

June 2017 | Addendum No. 2 to General Plan and Zoning Code Update
EIR No. 330
and
Housing Opportunities Sites Rezoning Project EIR No. 346

Olson East Street Townhomes Project

DEV2016-00138

Prepared for:

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1. Introduction

The Olson Company (Applicant) proposes to demolish two commercial buildings at 633 and 711 South East Street (Project Site) in the City of Anaheim and construct the proposed Olson East Street Townhomes Project (Proposed Project), consisting of 42 for-sale two- and three-bedroom condominiums in three-story buildings. Each unit would include a two-car garage, centralized courtyards; and private decks and patios. Open space would include a passive shaded open space area in the western portion of the site.

The 1.8-acre Project Site is currently designated for Low-Medium Density land use by the General Plan and is within the Industrial (I) and Residential Opportunity (RO) Overlay Zone. The Proposed Project would be developed in accordance with the RO Overlay Zone, which allows housing development opportunities consistent with a property's General Plan land use designation. The Proposed Project includes a General Plan Amendment (GPA2016-00512) to change the General Plan land use designation from the current Low-Medium Density to Medium Density Residential. The Low-Medium Density Residential land use designation allows development of up to 18 dwelling units per acre on the site; the proposed Medium Density Residential land use designation would allow up to 36 dwelling units per acre. The Proposed Project would be developed at a density of 23.3 dwelling units per acre. Additional discretionary actions associated with the Proposed Project include approval of a Conditional Use Permit (CUP2016-05902) to allow a Planned Unit Development and a Tentative Tract Map (SUBTM18088) to create one lot, 42-unit residential subdivision for condominium purposes.

In May 2004, the City of Anaheim certified the General Plan and Zoning Code Update Program EIR No. 330 (EIR No. 330). EIR No. 330 evaluated impacts associated with implementation of the Anaheim General Plan and Zoning Code Update (Update Project) and created a Mitigation Monitoring Program No. 122 to mitigate those impacts. The Project Site was designated for Low-Medium Density Residential land use as a part of this project.

In September 2013, the City of Anaheim certified Supplemental Environmental Impact Report No. 346 (SEIR No. 346) for the Anaheim Housing Opportunities Site Rezoning Project (Rezoning Project). The City approved Mitigation Monitoring Program No. 122A as part of SEIR No. 346. SEIR No. 346 supplemented EIR No. 330 in the areas of air quality, greenhouse gas emissions, noise, and transportation and traffic.

The Rezoning Project implemented a key strategy of the City's 2006-2014 General Plan Housing Element by rezoning the properties identified as Housing Opportunities Sites in the Housing Element. The proposed rezoning of these approximately 166 sites allowed "by-right" housing development at these locations by applying one of two overlay zones to these properties: the RO Overlay Zone or the Mixed Use (MU) Overlay Zone. The Project Site was reclassified to the RO Overlay Zone as a part of the Rezoning Project.

1. Introduction

This document is an Addendum to both EIR No. 330 and SEIR No. 346. The City of Anaheim is the lead agency responsible for EIR No. 330, SEIR No. 346, and this Addendum for the proposed Olson East Street Townhomes Project.

1.1 PURPOSE OF ADDENDUM

1.1.1 CEQA Requirements

According to Section 21166 of CEQA and Section 15162 of the State CEQA Guidelines, when an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR or negative declaration shall be prepared for the project unless the lead agency determines that one or more of the following conditions are met:

1. Substantial project changes are proposed that will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes would occur with respect to the circumstances under which the project is undertaken that require major revisions to the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified or the negative declaration was adopted shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration.
 - b. Significant effects previously examined will be substantially more severe than identified in the previous EIR.
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponent declines to adopt the mitigation measures or alternatives.
 - d. Mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponent declines to adopt the mitigation measures or alternatives.

Preparation of an Addendum to an EIR is appropriate when none of the conditions specified in Section 15162 (above) are present and some minor technical changes to the previously certified EIR are necessary.

1. Introduction

After careful consideration of the potential environmental impacts of the Proposed Project, the City of Anaheim has determined that 1) none of the conditions requiring preparation of a subsequent or supplement to an EIR have occurred, and 2) the circumstances described in Section 15164 of the CEQA Guidelines exist. Therefore, an Addendum to the EIR No. 330 and SEIR No. 346 has been deemed appropriate.

1.1.2 Scope of Analysis in This Addendum

In order to implement the Proposed Project, a number of discretionary approvals from the City of Anaheim are required, including a General Plan Amendment, Conditional Use Permit and a Tentative Tract Map and a Final Site Plan. As lead agency under CEQA, the City of Anaheim is required to evaluate the environmental impacts associated with these discretionary approvals. The scope of the review for project-related impacts for this Addendum is limited to changes between the Update and Rezoning Projects (Approved Project) and the Proposed Project. The previously certified EIR No. 330 and SEIR No. 346 (collectively referred to as the “Certified EIR”) and related approved mitigation for impacts associated with the Approved Project, therefore, effectively serve as the “baseline” for the environmental impact analysis. The baseline mitigation includes all applicable mitigation measures from Mitigation and Monitoring Program (MMP) No. 122 approved in conjunction with EIR No. 330 and from MMP No. 122A, approved in conjunction with SEIR No. 346. As required by CEQA, this Addendum also addresses changes in circumstances or new information that would potentially involve new environmental impacts.

1.2 CONTENT AND ORGANIZATION OF THIS ADDENDUM

This Addendum relies on the City of Anaheim’s CEQA checklist, which addresses environmental issues section by section. The completed checklist is included in Section 5.0, Environmental Analysis. Each environmental topic has the following subheadings:

- Summary of Previous Environmental Analysis (including EIR No. 330, SEIR No. 346, and previous CEQA documentation; see description under Subsection 3.1, *Project Background*, of this Addendum)
- Impacts Associated with the Proposed Project (including environmental checklist)
- Adopted Mitigation Measures Applicable to the Proposed Project

1.3 PREVIOUS ENVIRONMENTAL DOCUMENTATION

For a detailed description of adopted land use planning documents for the Update and Rezoning Projects and associated environmental documentation, see Section 3.1, *Project Background*, of this Addendum.

1. Introduction

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2. Environmental Setting

2.1 PROJECT LOCATION

2.1.1 City of Anaheim

As shown on Figure 1, the City of Anaheim is located in north Orange County, approximately 35 miles southeast of downtown Los Angeles. The Project Site is located in the City of Anaheim, about 0.8 miles east of the Anaheim Civic Center and 1.4 miles northeast of the Disneyland Resort. Regional access to the site is from the Interstate 5 (I-5) freeway via Ball Road (See Figure 1, *Regional Location*).

2.1.2 Project Site

As shown in Figures 2, *Local Vicinity*, and 3, *Aerial Photograph*, the 1.79-acre Project Site is on the west side of South East Street about 170 feet north of East South Street at 633 and 711 South East Street. The Project Site is one parcel, APN 037-130-21. Local access to the Project Site is provided via East and South streets. The project site is in Housing Opportunities Site 93 addressed by the aforementioned Rezoning Project.

2.2 ENVIRONMENTAL SETTING

2.2.1 Landform and Geography

The Project Site is relatively flat and at an elevation of about 166 feet above mean sea level; and is currently occupied by two commercial buildings. The site and surrounding areas have a west slope of about 0.4 percent.

2.2.2 Existing Land Use

The Project Site is currently occupied by two businesses; an auto auction company, Quartz Dealer Direct, at 633 South East Street, and a Digital Arts/Sign Company, McLogan Supply Company, at 711 South East Street. Each business occupies one building; the two buildings total approximately 12,000 square feet. Most of the site is paved surface parking used by the auto auction company. There is one metal freight container on the part of the site occupied by McLogan Supply Company (see Figure 3, *Aerial Photograph*, and 4, *Site Photographs*).

2.2.3 Surrounding Land Use

The project site is surrounded by industrial uses to the north; by a recycling facility to the west; by a gas station, industrial uses, and multi-family residential uses to the south; and by detached single-family residences

2. Environmental Setting

opposite East Street to the east (see Figure 3, *Aerial Photograph*). The LOSSAN corridor (Los Angeles to San Diego) railroad track passes about 810 feet west of the Project Site.¹

2.2.4 General Plan and Zoning

Anaheim General Plan

The General Plan land use designation for the Project Site is Low-Medium Density Residential. This designation is intended to provide for a wide range of residential land uses, including small-lot single-family residences, attached single-family residences, duplexes, townhomes, and mobile home parks. The Low-Medium Density Residential designation was applied to the Project Site as part of the aforementioned Update Project.

Zoning

The Project Site is within the Industrial (I) Zone and Residential Opportunity (RO) Overlay Zone. The Industrial Zone is intended to provide for and encourage the development of industrial uses and their related facilities, recognize the unique and valuable existing industrial land resources, and encourage industrial employment opportunities within the City. Targeted industries include research and development, repair services, wholesale activities, distribution centers, and manufacturing and fabrication (City of Anaheim Municipal Code Section 18.10.020). The RO Overlay Zone is intended to be applied to properties that are currently zoned and/or developed with non-residential uses but designated for multiple-family residential uses by the City's General Plan.

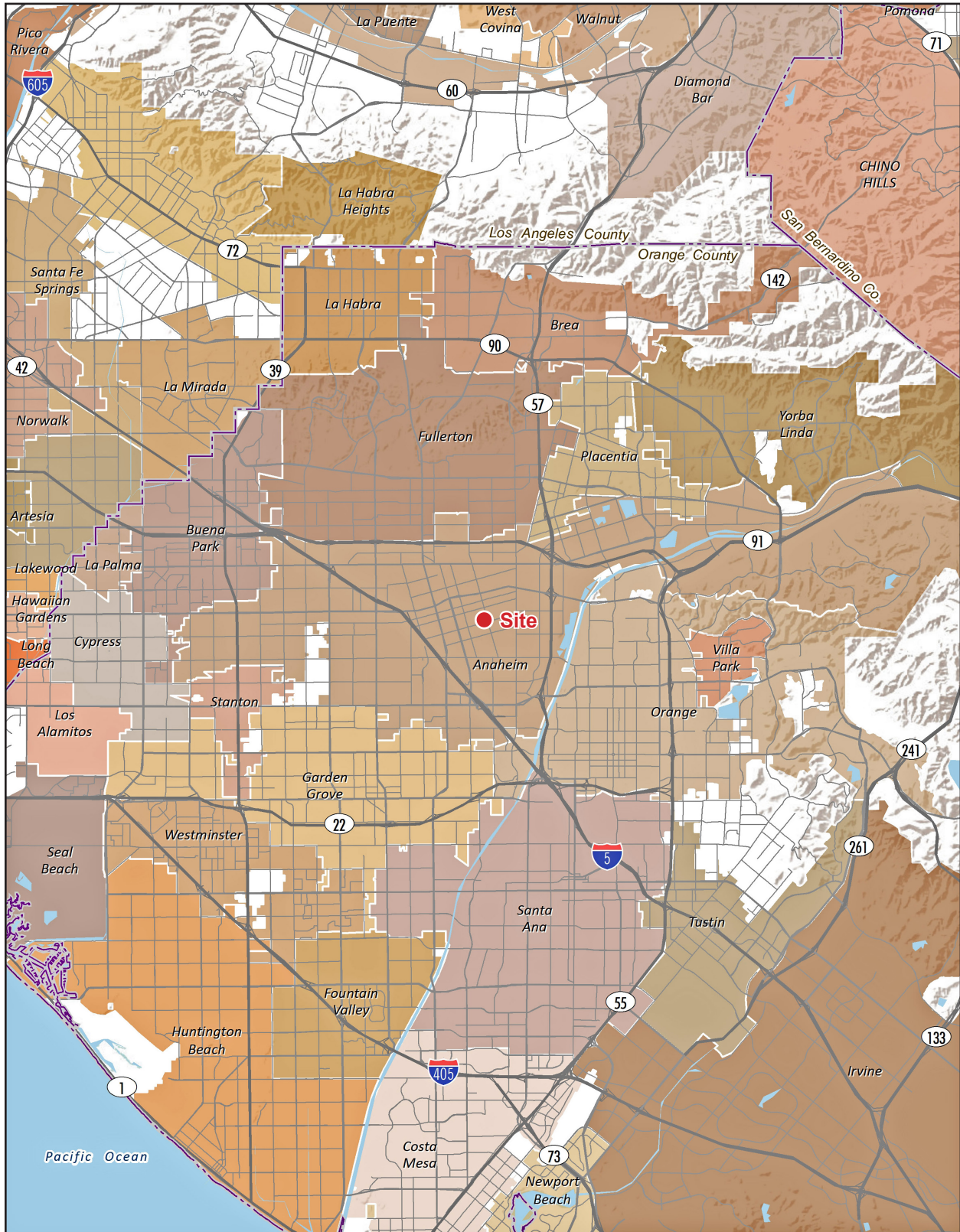
The RO Overlay Zone allows housing development opportunities consistent with a property's General Plan land use designation. The Overlay Zone is further intended to serve as an implementation tool of the City's Housing Element of the General Plan by facilitating residential development on identified "housing opportunity sites" (City of Anaheim Municipal Code Section 18.34.010). The Project Site's Low-Medium Density Residential land use designation allows development of up to 18 dwelling units per acre. With implementation of the RO Overlay Zone, development of up to 32 residential units would be permitted onsite. The RO Overlay Zone was applied to the Project Site by the aforementioned Rezoning Project. The addition of the Overlay Zone did not affect the current or future non-residential development rights for the property and did not obligate the owner of the site to develop the property with housing.

Anaheim Colony Historic District

The project site is in Anaheim's largest historic district, the Anaheim Colony Historic District (District). The boundaries of the 1.8-square-mile District match the original German Colony founded in 1857 (North, South, East and West Streets).

¹ The railroad track carries Amtrak intercity passenger trains, Metrolink commuter trains, and BNSF Railway freight traffic.

Figure 1 - Regional Location
2. Environmental Setting



Note: Unincorporated county areas are shown in white.



Base Map Source: ESRI, USGS, NOAA, 2017

2. Environmental Setting

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Figure 2 - Local Vicinity
2. Environmental Setting



— Project Boundary

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Scale (Feet)

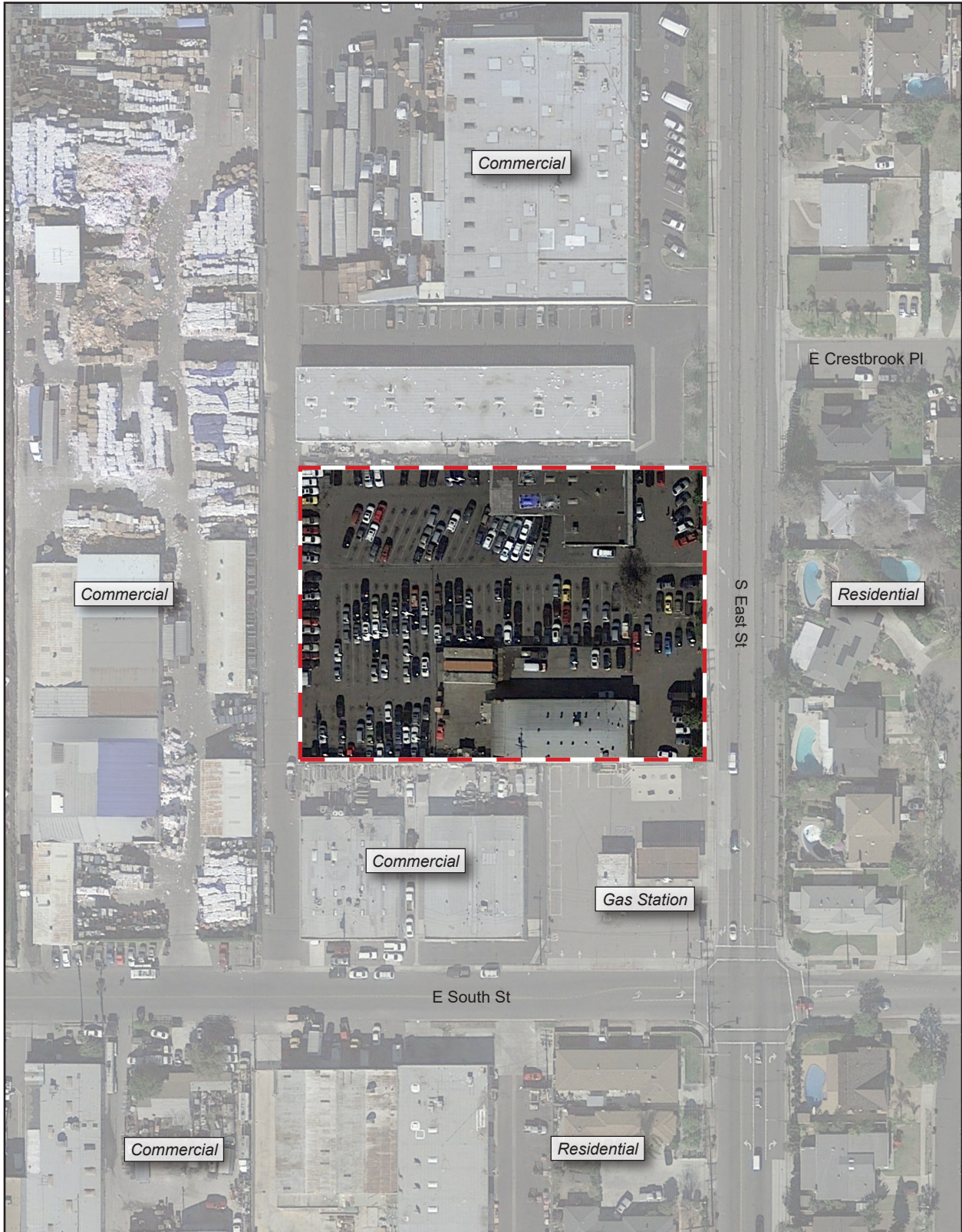


Base Map Source: ESRI, USGS, NOAA, 2017

2. Environmental Setting

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Figure 3 - Aerial Photograph
2. Environmental Setting



— Project Boundary

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Scale (Feet)



Base Map Source: Google Earth Pro, 2017

2. Environmental Setting

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Figure 4a - Site Photographs
2. Environmental Setting



Photo 1. View looking northwest from the east part of the site showing the Quartz Auto Auction building at 633 South East Street.



Photo 2. View looking southwest from the east part of the site showing the McLogan Supply Company building at 711 South East Street.

2. Environmental Setting

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Figure 4b - Site Photographs
2. Environmental Setting



Photo 1. View looking southeast across the site from the northwest part of the site.



Photo 2. View looking northeast across the site from the southwest part of the site.

2. Environmental Setting

2. Environmental Setting

2.2.5 Environmental Resources

The Project Site area is completely developed and there are no native biological resources within the area. The Project Site contains no historic buildings, housing, scenic resources, mineral resources, notable trees, or water bodies. Additional information regarding environmental resources—or the lack of such resources—on the Project Site can be found in Section 5, Environmental Analysis, of this Addendum under each respective environmental topic.

3. Project Description

3.1 PROJECT BACKGROUND

In May 2004, the City of Anaheim certified the General Plan and Zoning Code Update Program EIR No. 330 (EIR No. 330). EIR No. 330 evaluated impacts associated with implementation of the Anaheim General Plan and Zoning Code Update (Update Project) and created a Mitigation Monitoring Program No. 122 to mitigate those impacts. The Project Site was designated for Low-Medium Density Residential land use as a part of the Update Project.

In September 2013, the City of Anaheim certified Supplemental Environmental Impact Report No. 346 (SEIR No. 346) for the Anaheim Housing Opportunities Site Rezoning Project (Rezoning Project). The City approved Mitigation Monitoring Program No. 122A as part of SEIR No. 346. SEIR No. 346 supplemented EIR No. 330 in the areas of air quality, greenhouse gas emissions, noise, and transportation and traffic. The Rezoning Project implemented a key strategy of the City's 2006-2014 General Plan Housing Element by rezoning the properties identified as Housing Opportunities Sites in the Housing Element. The proposed rezoning of these approximately 166 sites allowed "by-right" housing development at these locations by applying one of two overlay zones to these properties: the RO Overlay Zone or the Mixed Use (MU) Overlay Zone. The Project Site was reclassified to the RO Overlay Zone as a part of the Rezoning Project.

Mitigation Monitoring Program (MMP) No. 122 was approved as part of EIR No. 330, and Updated and Modified MMP No. 122A was approved as part of SEIR No. 346. EIR No. 330 and SEIR No. 346 are collectively referred as the "Certified EIR." The Update Project and the Rezoning Project are collectively referred to as the "Approved Project." The City has determined that an Addendum to the Certified EIR would be the appropriate environmental review for the Proposed Project, consistent with Section 15162 and 15163 of the CEQA Guidelines. Applicable Mitigation Measures from Updated and Modified MMP No. 122A have been incorporated into Mitigation Monitoring Plan [MMP] No. 347 for the Proposed Project.

3.1.1 Previous Environmental Analysis

3.1.1.1 EIR NO. 330 FOR THE UPDATE PROJECT

The Update Project identified the City's vision for its build-out through 2035. The Update Project included revisions to the existing Land Use Element (including new and re-named land use designations); the Redevelopment Element (now incorporated into the Economic Development Element); Circulation (which would thenceforth contain the existing Scenic Highways Element); Environmental Resource and Management section (incorporated into the Green Element); Growth Management Element; Parks, Recreation and Community Services Element (incorporated into the new Green Element); Noise; and, Safety

3. Project Description

and Seismic Safety Element (combined into one Safety Element). In addition to the topics addressed in the previous General Plan Elements, new goals, policies and programs were developed to address community design, economic development, and public services and facilities in the form of new Elements for each topic. The new Green Element combined two required elements of the General Plan (Open Space and Conservation which are part of the existing Environmental Resource and Management section) with an optional element, Parks, Recreation and Community Services. The Project Site was designated for Low-Medium Density Residential land use as a part of this project.

The Update Project also involved a comprehensive update to Title 18 of the Anaheim Municipal Code, which contains the City's zoning regulations. Title 18 was amended to implement the updated General Plan (e.g., creation of development standards to implement the proposed Mixed-Use and Corridor Residential land use designations, creation of development standards that are consistent with the Community Design Element, etc.) and included innovative zoning solutions that convey community expectations for future development. Other actions included amendments to the Anaheim Stadium Master Land Use Plan and/or the development of an overlay zone for this area (which was subsequently implemented as the Platinum Triangle Master Land Use Plan and the Platinum Triangle Mixed Use Overlay Zone), Anaheim Resort Specific Plan, the Northeast Area Specific Plan (including associated zoning reclassifications) and zoning reclassifications within the Cypress Canyon Specific Plan Area, and portions of the Anaheim Colony Historical District consistent with and necessary to implement the General Plan and Zoning Code Update.

3.1.1.2 SEIR NO. 346 FOR THE REZONING PROJECT

The Rezoning Project implemented a key strategy of the City's 2006-2014 General Plan Housing Element by rezoning the properties identified as Housing Opportunities Sites in the Housing Element. The proposed rezoning of these approximately 166 sites allowed "by-right" housing development at these locations by applying one of two overlay zones to these properties: the Residential Opportunities Overlay Zone or the Mixed Use Overlay Zone. The identified properties were already designated for residential use by the City's General Plan, but were zoned for and/or developed with, non-residential uses. The addition of the overlay zone did not affect the current or future non-residential development rights that exist on the property today and did not obligate any owner of these sites to develop their property with housing. The Rezoning Project also included a proposed amendment to the City's Zoning Code (Title 18 of the Anaheim Municipal Code) to permit "by-right" residential development on Housing Opportunity Sites located within the Mixed Use Overlay Zone. The Project Site was reclassified to the RO Overlay Zone as a part of this project.

The Rezoning Project further included an update of General Plan Land Use Element Tables LU-5: Residential Build-Out Estimates and LU-6: Non-Residential Build-Out Estimates to reflect all General Plan Amendments that had been adopted since the City's General Plan was adopted in May 2004.

Certification of SEIR No. 346 also enabled the City to utilize the Statutory Infill Housing Exemption allowed under the California Environmental Quality Act (CEQA) and take advantage of other CEQA streamlining authorized per Senate Bill 226 (Chapter 469, Statutes of 2011) by providing updated community level environmental review.

3. Project Description

3.2 PROJECT DESCRIPTION

The Proposed Project would include the demolition of the existing buildings at the Project Site and the development of 42 for-sale, two- and three-bedroom condominiums in eight 3-story buildings.

Site Plan

The units would be in eight 3-story buildings about 38 feet high and containing either four or six units each. One row of three buildings would be built north of a proposed central east-west driveway; a second row of three buildings would be built south of the driveway; and two buildings would be built in the west end of the site (see Figure 5, *Site Plan*). Building exteriors would consist of stucco with tile roofs (see Figure 6, *Elevations, 6-Unit Building*).

Floor Plans

Units would range from two bedrooms with 2.5 baths to three bedrooms with 3.5 baths, and from 1,355 to 1,707 gross square feet of living area.² Each unit would be three levels with garages on the first level; living room, dining room, and kitchen on the second level; and two bedrooms with bathrooms on the third level. Some unit plans would have a third bedroom with bathroom on the first or second level. Two floor plans are shown on Figure 7, *Floor Plans 3 and 4*.

Project Access and Circulation

Access to the Project Site would be provided along East Street via one main driveway about 305 feet north of South Street. Three driveways would branch off the main driveway: one north-south driveway in the west part of the site providing access to the four buildings in the west half of the site, and two north-south driveways in the east part of the site providing access to the remaining four buildings. The main driveway would be a fire lane, and the intersection of the main driveway with the westerly north-south driveway would be a fire turnaround.

Parking

Two garage parking spaces would be provided for each unit in either two-car or tandem garages, and 27 open parking spaces would be provided, for a total of 111 spaces - the total required by City of Anaheim Municipal Code Section 18.42.030.

Landscaping

The project would provide 16,263 square feet of open space (0.37 acre, or about 21 percent of the Project Site), to include about 5,872 square feet of common open space and 10,391 square feet of private patios and yards. Common open space would include a seating area for small gatherings and a wood shade structure, both in the west-central part of the Project Site (see Figure 5, *Site Plan*).

² Living area excludes garages, porches, and decks.

