SOLUTIONS

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Exhibit 7
Visual Comparison of Burris Basin and Anaheim Coves Project Sites

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3.2 - Agriculture

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.2 Agriculture and Forestry Resources *In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:*				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
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?	☐	☐	☐	☒

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. These resources were used to evaluate impacts to agriculture and forestry for the Proposed Project.

Environmental Evaluation

Would the project:

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

No impact. According to the California Department of Conservation's (CDC's) Orange County Important Farmland 2012 Map,[1] the Project site is designated as being Urban and Built-Up land. The project site is not designated as being Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (CDC 2015). Currently, the property is not under agricultural production. Implementation of the Project will include native landscaping and other park amenities. Therefore, the Project will not affect farmland. There would be no impact.

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

No impact. As stated above, According to the California Department of Conservation's (CDC's) Orange County Important Farmland 2012 Map, the Project site is designated as being Urban and Built-Up land. The City of Anaheim's General Plan designates the Project site as Open Space, and according to the Land Use Element, the Project site is classified as Vacant, Open Space. In addition, the CDC's Williamson Act Parcels Map does not include the Project site as being under a Williamson Act Contract. Therefore, the Proposed Project will not conflict with the site's existing zoning (DOC 2015). Areas surrounding the Project site include residentially zoned parcels or public facilities (flood control channel to the east). The project site's zoning and existing/future land uses do not conflict with "zoning for agricultural use" or "Williamson Act contracts" because neither agricultural uses nor Williamson Act contracts exist at the Project site. There would be no impact.

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

No impact. The project site General Plan Designation is Open Space and Open Space—Water, and the Project site zoning is Transition. The Project site consists predominately of disturbed lands that contain ruderal field vegetation composed of herbaceous, ruderal forb and non-native grass species. The vegetation is subject to frequent disturbances associated with fuel modification and weed abatement. Additionally, many portions of the of the study area have been utilized as staging areas for heavy equipment for maintenance activities at Five Coves Basin. Dominant plant species include

[1] http://www.conservation.ca.gov/dlrp/fmmp. Accessed November 25, 2016.

ruderal non-native weedy species with ornamental tree species. The project also contains the OCWD Five Coves Mitigation Area with native vegetation plantings that is not designated as forest land, timberland, or timberland zoned Timberland Production. The project would not disturb the mitigation area. Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. There would be no impact.

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

No impact. The project site is categorized by the CDC's Orange County Important Farmland 2012 Map as Urban and Built-Up land (CDC 2015). As described above, the Project site does not currently contain forest land. Thus, project implementation would not result in the loss of forest land or conversion of forest land to non-forest use. There would be no impact.

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

No impact. As stated above, According to the California Department of Conservation's (CDC's) Orange County Important Farmland 2012 Map, the Project site is designated as being Urban and Built-Up land. The City of Anaheim's General Plan designates the Project site as Open Space, and according to the Land Use Element, the Project site is classified as Vacant, Open Space. The immediately surrounding area to the Project site is residential and public facilities (flood control channel). There are no agricultural or forest uses in the vicinity of the Project site. Therefore, project implementation would not involve changes in the existing environment that could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. There would be no impact.

3.3 - Air Quality

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.3 Air Quality *Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:*				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
c) 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 (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. The South Coast Air Quality Management District (SCAQMD) requires projects meet certain Standard Conditions. They are requirements and, therefore, incorporated into the analysis. Standard Conditions relevant to the Project are provided in the section for reference.

The analysis in this section is supported by the Air Quality Modeling Data prepared by FirstCarbon Solutions, which is provided in Appendix B.1, *Air Quality and Greenhouse Gas Analysis Report*, FirstCarbon Solutions, June 16, 2016 of this Initial Study.

Environmental Evaluation

Would the project:

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

Less than significant impact. The project site is located in the City of Anaheim, which is located in the South Coast Air Basin (SCAB). The regional agency responsible for air quality within the Air Basin is the SCAQMD. The applicable air quality plan for the Project site is the 2012 Air Quality Management Plan for the South Coast Air Basin (SCAQMD 2012). The SCAQMD works directly with the Southern California Association of Governments (SCAG), county transportation commissions, and local governments, and it cooperates with state and federal agencies.

To determine if a project conflicts with or obstructs the implementation of the applicable air quality plan (2012 Air Quality Management Plan for SCAB), the SCAQMD's CEQA Air Quality Handbook states that there are two key indicators. These indicators are identified by the criteria discussed below.

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

   Project applicability: applicable and assessed below.

2. Indicator: According to Chapter 12 of the SCAQMD's CEQA Air Quality Handbook, the purpose of the General Plan consistency finding is to determine whether a project is inconsistent with the growth assumptions that are incorporated into the air quality plan, and thus whether it would interfere with the region's ability to comply with federal and State air quality standards.

   Project applicability: not applicable.

Considering the recommended criteria in the SCAQMD's 1993 Handbook, this analysis uses the following criteria to address this potential impact:

- Step 1: Project's contribution to air quality violations (SCAQMD's first indicator)
- Step 2: Assumptions in AQMP (SCAQMD's second indicator)
- Step 3: Compliance with applicable emission control measures in the AQMPs

Step 1: Project's Contribution to Air Quality Violations

According to the SCAQMD, the Project is consistent with the Air Quality Management Plan (AQMP) if the Project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP (SCAQMD AQMP 1993, page

12-3). As shown in Section 3.3 Impact b), the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Step 2: Assumptions in AQMP

According to Chapter 12 of the SCAQMD's CEQA Air Quality Handbook, the purpose of the General Plan consistency finding is to determine whether a project is inconsistent with the growth assumptions that are incorporated into the air quality plan and, thus, whether it would interfere with the region's ability to comply with federal and state air quality standards. The project consists of the construction and development of a 9-acre linear urban nature park that would include a Class 1 bike path paved with permeable asphalt, a decomposed granite multi-use trail, and a demonstration garden/children's education/nature play area. Therefore, the Project would not adversely affect growth assumptions within the AQMP. The project is less than significant for this criterion.

Step 3: Control Measures

The Proposed Project would also comply with all applicable rules and regulations of the AQMP. Because of the nature of the Proposed Project, which includes earth-moving activity, SCAQMD 403 applies (SCAQMD 2005). Rule 403 governs emissions of fugitive dust during construction and operation activities. The rule requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, SCAQMD Rule 403 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off-site. Compliance with this rule is achieved through application of standard Best Management Practices, such as application of water or chemical stabilizers to disturbed soils, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 miles per hour, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 miles per hour, and establishing a permanent ground cover on finished sites. The Proposed Project's compliance with SCAQMD Rule 403 would result in consistency with the applicable AQMP control measures. As such, emissions of fugitive dust during construction would be minimal.

Accordingly, the Proposed Project would not conflict with or obstruct implementation of the applicable air quality plans, and the impact would be less than significant.

Summary

Analysis Step 1: the Project would not contribute to air quality violations because its construction emissions do not exceed the SCAQMD regional significance threshold for construction emissions. Therefore, the Project is consistent with this criterion.

Analysis Step 2: According to Chapter 12 of the SCAQMD's CEQA Air Quality Handbook, the purpose of the General Plan consistency finding is to determine whether a project is inconsistent with the growth assumptions that are incorporated into the air quality plan, and thus whether it would interfere with the region's ability to comply with federal and state air quality standards. The project consists of the construction and development of a 9-acre linear urban nature park and therefore

would not adversely affect growth assumptions within the AQMP. The project is less than significant for this criterion.

Analysis Step 3: The project would comply with all applicable rules and regulations. Therefore, the Project is consistent with this criterion.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less than significant impact. This impact relates to localized criteria pollutant impacts. Particulate matter emissions (PM_{10}) are of concern during construction because of the potential to emit fugitive dust during earth-disturbing activities. In addition, SCAQMD has set localized significance thresholds (LSTs) for project construction and operation emissions. Impacts for nitrogen oxides (NO_x), CO PM_{10}, and $PM_{2.5}$ are compared against the applicable SCAQMD's LST.

Localized Significance Threshold

The SCAQMD Governing Board adopted a methodology for calculating localized air quality impacts through LSTs that represent the maximum emissions from a project that would not cause or contribute to an exceedance of the most stringent applicable state or federal ambient air quality standard. LSTs were developed in recognition of the fact that criteria pollutants such as CO, NO_x, PM_{10}—and $PM_{2.5}$ in particular—can have local impacts at nearby sensitive receptors in addition to regional impacts. The LSTs are developed for each source receptor area and are applicable to NO_x, CO, PM_{10}, and $PM_{2.5}$.

The SCAQMD has divided the Air Basin into 36 Source Receptor Areas. These Source Receptor Areas are designated to provide a general representation of the local meteorological, terrain, and air quality conditions within the particular geographical area. To facilitate the localized assessment process, the SCAQMD provides a series of look-up tables that contain LSTs each Source Receptor Area within the Air Basin. The localized assessment methodology limits the emissions in the analysis to those generated from on-site activities. If on-site construction emissions exceed the LSTs, then the Project would be considered to have a significant air quality impact. The project is located within Source Receptor Area 17. The nearest sensitive receptors along the Project site would be located approximately 20 meters from the edge of the Project site.

The SCAQMD has published a "Fact Sheet for Applying CalEEMod to Localized Significance Thresholds" (SCAQMD 2011a). The California Emissions Estimator Model (CalEEMod) calculates construction emissions based on the number of equipment hours and the maximum daily disturbance activity possible for each piece of equipment. In order to compare CalEEMod reported emissions against the localized significance threshold lookup tables, the CEQA document should contain in its project design features or its mitigation measures the following parameters:

1) The off-road equipment list (including type of equipment, horsepower, and hours of operation) assumed for the day of construction activity with maximum emissions.

2) The maximum number of acres disturbed on the peak day.

3) Any emission control devices added onto off-road equipment.

4) Specific dust suppression techniques used on the day of construction activity with maximum emissions.

The duration for construction is shown in in Table 2: Construction Schedule. The construction equipment list for the grading phase is shown in Table 3: Construction Equipment Assumptions. The emissions generated by construction equipment are based on the horsepower and load factors of the equipment. In general, the horsepower is the power of an engine—the greater the horsepower, the greater the power. The load factor is the average power of a given piece of equipment while in operation compared with its maximum rated horsepower. A load factor of 1.0 indicates that a piece of equipment continually operates at its maximum operating capacity. The maximum number of acres disturbed per day is shown in Table 4: Maximum Number of Acres Disturbed per Day.

Table 2: Construction Schedule

Phase Name	CalEEMod Phase Type	Phase Start Date	Phase End Date	Total Number of Days
Grading	Grading	9/15/2017	10/16/2017	22
Trail Preparation and Paving	Paving	10/17/2017	1/13/2018	65
Landscaping	Site Preparation	1/13/2018	3/15/2018	44

Table 3: Construction Equipment Assumptions

Phase Name	Equipment	Number	Hours per day	Horse-power	Load Factor
Grading	Excavators	1	8.00	162	0.38
	Off-Highway Trucks	2	8.00	189	0.38
	Rubber Tired Dozers	1	8.00	255	0.40
	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Landscaping	Pressure Washers	1	3.00	13	0.30
Trail Preparation and Paving	Cement and Mortar Mixers	1	6.00	9	0.56
	Dumpers/Tenders	4	8.00	16	0.38
	Off-Highway Trucks	3	8.00	189	0.38
	Pavers	1	8.00	125	0.42
	Paving Equipment	1	6.00	130	0.36
	Rollers	1	6.00	80	0.38
	Tractors/Loaders/Backhoes	1	8.00	97	0.37

Note:
Construction equipment list identified by the client.
Source: FirstCarbon Solutions 2016.

Table 4: Maximum Number of Acres Disturbed per Day

Activity	Equipment	Number	Acres/8 hr day	Total Acres
Grading	Crawler Tractors	3	0.5	1.5
	Graders	0	0.5	0
	Rubber Tired Dozers	1	0.5	0.5
	Scrapers	0	1	0
Maximum Number of Acres Disturbed per Day				2
Source: South Coast AQMD, Fact Sheet for Applying CalEEMod to Localized Significance Thresholds, 2011a.				

As shown in Table 4: Maximum Number of Acres Disturbed per Day, the maximum number of acres disturbed in a day would be 2 acres.

The localized assessment methodology limits the emissions that are analyzed to those generated from on-site activities. On-site emissions from construction activities are compared with the LSTs for a 2-acre site in SRA 17 at 25 meters. On-site emissions are from fugitive dust during grading and off-road diesel emissions. As shown in Table 5: Construction Localized Significance Analysis, unmitigated emissions during construction do not exceed the LSTs.

Table 5: Construction Localized Significance Analysis

Activity	On-site Emissions (pounds per day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Grading	40.29	25.77	4.57	3.27
Trail Preparation and Paving (2016)	33.27	16.85	1.66	1.53
Trail Preparation and Paving (2017)	30.41	16.52	1.51	1.39
Landscaping	0.13	0.09	0.01	0.01
Maximum Daily On-Site Emissions	**40.29**	**25.77**	**4.57**	**3.27**
Localized Significance Threshold	115	715	6	4
Exceed Threshold?	No	No	No	No

Notes:
NO_x = oxides of nitrogen PM_{10} = particles less than or equal to 10 micrometers in diameter
$PM_{2.5}$ = particles less than or equal to 2.5 micrometers in diameter CO = carbon monoxide
Phases are assumed to not overlap; therefore, the maximum daily emissions are from the highest representative phase.
Source of emissions: FCS 2016—Winter Construction Results.
Source of thresholds: South Coast Air Quality Management District 2009, for SRA 17, 25 meters, 2-acre site.

The localized construction analysis uses thresholds that represent the maximum project emissions that would not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard (SCAQMD 2008). If the Project results in emissions that do not exceed the LSTs, it follows that those emissions would not cause or contribute to a local exceedance of the appropriate ambient air quality standard. The localized construction analysis demonstrates that the Project would not exceed the LSTs for CO, NO_2, PM_{10}, or $PM_{2.5}$. Therefore, the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation during construction.

Operations

The localized assessment methodology limits the emissions that are analyzed to those generated from on-site activities. On-site emissions from operation activities are compared with the LSTs for a 1-acre site in SRA 17 at 25 meters and are shown in Table 6: Operational Localized Significance Analysis. On-site emissions do not include emissions from mobile sources.

Table 6: Operational Localized Significance Analysis

Activity	On-site Emissions (pounds per day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Maximum On-site Winter Total Project Emissions	<0.01	<0.01	0	0
Maximum On-site Summer Total Project Emissions	<0.01	<0.01	0	0
Maximum On-site Daily Emissions	<0.01	<0.01	0	0
Localized Significance Threshold	81	485	1	3
Exceed Threshold?	No	No	No	No

Notes:
NO_x = nitrogen oxides CO = carbon monoxide PM_{10} and $PM_{2.5}$ = particulate matter
Source of emissions: Appendix B.2*, Combined CalEEMod Output, Winter Construction Results*, FirstCarbon Solutions, March 29, 2016.
Source of thresholds: South Coast Air Quality Management District 2009, for SRA 17, 25 meters, 1-acre site.

The localized operation analysis uses thresholds that represent the maximum project emissions that would not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard (SCAQMD 2008). If the Project results in emissions that do not exceed the LSTs, it follows that those emissions would not cause or contribute to a local exceedance of the appropriate ambient air quality standard. The localized project operation analysis demonstrates that the Project would not exceed the LSTs for CO, NO_2, PM_{10}, or $PM_{2.5}$. Therefore, the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation during construction.

Carbon Monoxide Hot Spot Analysis

CO hot spots may occur in areas with severe traffic congestions and high volumes of traffic. The project will result in a negligible increase in traffic; therefore, it is reasonable to conclude that the Project would not contribute to a CO hot spot. No further analysis is required.

Standard Conditions

SC-4.3-1 All construction contractors shall comply with South Coast Air Quality Management District (SCAQMD) regulations, including Rule 403, Fugitive Dust. All grading (regardless of acreage) shall apply best available control measures for fugitive dust in accordance with Rule 403. To ensure that the Project is in full compliance with applicable SCAQMD dust regulations and that there is no nuisance impact off the site, the contractor would implement each of the following:

- Moisten soil not more than 15 minutes prior to moving soil or conduct whatever watering is necessary to prevent visible dust emissions from exceeding 100 feet in any direction.
- Apply chemical stabilizers to disturbed surface areas (completed grading areas) within five days of completing grading or apply dust suppressants or vegetation sufficient to maintain a stabilized surface.
- Water excavated soil piles hourly or covered with temporary coverings.
- Water exposed surfaces at least twice a day under calm conditions. Water as often as needed on windy days when winds are less than 25 miles per day or during very dry weather in order to maintain a surface crust and prevent the release of visible emissions from the construction site.
- Wash mud-covered tired and under-carriages of trucks leaving construction sites.
- Provide for street sweeping, as needed, on adjacent roadways to remove dirt dropped by construction vehicles or mud, which would otherwise be carried off by trucks departing project sites.
- Securely cover loads with a tight fitting tarp on any truck leaving the construction sites to dispose of debris.
- Cease grading during period when winds exceed 25 miles per hour.

c) 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 (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?

Less than significant impact. This impact is related to regional criteria pollutant impacts. The non-attainment regional pollutants of concern are ozone, PM_{10}, and $PM_{2.5}$. Ozone is not emitted directly into the air but is a regional pollutant formed by a photochemical reaction in the atmosphere. Ozone precursors, volatile organic compounds (VOC) and NO_x, react in the atmosphere in the presence of sunlight to form ozone. Therefore, the SCAQMD ozone threshold is based the emissions of the ozone precursors VOC and NO_x. This impact section includes analysis of, and significance determinations for, those pollutants.

If an area is in nonattainment for a criteria pollutant, then the background concentration of that pollutant has historically exceeded the ambient air quality standard. It follows that if a project exceeds the regional threshold for that nonattainment pollutant, then it would result in a cumulatively considerable net increase of that pollutant and result in a significant cumulative impact.

The Project site is in nonattainment for PM_{10}, $PM_{2.5}$, and ozone. Therefore, if the Project exceeds the regional thresholds for PM_{10} or $PM_{2.5}$, then it contributes to a cumulatively considerable impact for those pollutants. If the Project exceeds the regional threshold for NO_x or VOC, then it follows that the Project would contribute to a cumulatively considerable impact for ozone. If the Project exceeds the NO_x threshold, it could contribute cumulatively to NO_2 concentrations.

Regional emissions include those generated from all on-site and off-site activities. Regional significance thresholds have been established by the SCAQMD, because emissions from projects in the area can potentially contribute to the existing emission burden and possibly affect the attainment and maintenance of ambient air quality standards. SCAQMD's significance thresholds for project construction and operation are provided within the respective analyses below.

Construction and operational emissions were modeled using CalEEMod version 2013.2.2, modeling output can be seen within Appendix B.1, *Air Quality and Greenhouse Gas Analysis Report*, FirstCarbon Solutions, June 16, 2016.

Construction Emissions

The construction activities associated with the Project include grading, paving, and landscaping. The project would be constructed over approximately six months, with all construction with heavy equipment occurring in the first four months. The remaining two months would include such landscaping activities as planning and irrigation. Construction is expected to begin September 15, 2017. Table 7: Construction Air Pollutant Emissions by Activity summarizes construction-generated emissions. For the assumptions used in generating the emissions, please refer to Appendix B.1, *Air Quality and Greenhouse Gas Analysis Report*, FirstCarbon Solutions, June 16, 2016. The project would be required to adhere to standard SCAQMD regulations, such as implementing SCAQMD Rule 403, which would reduce fugitive dust emissions. The above regulation is represented in CalEEMod as mitigation; however, they are not considered mitigation for CEQA, as they are required by regulation.

Table 7: Construction Air Pollutant Emissions by Activity

Activity	Emissions (pounds per day)					
	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Grading	4.07	43.62	29.31	0.05	5.02	3.42
Trail Preparation and Paving (2016)	3.41	33.42	18.40	0.04	1.99	1.62
Trail Preparation and Paving (2017)	3.19	30.54	17.93	0.04	1.84	1.48
Landscaping	0.03	0.14	0.23	0.00	0.04	0.02
Maximum Daily Emissions	4.07	43.62	29.31	0.05	5.02	3.42
Significance Threshold	75	100	550	150	150	55

Table 7 (cont.): Construction Air Pollutant Emissions by Activity

Activity	Emissions (pounds per day)					
	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Significant Impact?	No	No	No	No	No	No

Notes:
NO_x = oxides of nitrogen PM_{10} = particles less than or equal to 10 micrometers in diameter
$PM_{2.5}$ = particles less than or equal to 2.5 micrometers in diameter CO = carbon monoxide
Each of the above activities does not occur at the same time; therefore, the maximum daily emissions represent the maximum emissions that would occur in one day.
Source of emissions: FCS 2016—Winter Construction Results.
Source of thresholds: South Coast Air Quality Management District 2009

The information shown in Table 7: Construction Air Pollutant Emissions by Activity indicates that the SCAQMD regional emission thresholds would not be exceeded for construction emissions. Therefore, construction emissions are considered to have a less than significant regional impact.

Operational Regional Emissions

CalEEMod was used to estimate operational emissions that would occur with the proposed land uses. Emissions would be from motor sources and area sources (landscape and consumer products). Motor sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Area and motor sources would be generated due to maintenance and visitors associated with the Project.

The emissions analysis utilized the trip generation rate of 20 daily vehicle trips per acre from the information provided in Appendix H: *The Coves Northern Extension Trip Generation Assessment*, Urban Crossroads, February 23, 2016.

Operational emissions were estimated for the summer and winter seasons and are shown in Table 8: Operational Regional Pollutants (Winter Season) and Table 9: Operational Regional Pollutants (Summer Season).

Table 8: Operational Regional Pollutants (Winter Season)

Source	Emissions (pounds per day)					
	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Area	12.99	<0.01	<0.01	0	0	0
Energy	0	0	0	0	0	0
Mobile	0.71	1.58	7.23	0.02	1.41	0.39
Total Project Operation	13.69	1.58	7.24	0.02	1.41	0.39
SCAQMD Significance Threshold	55	55	550	150	150	55
Significant Impact?	No	No	No	No	No	No

Notes:
VOC = volatile organic compounds NO_x = oxides of nitrogen CO = carbon monoxide
SO_x = sulfur oxides PM_{10} = particles less than or equal to 10 micrometers in diameter
Source of emissions: Appendix B.2*, Combined CalEEMod Output, Winter Construction Results*, FirstCarbon Solutions, March 29, 2016.
Source of thresholds: South Coast Air Quality Management District 2011a.

Table 9: Operational Regional Pollutants (Summer Season)

Source	Emissions (pounds per day)					
	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Area	12.99	<0.01	<0.01	0	0	0
Energy	0	0	0	0	0	0
Mobile	0.67	1.50	7.25	0.02	1.41	0.39
Total Project Operation	13.65	1.50	7.25	0.02	1.41	0.39
SCAQMD Significance Threshold	55	55	550	150	150	55
Significant Impact?	No	No	No	No	No	No

Notes:
VOC = volatile organic compounds NO_x = oxides of nitrogen CO = carbon monoxide
SO_x = sulfur oxides PM_{10} = particles less than or equal to 10 micrometers in diameter
Source of emissions: Appendix B.2*, Combined CalEEMod Output, Winter Construction Results*, FirstCarbon Solutions, March 29, 2016.
Source of thresholds: South Coast Air Quality Management District 2011a.

The information shown in Table 8: Operational Regional Pollutants (Winter Season) and Table 9: Operational Regional Pollutants (Summer Season) indicates that the SCAQMD regional emission thresholds would not be exceeded for operational emissions. Therefore, the long-term operational emissions are considered to have a less than significant regional impact.

Conclusion

The SCAQMD does not recommend quantified analysis of cumulative construction or operational emissions, nor does it provide separate methodologies or thresholds of significance to be used to assess cumulative construction or operational impacts. However, if an individual development project generates operational emissions that exceed the SCAQMD recommended daily thresholds, project-specific impacts would also cause a cumulative considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment.

As indicated in Table 7: Construction Air Pollutant Emissions by Activity through Table 9: Operational Regional Pollutants (Summer Season) above, the Project would not exceed SCAQMD thresholds during construction or operation. Therefore, the Project's impacts would be considered less than significant.

d) Expose sensitive receptors to substantial pollutant concentrations?

Less than significant impact. Those who are sensitive to air pollution include children, the elderly, and persons with pre-existing respiratory or cardiovascular illness. For purposes of CEQA, the SCAQMD considers a sensitive receptor to be a location where a sensitive individual could remain for 24 hours, such as residences, hospitals, or convalescent facilities (SCAQMD 2008a). Commercial and industrial facilities are not included in the definition because employees do not typically remain on-

site for 24 hours. However, when assessing the impact of pollutants with 1-hour or 8-hour standards (such as NO_2 and CO), commercial and/or industrial facilities would be considered sensitive receptors for those purposes.

The closest sensitive receptors are the residential land uses that border the Project site, with the closest dwelling units being approximately 66 feet from project site.

Construction: Localized Construction Impacts

As described in Section 3.3 impact b) above, the Project would not exceed the LSTs for construction-generated criteria pollutants. Therefore, the Project would not expose receptors to substantial criteria pollutant concentrations from construction activities. Impacts would be less than significant.

Construction: Diesel Particulate Matter

The project would generate diesel exhaust, a source of diesel particulate matter, during project construction. Diesel particulates are typically 2.5 microns ($PM_{2.5}$). On-site emissions of both diesel particulate matter occur during construction from the operation of heavy-duty construction equipment and from vendor trucks that operate on project site.

Project activities that would generate diesel particulate matter emissions are short-term in nature. Moreover, the current methodological protocols required by SCAQMD and ARB when studying the health risk posed by diesel particulate matter assume the following: (1) 24-hour constant exposure; (2) 350 days a year; (3) for a continuous period lasting 70 years. Therefore, considering the dispersion of the emissions and the short time frame, exposure to diesel particulate matter is anticipated to be less than significant.

Construction: Toxic Air Pollutants—On-site Workers

There are a variety of state and national programs that protect workers from safety hazards, including high air pollutant concentrations (California OSHA and CDC 2012).

On-site workers are not required to be addressed through this health risk assessment process. A document published by the California Air Pollution Control Officers Association (CAPCOA 2009), Health Risk Assessments for Proposed Land Use Projects, indicates that on-site receptors are included in risk assessments if they are persons not employed by the Project. Persons not employed by the Project would not remain on-site for any significant period. Therefore, a health risk assessment for on-site workers is not required or recommended. Impacts would be less than significant.

Operation: Toxic Air Pollutants

The ARB Air Quality and Land Use Handbook contains recommendations that will "help keep California's children and other vulnerable populations out of harm's way with respect to nearby sources of air pollution" (ARB 2005), including recommendations for distances between sensitive receptors and certain land uses. The project is not considered a sensitive receptor land use, but it is located approximately 20 meters from sensitive receptors.

The ARB's recommendations are specific to land uses known to be of concern for generation of TACs, and include heavily traveled roads, distribution centers, rail yards, ports, refineries, chrome plating facilities, fueling stations, and dry cleaners. The project would not involve any of the land uses identified by the Land Use Handbook.

The project proposes a 9-acre linear urban park. The linear urban park would accommodate existing surrounding residences and is not expected to generate a substantial number of new operational trips to or from the Project site or involve an operational activity that would be a source of substantial TACs. Therefore, the Project would not result in an operational TACs impact; operational impacts would be less than significant.

Operation: CO Hotspot

As described in Section 3.3 impact b) above, the Project would not create a localized CO hotspot. Therefore, the Project would not expose receptors to substantial CO concentrations from operational activities.

Conclusion

The project would not expose receptors to substantial construction-generated localized criteria pollutant concentrations, construction-generated diesel particulate matter, operational toxic air contaminants, or CO hotspots. Therefore, the Project would result in a less than significant impact.

e) Create objectionable odors affecting a substantial number of people?

Less than significant impact. Odors can cause a variety of responses. The impact of an odor results from interacting factors such as frequency (how often), intensity (strength), duration (in time), offensiveness (unpleasantness), location, and sensory perception.

Odor is typically a warning system that prevents animals and humans from consuming spoiled food or toxic materials. Odor-related symptoms reported in a number of studies include nervousness, headache, sleeplessness, fatigue, dizziness, nausea, loss of appetite, stomach ache, sinus congestion, eye irritation, nose irritation, runny nose, sore throat, cough, and asthma exacerbation (SCAQMD 2007).

The SCAQMD's role is to protect the public's health from air pollution by overseeing and enforcing regulations (SCAQMD 2007). The SCAQMD's resolution activity for odor compliance is mandated under California Health & Safety Code Section 41700, and falls under SCAQMD Rule 402. This rule on Public Nuisance Regulation states: "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals."

Project Analysis

During construction, the various diesel-powered vehicles and equipment in use on-site would create localized odors. These odors would be temporary and would not likely be noticeable for extended periods of time beyond the Project's site boundaries. The potential for diesel odor impacts is therefore less than significant. Land uses typically considered associated with odors include wastewater treatment facilities, waste-disposal facilities, or agricultural operations. Additionally, these types of land uses are not located in the Project's vicinity. The project does not contain land uses typically associated with emitting objectionable odors. During operation of the Project, odors would primarily consist of vehicles traveling to the urban linear park and additionally from the use of equipment during landscaping and facility maintenance. These occurrences would not produce a significant amount of odors; therefore, operational impacts would be less than significant.

3.4 - Biological Resources

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.4 Biological Resources *Would the project:*				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (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 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?	☐	☒	☐	☐

The following analysis discusses of relevant biological resource regulations and programs, existing biological conditions and potential impacts to biological resources associated with implementation of the Anaheim Coves Northern Extension Project. This analysis of impacts to biological resources was prepared by the OCWD Natural Resource Department in October of 2016. A biological resource reconnaissance field survey and assessment was conducted for the Proposed Project by FirstCarbon

Solutions in November of 2015 and is provided in Appendix C, *Biological Resources Assessment for the Anaheim Five Coves (Northern Extension) Project, Located in the City of Anaheim, Orange County, California,* FirstCarbon Solutions, November 29 2016. A literature review and a reconnaissance-level field survey were performed in support of the technical report.

Existing Conditions

The project site is subject to frequent disturbances associated with the removal of dry plant material for fire safety, weed abatement, and electrical line clearance. These disturbances include mowing and herbicide application for vegetation management.

The Project site is situated within an urbanized area and is surrounded by residential uses and groundwater management facilities and flood control facilities operated and maintained by the OCWD and OCFCD. On the east, the Project site runs parallel to OCWD groundwater recharge ponds, and then east of the ponds is the Santa Ana River. The groundwater recharge ponds immediately adjacent to the Project site are the Five Coves groundwater recharge basins. To the west of the site are single-family residential homes. North of the project site is the 91 Freeway and the Anaheim Canyon Business District.

The groundwater management and flood control facilities adjacent to the site are actively maintained for their proposed uses, yet provide open space and open water habitat value for the area. In the vicinity of the Project site are the following groundwater management and flood control facilities : Five Coves Basin, Lincoln Basin, Burris Basin, Santa Ana River and the Carbon Canyon Diversion Channel (Exhibit 4: Site Plan).

Five Coves Basin

Five Coves Basin is located adjacent to the Santa Ana River and is surrounded by a combination of groundwater management facilities, flood control facilities, and residential land uses (Exhibit 4: Site Plan). Five Coves Basin is a component of OCWD's Burris Basin/Santiago System and is a recharge facility and a pass-through reservoir that conveys flows to Lincoln Basin and Burris Basin. Five Coves Basin is composed Lower Five Coves Basin and Upper Fives Coves Basin.

Lower Five Coves Basin is 15 acres in size and is located between Upper Five Coves Basin and Lincoln Basin. The Santa Ana River levee is located immediately west of the basin. The vegetation around the basin consists mostly of disturbed ground cover and fragmented amounts of non-native and native vegetation. Because of ongoing routine maintenance activities, the basin does not support a population of aquatic animal species and provides minimal habitat value.

Upper Five Coves Basin is 14 acres in size and is situated between the Carbon Canyon Diversion Channel and Lower Five Coves Basin. The Santa Ana River levee is located immediately west of the basin. Upper Five Coves Basin receives surface water flows from the Santa Ana River by way of an inflatable dam located in the Santa Ana River. Similar to Lower Five Coves Basin, the majority of the vegetation around the perimeter of the basin consists of disturbed ground cover and fragmented amounts of non-native and native vegetation. Because of ongoing routine maintenance activities,

the basin does not support aquatic animal species and provides minimal habitat value, with the exception of a .31-acre marsh restoration project in the northeastern corner of the basin. This marsh restoration project is called the Five Coves Basin Freshwater Marsh Restoration Project and was established in 2014 and is included in the OCWD Habitat Management Plan. The Five Coves Basin Freshwater Marsh Restoration Project provides nesting habitat for several species, including red wing black birds (*Agelaius phoeniceus*), Allen's hummingbird (*Selasphorus sasin*), and Anna's hummingbird (*Calypte ana*).

Burris Basin

Burris Basin is an approximately 100-acre groundwater management basin located approximately 0.80 miles north of the proposed Anaheim Coves Northern Extension Project. Burris Basin is an identified mitigation site in the OCWD Habitat Management Plan. The biological resources managed at Burris Basin include a 5.8-acre riparian corridor along the water edge, 0.32-acre freshwater marsh and 2.5-acre Sand Island for colonial nesting sea birds. The Sand Island at Burris Basin is known to support special status species such as the California least tern (*Sternula antillarum brownii*), Forester's terntern (*Sterna forsteri*), and Black Simmers (*Rynchops niger*). Additionally, leastleast Bell's vireo (*Vireo bellii pusillus*) and yellow warblers (*Dendroica brewsteri brewsteri*) have been reported to nest within riparian corridor in Burris Basin. Additionally, the basin maintains a population of exotic fish that provides a source of food for nesting shore birds.

Lincoln Basin

Lincoln Basin is an existing ground water basin approximately 8.0 acres in size. It is situated between Burris Basin and Five Coves Basin. The basin is used for groundwater management and as testing basin to measure groundwater infiltration. The basin experiences frequent maintenance activities and is void of vegetation and provides minimal habitat value.

Santa Ana River

The Santa Ana River is the primary source of water to recharge the Orange County Groundwater Basin. The reach of the Santa Ana River within the vicinity of the Project site has been improved with flood control improvements, including drop structures. The bottom of the river in this area consists entirely of sandy substrate. The banks of the river are improved with rip rap and there is minimal vegetation along the banks. Intermittent freshwater vegetation occurs along this area of the river during the spring and summer months.

The dominant biological resource along the Santa Ana River in this Project vicinity is open water habitat, which attracts a wide variety of shore bird species. The river provides a source of food as well as a travel path for birds to both coastal and inland areas. Most of the bird species are closely associated with riparian and open-water habitats and include waterfowl, herons, pelicans, stilts, finches, and wide variety of raptors. Within the river, OCWD creates and maintains a series of small sand berms. The sand berms help to slow down the flow of the river and provides habitat for a wide variety of shore birds during nesting season.

The segment of the Santa Ana River near the Project site lacks the essential habitat elements to support native fish species, such as the Santa Ana suckersucker (*Catostomus santaanae*), Arroyo chubchub (*Gila orcutti*) or Santa Ana speckled dacespeckled dace (*Rhinichthys osculus*). Common fish species occurring in the Santa Ana River would include carp (*Cyprinus carpio*), fathead minnow (*Pimaphales*), green sunfish (*Lepomis cyanellus*), largemouth bass (*Micropterus salmoides*), bluegill (*lepomis macrochirus*), threadfin shad (*Dorosoma petenense*), channel catfish(*Ictalurus ounctatus*), and tilapia (*Oreochromis* sp.)

Carbon Canyon Diversion Channel

The Carbon Canyon Diversion Channel is a flood control channel that extends from OCWD Miller Basin to the Santa Ana River. A 1.5-acre segment of the Carbon Canyon Diversion Channel represents the northeastern-most boundary of the Project site. This 1.5-acre segment of the channel with lined with rip rap rock sides and has soft rocky bottom. It is separated from the Project site by a chain link fence. The approximately 10,420 feet long Carbon Canyon Diversion Channel is highly disturbed and is devoid of vegetation. It provides minimal habitat value.

Vegetation Communities

Prior to being operated as a groundwater management basin, the Five Coves Basin area was a gravel quarry for sand and gravel mining. The majority the ground cover around the basin has been disturbed and modified from the sand and gravel operations and from OCWD's groundwater management activities.

The majority of the Project site has been utilized as staging areas for heavy equipment for maintenance activities at Five Coves Basin. Three vegetation communities/habitat types occur within the Project site. These include ornamental grove vegetation, ruderal field vegetation, and developed areas. Developed areas are not considered habitat for any plant or animal species as the areas are currently paved, covered in gravel, or are subject to vehicle traffic frequently enough to hinder any vegetative growth. Following is a discussion of each of the vegetation communities/habitat types.

Ornamental grove vegetation consists of mature, non-native, and native tree species with an understory of either non-native annual grasses and forbs, or landscaped, non-native shrubs. Ornamental grove habitats are generally limited in size and the initial landscaping activities on the trees within are typically abandoned over time, allowing for wildlife species to utilize the overstory vegetation as habitat. The ornamental grove habitat provides nesting and perching opportunities for common passarine and raptor species.

Ruderal field vegetation consists of herbaceous, ruderal forb, and non-native grass species. The ruderal field habitat is subject to frequent disturbances associated with fuel modification and weed abatement. These disturbances include mowing and herbicide application. Additionally, many portions of the habitat have been utilized as staging areas for heavy equipment during maintenance activities of the adjacent basin. The ruderal field habitat provides suitable habitat for wildlife species common in disturbed, open areas.

At the southern end of the Project site near Lincoln Avenue is a cluster of ornamental trees ranging in height from 6 to 25 feet. These trees include a combination of Aleppo pine (*Pinus halepensis*), lemon-scented gum (*Eucalyptus citriodora*), silk oak (*Grevillea robusta*), and Canary Island pine (*Pinus canariensis*). These ornamental trees provide nesting and perching opportunities for common passerine and raptor species.

Special-status Plant Species

To determine the potential for special status plant species present within the study area, a database search with the United States Fish and Wildlife information and Planning Database and the California Department Fish and Wildlife (CDFW) Natural Diversity Database was conducted for Orange USGS Quadrangle. Subsequent to the database search, OCWD conducted a survey of the study area to determine the potential for the plant species to occur. A listing of special status plant species with potential to occur within the study area is shown in Table 10: Potential Sensitive Plant Species Occurring in Study Area. The determination on the potential for the special status plant species to occur within the study area was based on the following criteria:

- **Present:** Species were observed within the study area within the last year.
- **High:** The study area supports suitable habitat and the species has been observed within the last year.
- **Moderate:** The study area supports suitable habitat and the species has not been observed within last two years.
- **Low:** The study area lacks suitable habitat for the species.

Table 10: Potential Sensitive Plant Species Occurring in Study Area

Species	Federal	State	CNPS	General Habitat	CNDDB/OCWD Recent Occurrence	Study Area Habitat	Potential for Occurrence Study Area
Chaparral sand verbena *(Abronia villosa* var. *aurita)*	NA	NA	1B.1	Coastal Bluff Scrub, Chaparral sandy soils	1935 Extirpated from Study Area	Lack of Suitable Habitat	Low in Trail Alignment
Parish brittlescale *(Atriplex parishii)*	NA	NA	1B.1	Vernal pools, Alkali Meadows	1881 City of Buena Park Presumed Extant	Lack of Suitable Habitat	Low in Trail Alignment
Intermediate mariposa lily *(Calochortus weedii* var. *intermedius)*	NA	NA	1B.2	Coastal Scrub, Foothill Grassland	2003, 2 miles east SR-91, Peralta Hills	Lack of Suitable Habitat	Low in Trail Alignment
Southern tarplant *(Centromadia parryi* ssp. *Australis)*	NA	NA	1B.1	Marshes, Swamps, Vernal Pools	1933 City Westminster Presumed Extant	Lack of Suitable Habitat	Low in Trail Alignment
Many-stemmed dudleya *(Dudleya multicaulis)*	NA	NA	1B.2	Coastal Sage Scrub, Chaparral	1983, 1 mile south Santa Ana Canyon at Imperial Highway	Lack of Suitable Habitat	Low in Trail Alignment
Santa Ana River woollystar *(Eriastrum densifolium* ssp. *Sanctorum)*	E	E	1B.1	Sandy gravelly soils on river floodplain	1927 Possibly Extirpated from Study Area	Lack of Suitable Habitat	Low in Trail Alignment
Salt Spring Checkerbloom (*Sidalcea neomexicana*)	NL	NL	2B.2	Coastal Bluff Scrub	1952 Possibly Extirpated from Study Area	Lack of Suitable Habitat	Low in Trail Alignment
San Bernardino aster (*Symphyotrichum defoliatum)*	NL	NL	1B.2	Coast Scrub near ditches streams and springs	1896 Possibly Extirpated from Study Area	Lack of Suitable Habitat	Low in Trail Alignment

Table 10 (cont.): Potential Sensitive Plant Species Occurring in Study Area

Species	Federal	State	CNPS	General Habitat	CNDDB/OCWD Recent Occurrence	Study Area Habitat	Potential for Occurrence Study Area
Code Designations							
Federal/State E = Endangered T = Threatened				**California Native Plant Society CNPS** 1A = Plants presumed extinct in California 1B = Plants rare, threatened, or endangered in California and elsewhere 2 = Plants rare, threatened, or endangered in California but more common elsewhere 3 = Plants about which we need more review 4 = Plants of limited distribution **CNPS Threat Rank** .1 = Seriously Endangered .2 = Fairly Endangered .3 = Not Very Endangered			

While it is possible, based on the occurrences disclosed in this database search, for chaparral sand-verbena (*Abronia villosa* var. *aurita*) (occurrences within 1 mile of the Project site (Exhibit 8: CNDDB Recorded Occurrences of Special-Status Species (1 Mile)) to occur on the project site, it is unlikely because the habitat within the Project site is not suitable for chaparral sand-verbena. The project site contains disturbed habitat with little to no vegetation. Dominant plant species include ruderal non-native weedy species with a few ornamental tree species.

Sensitive vegetation occurs in the study area within the Five Coves Mitigation Site. The mitigation site consists of a mix of native riparian and native upland vegetation that includes Freemont cottonwood (*Populus fremontii*), Western sycamore (*Plantus racemosa*) Arroyo willow (*Salix lasiolepis*), toyon (*heteromeles arbutifolia*), lemonade berry (*Rhus integrifolia*), Coast live oak *(Quercus agrifolia),* coyote bush *(Baccharis pilularis)*, encelia (*Encelia californica)*, buckwheat *(Eriogonum fasciculatum)* and goldenbush *(Haplopappus venetus).* Any impacts to this mitigation area would be impacts to habitat considered sensitive by the California Department of Fish and Wildlife (CDFW) and United States Fish and Wildlife Service (USFWS).

Special-status Wildlife Species

To determine the potential for special status wildlife species present within the study area, a database search with the United States Fish and Wildlife information and Planning Database and the California Department Fish and Wildlife (CDFW) Natural Diversity Database was conducted. Subsequent to the database search, OCWD conducted a survey of the study area to determine the potential for the wildlife species to occur. A listing of special status plant species with potential to occur within the study area is shown in Table 11: Potential Sensitive Wildlife Species Occurring in Study Area. The determination on the potential for the special status wildlife species to occur within the study area was based on the following criteria:

- **Present**: Species was observed within the study area within the last year.
- **High:** The study area supports suitable habitat and the species has been observed within the last year.
- **Moderate**: The study area supports suitable and the species has not been observed within last two years.
- **Low**: The study area lacks suitable habitat for the species.