3. Project Description

3.3 DISCRETIONARY ACTIONS

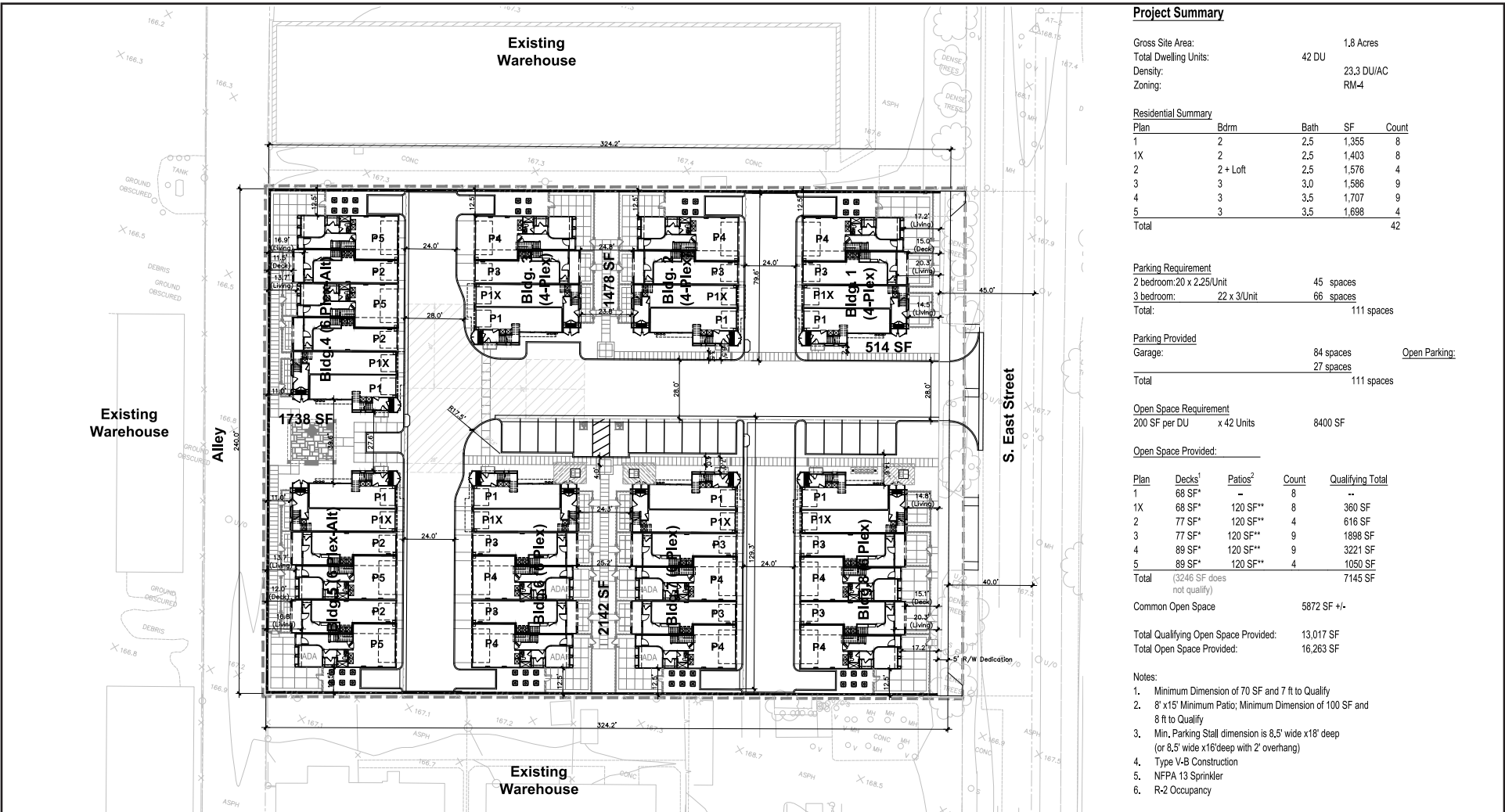
This Addendum to EIR No. 330 and SEIR No. 346 is intended to serve as the primary environmental document for all future actions associated with the Proposed Project, including all discretionary approvals requested or required to implement the Proposed Project. In addition, this Addendum is the primary reference document for the formulation and implementation of a mitigation monitoring plan (Mitigation Monitoring Plan No. 347) for the Proposed Project. All applicable measures from the mitigation and monitoring programs approved in conjunction with EIR No. 330 and SEIR No. 346 have been incorporated into this document. This document is intended to provide sufficient information to allow the City of Anaheim and any other permitting agencies to evaluate the potential impacts from construction and implementation of the Proposed Project. The following discretionary actions have been requested by the Project Applicant:

- **General Plan Amendment (GPA 2017-00512).** The Proposed Project includes a General Plan Amendment to change the General Plan land use designation for the Project Site from Low-Medium Density Residential to Medium Density Residential. The Low-Medium Density Residential land use designation allows development of up to 18 dwelling units per acre on the site; the proposed Medium Density Residential land use designation would allow up to 36 dwelling units per acre. The Proposed Project would be developed at a density of 23.3 dwelling units per acre.
- **Conditional Use Permit (CUP2016-05902).** The applicant is requesting approval of Conditional Use Permit to allow a Planned Unit Development.
- **Tentative Tract Map (SUBTM18088).** The applicant is requesting approval of a Tentative Tract Map to create one lot, 42-unit residential subdivision for condominium purposes.

3. Project Description

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Figure 5 - Site Plan
3. Project Description



Project Summary

Gross Site Area:	1.8 Acres
Total Dwelling Units:	42 DU
Density:	23.3 DU/AC
Zoning:	RM-4

Residential Summary

Plan	Bdrn	Bath	SF	Count
1	2	2.5	1,355	8
1X	2	2.5	1,403	8
2	2 + Loft	2.5	1,576	4
3	3	3.0	1,586	9
4	3	3.5	1,707	9
5	3	3.5	1,698	4
Total				42

Parking Requirement

2 bedroom: 20 x 2.25/Unit	45 spaces
3 bedroom: 22 x 3/Unit	66 spaces
Total:	111 spaces

Parking Provided

Garage:	84 spaces	Open Parking:	27 spaces
Total	111 spaces		

Open Space Requirement

200 SF per DU	x 42 Units	8400 SF
---------------	------------	---------

Open Space Provided:

Plan	Decks ¹	Patios ²	Count	Qualifying Total
1	68 SF*	-	8	--
1X	68 SF*	120 SF**	8	360 SF
2	77 SF*	120 SF**	4	616 SF
3	77 SF*	120 SF**	9	1898 SF
4	89 SF*	120 SF**	9	3221 SF
5	89 SF*	120 SF**	4	1050 SF
Total	(3246 SF does not qualify)			7145 SF

Common Open Space 5872 SF +/-

Total Qualifying Open Space Provided: 13,017 SF

Total Open Space Provided: 16,263 SF

- Notes:**
- Minimum Dimension of 70 SF and 7 ft to Qualify
 - 8' x 15' Minimum Patio; Minimum Dimension of 100 SF and 8 ft to Qualify
 - Min. Parking Stall dimension is 8.5' wide x 18' deep (or 8.5' wide x 16' deep with 2' overhang)
 - Type V-B Construction
 - NFPA 13 Sprinkler
 - R-2 Occupancy



3. Project Description

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Figure 6 - Elevations, 6-Unit Building
3. Project Description



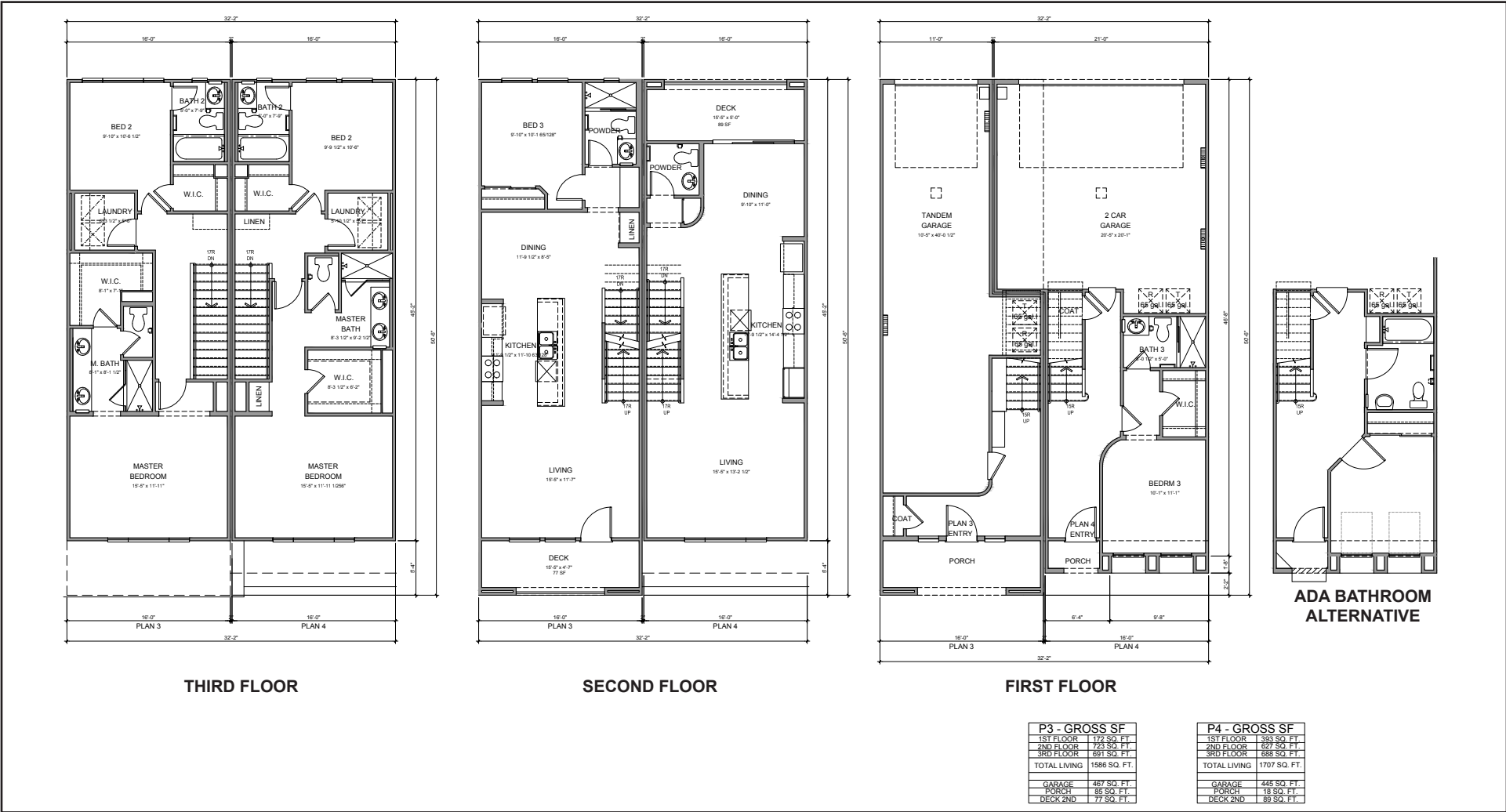
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Scale (Feet)

Base Map Source: KGTY, 2016

3. Project Description

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Figure 7 - Floor Plans 3 and 4
3. Project Description



3. Project Description

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4. Environmental Checklist

4.1 BACKGROUND

1. **Project Title:** Olson East Street Townhomes Project

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

City of Anaheim
Planning and Building Department
200 South Anaheim Boulevard
Anaheim, CA 92805

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

Christine Saunders, Associate Planner
(714) 765-5238

4. **Project Location:**

The 1.79-acre Project Site is on the west side of East Street at 633 and 711 South East Street. Local access to the Project Site is via East Street and South Street.

5. **Project Sponsor's Name and Address:**

The Olson Company

3010 Old Ranch Parkway, Suite 100
Seal Beach, CA 90740

6. **General Plan Designation:** Low-Medium Density Residential

7. **Zoning:** Industrial (I) Zone and a Residential Opportunity (RO) Overlay Zone

8. **Description of Project:**

The Proposed Project would include the demolition of the existing buildings at the site and the development of 42 two and three-bedroom townhomes in eight three-story buildings. The project would include both common and private open space areas and 111 parking spaces: 84 garaged spaces and 27 surface spaces. The Approved Project permits development of up to 32 residential units onsite; thus, impacts analyzed in Chapter 5 of this Addendum are those of development of the net increase of 10 units.

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

The Project Site is currently occupied by two businesses, an auto auction company at 633 South East Street and a Digital Arts/Sign Company at 711 South East Street. Each business occupies one building;

4. Environmental Checklist

the two buildings total approximately 12,000 square feet. Most of the site is paved surface parking used by the auto auction company.

The project site is surrounded by industrial uses to the north; by a recycling facility to the west; by a gas station, industrial uses, and multifamily residential use to the south; and by detached single-family residences opposite East Street to the east.

-
- 10. Other Public Agencies Whose Approval Is Required** (e.g., permits, financing approval, or participation agreement):
None.

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4.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that would represent a new significant environmental effect, a substantial increase in the severity of a significant impact previously identified, or new information of substantial importance, as indicated by the checklist on the following pages.

- | | | |
|---|--|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agricultural and Forest Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology / Soils |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Hydrology / Water Quality |
| <input type="checkbox"/> Land Use / Planning | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Population / Housing | <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Transportation / Traffic | <input type="checkbox"/> Utilities / Service Systems | <input type="checkbox"/> Mandatory Findings of Significance |

4.3 DETERMINATION (TO BE COMPLETED BY THE LEAD AGENCY)

On the basis of this initial evaluation:

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

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

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

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

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

Signature

Date

Printed Name

For

4. Environmental Checklist

4.4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

4. Environmental Checklist

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

4. Environmental Checklist

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5. Environmental Analysis

As discussed previously, this document is an addendum to both EIR No. 330 and SEIR No. 346. Therefore, this document incorporates applicable analysis from both EIR No. 330 and SEIR No. 346. This section provides the evidence that no new significant impacts would occur as a result of the Proposed Olson East Street Townhomes Project (Proposed Project) in comparison to the Anaheim General Plan and Zoning Code Update (Update Project) and the Anaheim Housing Opportunities Site Rezoning Project (Rezoning Project), collectively referred to as the “Approved Project,” or whether a change in circumstances has occurred in relation to the Approved Project, as analyzed by EIR No. 330 and SEIR No. 346, collectively referred to as the “Certified EIR.” In accordance with Section 21166 of CEQA and 15162 of the CEQA Guidelines, and relevant case law, the baseline for this determination is the Approved Project. The section will briefly summarize the conclusions of EIR No. 330 and SEIR No. 346 and then discuss whether or not the Proposed Project is consistent with the findings in those documents. Applicable mitigation measures from EIR No. 330 and SEIR No. 346 are also incorporated into this section and will be compiled into Mitigation Monitoring Plan No. 347. The components of the mitigation program are described below.

- **Standard Requirements (SRs).** Existing SRs are based on local, state, or federal regulations or laws that are frequently required independently of CEQA review and also serve to offset or prevent specific impacts. Typical SRs include compliance with the provisions of the California and local building codes, South Coast Air Quality Management District rules, City ordinances, and local agency impact fees, among others.
- **Mitigation Measures (MMs).** Where a potentially significant environmental effect has been identified and is not reduced to a level considered less than significant through the application of SRs, mitigation measures have been provided. All applicable measures from the mitigation and monitoring programs approved in conjunction with EIR No. 330 and SEIR No. 346 have been incorporated into this document. In the instances that mitigation measures identified in SEIR No. 346 are comparable to mitigation measures identified in EIR No. 330, this document incorporates the more recently adopted measures from SEIR No. 346. These mitigation measures have been incorporated into Mitigation Monitoring Plan No. 347 for this Addendum. Any modifications to the mitigation measures from EIR No. 330 and SEIR No. 346 are shown as ~~strikethrough~~ for deleted text and **bold** for new, inserted text.

The City may substitute, at its discretion, any mitigation measure (and timing thereof) that has:(1)The same or superior result as the original mitigation measure and (2) the same or superior effect on the environment. The City of Anaheim Planning Department, in conjunction with any appropriate agencies or City departments, shall determine the adequacy of any proposed “environmental equivalent timing” and, if deemed necessary, may refer said determination to the Planning Commission. Any costs associated with information required in order to make a determination of equivalency/timing shall be borne by the Property Owner/Developer.

5. Environmental Analysis

5.1 AESTHETICS

5.1.1 Summary of Previous Environmental Analysis

EIR No. 330 for the Update Project

Implementation of the Update Project was found to have less than significant impacts on scenic vistas. The City is largely built out. The City contains two major open space features: the Hill and Canyon Area in the east part of the City, and the Santa Ana River. The segment of State Route (SR) 91 between SR-55 and the east city boundary is a designated State scenic highway. The Update Project included policies to protect view corridors and scenic resources within the SR-91 scenic highway, including designating 7,788 acres in the City as Open Space/Recreation, to include 5,093 acres of Open Space.

SEIR No. 346 for the Rezoning Project

The Rezoning Project was found to have less than significant impacts on visual character, scenic vistas, and scenic resources, as the rezoning would be consistent with the General Plan land use designations analyzed in EIR No. 330 for the Update Project.

5.1.2 Impacts Associated with the Proposed Project

Would the Proposed Project:

Environmental Issues	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstances Requiring Major EIR Revisions	New Information Showing New or Increased Significant Effects	Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
a) Have a substantial adverse effect on a scenic vista?				X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?					X
c) Substantially degrade the existing visual character or quality of the site and its surroundings?				X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				X	

The project site is surrounded by industrial uses to the north; by a recycling facility to the west; by a gas station, industrial uses, and multifamily residential use to the south; and by detached single-family residences opposite East Street to the east.

No scenic vistas are visible from the site, as views of the Santa Ana Mountains are blocked by houses and trees opposite East Street and views of the San Gabriel Mountains are blocked by industrial buildings to the north.

There are no scenic resources onsite. The two commercial buildings onsite are not historical buildings. One mature tree in front of 633 South East Street is an ornamental landscape tree common to urban areas and is not a scenic resource.

Light sources onsite consist of exterior and interior building lights, parking lot lights, and vehicle lights.

Comments:

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

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

There are no scenic vistas visible from the project site, as views of the Santa Ana Mountains are blocked by houses and trees opposite East Street and views of the San Gabriel Mountains are blocked by industrial buildings to the north. Accordingly, no new significant impacts or impacts of greater severity than those previously identified in EIR No. 330 or SEIR No. 346 would occur. No changes or new information would require preparation of a subsequent EIR.

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

No Impact. The Project Site does not contain scenic resources such as trees, rock outcroppings, or historic buildings. Furthermore, the Project Site is not visible from the nearest state-designated scenic highway, SR-91, about 4.5 miles to the northeast. Therefore, as under the Approved Project, no impact would occur due to implementation of the Proposed Project, and no mitigation is necessary. Accordingly, no new significant impacts or impacts of greater severity than those previously identified in EIR No. 330 or SEIR No. 346 would occur. No changes or new information would require preparation of a subsequent EIR.

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

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The Project Site is built out with commercial uses, consisting of two buildings and paved surface parking. The Proposed Project consists of development of townhomes including common and private open spaces and a landscape plan. Thus, the Proposed Project would improve the visual character of the Project Site.

No changes proposed by the Proposed Project would result in new impacts to visual character or quality. No impacts of greater severity than those previously identified in EIR No. 330 or SEIR No. 346 would occur, and no changes or new information would require preparation of a subsequent EIR.

5. Environmental Analysis

- 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/No Changes or New Information Requiring Preparation of an EIR.
The Project Site contains building lights and parking lot lights. The Proposed Project would involve installation of lighting including interior and exterior building lights. Therefore, consistent with the conclusions in EIR No. 330 and SEIR No. 346, the continuation of nighttime illumination features would not represent a new, significant impact with regard to lighting or glare.

5.1.3 Adopted Mitigation Measures Applicable to the Proposed Project

No mitigation measures related aesthetics were outlined in the Certified EIR.

5.2 AGRICULTURE AND FOREST RESOURCES

5.2.1 Summary of Previous Environmental Analysis

EIR No. 330 for the Update Project

EIR No. 330 identified areas in the City designated as Prime and Unique Farmland by the California Resources Agency. However, implementation of the General Plan would not change land use designations on any mapped farmland. In addition, there were no Williamson Act contracts in effect in the City at the time or the Update Project or currently. No impact would occur.

SEIR No. 346 for the Rezoning Project

The findings of SEIR No. 346 regarding impacts to agriculture and forest resources were the same as those of EIR No. 330. No impact would occur.

5.2.2 Impacts Associated with the Proposed Project

Would the project:

Environmental Issues	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstances Requiring Major EIR Revisions	New Information Showing New or Increased Significant Effects	Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?					X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?					X

Environmental Issues	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstances Requiring Major EIR Revisions	New Information Showing New or Increased Significant Effects	Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	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))?					X
d) Result in the loss of forest land or conversion of forest land to non-forest use?					X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?					X

Comments:

- 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. As indicated above, the Project Site is currently developed and does not contain farmland or other agricultural uses. Like the Approved Project, the Proposed Project would not convert important farmland to nonagricultural use. No impact would occur and no mitigation is necessary. Accordingly, no new significant impacts or impacts of greater severity than those previously identified in EIR No. 330 or SEIR No. 346 would occur. No changes or new information would require preparation of a subsequent EIR.

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

No Impact. The Project Site is not zoned for agricultural use and is not subject to a Williamson Act contract. As under the Approved Project, implementation of the Proposed Project would not conflict with agricultural zones or a Williamson Act contract. No impact would occur and no mitigation is necessary. Accordingly, no new significant impacts or impacts of greater severity than those previously identified in EIR No. 330 or SEIR No. 346 would occur. No changes or new information would require preparation of a subsequent EIR.

- 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))?**

5. Environmental Analysis

No Impact. As discussed above, the Project Site is developed with commercial uses and is not forested. As with the Approved Project, the Proposed Project would not conflict with zoning for forest land timberland. No impact would occur and no mitigation is necessary. Accordingly, no new significant impacts or impacts of greater severity than those previously identified in EIR No. 330 or SEIR No. 346 would occur. No changes or new information would require preparation of a subsequent EIR.

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

No Impact. No forest land is present on the Project Site. As under the Approved Project, implementation of the Proposed Project would not result in the loss of forest land or the conversion of forest land to non-forest uses. No impact would occur and no mitigation is necessary. Accordingly, no new significant impacts or impacts of greater severity than those previously identified in EIR No. 330 or SEIR No. 346 would occur. No changes or new information would require preparation of a subsequent EIR.

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. The Project Site and surrounding area contain no farmland or forest land. As under the Approved Project, implementation of the Proposed Project would not result in the loss of forest land or the conversion of forest land to non-forest uses. No impact would occur and no mitigation is necessary. Accordingly, no new significant impacts or impacts of greater severity than those previously identified in EIR No. 330 or SEIR No. 346 would occur. No changes or new information would require preparation of a subsequent EIR.

5.2.3 Adopted Mitigation Measures Applicable to the Proposed Project

No mitigation measures related to agricultural resources were outlined in the Certified EIR.

5.3 AIR QUALITY

5.3.1 Summary of Previous Environmental Analysis

EIR No. 330 for the Update Project

EIR No. 330 concluded that some major construction activity could be occurring at any given time over the life of the General Plan, which could exceed South Coast Air Quality Management District's (SCAQMD) significance thresholds even with implementation of all identified mitigation measures. Actual significance would need to be determined on a project by project basis as future development applications are submitted. The Anaheim City Council adopted a Statement of Overriding Considerations with regard to this potential impact.

EIR No. 330 concluded that, even with implementation of all identified mitigation measures, operational emissions from local and regional vehicle sources, natural gas, landscape maintenance equipment, and consumer goods, would exceed SCAQMD's significance thresholds for carbon monoxide (CO), nitrogen

oxides (NO_x), volatile organic compounds (VOCs) (ROG), and particulate matter with a diameter of 10 microns or less (PM₁₀). The Anaheim City Council adopted a Statement of Overriding Considerations with regard to this potential impact.

EIR No. 330 determined that since the 2003 Air Quality Management Plan (AQMP) recognizes that emissions due to trips and mode choices are not only a function of the transportation system, but also relate to the proximity of housing and job-generating land uses, and proximity of jobs to transportation infrastructure and transit, the Update Project is consistent with the 2003 AQMP as the Update Project facilitates the development of housing opportunities in close proximity with regional employment and transportation centers. The Update Project is also considered consistent with the Goals and Policies of Southern California Association of Governments' (SCAG) 2016 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS).

EIR No. 330 identified that while no CO exceedance would be caused by the project, the City could place sensitive land uses proximate to areas with elevated CO concentrations. However, implementation of General Plan goals and policies would ensure that mitigation would reduce impacts to less than significant levels.

EIR No. 330 demonstrated that there would be no CO exceedances caused by vehicular emissions when idling at intersections, therefore localized CO hot spot impacts would be less than significant. Also, odors generated within the City would not affect a substantial number of people and impacts would be less than significant.

SEIR No. 346 for the Rezoning Project

SEIR No. 346 concluded that construction emissions associated with buildout of the Rezoning Project could result in a substantial increase in criteria air pollutants that would exceed SCAQMD's significance thresholds even with implementation of all identified mitigation measures. Actual significance would need to be determined on a project by project basis. The Anaheim City Council adopted a Statement of Overriding Considerations with regard to this potential impact.

SEIR No. 346 determined that operational emissions associated with the buildout of the Rezoning Project would exceed SCAQMD's significance thresholds even with implementation of all identified mitigation measures. The Anaheim City Council adopted a Statement of Overriding Considerations with regard to this potential impact.

SEIR No. 346 demonstrated that operation of the Rezoning Project may result in placement of sensitive land uses proximate to major sources of air pollution. However, implementation of mitigation measures would reduce impacts to less than significant levels.

SEIR No. 346 identified that operation of the Rezoning Project would not have a significant impact related to exposure of sensitive receptors to elevated concentrations of CO at intersections.

5. Environmental Analysis

5.3.2 Impacts Associated with the Proposed Project

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 Proposed Project:

Environmental Issues	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstances Requiring Major EIR Revisions	New Information Showing New or Increased Significant Effects	Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?				X	
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?				X	
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)?				X	
d) Expose sensitive receptors to substantial pollutant concentrations?				X	
e) Create objectionable odors affecting a substantial number of people?				X	

Methodology

Methodology to evaluate air quality impacts under CEQA has been updated since the EIR No. 330 and SEIR No. 346 were certified, in 2004 and 2013, respectively. SCAQMD has published updates to the Air Quality Analysis Guidance Handbook that provides local governments with guidance for analyzing and mitigating project-specific air quality impacts. These updates include a 2015 update to the SCAQMD Air Quality Significance Thresholds, and a 2006 update to the Localized Significance Thresholds. SCAQMD's most recent air quality analysis model, CalEEMod Version 2016.3.1., was utilized to model emissions under the Proposed Project, and these results were used to compare the impacts of the Approved Project to the Proposed Project.

Under the Approved Project, the project site would be developed with 32 units, and the Proposed Project increases the scope of development by 10 units for a total of 42 units. For purposes of this analysis, construction and operation-phase emissions calculated for the Proposed Project represent the total emissions for the proposed 42-unit development. This approach yields a conservative estimate for operation-phase emissions since modeling represents more than the net increase of 10 units. The net change of 10 units from

the approved 32-unit development under the Approved Project would result in even fewer emissions. In addition, it is assumed that construction of a 42-unit residential development compared to a 32-unit development would require similar construction processes. Thus, the construction emissions quantified for the Proposed Project would be representative of emissions associated with the Approved 32-unit development. Resulting construction and operational phase emissions are compared to the significance thresholds adopted by the SCAQMD. Air quality modeling results are included in Appendix A.

Comments:

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

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

EIR No. 330 determined that the Update Project would not increase the frequency or severity of air quality violations in the SoCAB and would not exceed the assumptions of the AQMP. As a result, impacts of the Update Project were considered less than significant. In addition, as analyzed in the Initial Study in support of the Notice of Preparation prepared for SEIR No. 346, it was also determined that the Rezoning Project, as considered, would also be consistent with the AQMP and result in a less than significant impact.

SCAQMD is directly responsible for regulating the reduction of emissions from area, stationary, and mobile sources in the SoCAB to achieve National and California Ambient Air Quality Standards (AAQS). March 3, 2017, the SCAQMD Governing Board adopted the 2016 AQMP. The Proposed Project would result in changes to the Approved Project.

The two principal criteria for conformance to an AQMP are:

1. Whether the project would result in an increase in the frequency or severity of existing air quality violations; cause or contribute to new violations; or delay timely attainment of air quality standards and
2. Whether the project would exceed the assumptions in the AQMP.

With respect to the first criterion, the analyses in responses to 5.3(b) and 5.3(c) below demonstrate that the Proposed Project would not generate short-term or long-term emissions of criteria pollutants that could potentially cause an increase in the frequency or severity of existing air quality violations; cause or contribute to new violations; or delay timely attainment of air quality standards beyond those impacts considered in the Certified EIR.