Table 11: Potential Sensitive Wildlife Species Occurring in Study Area

Species	Federal	State	General Habitat	CNDDB/OCWD Recent Occurrence	Study Area Habitat	Potential for Occurrence
Reptiles						
Coast horned lizard *(Phrynosoma coronatum)*	NL	SC	Low Lands along sandy washes, low brushes, open areas for sunning, abundant amount of ants	1971, Peralta Hills, SE of Yorba Linda	Lack of Suitable Habitat	Low in Trail Alignment
Orange-throat whiptail *(Aspidoscelis hyperythra)*	NL	SC	Low Level Coastal Sage Scrub, Chaparral, Grassland	2000, 2 miles NE of SR-91 & Imperial Highway	Lack of Suitable Habitat	Low in Trail Alignment
Birds						
Swainson's hawk *(Buteo swainsoni)*	NL	T	Grasslands with Scattered Trees	1885 Possible Extirpated from Study Area	Lack of Suitable Habitat	Low in Trail Alignment
Coastal cactus wren *(Campylorhynchus brunneicapillu sandiegensis)*	NL-	SC	Coastal Sage Scrub, closely associated areas containing patches of Cholla or prickly pear cacti.	2001, Anaheim Golf Course	Lack of Suitable Habitat	Low in Trail Alignment
Western yellow-billed cuckoo (*Coccyzus americanus occidentalis*)	NL	T	Riparian forest nester	1918, Extirpated from Study Area	Lack of Suitable Habitat	Low in Trail Alignment
Least Bell's vireo *(Vireo bellii pusillus)*	E	E	Low riparian Habitats, usually willow, mulefat or mesquite	2002, Peters Canyon Reservoir. Reported by OCWD 2015 Burris Basin	Lack of Suitable Habitat	Low in Trail Alignment
Coastal California gnatcatcher(*Polioptila californica*)	E	E	Coastal Sage Scrub	2011, Yorba Linda Reservoir Reported by OCWD Santiago Basin	Lack of Suitable Habitat	Low in Trail Alignment

Table 11 (cont.): Potential Sensitive Wildlife Species Occurring in Study Area

Species	Federal	State	General Habitat	CNDDB/OCWD Recent Occurrence	Study Area Habitat	Potential for Occurrence
Black skimmer (*Rynchops niger)*	NL	SC	Sandy Beaches	Reported by OCWD 2015 Burris Basin	Lack of Suitable Habitat	Low in Trail Alignment
Forester's terntern (*Sterna forsteri)*	NL	SC	Sandy Beaches	Reported by OCWD 2015 Burris Basin	Lack of Suitable Habitat	Low in Trail Alignment
American white pelican (*Pelecanus erythrorhynchos)*	NL	SC	Ocean and Lake Shores	Reported by OCWD 2015 Burris Basin	Lack of Suitable Habitat	Low in Trail Alignment
California leastleast tern (*Sternula antillarum brownii)*	E	E	Sandy Beaches	Reported by OCWD 2015 Burris Basin	Lack of Suitable Habitat	Low in Trail Alignment
Yellow warbler (Dendroica Brewsteri)	NL	SC	Riparian vegetation	Reported by OCWD 2015 Burris Basin	—	—
Mammals						
Mexican long-tongued bat *(Choeronyceteris mexicana)*	NL	SC	Well lite Caves, In and around Buildings	1995 City of Tustin	Lack of Suitable Habitat	Low in Trail Alignment
Western mastiff bat (*Eumops perotis californicus)*	NL	SC	Roosts in cracks, Small Holes and Man Made Structures	1990, City of Buena Park	Lack of Suitable Habitat	Low in Trail Alignment
Aquatics						
Santa Ana sucker (*Catostomus santaanae*)	T	SC	Cool, Clear Rocky Bottom Streams with Riparian Overhangs	2010, Near Green River Golf Course	Lack of Suitable Habitat	Low in Trail Alignment
Code Designations						
Federal/State E = Endangered T = Threatened SC = Species of Concern						

The Five Coves Mitigation Site is not currently considered suitable habitat for most wildlife species because the planted, native vegetation is young and the non-planted area contains sparse ruderal vegetation. Given the current restoration efforts in effect, this area is anticipated to be suitable scrub habitat in the coming years.

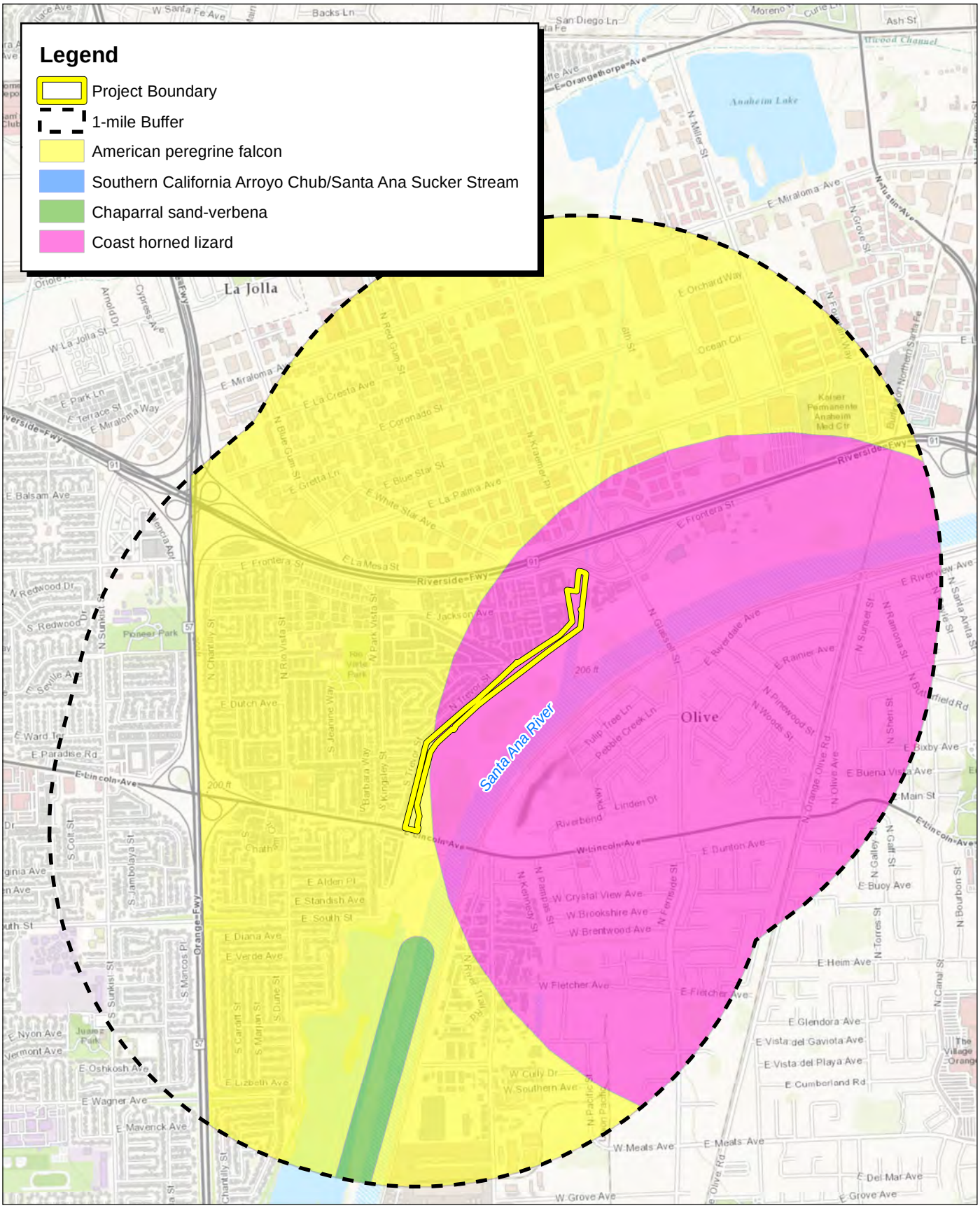
There are 15 special-status wildlife species within 5 miles of the Project site, and the unique characteristics of sandy sediment deposits and water storage within the nearby Burris Basin Habitat Management Area (BBHMA) located immediately south of the Project site has recently created suitable nesting habitat for several special-status shorebird species.

Three special-status wildlife species have a moderate to high potential to occur within the BBHMA, or were observed to be present on the site during the survey during the biological study for the Initial Study that was prepared for the Anaheim Coves Nature Park (Phase 1) (MBA 2009). The three special status wildlife species were determined to have a moderate to high potential to use portions of the BBHMA for foraging, roosting, dispersing, and/or basking, include great blue heron (*Ardea herodias*), American peregrine falcon (*Falco peregrinus*), and western mastiff bat (*Eumops perotis californicus*). Five additional special-status wildlife species have a high potential to occur or were observed as occurring within the adjacent Burris Basin habitat (MBA 2009). These five additional species determined to occur or have a moderate to high potential to occur in the adjacent Burris Basin include western snowy plover (*Charadrius alexandrinus nivosus*), American white pelican (*Pelecanus erythrorhynchos*), brown pelican (*Pelecanus occidentalis*), California least tern (*Sternula antillarum brownii*), and black skimmer (*Rynchops niger*).

While it is possible, based on the occurrences disclosed in this database search, for coast horned lizard (*Phrynosoma coronatum*) (occurrences within 1 mile of the Project site), as well as a recorded occurrence of the sensitive habitat Southern California Arroyo Chub/Santa Ana Sucker Stream within 1 mile of the site (Exhibit 8: CNDDB Recorded Occurrences of Special-Status Species (1 Mile)) to occur on the project site, it is unlikely. The habitat within the Project site does not provide suitable habitat for coast horned lizard. Southern California Arroyo Chub/Santa Ana Sucker Stream does not occur within the Project or its immediate vicinity.

Wildlife Movement Corridors

Typically, wildlife corridors and linkages that facilitate regional wildlife movement are generally centered near water ways, ridgelines, riparian corridors, and flood control channels that are contiguous to riparian habitat and upland habitat. Different types of wildlife movement corridors provide specific types of functions depending on the landscape of the area and habitat conditions. The common element among all wildlife movement corridors is connectivity to suitable habitat. The primary wildlife corridor within the study area is the Santa Ana River. The river functions as a wildlife corridor providing linkage to the Pacific Ocean as well as to other space areas and habitat along the river. It also functions as corridor for shore birds seeking inland habitat areas.



Source: CNDDB, April, 2016

Exhibit 8
CNDDB Recorded Occurrences of Special-Status Species (1 Mile)

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Environmental Evaluation

Would the project:

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

Less than significant impact with mitigation incorporated. As shown in Table 10: Potential Sensitive Plant Species Occurring in Study Area, the study area does not contain suitable habitat to support special status plant species. Additionally, there are no records in the United States Fish and Wildlife Information and Planning Database or the California Department Fish and Wildlife (CDFW) Natural Diversity Database indicating that special status plants species have ever been present in the study area. It would be very unlikely that special status plant species would be present within the study area where the construction activity would be occurring.

Presently the study area does not contain suitable habitat to support special status wildlife species. However, as shown in Table 11: Potential Sensitive Wildlife Species Occurring in Study Area, special Status bird species, such as California least tern, Forester's tern and black skimmer are known to nest on the Burris Basin Sand Island. The Burris Basin Sand Island is located approximately 0.80 mile from the Anaheim Coves Northern Extension Project study area. Special-status bird species such as the least Bell's vireo and the yellow warbler have been reported in the riparian vegetation at Burris Basin. The construction and maintenance activities associated with Anaheim Coves Northern Extension Project would not have any adverse impacts on any special-status wildlife species at Burris Basin. Additionally, because of the lack of suitable habitat and ongoing ground water recharge operations occurring Five Coves Basin it would very unlikely any of these species would nest within the Anaheim Coves Northern Extension Project site.

As the existing riparian vegetation in the Five Coves Mitigation Site matures, there would be an increased potential that special-status bird species could nest in the mitigation site. The nesting activity that would occur on the canopy of trees and would not be adversely impacted by intermittent trail users. The Anaheim Coves Northern Extension Project has been designed to avoid the mitigation area entirely. Any operations or maintenance activity set to occur in the Project site has been designed to specifically avoid the mitigation area (Appendix A, *City of Anaheim Community Services Department Anaheim Coves Operation and Maintenance Plan*, December 14, 2016). Any noise emitting maintenance equipment that could potentially disrupt the nesting patterns of nesting birds is to be avoided. To avoid potential adverse impacts to nesting birds, all construction and maintenance activities in the Project site (adjacent to the Five Coves Mitigation Site) would be required to occur outside of the nesting season. With the implementation of Mitigation Measures (MMs) BIO-1, BIO-2, and BIO-3, the potential adverse impacts to special status birds would be avoided.

Mitigation Measures

MM BIO-1 All construction adjacent to the Five Coves Mitigation Site will be conducted outside of the migratory bird season from March 15 to September 15.

To avoid any direct and/or indirect impacts to resident and/or migratory birds, project-related construction activities adjacent to the mitigation site should occur outside of the migratory bird season (March 15 to September 15).

MM BIO-2 For construction activities occurring outside and away from the Five Coves Mitigation Site within the nesting season, a qualified biologist will be contracted by the City of Anaheim to perform a pre-construction survey to determine the presence or absence of nesting birds and nesting raptors on or within 500 feet of the construction area. The pre-construction survey should be conducted no more than 10 calendar days prior to the commencement of construction. If no active nests are detected or project activities occur outside of the avian nesting season, no further action is necessary and construction activities may proceed without biological monitoring requirements. If an active nest is located during pre-construction surveys, the USFWS and/or California Department of Fish and Wildlife (CDFW) (as appropriate) shall be notified regarding the status of the nest. Construction activities shall be restricted as necessary to avoid disturbance of the nest until it is abandoned or the agencies deem disturbance potential to be minimal. Restrictions may include establishment of exclusion zones (no ingress of personnel or equipment at a minimum radius of 100 feet around an active raptor nest and a 50-foot radius around an active migratory bird nest) or alteration of the construction schedule. An OCWD biological monitor shall be present during construction activities to maintain the exclusion zones, and to minimize construction impacts and ensure that no nest is removed or disturbed until all young have fledged.

MM BIO-3 Ongoing during construction, the City shall stage construction equipment, store materials, and temporarily stockpile soil in previously disturbed areas at least 100 feet from the Five Coves Mitigation Site.

With the incorporation of Mitigation Measures BIO-1, BIO-2, and BIO-3, the Project would have a less than significant impact.

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

Less than significant impact with mitigation incorporated.

Construction Impacts

The native vegetation within the Five Coves Mitigation Site is considered a sensitive vegetation community and any permanent and temporary impacts that would result in the loss of the native vegetation would be considered a potential significant adverse impact. As shown in Exhibit 6: Typical Trail Cross Section above, the Anaheim Coves Northern Extension Trail would be situated between existing residential uses and the Fives Coves Mitigation Site, it would not interfere with or disturb

the mitigation site. The implementation of the Project would not result in any temporary or permanent impacts to the Five Coves Mitigation Site.

The vegetation types on-site are described in Exhibit 9: Vegetation Communities. The construction of the trail would require grading and the removal of eleven ornamental trees, located outside of the Five Coves Mitigation Site. The construction activities associated with the proposed trail improvements could indirectly result in the temporary degradation of vegetation within the mitigation site from generation of fugitive dust, increased vehicle traffic and increased anthropogenic activities in and near the mitigation site. As is required per Rule 403 to reduce impacts from fugitive dust, the construction contractor shall water unpaved areas as needed to control dust. To avoid potential indirect, construction-related impacts to the Five Coves Mitigation Site, Mitigation Measure BIO-4 and BIO-5, would be implemented.

Operational and Maintenance Impacts

The proposed trail alignment would extend along the Five Coves Mitigation Site. Periodically, the trail and the vegetation adjacent to the trail will require maintenance. To avoid impacts to the vegetation within the mitigation site, a two foot landscape setback with low growing native ground cover would be maintained along the trail and fencing would be provided to keep trail users on the trail, outside of the mitigation site.

The establishment of this low-growing ground cover along the mitigation area would prevent the potential for adverse impacts to wildlife that could be present while maintenance activities are occurring. With the implementation of Mitigation Measures BIO-5 and BIO-6, potential operation and maintenance impacts to the Five Coves Mitigation Site would be less than significant.

Mitigation Measures

MM BIO-4 Prior to construction, the City shall install a 2-foot-wide setback with fencing in locations where the trail is adjacent to the edge of the mitigation site on the final construction plans. The City shall plant and maintain low growing vegetation will be provided within the 2-foot-wide setback area.

MM BIO-5 Ongoing during Project construction and operations, OCWD biological staff shall monitor vegetation within the Five Coves Mitigation Site for signs of plant stress. Plants that are stressed or damaged will be replaced in-kind by the City of Anaheim.

MM BIO-6 Ongoing during project operation, all maintenance activities within and adjacent to the Five Coves Mitigation Site involving the use noise emitting equipment will occur outside of the migratory bird season from March 15 to September 15.

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Less than significant Impact.

Jurisdictional Waters

Waters of the United States

A water body is considered Waters of the U.S. if it is a traditional navigable water or a tributary to navigable water that has perennial or seasonal flow of water. The nearest Waters of the U.S. to the study area include Lincoln Basin, Upper and Lower Five Coves Basins, Carbon Canyon Diversion Channel, and the Santa Ana River.

Waters of the State of California

According to the State Water Code, Waters of the State are defined as any surface water, groundwater or wetlands within the boundary of the State. The nearest Waters of the State to the study area would include Lincoln Basin, Upper and Lower Five Coves Basin, Carbon Canyon Diversion Channel and the Santa Ana River.

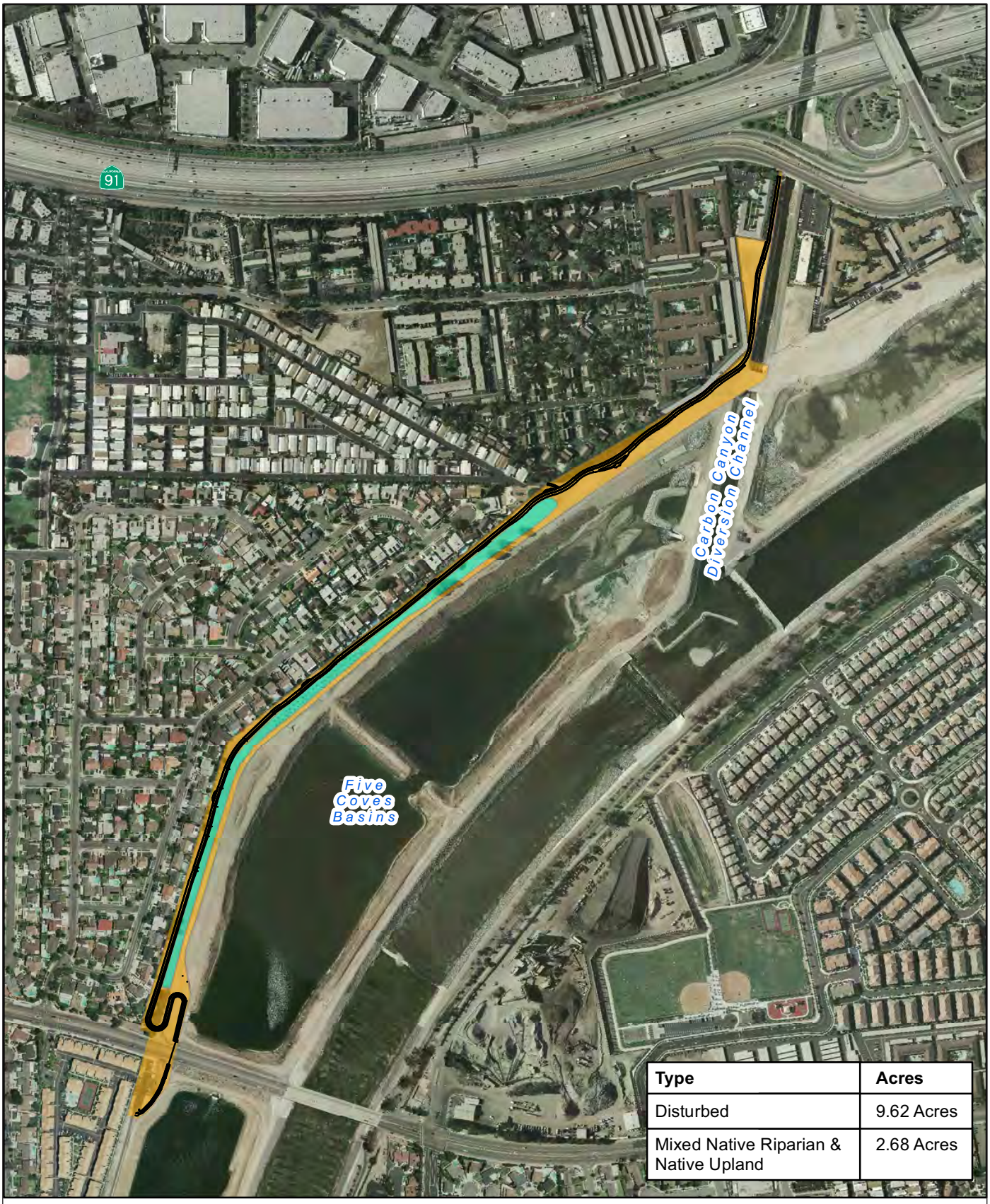
Wetland Waters of the United States and State California

Wetland Waters are a subset of jurisdictional Waters of the U.S. and the State. Generally, wetlands are lands where saturation with water is the dominant factor determining the nature of soil development and the types of plant and animal communities living in the soil and on its surface. Wetlands generally include swamps, freshwater marshes, brackish water and saltwater marshes, bogs, vernal pools, periodically inundated salt flats, intertidal mudflats, wet meadows, wet pastures, springs and seeps, portions of lakes, ponds, rivers and streams and all areas which are periodically or permanently covered by shallow water, or dominated by hydrophilic vegetation, or in which the soils are predominantly hydric in nature.

Presently, there is no single definition for wetlands. However, all resource agencies recognize that wetlands must demonstrate the following three essential elements: (1) the site periodically supports hydrophytic vegetation, (2) the site contains hydric soil and (3) the site periodically contains water or the soil is saturated with water at some time during the growing season of each year.

Wetland delineation was conducted in accordance with the USACE Wetland Delineation Manual to determine if wetland habitat was present in the location where the proposed trail improvements would occur. A three parameter approach was used to identify Wetland Waters of the U.S. and State. These three parameters include (1) the presence of wetland vegetation, (2) the presence of wetland hydrology and (3) the presence of hydric soils.

- **Vegetation:** The vegetation within the trail alignment is composed of non-native weeds and grasses that are not considered wetland plant indicator species. The study area would not meet the wetland vegetation parameter.



Type	Acres
Disturbed	9.62 Acres
Mixed Native Riparian & Native Upland	2.68 Acres

Proposed Trail | Disturbed | Mixed Native Riparian / Upland

Source: Orange County Water Distric

FirstCarbon® SOLUTIONS

0 500 1,000 Feet

Exhibit 9
Vegetation Communities

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- **Hydrology:** The only source of water for the Project site is seasonal rainfall and the existing irrigation system to the Five Coves Mitigation Site. The study area ground surface consists of compacted soils that would not saturate with rainfall. The study area would not meet the wetland hydrology parameter.
- **Hydric Soils:** The study area soils consist of compacted fill material and would not meet the hydric soil parameter.