SCAG determines whether a project is regionally significant per CEQA Guidelines Section 15206(b), which states that the lead agency shall determine that a Proposed Project is of statewide, regional, or area-wide significance if the project is a residential development of more than 500 dwelling units. Therefore, the Proposed Project, which includes 42 dwelling units, is not considered regionally significant by SCAG and the Proposed Project would not have the potential to substantially affect SCAG's demographic projections. As discussed in Chapter 5.13, the population, housing, and employment growths introduced by the Proposed Project would be within the citywide net increase in population growth estimated for Approved Project buildout. Therefore, with respect to the second criterion, the Proposed Project would not increase or modify

5. Environmental Analysis

SCAG's population, housing, or employment projections beyond what was already anticipated for the area in the Certified EIR. Therefore, the Proposed Project would be consistent with the region's AQMP. Therefore, the Proposed Project would not create a new significant impact or a substantial increase in the severity of previously identified effects. No changes or new information would require preparation of a subsequent EIR.

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

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The following describes changes in regional impacts from short-term construction activities and long-term operation of the Proposed Project compared to construction and operation of the Approved Project.

Construction-Related Impacts

The Certified EIR identified that criteria air pollutant emissions generated during construction activities could generate emissions that exceeded the SCAQMD regional thresholds. Mitigation measures were incorporated into the Certified EIR to reduce impacts. However, actual significance would need to be determined on a project by project basis.

Table 1, *Maximum Daily Regional Construction Emissions*, shows the maximum daily construction emissions of the Approved Project identified in SEIR No. 346 as well as the maximum daily construction emissions for the Proposed Project. SEIR No. 346 identified that criteria air pollutant emissions generated during construction activities could generate emissions that exceeded the SCAQMD thresholds. Mitigation measures were incorporated into the Certified EIR to reduce impacts, to the extent feasible. However, air quality emissions related to construction activities must be addressed on a project-by-project basis to determine whether individual projects would result in the exceedance of SCAQMD's short-term regional or localized construction emissions thresholds. As stated in Section 5.3.1, Summary of Previous Environmental Analysis, the Anaheim City Council adopted a Statement of Overriding Considerations with regard to this potential impact.

As shown in Table 1, the highest construction emissions associated with the Proposed Project would occur during grading activities, which are anticipated to occur in 2018. Criteria air pollutants, including VOCs, NO_x, CO, PM₁₀, and PM_{2.5}, would not be significant for the Proposed Project. Consequently, the Proposed Project would not result in an increase in the severity of any previously identified significant impacts compared to those identified in the Certified EIR. Therefore, the Proposed Project would not create a new significant impact or a substantial increase in the severity of previously identified effects. No changes or new information would require preparation of a subsequent EIR.

Operation-Related Impacts

The Certified EIR found that operational emissions from local and regional vehicle sources, natural gas, landscape maintenance equipment, and consumer goods, would exceed SCAQMD's significance thresholds. Table 2, *Maximum Daily Regional Operational Phase Emissions*, shows the maximum daily operational emissions associated with the Approved Project as identified in the Certified EIR as well as the maximum daily

operation emissions for the Proposed Project. As previously stated, the total Proposed Project emissions represent the entire 42-unit development rather than the 10 unit increase from the 32-unit development allowed under the Approved Project. The Proposed Project would increase operational emissions generated by the project site by approximately 24 percent, as compared to the 32 dwelling units assumed for the site in the Approved Project. However, as shown in Table 2, operational emissions for the Approved Project and Proposed Project are below the SCAQMD regional operation thresholds and are not considered significant. Consequently, the Proposed Project would not result in a new significant impact or an increase in the severity of any previously identified significant impacts compared to those identified in the Certified EIR. No changes or new information would require preparation of a subsequent EIR.

Table 1 Maximum Daily Regional Construction Emissions

Construction Phase	Pollutants (pounds per day)					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
City-wide Emissions Identified in EIR No. 346¹						
Construction	377	2,590	2,260	3	161	159
SCAQMD Regional Construction Threshold	75	100	550	150	150	55
Significant?	Yes	Yes	Yes	No	Yes	Yes
Proposed Project^{2,3}						
2017 Building Demolition + Haul	1	15	8	<1	4	1
2017 Asphalt Demolition	<1	4	5	<1	<1	<1
2018 Asphalt Demo + Haul	<1	12	7	<1	3	1
2018 Site Preparation	<1	6	6	<1	<1	<1
2018 Rough Grading + Haul	2	34	29	<1	7	3
2018 Fine Grading + Haul	<1	11	7	<1	2	<1
2018 Utility Trenching	<1	5	6	<1	<1	<1
2018 Building Construction	2	14	18	<1	2	1
2019 Building Construction	2	14	18	<1	1	1
2019 Paving	<1	8	9	<1	<1	<1
2019 Architectural Coating & Finishing	14	5	7	<1	<1	<1
2019 Building + Paving + Coating/Finishing	16	27	34	<1	2	2
Maximum Daily Emissions	14	35	29	<1	7	3
SCAQMD Regional Construction Threshold	75	100	550	150	150	55
Significant?	No	No	No	No	No	No
Net Change Compared to the Approved Project						
¹ Net Change in Maximum Daily Emissions	-367	-2,556	-2,231	-2	-154	6

Notes: Totals may not equal 100 percent due to rounding. **Bold** = Exceeds SCAQMD threshold.
¹ Anaheim 2013. Table 5.1-8, Summary Comparison of the Proposed Project to the 2004 Approved Project.
² CalEEMod Version 2016.3.1. Based on the preliminary information provided by the Applicant.
³ Includes implementation of fugitive dust control measures consistent with SCAQMD under Rule 403, including, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, street sweeping with Rule 1186-compliant sweepers, as well as use of Tier 3 construction equipment for equipment 50 hp or greater, soil stabilizer for unpaved roads, and watering disturbed areas a minimum of three times per day.
⁴ Net change is shown for informational purposes only to highlight the scale of the proposed 42-unit project compared to the larger overall project.

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Table 2 Maximum Daily Regional Operational Phase Emissions

Source	Criteria Air Pollutants (lbs/day)					
	ROG (VOC)	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
City-wide Emissions Identified in SEIR No. 346¹						
Area	2,433	1,778	38,491	4	204	202
Energy	348	3082	2049	19	240	240
Mobile	4,978	8,045	38,785	197	2,216	999
Total	7,759	12,905	79,325	220	2,660	1,441
SCAQMD Threshold	55	55	550	150	150	55
Exceeds Threshold?	Yes	Yes	Yes	Yes	Yes	Yes
Approved Project (32 units)²						
Area	1	<1	2	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile	<1	<1	4	<1	1	<1
Total	1	<1	6	<1	1	<1
SCAQMD Threshold	55	55	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No
Proposed Project (42 units)²						
Area	2	<1	3	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile	<1	1	6	<1	2	<1
Total	2	1	9	<1	2	<1
SCAQMD Threshold	55	55	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

Note: Totals may not equal 100 percent due to rounding.

¹ Anaheim 2013, Table 5.1-8, Summary Comparison of the Proposed Project to the 2004 Approved Project (excludes construction emissions)

² CalEEMod, Version 2016.3.1. Highest summer or winter emissions.

- c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?**

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The SoCAB is designated nonattainment for O₃ and PM_{2.5} under the California and National AAQS, nonattainment for PM₁₀ under the California AAQS, and nonattainment for lead under the National AAQS (CARB 2016). According to SCAQMD methodology, any project that does not exceed or can be mitigated to less than the daily threshold values would not add significantly to a cumulative impact (SCAQMD 1993).

As stated in threshold 5.3(b), no increase in regional emissions is anticipated compared to that analyzed in the SEIR No. 346, and the cumulative impact would be less than significant.

As discussed under Threshold “b” above, the Proposed Project would not result in a substantial increase in regional construction or operational emissions when compared to the previous analyses. Because direct impacts were previously determined to exceed SCAQMD thresholds, cumulative impacts were determined to

be significant and unavoidable. The Anaheim City Council adopted a Statement of Overriding Considerations for the Approved Project. Therefore, the Proposed Project would not create a new significant impact or a substantial increase in the severity of previously identified effects. No changes or new information would require preparation of a subsequent EIR.

The Certified EIR found that the increase in nonattainment pollutants could result in cumulatively considerable impacts that would be significant and unavoidable. The development of 10 additional dwelling units under Proposed Project would not significantly contribute toward the impacts that were identified in the Certified EIR for the Approved Project. Therefore, the Proposed Project would not create a new significant impact or a substantial increase in the severity of previously identified effects.

d) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The Certified EIR found that short-term localized exposure of persons to PM₁₀ and PM_{2.5} would be a significant and unavoidable impact. Construction and operation of the Proposed Project could generate pollutant emissions and expose sensitive receptors to elevated pollutant concentrations. Unlike regional emissions, localized emissions are typically evaluated in terms of air concentration rather than mass so they can be more readily correlated to potential health effects. The following describes changes in localized impacts from short-term construction activities and long-term operation of the Proposed Project.

Localized Construction Impacts

LSTs are based on the California AAQS, which are the most stringent AAQS that have been established to provide a margin of safety in the protection of public health and welfare. They are designated to protect those sensitive receptors most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and people engaged in strenuous work or exercise. Construction LSTs are based on the size of the project site, distance to the nearest sensitive receptor, and Source Receptor Area (SRA). Receptors proximate to the Proposed Project site include nearby residences approximately 90 feet (28 meters) to the east along South East Street and non-sensitive receptors at the adjacent self-storage facility approximately 80 feet (25 meters) to the north.

Air pollutant emissions generated by construction activities are anticipated to cause temporary increases in air pollutant concentrations. Table 3, *Localized Construction Emissions*, shows the maximum daily emissions (lbs. per day) generated by on-site construction activities compared with the SCAQMD's LSTs. As shown in the table, the maximum daily PM₁₀, NO_x, CO, and PM_{2.5} emissions generated from on-site construction-related activities would be less than their respective SCAQMD LSTs. Therefore, project-related construction activities not expose sensitive receptors to substantial pollutant concentrations.

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Table 3 Localized Construction Emissions

Source	Pollutants(lbs/day) ^{1,2}			
	NO _x	CO	PM ₁₀	PM _{2.5}
2017 Demolition + Demo Debris Haul	4	5	2.84	0.64
2018 Asphalt Demolition	54	5	0.24	0.24
2018 Asphalt Demolition + Haul	4	5	2.27	0.55
2017 Site Preparation	5	6	0.19	0.19
2018 Fine Grading + Haul	5	6	1.51	0.33
2018 Utility Trenching	4	6	0.23	0.23
2018 Building Construction	13	16	0.83	0.83
2019 Building Construction	13	16	0.79	0.79
2019 Architectural Coating + Finishing	5	9	0.38	0.38
2019 Paving	7	9	0.38	0.38
2019 Building + Paving + Coating/Finishing	25	31	1.51	1.51
SCAQMD ≤1-acre LST	81	485	4.78	3.10
Exceeds LST?	No	No	No	No
2018 Rough Grading + Haul	22	25	6.59	2.54
SCAQMD ≤1.8 -acre LST	108	669	6.77	3.98
Exceeds LST?	No	No	No	No

Source: CalEEMod Version 2016.3.2; SCAQMD 2011; and SCAQMD 2008.

Notes: LSTs are based on residential receptors within 90 feet (27 meters) and commercial receptors within 82 feet (25 meters) of a 1.8-acre site in SRA 17.

¹ Air quality modeling based on construction information provided by the Applicant. Where specific construction information was not available, construction assumptions were based on CalEEMod defaults.

² Includes implementation of fugitive dust control measures consistent with SCAQMD under Rule 403, including, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, street sweeping with Rule 1186-compliant sweepers, as well as use of Tier 3 construction equipment for equipment 50 hp or greater, soil stabilizer for unpaved roads, and watering disturbed areas a minimum of three times per day.

Localized Construction Impacts - Health Risk

SCAQMD currently does not require health risk assessments to be conducted for short-term emissions from construction equipment. Emissions from construction equipment primarily consist of diesel particulate matter (DPM), which is a toxic air contaminant (TAC). The Office of Environmental Health Hazards Assessment (OEHHA) adopted guidance for the preparation of health risk assessments in February 2015. OEHHA has developed a cancer risk factor and non-cancer chronic reference exposure level for DPM, but these factors are based on continuous long-term (i.e. 30 years) exposure averaged over a 70-year time frame. No short-term acute exposure levels have been developed for DPM. Nevertheless, the Proposed Project would be developed in approximately 16 months, which is less than the 30-year exposure period for DPM and risk accumulated over a 70-year lifetime, and would limit the exposure to off-site receptors. In addition, construction activities would not exceed LST significance thresholds. For the reasons stated above, it is anticipated that construction emissions would not pose a threat to nearby sensitive receptors.

Localized Operational Impacts

Operation of the Proposed Project would not generate substantial emissions from on-site, stationary sources. Land uses that have the potential to generate substantial stationary-source emissions would require a permit

from SCAQMD and include industrial land uses such as chemical processing and warehousing operations where substantial truck idling could occur on-site. The Proposed Project does not fall within this category of uses. Operation of the Proposed Project would entail the use of standard mechanical equipment (such as heating, ventilation, and air conditioning units) and the occasional use of landscaping equipment for project site maintenance. Air pollutant emissions generated from these activities would be below the SCAQMD LST threshold, as shown in Table 4, *Localized Operation Emissions*. Therefore, localized air quality impacts related to stationary-source emissions would be less than significant.

Table 4 Localized Operation Emissions

Source	Pollutants (pounds per day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Area	<1	3	<1	<1
Energy	<1	<1	<1	<1
Maximum Daily On-site Operation Emissions	<1	3	<1	<1
SCAQMD LST	91	664	1.29	1.10
Exceeds LST?	No	No	No	No

Source: CalEEMod 2016.3.1; SCAQMD 2006, Appendix A.

In accordance with SCAQMD methodology, only on-site stationary sources and on-site mobile equipment are included in the analysis. LSTs are based on residential receptors within 90 feet (27 meters) and commercial receptors within 82 feet (25 meters) of a 1.8-acre site in SRA 17.

Carbon Monoxide Hotspots

The Certified EIR concluded that local concentrations of CO would be below the maximum allowable concentrations in state and federal standards, and impacts related to localized CO levels would be less than significant.

Areas of vehicle congestion have the potential to create pockets of CO called hotspots. These pockets have the potential to exceed the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9.0 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to ambient air quality standards is typically demonstrated through an analysis of localized CO concentrations. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds. Typically, for an intersection to exhibit a significant CO concentration, it would need operate at level of service (LOS) E or worse without improvements (Caltrans 1997).

However, at the time of the 1993 SCAQMD Handbook, the SoCAB was designated nonattainment under the California AAQS and National AAQS for CO. With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations in the SoCAB and in the state have steadily declined. In 2007, the SoCAB was designated in attainment for CO under both the California AAQS and National AAQS. The CO hotspot analysis conducted for the attainment by SCAQMD did not predict a violation of CO standards at the busiest intersections in Los Angeles during the peak

5. Environmental Analysis

morning and afternoon periods.³ As identified in SCAQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan), peak carbon monoxide concentrations in the SoCAB in previous years, prior to redesignation, were a result of unusual meteorological and topographical conditions and not of congestion at a particular intersection. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—in order to generate a significant CO impact (BAAQMD 2011). Once constructed and occupied, the Proposed Project would generate up to 244 average daily trips (LSA Associates 2017). Therefore, the Proposed Project would not produce the volume of traffic required to generate a CO hotspot.

Health Risks from Existing Air Emissions Near the Project Site

Since Certification of SEIR No. 346, the court has clarified that the purpose of an environmental evaluation is to identify the significant effects of the Proposed Project on the environment, not the significant effects of the environment on the Proposed Project (*California Building Industry Association v. Bay Area Air Quality Management District* [2015] 62 Cal.4th 369 [Case No. S213478]). CEQA does not require an analysis of the Proposed Project's environmental effects on potential future sensitive receptors at a project site. However, a health risk assessment (HRA) has been prepared under a separate cover to satisfy this mitigation requirement of SEIR No. 346.

The City of Anaheim requires that developers of residential projects within 1,000 feet of a use that can release substantial amounts of airborne hazardous materials (determined to be "Category 1, 2, or 3" hazardous materials) implement certain mitigation measures to reduce hazards to residents of the Proposed Projects, set forth as EIR No. 330 MM 5.6-2 and SEIR No. 346 MM 5.2-7.

A Health Risk Assessment for the Proposed Project was completed by PlaceWorks in April 2017 pursuant to the aforementioned requirement. This discussion is provided for information only and for compliance with such requirement; health risks from nearby existing sources on future project applicants is not considered a CEQA impact, and no significance determination is made.

Eight emissions sources within 1,000 feet of the Proposed Project site were evaluated: a City of Anaheim facility; five industrial uses; one commercial use – the gas station next to the south site boundary – and locomotives on the LOSSAN Corridor track about 810 feet west of the site. Contaminants evaluated included diesel particulate matter (DPM); a variety of hydrocarbons, including petroleum hydrocarbons; several metals; and ammonia.

As described in the HRA, the residential health risk values from exposures to off-site sources of air emissions were determined based on the 2015 OEHHA adopted guidance. The determined incremental cancer risks are based on maximum ground level concentrations from emissions sources, conservatively assuming a 30-year,

³ The four intersections were: Long Beach Boulevard and Imperial Highway; Wilshire Boulevard and Veteran Avenue; Sunset Boulevard and Highland Avenue; and La Cienega Boulevard and Century Boulevard. The busiest intersection evaluated (Wilshire and Veteran) had a daily traffic volume of approximately 100,000 vehicles per day with LOS E in the morning peak hour and LOS F in the evening peak hour.

24-hour per day outdoor exposure and averaged over a 70-year lifetime. The incremental cancer risk from all hazardous substances emitted by all eight sources – assuming 24 hour-per-day outdoor exposure – is estimated as 20.5 in one million, and is above the SCAQMD threshold of 10 in one million. In addition to the 24-hour outdoor exposure scenario, the HRA evaluated a scenario where project occupants would spend 2 hours per day outside their residence and the remainder of the time inside the residence with the benefit of enhance air filtration with air filters of a Minimum Efficiency Rating Value (MERV) of 11 or higher. MERV 11 filters capable of removing approximately 73 percent of diesel particulate matter. For the scenario assuming 22 hours per day indoors and 2 hours per day of outdoors, the incremental cancer risk was calculated as 6.9 per million, which is below the SCAQMD threshold.

Non-carcinogenic risks were estimated by estimating health risks of each hazardous substance from each source to each target organ system for that substance; and then summing all the resulting ratios for each organ system. The sum, or hazard index, is considered to indicate a significant impact when the hazard index is 1.0 or greater. Two non-carcinogenic hazard indices were calculated: acute, for one-hour outdoor exposure; and chronic, for long-term outdoor exposure. The acute and chronic hazard indices for the 24-hour outdoor exposure scenario were 0.049 and 0.066, respectively; that is, below SCAQMD thresholds.

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

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

According to the SCAQMD's CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Proposed Project does not include any uses identified by the SCAQMD as being associated with odors and therefore would not produce objectionable odors. As such, the Proposed Project would have no impact related to objectionable odors. This would be consistent with what was identified in SEIR No. 330; therefore, the Proposed Project would not create a new significant impact or a substantial increase in the severity of previously identified effects.

Overall, the Proposed Project would be consistent with the Approved Project as analyzed in the Certified EIR. Therefore, the Proposed Project would not create a new significant impact or a substantial increase in the severity of previously identified effects. No changes or new information would require preparation of a subsequent EIR.

5.3.3 Adopted Mitigation Measures Applicable to the Proposed Project

The following mitigation measures from the Updated and Modified MMP No. 122A for the Approved Project are applicable to the Proposed Project and incorporated into MMP No. 347. Clarifying language added to MM 5.2-7 as a result of the findings of the HRA, required by said mitigation measure, are shown in underline.

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Construction

MM 5.2-1 Prior to the issuance of grading permits, the property owner/developer shall include a note on all grading plans which requires the construction contractor to implement the following measures during grading. These measures shall also be discussed at the pre-grade conference.

- Use low emission mobile construction equipment.
- Maintain construction equipment engines by keeping them tuned.
- Use low sulfur fuel for stationary construction equipment.
- Utilize existing power sources (i.e., power poles) when feasible.
- Configure construction parking to minimize traffic interference.
- Minimize obstruction of through-traffic lanes. When feasible, construction should be planned so that lane closures on existing streets are kept to a minimum.
- Schedule construction operations affecting traffic for off-peak hours.
- Develop a traffic plan to minimize traffic flow interference from construction activities (the plan may include advance public notice of routing, use of public transportation and satellite parking areas with a shuttle service).

Operation

MM 5.2-5 The City will encourage the incorporation of energy conservation techniques (i.e. installation of energy saving devices, construction of electric vehicle charging stations, use of sunlight filtering window coatings or double-paned windows, utilization of light-colored roofing materials as opposed to dark-colored roofing materials, and placement of shady trees next to habitable structures) in new developments.

MM 5.2-6 The City will encourage the incorporation of bus stands, bicycle racks, bicycle lanes, and other alternative transportation related infrastructure in new developments.

MM 5.2-7 Prior to the issuance of building permits, the property owner/developer for residential or residential mixed-use projects within: 1) 1,000 feet from the truck bays of an existing distribution centers that accommodate more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units, or where transport refrigeration unit operations exceed 300 hours per week; 2) 1,000 feet of an industrial facility which emits toxic air contaminants; or 3) 500 feet of Interstate 5 (I-5), State Route 91 (SR-91), State Route 57 (SR-57) or State Route 55 (SR-55), shall submit a health risk assessment (HRA) prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment (OEHHA) and the South Coast Air Quality Management District (SCAQMD).

The HRA shall be submitted to the Anaheim Planning Department prior to the issuance of building permits for any future residential or residential mixed-use project. If the HRA shows that the incremental cancer risk exceeds one in one hundred thousand (1.0E-05), or the appropriate noncancer hazard index exceeds 1.0, or if the PM₁₀ or PM_{2.5} ambient air quality standard exceeds 2.5 µg/m³, the HRA shall identify the level of high-efficiency Minimum Efficiency Reporting Value (MERV) filter required to reduce indoor air concentrations of pollutants to achieve the cancer and/or noncancer and/or ambient air quality threshold.

The HRA completed for the Proposed Project concluded that a MERV-11 filter shall be required to reduce indoor air concentrations of pollutants to achieve the cancer and/or noncancer and/or ambient air quality threshold. Heating, ventilation, and air conditioning systems for units that are installed with MERV-11 filters shall maintain positive pressure within the building's filtered ventilation system to reduce infiltration of unfiltered outdoor air. The property owner/developer shall be required to install high efficiency MERV-11 filters in the intake of residential ventilation systems, consistent with the recommendations of the HRA. Heating, air conditioning and ventilation (HVAC) systems shall be installed with a fan unit power designed to force air through the MERV filter. To ensure long-term maintenance and replacement of the MERV filters in the individual units, the following shall occur:

- a) Developer, sale, and/or rental representative shall provide notification to all affected tenants/residents of the potential health risk for affected units.
- b) For rental units, the owner/property manager shall maintain and replace MERV-11 filters in accordance with the manufacturer's recommendations. The property owner shall inform renters of increased risk of exposure to diesel particulates when windows are open.
- c) For residential owned units, the Homeowner's Association (HOA) shall incorporate requirements for long-term maintenance in the Covenant Conditions and Restrictions and inform homeowners of their responsibility to maintain the MERV-11 filter in accordance with the manufacturer's recommendations. The HOA shall inform homeowners of increased risk of exposure to diesel particulates when windows are open.
- d) For projects within 500 feet of the freeway, air intakes on residential buildings shall be placed as far from the freeway as possible.
- e) For projects within 500 feet of the freeway, the residential buildings should be designed to limit the use of operable windows and/or balconies on portions of the site adjacent to and facing the freeway.

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5.4 BIOLOGICAL RESOURCES

5.4.1 Summary of Previous Environmental Analysis

EIR No. 330 for the Update Project

EIR No. 330 concluded that implementation of the Update Project would include development of residential land uses in large vacant areas, which would adversely impact sensitive species through habitat loss and habitat modification. Buildout of the Update Project was identified as potentially impacting riparian areas and/or wetlands through development in the Hill and Canyon Area and along the Santa Ana River. Developments in the Hill and Canyon Area pursuant to the Update Project were identified as impacting wildlife movement in that area. EIR No. 330 concluded that implementation of the Update Project would comply with City tree preservation policies and the Orange County Central/Coastal Natural Communities Conservation Plan. Impacts to sensitive species, riparian areas, wetlands, and wildlife movement were identified as less than significant after implementation of mitigation, while the remaining impacts were identified as less than significant without mitigation.

SEIR No. 346 for the Rezoning Project

No further impacts to biological resources were identified in SEIR No. 346, as the proposed Rezoning Project was consistent with the Update Project, and development of those sites was envisioned in the Update Project.

5.4.2 Impacts Associated with the Proposed Project

Would the Proposed Project:

Environmental Issues	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstances Requiring Major EIR Revisions	New Information Showing New or Increased Significant Effects	Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?					X
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?					X

Environmental Issues	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstances Requiring Major EIR Revisions	New Information Showing New or Increased Significant Effects	Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
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?					X
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?					X
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?					X
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?					X

The Project Site is in a built-out portion of Anaheim that contains few biological resources. The Project Site is currently developed with commercial uses. The only biological resources on the Project Site are ornamental trees and shrubs, including street trees, near the east end of the site along East Street. The Project Site is not located with the plan area of an adopted habitat conservation plan and it is not subject to a local policy or ordinance protecting biological resources.

Comments:

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

No Impact. The Project Site does not contain habitat for candidate, sensitive, or special status species. Therefore, the Proposed Project would have no impact on these types of species. No impact would occur and no mitigation is necessary. Accordingly, no new significant impacts or impacts of greater severity than those previously identified in the Certified EIR would occur. No changes or new information would require preparation of a subsequent EIR.

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

No Impact. As analyzed in the SEIR No. 346, the Project Site does not contain riparian habitat or other sensitive natural community. Therefore, the Proposed Project would have no impact on these communities and no mitigation is necessary. Accordingly, no new significant impacts or impacts of greater severity than those previously identified in the Certified EIR would occur. No changes or new information would require preparation of a subsequent EIR.

- 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?**

No Impact. Wetlands are defined under the Federal Clean Water Act as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that normally does support, a prevalence of vegetation adapted to life in saturated soils. Wetlands include areas such as swamps, marshes, and bogs. The Project Site does not contain wetlands. Therefore, Proposed Project development would not adversely affect wetlands. No impact would occur and no mitigation is necessary. Accordingly, no new significant impacts or impacts of greater severity than those previously identified in the Certified EIR would occur. No changes or new information would require preparation of a subsequent EIR.

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

No Impact. The Project Site is not in a wildlife movement corridor and does not contain native wildlife nursery sites. Project development would not affect these types of biological resources. Project development would include removal of ornamental trees and shrubs in the eastern part of the site. Such trees and shrubs could be used for nesting by migratory birds protected under the federal Migratory Bird Treaty Act and California Fish and Game Code Section 3503. Implementation of Mitigation Measure 5.3-4 set forth in EIR No. 330 would reduce this impact to less than significant.

No new significant impacts or impacts of greater severity than those previously identified in the Certified EIR would occur. No changes or new information would require preparation of a subsequent EIR.

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

No Impact. The Anaheim City Council may designate landmark trees on public property; removal of landmark trees is prohibited without prior approval of the City Council (Anaheim Municipal Code Chapter 11.12). Removal or trimming of street trees is prohibited without first having secured written permission from the Director of Community Services or his or her designee (Anaheim Municipal Code Chapter 13.12).

The Project Site is not subject to a City tree preservation ordinance or other local regulation protecting biological resources. Project development would not conflict with these types of policies or ordinances and

no impact would occur. No mitigation is necessary. Accordingly, no new significant impacts or impacts of greater severity than those previously identified in the Certified EIR would occur. No changes or new information would require preparation of a subsequent EIR.

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

No Impact. The Project Site is in the Plan Area of the Orange County Transportation Authority M2 Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP), which encompasses all of Orange County. The NCCP/HCP was finalized by the OCTA Board of Directors in November 2016, after certification of SEIR No. 346. The Project Site is not in or near a preserve or restoration project established under the NCCP/HCP (OCTA 2014). No impact would occur and no changes or new information would require preparation of a subsequent EIR.

5.4.3 Adopted Mitigation Measures Applicable to the Proposed Project

The following mitigation measures from the Updated and Modified MMP No. 122A for the Approved Project are applicable to the Proposed Project and incorporated into MMP No. 347.

MM 5.3-3 If construction activity is timed to occur during the nesting season (typically between March 1 and July 1), developers will be required to provide focused surveys for nesting birds pursuant to California Department of Fish and Game requirements. Such surveys shall identify avoidance measures taken to protect active nests.

MM 5.3-4 Removal of nonnative trees shall be permitted only outside the nesting season.

5.5 CULTURAL RESOURCES

5.5.1 Summary of Previous Environmental Analysis

EIR No. 330 for the Update Project

EIR No. 330 concluded that the Update Project would not result in significant cultural resources impacts related to historical resources, archaeological resources, and paleontological resources upon implementation of regulatory requirements, General Plan goals and policies, and mitigation measures identified MMP No. 122 as listed in Section 5.5.3 of this Addendum.

SEIR No. 346 for the Rezoning Project

SEIR No. 346 determined that the Rezoning Project would be consistent with land use designations identified for those sites in the Update Project, and because EIR No. 330 already contemplated buildout of the housing opportunity sites proposed by the Rezoning Project, impacts to cultural resources would not be greater than identified under the EIR No. 330.

5. Environmental Analysis

5.5.2 Impacts Associated with the Proposed Project

Would the Proposed Project:

Environmental Issues	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstances Requiring Major EIR Revisions	New Information Showing New or Increased Significant Effects	Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?				X	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?				X	
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X	
d) Disturb any human remains, including those interred outside of formal cemeteries?				X	

The Project Site is in the Anaheim Colony Historic District. The two buildings onsite were built between 1953 and 1963 based on review of historic aerial photographs (NETR 2017). The site is shown cultivated with an orchard in the 1953 aerial photograph. The site is shown as vacant on a 1935 topographic map; East Street and South Street are present; one building is present on the site of the existing gas station abutting the south side of the project site; and an Atchison Topeka & Santa Fe (now OCTA) railroad track is shown about 800 feet west of the site (USGS 1935). The site is shown as vacant on a 1901 topographic map (USGS 1901).

Thus, the two buildings are over 50 years old. Both buildings onsite are single-story constructed of cement block. The front of the 633 South East Street building consists of wood panel and stone veneers, windows, and a door. Neither building is listed on the National Register of Historic Places (NRHP), and the Project Site is not in a National Historic District (NPS 2017). Neither building is listed as a California State Historic Landmark or as a California Point of Historical Interest (OHP 2017). A 140-acre portion of the Anaheim Colony Historic District, 0.4 miles northwest of the Project Site, is designated the Kroger-Melrose National Historic District (NPS 2017). Neither building is listed by the City of Anaheim as a contributing structure to the Colony Historic District; a Qualified Historical Structure; a Citywide Historically Significant Structure; or a Citywide Structure of Historical Interest (Anaheim 2016a).⁴ The owner of the site does not participate in the Mills Act Program, under which property taxes may be reduced in exchange for owners restoring their building exteriors and maintaining them in historically accurate condition (Anaheim 2016b).

⁴ A Qualified Historical Structure qualifies for participation in the Mills Act Program, under which property taxes may be reduced in exchange for owners restoring their building exteriors and maintaining them in historically accurate condition.

Comments:

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

Less than Significant Impact. The Project Site is in the Anaheim Colony Historic District. The two industrial buildings onsite were built between 1953 and 1963. The buildings have not been identified by the City of Anaheim as historical structures, and are not listed on the NRHP or as State Historical Landmarks or State Points of Historical Interest. Project development would include demolition of both structures onsite. There are no significant historical structures onsite, and impacts would be less than significant. Redevelopment of the project site with residential uses was analyzed in the Certified EIR. No changes or new information would require preparation of a subsequent EIR.

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

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. The Project Site is currently developed and not known to contain important archaeological resources. It is assumed here that implementation of the Approved Project on the Project Site would have involved grading and excavation to generally similar depths than would be required for the Proposed Project. Thus, no substantial incremental impact on buried archaeological resources would occur. Mitigation measures 5.4-2 and MM 5.4-3 from MMP 122A from the Certified EIR also apply to the Proposed Project. Therefore, no changes or new information would require preparation of a subsequent EIR.

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

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. The Project Site is currently developed and not known to contain important paleontological resources. The Project Site is not underlain by a rock formation noted in EIR No. 330 as being fossil-bearing. The Proposed Project is not expected to involve a substantial increase in depth of grading or excavation compared to implementation of the Approved Project, as explained in Section 5.5.2.b above. MM 5.4-2 and MM 5.4-3 from the Certified EIR also apply to the Proposed Project. Therefore, no changes or new information would require preparation of a subsequent EIR.

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

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. The Project Site is currently developed and not expected to contain any human remains. California Health and Safety Code Section 7050.5 requires that in the event that human remains are discovered within the project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes or has reason to believe the human remains to be

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those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. The project would comply with existing law, and potential impacts to human remains would be less than significant. As a result, the Proposed Project would not create a new significant impact or a substantial increase in the severity of previously identified effects related to cultural resources.

5.5.3 Adopted Mitigation Measures Applicable to the Proposed Project

The following mitigation measures from the Updated and Modified MMP No. 122A for the Approved Project are applicable to the Proposed Project and incorporated into MMP No. 347.

MM 5.4-2 City staff shall require property owners/developers to provide studies to document the presence/absence of archaeological and/or paleontological resources for areas with documented or inferred resource presence. On properties where resources are identified, such studies shall provide a detailed mitigation plan, including a monitoring program and recovery and/or in situ preservation plan, based on the recommendations of a qualified specialist.

MM 5.4-3 All archaeological resources shall be subject to the provisions of CEQA (Public Resources Code) Section 21083.2.

5.6 GEOLOGY AND SOILS

5.6.1 Summary of Previous Environmental Analysis

EIR No. 330 for the Update Project

EIR No. 330 determined that the Update Project would not expose future residents to hazards from groundshaking, liquefaction, expansive soils, landslides, erosion, and loss of topsoil provided that the General Plan goals and policies, existing codes and regulations, and MM 5.5-1 are implemented.

SEIR No. 346 for the Rezoning Project

SEIR No. 346 concluded that upon implementation of regulatory requirements and General Plan goals and policies and MM 5.5-1, the Rezoning Project would not result in significant impacts related to geology and soils. Because the EIR No. 330 contemplated development of the housing opportunity sites for residential and mixed uses, impacts related to geology and soils resulting from the Rezoning Project was determined to be less than significant.

5.6.2 Impacts Associated with the Proposed Project

The information in this Section is based partly on the Geotechnical Due-Diligence Investigation, Proposed Multi-Family Residential Development, 711 S. East Street, Anaheim, California by Albus-Keefe & Associates, Inc. dated August 11, 2016. A complete copy of this report is included as Appendix B to this Addendum.

Would the Proposed Project:

Environmental Issues	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstances Requiring Major EIR Revisions	New Information Showing New or Increased Significant Effects	Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
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.					X
ii) Strong seismic ground shaking?				X	
iii) Seismic-related ground failure, including liquefaction?				X	
iv) Landslides?					X
b) Result in substantial soil erosion or the loss of topsoil?				X	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				X	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (2013), creating substantial risks to life or property?				X	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?					X

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Comments:

- 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. The Alquist-Priolo Earthquake Fault Zoning Act requires the state geologist to delineate earthquake fault zones along faults that are “sufficiently active” and “well defined.” The act requires that cities and counties withhold development permits for sites in an earthquake fault zone until geologic investigations demonstrate that the sites are not threatened by surface displacements from future faulting. Pursuant to this act, structures for human occupancy are not allowed within 50 feet of the trace of an active fault. Active faults are those showing surface expression of displacement within about the last 11,000 years. There are no Alquist-Priolo Earthquake Fault Zones in the City of Anaheim. The Proposed Project would not expose people or buildings to hazards from surface rupture of a known active fault, and no impact would occur. No changes or new information would require preparation of a subsequent EIR.

ii) **Strong seismic ground shaking?**

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. As disclosed in the Certified EIR, the principal seismic hazard to the site is ground shaking resulting from an earthquake occurring along any of several major active and potentially active faults in southern California. Eight faults within 10 miles of the project site identified in the Geotechnical Report are listed below with their distances from the project site:

- The Puente Hills (Coyote Hills) fault, 3.1 miles
- Five segments of the Elsinore Fault Zone, each 7.4 miles
- San Joaquin Hills, 9.4 miles
- Puente Hills (Santa Fe Springs), 9.75 miles

The peak ground acceleration onsite with a two percent chance of exceedance in 50 years – that is, an average return period of 2,475 years – is 0.528g, where g is the acceleration of gravity. Ground acceleration of 0.528g corresponds to an intensity of VIII on the Modified Mercalli Intensity (MMI) Scale (Wald et. al. 1999), a subjective scale of how earthquakes are felt by people and the effects of earthquakes on buildings. The MMI Scale is a 12-point scale where Intensity I earthquakes are generally not felt by people; in Intensity XII earthquakes damage is total, and objects are thrown into the air (USGS 2017).

In an intensity VIII earthquake, damage is slight in specially designed structures; considerable damage occurs in ordinary substantial buildings with partial collapse; and damage is great in poorly built

structures. Chimneys, factory stacks, columns, monuments, and walls fall, and heavy furniture is overturned (USGS 2017).

Structures for human occupancy must be designed to meet or exceed California Building Code (CBC) standards for earthquake resistance. The CBC contains provisions for earthquake safety based on factors including occupancy type, the types of soil and rock onsite, and the strength of ground motion with a specified probability at the site. The CBC is updated on a three-year cycle; the 2016 CBC took effect on January 1 2017. The geotechnical investigation for the project would calculate seismic design parameters, pursuant to CBC requirements, that must be used in the design of the proposed building.

Therefore, impacts would be less than significant and no impacts of greater severity than those previously identified in the Certified EIR would occur. Preparation of a subsequent EIR would not be necessary.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. Liquefaction refers to loose, saturated sand or silt deposits that behave as a liquid and lose their load-supporting capability when strongly shaken. Loose granular soils and silts that are saturated by relatively shallow groundwater are susceptible to liquefaction. No groundwater was encountered in three borings to depths of up to 36.5 feet below ground surface (bgs) conducted as part of the geotechnical investigation for the project. Historical high groundwater under the site is more than 50 feet deep. The project site is not in a Zone of Required Investigation for Liquefaction mapped by the California Geological Survey. Therefore, liquefaction potential beneath the site is considered to be very low. However, as with the Certified EIR, compliance with the regulatory requirements and General Plan goals and policies, and implementation of MM 5.5-1 would ensure that impacts related to ground failure are reduced to a less than significant level. No impacts of greater severity than those previously identified in the Certified EIR would occur. Preparation of a subsequent EIR would not be necessary.

iv) Landslides?

No Impact. The site is not in a Zone of Required Investigation for Earthquake-Induced Landslides mapped by the California Geologic Survey (CGS). No impacts of greater severity than those previously identified in the Certified EIR would occur. Preparation of a subsequent EIR would not be necessary.

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

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. Due to the location of the Project Site within a relatively flat and developed area, the Proposed Project is not anticipated to result in substantial erosion or loss of topsoil. The Project Site is currently developed and covered with impervious surfaces, including buildings, concrete, and paving. Once construction is complete, the project site shall comply with best management practices (BMPs) identified in the preliminary water quality management plan prepared for the Proposed Project – included as Appendix D to this Addendum – to reduce erosion effects to less than significant levels, as discussed in Section 5.9, *Hydrology and Water Quality*, of this Addendum. Furthermore, construction activities would be performed pursuant to the current

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National Pollutant Discharge Elimination System permit requirements. Therefore, no impacts of greater severity than those previously identified in the Certified EIR would occur. Preparation of a subsequent EIR would not be necessary.

- 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/No Changes or New Information Requiring Preparation of an EIR.

Liquefaction and Lateral Spreading

Liquefaction potential under the site is considered very low, as substantiated above in Section 5.6.2.a.iii of this Addendum. Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The potential for lateral spreading onsite is estimated to be very low, due to the very low potential for liquefaction under the site.

Landslides

Landslides are not anticipated at the site (see Section 5.6.2.a.iv of this Addendum).

Subsidence

The major cause of ground subsidence is the excessive withdrawal of groundwater. The project site sits above the Main Orange County Groundwater Basin (Basin). The OCWD manages groundwater levels in the Basin within a specified operating range pursuant to state law. Thus, there is little potential for considerable future subsidence in the Basin (OCWD 2015). Project development would not subject workers, visitors, or structures to substantial hazards arising from ground subsidence. No impacts of greater severity than those previously identified in the Certified EIR would occur. Preparation of a subsequent EIR would not be necessary.

Collapsible Soils

Collapsible soils shrink upon being wetted and/or being subject to a load. Existing site soils to a depth of about three feet bgs were determined to be unsuitable to support the proposed residences. Removal of such soils – that is, artificial fill soils plus the uppermost one foot of underlying alluvial soils – and replacement with engineered, moistened, and compacted fill soils is recommended in the project geotechnical report. Project design, grading, and construction would comply with the aforementioned recommendations. Project development would not subject people or structures to substantial hazards from collapsible soils. No impacts of greater severity than those previously identified in the Certified EIR would occur. Preparation of a subsequent EIR would not be necessary.

- d) Be located on expansive soil, as defined in Table 19-1-B of the Uniform Building Code (2013), creating substantial risks to life or property?**

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

Near-surface site soils are expected to have a very low expansion potential. The geotechnical report recommends additional testing for expansion potential before rough grading and again before construction of foundations and concrete flatwork. Project site grading would comply with the aforementioned recommendations, and project development would not expose people or structures to substantial hazards arising from expansive soils. No impacts of greater severity than those previously identified in the Certified EIR would occur. Preparation of a subsequent EIR would not be necessary.

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

No Impact. As under the Approved Project, implementation of the Proposed Project would not involve the construction or use of septic tanks or other alternative wastewater disposal system. Project development would involve construction of sewer laterals connecting to existing sewer mains. No impact would occur and no changes or new information would require preparation of a subsequent EIR.

5.6.3 Adopted Mitigation Measures Applicable to the Proposed Project

The following mitigation measures from the Updated and Modified MMP No. 122A for the Approved Project are applicable to the Proposed Project and incorporated into MMP No. 347. Clarifying language added to MM 5.5-1 as a result of the geotechnical investigation, required by said mitigation measure, is shown in underline.

MM 5.5-1 The City shall require geologic and geotechnical investigations in areas of potential seismic or geologic hazards as part of the environmental or development review process. All grading operations will be conducted in conformance with the recommendations contained in the applicable geotechnical investigation.

The requirement for a geotechnical investigation set forth in this mitigation measure has been satisfied by the completion of the geotechnical investigation report for the Proposed Project included as Appendix B to the Addendum prepared for the Proposed Project. All grading operations shall comply with recommendations of the aforementioned report. Proof of intent to comply with these operations, such as applicable notes on plans, shall be provided by the Property Owner/Developer prior to issuance of grading permits.

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5.7 GREENHOUSE GAS EMISSIONS

5.7.1 Summary of Previous Environmental Analysis

EIR No. 330 for the Update Project

EIR No. 330 did not evaluate greenhouse gas (GHG) emissions impacts because, prior to Senate Bill 97 which went into effect January 1, 2010, this was not included in the CEQA Guidelines Appendix G checklist and the City did not have adopted thresholds at the time of preparation.

SEIR No. 346 for the Rezoning Project

SEIR No. 346 determined that the Approved Project would be consistent with applicable state and regional GHG reduction plans which include the California Air Resources Board (CARB) Scoping Plan and the Southern California Association of Government's (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). However, even with incorporation of mitigation (MM 5.2-2 through MM 5.2-12), the Approved Project was determined to have significant and unavoidable regarding GHG emissions impacts. A Statement of Overriding Considerations was adopted related to GHG emissions impacts.

5.7.2 Impacts Associated with the Proposed Project

Greenhouse Gases and Climate Change

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as GHG, to the atmosphere. The primary source of these GHG is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHG—water vapor, CO₂, methane (CH₄), and O₃—that are the likely cause of an increase in global average temperatures observed in the 20th and 21st centuries. Other GHG identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N₂O), sulfur hexafluoride (SF₆), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons (IPCC 2001).^{5,6}

The regulatory settings for the Proposed Project have changed since the certification of SEIR No. 346. The following discussion is provided to update conditions relative to development of the Proposed Project.

⁵ Water vapor (H₂O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant.

⁶ Black carbon is the most strongly light-absorbing component of PM emitted from burning fuels. Black carbon contributes to climate change both directly, by absorbing sunlight, and indirectly, by depositing on snow (making it melt faster) and by interacting with clouds and affecting cloud formation. Reducing black carbon emissions globally can have immediate economic, climate, and public health benefits. California has been an international leader in reducing emissions of black carbon, with close to 95 percent control expected by 2020 due to existing programs that target reducing PM from diesel engines and burning activities (CARB 2013).

Regulatory Setting

Executive Order B-30-15

Executive Order B-30-15, signed April 29, 2015, sets a goal of reducing GHG emissions within the state to 40 percent of 1990 levels by year 2030. Executive Order B-30-15 also directs CARB to update the Scoping Plan to quantify the 2030 GHG reduction goal for the state and requires state agencies to implement measures to meet the interim 2030 goal of Executive Order B-30-15 as well as the long-term goal for 2050 in Executive Order S-03-05. It also requires the Natural Resources Agency to conduct triennial updates of the California adaptation strategy, “Safeguarding California,” in order to ensure climate change is accounted for in state planning and investment decisions.

Senate Bill 32 and Assembly Bill 197

In September 2016, Governor Brown signed Senate Bill 32 (SB 32) and Assembly Bill 197 (AB 197) into law, making the Executive Order goal for year 2030 into a statewide mandated legislative target. AB 197 established a joint legislative committee on climate change policies and requires the CARB to prioritize direction emissions reductions rather than the market-based cap-and-trade program for large stationary, mobile, and other sources.

2017 Climate Change Scoping Plan Update

Executive Order B-30-15 and SB 32 required CARB to prepare another update to the Scoping Plan to address the 2030 target for the state. On January 20, 2017, CARB released the *Draft 2017 Climate Change Scoping Plan Update* with adoption hearings planned for June of 2017. The *Draft 2017 Climate Change Scoping Plan Update* includes the potential regulations and programs, including strategies consistent with AB 197 requirements, to achieve the 2030 target. The *Draft 2017 Scoping Plan* establishes a new emissions limit of 260 MMTCO_{2e} for the year 2030, which corresponds to a 40 percent decrease in 1990 levels by 2030 (CARB 2017a).

California’s climate strategy will require contributions from all sectors of the economy, including the land base, and will include enhanced focus on zero- and near-zero emission (ZE/NZE) vehicle technologies; continued investment in renewables, including solar roofs, wind, and other distributed generation; greater use of low carbon fuels; integrated land conservation and development strategies; coordinated efforts to reduce emissions of short-lived climate pollutants (methane, black carbon, and fluorinated gases); and an increased focus on integrated land use planning, to support livable, transit-connected communities and conservation of agricultural and other lands. Requirements for direct GHG reductions at refineries will further support air quality co-benefits in neighborhoods, including in disadvantaged communities historically located adjacent to these large stationary sources, as well as efforts with California’s local air pollution control and air quality management districts (air districts) to tighten emission limits on a broad spectrum of industrial sources.

The *2017 Climate Change Scoping Plan* also identified local governments as essential partners in achieving the State’s long-term GHG reduction goals and identified local actions to reduce GHG emissions. As part of the recommended actions, CARB recommends that local governments achieve a community-wide goal to achieve emissions of no more than 6 MTCO_{2e} or less per capita by 2030 and 2 MTCO_{2e} or less per capita by 2050.

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For CEQA projects, CARB states that lead agencies may develop evidenced-based bright-line numeric thresholds—consistent with the Scoping Plan and the State’s long-term GHG goals—and projects with emissions over that amount may be required to incorporate on-site design features and mitigation measures that avoid or minimize project emissions to the degree feasible; or, a performance-based metric using a climate action plan or other plan to reduce GHG emissions is appropriate (CARB 2017a).

Modeling Methodology

SCAQMD’s most recent air quality analysis model, CalEEMod Version 2016.3.1., was utilized to compare the impacts of the Proposed Project to that identified in the SEIR No. 346. GHG modeling results are included in Appendix A.

Would the Proposed Project:

Environmental Issues	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstances Requiring Major EIR Revisions	New Information Showing New or Increased Significant Effects	Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?				X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				X	

Comments:

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

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

A project does not generate enough GHG emissions on its own to influence global climate change; therefore, GHG emissions impacts are a measure of a project’s contribution to the cumulative environmental impact.

The Proposed Project would contribute to global climate change through direct emissions of GHG from onsite area sources and vehicle trips generated by the Project, and indirectly through offsite energy production required for onsite activities, water use/wastewater generation, and waste disposal. Annual GHG emissions were calculated for operation of the Proposed Project (see Appendix A) and compared to emissions associated with the Approved Project identified in the Certified EIR. GHG emissions associated with the Proposed Project are shown in Table 5, *Operational Phase GHG Emissions*. As shown in the table, the Proposed Project at buildout would generate 527 MTCO_{2e} of GHG emissions per year. In the table, Citywide

GHG emissions under the Approved Project are shown for reference. As compared to the Approved Project, the Proposed Project would increase GHG emissions by approximately 24 percent due to the 10-unit increase. However, the total GHG emissions generated from either the Approved Project or Proposed Project would not exceed SCAQMD Working Group's bright-line threshold of 3,000 MTCO_{2e}. Consequently, the Proposed Project would not result in an increase in the severity of any previously identified significant impacts compared to those identified in the Certified EIR. Therefore, the Proposed Project would not create a new significant impact or a substantial increase in the severity of previously identified effects. No changes or new information would require preparation of a subsequent EIR.

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

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

CARB Scoping Plan

In accordance with Assembly Bill 32 (AB 32), CARB developed the 2008 Scoping Plan to outline the state's strategy to achieve 1990 level emissions by year 2020. The CARB Scoping Plan is applicable to state agencies and is not directly applicable to cities/counties and individual projects. Nonetheless, the Scoping Plan has been the primary tool used to develop performance-based and efficiency-based CEQA criteria and GHG reduction targets for climate action planning efforts. On January 20, 2017, CARB released the Draft 2017 Climate Change Scoping Plan to address the new interim GHG emissions target under Senate Bill 32 (SB 32), which requires the state to reduce its greenhouse gas emissions 40 percent below 1990 levels by 2030. The Draft 2017 Climate Change Scoping Plan has adoption hearings planned for June 2017 and provides the strategies for the state to meet the 2030 GHG reduction target under SB 32.

The statewide GHG emissions reduction measures that are being implemented, including requirements to improve building energy performance, would reduce the Proposed Project's GHG emissions. The proposed buildings would meet the current Building and Energy Efficiency Standards, which became effective January 1, 2017. The 2016 Standards are 33.5 percent more energy efficient than the 2008 standards for non-residential buildings. In addition, the Proposed Project would also be constructed in conformance with the California Green Building Standards Code (CALGreen), which requires high-efficiency water fixtures for indoor plumbing and water-efficient irrigation systems. The Proposed Project would comply with these GHG emissions reduction measures, since they are statewide strategies. However, the Scoping Plan itself is not directly applicable to the Proposed Project. Therefore, the Proposed Project would not obstruct implementation of the CARB Scoping Plan, and impacts would be less than significant.

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Table 5 Operational Phase GHG Emissions

Source	GHG Emissions	
	MTCO ₂ e ¹	Percent Change
City-wide Emissions Identified in SEIR No. 346¹		
Area	57,458	45%
Energy	1,869,058	15%
Mobile	1,776,187	33%
Solid Waste	86,928	2%
Water	139,692	4%
Construction-Amortized ⁴	n/a	n/a
Total All Sector	3,929,323	100%
SCAQMD Bright-Line Threshold	3,000 MTCO ₂ e	n/a
Exceeds Threshold?	Yes	n/a
Proposed Project²		
Area	1	0%
Energy ³	193	37%
Mobile	281	53%
Solid Waste	10	2%
Water	34	6%
Construction-Amortized ⁴	9	2%
Total All Sectors	527	100%
SCAQMD Bright-Line Threshold	3,000 MTCO ₂ e	n/a
Exceeds Threshold?	No	n/a

Note: Totals may not equal 100 percent due to rounding.

¹ Anaheim 2013, Table 5.2-5, Proposed Project's 2035 GHG Emissions Inventory Compared to the 2004 Approved Project.

² CalEEMod, Version 2016.3.1. Based on year 2019 emissions (Proposed Project buildout)

³ The 2016 Standards are 28% more energy efficient for residential buildings than the 2013 Building and Energy Efficiency Standards.

⁴ Construction emissions are amortized over a 30-year project lifetime per recommended SCAQMD methodology.

SCAG RTP/SCS

SCAG's 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategies (RTP/SCS) was adopted April 7, 2016. SCAG's RTP/SCS identifies that land use strategies that focus on new housing and job growth in areas served by high quality transit and other opportunity areas would be consistent with a land use development pattern that supports and complements the proposed transportation network. The overarching strategy in the 2016-2040 RTP/SCS is to provide for a plan that allows the southern California region to grow in more compact communities in existing urban areas; provide neighborhoods with efficient and plentiful public transit and abundant and safe opportunities to walk, bike, and pursue other forms of active transportation; and preserve more of the region's remaining natural lands (SCAG 2016). The Proposed Project involves development of 42 townhomes onsite, a net increase of 10 units from Approved Project. Therefore, the Proposed Project would not affect the growth forecast for the City as assumed under the 2016-2040 RTP/SCS. Therefore, the Proposed Project would not interfere with SCAG's ability to implement the regional strategies outlined in the 2016-2040 RTP/SCS to achieve the GHG reduction goals and strategies for passenger vehicles.

Consequently, the Proposed Project would not create a new significant impact or a substantial increase in the severity of previously identified effects. No changes or new information would require preparation of a subsequent EIR.

5.7.3 Adopted Mitigation Measures Applicable to the Proposed Project

No mitigation measures related to greenhouse gas emissions that were identified in the Certified EIR are applicable to the Proposed Project.

5.8 HAZARDS AND HAZARDOUS MATERIALS

5.8.1 Summary of Previous Environmental Analysis

EIR No. 330 for the Update Project

EIR No. 330 concluded that the Update Project would involve a small increase in the number of residences next to railways and thus subject to hazards from transportation of hazardous materials by rail. Some commercial and industrial businesses in the City use or generate hazardous materials. Two former solid waste disposal sites are in the City. The use, storage, disposal, and transport of hazardous materials is regulated by several agencies. Impacts related to hazardous materials were identified as less than significant after compliance with existing regulations, General Plan goals and policies, and implementation of MM 5.6-1 through MM 5.6-3 of the Certified EIR.

Parts of the City were identified as being in airport land use plans of two airports, Fullerton Municipal Airport and the Los Alamitos Joint Forces Training Base. Hazards related to the two airports were determined to be less than significant after implementation of MM 5.6-4 through MM 5.6-6 of the Certified EIR.

The part of the City east of SR-55 and south of SR-91 was identified as subject to wildfire hazards; this impact was identified as less than significant after implementation of the General Plan policies.

SEIR No. 346 for the Rezoning Project

SEIR No. 346 concluded that upon compliance with the existing regulatory requirements and General Plan goals and policies, implementation of MM 5.6-1 through MM 5.6-6, buildout of the Rezoning Project would not result in significant impacts related to hazards and hazardous materials.