The Project site lacks the required parameters that define Wetland Waters of the U.S. or State.

The Proposed Project includes various park improvements, as discussed in Section 1.2 of this MND. Grading activities will include site contouring for the new trail, the development of vegetated bio-swales, soil excavation, and soil export. A 20- to 30-foot-wide swath of native plantings will be installed between the trail and the adjacent homes and will be maintained with drip irrigation until established.

It should also be noted the Project will not disturb or impact the basin's shoreline, or waters (this area is currently fenced off and will continue to be fenced during construction and post-construction to prohibit human/water contact), nor would the Project impact OCWD's ability to access or maintain the groundwater replenishment program, or its mitigation area on-site. In addition, existing surface drainage at the Project site does not permit runoff to flow into the basin. Regardless, all on-site runoff will percolate through the permeable asphalt and the remaining water would travel to bio-swales, minimizing any sediment or pollutants from leaving the site. The Proposed Project will not change the existing drainage pattern of the site.

Waters of the United States

The nearest water bodies within the study area that are classified as Waters of the United States and Waters of the State are Lincoln Basin, Five Coves Basin and the Carbon Canyon Diversion Channel. The proposed trail improvements would occur in locations that are upland of Lincoln Basin, Fives Coves Basin, and the Carbon Canyon Diversion Channel and would not encroach into any jurisdictional areas that would require approval of a 404 permit from the USACE, Streambed Alteration Agreement from CDFW or 401 Water Certification from the Regional Water Quality Control Board.

Wetland Waters of the United States

The proposed trail improvements would occur in an upland location that does not contain the required parameters that define Wetland Waters of the United States and State. No adverse impacts to Wetland Waters of the U.S. or State would occur.

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

Less than significant impact with mitigation incorporated. The reach of the Santa Ana River near the study area lacks the essential habitat elements to support native fish species, such as the Santa Ana sucker, Arroyo chub or the Santa Ana speckled dace. There would be very low potential that any of the native fish species would be present in any of the study area water bodies.

The study area lacks suitable habitat to support wildlife and is not connected to any open spaces that contain suitable habitat that would encourage wildlife movement. The primary wildlife corridor within the study area is the Santa Ana River. The proposed trail improvements would be confined to the Project site and would not have any impact on wildlife movement that occurs along the Santa Ana River. Additionally, the construction activity would occur between 7 AM and 5 PM during the day, which would avoid potential disturbances to many species that typically move in the evening and early morning hours.

The urban nature park will be planted with native shade trees, locally native shrubs, native grasses, and vegetative bioswales consistent with the plantings in the mitigation areas on-site. The Project will remove eleven trees at southern end of the Project site near Lincoln Avenue on property owned by OCWD. The OCWD has granted permission to the City of Anaheim for the removal of the trees. This will include the removal of three Aleppo pine (*Pinus halepensis*), two lemon-scented gum (*Eucalyptus citriodora*), two silk oak (*Grevillea robusta*), and four Canary Island pine (*Pinus canariensis*), all to be replaced with native vegetation, including the planting of 200 native trees on the site. In nearby Burris Basin, there are ample numbers of trees of comparable height that would provide alternative nesting opportunities for migratory birds to compensate for the loss these ornamental trees. The removal of the ornamental trees would not substantially reduce nesting opportunities for migratory birds.

The Fives Coves Mitigation Site and the nearby Five Coves Freshwater Marsh both contain suitable nesting habitat for migratory birds. With the implementation of Mitigation Measures BIO-1, BIO-2, BIO-3, and BIO-6, the potential direct impacts and indirect construction and operational noise impacts to migratory birds would be avoided.

Mitigation Measures

Mitigation Measures BIO-1, BIO-2, BIO-3, and BIO-6 are required. With the incorporation of these mitigation measures, the Project would have a less than significant impact.

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

No impact: The proposed trail improvements would require the removal of eleven ornamental trees and non-native vegetation from the Project site. These trees are not identified in the Anaheim Municipal Code as specimen trees, which pertains to trees in the SC Overlay Zone. As previously

stated, the Project site is not located in the SC Overlay Zone. The trees and vegetation to be removed are located on property owned and managed by the OCWD (APN 268-081-04).

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?

Less than significant impact with mitigation incorporated. A portion of the study area is included within the OCWD Habitat Management Plan. The Five Coves Mitigation Area is one of seven mitigation sites that are included in the OCWD Habitat Management Plan to compensate for impacts to Waters of the U.S./State from routine maintenance activities occurring from OCWD's groundwater management facilities. The Five Coves Mitigation Site was planted in 2010 and 2014 and has been monitored in accordance with the monitoring procedures and growth performance standards established in the OCWD Habitat Management Plan. The annual reports submitted to CDFW, USACE, and RWQCB have shown that the vegetation within the Fives Coves Mitigation Site has achieved the required yearly growth performance standards.

The construction and operation proposed Five Coves Northern Extension Project would not result in temporary or permanent adverse impacts to the Five Coves Mitigation Site. Additionally, mitigation measures have been incorporated into the maintenance activities for the trail to avoid adverse impacts that would reduce biological values of the mitigation site. With the implementation of Mitigation Measures BIO-1 through BIO-6, potential conflicts with the OCWD Habitat Management Plan would be avoided.

Mitigation Measures

Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, and BIO-6 are required.

3.5 - Cultural Resources

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.5 Cultural Resources *Would the project:*				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological Resource pursuant to Public Resources Code Sections 21080.3.?	☐	☒	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

Environmental Evaluation

This section describes the existing cultural resources setting including historical and archaeological resources (resources determined eligible for listing in the California Register of Historic Resources (CR)) that could be affected by the Proposed Project. It presents the methods employed to identify historical resources, assesses impacts to those historical resources, and presents mitigation measures to address significant impacts. The following tasks were conducted to complete this section:

- Records Search and Literature Review
- Pedestrian Survey
- Phase I Cultural Resource Assessment (PI CRA)

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Less than significant impact with mitigation incorporated. In November 2016, FCS prepared a Phase I Cultural Resource Assessment (PIPI CRA) that meets the Secretary of the Interior's standards under CEQA (Appendix D.6, *Phase I Cultural Resources Assessment*, FirstCarbon Solutions, December 9, 2016). The PI CRA details the results of previous studies in 2014 and the results of a recent site survey that recorded a historic resource eligible for inclusion on the CRCR.

As presented in the PI CRA, there are 14 historic resources that have been recorded within a one-mile radius of the Project site. Three of these resources are prehistoric and are located approximately one mile beyond the Project site. The remaining 11 are historic-era resources. Two of these historic-era resources are located within the Project site.

The first Historic Property is the Carbon Canyon Diversion Canal and Dam (CCDCD, P-30-150048), which covers the majority of the Project site. The latter has been either mechanically built up or excavated; no natural soil deposits remain and no stratigraphy that would indicate the potential for buried cultural resources was observed in the interior banks of the basin. The improvements proposed will not require extensive excavation and will occur in areas that have been surficially disturbed.

The second resource recorded within the Project site is P-30-001733. This resource consists of a small but dense and diverse deposit of historic artifacts appearing to represent domestic trash from as early as the 1880s that was in use until the early 1940s. Aerial photographs show the historic scatter still in existence on the site in the early 1940s. The deposit was inadvertently discovered by the Southern California Gas Company while trenching in the middle of Lincoln Avenue in 2013. The deposit was thought to be entirely contained within and beneath Lincoln Avenue and was not eligible for inclusion on the CR because it had been almost completely destroyed during its discovery. On October 13, 2016 the Project site was visited by FCS archaeologist Michael Macko and historic artifacts from the same time period were scattered over a great distance to the north. Research has identified the location as a designated dump area per agreement between the County of Orange and the City of Anaheim. It appears these materials may relate to an extension of P-30-001733, so an updated Department of Parks and Recreation (DPR) recordation form was completed for the resource by Michael Macko. As with the original resource, the additional areas were found to be highly disturbed through grading and road construction, so the original assessment of CR ineligibility remains. Given the presence of these resources within the Project site, the potential for the Proposed Project to have an adverse effect on unknown historic resources should still be considered moderate to high.

Although both historic resources within the Project site have been found ineligible for the CR, subsurface construction activities have the potential to damage or destroy previously undiscovered historic resources. Historic resources can include wood, stone, foundations, and other structural remains; debris-filled wells or privies; and deposits of wood, glass, ceramics, and other refuse. Accordingly, implementation of Mitigation Measure CUL-1 will be required to reduce potential impacts to historic resources that may be discovered during project construction.

MM CUL-1 A known historic resource, P-30-001733, is located within the project area. While the resource has been found ineligible for the CR, its full extent remains unknown, and the potential for the discovery of undisturbed portions of the site, or additional resources, remains. An archaeologist who meets the Secretary of Interior's Professional Qualification Standards for archaeology shall be present during the initial phase of ground disturbance in order to check for the inadvertent exposure of cultural materials. This may be followed by regular periodic or "spot-check"

archaeological monitoring during ground disturbance as needed, but full-time archaeological monitoring is not required at this time. If a potentially significant cultural resource is encountered during subsurface earthwork activities, all construction activities within a 100-foot radius of the find shall cease and workers shall avoid altering the materials until the Archaeologist has evaluated the situation and provided appropriate recommendations. Project workers shall also not collect or remove any cultural resources. The City shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. Any previously undiscovered resources found during construction activities shall be recorded on appropriate Department of Parks and Recreation (DPR) forms and evaluated for significance in terms of CEQA criteria by a qualified archaeologist. If the resource is determined significant under CEQA, the qualified archaeologist shall prepare and implement a research design and archaeological data recovery plan that will capture those categories of data for which the site is significant in accordance with Section 15064.5 of the CEQA Guidelines. The archaeologist shall also perform appropriate technical analyses, prepare a comprehensive report complete with methods, results, and recommendations, and provide for the permanent curation of the recovered resources. The report shall be submitted to the City of Anaheim, the California Historic Resource Information System (CHRIS), and the State Historic Preservation Office (SHPO), if required.

With the incorporation of Mitigation Measure CUL-1, impacts associated with historic resources would be less than significant.

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

Less than significant impact with mitigation incorporated. The May 2014 records search concluded that no prehistoric cultural resources were identified within the project site. The records search identified three historic resources of prehistoric age within the record search radius, all of which are roughly one mile beyond the Project site. Although much of the Project site has been developed either through channelization of the Santa Ana River, agricultural development and especially during commercial and residential construction projects in the last seven decades, there is still a possibility of encountering archaeological deposits of all ages that have been buried by the floodwaters of the Santa Ana River. Overall, the potential for the Proposed Project to have an adverse effect on unknown archaeological resources should still be considered moderate to high.

Subsurface construction activities have the potential to damage or destroy previously undiscovered prehistoric resources. Prehistoric resources can include flaked-stone tools (e.g., projectile points, knives, and choppers) or obsidian, chert, or quartzite toolmaking debris; culturally darkened soil (such as midden soil containing heat-affected rock, ash, and charcoal, shellfish remains, and animal bones); and stone milling equipment (e.g., mortars, pestles, handstones). Accordingly, implementation of Mitigation Measure CUL-1 will be required to reduce potential impacts to

prehistoric resources that may be discovered during project construction. With the incorporation of mitigation, impacts associated with historic resources would be less than significant.

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

Less than significant impact with mitigation incorporated. Paleontological sensitivity within the Proposed Project site was evaluated through a paleontological literature review and an examination of the regional localities databases (contained in Appendix D.6, *Phase I Cultural Resources Assessment*, FirstCarbon Solutions, December 9, 2016) by the Natural History Museum of Los Angeles in June of 2014. According to this study, surficial sediments within the Project site and surrounding area consist of younger terrestrial Quaternary Alluvium, with older deposits from the Santa Ana River adjacent to the eastern boundary of the Anaheim Five Coves Trail. These deposits typically have low sensitivity for vertebrate fossils in the uppermost layers. A low potential indicates significant fossils are not likely to be found because of random fossil distribution pattern, the extreme youth of the rock unit, and/or method of rock formation such as alternation by heat and pressure. A fossil specimen of sheep (LACM1652) was recovered southwest of the Project site, along Rio Vista Avenue. The closest fossil locality recovered in older Quaternary sediments was a specimen of fossil horse (LACM4943) at a depth of 8 to 10 feet below the surface, east of the Project site along Fletcher Avenue east of Glassell Street.

Proposed grading activities occurring near the surface or very shallow excavations in the uppermost few feet of the younger Quaternary alluvial sediments on the Project site (anticipated to be 5 to 6 feet) are unlikely to uncover significant fossil vertebrate remains. However, deeper excavations (8 feet or above) occurring at the Project site could encounter significant vertebrate fossils. The excavations could potentially lead to the loss of valuable fossil resources, which would be considered a potentially significant impact. Paleontological resources may include but are not limited to fossils from mammoths, saber-toothed cats, rodents, reptiles, and birds. Accordingly, implementation of Mitigation Measure CUL-2 will be required to reduce potential impacts to paleontological resources that may be discovered during project construction.

MM CUL-2 Prior to the start of construction activities that involve subsurface excavation greater than 8 feet in depth, an Orange County Certified Paleontologist acceptable to the City shall be retained to produce a mitigation plan for the Project. The mitigation plan shall identify areas of the Project site where excavations would occur in excess of 8 feet where on-site monitoring would be required. In the event that fossils or fossil-bearing deposits are discovered during construction activities, excavations within a 100-foot radius of the find shall be temporarily halted or diverted. The City shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. The paleontologist shall document the discovery as needed in accordance with Society of Vertebrate Paleontology standards and assess the significance of the find under the criteria set forth in CEQA Guidelines Section 15064.5. The paleontologist shall notify the appropriate agencies to determine procedures to be followed before construction activities are allowed to resume at the location of the find. If the Applicant determines that avoidance is not

feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of construction activities on the discovery. The plan shall be submitted to the City of Anaheim for review and approval prior to implementation, and the Applicant shall adhere to the recommendations in the plan.

With the incorporation of mitigation, impacts associated with paleontological resources would be less than significant.

d) Disturb any human remains, including those interred outside of formal cemeteries?

Less than significant impact. No human remains or cemeteries are known to exist within or near the Project site. However, there is always the possibility that subsurface construction activities associated with the Proposed Project, such as trenching and grading, could potentially damage or destroy previously undiscovered human remains. In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5; Health and Safety Code Section 7050.5; Public Resources Code Section 5097.94 and Section 5097.98 must be followed. Accordingly, if human remains were encountered, this would be a potentially significant impact, and the implementation of City-required standard conditions would reduce this potential impact to a less than significant level.

3.6 - Geology and Soils

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.6. Geology and Soils *Would the project:*				
a) Expose people or structures to 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 risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

A Due Diligence Preliminary Geotechnical Review was prepared by Albus-Keefe and Associates, Inc. in 2015. The report summarizes the geotechnical constraints for the Project. This information is available in Appendix E, *Geotechnical Investigation and Infiltration Study for Proposed Anaheim Coves Northern Extension Project, City of Anaheim, California*, Albus-Keefe & Associates, Inc., December 23, 2015 of this report. In addition, an Initial Study was prepared for the Anaheim Coves Nature Park (Phase 1), the Project site for which is located immediately adjacent to the Proposed

Project site to the south, which included a geotechnical study (MBA 2009). Collectively, these documents provide information to support the following analysis.

Environmental Evaluation

Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:

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

No impact. Seismically induced ground rupture is defined as the physical displacement of surface deposits in response to an earthquake's seismic waves. Ground rupture is most likely along active faults, and typically occurs during earthquakes of magnitude five or higher. Ground rupture only affects the area immediately adjacent to a fault.

The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The Act requires the State Geologist to establish regulatory zones, known as "Alquist-Priolo (AP) Earthquake Fault Zones," around the surface traces of active faults and to issue appropriate maps. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (typically 50 feet).

The Project site is not located within the limits of the currently established Special Studies Zone as defined by the Alquist-Priolo Earthquake Fault Zoning Act (California Geological Survey 2015).

No active or potentially active faults (i.e., having ruptured during the last 11,000 years and 1.2 million years, respectively) are known to transect the site. However, the subject property is situated in earthquake prone Southern California. Proximally as well as regionally, there is evidence of geologically youthful fault movement. There would be no impact.

ii) Strong seismic ground shaking?

Less than significant impact. Southern California is a seismically active region. The site is situated in a seismically active area that has historically been affected by generally moderate to occasionally high levels of ground motion. The site lies relatively close to several active faults; therefore, during the life of the Proposed Project, the property will probably experience similar moderate to occasionally high ground shaking from these fault zones, as well as some background shaking from other seismically active areas of the Southern California region.

Based on the geotechnical report, which included a review of the referenced publications and seismic data, no faults are known to project through or immediately adjacent the site, and the site does not lie within an "Earthquake Fault Zone" as defined by the State of California in the Alquist-Priolo Earthquake Fault Zoning Act (Appendix E, *Geotechnical Investigation and Infiltration Study for Proposed Anaheim Coves Northern Extension Project, City of Anaheim, California*, Albus-Keefe & Associates, Inc., December 23, 2015). The Puente Hills (Coyote Hills) fault is located 3.53 miles away from the Project site, and the Elsinore fault is located 5.82 miles away.

Potential ground accelerations have been estimated for the site and are presented in Appendix E, *Geotechnical Investigation and Infiltration Study for Proposed Anaheim Coves Northern Extension Project, City of Anaheim, California*, Albus-Keefe & Associates, Inc., December 23, 2015 of this report. Design and construction in accordance with the current California Building Code (CBC) requirements are anticipated to address the issues related to potential ground shaking at the site, and would reduce impacts from seismic ground shaking to less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less than significant impact. Liquefaction describes the behavior of soils that, when loaded, suddenly suffer a transition from a solid state to a liquefied state, or having the consistency of a heavy liquid. Liquefaction can occur during vibratory conditions such as those induced by seismic event, under saturated conditions in soils, such as sand, in which the strength is purely frictional. A low relative density and loose consistency of the granular materials, shallow groundwater table, long duration and high acceleration of seismic shaking are some of the factors that can cause liquefaction. Presence of predominately cohesive or fine-grained materials and/or absence of saturated conditions can preclude liquefaction. Liquefaction hazards are usually manifested in the form of buoyancy forces expected on structures during liquefaction, increase in lateral earth pressures due to liquefaction, horizontal and vertical movements of structures resulting from lateral spreading, and post-earthquake settlement of the liquefied materials.

The deposits along the Santa Ana River include late Pleistocene to Holocene floodplain and stream terrace deposits. These deposits consist of unconsolidated to poorly consolidated, non-marine mixtures of sand, silt, and gravel (Department of Conservation 1997).

In the Orange Quadrangle, the liquefaction zone is located primarily within a mile of the Santa Ana River. Therefore, the Project site is located within a designated seismic "liquefaction zone" according to the State of California Seismic Hazard Map (April 15, 1998–Orange Quadrangle). The project will be constructed to the standards prescribed by the California Building Code, as amended by the City of Anaheim. Appendix E, *Geotechnical Investigation and Infiltration Study for Proposed Anaheim Coves Northern Extension Project, City of Anaheim, California*, Albus-Keefe & Associates, Inc., December 23, 2015 provides recommendations for:

- General Earthwork and Grading Specifications
- Pre-Grade Meeting and Geotechnical Observations
- Site Clearing
- Ground Preparation

- Fill Placement
- Import Materials
- Temporary Excavations

The project Geotechnical Engineering Study evaluated the structures proposed by the Project (e.g. fences, signage footings, light standards, etc.) in relation to geologic hazards and impacts. The Study concluded that the Project could be safely constructed with implementation of the Study's recommendations. Prior to issuance of grading, demolition, and/or building permits, whichever comes first, a geotechnical study will be prepared to review the grading and construction plans to verify compliance with the recommendations of project Geotechnical Engineering Study.

iv) Landslides?

No impact. Review of the Anaheim, California 7.5-minute topographic quadrangle (USGS 2007) indicates the site is nearly level with the site elevation of approximately 205 to 225 feet above mean sea level (amsl) across the site. Because of the site's level topography, landslides are not anticipated to occur on the Project site. The Seismic Hazard Zones Map illustrates the earthquake-induced landslide zones, which are areas where previous occurrence of landslide movement, or local topographic, geological, geotechnical, and subsurface water conditions indicate a potential for permanent ground displacements such that mitigation would be required. According to the Seismic Hazard Zones Map—Orange Quadrangle (Landslide Zone released April 15, 1998), the Project site is not mapped as being in an earthquake-induced landslide zone of required investigation. Therefore, project implementation would not expose people or structures to potential substantial adverse effects involving landslides.

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

Less than significant impact with mitigation incorporated. Grading on the Project site will occur on predominantly flat ground, with some minor slope areas. Grading in areas with relatively flat ground would not result in substantial soil erosion. In areas with slopes, there is a potential for soil erosion and this potential is considered significant. Mitigation Measures HYD-1 and HYD-2 in Section 3.9, Hydrology, are required to reduce potential soil erosion or loss of topsoil to less than significant. As identified in Section 1.2.2, Proposed Improvements, the development of the trail and urban nature park will result in a net export of soil.

In addition, as concluded in impact discussion 3.9.a, in the Hydrology and Water Quality section of this report, the Project would be subject to compliance with the National Pollutant Discharge Elimination System (NPDES) permitting process, since one or more acres of soil would be disturbed. Following development of increased pervious landscaping and compliance with NPDES regulatory requirements, project implementation would result in a less than significant impact involving soil erosion or the loss of topsoil. The project would require minimal grading because the Project seeks only to incorporate surface-level trail, bioswales, and native vegetation features. Therefore, impacts related to erosion would be less than significant with the implementation of the water quality mitigation measures discussed in Section 3.8, Hydrology and Water Quality.

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

Less than significant impact. Refer to impact discussions 3.6.a and 3.6.b above for discussions of potential impacts related to liquefaction and earthquake-induced landslides, respectively. As the site is relatively level, there is no potential for landslides or slope instabilities. Additionally, as the Project site has a low potential for liquefaction, the potential for lateral spreading is also low. Following compliance with the City's Building Code, project implementation would not expose people or structures to potential substantial adverse effects involving unstable geologic units or soils.

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

Less than significant impact. Expansive soils expand or contract with changes in the moisture content. Typically, these types of soils contain clay minerals that absorb water. Based the laboratory test conducted for the geotechnical study, and the USCS visual manual classification, the deposits related to the Project site primarily consist of Metz loamy sand and Riverwash material (Exhibit 10: Soils Map). Metz loamy sand is categorized by the National Cooperative Soil Survey as somewhat excessively drained while Riverwash is excessive drained, so both possess a very low expansion potential. While there is no evidence of expansive soils on this site; however, prior to construction, the contractor shall submit a soils report to the Public Works Department for review and approval. Said report will include soil testing to determine if expansiveness properties exist and if necessary, provide appropriate design measures to minimize any expansive soil hazards. Minor grading will occur on the Project site to build the trail, demonstration garden/children's education/nature play area, and bioswales. Impacts would be less than significant.

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

No impact. The project does not propose the use of septic tanks. The project would connect to the existing City sanitary sewer system for wastewater disposal. Therefore, no impacts to soils due to the use of septic systems are anticipated.

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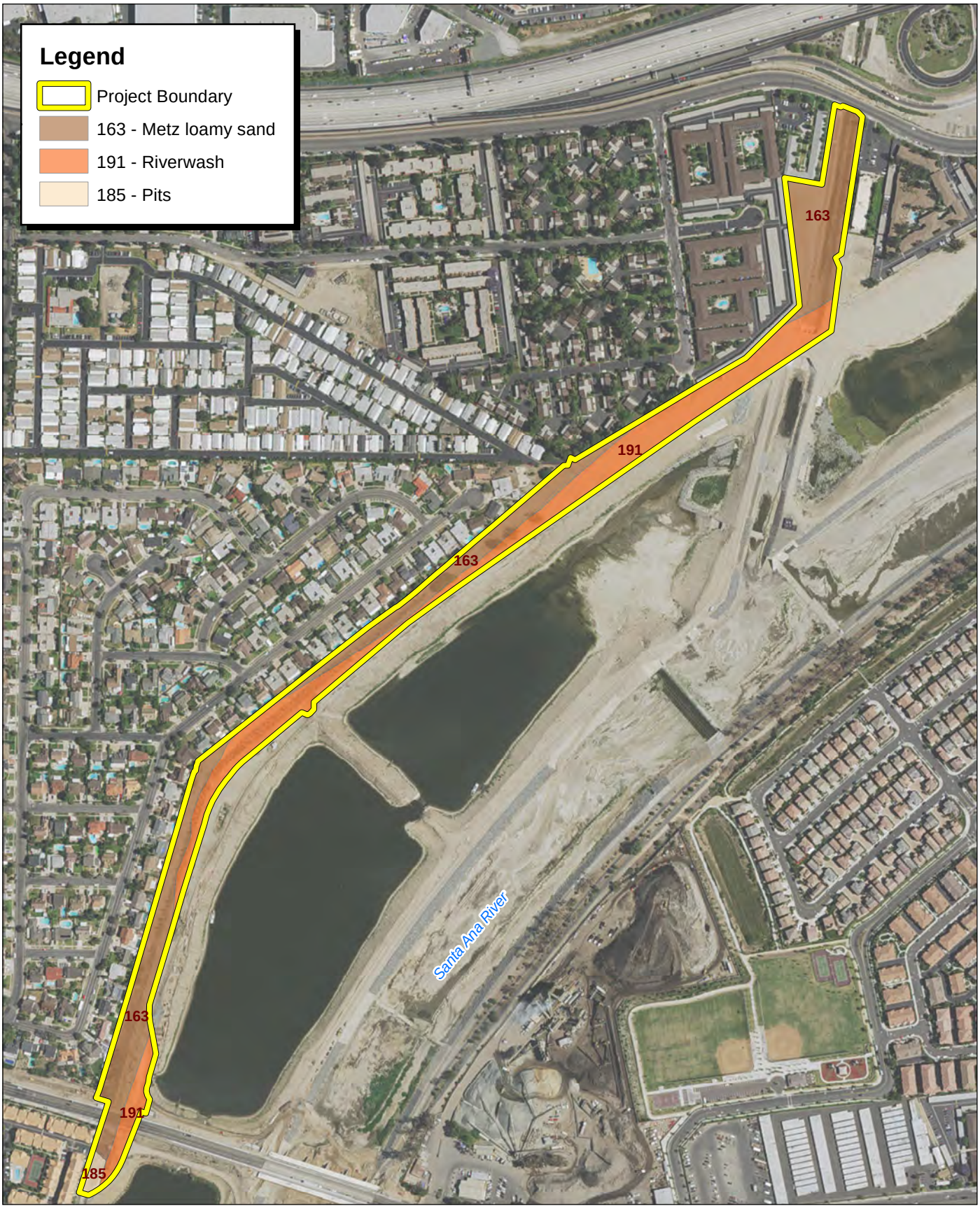

Source: USDA Soils Survey

FirstCarbon SOLUTIONS

500 250 0 500 Feet

Exhibit 10
Soils Map

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3.7 - Greenhouse Gas Emissions

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
3.7 Greenhouse Gas Emissions *Would the project:*				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Environmental Evaluation

Would the project:

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

Less than significant impact. An assessment of greenhouse gas (GHG) emissions was prepared and the results indicated that project emissions would be less than significant. The project is a linear park that would produce negligible emissions from vehicles and equipment used during maintenance activities and ranger patrols.

A variety of agencies have developed GHG emission thresholds and/or have made recommendations for how to identify a threshold. However, the thresholds for projects in the jurisdiction of the SCAQMD remain in flux. The CAPCOA explored a variety of threshold approaches, but did not recommend one approach (2008). The ARB recommended approaches for setting interim significance thresholds (ARB 2008b), in which a draft industrial project threshold suggests that non-transportation related emissions under 7,000 metric tons of carbon dioxide equivalents ($MTCO_2e$) per year would be less than significant; however, the ARB has not approved those thresholds and has not published anything since then. Both the Bay Area Air Quality Management District and the San Joaquin Valley Air Pollution Control District have developed GHG thresholds. However, those thresholds are not applicable to the Project since the Project is under the jurisdiction of the SCAQMD. The SCAQMD is in the process of developing thresholds, as discussed below.

On December 5, 2008, the SCAQMD Governing Board adopted an interim GHG significance threshold for stationary sources, rules, and plans where the SCAQMD is lead agency (SCAQMD permit threshold). However, this project is not considered a stationary source.

The SCAQMD has yet to adopt the interim significance thresholds for GHGs for local lead agency consideration (SCAQMD draft local agency threshold); however, the thresholds are supported by substantial evidence and are widely used by lead agencies within the SCAQMD. The current draft thresholds consist of the following tiered approach:

- Tier 1 consists of evaluating whether or not the Project qualifies for any applicable exemption under CEQA.
- Tier 2 consists of determining whether the Project is consistent with a greenhouse gas reduction plan. If a project is consistent with a qualifying local greenhouse gas reduction plan, it does not have significant greenhouse gas emissions.
- Tier 3 consists of screening values, which the lead agency can choose, but must be consistent with all projects within its jurisdiction. A project's construction emissions are averaged over 30 years and are added to a project's operational emissions. If a project's emissions are under one of the following screening thresholds, then the Project is less than significant:
  - All land use types: 3,000 $MTCO_2e$ per year
  - Based on land use type: residential: 3,500 $MTCO_2e$ per year; commercial: 1,400 $MTCO_2e$ per year; industrial: 10,000 $MTCO_2e$; or mixed use: 3,000 $MTCO_2e$ per year
- Tier 4 has the following options:
  - Option 1: Reduce emissions from business as usual by a certain percentage; this percentage is currently undefined
  - Option 2: Early implementation of applicable AB 32 Scoping Plan measures
  - Option 3, 2020 target for service populations (SP), which includes residents and employees: 4.8 $MTCO_2e$/SP/year for projects and 6.6 $MTCO_2e$/SP/year for plans;
  - Option 3, 2035 target: 3.0 $MTCO_2e$/SP/year for projects and 4.1 $MTCO_2e$/SP/year for plans
- Tier 5 involves mitigation offsets to achieve target significance threshold.

Thresholds of Significance for this Project

To determine whether the Proposed Project would have a significant impact with respect to the generation of greenhouse gas emissions, this analysis utilizes the interim tiered threshold. The threshold is as follows:

- Tier 1: The project is not exempt under CEQA; go to Tier 2.
- Tier 2: The city of Anaheim has adopted a GHG Reduction Plan in July 2015. However, the GHG Reduction Plan is only focused on reducing GHG emissions from energy projects as they transition from fossil fuels to renewable or cleaner fuel technology. Therefore, the GHG Reduction Plan is not a comprehensive climate action plan that would address all emissions sectors of the community. Consistency with a GHG reduction plan is discussed further in Impact GHG-2 below. Considering this information, the analysis proceeds to Tier 3. In order to provide more information, the Project is also evaluated under Tier 3.

Tier 3: project greenhouse gas emissions compared with the threshold: 3,000 $MTCO_2e$ per year (see analysis below), if the Project exceeds this threshold; go to Tier 4. Table 12: Estimated Greenhouse Gas Emissions below indicates that the emission does not exceed the threshold Section 15064.4(b) of the CEQA Guideline amendments for GHG emissions state that a lead agency may take into account the following three considerations in assessing the significance of impacts from GHG emissions.

- **Consideration #1**: The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting.
- **Consideration #2**: Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- **Consideration #3**: The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such regulations or requirements must be adopted by the relevant public agency through a public review process and must include specific requirements that reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

The analysis addresses Consideration #1 and #2. Project emissions were quantified to determine the extent the Project increases GHG emissions and compares those emissions to a threshold of significance determined by the City of Anaheim to apply to the Project.

Project Impact

Project-related GHG emissions would include emissions from direct and indirect sources. The project would results in direct and indirect emissions of CO_2, nitrogen dioxide (N_2O), and methane (CH_4). Direct project-related GHG emissions include emissions from construction activities, area sources, and mobile sources, while indirect sources include emissions from electricity consumption, water demand, and solid waste generation. Operational GHG emissions are based on energy emissions from natural gas usage and automobile emissions. CalEEMod was used to estimate GHG emissions from project construction and project operation. The operational emissions analysis utilizes trip rates from the Project's Traffic Letter Report.

Table 12: Estimated Greenhouse Gas Emissions contains the estimated GHG emissions for the Project. As provided in Table 12: Estimated Greenhouse Gas Emissions, the Project's estimated GHG emissions fall below the SCAQMD threshold of 3,000 $MTCO_2e$ per year. Therefore, this impact would be less than significant.

Table 12: Estimated Greenhouse Gas Emissions

Source	Emissions (metric tons per year)
Project Emissions	
Area	<0.01
Energy	0
Mobile	260.80
Waste	0.45
Water	105.81
Construction (total of 161.8 MT/year which would be amortized over 30 years)	5.39
Total Project Emissions	**372.45**
GHG Threshold ($MTCO_2e$)	**3,000**
Significant Impact?	No
Source of Emissions: Appendix B.2, *Combined CalEEMod Output, Winter Construction Results*, FirstCarbon Solutions, March 29, 2016. Source of Threshold: SCAQMD 2008.	

Construction

The project would emit GHGs from upstream emission sources and direct sources (combustion of fuels from worker vehicles and construction equipment). The emissions modeling represents a conservative analysis and is used to assess the Project's potential GHG impacts.

Project construction equipment and worker vehicles are estimated to generate a total of approximately 161.8 $MTCO_2e$. The emissions are from all phases of construction.

Operation

Operational or long-term emissions occur over the life of the Project. The operational emissions for the Project are shown in Table 12: Estimated Greenhouse Gas Emissions.

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

Less than significant impact. The project will provide a trail that will allow for residents in the area and employees that work in the Anaheim Canyon Business District to engage in zero emission recreational activities. In addition, the project will enhance bicycle commuting opportunities. . The project would be considered a GHG reduction measure because it would support alternatives to motor vehicle travel.

The City of Anaheim has adopted a GHG Reduction Plan in July 2015. However, this Plan is aimed to reduce reliance on fossil fuel-fired sources and to transition to renewable resources and cleaner natural gas. The plan includes a goal of reducing power supply-related GHG emissions by 20 percent from 1990 baseline levels by 2020. Since this project is proposing to develop an urban nature park that includes bike path and trail, the GHG Reduction Plan, which is focused solely on fuel sources and energy, is not applicable to this project. Therefore, the AB 32 emission reduction goal and the ARB-adopted AB 32 Scoping Plan will be used to determine consistency with an adopted plan, policy, or regulation for reducing GHGs.

The Scoping Plan states, "The 2020 goal was established to be an aggressive, but achievable, mid-term target, and the 2050 GHG emissions reduction goal represents the level scientists believe is necessary to reach levels that would stabilize climate" (ARB 2008). The year 2020 GHG emission reduction goal of AB 32 corresponds with the mid-term target established by Executive Order S-3-05, which aims to reduce California's fair-share contribution of GHGs in 2050 to levels that would stabilize the climate.

As discussed in Section 3.7, impact a) above, the SCAQMD is in the process of preparing recommended significance thresholds for GHGs for local lead agency consideration, which the Proposed Project does not exceed. As described in Section 3.7, impact a), the Proposed Project would not exceed the SCAQMD's draft threshold of significance for GHGs.

Project Construction

Construction of the Proposed Project is estimated to generate GHGs. However, AB 32 requires that GHG emissions generated in California in year 2020 be equal to or less than California's statewide inventory from 1990. Construction emissions would occur before the year 2020, so the Proposed Project's construction would not contribute to year 2020 emissions. Therefore, construction emissions would not conflict with the AB 32 emission reduction goals or the Scoping Plan.

Project Operation

The Scoping Plan identifies recommended measures for multiple GHG emission sectors and the associated emission reductions needed to achieve the year 2020 emissions target—each sector has a different emission reduction target. Most of the measures target the transportation and electricity sectors and are implemented through regulatory actions at the state level. Transportation and energy consumption are typically the largest GHG emissions sector for communities and the state of California. Therefore, projects that would help reduce transportation-related emissions used strategies consistent with the AB 32 Scoping Plan and its updates would be considered consistent with the applicable GHG reduction plan.

The Proposed Project would include a linear park that is intended to provide recreational as well as commute options for residents within the City. The linear park is not a large generator of emissions (i.e., 12% of SCAQMD's interim threshold of significance), but would provide street lighting for safety during nighttime and would attract some vehicle trips from park users. With respect to transportation-related emissions, the Proposed Project would provide a corridor where residents can use walking or biking to reach employment centers and/or recreational opportunities. Thus,

although the precise number of commute and recreational vehicle trips that would be eliminated or reduced in length resulting from the Proposed Project cannot be determined at this time, one of its functions is to provide non-carbon modes of transportation to residents and visitors. Therefore, based on the relatively low intensity nature of the Proposed Project and its design and intent to reduce transportation-related GHG emissions, the Project would be consistent with the overall goals of the AB 32 Scoping Plan. This impact would be less than significant.

3.8 - Hazards and Hazardous Materials

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

The Anaheim Five Coves (Northern Extension) Park Project IS/MND included an Environmental Database Review that encompassed the Project site, in 2014. The following databases were reviewed to determine the potential presence of hazardous material sites associated with the Anaheim Coves project site. The approximately 9-acre project site was not listed in any of the databases searched by EDR. However, sites near the Project site were identified in the search. The results of the 2014 database review are provided below and in Appendix F.1, *The EDR Radius Map™ Report*, Environmental Data Resources, June 3, 2014 of this Initial Study. The results are as follows:

Federal Databases

National Priority List: No listings were reported on the Project site or within the search radius of the Anaheim Coves project site and no sites de-listed from the National Priority List were located within 0.5 mile of the Project site.

Federal CERCLIS NFRAP site List: No listings were reported on the Project site or within the search radius of the Anaheim Coves project site. One listing was reported within approximately 0.5 miles of the Anaheim Coves project site (the Burris Sand Pit, 15292 E. Lincoln Avenue). This site was monitored until 1987, does not qualify for listing on the National Priority List, and does not present an environmental hazard for the Proposed Project.

Federal RCRA CORRACTS facilities list: No listings were reported on the Project site or within the search radius of the Anaheim Coves project site. CORRACTS is a list of handlers with RCRA Corrective Action Activity. This report shows which nationally defined corrective action core events have occurred for every handler that has had corrective action activity. There is one CORRACTS site within approximately 1 mile of the Anaheim Coves project site (Orange Precision Circuits, 812 Southern Avenue). However, the site is permitted to engage in the treatment, storage or disposal of hazardous waste. This site is not considered an environmental concern.

State Databases

California Department Toxic Substance Control: The database provides information about sites that are known to be contaminated with hazardous substances as well as information on uncharacterized properties where further studies may reveal problems. Two sites were listed within approximately one mile of the Anaheim Coves project site (SA Recycling Anaheim, 3200 E. Frontera Street and Duckett Reality Anaheim Property, 2811 E. Lincoln Avenue). According to the database, the case status was listed as No Further Action. Further, there are 10 EnviroStor (the Department of Toxic Substance Control's Site Mitigation and Brownsfields Reuse Program) over 0.5 mile from the Project site. Based on the location of these sites, which are further than 0.25 mile from the Project site, the listed sites were not considered an environmental concern to the Project site.

State List of Solid Waste Landfill Sites: No listings were reported within one half mile of the OCWD project site.

State and Tribal List of Leaking Underground Storage Tanks: No listings were reported on the Project site or within the search radius of the Anaheim Coves project site. There are two sites on this list that are between 0.25 and 0.5 mile of the Project site (RJ Noble Co., 15505 Lincoln, and Santa

Ana Valley Irrigation System, south of Lincoln and Batavia Streets). Based on the location of these sites, which are further than 0.25 mile from the Project site, the listed sites were not considered an environmental concern to the Project site.

State List Permitted Underground Storage Tanks/Above Ground Storage Tanks: Eleven sites were reported within 0.25 to 0.5 mile of the Project site. All tanks were permitted, and no documented releases were known to occur. Based on the fact that all of the tanks were permitted, that there were no known releases, and that the distance is greater than 0.25 mile from the Project site, the presence of the tanks are not considered an environmental concern.

Local Databases

Local Brownfield Lists: This list includes National Brownfields sites. No listings were reported on the Project site or within the search radius of the Anaheim Coves project site.

Local Lists of Landfill/Solid Waste Disposal Sites: This list includes Open Dump Inventory, Torres Martinez Reservation Illegal Dump Site Locations, Recycler Database, Registered Waste Tire Haulers, and Open Dumps on Indian Lands. No listings were reported on the Project site or within the search radius of the Anaheim Coves project site. Four sites were identified at distances greater than 0.25 mile of the Project site and are not considered an environmental concern.

Local Lists of Hazardous Waste/Contaminated Sites: This list includes Clandestine Drug Labs, the National Clandestine Laboratory Register, and the Toxic Pits Cleanup Act Sites. No listings were reported on the Project site or within the search radius of the Anaheim Coves project site. One site was identified approximately 1 mile from the Project site (Orange County Steel Salvage, 3200 E. Frontera Street) and is not considered an environmental concern.

Environmental Evaluation

Would the project:

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

Less than significant impact. The long-term operation of the Proposed Project would not involve the routine transportation, disposal or emission of hazardous materials or waste. However, construction operations associated with the Proposed Project could involve the handling of incidental amounts of hazardous materials, such as fuels and oil. The Proposed Project would be required to comply with local, state, and federal laws and regulations regarding the handling and storage of hazardous materials. Additionally, during construction operations, a Storm Water Pollution Prevention Plan would be implemented that would specify hazardous material spill prevention and management practices. Compliance with local, state, and federal laws and regulations would reduce potential hazardous material safety impacts to a level considered less than significant. No mitigation measures are required.

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

Less than significant impact. The long-term operation of the Proposed Project would not involve even the limited use of hazardous materials. However, construction operations associated with the Proposed Project could involve the handling of incidental amounts of hazardous materials, such as fuels and oil. The Proposed Project would be required to comply with local, state, and federal laws and regulations regarding the handling and storage of hazardous materials. Additionally, during construction operations, a Storm Water Pollution Prevention Plan would be implemented that would specify hazardous material spill prevention and management practices. Compliance with local, state, and federal laws and regulations would reduce potential hazardous material safety impacts to a level considered less than significant. No mitigation measures are required.

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

No impact. The nearest schools to the Project site include Rio Vista Elementary School at 310 N Rio Vista Street, Anaheim (approximately 0.40 mile); Sunkist Elementary School at 500 N Sunkist Street, Anaheim (approximately 0.92 mile); and Juarez (Benito) Elementary School at 841 S Sunkist Street, Anaheim (approximately 1.15 miles). The long-term operation of the Proposed Project would not emit hazardous emissions, or involve the handling of hazardous or acutely hazardous materials, substances, or waste. During construction operations, the handling of hazardous materials (such as gasoline and petroleum) would be in compliance with local, state, and federal laws and regulations. Further, there are no schools located within 0.25 mile of the Project site. There would be no impact.

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

No impact. The regulatory database reviewed for the Anaheim Coves Park project site indicate that the site is not contained within a listed hazardous materials site. Therefore, implementation of the Proposed Project would result in no hazardous materials impact.

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 for people residing or working in the project area?

No impact. The project site is not located within the boundaries of an adopted Airport Land Use Plan. The Proposed Project would not result in a safety hazard for people working in or recreating within the Project site. No impact would occur.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No impact. The Proposed Project is not located within the vicinity of a private airstrip, heliport, or helistop. The Proposed Project would not result in a safety hazard for people working in or recreating within the Project site. No impact would occur.

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

No impact. According to the City of Anaheim's General Plan Safety Element Emergency Facilities and Hazardous Area Map, the Project site will not negatively impact any adopted emergency evacuation plan or emergency response plan. Project construction would be required to comply with the City's codes to allow adequate emergency vehicle access. In addition, the Proposed Project does not propose any road improvements or alterations and the surrounding roadways would continue to provide emergency access throughout the Project site and to surrounding properties during project construction. No impact would occur.

h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No impact. According to the City of Anaheim's General Plan Safety Element Fire Protection Areas, the Project site is not situated in the vicinity of any Very High Fire Hazards Severity Zone and Special protection Area; therefore, eliminating the threat of loss, injury, or death from wildland fires. No impact would occur.