5.8.2 Impacts Associated with the Proposed Project

The information in this Section is based in part on the Phase I and II Environmental Site Assessment (ESA), 633 and 711 South East St, Anaheim, California by Stantec Consulting Services Inc. dated August 12, 2016; a complete copy of this Report is included as Appendix C to this Addendum.

Would the Proposed Project:

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Environmental Issues	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstances Requiring Major EIR Revisions	New Information Showing New or Increased Significant Effects	Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				X	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?					X
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?					X
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?					X
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?					X

EIR No. 330 and SEIR No. 346 were both programmatic-level documents, citywide in scope; neither involved detailed site-specific investigation for hazardous materials or other hazards. Phase I and Phase II ESAs were completed for the project site by Stantec Consulting Services Inc. on August 12, 2016.

Phase I Environmental Site Assessment

Historical Uses of Project Site

The Property and surrounding area has been utilized for industrial purposes since the late 1950s. These uses are believed to have included the use of hazardous materials such as fuels, solvents, and petroleum products. Two features of significance were identified in a 1959 aerial photograph. These features included 1) a concrete slab visible at the southwest portion of the building, and 2) a dark black square feature visible in the southwest portion of the Property that resembles a mud pit or earthen sump. Although there is no other evidence (*i.e.*, city/county records, interviews, or visual evidence) to support the presence of an underground storage tank (UST) or sumps at the Property, the concrete pad resembles the approximate size of a UST pad and the dark black square resembles a mud pit or earthen sump.

The project site appears to have been cultivated as an orchard in aerial photographs dated 1938 and 1953; the density of trees is somewhat reduced in the 1953 photograph compared to 1938.

Regulatory Agency Environmental Database Listings

The project site was listed on the following regulatory agency environmental databases:

- ECHO: Enforcement and Compliance History Information: US Environmental Protection Agency (USEPA)
- Haznet: hazardous waste shipment manifests: California Department of Toxic Substances Control (DTSC)
- Resource Conservation and Recovery Act (RCRA) NonGen/NLR (Non-Generator, No Longer Regulated): USEPA

These listings are for the storage and disposal off-site of off-specification, aged, or surplus organics and laboratory waste chemicals. No violations were reported for the hazardous wastes. No additional information regarding these listings was provided in the environmental database report.

The Phase I ESA identified the following issues potentially affecting the project site:

- Historic industrial uses
- The concrete slab, about the size of a UST pad
- The dark black square visible in the 1959 aerial photograph, resembling a mud pit or earthen sump
- Potential historic agricultural use
- Adjacent gasoline station: The Thrifty Oil #364 / Arco #9730 station (727 South East Street, next to the south site boundary had a gasoline release to soil. The case was closed in 2003; however, the station

5. Environmental Analysis

remains active. Due to the absence of soil vapor sampling data for the Property, collecting soil and soil vapor samples along the southern boundary line for TPH and VOCs was recommended to evaluate whether a release has occurred at this location above regulatory thresholds or health risk criteria for residential use.

Lead-Based Paint

Lead was formerly used as an ingredient in paint (before 1978) and as a gasoline additive; both of these uses have been banned. Lead is listed as a reproductive toxin and a cancer-causing substance; it also impairs the development of the nervous system and blood cells in children (DTSC 2010). Lead-based paint is defined in Code of Federal Regulations Title 40 Part 745 as paint or other surface coatings that contain lead equal to or in excess of 1.0 milligram per square centimeter or 0.5 percent by weight. Those demolishing pre-1978 structures may presume the buildings contain lead-based paint (LBP) without having an inspection for LBP. Lead must be contained during demolition activities (California Health & Safety Code sections 17920.10 and 105255). Title 29 Code of Federal Regulations (CFR) Part 1926 establishes standards for occupational health and environmental controls for lead exposure. The standard also includes requirements addressing exposure assessment, methods of compliance, respiratory protection, protective clothing and equipment, hygiene facilities and practices, medical surveillance, medical removal protection, employee information and training, signs, recordkeeping, and observation or monitoring.

The buildings onsite were built in approximately 1963; thus, LBP is likely present in and/or on the structures. LBP must be removed from the site in accordance with applicable laws and regulations.

Asbestos

Asbestos is the name of a group of silicate minerals that are heat resistant, and thus were commonly used as insulation and fire retardant. Inhaling asbestos fibers has been shown to cause lung disease (asbestosis) and lung cancer (mesothelioma) (DTSC 2010). Beginning in the early 1970s, a series of bans on the use of certain asbestos-containing materials (ACMs) in construction were established by the EPA and the Consumer Product Safety Commission. Most US manufacturers voluntarily discontinued the use of asbestos in certain building products during the 1980s. Requirements for limiting asbestos emissions from building demolition and renovation activities are specified in SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities).

California Government Code Sections 1529 and 1532.1 provide for exposure limits, exposure monitoring, respiratory protection and good working practice by workers exposed to lead and asbestos-containing materials (ACM).

ACM could be present in and/or on buildings onsite. A pre-demolition ACM inspection; and abatement, containment, removal, and disposal of any ACM detected in amounts above regulatory thresholds, would be required per the aforementioned laws and regulations.

Petromat

The Property has an asphalt paved parking lot. A stress absorbing fabric (Petromat®) is sometimes used in asphalt paving. The tack coating often associated with this material sometimes contains asbestos. The asphalt onsite was inspected for ACM in the course of the Phase II ESA. Stress absorbing fabric was observed in the asphalt at all five boring locations on the 633 South East Street property, but not in the three borings at 711 South East Street. Trace amounts of asbestos (below one percent by weight) were detected in fabric samples. Construction materials containing concentrations of asbestos between 0.1 percent and one percent by weight are classified as asbestos-containing construction materials (ACCM). ACCM can be disposed of as non-hazardous waste; however, the contractor must be properly licensed to handle ACCM pursuant to the California Health and Safety Code 25915.

Phase II Environmental Site Assessment:

A Phase II Environmental Site Assessment – that is, sampling subsurface site soils and soil vapor from eight locations; testing samples for chemicals of concern; and a human health risk assessment based on test results – was conducted on the site to assess the five issues identified in the Phase I ESA.

Soil and Soil Vapor Sampling

Subsurface site soils and soil vapor were sampled from eight locations via borings drilled to four feet below ground surface (bgs) with a hand augur and then drilled from four to seven feet bgs with a direct push rig.

Testing

The following tests were performed on soil samples:

- Total Petroleum Hydrocarbons (TPH) via USEPA Method 8015
- Volatile Organic Compounds (VOCs) via USEPA Method 8260b: Naphthalene,
- Pesticides via USEPA Method 8081A
 - 4,4'-DDT (Dichlorodiphenyltrichloroethane), an organochlorine pesticide
 - 4,4'-DDE ([Dichlorodipenyldichloroethylene], an organochlorine contaminant, which is a biodegradation product of DDT
 - Dieldrin, an organochlorine pesticide
- Arsenic and lead via USEPA Method 6010B

Soil vapor was tested for Volatile Organic Compounds (VOCs) via USEPA Method 8260b, including naphthalene, 1,1,2-trichlorotrifluoroethane, benzene, and tetrachloroethylene (PCE)

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Test Results and Human Health Risk Assessment

Soil Samples

No gasoline was detected in soil samples; diesel fuel was detected in three samples at a maximum concentration of 29 mg/kg where one mg/kg is equivalent to one part per million. Oil was detected in three samples at maximum concentrations of 86 mg/kg. Petroleum hydrocarbon concentrations detected were below the Orange County Health Care Agency threshold of 100 mg/kg.

DDT, DDE, and dieldrin were each detected in one sample at concentrations of 0.0055, 0.011, and 0.022 mg/kg, respectively. Those concentrations are well below the USEPA Residential Screening Levels (RSLs) for those compounds of 1.9 mg/kg (DDT), 2.0 mg/kg (DDE), and 0.034 mg/kg for dieldrin.

Lead was detected at a maximum concentration of 16.8 mg/kg, below the DTSC Note 3 screening level of 80 mg/kg for residential use.

Arsenic was detected at a maximum concentration of 3.95 mg/kg, within the range considered to be naturally occurring in California.

In summary, no chemicals of concern were identified in soil samples at concentrations at or above regulatory screening levels for residential use.

Soil Vapor Samples

PCE was detected at five of the eight sampling locations at concentrations above the DTSC human health risk screening level of 480 $\mu\text{g}/\text{m}^3$ for residential use; the maximum concentration detected was 1,200 $\mu\text{g}/\text{m}^3$. The source of the PCE vapor is unknown; however, the Phase II ESA noted that the site is surrounded by several industrial land uses and thus the PCE could be from an offsite source(s). The project includes installation of vapor barrier membranes beneath the building foundations of all residential structures at the Site. The Phase II ESA considered such vapor barrier installation to be an effective method for addressing potential human health risks related to the potential for vapor intrusion into the proposed buildings, and did not recommend any further action or investigation regarding soil vapor onsite.

Comments:

- 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/No Changes or New Information Requiring Preparation of an EIR.

Hazardous Materials to be Used by the Project

Construction

Project construction would involve use of hazardous materials including fuels; oil, greases, and other lubricants; pesticides; paints; fertilizers; and solvents and other cleansers. Hazardous materials would be transported, used, stored, and disposed of per several existing regulations, including the Hazardous Materials

Transportation Act, the Resource Conservation and Recovery Act, the California Hazardous Waste Control Act, and the California Accidental Release Prevention Program. The construction contractor would maintain equipment and supplies for containing and cleaning up small hazardous materials spills, and would train workers in such containment and cleanup. The contractor would notify the Anaheim Fire and Rescue Hazardous Materials Section (HMS) immediately in the event of a hazardous materials release of amount and/or toxicity that could not be safely contained and cleaned up by onsite construction workers.⁷ Therefore, the use of hazardous materials during project construction would not pose substantial hazards to the public or the environment, and impacts would be less than significant.

Operation

Only small amounts of hazardous materials would be used in operation of the proposed residences, mostly for cleaning and maintenance purposes. Such hazardous materials would be used in compliance with the aforementioned laws and regulations. Thus, the use of hazardous materials during project operation would not cause substantial hazards to the public or the environment, and impacts would be less than significant.

Existing Hazardous Materials on and Near the Site

PCE

PCE was detected in soil vapor samples at concentrations up to 1,200 µg/m³, above the DTSC human health risk screening level of 480 µg/m³ for residential use. The highest concentration was found in the southwest corner of the project site. The source of the PCE is unknown but could be from industrial uses surrounding the site. The project includes installation of vapor barrier membranes beneath the building foundations of all residential structures at the Site. The Phase II ESA considered such vapor barrier installation to be an effective method for addressing potential human health risks related to the potential for vapor intrusion into the proposed buildings, and did not recommend any further action or investigation regarding soil vapor onsite.

ACM and ACCM

ACM could be present in and/or on buildings onsite. A pre-demolition ACM inspection; and abatement, containment, removal, and disposal of any ACM detected in amounts above regulatory thresholds, would be required per existing laws and regulations. Stress-absorbing fabric containing ACCM was observed in the asphalt parking lot on the 633 South East Street property. ACCM can be disposed of as non-hazardous waste; however, the contractor must be properly licensed to handle ACCM pursuant to the California Health and Safety Code 25915.

⁷ The Anaheim Fire and Rescue Hazardous Materials Section (HMS) is the Certified Unified Program Agency (CUPA) for Anaheim; the Certified Unified Program coordinates and makes consistent enforcement of several state and federal regulations governing hazardous materials.

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LBP

LBP is likely present in and/or on the structures onsite, which were built in approximately 1963. LBP must be removed from the site in accordance with applicable laws and regulations.

Conclusion

Construction of the Proposed Project would involve the use, transport, and disposal of small amounts of hazardous materials such as fuels, greases, and paints. The use, storage, transport, and disposal of hazardous materials by the project would be required to comply with existing regulations of several agencies, including the Department of Toxic Substances Control (DTSC), the EPA, the Occupational Safety & Health Administration (OSHA), and the Anaheim Fire & Rescue Hazardous Materials Section.⁸ Compliance with applicable laws and regulations governing the use, storage, and transportation of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner, and would minimize the potential for safety impacts to occur. Additionally, the hazardous materials use during construction would be temporary and would cease upon completion. Long-term operations of the Proposed Project would not involve routine transport, storage, use, and disposal of substantial amounts of hazardous materials. As discussed in the Certified EIR, the Proposed Project would not create a new significant impact or a substantial increase in the severity of previously identified effects. The Proposed Project would not require preparation of a subsequent EIR.

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/No Changes or New Information Requiring Preparation of an EIR.

Hazards from accidental release of hazardous materials would be less than significant, as substantiated above in Section 5.8.2.a. Small quantities of hazardous materials, such as fuels, greases, paints, and cleaning substances, may be used during project construction. This small amount would not pose a significant risk to the public or the environment if an onsite accident were to occur. Project construction contractors would maintain equipment and supplies for containing and cleaning up small hazardous materials spills; train construction workers on such containment and cleanup; and would notify Anaheim Fire & Rescue and the California Environmental Protection Agency immediately in the event of a release of hazardous materials to the ground or air. The risk of accidental releases of hazardous materials would not be greater than the severity of previously identified effects. The Proposed Project would not require preparation of a subsequent EIR.

⁸ The Anaheim Fire & Rescue Hazardous Materials Section is the Certified Unified Program Agency (CUPA) for the City of Anaheim; the Certified Unified Program coordinates and makes consistent enforcement of several state and federal regulations governing hazardous materials.

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

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

No existing or proposed schools are within 0.25 mile of the project site, and no impact would occur.

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

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

A regulatory environmental database search was conducted as part of the Phase I and II Site Assessments. The record search was performed to aid the identification of companies or facilities within a one-mile radius to the Project Site that might pose a potential threat to the surface environment at the Project Site.

Project Site

The project site was listed on the following databases:

- ECHO: Enforcement and Compliance History Information: US Environmental Protection Agency (USEPA)
- Haznet: hazardous waste shipment manifests: California Department of Toxic Substances Control (DTSC)
- Resource Conservation and Recovery Act (RCRA) NonGen/NLR (Non-Generator, No Longer Regulated): USEPA

These listings are for the storage and disposal off-site of off-specification, aged, or surplus organics and laboratory waste chemicals. No violations were reported for the hazardous wastes. No additional information regarding these listings was provided in the environmental database report. The Phase II ESA was conducted partly to determine whether hazardous materials are present in site soils or soil vapor, originating from a potential past onsite release, at levels above regulatory action levels for residential use.

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Nearby Properties

Hazardous materials sites near the project site discussed in the Phase I ESA are described below in Table 6.

Table 6 Hazardous Materials Sites Near the Proposed Project Site

Site Name Address	Database Reason for Listing Regulatory Status
Thrifty Oil 727 S East St Abuts south site boundary	Leaking Underground Storage Tank (LUST) Gasoline release affected soil Case closed 2003 This site was identified as a Recognized Environmental Condition (REC) for the Proposed Project site. ¹ The Phase II ESA for the project site included sampling and testing soil and soil vapor along the south project site boundary to determine whether a release has occurred at this location above regulatory screening levels for residential use. The Phase II identified PCE in soil vapor from under the Proposed Project site above the RSL for residential use. The source of the PCE was not determined.
	Permitted Underground Storage Tank (UST)
	Small quantity generator of hazardous wastes (SQG)
	Haznet: 1 shipment 2013
Orange County Stripping 1017 E South St 303 feet south	SQG
Dixco Diversified Chemical Sales 1014 E South St 364 feet south-southwest	LUST Chlorinated hydrocarbons affected drinking water aquifer Case closed 2001 This site was identified as an REC for the Proposed Project site. The Phase II ESA for the project site sampled and tested soil and soil vapor along the south project site boundary to determine whether a release has occurred at this location above regulatory screening levels for residential use. The Phase II identified PCE in soil vapor from under the Proposed Project site above the DTSC human health risk screening level for residential use. The source of the PCE was not determined.
	Permitted UST
	Hazardous Waste Transporter
Anaheim Plating & Polishing 928 E South St 556 feet south/southwest	Tiered Permit (hazardous waste facility) This site was identified as an REC for the Proposed Project site. The Phase II ESA for the project site sampled and tested soil and soil vapor along the south project site boundary to determine whether a release has occurred at this location above regulatory screening levels for residential use. The Phase II identified PCE in soil vapor from under the Proposed Project site above the RSL for residential use. The source of the PCE was not determined.
Hitachi Consumer Products 901 South	LUST Lead contamination affected soil Case closed 1990
	Permitted UST
	SQG
Flat & Vertical Concrete Saw 837 South East Street	LUST Gasoline release affected soil; case closed 1990
	Permitted UST
	Haznet: 2 shipments 2009

Table 6 Hazardous Materials Sites Near the Proposed Project Site

Site Name Address	Database Reason for Listing Regulatory Status
Dixco	Permitted UST
847 East St 772 feet south/southwest	Tiered Permit (hazardous waste facility) This site was identified as an REC for the Proposed Project site. See the description of the Phase II ESA above

¹ A recognized environmental condition (REC) is the presence or likely presence of any hazardous substance or petroleum products in, on, or at a property; due to release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment (ASTM 2013).

Sources: SWRCB 2017; DTSC 2017; USEPA 2017

The Phase II Environmental Site Assessment (ESA) described above assessed soil and soil vapor for potential contamination from the four sites identified as RECs for the Proposed Project site by the Phase I ESA. No soil contamination was identified at or above regulatory screening levels for residential use. PCE was identified at concentrations above the DTSC human health risk screening level of 480 µg/m³ for residential use. Per the recommendations in the Phase II ESA, the property owner/developer will install vapor barrier membranes beneath the building foundations of all residential structures at the Site. The Phase II ESA concluded that such membranes would effectively address potential human health risks related to the potential for vapor intrusion into the proposed buildings, and did not recommend any further action or investigation regarding soil vapor onsite.

Health Risks from Existing Air Emissions Near the Project Site

Since Certification of SEIR No. 346, the court has clarified that the purpose of an environmental evaluation is to identify the significant effects of the Proposed Project on the environment, not the significant effects of the environment on the Proposed Project (*California Building Industry Association v. Bay Area Air Quality Management District* [2015] 62 Cal.4th 369 [Case No. S213478]). CEQA does not require an analysis of the Proposed Project’s environmental effects on potential future sensitive receptors at a project site. However, a health risk assessment (HRA) has been prepared under a separate cover to satisfy this mitigation requirement of SEIR No. 346. The findings of the HRA are summarized in Section 5.3, *Air Quality*, of this Addendum. No revision of the Adopted Mitigation Measures Applicable to the Proposed Project for hazardous materials impacts – set forth in Section 5.8.3 of this Addendum– is required. Therefore, the findings of the HRA are not repeated here.

- e) **For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles or 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 in an adopted airport land use plan or within two miles of public-use airport. Project development would not expose people on the ground to substantial hazards arising from aircraft crashes. The Project Site is also not located within the vicinity of a private airstrip. The nearest heliport to the project site is the North Net Training Facility Heliport at 2400 East Oranewood Avenue in

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the City of Anaheim, about 2.4 miles to the south (Airnav.com 2017). No impact would occur and no changes or new information would require preparation of a subsequent EIR.

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 Project Site is not located in the vicinity of a private airstrip. Project development would not expose people on the ground to substantial hazards arising from aircraft crashes. The Project Site is also not located within the vicinity of a private airstrip. The nearest heliport to the project site is the North Net Training Facility Heliport at 2400 East Orangewood Avenue in the City of Anaheim, about 2.4 miles to the south (Airnav.com 2017). No impact would occur and no changes or new information would require preparation of a subsequent EIR.

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

No Impact. The Emergency Management and Preparedness Section of Anaheim Fire & Rescue is responsible for the management and oversight of the City of Anaheim's Emergency Operations Center, Disaster Preparedness, and Hazard Mitigation Plan (Anaheim 2017). The Anaheim Emergency Operations Plan was approved in 2008. The Draft Anaheim Hazard Mitigation Plan was completed in 2015. Construction activity would be confined to the Project Site and would not interfere with vehicle movement or emergency access along East Street. As detailed in Section 5.16, *Transportation and Traffic*, any impacts related to the addition of project-related traffic would be less than significant; therefore, the Proposed Project would not interfere with the movement of emergency vehicles along local roadways. The Proposed Project would not create a new significant impact or a substantial increase in the severity of previously identified effects. No new impact would occur and no changes or new information would require preparation of a subsequent EIR.

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. The Project Site is in a built-out portion of Orange County that is outside fire hazard severity zones designated by the California Department of Forestry and Fire Protection. No new impact would occur and no changes or new information would require preparation of a subsequent EIR.

5.8.3 Adopted Mitigation Measures Applicable to the Proposed Project

The following mitigation measures from the Updated and Modified MMP No. 122A for the Approved Project are applicable to the Proposed Project and incorporated into MMP No. 347. Clarifying language added to MM 5.6-3, as a result of the Phase I and Phase II Environmental Site Assessments, is shown in underline.

MM 5.6-1 Prior to the final building and zoning inspections for any residential project within 1,000 feet of a use that has the potential to release substantial amounts of airborne hazardous materials (determined to be "Category 1, 2, or 3" hazardous materials), the project property

owner/developer shall submit a shelter-in-place program to the Planning Director for review and approval. The shelter-in-place program shall require the property owner/developer to purchase a subscription to a service that provides “automated emergency notification” to individual residents (subject to meeting minimum standards set by the City) of the project. The shelter-in-place program shall include the following:

- The property owner/developer shall be required to purchase a minimum 10-year subscription to such a service that would include periodic testing (at least annually).
- The CC&Rs for each individual project shall require that each property owner and/or project Homeowners Association (HOA):
 - Maintain a subscription following expiration of the initial purchased subscription.
 - Maintain in a timely manner the database of resident phone numbers in conjunction with the service.
 - Provide appropriate agencies (police, fire, other emergency response as identified by the City) with information on how to activate the notification via the service provider.
- The CC&Rs for each individual project shall require that each resident provide the property owner/HOA with a current phone number for the residence and/or individual residents; this would include timely notification following the sale of a unit and would require notification if the unit were rented or leased or subject to any other change in occupancy.

MM 5.6-3 Prior to issuance of any discretionary permit for a current or former hazardous waste disposal site or solid waste disposal site, the project property owner/developer shall submit a Phase I Environmental Site Assessment to the City. If possible hazardous materials are identified during the site assessments, the appropriate response/remedial measures will be implemented in accordance with the requirements of the Orange County Health Care Agency (OCHCA) and/or the Regional Water Quality Control Board (RWQCB), as appropriate.

The requirement for a Phase I Environmental Site Assessment set forth in this mitigation measure has been satisfied by the completion of the Phase I and Phase II Environmental Site Assessments (ESAs) by Stantec Consulting Services Inc. on August 12, 2016 and included as Appendix C to the Addendum prepared for the Proposed Project. Per the recommendations in the Phase II ESA, the property owner/developer will install vapor barrier membranes beneath the building foundations of all residential structures at the Site. The Phase II ESA concluded that such membranes would effectively address potential human health risks related to the potential for vapor intrusion into the proposed buildings, and did not recommend any further action or investigation regarding soil vapor onsite. The

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property owner shall submit evidence of planned installation of said vapor barriers prior to issuance of building permits.

5.9 HYDROLOGY AND WATER QUALITY

5.9.1 Summary of Previous Environmental Analysis

EIR No. 330 for the Update Project

EIR No. 330 determined that the Update Project would increase generation of pollutants that could contaminate stormwater during both the construction and operational phases of projects developed pursuant to the Update Project. Water quality impacts were identified as less than significant after regulatory compliance.

EIR No. 330 concluded that existing drainage facilities in some parts of the City were identified as deficient. In addition, the eastern part of the Hill and Canyon Area was then undeveloped, thus requiring construction of drainage facilities in that area to serve future developments.

Small parts of the City – mostly within flood control channels and percolation basins – were identified as within 100-year flood zones mapped by the Federal Emergency Management Agency (FEMA).

Parts of the City were mapped in dam inundation areas of three dams: Prado Dam on the Santa Ana River in Riverside County about two miles east of the City boundary; Walnut Canyon Reservoir in the Hill and Canyon Area of the City; and Carbon Canyon Dam in the City of Brea about three miles north of the City. The Update Project contained flood mitigation policies that would reduce flood hazards in 100-year flood zones and dam inundation zones to less than significant.

SEIR No. 346 for the Rezoning Project

SEIR No. 346 concluded that upon compliance with the existing regulatory requirements and General Plan goals and policies, and implementation of MM 5.7-1 through MM 5.7-3, buildout of the Rezoning Project would not result in significant impacts related to hydrology and water quality.

5.9.2 Impacts Associated with the Proposed Project

The information in this Section is based on the following technical documents:

- Preliminary Water Quality Management Plan by C&V Consulting, Inc. dated December 2016; a complete copy of this report is included as Appendix D to this Addendum.
- Preliminary Hydrology Study, 711 S. East Street in the City of Anaheim, Tentative Tract Map No. 18088 by C&V Consulting, Inc. dated December 2016; a complete copy of this report is included as Appendix E to this Addendum.

Would the Proposed Project:

Environmental Issues	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstances Requiring Major EIR Revisions	New Information Showing New or Increased Significant Effects	Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
a) Violate any water quality standards or waste discharge requirements?				X	
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)??				X	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?				X	
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?				X	
e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?				X	
f) Otherwise substantially degrade water quality?				X	
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?					X
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?					X
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?				X	
j) Expose people or structures to inundation by seiche, tsunami, or mudflow?					X

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Environmental Issues	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstances Requiring Major EIR Revisions	New Information Showing New or Increased Significant Effects	Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
k) Substantially degrade water quality by contributing pollutants from areas of material storage, vehicle or equipment fueling, vehicle or equipment maintenance (including washing), waste handling, hazardous materials handling, or storage, delivery areas, loading docks or other outdoor work areas?				X	
l) Substantially degrade water quality by discharge which affects the beneficial uses (i.e., swimming, fishing, etc.) of the receiving waters?				X	

Comments:

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

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

A Preliminary Water Quality Management Plan (PWQMP) was prepared for the Proposed Project and is included in Appendix D, *Preliminary Water Quality Management Plan*, to this Addendum. The Project Site is in the Anaheim Bay – Huntington Harbor Watershed, in the Santa Ana Regional Water Quality Control Board’s jurisdiction (OC Public Works 2017). Waste discharge requirements for discharges to storm drains in the part of Orange County in the Santa Ana Watershed are set forth in the Municipal Stormwater (MS4) Permit, Order No. R8-2009-0030, issued by the Santa Ana Regional Water Quality Control Board (SARWQCB) in 2009.

Project Design and Project Operation

Expected pollutants of concern for the Proposed Project site identified in the PWQMP are suspended solids/sediment, nutrients, pathogens (bacteria/viruses), pesticides, oil and grease, and trash and debris.

The PWQMP includes the following proposed BMPs for the Proposed Project:

- **Low-Impact Development (LID)** is an approach to land development (or re-development) that works with nature to manage stormwater as close to its source as possible. LID employs principles such as preserving and recreating natural landscape features, and minimizing effective imperviousness to create functional and appealing site drainage that treats stormwater as a resource rather than a waste product. There are many practices that adhere to these principles such as bioretention facilities, rain gardens, vegetated rooftops, rain barrels, and permeable pavements. By implementing LID principles and practices, water can be managed in a way that reduces the impact of built areas and promotes the natural

movement of water within an ecosystem or watershed. Applied on a broad scale, LID can maintain or restore a watershed's hydrologic and ecological functions.

LID BMPs:

- Impervious area dispersion
- Infiltration basins

- **Site Design BMPs** are intended to reduce or eliminate post-project runoff:
 - Area drains
 - Infiltration basins

- **Structural Source Control BMPs** reduce the potential for pollutants to enter runoff:
 - Storm drain system signage
 - Design and construct trash and waste storage areas to minimize pollution
 - Efficient irrigation systems and irrigation controls

- **Nonstructural Source Control BMPs** reduce the potential for pollutants resulting from activities onsite to enter runoff:
 - Education of owners and employees
 - Activity restrictions
 - Common Area Landscape Management
 - BMP Maintenance and Inspections
 - Hazardous Materials Disclosure Compliance
 - Common Area Litter Control
 - Street sweeping private streets and parking lots

Upon implementation of BMPs specified in the Preliminary WQMP, no new significant water quality impact from project operation would occur.