3.9 - Hydrology and Water Quality

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.9. Hydrology and Water Quality *Would the project:*				
a) Violate any water quality standards or waste discharge requirements?	☐	☒	☐	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐
e) 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?	☐	☐	☒	☐
f) Otherwise substantially degrade water quality?	☐	☒	☐	☐
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

The project site is located within the lower Santa Ana River Watershed. The Santa Ana River Watershed is the largest watershed in coastal Southern California, consisting of 2,800 square miles and encompassing parts of Riverside, San Bernardino, Los Angeles and Orange Counties. The Santa Ana River (SAR) is the most prominent hydrologic feature within the watershed, and is located immediately adjacent to the Project site. The SAR is over 100 miles long and has over 50 contributing tributaries. The headwaters for the SAR are in the San Gabriel and San Bernardino Mountains to the north. The river extends westerly through the Santa Ana Valley to the Prado Basin where it is joined by several tributaries near Prado Dam. Downstream of Prado Dam, the SAR flows through the Santa Ana Mountain Canyon into Orange County before discharging into the Pacific Ocean.

The flows of the SAR consist of storm flows and perennial flow (base flow) that increases in the winter and decreases in the summer. The base flow of the SAR consists almost entirely of treated municipal wastewater discharged upstream of the Prado Basin. Base flow below Prado Dam generally remains below 200 cubic feet per second (cfs) in the summer and below 300 cfs in the winter. Annual storm flows varies widely year to year ranging from a low of approximately 10,600 acre-feet in 2002 to a high of 439,000 in 1993. Both storm flow and base flow of the SAR are expected to increase with the urbanization of the watershed.

Santa Ana Region Water Quality Control Plan

The Water Quality Control Plan for the Santa Ana Region designates the beneficial uses of receiving waters, including Reach 2 of the Santa Ana River to which the Project site currently discharges to and would discharge to at build-out. Reach 2 of the Santa Ana River lies between Prado Dam and 17th Street in Santa Ana and beneficial uses include agriculture, groundwater, contact water recreation, non-contact water recreation, water freshwater habitat, wildlife habitat, and rare, threatened or endangered species. The downstream reach of the Santa Ana River (Reach 1) has no additional beneficial uses. Both reaches have been excepted from municipal uses.

When designated beneficial uses of a particular water body are compromised and fail to meet water quality objectives, Section 303(d) of the CWA requires identifying and listing that water body as "impaired." Once a water body has been deemed impaired, a Total Maximum Daily Load (TMDL) must be developed for each water quality constituent that compromises a beneficial use. A TMDL is an estimate of the total load of pollutants, from point, nonpoint, and natural sources, that a water body may receive without exceeding applicable water quality standards (often with a "factor of safety" included). Once established, the TMDL is allocated among current and future dischargers into the water body. Pursuant to Section 303(d) of the CWA, the reach of the river in which the Platinum Triangle lies (Reach 2 of the Santa Ana River) has not been listed as being impaired for any pollutants, nor has the downstream reach, Reach 1. Likewise, no TMDLs have been developed for any reach of the Santa Ana River.

Groundwater

The SAR has been the primary source of water to recharge the Orange County Groundwater Basin since the 1950s. OCWD has been diverting water from the SAR for groundwater recharge. Surface

water flows of the SAR are diverted into a series of recharge basins to replenish the groundwater basin. Virtually all of the base flow of the SAR is captured by OCWD for groundwater recharge.

Only a portion of the total storm flow of the SAR is captured by OCWD for groundwater recharge. The volume of groundwater recharge from storm flow is a function of precipitation intensity, duration, impervious area and distribution of storms over a given year. Although storm flows average approximately 33 percent of the total SAR flows, they average a lower percentage of the total water recharged. This is primarily because the magnitude of storm flow releases from Prado Dam often greatly exceeds the percolation capacity of the spreading basins. Stormwater that is not captured by OCWD is lost to the ocean.

Environmental Evaluation

Would the project:

a) Violate any water quality standards or waste discharge requirements?

Less than significant impact with mitigation incorporated. Project-related impacts related to water quality could occur over three different periods:

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

A reduction of impervious surfaces on-site, as proposed, would be considered a benefit to water quality, as impervious surfaces do not allow for rain and runoff to infiltrate into the ground. Infiltration both reduces the amount of flow that is capable of washing off additional pollutants and filter water removing potential pollutants. These changes have the potential to affect long-term water quality.

The approximately 9-acre project site currently consists of scattered vegetation, a cinderblock wall, and an access road. The design features of the Proposed Project benefit water quality by increasing site permeability. The trail materials will be permeable asphalt and decomposed granite, which both allow stormwater infiltration on a site favorable for permeability. (Please see Appendix E, *Geotechnical Investigation and Infiltration Study for Proposed Anaheim Coves Northern Extension Project, City of Anaheim, California*, Albus-Keefe & Associates, Inc., December 23, 2015.PP.) The Proposed Project will include native plantings throughout, which also serve to enhance infiltration and decrease runoff on the site. The long-term operation of the Project will divert most of the on-site drainage into “bio-swales” to remove silt and pollution from surface runoff. These structures will generally consist of a swaled-drainage course with gently sloped sides (less than six percent) and filled with vegetation, compost and/or riprap. The water’s flow path within these bio-swales will be

designed to maximize the time water spends in the swale, which will aid in the trapping of pollutants and silt. Stormwater will not be channeled to infrastructure off-site, but will infiltrate on-site. This represents an improvement over existing conditions. Based on the proposed design of the Project, long-term operations would result in less than significant impacts to water quality standards.

National Pollutant Discharge Elimination System

Under Section 402 of the Clean Water Act, the United States Environmental Protection Agency (EPA) has established regulations under the NPDES program to control direct stormwater discharges from construction activities disturbing 1 acre or more of land. The Proposed Project will disturb more than one acre of land. In California, the State Water Resources Control Board (SWRCB) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The NPDES program regulates industrial pollutant discharges, which include construction activities. The SWRCB works in coordination with the RWQCBs to preserve, protect, enhance, and restore water quality. The City is within the jurisdiction of the Santa Ana RWQCB (SARWQCB).

Short-term Construction

Dischargers whose projects disturb one or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading and disturbances to the ground, such as stockpiling, or excavation, but it does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. To obtain coverage for discharges under the General Construction Permit, dischargers are required to electronically file the Permit Registration Documents (PRDs), which include a Notice of Intent (NOI), Storm Water Pollution Prevention Plan (SWPPP), and other compliance related documents required by the General Permit and mail the appropriate permit fee to the State Water Board.

The Proposed Project would disturb one or more acres, thus, would be required to obtain coverage under the Construction General Permit and prepare a SWPPP. The SWPPP is required to contain a site map(s), which shows the construction site perimeter, existing and proposed buildings, lots, roadways, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the Project site. The SWPPP is required to list Best Management Practices (BMPs)[2] the discharger will use to protect stormwater runoff and the placement of those BMPs. Additionally, the SWPPP must contain a visual monitoring program; a chemical monitoring program for "non-visible" pollutants to be implemented if there is a failure of BMPs; and a sediment monitoring plan if the site discharges directly to a water body listed on the 303(d) list for sediment. Section A of the Construction General Permit describes the elements that must be contained in a SWPPP.

[2] BMP means any program, technology, process, siting criteria, operational methods or measures, or engineered systems, which when implemented prevent, control, remove, or reduce pollution.

Overall, the Project's demolition and construction activities would be subject to compliance with NPDES requirements, which include obtaining coverage under the General Construction Permit by filing the Permit Registration Documents (an NOI and SWPPP, among others), as well as the pertinent provisions of the AMC. Compliance with the NPDES and AMC requirements would ensure that the Project's construction-related impacts to water quality would be less than significant.

Long-term Operations

The Municipal Storm Water Permitting Program regulates stormwater discharges from municipal separate storm sewer (drain) systems (MS4s). Most of these permits are issued to a group of co-permittees encompassing an entire metropolitan area. The MS4 permits require the discharger to develop and implement a Storm Water Management Plan/Program with the goal of reducing the discharge of pollutants to the maximum extent practicable (MEP). MEP is the performance standard specified in Section 402(p) of the Clean Water Act. The management programs specify what BMPs will be used to address certain program areas. The program areas include public education and outreach; illicit discharge detection and elimination; construction and post-construction; and good housekeeping for municipal operations.

The OCFCD, the County of Orange, and the City of Anaheim, along with 51 other incorporated cities therein (Permittees) discharge pollutants from their MS4s. Stormwater and non-stormwater enter and are conveyed through the MS4s and are discharged to surface water bodies of the Orange Region. These discharges are regulated under countywide waste discharge requirements contained in Order No. R8-2009-0030 (as amended by Order No. R8-2010-0062), Waste Discharge Requirements for the County of Orange, OCFCD, and the Incorporated Cities of Orange County within the Santa Ana Region Area wide Urban Storm Water Runoff Orange County, which was approved on May 19, 2011. Order No. R8-2009-0030, which serves as an NPDES permit, has expired but remains in effect until the Orange Water Board adopts a new permit.

The Permit requires the development and implementation of a program addressing stormwater pollution issues in development planning for private projects. The primary objectives of the municipal stormwater program requirements are to (1) effectively prohibit non-stormwater discharges; and (2) reduce the discharge of pollutants from stormwater conveyance systems to the MEP statutory standard.

As noted above, the Project would be undertaken in accordance with the Orange County DAMP (refer to AMC Chapter 10.09). Prior to issuance of a Grading or Building Permit for the Project, the Public Works Department would review the Project plans and impose terms, conditions, and requirements on the Project, as needed. Additionally, the Project would be subject to compliance with the City's Storm Drainage Master Plan Program, which addresses compliance with the 2003 DAMP.

Overall, the Project would be subject to compliance with NPDES, DAMP, and AMC would ensure that the long-term project-related impacts to water quality would be less than significant.

The following are the mitigation measures required to reduce potential short-term construction impacts on water quality.

MM HYD-1 The City of Anaheim shall prepare and submit to OCWD a Stormwater Pollution Prevention Plan (SWPPP) that identifies measures to maintain water quality during construction operations. The plan will be filed through the Storm Water Multiple Application and Report Tracking System (SMARTS). The water quality measures shall include silt fencing on the western side of the trail as well as straw waddles in sloped areas to prevent uncontrolled surface water flow into the basin during construction and until vegetation is reestablished. Approval of the plan from OCWD will be obtained prior to submittal of the document to the Regional Water Quality Control Board.

MM HYD-2 Notice of Intent and SWPPP shall be filed with the Regional Water Quality Control Board. This requirement for filing the Notice of Intent and SWPPP shall be included in the plans and specifications for the Project.

MM HYD-3 Prior to the start of construction operations, the City shall prepare and submit to OCWD a plan that shows the location and when the structural and non-structural Best Management Practices (BMPs) would be implemented at the Project site.

MM HYD-4 In the event the proposed permeable asphalt trail surface and the proposed bio swale system create a prolonged water ponding condition, the City shall coordinate with OCWD and implement additional measures to prevent the ponding of water and to ensure that the Project provides adequate drainage.

In addition to the above mitigation measures, Mitigation Measures BIO-1 and BIO-2 would also reduce potential short-term impacts on water quality.

b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted?

No impact. The Proposed Project will not lead to a depletion of groundwater supply because it does not involve the direct use of groundwater and will not develop any wells. In addition, the Project will not impact or interfere with the general operations and maintenance of the OCWD groundwater recharge basins. No impact would occur.

c) Substantially alter the existing drainage pattern of area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Less than significant impact. The Proposed Project would use the existing drainage system on-site and would not affect existing drainage system on-site. Any modifications will merely be minor

improvements of the existing system, such as cleaning any stopped drains until they are functional. The Proposed Project would include permeable asphalt and decomposed granite that would allow water to percolate into the ground. Surface water would also flow to the bioswales installed as part of the Project to convey water to on-site catch basins. The installation of native plants for landscaping would also limit the amount of erosion that would take place on-site.

The project site is adjacent to a drainage channel that flows into the Santa Ana River is present along the northern section. The channel, known as the Carbon Canyon Diversion Channel, begins nearly a mile north at the Kraemer Basin and Carbon Canyon Creek. The Channel is lined with gravel and rocks along both berms and contains scattered disturbed wetland habitat. The proposed construction and operations of the Project would not alter, affect, or modify this drainage channel in any way, although the possibility of pollutants reaching the drainage exists. In accordance with the National Discharge Pollutant System, a Notice of Intent will be filed with the RWQCB and a SWPPP will be developed, approved and implemented that include bio-swales to prevent or reduce pollutants from leaving the site or reaching the diversion channel.

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less than significant impact. The Proposed Project would use the existing drainage system on-site and would not affect existing drainage system on-site. The Proposed Project seeks to improve the site permeability, thereby improving site's existing drainage system. The Proposed Project would include permeable asphalt and decomposed granite that would allow water to percolate into the ground while the remaining water would be directed into bio-swales that would convey the water to the existing on-site catch basins. These modifications to the site will act as minor improvements of the existing system, including the addition of bioswales for stormwater collection and the regular maintenance of the drains affiliated with the bioswales. The installation of native landscaping on-site, where such vegetation does not currently exist, would serve to improve the drainage patterns on-site by slowing, diverting, and absorbing stormwater flows.

As described above, the Project site is adjacent to a drainage channel that flows into the Santa Ana River is present along the northern section. The channel, known as the Carbon Canyon Diversion Channel, begins nearly a mile north at the Kraemer Basin and Carbon Canyon Creek. The Channel is lined with gravel and rocks along both berms and contains scattered disturbed wetland habitat. The proposed construction and operations of the Project would not alter, affect, or modify this drainage channel in any way, although the possibility of pollutants reaching the drainage exists. In accordance with the National Discharge Pollutant System, a Notice of Intent will be filed with the RWQCB and a SWPPP will be developed, approved and implemented that include bio-swales to prevent or reduce pollutants from leaving the site or reaching the diversion channel.

Therefore, the Proposed Project would result in less than significant impacts to the existing drainage pattern.

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

Less than significant impact. The Proposed Project would not contribute to the runoff of stormwater in a way that would exceed the capacity of the existing, or the proposed stormwater drainage improvements for the Project. Any modifications to the site will act as minor improvements to the site's overall stormwater drainage and would reduce polluted runoff by first storing it in vegetated bioswales. The Proposed Project would include permeable asphalt and decomposed granite that allows water to percolate into the ground. New bioswales installed as part of the Project would convey stormwater to on-site catch basins. The installation of native landscaping on-site where it does not currently exist would serve to limit the amount of runoff being conveyed on-site, and would limit the amount of erosion taking place on-site by slowing, diverting, and absorbing stormwater flows. The long-term operation of the site would not produce or contribute to polluted runoff as all stormwater runoff would be contained on-site. Impacts would be less than significant.

f) Otherwise substantially degrade water quality?

Less than significant impact with mitigation incorporated. As discussed above, short-term construction activities could result in significant water quality impacts. Mitigation Measure HYD-1 through HYD-4 and BIO-7 are recommended to reduce water quality impacts during construction. Overall, the Project would be subject to compliance with NPDES, DAMP, and AMC would ensure that the long-term project-related impacts to water quality would be less than significant.

g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No impact. The northern and southernmost portions of the Project site are located within a 100-year floodplain Federal Emergency Management Agency Flood Insurance Rate Map (Exhibit 11: 100 and 500-year Floodplain Map). However, the Proposed Project does not include housing. There would be no impact.

h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No impact. The northern and southernmost portions of the Project site are located within a 100-year floodplain Federal Emergency Management Agency Flood Insurance Rate Map (Exhibit 11: 100 and 500-year Floodplain Map). However, the Proposed Project would not place structures that would impede flood flow in these areas. There would be no impact.

i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

No impact. The northern and southernmost portions of the Project site are located within a 100-year floodplain Federal Emergency Management Agency Flood Insurance Rate Map (Exhibit 11: 100 and 500-year Floodplain Map). East of the Project site is the levee of the Santa Ana River. The USACE constructed the levee to insure 200-year flood protection to Orange County. There would be no impact.

j) Inundation by seiche, tsunami, or mudflow?

No impact. The project site is located adjacent to a groundwater recharge basin that is generally filled with water. While the basin could feasibly experience water movement during violent ground shaking, the impacts would be less than significant due to the basin's moderate size and shallow depth. No structures are located along the basin slopes and no development would be impacted seiche.

A tsunami is a sea wave generated by an earthquake, landslide, volcanic eruption, or even by a large meteor hitting the ocean. An event such as an earthquake creates a large displacement of water resulting in a rise or mounding at the ocean surface that moves away from this center as a sea wave.

Tsunamis generally affect coastal communities and low-lying (low-elevation) river valleys in the vicinity of the coast. Buildings closest to the ocean and near sea level are most at jeopardy.

According to the Safety Element of the General Plan, the Project site is not located within an area subject to a seiche, tsunami, or mudflow. According to the California Geological Survey Orange County Tsunami Inundation Maps, the Project site is not located within a tsunami inundation area.

Potential risk from mudflow (i.e., mudslide, debris flow) does not exist within the Project site, as steep slopes are not located on or in proximity to the Project site.

Therefore, project implementation would not expose people or structures to potential hazards from inundation by seiche, tsunami, or mudflow. No impact would occur.

Source: FEMA, Dec 2, 2009

FirstCarbon SOLUTIONS

750 375 0 750 Feet

Exhibit 11
100 and 500-year Floodplain Map

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3.10 - Land Use and Planning

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.10 Land Use and Planning *Would the project:*				
a) Physically divide an established community?	☐	☐	☐	☒
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
c) Conflict with any applicable habitat conservation plan or natural communities conservation plan?	☐	☐	☐	☒

Environmental Evaluation

Would the project:

a) Physically divide an established community?

No impact. The current Proposed Project will not physically divide an established community because the Proposed Park is located adjacent to single family residential homes to the west while to the east is OCWD groundwater recharge ponds, which are not considered part of the established urban community since the recharge basins currently restrict public access. Therefore, no impacts are anticipated for the Project to physically divide an established community.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Less than significant impact. The Project site is made up of parts of 10 parcels: seven are owned by OCWD, two are owned by OCFCD, and one is owned by SCE. The parcels are zoned Transition (T), with the exception of one parcel owned by OCWD that is in Unincorporated Orange County. The parcels are a mix of general plan designations: Water, Open Space, Parks, Residential Low, and Residential Medium. The project will not conflict with any land use plan, policy or regulation of any agency having jurisdiction over the area. The project is consistent with Goal 4.1 of the General Plan to "Maximize the recreational and scenic potential of existing reservoirs, basins and waterways."

However, while the project is consistent with these land uses designations and goal of the General Plan, it does present a change to the historical use of the site, which has been minimal activity on property owned by public agencies, with occasional use by recreationalists passing through and intermittent maintenance vehicle access. Implementation of the Proposed Project would open the Project site to public use of an established park, transitioning the use of the site to one that will allow cyclists, equestrians, and other trail users permitted access. A native plant buffer will be established between the trail and the homes that abut the site. This buffer is intended to enhance privacy, buffer noise, and enhance the aesthetic quality of the site for the adjacent homes. Therefore, impacts are anticipated for the conflicts with any applicable land use plan, policy or regulation of an agency with jurisdiction over the Project, and impacts occurring as a result of the change of use on the site would be less than significant.

c) Conflict with any applicable habitat conservation plan or natural communities conservation plan?

No impact. The June 2013 OCWD Habitat Management Plan applies to the OCWD Five Coves Mitigation Site within the Project site, and to adjacent areas, and is currently being implemented by the OCWD. The OCWD Habitat Management Plan was developed to compensate for impacts to Waters of the U.S. and Waters of the State associated with implementation of the OCWD Groundwater Recharge Facilities Maintenance Plan. The plan details OCWD compensatory mitigation requirements. The OCWD Habitat Management Plan has been prepared in accordance with the USACE Final Rule on Compensatory Mitigation for Losses of Aquatic Resources and has been prepared to meet the CDFW compensatory mitigation requirements for a Streambed Alternation Agreement and the Regional Water Quality Control Board compensatory mitigation requirement for 401 Water Quality Certification. Under the terms of the OCWD Habitat Management Plan, OCWD is required to provide approximately 2.0 acres of mitigation area each year for the life of the regional maintenance permits. The OCWD Habitat Management Plan identifies seven mitigation sites and a combination of restoration activities proposed at each mitigation site. Additionally, the OCWD Habitat Management Plan establishes mitigation monitoring procedures, performance standards, and adaptive management measures to ensure the success of each mitigation site. One of the seven mitigation sites included in OCWD Habitat Management Plan is the Five Coves Basin Mitigation Site.

The intent of the Five Coves Mitigation Site is to create native open space buffer between Five Coves Basin and existing residential land uses that would foster wildlife management, while allowing groundwater management activities to occur in Five Coves Basin. The Five Coves Mitigation Site was planted in 2010 and 2014 and has been monitored in accordance with the Orange County Habitat Management Plan. As of 2015, the mitigation area has achieved all of its annual growth performance requirements. The Proposed Project was designed as not interfere with the Five Coves Mitigation Site either directly or indirectly, and mitigation is provided in Section 3.4, Biological Resources to further prevent any impact to the mitigation area. These protections for the mitigation area will ensure that OCWD meets the obligations of the June 2013 OCWD Habitat Management Plan. There would be no impact.

3.11 - Mineral Resources

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.11 Mineral Resources *Would the project:*				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Environmental Evaluation

Would the project:

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

No impact. As indicated on the "Mineral Resource Map" (Figure G-3), of the Green Element of the Anaheim General Plan, the Project site is partially designated as Mineral Resource Zone-2 (MRZ-2). The MRZ in the City of Anaheim are areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence. The site is presently used by the OCWD to access the Anaheim Five Coves groundwater recharge basins and mitigation areas owned and maintained by the OCWD. Where gravel quarry activities existed in the Project vicinity between 1928 until the early 1970s, since 1973 no mineral extraction has occurred at the site (MBA 2009). There would be no impact.

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

No impact. The Proposed Project would not result in the loss of availability of a locally important mineral resource site delineated on a local general plan, specific plan or other land use plan. There would be no impact.

3.12 - Noise

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.12 Noise *Would the project result in:*				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
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 expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Environmental Evaluation

Characteristics of Noise

Noise is defined as unwanted sound. Sound levels are usually measured and expressed in decibels (dB) with 0 dB corresponding roughly to the threshold of hearing. Most of the sounds that we hear in the environment do not consist of a single frequency, but rather a broad band of frequencies, with each frequency differing in sound level. The intensities of each frequency add together to generate a sound. Noise is typically generated by transportation, specific land uses, and ongoing human activity.

The standard unit of measurement of the loudness of sound is the decibel (dB). The 0 point on the dB scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Changes of 3 dB or less are only perceptible in laboratory environments. A change of 3 dB is the lowest

change that can be perceptible to the human ear in outdoor environments, while a change of 5 dBA is considered to be the minimum readily perceptible change to the human ear in outdoor environments.

Since the human ear is not equally sensitive to sound at all frequencies, the A-weighted decibel scale (dBA) was derived to relate noise to the sensitivity of humans. The scale gives greater weight to the frequencies of sound to which the human ear is most sensitive. Furthermore, the A-weighted sound level is the basis for a number of various sound level metrics, including the day/night sound level (L_{dn}) and the Community Noise Equivalent Level (CNEL), both of which represent how humans are more sensitive to sound at night.[3] In addition, the equivalent continuous sound level (L_{eq}) is the average sound energy of time-varying noise over a sample period and the L_{max} is the maximum instantaneous noise level occurring over a sample period.

Existing Conditions

The existing noise levels next to sensitive receptors along the Project alignment were documented through an ambient noise monitoring effort conducted at three locations on the Project site.

The noise measurements were taken on Monday, October 17, 2016 during midday peak noise hours between 1:30 p.m. and 2:30 p.m. The noise measurement data sheets are provided in Appendix A, *City of Anaheim Community Services Department Anaheim Coves Operation and Maintenance Plan* December 14, 2016 of this document. The noise monitoring locations were selected in order to document existing daytime ambient noise levels adjacent to existing noise-sensitive receptor land uses adjoining the Project site. The noise measurement locations are described in Table 13: Noise Monitoring Summary below, which contains a summary of the noise measurement results. These noise measurements captured noise from all noise sources in the Project vicinity, including noise levels from traffic on adjacent roadways and from stationary operational noise.

Table 13: Noise Monitoring Summary

Site Location	Location Description—Primary Noise Sources	dBA L_{eq}	dBA L_{max}	dBA L_{min}
ST-1	Approximately 140 feet north of E Lincoln Avenue, 10 feet from residential property line	63.5	79.2	48.9
ST-2	Approximately 75 feet from rear property line of residence at 118 S Trevor Street	50.5	56.6	45.5
ST-3	Edge of sidewalk in southeast corner of intersection of N Armando Street and Via Ferrari	49.4	61.5	43.4
Source: FirstCarbon Solutions, 2016.				

[3] L_{dn} is the 24-hour A-weighted average sound level from midnight to midnight, obtained after the addition of 10 decibels to sound levels occurring in the night between 10:00 p.m. and 7:00 a.m. CNEL is the 24-hour A-weighted average sound level from midnight to midnight, obtained after the addition of 5 decibels to sound levels occurring in the evening from 7:00 p.m. to 10:00 p.m. and after the addition of 10 decibels to sound levels occurring in the night between 10:00 p.m. and 7:00 a.m. Source: Harris, Cyril M. 1998. Handbook of Acoustical Measurement and Noise Control.

Regulatory Framework

City of Anaheim addresses noise in the Noise Element of the General Plan and in the Noise Ordinance of the Municipal Code. The City of Anaheim has adopted, as part of its Noise Element, the State of California Office of Noise Control Standards. However, these standards do not have an established threshold for new trail land use development. Policies of the noise element that are particularly applicable to this project include restrictions on construction noise. Construction activities on weekends or holidays are discouraged except in the case of construction near schools where these operations could disturb the classroom environment. In addition, construction equipment are required to operate with mufflers and intake silencers no less effective than originally equipped. The use of portable noise barriers for heavy equipment operations performed within 100 feet of existing residences are encouraged. The noise element also requires for any project generating increased traffic and subsequent increases in the ambient noise level adjacent to noise-sensitive land uses provide appropriate mitigation measures.

The City of Anaheim has the authority to set land use noise standards and place restrictions on private activities that generate excessive or intrusive noise. The applicable standards for these activities are specified in the Anaheim Municipal Code. Chapter 6.70, Sound Pressure Levels of the Anaheim Municipal Code limits sound levels for stationary sources of noise radiated for extended periods from any premises in excess of 60 dBA at the property line. Sound created by construction within the City is exempt from the requirements of the Municipal Code if it is conducted from 7:00 a.m. to 7:00 p.m.

Environmental Evaluation

Would the project result in:

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less than significant impact with mitigation incorporated. Noise levels in the Project site would be influenced by construction activity in the short-term, during the projected 4- to 6-month construction period. Long-term operational noise impacts of the Project would result from project vehicular trips and parking lot activities and the recreational use of the trail.

Short-term Construction Impacts

The Proposed Project would construct an urban nature park with a permeable asphalt bicycle path and decomposed granite multi-use trail, and a demonstration garden/children's education/nature play area with nature-based play amenities. These construction activities could result in short-term noise impacts to nearby sensitive receptors. Noise impacts associated with the construction of the Proposed Project would result from the noise generated by construction equipment, equipment location, the sensitivity of nearby land uses, and the timing and duration of the construction activities.

Two types of short-term noise impacts could occur during the construction of the Proposed Project. First, construction crew commutes and the transport of construction equipment and materials to the Project site would incrementally increase noise levels on access roads leading to the Project site. Although there would be a relatively high single-event noise exposure potential causing intermittent noise nuisance along existing roadways in the Project vicinity, the effect on longer-term (hourly or daily) ambient noise levels would be small. Therefore, short-term construction-related impacts associated with worker commute and equipment transport to the Project site would be less than significant.

The second type of short-term noise impact is related to noise generated during construction on the Project site. Construction is completed in discrete steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on the site and, therefore, the noise levels surrounding the site as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction related noise ranges to be categorized by work phase. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full-power operation followed by 3 or 4 minutes at lower power settings. Impact equipment such as pile drivers is not expected to be used during construction of this project.

The site preparation and grading phase of the Project is expected to require the use of rubber tired dozers, tractors, front-end loaders, backhoes, excavators, and pick-up trucks. The trail preparation and paving phase of construction is expected to require the use of pavers, rollers, and concrete mixers, tractors, front-end loaders, backhoes, and pick-up trucks. Typical maximum noise levels from these types of equipment range from 80 to 85 dBA L_{max} at a distance of 50 feet when the equipment operate at full power.

The nearest off-site receptor to areas where multiple pieces of construction equipment could operate simultaneously are the residential land uses located west of the Project alignment. The closest façades located approximately 40 feet from the construction footprint. At this distance, construction noise levels could range up to approximately 86 dBA L_{max} during the loudest phase of construction. However, these maximum noise levels would be temporary and sporadic as they would only occur when equipment operate at maximum power at the nearest location to these closest receptors. Noise levels would be noticeably lower as equipment spreads out over the Project site and operates further away from nearby residential land uses.

Chapter 6.70, Sound Pressure Levels of the Anaheim Municipal Code limits sound levels for stationary sources of noise radiated for extended periods from any premises in excess of 60 dB at the property line. However, sound created by construction within the City is exempt from the requirements of the Municipal Code if it is conducted from 7:00 a.m. to 7:00 p.m. Therefore, implementation of Mitigation Measure NOI-1, including restrictions on permissible hours of noise producing construction activities, would reduce construction noise impacts to less than significant.

Mitigation Measure

MM NOI-1 Implementation of the following multi-part mitigation measure is required to reduce potential construction period noise impacts:

- The construction contractor shall ensure that all equipment driven by internal combustion engines shall be equipped with mufflers and intake silencers no less effective than originally equipped.
- At all times during project grading and construction, the construction contractor shall ensure that stationary noise-generating equipment shall be located as far as practicable from sensitive receptors and placed so that emitted noise is directed away from adjacent residences.
- The project contractor shall utilize portable noise barriers anytime "heavy" construction equipment (typically defined as greater than 250 horse power) operates within 100 feet of existing residences.
- The construction contractor shall limit all noise producing construction activities, including deliveries and warming up of equipment, to the hours of 7:00 a.m. to 7:00 p.m., Monday through Friday.

Long-term Operational Impacts

The park will attract approximately 100 users to the site each day. Based on the traffic impact analysis prepared for this project, half of these users will walk up to the site (each of the 40 homes adjacent to the site have access through gates), or cycle to the site. The other half will drive and park.

The Proposed Project would include new stationary noise sources, such as increased parking lot activities at the existing Lincoln Avenue parking area. Typical parking lot activities such as people conversing, doors slamming, or vehicles idling generate noise levels of approximately 60 dBA to 70 dBA L_{max} at 50 feet. These activities are expected to occur sporadically throughout the day, as visitors and staff arrive and leave the parking lot areas. Although there would be occasional high single-event noise exposure of up to 70 dBA L_{max} at 50 feet from parking lot activities, such activities spread out over the Project site parking areas would not result in an increase above existing ambient noise levels at any nearby sensitive receptor. These noise levels would be similar to what is currently experienced in the vicinity of this parking area under existing conditions. In addition, these single-event maximum noise levels are not expected to occur for more than a cumulative one minute within any hour; and would therefore not exceed the applicable land use compatibility standard of 65 dBA CNEL for any nearby residential land use. In addition, project operational noise sources would not result in an exceedance of the City's noise performance standard of 60 dBA for any extended period of time as measured at any receiving property line. Therefore, project-related parking lot activities would not result in exposure of persons to noise levels in excess of existing noise levels nor result in noise levels that would exceed established standards.

A significant impact would also occur if the Project would result in increased traffic noise levels as measured at noise-sensitive land uses. The proposed park is anticipated to generate a total of 228

trips per day with approximately 9 AM peak-hour trips and 18 PM peak-hour trips. As further discussed under impact analysis Section 12c), this small incremental increase in traffic along roadways in the Project vicinity would not result in a perceptible increase in traffic noise levels. Therefore, the Proposed Project would result in less than significant traffic noise impacts in the Project vicinity.

Operation of the Proposed Project would involve the increased use of the trail by recreationists. Noise associated with recreationists such as hikers and bicyclists is relatively minimal and may include the intermittent raising of voices as they pass by existing receptor locations along the trail. Typical noise levels for an adult shouting can range from 82 dBA to 88 dBA L_{max}, as measured at 3 feet.[4] Typical sound levels of adults using a loud voice range from 71 dBA to 75 dBA L_{max} as measured at 3 feet. The nearest portion of the bike trail would be located approximately 25 feet from nearby sensitive receptor outdoor active use areas (such as residential backyards). At this distance, maximum noise levels from an adult shouting would attenuate to below 69.5 dBA L_{max}; and noise levels from an adult using a loud voice would attenuate to below 56.5 dBA L_{max}. These maximum noise levels would occur for only a few seconds when a recreationist rides their bike or walks by. In addition, these noise levels are below existing maximum noise levels experienced in the Project vicinity, as documented in the noise monitoring effort (see Table 13: Noise Monitoring Summary). Therefore, while the characteristic of the noise source may be different (human voice versus traffic or mechanical stationary noise sources) the recreational use of the proposed trail would not result in a permanent increase in ambient noise levels as measured at nearby sensitive receptor land uses.

On the basis of short-term noise level estimates, the Project would result in potentially significant impacts unless mitigation is incorporated. The project would not result long-term noise levels that exceed City of Anaheim transportation or stationary noise standards. Therefore, long-term impacts would be less than significant.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less than significant impact. Groundborne vibrations consist of rapidly fluctuating motions within the ground that have an average motion of zero. Vibrating objects in contact with the ground radiate vibration waves through various soil and rock strata to the foundations of nearby buildings.

In extreme cases, excessive groundborne vibration has the potential to cause structural damage to buildings. Common sources of groundborne vibration include construction activities such as operating heavy earthmoving equipment. Construction vibration impacts on building structures are generally assessed in terms of peak particle velocity (PPV). Typical vibration source levels from construction equipment are shown in Table 14: Vibration Levels of Construction Equipment.

[4] Levitt, Harry and John C. Webster, 1991. *Handbook of Acoustical Measurements and Noise Control* (Third Edition, edited by Cyril M Harris).

Table 14: Vibration Levels of Construction Equipment

Construction Equipment	PPV at 25 Feet (inches/second)	RMS Velocity in Decibels (VdB) at 25 Feet
Water Trucks	0.001	57
Scraper	0.002	58
Bulldozer-small	0.003	58
Jackhammer	0.035	79
Concrete Mixer	0.046	81
Concrete Pump	0.046	81
Paver	0.046	81
Pickup Truck	0.046	81
Auger Drill Rig	0.051	82
Backhoe	0.051	82
Crane (Mobile)	0.051	82
Excavator	0.051	82
Grader	0.051	82
Loader	0.051	82
Loaded Trucks	0.076	86
Bulldozer-Large	0.089	87
Caisson drilling	0.089	87
Vibratory Roller (small)	0.101	88
Compactor	0.138	90
Clam shovel drop	0.202	94
Vibratory Roller (large)	0.210	94
Pile Driver(impact-typical)	0.644	104
Pile Driver (impact-upper range)	1.518	112
Source: Compilation of scientific and academic literature, generated by FTA and FHWA.		

Propagation of vibration through soil can be calculated using the vibration reference equation of

PPV = PPV ref * (25/D)^n (in/sec)

Where:

PPV = reference measurement at 25 feet from vibration source
D = distance from equipment to property line
N = vibration attenuation rate through ground

According to Chapter 12 of the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment manual (2006), an "n" value of 1.5 is recommended to calculate vibration propagation through typical soil conditions.

The FTA has established industry accepted standards for vibration impact criteria and impact assessment. These guidelines are published in its Transit Noise and Vibration Impact Assessment document (FTA 2006). The FTA guidelines include thresholds for construction vibration impacts for various structural categories as shown in Table 15: Federal Transit Administration Construction Vibration Impact Criteria.

Table 15: Federal Transit Administration Construction Vibration Impact Criteria

Building Category	PPV (in/sec)	Approximate VdB
I. Reinforced-Concrete, Steel or Timber (no plaster)	0.5	102
II. Engineered Concrete and Masonry (no plaster)	0.3	98
III. Non Engineered Timber and Masonry Buildings	0.2	94
IV. Buildings Extremely Susceptible to Vibration Damage	0.12	90
Note: VdB = Velocity in Decibels Source: FTA, 2006.		

Of the variety of equipment used during construction, the small vibratory rollers that are anticipated to be used in the site preparation phase of construction would produce the greatest groundborne vibration levels. Impact equipment such as pile drivers is not expected to be used during construction of this project. Small vibratory rollers produce groundborne vibration levels ranging up to 0.101 inch per second (in/sec) peak particle velocity (PPV) at 25 feet from the operating equipment.

Based on the tentative site plan available at the time of this analysis, the nearest off-site structure to the proposed construction areas where heavy construction equipment would operate would be the multi-family residential structures located at 3050 E. Frontera Street. The nearest façade of this land use would be located a minimum of 20 feet from the construction footprint where small vibratory roller equipment would operate during construction of the Proposed Project. At this distance groundborne vibration levels could range up to 0.141 PPV from operation of a small vibratory roller. This is below the industry standard vibration damage criteria of 0.2 PPV for non-engineered timber and masonry buildings (see Table 15: Federal Transit Administration Construction Vibration Impact Criteria). Therefore, construction-related groundborne vibration impacts would be considered less than significant.

Upon completion of construction, the Project would not include any permanent sources of groundborne vibration. As such, implementation of the Proposed Project would not expose persons within the Project vicinity to excessive groundborne vibration levels. Therefore, project-related groundborne vibration impacts would be considered less than significant.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less than significant impact. Audible increases in noise levels generally refer to a change of 3 dBA or more, as this level has been found to be barely perceptible to the human ear in outdoor environments. In general, a doubling of sound sources with equal strength is required to result in a 3 dBA increase in noise level. A change of 5 dBA is considered to be the minimum change considered readily perceptible to the human ear in outdoor environments. Therefore, for purposes of this analysis, an increase of 5 dBA or greater would be considered a substantial permanent increase in ambient noise levels.

Implementation of the Project would not result in a doubling of traffic volumes along any roadway segment in the Project vicinity. The Proposed Project is expected to generate a total of 228 trips per day with approximately 9 AM peak-hour trips and 18 PM peak-hour trips. This is well below half of the average daily trips on any of the local access roadway segments. Thus, implementation of the Project is not expected to result in even a perceptible increase (defined to be a 3-dBA or greater increase) in traffic noise levels on local roadways in the Project vicinity. Therefore, project-related traffic noise impacts to off-site receptors would be less than significant.

It is anticipated that noise generated from park patrons will be minimal along the proposed trail due to the passive recreational uses (hiking, cycling, walking, etc.) proposed and the fact that users would be traveling along the trail and not be stationary. As is noted in the impact discussion in Section 12a), above, noise levels from recreationists using the proposed trail would not result in a permanent increase in ambient noise levels as measured at nearby sensitive receptor land uses. In addition, the enforcement of the proposed park's rules and hours of access will be performed by the City of Anaheim Park Rangers and the Police Department. Enforcement of the hours of access will provide additional assurance that noise levels from operation of the proposed trail would not result in sleep disturbance of noise-sensitive receptors along the Project alignment.

Therefore, potential permanent operational noise increase impacts resulting from implementation of the Proposed Project would be less than significant.

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less than significant impact. As addressed in impact analysis Section 12a) project-related construction activities could result in potential single event noise exposure causing intermittent noise nuisance at the closest noise-sensitive land uses surrounding the Project site. However, the effect on longer term (hourly or daily) ambient noise levels would be small and would not be expected to result in a perceptible increase in ambient noise levels at off-site receptors in the Project vicinity. However, sound created by construction within the City is exempt from the requirements of the Municipal Code if it is conducted from 7:00 a.m. to 7:00 p.m. Therefore, since project construction activities would be conducted between 7:00 a.m. and 7:00 p.m., potential short-term construction noise impacts on sensitive receptors in the Project vicinity would be reduced to 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 expose people residing or working in the project area to excessive noise levels?

No impact. The Proposed Project site is not within an airport land use plan and therefore, will not expose people residing/working in the area to excessive noise levels.

f) For a project within the vicinity of a private airstrip, would the Project expose people residing or working in area to excessive noise levels?

No impact. The Proposed Project site is not in the vicinity of any private or public airstrip, heliport, or helistop and therefore, will not expose people residing/working in the area to excessive noise levels.

3.13 - Population and Housing

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.13 Population and Housing *Would the project:*				
a) Induce substantial 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 housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Environmental Evaluation

Would the project:

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

No impact. The project does not involve the removal of existing homes or the construction of new homes. The Proposed Project will serve as a trail connector to the existing Santa Ana Class I bike path, and as a walk-up neighborhood recreation destination. The Proposed Project would not indirectly induce population growth in the area, since it is intended to function as a resource for existing trails and neighborhoods. There would be no direct or indirect impact.

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

No impact. The Proposed Project will not displace housing. There would be no impact.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No impact. The Proposed Project will not displace people. There would be no impact.

3.14 - Public Services

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.14 Public Services *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:*				
a) Fire protection?	☐	☐	☐	☒
b) Police protection?	☐	☐	☐	☒
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☐	☒
e) Other public facilities?	☐	☐	☐	☒

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

a) Fire protection?

No impact. The Proposed Project provides recreational facilities. Should fire protection services be needed in response to an emergency, it will be provided to the Project site by the local Anaheim Fire Department. According to the City of Anaheim Fire Department, the Operation Division employs seven Battalion Chiefs, 200 Suppression Personnel, a Registered Nurse Emergency a Medical Coordinator, one part-time nurse EMS Educator, and support staff. The Fire Suppression Section of the Operation Division handles approximately 30,000 emergency incidents a year to include fire, rescue, medical aid, and other calls for service with 10 engine companies and six truck companies in 11 fire stations (Anaheim Fire Department 2015).

The Proposed Project would be adequately served by existing fire department facilities and personnel. As such, the Proposed Project would not require the provision of new or altered fire department facilities.

b) Police protection?

No impact. The Anaheim Police Department (APD) currently employs approximately 370 sworn officers, a support staff of over 195, and a Reserve Officer Detail of 36. The ratio of sworn police officers is approximately 1.13 officers per 1,000 population. The approximate average response time

of patrol units to Priority 1 emergency calls throughout the jurisdiction is an average of 6.1 minutes. The response times for non-emergency Priority 2 and Priority 3 calls are an average of 8.5 minutes and 19.2 minutes, respectively.

As previously discussed, park security will be provided by City of Anaheim Park Rangers and the Anaheim Police Department. Park security will patrol the park Monday through Friday 1:30 p.m. to 10:30 p.m., and on Saturday and Sunday from 9:30 a.m. to 10:30 p.m. A Park Ranger will conduct a driving patrol of the accessible interior of the facility, with occasional foot patrol to inspect fencing and the facilities in general. Generally, patrols vary according to specific route and schedule, with rangers stopping periodically at points offering an overview of the patrol area. The 45- to 60-minute patrols of the Park would alternate with patrols of nearby city facilities such as Juarez and Rio Vista Parks. A full description of the Project's long-term operation and maintenance plan is contained in Appendix A, *City of Anaheim Community Services Department Anaheim Coves Operation and Maintenance Plan*, December 14, 2016.

Since patrols will be conducted by Park Rangers, park security operations are not likely to result in an increased demand for APD service. Therefore, project implementation is not anticipated to increase police response times to the Project site or surrounding vicinity, or require construction of new or physically altered police protection facilities. Thus, the Project will result in no impact related to the provision of police services.

c) Schools?

No impact. A demand for schools will not be generated by the Proposed Project. The project will add a new recreational resource to an existing neighborhood. There would be no impact.

d) Parks?

No impact. The Proposed Project is a 9-acre urban nature park that will include a Class 1 bike path paved with permeable asphalt, a decomposed granite multi-use trail, and a demonstration garden/children's education/nature play area. The Proposed Project adds a recreational facility to an existing neighborhood and provides continuity in recreation between the Anaheim Coves Park and the Santa Ana River Trail. The Proposed Project serves to reduce impacts on other facilities by spreading out recreational use patterns. There would be no impact to parks.

e) Other public facilities?

No impact. No demand for other public facilities will be generated by the Proposed Project. The project will add a recreational resource to an existing neighborhood. There would be no impact.

3.15 - Recreation

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.15 Recreation				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
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?	☐	☐	☐	☒

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

No impact. The Proposed Project is a 9-acre urban nature park that will include a Class 1 bike path paved with permeable asphalt, a decomposed granite multi-use trail, and a demonstration garden/children's education/nature play area. The Proposed Project adds a recreational facility to an existing neighborhood and connects the Anaheim Five Coves (Northern Extension) to the Santa Ana River Trail (Class 1 bike path). The Proposed Project serves to reduce impacts on other facilities by spreading out recreational use patterns. The Proposed Project serves as a community recreation connector as it connects the Anaheim Five Coves (Northern Extension) to the Santa Ana River Trail. There will be no impact to parks.