Project Construction

Construction projects of one acre or more are regulated under the Statewide General Construction Permit, Order No. 2012-0006-DWQ, issued by the State Water Resources Control Board (SWRCB) in 2012. Projects obtain coverage by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) estimating sediment risk from construction activities to receiving waters, and specifying Best Management Practices (BMPs) that would be used by the project to minimize pollution of stormwater. Categories of BMPs used in SWPPPs are described below in Table 7.

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Table 7 Construction Best Management Practices

Category	Purpose	Examples
Erosion Controls and Wind Erosion Controls	Cover and/or bind soil surface, to prevent soil particles from being detached and transported by water or wind	Mulch, geotextiles, mats, hydroseeding, earth dikes, swales
Sediment Controls	Filter out soil particles that have been detached and transported in water.	Barriers such as straw bales, sandbags, fiber rolls, and gravel bag berms; desilting basin; cleaning measures such as street sweeping
Tracking Controls	Minimize the tracking of soil offsite by vehicles	Stabilized construction roadways and construction entrances/exits; entrance/outlet tire wash.
Non-Storm Water Management Controls	Prohibit discharge of materials other than stormwater, such as discharges from the cleaning, maintenance, and fueling of vehicles and equipment. Conduct various construction operations, including paving, grinding, and concrete curing and finishing, in ways that minimize non-stormwater discharges and contamination of any such discharges.	BMPs specifying methods for: paving and grinding operations; cleaning, fueling, and maintenance of vehicles and equipment; concrete curing; concrete finishing.
Waste Management and Controls (i.e., good housekeeping practices)	Management of materials and wastes to avoid contamination of stormwater.	Spill prevention and control, stockpile management, and management of solid wastes and hazardous wastes.

Source: CASQA 2003

Upon implementation of BMPs to be specified in the project SWPPP, project construction would not cause any new significant water quality impacts. The Proposed Project would not create a new significant impact or a substantial increase in the severity of previously identified effects. Preparation of a subsequent EIR would not be necessary.

- 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)?**

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The project site is over the Main Orange County Groundwater Basin. Anaheim Public Utilities (APU) provides water to the Project Site. APU water supplies comprise about 70 percent groundwater and 30 percent imported water. Proposed Project development would involve construction of 10 additional attached single-family residential units compared to Approved Project buildout on the Project Site. The target water demand for 2020 for APU's service area is 162 gallons per capita per day (gpcd) (Anaheim 2016d). The average household size in Anaheim in 2016 is estimated to be 3.46 persons (CDF 2016). Thus, the increase in population due to the net addition of 10 units by the Proposed Project would be 34.6 persons. Therefore, Proposed Project development is estimated to generate an additional 5,605 gpd water demand compared to demands generated by Approved Project buildout on the site. APU forecasts that it will have sufficient water supplies to meet Proposed Project water demands (Anaheim 2016), and Proposed Project development would not require APU to obtain new or expanded water supplies. The Proposed Project buildout would not

substantially decrease groundwater recharge to result in a substantial increase in the severity of previously identified effect of the Certified EIR. Preparation of a subsequent EIR would not be necessary.

- c) Substantially alter the existing drainage pattern of the site or 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/No Changes or New Information Requiring Preparation of an EIR.

The project site is currently almost entirely impermeable, with only 100 square feet of landscaping – that is, slightly over 0.1 percent of the site. The existing drainage pattern onsite is via sheet flow and a surface drain to the southwest side of the site, where runoff is discharged to the alley. Project development would include construction of underground storm drains and infiltration basins. The infiltration basins would be designed to store and infiltrate runoff from an 85th-percentile, 24-hour storm event, which would generate about 0.85 inches of rainfall. Runoff of volume exceeding the capacity of the infiltration basins would be discharged via surface flow to the alley southwest of the site.

At project completion, 21 percent of the site, or about 0.37 acre, would be permeable landscaping. Runoff discharged from the site from a 100-year storm would be reduced from 6.8 cubic feet per second (cfs) in existing conditions to 6.4 cfs at project completion. The Proposed Project buildout would not substantially decrease groundwater recharge to result in a substantial increase in the severity of previously identified effect of the Certified EIR. Preparation of a subsequent EIR would not be necessary.

- 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/No Changes or New Information Requiring Preparation of an EIR.

Project development would not cause flooding on- or off-site, as substantiated above in Section 5.9.2(c).

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

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

See Responses to 5.9.2(a) and 5.9.2(c).

- f) Otherwise substantially degrade water quality?**

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

Project water quality impacts would be less than significant, as substantiated in Section 5.9.2(a).

- 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 Project Site is designated as Zone X, that is, a 500-year flood zone, by the Federal Emergency Management Agency (FEMA 2017). The Proposed Project does not involve any housing

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development within a 100-year flood hazard area. No impact would occur. Preparation of a subsequent EIR would not be necessary.

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

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The Project Site is designated as Zone X, a 500-year flood zone; no new significant impact would occur.

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?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The project site is in the inundation zone for Prado Dam (Anaheim 2004a), which is on the Santa Ana River and approximately 15.5 miles east from the project site. Prado Dam is a flood control dam; thus, only a small fraction of its reservoir capacity is usually filled. During flood flows on the Santa Ana River, the Seven Oaks Dam on the Santa Ana River in the southwestern foothills of the San Bernardino Mountains works in tandem with Prado Dam: when water is rising behind Prado Dam, Seven Oaks Dam stores flows until water can be released at a controlled rate from Prado Dam; water is then released from Seven Oaks Dam within the capacity of the Santa Ana River channel downstream. Seven Oaks Dam is designed to provide 350-year flood protection for downstream areas (OC Public Works 2017b).

However, due to the length of time required for water to reach the project area if the Prado Dam were to fail, and the lack of appreciable amounts of water behind the Prado Dam, project development would not expose people or structures to a significant risk of loss, injury, or death in the case of dam failure, and impacts would be less than significant. Therefore, the Proposed Project would not subject people or structures to substantial hazards from dam inundation and impacts would be less than significant. Preparation of a subsequent EIR would not be necessary.

j) Expose people or structures to inundation by seiche, tsunami, or mudflow?

No Impact.

A seiche is a surface wave created when an inland water body is shaken, usually by an earthquake. There are no bodies of water near the site, and project development would not subject people or structures to flooding from a seiche.

A tsunami is a sea wave caused by a sudden displacement of the ocean floor, most often due to earthquakes. The Project Site is approximately 12.5 miles northeast of the Pacific Ocean. Therefore, project development would not place people or structures at risk of flooding due to tsunami.

A mudflow is a landslide composed of saturated rock debris and soil with a consistency of wet cement. The Project Site is flat and is therefore not subject to mudflows. No impact would occur and no changes or new information would require preparation of a subsequent EIR.

- k) **Substantially degrade water quality by contributing pollutants from areas of material storage, vehicle or equipment fueling, vehicle or equipment maintenance (including washing), waste handling, hazardous materials handling, or storage, delivery areas, loading docks or other outdoor work areas?**

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

See Response to 5.9(a).

- l) **Substantially degrade water quality by discharge which affects the beneficial uses (i.e., swimming, fishing, etc.) of the receiving waters?**

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

See Response to 5.9(a).

5.9.3 Adopted Mitigation Measures Applicable to the Proposed Project

EIR No. 330 for the Update Project

No mitigation measures from MMP No. 122A are applicable to the proposed project.

5.10 LAND USE AND PLANNING

5.10.1 Summary of Previous Environmental Analysis

EIR No. 330 for the Update Project

EIR No. 330 concluded that implementation of the Update Project would not substantially divide established communities. The Update Project was found to be consistent with plans and policies intended to avoid or mitigate an environmental effect, including the City's General Plan and Zoning Code, and the Regional Comprehensive Plan and Guide issued by the Southern California Association of Governments (SCAG). The Update Project implementation was found to comply with provisions of the Orange County Central/Coastal Natural Communities Conservation Plan (NCCP).

SEIR No. 346 for the Rezoning Project

The SEIR No. 346 determined that because EIR No. 330 contemplated development of the housing opportunity sites for residential and mixed uses, land use and planning impacts resulting from the Rezoning Project would be less than significant.

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5.10.2 Impacts Associated with the Proposed Project

Would the Proposed Project:

Environmental Issues	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstances Requiring Major EIR Revisions	New Information Showing New or Increased Significant Effects	Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
a) Physically divide an established community?					X
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?				X	
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?					X

Comments:

a) Physically divide an established community?

No Impact. The Project Site is developed with commercial uses, and is surrounded by industrial uses to the north; by a recycling facility to the west; by a gas station, industrial uses, and multi-family residential to the south; and by detached single-family residences opposite East Street to the east. No adverse impact would occur and preparation of a subsequent EIR would not be necessary.

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/No Changes or New Information Requiring Preparation of an EIR.

The existing General Plan land use designation onsite, Low-Medium Density Residential, permits development of up to 18 dwelling units/acre. The Proposed Project includes a General Plan Amendment to change the General Plan land use designation to Medium Density Residential, which would permit development of up to 36 dwelling units per acre. The Proposed Project would be developed at 23.3 dwelling units per acre. Upon approval of the General Plan Amendment, the Proposed Project would conform with the General Plan land use designation for the site. The Proposed Project would not create a new significant

impact or a substantial increase in the severity of previously identified effects. Preparation of a subsequent EIR would not be necessary.

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

No Impact. The Project Site is in the Plan Area of the Orange County Transportation Authority M2 Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP), which encompasses all of Orange County. The Project Site is not in or near a preserve or restoration project established under the NCCP/HCP (OCTA 2014). The Proposed Project would not create a new significant impact or a substantial increase in the severity of previously identified effects. Preparation of a subsequent EIR would not be necessary.

5.10.3 Adopted Mitigation Measures Applicable to the Proposed Project

No mitigation measures related to land use and planning were identified in the Certified EIR.

5.11 MINERAL RESOURCES

5.11.1 Summary of Previous Environmental Analysis

EIR No. 330 for the Update Project

EIR No. 330 indicated that the State of California designates two areas Mineral Resource Zone 2, indicating that significant mineral resources are known to be present or considered likely to be present. In addition, there are three specific areas within the City that are designated as Regionally Significant Aggregate Resource Areas (Resource Sector), Urbanized or Urbanizing. EIR No. 330 noted that extensive amounts of the sand and gravel aggregate have been removed from these areas. However, the surface mining of these areas was anticipated to be closed in December 2004, resulting in less than significant impacts related mineral resources.

SEIR No. 346 for the Rezoning Project

SEIR No. 346 concluded that no additional significant mineral resources impacts would occur under the Rezoning Project when compared to the Update Project, as the EIR No. 330 had already included development of the housing opportunity sites.

5. Environmental Analysis

5.11.2 Impacts Associated with the Proposed Project

Would the Proposed Project:

Environmental Issues	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstances Requiring Major EIR Revisions	New Information Showing New or Increased Significant Effects	Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?					X
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?					X

For the purpose of CEQA analysis, mineral resources refer to aggregate resources that consist of sand, gravel, and crushed rock. Aggregate resources provide bulk and strength in construction materials such as portland cement and asphaltic concrete. Other nonfuel mineral resources include metals such as gold, silver, iron, and copper and industrial metals such as boron compounds, rare-earth elements, clays, limestone, gypsum, salt, and dimension stone.

The California Geological Survey (CGS) classifies the regional significance of mineral resources in accordance with the California Surface Mining and Reclamation Act (SMARA) of 1975. The State Geologist is responsible for classifying areas within California that are subject to urban expansion or other irreversible land uses. SMARA also allowed the State Mining and Geology Board (SMGB), after receiving classification information from the State Geologist, to designate lands containing mineral deposits of regional or statewide significance. Classification into MRZ is completed by the State Geologist in accordance with the SMGB's priority list and according to the presence or absence of significant mineral resources.

Of the four MRZ categories, lands classified as MRZ-2 are of the greatest importance. Such areas are underlain by demonstrated mineral resources or are located where geologic data indicate that significant measured or indicated resources are likely to be present. MRZ-2 areas are designated by SMGB as being "regionally significant." Such designations require that a lead agency's land use decisions involving designated areas be made in accordance with its mineral resource management policies (if any exist) and that it consider the importance of the mineral resource to the region or the state as a whole, not just to the lead agency's jurisdiction.

The project site is not in an area mapped MRZ-2 by the CGS (Anaheim 2004a).

Comments:

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

No Impact. The Project Site does not contain known mineral resources valuable to the region or the residents of California. As shown in Figure G-3 of the Anaheim General Plan Green Element, the Project Site does not contain regionally significant aggregate resources. The nearest area mapped MRZ-2 to the site is about 0.4 mile to the east (Anaheim 2004a). No impact would occur and no changes or new information would require preparation of a subsequent EIR.

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 Project Site does not contain mineral resources of local important as identified on a local general plan, specific plan, or other land use plan. No impact would occur and no changes or new information would require preparation of a subsequent EIR.

5.11.3 Adopted Mitigation Measures Applicable to the Proposed Project

No mitigation measures related to mineral resources were identified in the Certified EIR.

5.12 NOISE

5.12.1 Summary of Previous Environmental Analysis

EIR No. 330 for the Update Project

EIR No. 330 determined that implementation of the General Plan goals and policies, existing codes and regulations, and implementation of mitigation measures will reduce all potential short-term construction noise and vibration impacts to a less than significant level. However, operational noise impacts have been determined as significant and unavoidable as many roadways within the City are expected generate noise levels in excess of 65 CNEL. As a result, in locations where these roadways are adjacent to existing sensitive land uses, the impacts are anticipated to remain significant. The City of Anaheim adopted a Statement of Overriding Considerations for significant and unavoidable impacts identified in EIR No. 330..

Railroad and airport noise impacts and industrial stationary-source noise impacts were also identified as less than significant provided that relevant General Plan goals and policies, Municipal Codes, and mitigation measures are implemented.

SEIR No. 346 for the Rezoning Project

Traffic noise impacts from buildout of the Rezoning Project were identified as significant and unavoidable in SEIR No. 346 as with the EIR No. 330. The City of Anaheim adopted a Statement of Overriding Considerations for significant and unavoidable impacts identified in SEIR No. 346. Residential projects that would be developed pursuant to the Rezoning Project would comply with City noise standards, and

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stationary-source noise impacts due to project buildout were determined to be less than significant. Implementation of the Rezoning Project would generate construction noise and groundborne vibration; such impacts were identified as less than significant.

5.12.2 Impacts Associated with the Proposed Project

Would the Proposed Project result in:

Environmental Issues	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstances Requiring Major EIR Revisions	New Information Showing New or Increased Significant Effects	Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
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?				X	
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?				X	
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?				X	
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?				X	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?					X
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?					X

Comments:

The following discussion and analysis is based on the Acoustic Impact Study prepared by Hans Giroux & Associates, dated January 24th, 2017. This document is included as Appendix F to this Addendum.

- 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/No Changes or New Information Requiring Preparation of an EIR.

Applicable Standards

Noise/land use compatibility standards for various classes of land uses are generally expressed in the Safety and Noise Element of the General Plan to ensure that noise exposure is considered in any development decisions. The City of Anaheim has guidelines for noise exposure standards which are shown in Table 8. For residential uses such as the Proposed Project, the City recommends an exterior noise exposure of 65 dBA CNEL and interior noise exposure of 45 dBA CNEL.

Table 8 State of California Interior and Exterior Noise Standards

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

¹Indoor environment excluding: bathrooms, kitchens, toilets, closets, and corridors

²Outdoor environment limited to:

- Private yard of single-family dwellings
- Multiple-family private patios or balconies accessed from within the dwelling (Balconies 6 ft. deep or less are exempt)
- Mobile home parks
- Park picnic areas
- School playgrounds
- Hospital patios

³Noise level requirement with closed windows, mechanical ventilation or other means of natural ventilation shall be provided as per Chapter 12, Section 1205 of the Uniform Building Code.

⁴Exterior noise levels should be such that interior noise levels will not exceed 45 dBA CNEL

For “stationary” noise sources such as mechanical equipment (pool pumps, air conditioners, etc.) the City does have legal authority to establish noise performance standards designed to not adversely impact adjoining residential uses. These standards are typically articulated in the jurisdictional Municipal Code. These standards recognize the varying noise sensitivity of both transmitting and receiving land uses. The property line noise performance standards are normally structured according to land use and time of day.

City of Anaheim Noise Standards

The City Noise Ordinance is designed to protect people from non-transportation (stationary) noise. The Noise Ordinance for the City of Anaheim sets limits on the level a stationary noise source may impact an adjoining use. Chapter 6.70.010 of the Municipal Code specifies that noise levels cannot exceed 60 dBA at

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any point on the adjacent property line. Although the noise sensitivity of the receiving use may affect enforcement of the ordinance, the 60 dBA noise limit applies to any land use within the City.

Residential uses typically do not generate noise levels that would be regulated by the municipal code. Isolated residential noise events such as loud parties or barking animals may be responded to by law enforcement or animal control agencies as disturbances of the peace if warranted and not under any numerical decibel threshold.

Baseline Noise Levels

A short term on-site noise measurement was made in order to document existing baseline levels in the project area. This helps to serve as a basis for projecting noise from the surrounding area on the project. Noise monitoring was conducted on Tuesday, August 9, 2016, at one on-site location between the hours of 11:15 a.m. and 12:15 p.m. The measurement location is shown in Figure 8, Noise Monitoring Location, and summarized below in Table 9.

Table 9 Measured Noise Levels (dBA)

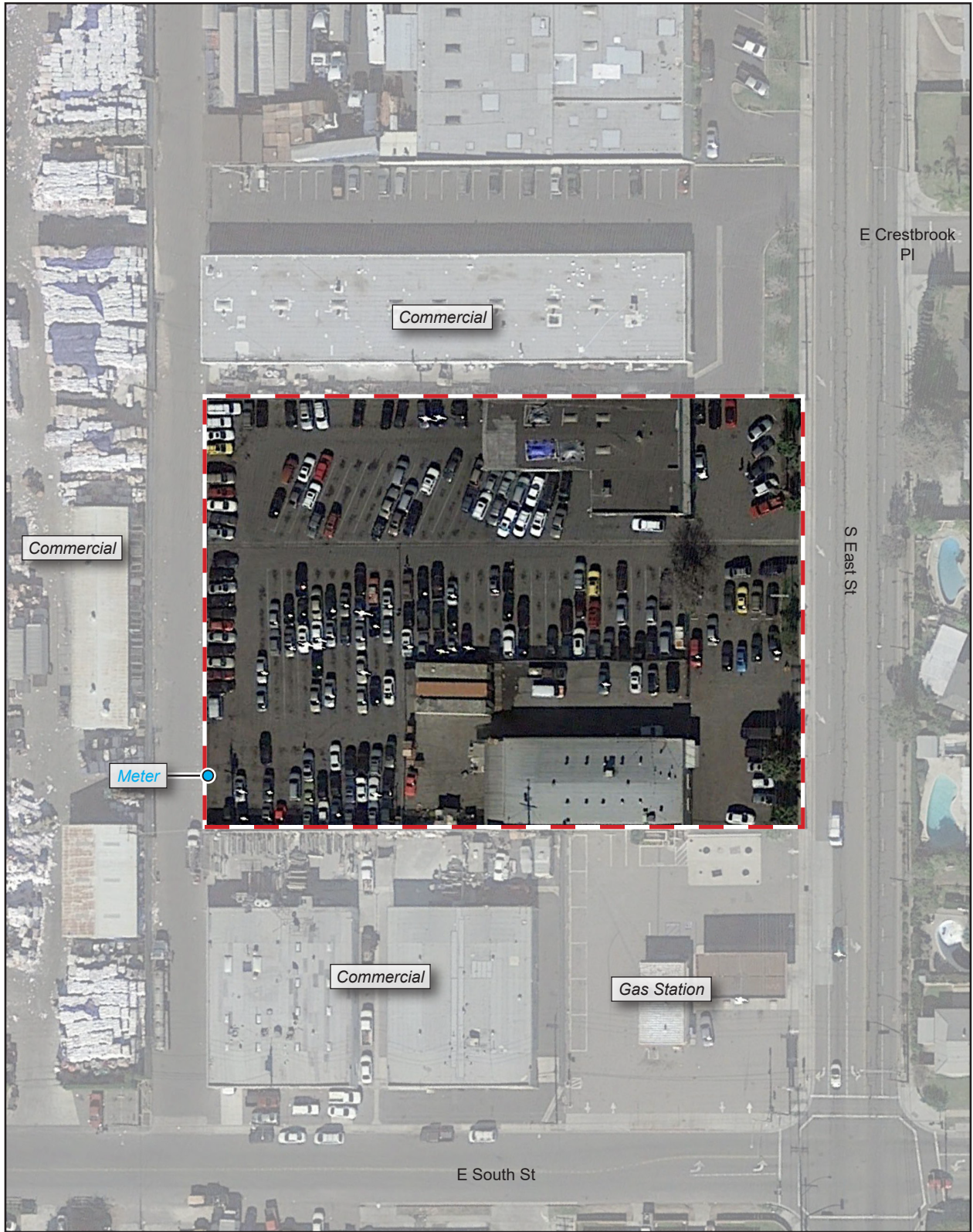
Leq	Lmax	Lmin	L10	L33	L50	L90
64	78	48	67	63	60	54

Source: Hans Giroux and Associates, January 2017

The noise meter was placed along the western property line and captured noise from the adjacent recycling facility. Monitoring experience shows that 24-hour weighted CNELs can be reasonably well estimated from mid-day noise readings. CNELs are approximately equal to mid-day Leq plus 2-3 dB (Caltrans Technical Noise Supplement, 2009). An Leq of 64 dB would translate to a CNEL of approximately 67 dB. This noise level is slightly above the recommended 65 dB CNEL compatibility threshold for residential use. However, the conversion from hourly readings to CNEL is based upon a typical fraction of daytime activities and ten-fold weighted nocturnal sources. With little or no nocturnal recycling activity, the calculated CNEL may actually be measurably lower than the observed hourly Leq level.

The Municipal Code noise standard is 60 dB Leq at any off-site property line. Recycling facility activities (balers, forklifts, trucks, banging metal containers, etc.) already cause the standard to be violated. Surrounding commercial or industrial uses are likely unaffected by current noise levels because they are not considered noise-sensitive uses. The proposed conversion of the used car auction lot to residential use is likely to reduce the noise impact of on-site activities on the existing noise environment. The periodic auto auction generates considerable noise on auto auction days with delivery and pick-up of cars by auto haulers, purchaser traffic, and loud speakers designed to be audible over the entire lot.

Figure 8 - Noise Monitoring Location
3. Project Description



— Project Boundary

0 90
Scale (Feet)



Base Map Source: Google Earth Pro, 2017

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Operational Noise Impacts

Noise Compatibility

A recent ruling by the California Supreme Court (*CBIA v Bay Area AQMD*, 2015) concluded that:

“agencies subject to CEQA generally are not required to analyze the impact of existing environmental conditions on a project’s future users or residents”

It is the project’s impact on the environment and not the environments impact on the project that must be analyzed under CEQA. Although noise levels from the adjacent recycling center exceed the City of Anaheim stationary noise ordinance standard, that fact is not a CEQA issue unless project activities were to substantially exacerbate that existing violation.

One may thus conclude that any mitigation analysis is not required under CEQA. The outdoor space is exempt by general plan policy, and the 65 dBA CNEL standard is barely exceeded along the eastern and western frontages, if at all. However, the banging of metal containers, operation of crushing and baling equipment, semi-continuous back-up alarms, forklifts loading baled recyclables and trucks traveling in and out of the recycling facility may create intrusive single noise events. Consistent with City of Anaheim standards, adequate structural noise protection will be needed to ensure that these single events do not penetrate planned livable space.

Outdoor to indoor noise penetration is dependent upon whether windows are open or closed, and whether windows are single or dual glazed. The noise stopping power in residential construction is related to the sound transmission class (STC) rating of closed windows. A confirming acoustical report will be required at Plan Check to verify that the Building Code standard of 45 dBA CNEL will be met in habitable space. The exterior façade noise from loading traffic on the east frontage and industrial noise on the west frontage is perhaps 67 dBA CNEL. Any windows/door with an STC = 22 or better will meet code as long as the occupants have the option to tightly close the fenestration. The option to close the window/door requires the provision of supplemental ventilation. Air conditioning with a fresh air intake duct for makeup air would meet this requirement.

Shared wall assemblies in duplex construction must meet STC standards for noise leakage between units. Building plans must indicate the sound rating of any proposed “party walls” and cite the acoustical laboratory STC findings and the test report numbers. Typically, fire-rated assemblies also meet the sound limits as long as care is used to minimize or protect any shared wall penetrations.

Stationary Noise

An infill three-story residential project is not a noise generator that would measurably worsen the surrounding noise environment, and will likely improve it compared to the existing auto auction site use. It should further be noted that Table N-3 (corresponding to Table 1, above) of the City of Anaheim General Plan (Noise Standards) specifically exempts outdoor decks or balconies from noise/land use compatibility if usable outdoor recreational space is 6-feet deep or less. Any planned outdoor decks or balconies are less than 6 feet deep along site perimeter units. Even without the recent finding that CEQA would not require an

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analysis/mitigation of the effects of the acoustic environment upon usable outdoor project space, general plan policy would exempt such an analysis.

Mechanical equipment typically includes heating, ventilating and air-conditioning equipment. Noise generated by mechanical equipment varies significantly depending upon the equipment type and size. The project proposes 2-ton air conditioning units to be housed behind a 6-foot CMU block wall at the sides of the buildings.

Literature from Carrier and Trane Industries shows that residential equipment has a sound level of 50-60 dBA. For this project, since only smaller units would be necessary, an average 55 dBA was used. Because the units are clustered in groups of 3 or 6, the noise level could be as high as 63 dBA if 6 units were all operating simultaneously.

The nearest air conditioning unit is at least 120 feet to the sensitive receptors across S East Street. Distance attenuation would reduce noise levels by 38 dB. In addition, the 6-foot block wall shielding the units would provide at least another 6 dB of attenuation. The resultant 20 dBA of noise that would be expected at the nearest residential property line would be significantly below ambient noise levels and not be perceptible. The noise level would be significantly below the City of Anaheim 60 dBA maximal noise level for stationary equipment at the nearest sensitive use. The surrounding warehouses and recycling plant are not considered a sensitive use and were not considered in this analysis. The Proposed Project would not create a new significant impact or a substantial increase in the severity of previously identified effects included in either of the previous CEQA documents.

The previous CEQA documents (EIR No. 330 and SEIR No. 346) identified significant traffic noise increases on various project-area roadways. The previous CEQA documents included a mitigation measure (MM-5.10-1) that requires the preparation of a project-specific acoustical report for any project generating over 100 peak hour trips. The Proposed Project site is not on one of the roadways specified in the Certified EIR; and the Proposed Project would generate fewer than 100 peak-hour trips. Thus, MM 5.10-1 does not apply to the Proposed Project.

A project-specific traffic noise discussion is presented below, which compares the Proposed Project-related traffic noise increases to the applicable thresholds and the results included in the previous CEQA documentation. The Proposed Project will include development of up to 42 residential units, a net increase of 10 units compared to Approved Project, which will result in 58 additional daily trips to and from the Proposed Project site.

For potential traffic-generated noise, the majority of people driving to the project site will enter via S. East Street. Since the Proposed Project would generate 58 more daily trips than development permitted onsite per the Approved Project, there is also a potential increase in traffic noise due to the additional number of daily trips to the project site.