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

No impact. Implementation of the Proposed Project will not require the construction or expansion of other recreational facilities. Therefore, the Project would result in no impacts on new or expanded recreational facilities.

3.16 - Transportation and Traffic

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.16 Transportation/Traffic *Would the project:*				
a) Cause an increase in traffic, which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	☐	☐	☒	☐
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☒	☐	☐
e) Result in inadequate emergency access?	☐	☐	☐	☒
f) Result in inadequate parking capacity?	☐	☐	☒	☐
g) Conflict with adopted policies, plans or programs supporting alternative transportation (e.g. bus turnouts, bicycle racks)?	☐	☐	☐	☒

A traffic evaluation for the Proposed Project was prepared by Urban Crossroads in February 2016. The traffic evaluation for this project is located in Appendix H, *The Coves Northern Extension Focused Trip Generation Assessment*, Urban Crossroads, February 23, 2016. The following describes the existing traffic conditions relating to the Proposed Project and the surrounding area.

Existing Conditions

The project site currently exists along a dirt access road operated and maintained by the OCWD along the Five Coves groundwater recharge basins. The majority of the Project site is vacant and bare, with some native and non-native ruderal vegetation.

The proposed Anaheim Coves, Northern Extension Project consists of an 9 acre linear urban nature park with a 0.9-mile Class 1, permeable asphalt bicycle path and decomposed granite multi-use trail, and a 0.75-acre demonstration garden/children's education/nature play area with nature-based amenities. The Class 1 bike path will accommodate recreational and commuter bicyclists. The multi-use trail will accommodate pedestrian, cycle, and equestrian use.

The Proposed Project is the northern extension of the Anaheim Five Coves (Northern Extension). Additional parking for the site is available at the Ball Road restroom (part of Phase I), along the park frontage on Rio Vista Street, at the northern end of the Lincoln Avenue restroom, and near the two neighborhood entrances located at Armando Street.

The Proposed Project connects to the Anaheim Five Coves (Northern Extension) through the OCWD's service road, which utilizes the Lincoln Avenue underpass tunnel to connect the trail segments together. This acts as a connector to the greater Santa Ana River Trail (SART) system, which provides segments of trail, including Class 1 and Class II bikeways, along the Santa Ana River from the San Bernardino Mountains to the Pacific Ocean. Once completed, the Proposed Project will be open to the public on a daily basis. As a connector to the Class 1 SART system, the trail will be open for 24 hours per day, 7 days per week basis for commuter access.

Environmental Evaluation

Would the project:

a) Cause an increase in traffic, which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?

Less than significant impact. Following is an evaluation of the potential short-term (construction) and long-term (operational) impacts associated with the implementation of the Proposed Project.

Short-term (Construction Activity)

Project construction activities may potentially result in temporary and transient traffic deficiencies related to:

- Export of soil
- Import of construction materials/heavy equipment
- Construction employee trips

The project will result in trips related to construction vehicles and employees entering and exiting the Project site. The number of combined construction equipment and construction worker vehicles will range from 10 to 20 vehicles. During mobilization and demobilization of construction equipment, access to the site will be from the access gates off of Lincoln Avenue and Frontera Avenue. Construction operating hours will occur between 7:00 a.m. and 5:00 p.m., Monday through

Friday. The project proposes a 6-month construction duration, consisting of activities such as demolition, mass grading, paving, and landscaping activities.

In accordance with the requirement of the City of Anaheim, all export truck activities will occur between the hours of 9:00 a.m. and 3:00 p.m. As such, construction traffic during the typical peak hours of adjacent street traffic is expected to contribute a less than significant amount of traffic (fewer than 51 peak-hour trips) to any study area intersection.

The mass grading phase will last approximately one month (22 work days). Based on consultation with the client, a maximum of 2,000 cubic yards of soil export is expected. As such, approximately 90 cubic yards of soil will be exported per day. Based on the assumption that a haul truck has a load capacity of 16 cubic yards, there will be approximately six loaded haul trucks per day (CalEEMod 2013). CalEEMod assumes a truck exporting material from the Project site will have an arrival trip with an empty truck. As such, the amount of truck trips are doubled to account for a round trip. Therefore, the Project will result in 12 (two-way) haul truck trips.

To represent the impact of the large haul trucks, the trucks are converted into passenger car equivalents (PCE). By their size alone, these vehicles occupy the same space as two or more passenger cars. In addition, the time it takes for these vehicles to accelerate and slow down is also much longer than for passenger cars, and varies depending on the type of vehicle and number of axles. For the purposes of this analysis, a PCE factor of 3.0 is applied to haul trucks. As such, the 12 (two-way) haul truck trips is converted to a total of 36 (two-way) PCE trips per day.

Heavy equipment will be involved during 4 months of the construction duration, with the remaining 2 months of construction involving installation of native plantings.

Heavy equipment will be delivered and removed from the site throughout the construction phase. As most heavy equipment is typically not an authorized vehicle to be driven on a public roadway, most of the equipment will be delivered and removed from the site via large flatbed trucks. It is anticipated that delivery of heavy equipment would not occur on a daily basis, but rather periodically throughout the construction phase based on need. As such, no trips are counted for the import of construction materials and heavy equipment.

It is anticipated that the majority of employees would arrive and depart from the site adjacent to the peak commute traffic periods (weekdays from 7:00 a.m. to 9:00 a.m. and 4:00 p.m.to 6:00 p.m.) with a period of overlap. Each employee is assumed to drive to and from the construction site alone each day. It has been assumed that employees will arrive up to 30 minutes prior to the workday and will leave up to 30 minutes after the workday ends. Parking for employees and non-employee vehicles will be accommodated within the Project staging area, which includes equipment staging. The project staging area is proposed to be located in the area that will become the demonstration garden/children's education/nature play area.

Estimates of employee trips are based on the number of employees estimated to be on-site throughout the various stages of construction. According to CalEEMod, the number of workers is 1.25 times the number of pieces of equipment for all phases except building construction and

architectural coating. Based on construction information provided by the client, the Project will include seven pieces of equipment. As such, nine construction workers are expected to be on-site throughout various stages of construction. Therefore, 18 daily employee trips (to account for employees entering and exiting the Project site) are expected.

The project's construction activity is anticipated to generate 36 PCE daily trips for export of soil and 18 daily trips for employee commuter trips, for a combined total of 54 daily trips. The City of Anaheim Criteria for Preparation of Traffic Impact Studies (referred to as CACPTIS) indicates that written analysis will be required if trip generation is expected to exceed 100 peak-hour vehicle trips (or 51 vehicle trips at a CMP intersection), or for an increase of 2,400 vehicles per day (1,600 vehicles per day on the CMP highway system).

This project's total daily trips are less than the 2,400 daily trips criteria established by the CACPTIS. Furthermore, the Project's construction activity will result in approximately 9 peak-hour trips (due to construction worker commutes), which is less than the 51 peak-hour trips at an intersection criteria established by the CACPTIS. As such, construction traffic for daily and typical peak hours of adjacent street traffic is expected to contribute a less than significant amount of traffic (less than both 2,400 daily and 50 peak-hour trips) to any study area intersection and no further analysis is required. Therefore, project construction traffic is considered less than significant.

Long-term (Operational)

The project is anticipated to generate a total of 228 trips per day with approximately 9 AM peak-hour trips and 18 PM peak-hour trips. As such, ongoing traffic for daily and typical peak hours of adjacent street traffic is expected to contribute a less than significant amount of traffic (fewer than 2,400 daily and 50 peak-hour trips) to any study area intersection, and no further analysis is required.

As such, traffic related to construction activity and ongoing park activities does not meet the minimum criteria for a Traffic Impact Study for either daily or peak-hour trip generation. Therefore, the increase in traffic related to the Project is less than significant, according to the CACPTIS. As such, additional analysis is not required. Thus, the Proposed Project would result in a less than significant impact related to increases in traffic on the surrounding street system.

b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?

Less than significant impact. Orange County CMP Traffic Impact Analysis methodology states, "project impacts of three percent or less can be mitigated by impact fees or other revenues. Projects with a potential to create an impact of more than three percent of Level of Service E capacity will require TIA's. On this basis, it is recommended that all development projects that generate more than 2,400 daily trips be subject to a TIA for CMP evaluation. For projects which will directly access or be in close proximity to a CMP Highway System link a reduced threshold of 1,600 trips/day would be appropriate."

The Proposed Project is anticipated to generate 228 trip-ends per day, of which 9 trips occur during the AM peak hour and 18 trips occur during the PM peak hour. Therefore, the Proposed Project's contribution to CMP roadways and intersection is expected to be less than the 3 percent threshold and is not considered significant.

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No impact. The Proposed Project does not include any facilities that would impact air traffic patterns. The nearest airport to the Project site is the Fullerton Municipal Airport, which is located approximately 7 miles to the northwest.

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

Less than significant impact with mitigation incorporated. Two primary safety issues areas associated with the operation of the Proposed Project. The first issue is that while the park will not be in use during construction activities, operationally, there is the potential for conflict between OCWD maintenance vehicles and park users, including pedestrians, bicyclists, and equestrians, once the park is completed. The second issue is the potential for interactions between OCWD maintenance vehicles in the Lincoln Avenue underpass tunnel. Therefore, impacts are potentially significant before mitigation. To reduce potential safety issues, the following mitigation measures are recommended to alert both trail users and maintenance vehicle operators to the potential hazards existing on-site. Mitigation Measure TRANS-2 will serve to restrict the use of the Lincoln Avenue tunnel to only one type of user at a time.

MM TRANS-1 Installation of signage along the trail/bike areas to minimize any potential issues between motorized and non-motorized park users.

Prior to operation of the park, signage shall be installed in the trail entry areas in the vicinity of the park entrances on Lincoln Avenue, Armando Street, Frontera Street, and on each of the tunnel entrances. Appropriate signage will help to ensure that all potential users of the park facilities are aware that maintenance activities and vehicles may be encountered within the park. Signage will be subject to OCWD approval prior to the operation of the park. The signs shall also notify maintenance vehicle operators that the area is in use by pedestrians, bicyclists, and equestrians. The signs should consist of four (4) regulatory/warning signs to:

- Caution park users to watch for maintenance vehicles
- Prohibit motorized vehicles (except for maintenance vehicles) to access the trail/bikeway area
- Indicate hierarchy of "trail courtesy"
- Identify the trail/bikeway

MM TRANS-2 Installation of signage, lighting, and a traffic signal in the Lincoln Avenue underpass tunnel to minimize any potential issues between motorized and non-motorized park users.

Prior to operation of the park, signage shall be installed at both ends of the trail, as described in MM TRANS-1. Appropriate signage will help to ensure that all potential users of the park facilities are aware that maintenance activities and vehicles may be encountered within the park. The signs shall also notify maintenance vehicle operators that the area is in use by pedestrians, bicyclists, and equestrians. Additionally, lighting will be installed in the tunnel to provide illumination at night. A traffic signal that can be operated with the push of a button will either indicate "stop" or "go" in order to allow only pedestrians, bicyclists, and equestrians or maintenance vehicles in the tunnel at one time. Signage and improvements are subject to OCWD approval prior to the operation of the park.

e) Result in inadequate emergency access?

No impact. This facility will continue to be accessible to all emergency vehicles and there will be no change to existing access.

f) Result in inadequate parking capacity?

Less than significant impact. The Proposed Project will use the existing 14-space parking lot and restroom facility at the Lincoln Avenue (southern) end of the park. Additional parking for the site is available at the Ball Road restroom (part of Phase I), along the park frontage on Rio Vista Street, at the northern end of the Lincoln Avenue restroom, and near the two neighborhood entrances located at Armando Street. Based on the Project's trip generation, there will be adequate parking for the nature park the during peak and off-peak hours, and impacts would be less than significant.

g) Conflict with adopted policies, plans or programs supporting alternative transportation (e.g. bus turnouts, bicycle racks)?

No impact. The project will not hinder alternative transportation policies/programs because the Project will not remove alternative transportation facilities. The project is intended to encourage alternative sources of transportation in the area, including walking and biking. There would be no impact.

3.17 - Tribal Cultural Resources

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
4.18 Tribal Cultural Resources *Would the project:*				
Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) 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	☐	☐	☐	☒
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section §5024.1.	☐	☒	☐	☐

Tribal Cultural Resources

Effective July 1, 2015, Assembly Bill 52 requires meaningful consultation with California Native American Tribes on potential impacts to Tribal Cultural Resources, as defined in Section 21074. A tribe must submit a written request to the relevant lead agency if it wishes to be notified of proposed projects within its traditionally and culturally affiliated area. The lead agency must provide written, formal notification to the tribes that have requested it within 14 days of determining that a project application is complete, or deciding to undertake a project. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. Consultation concludes when either (1) the parties agree to mitigation measures to avoid a significant effect, if one exists, on a tribal cultural resource, or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. AB 52 also addresses confidentiality during tribal consultation per Public Resources Code Section 21082.3(c). The City of Anaheim has received requests from three California Native American Tribes to be notified of projects in which the City of Anaheim is the Lead Agency under CEQA

Copies of correspondences sent as part of AB 52 consultations can be found in Appendix C.3, *Tribal Cultural Resources Response Letters*.

Environmental Evaluation

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

Would the project:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources?

No impact. In order to determine the presence or absence of recorded tribal cultural resources within the Proposed Project site, on October 15, 2015, FCS conducted a record search at the California Historical Resources Information System (CHRIS) Eastern Information Center (EIC) located at the University of California, Riverside. The current inventories of the National Register of Historic Places, the CR, the California Historical Landmarks list, the California Points of Historical Interest list, the California State Historic Resources Inventory for Orange County were reviewed to determine the existence of previously documented tribal cultural resources. Three prehistoric resources of potential tribal cultural significance are located approximately 0.5 miles beyond the Project site, however these will remain unaffected by the Proposed Project. No additional resources of potential tribal cultural value have been recorded within or adjacent to the project site. There would be no impact.

b) Cause a substantial adverse change in the significance of a tribal cultural resource determined by the lead agency to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section §5024.1?

Less than significant impact with mitigation incorporated. FCS assisted the City of Anaheim with AB 52 consultation by drafting the initial consultation invitation letters and assisting with any subsequent responses or requests. The City of Anaheim provided a list of three Native American individuals or organizations that have requested to be consulted under AB 52 during new project development. FCS drafted the initial consultation invitations on City of Anaheim letterhead and received City approval before proceeding. Contact information for both FCS and the City of Anaheim were included in these letters so that any interested parties could respond to either or both organizations.

On July 11, 2016, FCS mailed the approved consultation invitation letters to the three Native American individuals or organizations listed by the City of Anaheim. An additional outreach attempt was conducted on July 20, 2016, through a subsequent mailing of the same outreach letters. A final round of phone calls or emails were made to each of the three listed individual or organization on July 25, 2016. As of 30 days from the final outreach attempt, only two responses have been received by either FCS or the City of Anaheim.

Joyce Stanfield Perry of the Juaneño Band of Mission Indians, Acjachemen Nation responded via email that the Tribe has no concerns regarding the Anaheim Five Coves Project at this time, but that they would like to be notified if any cultural resource deposits are unearthed during development. Andrew Salas of the Gabrieleno Band of Mission Indians—Kizh Nation responded the Project site is within the ancestral and traditional territories of the Kizh villages and therefore he requests that one of his tribe's Native American monitors and an archaeological monitor be on-site during all ground disturbances during project development. The City followed up with an invitation to join a site visit on October 13, 2016 with no response from the Tribe. Potential impacts to Tribal Cultural Resources would be less than significant with implementation of MM TRIBAL-1.

Mitigation Measures

MM TRIBAL-1 Prior to issuance of a grading permit, The Property Owner/Developer shall provide grading plans to the designated representative of the Gabrieleno Band of Mission Indians—Kizh Nation for review. If the Gabrieleno Band of Mission Indians—Kizh Nation determines upon review of the grading plans that they would like to have a monitor present during ground-disturbing activities for the project, appropriate scheduling and accommodation would be made for a qualified tribal monitor from the Gabrieleno Band of Mission Indians—Kizh Nation to monitor the site and work cooperatively with the project archaeologist during ground-disturbing activities to identify and protect any potential tribal cultural resources discovered on-site.

3.18 - Utilities and Service Systems

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.17 Utilities and Service Systems *Would the project:*				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐

Environmental Evaluation

Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

No impact. The RWQCB, Santa Ana Region, issued an NPDES permit, which includes the City as a Permittee. That NPDES permit implements federal and state law governing point source discharges (a municipal or industrial discharge at a specific location or pipe) and nonpoint source discharges

(diffuse runoff of water from adjacent land uses) to surface waters of the United States. Implementation of the Project would not increase wastewater generation, thus, it would not increase the demand for wastewater treatment; as discussed in impact discussion Section 17b). Therefore, given the nature and scope of the Project, project implementation would not cause an exceedance of wastewater treatment requirements of the applicable RWQCB, and there would be no impact.

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

No impact. The Proposed Project would use water for dust abatement during construction, and drip irrigation for the watering of native plant species during the operation of the Project. The project's ongoing operations would not generate wastewater or require the construction of new water or wastewater treatment facilities because of the nominal demand for water and because no wastewater would be generated. The Proposed Project does not include restroom facilities. Project improvements to provide limited irrigation water to the site will connect to the City's existing water supply system. The Proposed Project will incorporate native plant species and drought tolerant plants that will require a minimal amount of irrigation on a temporary basis until plantings are established. All improvements will be designed in accordance with the requirements and standards of the City of Anaheim. Implementation of the Proposed Project would result in no impact with regard to new water or wastewater treatment facilities.

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less than significant impact. The Proposed Project includes a bio-swale running along the length of the trail on the west side to increase stormwater infiltration on-site. All trail surfaces added to the site will be permeable to allow for stormwater infiltration. Surface water will either percolate into the ground or be diverted to the bio-swale. The bio-swale will be designed to convey stormwater to the existing on-site culverts. Additionally, the trail will be constructed of surfaces that allow water to percolate into the ground, reducing surface water runoff on-site. No new stormwater lines or expansion of existing storm facilities will be required with project implementation. Impacts will be less than significant.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less than significant impact. As discussed in impact discussion 17 b) the Proposed Project would nominally increase the demand of water on the site as a result of irrigation of the proposed landscaping. However, the Proposed Project would not significantly increase demand for water. The impact would be less than significant.

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

No impact. As discussed in impact discussion 17a) and 17b) above, the Project would not increase wastewater flow. The project would result in no impact on existing wastewater services.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less than significant impact. The project would increase the demand on regional landfills in proportion to the amount of waste that would be generated from trash being placed in trash bins throughout the planned passive recreation/nature park. The long-term operation of the Proposed Project is not expected to significantly increase the demand for solid waste disposal. Capacity in destination landfills has been planned to accommodate disposal needs resulting from growth anticipated in the area. Source reduction and recycling are mandated by state regulations, which would contribute to a reduction in impacts regarding solid waste disposal. Implementation of the Proposed Project is not expected to result in adverse impacts on the capacity of solid waste disposal facilities serving the Project site. This impact would be less than significant.

g) Comply with federal, state, and local statutes and regulations related to solid waste?

Less than significant impact. Implementation of the Proposed Project is not expected to result in adverse impacts on the capacity of solid waste disposal facilities serving the Project site. Solid waste generated by public parks are typically in compliance with federal, state, and local statutes and regulations. This impact is considered to be less than significant.

3.19 - Mandatory Findings of Significance

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.18 Mandatory Findings of Significance				
a) Does the project have the potential to 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, 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?	☐	☐	☒	☐

Environmental Evaluation

Would the project:

a) Does the project have the potential to 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, 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. Implementation of the Proposed Project would not impact vegetation that supports special status fish or wildlife species that have the potential to occur on or adjacent to the Project site. The Proposed Project will not remove any vegetation in or near the shoreline. Project specific mitigation measures have also been identified to minimize construction-related impacts to sensitive plant and animal habitat and species below a level of significance. Potential impacts to sensitive species population would be less than significant

and would not cause species population to drop below self-sustaining levels. Cultural resource record searches have determined that there are no known significant cultural resources on the Project site. However, previous records do indicate that there is a potential for unknown cultural resources to occur on or near the Project site. Mitigation measures have been incorporated into the Proposed Project to reduce potential impacts to a less than significant level. No additional mitigation measures are required.

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

Less than significant impact. Implementation of the Proposed Project would not result in significant cumulative impacts with the proposed mitigation measures contained within the MND. The Proposed Project will comply with local and regional planning programs, applicable codes and ordinances, state and federal laws and regulations and project specific mitigation measures. Compliance with these programs will reduce the Project incremental contributions to cumulative impacts to a less than significant level. No additional mitigation measures are required.

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

Less than significant impact. The Proposed Project would not have any substantial effects on human beings. The Proposed Project will comply with local and regional planning programs, applicable codes and ordinances, state and federal laws and regulations and project specific mitigation measures to ensure that long-term operational activities and short-term construction activities of the Project will not result in direct or indirect adverse impacts to human beings. No additional mitigation measures are required.

Fish and Game Determination

Pursuant to Section 21089(b) of the Public Resources Code, all project applicants and public agencies subject to the California Environmental Quality Act shall pay a Fish and Game filing fee for each Proposed Project that would adversely affect wildlife resources.[5]

Has the presumption of adverse effect set forth in 14 CCR 753.5 (d) been rebutted by substantial evidence?

☐ Yes (Certificate of Fee Exemption and County Administrative fee required)

☒ No (Pay fee)

[5] Fish and Game Code Section 711.4(c)(2)(A) states that projects that are Categorically Exempt from CEQA are also exempt from filing fee.

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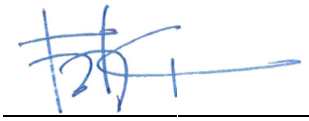
SECTION 4: CONSULTANT RECOMMENDATION

Based on the information and environmental analysis contained in this Initial Study, we recommend that the City of Anaheim prepare a Mitigated Negative Declaration for the Anaheim Five Coves (Northern Extension) Park Project. We find that the Project could have a significant effect on a number of environmental issues, but that the specified mitigation measures would reduce such impacts to a less than significant level. We recommend that the second category, which specifies preparation of a Mitigated Negative Declaration, be selected for the City's determination; refer to Section 3.3, Lead Agency Determination.

Date: December 21, 2016 Signed: 

Frank Coyle, Project Director
FirstCarbon Solutions
Environmental Services

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