However, since S. East Street is a busy thoroughfare, the additional daily trips on this roadway will be marginal. Note that a doubling of traffic flows (i.e., 10,000 vehicles per day to 20,000 per day) would be needed to create an audible (3 dB) increase in traffic-generated noise levels. An increase of 3 dB is often used

as a threshold for a substantial increase. Since the increase in project-generated daily trips is expected to be much less than the current traffic flows on S. East Street, the expected increases in project-related traffic flows is well below the commonly accepted threshold (for an ‘inaudible change) of a 3 dB increase. The Proposed Project would not result in notable or substantial permanent increases in community noise levels due to traffic flows.

No significant permanent noise increases due to project-related activities, equipment, or traffic would occur. Further, the Proposed Project would not create a substantial increase in the severity of previously identified effects included in the Certified EIR. No subsequent EIR is necessary.

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

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

Construction activities generate ground-borne vibration when heavy equipment travels over unpaved surfaces or when it is engaged in soil movement. The effects of ground-borne vibration include discernable movement of building floors, rattling of windows, shaking of items on shelves or hanging on walls, and rumbling sounds. Within the “soft” sedimentary surfaces of much of Southern California, ground vibration is quickly damped out. Because vibration is typically not an issue, very few jurisdictions have adopted vibration significance thresholds. Vibration thresholds have been adopted for major public works construction projects, but these relate mostly to structural protection (cracking foundations or stucco) rather than to human annoyance.

Possible vibration nuisance is most commonly expressed in terms of the root mean square (RMS) velocity of a vibrating object. RMS velocities are expressed in units of vibration decibels relative to a reference velocity of 1.0 micro-inch per second. The range of vibration decibels (VdB) is as follows:

- 65 VdB - threshold of human perception
- 72 VdB - annoyance due to frequent events
- 80 VdB - annoyance due to infrequent events
- 100 VdB - minor cosmetic damage

Since vibration events expected to occur at the proposed construction site will be generally infrequent, this analysis will use 80 VdB as an applicable threshold for sensitive receptors. To determine potential impacts of the project’s construction activities, estimates of vibration levels induced by the construction equipment at various distances are presented below in Table 10.

The on-site construction equipment that will generate the maximum potential vibration level is a large bulldozer. The stated vibration source level in the FTA Handbook for such equipment is 81 VdB at 50 feet from the source. With typical vibrational energy spreading loss, the vibration annoyance standard is met at 56 feet. The closest residence is 110 feet from the closest project structure. At this distance, a bulldozer that generates generally infrequent vibration levels will not likely be perceptible due to distance attenuation alone.

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Table 10 Construction Equipment Vibration Levels

Equipment	Approximate Vibration Levels (VdB)			
	50 feet	100 feet	110 feet	150 feet
Large Bulldozer	81	75	74	71
Loaded Truck	80	74	73	70
Jackhammer	73	67	66	63
Small Bulldozer	52	46	45	42

Source: FTA Transit Noise & Vibration Assessment, Chapter 12, Construction, 1995
RMS velocity calculated from vibration level (VdB) using the reference of 1 microinch/second and a crest factor of 4.

No significant permanent noise increases due to project-related vibration levels would occur. The Proposed Project would not create a substantial increase in the severity of previously identified effects included in the Certified EIR. No subsequent EIR is necessary.

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

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

See response to Section 5.12.2(a), above.

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/No Changes or New Information Requiring Preparation of an EIR.

Chapter 6.70.010 of the Municipal Code exempts noise sources associated with construction or building repair from the City of Anaheim noise standards between the hours of 7:00 AM to 7:00 PM. Additional work hours may be permitted if deemed necessary by the Director of Public Works or Building Official. Therefore, construction of the Proposed Project is exempt from the City of Anaheim noise standards included in the Municipal Code as long as work is performed during permissible daytime hours.

The Proposed Project would entail construction of eight structures containing a total of 42 units on the western perimeter of S East Street. Temporary construction noise impacts will vary markedly because the noise strength of construction equipment ranges widely as a function of the equipment used and its activity level. Short-term construction noise impacts tend to occur in discrete phases dominated initially by demolition of existing structures and large earth-moving sources, then by foundation and parking facilities, and finally for finish construction. The demolition and earth-moving sources are the noisiest, with equipment noise typically ranging from 75 to 90 dB at 50 feet from the source (EPA 1971).

The proposed buildings will be built on a level site. No major grading will be performed although there is demolition. Peak noise levels from demolition equipment are taken to be 85 dB at 50 feet (EPA, 1971). The closest homes are approximately 150 feet east of the existing buildings to be demolished. Four of the six homes closest to the project site (block of homes on the east side of East Street) are shielded by an existing 5-foot noise wall along the property line. This wall will contribute up to 5 dB of attenuation (FTA, 2006).

At these setback distances, maximum construction noise would dissipate to 75 dB for the home without a noise wall and 70 dB for the homes with a wall. Construction noise could be disturbing if windows facing the construction activity were open. Temporary window closure would help minimize disturbance to quiet activities such as taking a nap, reading a book, talking on the phone, etc., but noise levels will still be noticeable. However, many people are away from home during the hours from 7 a.m. to 3 p.m. when temporary construction disturbance would be greatest. In addition, the existing industrial uses in the project area would help mask any project related construction noise.

Construction activities are exempt from numerical noise regulations if they occur during the hours allowed by the Municipal Code. However, as noted above, heavy equipment noise may be a nuisance even if generated during allowable hours. Compliance with these hours (7 a.m. to 7 p.m. Monday-Saturday) will maintain construction activity noise impacts at less-than-significant. The Proposed Project would not create a new significant impact or a substantial increase in the severity of previously identified effects included in the Certified EIR.

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. There are no public-use airports within four miles of the project site (AirNav, 2017). Project development would not expose people onsite to excessive airport-related noise levels. Therefore, no impact would occur and no subsequent EIR is necessary.

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?

No Impact. There are no heliports or other private air strips within two miles of the project site (AirNav, 2017). Project development would not expose people onsite to excessive heliport- or airstrip-related noise levels. Therefore, no impact would occur and no mitigation measures are necessary.

Overall, the Proposed Project would be consistent with the Approved Project as analyzed in EIR No. 330 and SEIR No. 346. The Proposed Project would not create a new significant impact or a substantial increase in the severity of previously identified effects.

5.12.3 Adopted Mitigation Measures Applicable to the Proposed Project

No mitigation measures are applicable to the Proposed Project.

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5.13 POPULATION AND HOUSING

5.13.1 Summary of Previous Environmental Analysis

EIR No. 330 for the Update Project

Population and housing impacts were identified as less than significant in EIR No. 330. Estimated population growth due to the Update Project would be within population projections for Orange County and would thus not be a significant impact. The Update Project would involve development of more housing units than the number of units forecast for the City in 2030; however, the increase reflects a shift in future housing development to more multi-family residential units and does not indicate a significant population impact. The EIR No. 330 concluded that the Update Project would develop increased numbers of housing units near major employment centers, thus reducing travel distances and improving jobs-housing balance.

SEIR No. 346 for the Rezoning Project

No additional significant population and housing impacts were identified, as the proposed rezoning and pursuant buildout were consistent with, and envisioned in, the GPU.

5.13.2 Impacts Associated with the Proposed Project

Would the Proposed Project:

Environmental Issues	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstances Requiring Major EIR Revisions	New Information Showing New or Increased Significant Effects	Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
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)?				X	
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?					X
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?					X

Comments:

- 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)?**

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The average household size in Anaheim in 2016 is estimated to be 3.46 persons (CDF 2016). Implementation of the Approved Project would result in development of up to 32 units and an estimated population increase of 111 residents on the Project Site. Implementation of the Proposed Project would result in development of 42 units and an estimated population increase of 145 residents on the Project Site. The net increase in population related to the Proposed Project compared to Approved Project would be 34 persons.

The population of the City at build-out of the Approved Project is estimated at 398,745. The build-out population of the Approved Project is an increase of 40,609 over the City's estimated 2016 population of 358,136 (CDF 2016). The estimated net increase in population growth due to Proposed Project would be within the citywide net increase in population growth estimated for buildout of the Approved Project. Impacts would be less than significant, and no changes or new information would require preparation of a subsequent EIR.

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

No Impact. There is no housing onsite, and no impact would occur. No changes or new information would require preparation of a subsequent EIR.

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

No Impact. There are no residents onsite, and no impact would occur. No changes or new information would require preparation of a subsequent EIR.

5.13.3 Adopted Mitigation Measures Applicable to the Proposed Project

No mitigation measures related to population and housing were identified in EIR No. 330 or SEIR No. 346.

5.14 PUBLIC SERVICES

5.14.1 Summary of Previous Environmental Analysis

EIR No. 330 for the Update Project

EIR No. 330 determined that the Update Project was expected to generate increased numbers of calls for fire and police services due to increased numbers of residents and employees and increased development intensity in the City. However, EIR No. 330 concluded that compliance with the relevant goals and policies

5. Environmental Analysis

and Municipal Codes, and implementation of MM 5.11-1 would reduce impacts to a less than significant level.

SEIR No. 346 for the Rezoning Project

No additional significant public services impacts were identified in the SEIR No. 346.

5.14.2 Impacts Associated with the Proposed Project

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

Environmental Issues	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstances Requiring Major EIR Revisions	New Information Showing New or Increased Significant Effects	Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
a) Fire protection?				X	
b) Police protection?				X	
c) Schools?				X	
d) Parks?				X	
e) Libraries or local daycare facilities?				X	

Comments:

a) Fire protection?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

Anaheim Fire & Rescue provides fire and emergency medical services to the City. The nearest fire station to the Project Site is Downtown Fire Station 1 at 500 East Broadway, about 0.8 mile by road from the site. The second nearest station to the site is Stadium Station 7 at 2222 East Ball Road, about 1.5 miles by road from the site. Station 1 is equipped with one paramedic engine, one fire engine, and one truck; Station 7 is equipped with one paramedic engine (Anaheim 2017c). Anaheim Fire & Rescue's operating budget is funded mostly through the City's General Fund, which in turn consists almost entirely of revenues from transient occupancy taxes, property taxes, and sales taxes (Anaheim 2016c).

Proposed Project implementation would involve development of a net increase of 10 residential units onsite compared to that permitted onsite by the Approved Project. Thus, Proposed Project development is expected to cause a very small incremental increase in fire protection and emergency medical services calls. Proposed

Project operation would generate a small net increase in property taxes from the site; and would indirectly generate a small net increase in sales taxes paid by project residents, compared to what would have been generated by Approved Project implementation on the site. Such increase in City revenues available for Fire & Rescue funding would reduce project impacts.

This impact would be less than significant after implementation of Mitigation Measure 5.11-1 set forth in the Certified EIR. The Proposed Project would not create additional demands for fire protection compared to the Certified EIR. Preparation of a subsequent EIR would not be necessary.

b) Police protection?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

As discussed in EIR No. 330 and SEIR No. 346, the Anaheim Police Department (APD) provides law enforcement services to the Project Site. The funding for new personnel needed to maintain acceptable service levels would come from the City of Anaheim's General Fund. Property taxes and other fees assessed for the property would contribute to the General Fund revenues. Proposed Project implementation would involve development of a net increase in 10 residential units compared to the development potential of the site under the Approved Project. However, the additional 10 units can be served by the Anaheim Police Department with no additional impacts to the environment. Therefore, the Proposed Project would not create a new significant impact or a substantial increase in the severity of previously identified effects. Preparation of a subsequent EIR would not be necessary.

c) Schools?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The project Site is in the Anaheim Elementary School District and the Anaheim Union High School District.

Anaheim Elementary School District operates 26 schools; serves grades K-6; and had total enrollment of 18,852 in the 2015-16 school year. Anaheim Union High School District operates 21 junior high and high schools; serves grades 7-12; and had total enrollment of 31,276 in the 2015-16 school year (CDE 2017). The project site is in the attendance boundaries of Thomas Jefferson Elementary School, South Junior High School, and Katella High School (NCES 2017).

In the 2015-16 school year:

- Thomas Jefferson Elementary had enrollment of 640 students in 26 classes.
- South Junior High School had enrollment of 1,542 students in 65 classrooms
- Katella High School had enrollment of 2,619 students in 92 classrooms (CDE 2017; AESD 2017; AJUHSD 2016a; AJUHSD 2016b).

Proposed Project implementation would involve development of a net increase of 10 residential units compared to what the Approved Project permits on the site.

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The student generation rates used in EIR No. 330 for single-family residences were 0.406 elementary (K-6) students per unit; 0.144 junior high (7-8) students per unit, and 0.240 high (9-12) students per unit.

Therefore, the net increase in student generation by Proposed Project development compared to Approved Project is estimated as four elementary school students, one junior high school student, and two high school students.

The Proposed Project would pay development impact fees for schools pursuant to California Government Code Section 65996 (Senate Bill 50). School development impact fees are defined as full and complete school facilities mitigation. Therefore, after payment of SB 50 fees, no new significant impact would occur. Preparation of a subsequent EIR would not be necessary.

d) Parks?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

Anaheim city parks are maintained by the Community Services Department Parks Division. The Community Services Department Recreation Division offers recreation programs at City parks. The Proposed Project Site is in a Park Deficiency Area mapped in the General Plan Update Green Element: that is, it is outside of a one-half-mile radius of Neighborhood and Community Parks or one-quarter-mile radius of a Mini Park (Anaheim 2004a). Parks within one mile of the Project Site include:

- **Mini-Parks:**
 - George Washington Park, 1.7 acres
 - Citrus Park, 2.8 acres
 - Walnut Grove Park, 2.9 acres
 - Little Peoples Park, 0.9 acres
 - Colony Park, 1.0 acre
- **Neighborhood Park:**
 - Lincoln Park, 5.4 acres
- **Community Park:**
 - Boysen Park, 24.4 acres (Calands.org 2017)

Proposed Project implementation would involve development of a net increase of 10 residential units – estimated to house about 34 residents – compared to that permitted onsite by the Approved Project. Such increase in residents is expected to cause a slight increase in usage of existing City parks as well as generate demand for additional parkland.

The Anaheim General Plan sets forth a standard of at least two acres of parkland per 1,000 residents (Anaheim 2004a). Proposed Project development would thus generate demand for approximately 0.068 acres of additional parkland in the City. The City of Anaheim requires residential development projects to dedicate land for development of parks, and/or pay fees in lieu of such dedication, in amounts set forth in Municipal

Code Chapter 17.34, *Development Fees*. The Proposed Project would dedicate land and/or pay in-lieu fees in accordance with Municipal Code Chapter 17.34. The proposed additional units would also generate additional tax revenue for the City, part of which could be allocated for recreation services and park maintenance. Therefore, no additional impacts would occur and preparation of a subsequent EIR would not be necessary.

e) Library services or local daycare facilities?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

Local public services include libraries, daycare facilities, post offices, and hospitals. The Proposed Project would result in an incrementally higher demand for such services; however, these increases would not represent a significant impact. Although no impact would occur, adherence to previously approved MM 5.11-1 from the Certified EIR, identified below, would ensure that an impact would not occur.

5.14.3 Adopted Mitigation Measures Applicable to the Proposed Project

The following mitigation measures from the Updated and Modified MMP No. 122A for the Approved Project are applicable to the Proposed Project and incorporated into MMP No. 347.

MM 5.11-1 Future projects will be reviewed by the City of Anaheim on an individual basis and will be required comply with requirements in effect at the time building permits are issued (i.e., impact fees, etc.) or if an initial study is prepared and the City determines the impacts to be significant, then the project will be required to comply with appropriate mitigation measures (i.e., fire station sites, etc.).

5.15 RECREATION

5.15.1 Summary of Previous Environmental Analysis

EIR No. 330 for the Update Project

EIR No. 330 concluded that buildout of the Update Project would cause increased demands for parks in the City overall, and increased demands specifically in areas where residential uses would be permitted where no such uses then existed.

Residential developments in the City are required to dedicate land for parkland and/or pay in-lieu fees to offset impacts on demand for parks. Impacts were identified as less than significant after compliance with the City's park dedication ordinance.

SEIR No. 346 for the Rezoning Project

No additional significant recreation impacts were identified, as the Rezoning Project were determined to be consistent with, and envisioned in, the Update Project.

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5.15.2 Impacts Associated with the Proposed Project

Environmental Issues	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstances Requiring Major EIR Revisions	New Information Showing New or Increased Significant Effects	Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?					X
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?					X

Comments:

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

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

Project impacts on recreational facilities are addressed above in Section 5.14.2.d. Project development would add about 34 residents to the City compared to Approved Project buildout, thus generating slight increases in usage of existing parks and demands for additional parkland. The Proposed Project would dedicate land and/or pay in-lieu fees in accordance with Municipal Code Chapter 17.34. The Proposed Project would not create a new significant impact or substantially intensify a previously identified impact.

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

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

New impacts would be less than significant, as explained above in Section 5.14.2.d.

5.15.3 Adopted Mitigation Measures Applicable to the Proposed Project

No mitigation measures related to recreation were identified in EIR No. 330 or SEIR No. 346 except for the following standard requirement, which was derived from existing regulations, requirements, and standard practices set forth by regional and local agencies.

Standard Requirements

SR 5.13-1 Prior to issuance of building permits, property owners/developers shall comply with Anaheim Municipal Code, Section 17.08.250, which requires the provision of parkland and/or the payment of fees, consistent with the Quimby Act.

5.16 TRANSPORTATION/TRAFFIC

5.16.1 Summary of Impacts Identified in the Program EIR

EIR No. 330 for the Update Project

EIR No. 330 identified significant traffic impacts of the Update Project buildout at seven intersections:

- Dale/Lincoln
- Harbor Boulevard / Ball Road
- Sportstown/Katella
- Tustin Avenue / La Palma Avenue
- Tustin/SR-91 WB Ramps
- Imperial Highway/Santa Ana Canyon Road
- Weir Canyon/SR-91 EB Ramps

Improvements proposed in the Update Project Circulation Element reduced impacts at four of the seven intersections to less than significant. After mitigation, traffic impacts at three of the intersections were identified as significant and unavoidable:

- Harbor Boulevard / Ball Road
- Tustin Avenue / La Palma Avenue
- Imperial Highway/Santa Ana Canyon Road

Impacts at one Congestion Management Program intersection, Harbor Boulevard / Ball Road, were identified as significant and unavoidable. Buildout of the Update Project was not identified as significantly impacting air traffic levels or air traffic patterns; roadway design hazards; emergency access; or parking capacity.

SEIR No. 346 for the Rezoning Project

SEIR No. 346 identified significant traffic impacts of the Proposed Project to 20 intersections. Impacts at seven of the intersections were identified as significant and unavoidable due to physical constraints on intersection widening, including buildings and mature trees.

No significant impacts respecting roadway design hazards, emergency access, or alternative transportation were identified.

5. Environmental Analysis

5.16.2 Impacts Associated with the Proposed Project

Would the Proposed Project:

Environmental Issues	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstances Requiring Major EIR Revisions	New Information Showing New or Increased Significant Effects	Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?				X	
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?				X	
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?					X
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X	
e) Result in inadequate emergency access?				X	
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?				X	

A Traffic Impact Analysis, East and South Street, City of Anaheim, California (TIA) was completed for the Proposed Project by LSA in April 2017 and is included in its entirety as Appendix G to this Addendum. The TIA follows guidelines provided by the City of Anaheim Transportation Section of the Department of Public Works. SEIR No. 346 analyzed traffic impacts resulting from the Anaheim Housing Opportunities Site Rezoning Project, which permitted development of 32 low-medium density residential units on the Proposed Project site. The TIA analyzed impacts of development of 42 residential units on the site. The Traffic Impact

Analysis (included as Appendix G) and the following analysis were prepared for the Proposed Project to meet the City's requirements.

Comments:

- a) **Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?**

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

Existing Conditions

Roadways

- **East Street:** East Street is a north-south roadway located east of and adjacent to the project site and is classified as a Secondary Arterial by the City's General Plan Circulation Element. East Street is a four-lane roadway divided by a two-way median left-turn (TWMLT) lane. East Street provides direct access to the project site and therefore facilitates all of the trips generated by the project. The posted speed limit on East Street is 35 miles per hour (mph). There are sidewalks provided on both sides of the street. There are no bike lanes, and on-street parking is not permitted.
- **South Street:** South Street is an east-west roadway located south of the project site and is classified as a Collector Street by the City's General Plan Circulation Element. It is a two-lane, undivided roadway. The posted speed limit on South Street is 35 mph. There are sidewalks on both sides of the street, and on-street parking is permitted. Bike lanes are not provided.
- **Santa Ana Street:** Santa Ana Street is an east-west roadway located north of the project site and is classified as a Collector Street by the City's General Plan Circulation Element. It is a two-lane undivided roadway. The posted speed limit on Santa Ana Street is 35 mph. There are sidewalks on both sides of the street, and on-street parking is permitted. Bike lanes are not provided.

Intersections

The TIA analyzed traffic conditions at two intersections, East Street at South Street and East Street at Santa Ana Street. Both intersections are signalized and under the jurisdiction of the City of Anaheim.

Roadway Segments

The TIA analyzed one roadway segment, East Street between South Street and Santa Ana Street.

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Methodology: Intersections

In accordance with the City's *Criteria for Preparation of Traffic Impact Studies*, the study area intersections were analyzed using Intersection Capacity Utilization (ICU) methodology for signalized intersections (i.e., existing intersections) and Highway Capacity Manual 2010 (HCM 2010) methodology for unsignalized intersections (i.e., project driveways). Traffix (Version 8.0) and Synchro 9.1 are the software applications utilized to determine the levels of service (LOS) for signalized and unsignalized intersections, respectively.

The ICU methodology compares the amount of traffic an intersection is able to process (capacity) to the level of traffic during peak hours (volume). The resulting volume-to-capacity (v/c) ratio is expressed in terms of LOS. The HCM 2010 methodology calculates the delay experienced by all movements through an intersection. At a two-way, stop-controlled intersection (i.e., unsignalized intersections where the main street is uncontrolled and the minor street has to stop before finding a gap to enter the main street), delay is reported for the most delayed approach. LOS criteria for intersections are presented below.

Levels of Service

LOS is a qualitative assessment of the quantitative effects of such factors as traffic volume, roadway geometrics, speed, delay, and maneuverability on roadway and intersection operations. LOS is assigned along the following letter gradient where LOS A represents free-flow activity, and LOS F represents overcapacity operation:

- **LOS A:** No approach phase is fully utilized by traffic, and no vehicle waits longer than one red indication. Typically, the approach appears quite open, turns are made easily, and nearly all drivers find freedom of operation.
- **LOS B:** This service level represents stable operation, where an occasional approach phase is fully utilized, and a substantial number are nearing full use. Many drivers begin to feel restricted within platoons of vehicles.
- **LOS C:** This level still represents stable operating conditions. Occasionally, drivers may have to wait through more than one red signal indication, and backups may develop behind turning vehicles. Most drivers feel somewhat restricted, but not objectionably so.
- **LOS D:** This level encompasses a zone of increasing restriction approaching instability at the intersection. Delays to approaching vehicles may be substantial during short peaks within the peak period; however, enough cycles with lower demand occur to permit periodic clearance of developing queues, thus preventing excessive backups.
- **LOS E:** Capacity occurs at the upper end of this service level. It represents the most vehicles that any particular intersection approach can accommodate. Full utilization of every signal cycle is attained no matter how great the demand.

- LOS F:** This level describes forced-flow operations at low speeds, where volumes exceed capacity. These conditions usually result from queues of vehicles backing up from a restriction downstream. Speeds are reduced substantially, and stoppages may occur for short or long periods of time due to the congestion. In the extreme case, speed can drop to zero.

The relationship between LOS and the delay (in seconds) or v/c ratio at unsignalized and signalized intersections is as shown in Table 11 below.

Table 11 Intersection Levels of Service: Delay and Volume-to-Capacity Ratio

Intersection Level of Service	Delay (seconds) (HCM Methodology)	Volume-to-Capacity Ratio (ICU Methodology)
A	≤10.0	< 0.60
B	>10.0 and ≤15.0	0.61–0.70
C	>15.0 and ≤25.0	0.71–0.80
D	>25.0 and ≤35.0	0.81–0.90
E	>35.0 and ≤50.0	0.91–1.00
F	>50.0	> 1.00

Source: LSA 2017

Impact Significance Criteria

A transportation impact on an intersection is considered significant in accordance with Table 14. The “Final V/C Ratio” includes the future v/c ratio at an intersection, considering traffic from existing conditions, ambient growth, approved/related projects, and the Proposed Project but without any proposed mitigation. Mitigation is required for any intersection where project traffic is considered to have a significant impact.

Methodology: Roadway Segments

Using the same v/c methodology discussed above, daily roadway link v/c ratios were determined using roadway volume data and the theoretical daily capacities determined by the Circulation Element of the Orange County General Plan. Existing and future roadway volumes are based on volume data collected via pneumatic tube along East Street on Tuesday, December 20, 2016. The theoretical daily capacity of a roadway is dependent on roadway classification, as shown in Table 12 below.

Table 12 Roadway Segment Capacity

Arterial Type	Daily Capacity
Eight Lanes Divided	75,000
Six Lanes Divided	56,300
Four Lanes Divided	37,500
Four Lanes (Undivided)	25,000
Two Lanes (Undivided)	12,500

Source: LSA 2017

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Acceptable LOS

For roadway segments, the City General Plan establishes a target of LOS C. If a segment is found to operate at LOS D, E, or F under daily conditions, its operation is also analyzed under peak-hour conditions. If the roadway segment also operates at LOS D, E, or F under peak-hour conditions and project traffic increases the daily v/c ratio by 0.01 or greater, then the project is determined to have a significant impact. The relationship between LOS and the v/c ratio for roadways is shown below in Table 13.

Table 13 Roadway Segment Levels of Service: Volume-to-Capacity Ratio

Intersection Level of Service	Volume-to-Capacity Ratio
A	< 0.60
B	0.61–0.70
C	0.71–0.80
D	0.81–0.90
E	0.91–1.00
F	> 1.00

Source: LSA 2017

Impact Significance Criteria

A transportation impact on an intersection is considered significant in accordance with Table 14. The “Final V/C Ratio” includes the future v/c ratio at an intersection, considering traffic from existing conditions, ambient growth, approved/related projects, and the Proposed Project but without any proposed mitigation. Mitigation is required for any intersection where project traffic is considered to have a significant impact.

Table 14 Roadway Segment Impact Significance Criteria

Intersection Level of Service	Final V/C Ratio	Project-Related Increase in V/C Ratio
C	> 0.701–0.800	≥ 0.050
D	> 0.801–0.900	≥ 0.030
E, F	> 0.901	≥ 0.010

Source: LSA 2017

Scenarios Analyzed

The TIA analyzed traffic conditions in six scenarios:

- Existing Conditions
- Existing Plus Project Conditions
- Future (2019) Baseline Conditions: project completion is scheduled for 2019.
- Future (2019) Plus Project Conditions
- General Plan Buildout Baseline Conditions

- General Plan Buildout Plus Project Conditions

Existing Intersection Traffic Conditions

Existing Traffic Volumes

Vehicle turning volumes were collected for the study area intersections during the peak morning (7:00 a.m.–9:00 a.m.) and evening (4:00 p.m.–6:00 p.m.) commute periods on Tuesday, December 20, 2016, when schools were in session with typical hours.

Existing Intersection Levels of Service

Both study area intersections operate at LOS A in the AM and PM peak hours, as shown below in Table 15.

Table 15 Existing Intersection Levels of Service

Intersection	AM Peak Hour		PM Peak Hour	
	V/C Ratio	LOS	V/C Ratio	LOS
East Street/Santa Ana Street	0.43	A	0.50	A
East Street/South Street	0.60	A	0.56	A

Source: LSA 2017

Existing Roadway Segment Traffic Conditions

The existing daily traffic volume on East Street between Santa Ana Street and South Street is approximately 13,552 average daily traffic (ADT). With a roadway capacity of 37,500 ADT, this roadway segment operates with a v/c ratio of 0.36 and thus at an LOS of A.

Existing Project Site Trip Generation

Trip generation by the two existing businesses onsite was measured on December 19 and 20, 2016; as *Trip Generation* does not contain trip generation rates for categories of businesses fitting the two businesses onsite. As shown below in Table 16, 16 AM peak-hour trips were counted from the project site, and 33 PM peak-hour trips.

Table 16 Existing Trip Generation

Land Use	Size	Unit	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Existing Conditions (measured)	Measured		Not available	11	5	16	9	24	33

Source: LSA 2017

Project Trip Generation

Project trip generation was estimated using the trip generation rate for condominiums/townhomes from the Institute of Transportation Engineers *Trip Generation*, 9th Edition (2012) for the 42 proposed townhomes.

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The baseline condition analyzed in the TIA for the Existing Plus Project and Future (2019) Plus Project scenarios is existing conditions. The baseline condition for the General Plan Buildout Plus Project scenario is estimated traffic generation by Approved Project, that is, development of 32 townhomes.

The proposed redevelopment is estimated to generate a net increase of three trips during the AM peak hour and a net decrease of 11 trips during the PM peak hour compared to existing conditions, as shown below in Table 17.

Table 17 Trip Generation, Proposed Project Compared to Existing Conditions

Land Use	Size	Unit	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Proposed Project Trip Generation Rates		Unit	5.81	0.07	0.37	0.44	0.35	0.17	0.52
Proposed Project Trip Generation: Townhomes	42	Units	244	3	16	19	15	7	22
Existing Conditions (measured)	Measured		Not available	11	5	16	9	24	33
Net trip generation, Proposed Project – existing conditions	Not applicable			(8)	11	3	6	(17)	(11)

Source: LSA 2017

Trip Distribution and Assignment

The TIA estimated that equal proportions of trips would proceed in each of the four directions from the project site: that is, north and south via East Street, and east and west via South Street, respectively. All 244 project-generated trips would use parts of the segment of East Street between Santa Ana Street and South Street; trips that began southbound on East Street would then continue south on East Street, and west and east on South Street.

Existing Plus Project Traffic Conditions

Existing plus project traffic conditions were estimated by adding net project-generated trips to existing traffic volumes at the study area intersections and roadway segments.

Intersection Conditions

Both study area intersections are estimated to operate at acceptable LOS A in existing plus project conditions during the AM and PM peak hours, as shown below in Table 18.

Table 18 Existing Plus Project Intersection Levels of Service

Intersection	Existing				Existing Plus Project			
	AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
	V/C Ratio	LOS	V/C Ratio	LOS	V/C Ratio	LOS	V/C Ratio	LOS
East Street/Santa Ana Street	0.43	A	0.50	A	0.43	A	0.50	A
East Street/South Street	0.60	A	0.56	A	0.60	B	0.56	A

Source: LSA 2017

Roadway Segment Conditions

With the addition of 224 ADT generated by the project to the existing ADT of 13,552, the existing plus project ADT along East Street between Santa Ana Street and South Street is 13,776 trips. With a capacity of 37,500 ADT, this roadway segment operates with a v/c ratio of 0.37, corresponding to acceptable LOS A.

Project traffic impacts to the intersections and roadway segment would be less than significant in existing plus project conditions.

Future (2019) Baseline Conditions

Future (2019) baseline traffic conditions were estimated based on existing intersection and roadway traffic volumes using a one percent annual growth rate for two years, for a total of two percent growth. No specific approved or pending development projects near the Proposed Project site were identified.

Intersection Conditions

The two study area intersections are estimated to operate at acceptable LOS A and B in 2019 baseline conditions, as shown below in Table 19.

Table 19 Future (2019) Baseline Intersection Levels of Service

Intersection	AM Peak Hour		PM Peak Hour	
	V/C Ratio	LOS	V/C Ratio	LOS
East Street/Santa Ana Street	0.44	A	0.51	A
East Street/South Street	0.61	B	0.57	A

Source: LSA 2017

Roadway Segment Conditions

The projected future daily volume along East Street between Santa Ana Street and South Street is 13,823 ADT. With a capacity of 37,500 ADT, this roadway segment operates with a v/c ratio of 0.37 and thus acceptable LOS A.

5. Environmental Analysis

Future (2019) Plus Project Conditions

Project-generated traffic was added to future (2019) baseline traffic volumes at study area intersections and roadway segment to estimate 2019 plus project traffic conditions.

Intersection Conditions

The two study area intersections are estimated to operate at acceptable LOS A and B in 2019 plus project conditions, as shown below in Table 20.

Table 20 Future (2019) Plus Project Intersection Levels of Service

Intersection	2019 Baseline				2019 Plus Project			
	AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
	V/C Ratio	LOS	V/C Ratio	LOS	V/C Ratio	LOS	V/C Ratio	LOS
East Street/Santa Ana Street	0.44	A	0.51	A	0.44	A	0.51	A
East Street/South Street	0.61	B	0.57	A	0.61	B	0.57	A

Source: LSA 2017

Roadway Segment Conditions

With the addition of 224 project-generated ADT to the future (2019) ADT of 13,823, the future (2019) plus project ADT along East Street between Santa Ana Street and South Street is 14,047 trips. With a capacity of 37,500 ADT, this roadway segment operates with a v/c ratio of 0.37, that is, acceptable LOS A.

Project traffic impacts to the intersections and roadway segment would be less than significant in 2019 plus project conditions.

General Plan Buildout Baseline Condition

Trip Generation by Approved Project

The General Plan Buildout baseline condition is estimated traffic generation by Approved Project, that is, development of 32 townhomes. Trip generation is estimated as 186 daily, 14 in the AM peak hour, and 17 in the PM peak hour, as shown below in Table 21.

Table 21 Trip Generation, Approved Project

Land Use	Size	Unit	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Approved Project Trip Generation Rates		Unit	5.81	0.07	0.37	0.44	0.35	0.17	0.52
Approved Project Trip Generation: Townhomes	32	Units	186	2	12	14	11	5	17

Source: (generation rates): LSA 2017

General Plan Buildout Baseline Traffic Conditions

General Plan Buildout baseline traffic conditions are as analyzed in SEIR No. 346 for the Rezoning Project.

Intersection Conditions

Intersection geometrics at the study area intersections are anticipated to change slightly in the General Plan buildout. The southbound and northbound approaches at East Street/South Street currently have one right-turn, one through, and one left-turn movement for each approach. According to the General Plan, the right-turn only lane will become a shared through-right lane on both approaches.

The two study area intersections are estimated to operate at acceptable LOS C or better in General Plan Buildout baseline conditions, as shown below in Table 22.

Table 22 General Plan Buildout Baseline Intersection Levels of Service

Intersection	AM Peak Hour		PM Peak Hour	
	V/C Ratio	LOS	V/C Ratio	LOS
East Street/Santa Ana Street	0.60	A	0.59	A
East Street/South Street	0.80	C	0.72	C

Source: LSA 2017

Roadway Conditions

Daily traffic volume on the analyzed segment of East Street was estimated by multiplying PM peak hour turning movement volumes, yielding 20,300 ADT. With a capacity of 37,500 ADT, this roadway segment operates with a v/c ratio of 0.54, corresponding to acceptable LOS A.

General Plan Buildout Plus Project Condition

Net Trip Generation, Proposed Project less Approved Project

The net change in project trip generation analyzed in the General Plan Buildout plus project condition is Proposed Project trip generation less generation from Approved Project, shown below in Table 23.

Table 23 Trip Generation, Proposed Project less Approved Project

Land Use	Size	Unit	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Proposed Project Trip Generation Rates		Unit	5.81	0.07	0.37	0.44	0.35	0.17	0.52
Proposed Project Trip Generation: Townhomes	42	Units	244	3	16	19	15	7	22
Approved Project Trip Generation: Townhomes	32	Units	186	2	12	14	11	5	17
Net Increase	10	Units	58	1	4	5	4	2	5

Source: LSA 2017

5. Environmental Analysis

Intersection Conditions

The study area intersections are forecast to operate at acceptable LOS C or better in General Plan Buildout plus project conditions, as shown below in Table 24.

Table 24 General Plan Buildout Plus Project Intersection Levels of Service

Intersection	General Plan Buildout Baseline				General Plan Buildout Plus Project			
	AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
	V/C Ratio	LOS	V/C Ratio	LOS	V/C Ratio	LOS	V/C Ratio	LOS
East Street/Santa Ana Street	0.60	A	0.59	A	0.60	A	0.59	A
East Street/South Street	0.80	C	0.72	C	0.80	C	0.72	C

Source: LSA 2017

Roadway Conditions

With the addition of 58 ADT generated by the project to the General Plan buildout baseline ADT of 20,300, the General Plan buildout plus project ADT along East Street between Santa Ana Street and South Street is 20,358 trips. With a capacity of 37,500 ADT, this roadway segment operates with a v/c ratio of 0.54, corresponding to acceptable LOS A.

Project traffic impacts to the intersections and roadway segment would be less than significant in General Plan buildout plus project conditions. No new significant impact would occur in any of the three with-project scenarios analyzed. Therefore, the Proposed Project would not reduce effectiveness of any applicable traffic-related plans, ordinances, or policies. The Proposed Project would not create a new significant impact or a substantial increase in the severity of previously identified effects. Preparation of a subsequent EIR would not be necessary.

- b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?**

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The Orange County Transportation Authority (OCTA) adopted the Congestion Management Program (CMP) for Orange County, which provides a mechanism for coordinating land use and transportation decisions on major freeways, highways, and roadways within the County.

The CMP Highway System (CMPHS) consists of the Orange County smart street network plus the state highway system. The nearest CMP roadway to the project site is Harbor Boulevard, one mile to the west. No significant project traffic impacts were identified to the two study area intersections, each of which are within 1,200 feet of the project site. Thus, project development would not cause significant traffic impacts to any CMP roadways. Preparation of a subsequent EIR would not be necessary.

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 would not change air traffic patterns or change the location of development areas where persons would dwell and work, which would result in a substantial safety risk. The Project Site is not in an adopted airport land use plan or within two miles of public-use airport. The nearest heliport to the project site is the North Net Training Facility Heliport at 2400 East Orangewood Avenue in the City of Anaheim, about 2.4 miles to the south (Airnav.com 2017). No new or increased impact would occur and no subsequent EIR is needed.

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/No Changes or New Information Requiring Preparation of an EIR. Project development would include consolidating the two existing driveways to the project site into one driveway. The driveway would be about 81 feet from the north site boundary and 129 feet from the south site boundary. The nearest other driveways on the west side of East Street are a driveway into the gas station next to the south project site boundary, and a driveway into the industrial property to the north about 98 feet from the north project site boundary. The nearest intersecting street on the east side of East Street is Crestbrook Place about 92 feet northeast of the north site boundary. Project development would not cause conflicting turning movements with other intersections on East Street, and would not add incompatible land uses to the project site. No new significant impact would occur, and no subsequent EIR is needed.

e) Result in inadequate emergency access?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. According to the City of Anaheim General Plan's Safety Element (May 2004), the City has an emergency preparedness plan that complies with state law and that interfaces with other cities and counties in Southern California. Construction activity would be confined to the Project Site and would not interfere with vehicle movement or emergency access along East Street. Any impacts related to the addition of project-related traffic would be less than significant; therefore, the Proposed Project would not interfere with the movement of emergency vehicles along local roadways. The Proposed Project would not create a new significant impact or a substantial increase in the severity of previously identified effects. Preparation of a subsequent EIR would not be necessary.

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

There are sidewalks on both sides of East Street next to the project site. There are no bicycle lanes in the traffic study area. Public transportation bus services in Anaheim are offered by the Orange County Transportation Authority (OCTA) and Anaheim Resort Transportation (ART). No public transit bus routes operate in the traffic study area (OCTA 2017; ATN 2017). Project construction would involve construction crossing of the sidewalk fronting the project site. Project construction workers would take needed

5. Environmental Analysis

precautions to ensure that trucks and construction equipment entering and exiting the site did not pose a hazard to pedestrians on the sidewalk. Project operation would not interfere with the sidewalk. Project development would not interfere with bicycle facilities or public transit services. No new impact would occur and no subsequent EIR is required.

5.16.3 Adopted Mitigation Measures Applicable to the Proposed Project

The following mitigation measures from the Updated and Modified MMP No. 122A for the Approved Project are applicable to the Proposed Project and incorporated into MMP No. 347.

MM 5.15-5 Prior to issuance of each building permit, appropriate Transportation Impact and Improvement Fees shall be paid by the property owner/developer to the City of Anaheim in amounts determined by the City Council Resolution in effect at the time of issuance of the building permit with credit given for City-authorized improvements provided by the property owner/developer; and participate in all applicable reimbursement or benefit districts which have been established.

MM 5.15-6 Prior to approval of the first final subdivision map or issuance of the first building permit, whichever occurs first, and subject to nexus requirements, the property owner/developer shall irrevocably offer for dedication (with subordination of easements), including necessary construction easements, the ultimate arterial highway right(s)-of-way as shown in the Circulation Element of the Anaheim General Plan adjacent to their property.

5.17 UTILITIES AND SERVICE SYSTEMS

5.17.1 Water

5.17.1.1 SUMMARY OF PREVIOUS ENVIRONMENTAL ANALYSIS

EIR No. 330 for the Update Project

Water demands by buildout of the Update Project were identified in EIR No. 330 as lower by nearly 10 percent, or about 10 million gallons per day (mgd), than buildout of the existing General Plan. Additional water mains were identified as needed for fire flow requirements in the Anaheim Resort Specific Plan Expansion Area. EIR No. 330 concluded that water supply impacts were less than significant after implementation of mitigation.

SEIR No. 346 for the Rezoning Project

No additional significant impacts to utilities and service systems were identified in SEIR No. 346.

5.17.1.2 IMPACTS ASSOCIATED WITH THE PROPOSED PROJECT

Would the Proposed Project:

Environmental Issues	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstances Requiring Major EIR Revisions	New Information Showing New or Increased Significant Effects	Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
b) Require or result in the construction of new water or waste water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				X	
d) Have sufficient water supplies available to serve the project from existing entitlements and resources or are new or expanded entitlements needed?				X	

Comments:

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

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

Water treatment facilities filter and/or disinfect water before it is delivered to customers. Anaheim Public Utilities Department (APU) provides water to the Project Site. Anaheim’s water supply comprise about 70 percent groundwater and 30 percent imported water. Imported water is treated at the Metropolitan Water District of Southern California’s Robert Diemer Filtration Plant north of the City of Yorba Linda, which has capacity of 520 mgd (Anaheim 2016; MWD 2017). APU operates one water treatment facility with 15 mgd capacity.

Proposed Project development would involve construction of 10 additional attached single-family residential units compared to Approved Project buildout on the Project Site. Target water demand in 2020 in the APU service area is 162 gallons per person per day. The target accounts for all potable water uses - indoor and outdoor; and residential and nonresidential uses; water for agricultural use may be omitted in calculating the target (Anaheim 2016). The average household size in Anaheim in 2016 is estimated to be 3.46 persons (CDF 2016). Thus, the increase in population due to the net addition of 10 units by the Proposed Project would be 34.6 persons. Therefore, Proposed Project development is estimated to generate an additional 5,605 gpd water demand compared to demands generated by Approved Project buildout on the site. There is sufficient water treatment capacity in the region for the incremental increase in water demands, and the Proposed Project would not create a new significant impact or substantially intensify a previously identified impact. No subsequent EIR is required.

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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/No Changes or New Information Requiring Preparation of an EIR.

APU forecasts that it will have sufficient water supplies to meet demands in its service area through 2040 in normal and dry conditions. APU supplies and demands from 2015 through 2040 in normal year conditions are shown below in Table 25. Anaheim's water demand forecasts in its 2015 Urban Water Management Plan are based on demographic forecasts from the Center for Demographic Research at California State University Fullerton (Anaheim 2016).

Table 25 Existing and Forecast Water Supplies and Demands, Anaheim Public Utilities

	2015	2020	2025	2030	2035	2040
Groundwater	46,937	43,435	46,626	46,946	46,933	47,000
Imported Water	15,045	18,460	19,827	19,965	19,959	19,988
Recycled Water	71	155	155	155	155	155
Total	62,053	62,050	66,608	67,065	67,047	67,143
Demands	62,053	62,050	66,608	67,065	67,047	67,143

Source: Anaheim Public Utilities 2016

Proposed Project development would generate a net increase in water demands of about 5,605 gpd compared to Approved Project buildout onsite. APU forecasts that it will have sufficient water supplies to meet Proposed Project water demands, and Proposed Project development would not require AWU to obtain new or expanded water supplies. The Proposed Project would not create a new significant impact or substantially intensify a previously identified impact. No subsequent EIR is required.

5.17.1.3 ADOPTED MITIGATION MEASURES APPLICABLE TO THE PROPOSED PROJECT

The following mitigation measures from the Updated and Modified MMP No. 122A for the Approved Project are applicable to the Proposed Project and incorporated into MMP No. 347. This measure has been modified to indicate that the Public Utilities Department is responsible for monitoring this measure. The City Engineer is within the Public Works Department. Deletions are shown in ~~strike through~~; additions are shown in underline.

5.13-1 Prior to issuance of building permits, future projects shall demonstrate compliance with the following water conservation measures to the satisfaction of ~~the City Engineer~~ Anaheim Public Utilities Department:

- Install a separate irrigation meter when the total landscaped area exceeds 2,500 square feet. (City of Anaheim Water Conservation Measures)
- Use of efficient irrigation systems such as drip irrigation systems and automatic systems that include moisture sensors. (City of Anaheim Water Conservation Measures)

- Use of low-flow sprinkler heads in the irrigation system. (City of Anaheim Water Conservation Measures)
- Use of water-conservation landscape plant materials, wherever feasible. (City of Anaheim Water Conservation Measures)
- Low-flow fittings, fixtures, and equipment including low flush toilets and urinals. (City of Anaheim Water Conservation Measures)
- Use of water efficient dishwashers, clothes washers, and other water using appliances. (City of Anaheim Water Conservation Measures).

5.17.2 Sewer

5.17.2.1 SUMMARY OF PREVIOUS ENVIRONMENTAL ANALYSIS

EIR No. 330 for the Update Project

Several deficient sewers that would require expansion were identified in EIR No. 330, especially in the Platinum Triangle and the Anaheim Resort Specific Plan Expansion Area. Impacts of the Update Project were identified as less than significant.

SEIR No. 346 for the Rezoning Project

No additional significant impacts to utilities and service systems were identified in SEIR No. 346.

5.17.2.2 IMPACTS ASSOCIATED WITH THE PROPOSED PROJECT

Would the Proposed Project:

Environmental Issues	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstances Requiring Major EIR Revisions	New Information Showing New or Increased Significant Effects	Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
a) Exceed waste water treatment requirements of the applicable Regional Water Quality Control Board?				X	
b) Require or result in the construction of new water or waste water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				X	

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Environmental Issues	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstances Requiring Major EIR Revisions	New Information Showing New or Increased Significant Effects	Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
e) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				X	

Comments:

- a) **Exceed waste water treatment requirements of the applicable Regional Water Quality Control Board?**
- e) **Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

Waste Water Treatment Requirements

The City of Anaheim, including the Project Site, is served by a comprehensive sanitary sewer system, and no wastewater is discharged that would impact the quality of surface water or groundwater resources. Proposed Project development would involve the construction of 10 additional attached single-family residential units onsite compared to Approved Project buildout onsite. The sewage and wastewater from this use would be discharged into the City's sewer system and conveyed to Orange County Sanitation District (OCSD) Reclamation Plant No. 1 in Fountain Valley.

Waste discharge requirements for Reclamation Plant No. 1 are set forth in Santa Ana Regional Water Quality Control Board Order No. R8-2012-0035 issued in 2012, and modified by Order No. R8-2012-0037. No pre-treatment is required for the wastewater from the Proposed Project since the proposed residential units would not (1) process any industrial wastewater; (2) involve dewatering or groundwater clean-up; (3) directly discharge sewage effluent; or (4) engage in other activities that would generate wastewater requiring treatment beyond what is provided at OCSD Treatment Plant No. 1.

Wastewater Treatment Capacity

It is assumed here that wastewater generation by the net increase of 10 residential units (Proposed Project less Approved Project) would be 100 percent of potable water use, that is, about 5,605 gpd.

Plant No. 1 has secondary treatment capacity of 182 mgd; average daily influent in 2015-2016 was 117 mgd, for residual capacity of 65 mgd (OCSD 2016). Nearly 100 percent of the effluent from Plant No. 1 is conveyed to the Groundwater Replenishment System (GWRS) Facility, also in the City of Fountain Valley, owned and operated by the Orange County Water District (OCWD), where the wastewater is treated further and then infiltrated into the Main Orange County Groundwater Basin – mostly for later municipal use. The GWRS, with 100 mgd capacity, is the largest indirect potable reuse treatment facility in the world (OCWD 2016a). Expansion of the GWRS to 130 mgd capacity is scheduled for completion in 2022 (OCWD 2016b).

There is sufficient wastewater treatment capacity in the region for the estimated net increase in wastewater generation by Proposed Project development, and development would not require construction of new or expanded wastewater treatment facilities. The Proposed Project would not create a new significant impact or substantially intensify a previously identified impact. No subsequent EIR is required.

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

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.
No new or expanded wastewater treatment facilities would be required, and no incremental impact would occur, as substantiated above in Section 5.17.2.2.a.

5.17.2.3 ADOPTED MITIGATION MEASURES APPLICABLE TO THE PROPOSED PROJECT

No mitigation measures applicable to wastewater treatment are set forth in the Certified EIR.

5.17.3 Electricity

5.17.3.1 SUMMARY OF PREVIOUS ENVIRONMENTAL ANALYSIS

EIR No. 330 for the Update Project

EIR No. 330 determined that existing electrical facilities could accommodate anticipated increases in electricity demand from Update Project buildout, and that impacts would be less than significant.

SEIR No. 346 for the Rezoning Project

SEIR No. 346 determined that no additional impacts to electricity supplies would occur, as the Update Project contemplated development of the housing opportunity sites with residential and mixed uses.

5.17.3.2 IMPACTS ASSOCIATED WITH THE PROPOSED PROJECT

Would the Proposed Project:

5. Environmental Analysis

Environmental Issues	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstances Requiring Major EIR Revisions	New Information Showing New or Increased Significant Effects	Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
h) Would increase demand for other public services or utilities?				X	

Comments:

h) Would increase demand for other public services or utilities?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. Anaheim Public Utilities (APU) provides electricity to the City including the project site. Proposed Project development would involve construction of 10 additional townhome units compared to Approved Project. The Project Site is in Climate Zone 8. Townhomes in Climate Zone 8 are estimated to use about 5,306 kilowatt-hours (kWh) per year per unit (CAPCOA 2016). Thus, the net increase of 10 units is estimated to generate an increase of about 53,060 kWh in annual electricity demand. APU electricity sales citywide in 2015, the latest year for which data are available, were about 3.7 billion kWh (APU 2017). The net increase in electricity demands would be negligible compared to citywide electricity supplies, and no new significant impact would occur. No subsequent EIR is required.

5.17.3.3 ADOPTED MITIGATION MEASURES APPLICABLE TO THE PROPOSED PROJECT

No mitigation measures pertaining to electricity supplies and demands and applicable to the Proposed Project are set forth in the Certified EIR.

5.17.4 Stormwater

5.17.4.1 SUMMARY OF PREVIOUS ENVIRONMENTAL ANALYSIS

EIR No. 330 for the Update Project

Existing drainage facilities in some parts of the City were identified as deficient. In addition, the eastern part of the Hill and Canyon Area was then undeveloped, thus requiring construction of drainage facilities in that area to serve future developments.

SEIR No. 346 for the Rezoning Project

No additional significant impacts to utilities and service systems were identified in SEIR No. 346.

5.17.4.2 IMPACTS ASSOCIATED WITH THE PROPOSED PROJECT

Would the Proposed Project:

Environmental Issues	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstances Requiring Major EIR Revisions	New Information Showing New or Increased Significant Effects	Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
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?				X	

Comments:

- 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/No Changes or New Information Requiring Preparation of an EIR.

The existing drainage pattern onsite is via sheet flow and a surface drain to the southwest side of the site, where runoff is discharged to the alley. Project development would include construction of underground storm drains and infiltration basins. The infiltration basins would be designed to store and infiltrate runoff from an 85th-percentile, 24-hour storm event, which would generate about 0.85 inches of rainfall. Runoff of volume exceeding the capacity of the infiltration basins would be discharged via surface flow to the alley southwest of the site (Preliminary Hydrology Study, C&V Consulting 2016, included as Appendix E to this Addendum).

At project completion, 21 percent of the site, or about 0.37 acre, would be permeable landscaping. Runoff discharged from the site from a 100-year storm would be reduced from 6.8 cubic feet per second (cfs) in existing conditions to 6.4 cfs at project completion. Therefore, implementation of the Proposed Project would not exceed the capacity of the local or regional storm drain systems. As a result, the Proposed Project would not create a new significant impact or a substantial increase in the severity of previously identified effects related to storm drain capacity. Although no impact would occur, adherence to previously approved MM 5.18-1 from SEIR No. 346, identified below, would ensure that an impact would not occur.

5.17.4.3 ADOPTED MITIGATION MEASURES APPLICABLE TO THE PROPOSED PROJECT

The following mitigation measures from the Updated and Modified MMP No. 122A for the Approved Project are applicable to the Proposed Project and incorporated into MMP No. 347.

- MM 5.18-1 Prior to approval of a final subdivision map, or issuance of a grading or building permit, whichever occurs first, the property owner/developer shall participate in the City's Master Plan of Storm Drains and related Infrastructure Improvement (Fee) Program to assist in mitigating existing and future storm drainage system deficiencies as follows:

5. Environmental Analysis

The property owner/developer shall submit a report for review and approval by the City Engineer to assist with determining the following:

- a) If the specific development/redevelopment does not increase or redirect current or historic storm water quantities/flows, then the property owner/developer's responsibility shall be limited to participation in the Infrastructure Improvement (Fee) Program to provide storm drainage facilities in 10- and 25-year storm frequencies and to protect properties/structures for a 100-year storm frequency.
- f) If the specific development/redevelopment increases or redirects the current or historic storm water quantity/flow, then the property owner/developer shall be required to guarantee mitigation to the satisfaction of the City Engineer and City Attorney's office of the impact prior to approval of a final subdivision map or issuance of a grading or building permit, whichever occurs first, pursuant to the improvements identified in the Master Plan of Drainage for the South Central Area. The property owner/developer shall be required to install the storm drainage facilities as recommended by the Master Plan of Drainage for the South Central Area to provide storm drainage facilities for 10- and 25-year storm frequencies and to protect properties/structures for a 100-year storm frequency prior to acceptance for maintenance of public improvements by the City or final building and zoning inspection for the building/structure, whichever occurs first. Additionally, the property owner/developer shall participate in the Infrastructure Improvement (Fee) Program as determined by the City Engineer which could include fees, credits, reimbursements, or a combination thereof. As part of guaranteeing the mitigation of impacts on the storm drainage system, a storm drainage system improvement phasing plan for the project shall be submitted by the property owner/developer to the City Engineer for review and approval and shall contain, at a minimum, (1) a layout of the complete system; (2) all facility sizes, including support calculations; (3) construction phasing; and, (4) construction estimates.

5.17.5 Public Utilities

5.17.5.1 SUMMARY OF PREVIOUS ENVIRONMENTAL ANALYSIS

EIR No. 330 for the Update Project

Natural Gas Service

EIR No. 330 determined that utility infrastructure is expected to expand with new development, and that provision of these services to the project area is not anticipated to require substantial alterations.

Solid Waste

EIR No. 330 concluded that solid waste generation by the Update Project would be slightly less than that by buildout of the previous General Plan. Solid waste disposal impacts were determined to be less than significant.

Telephone Service

EIR No. 330 determined that utility infrastructure is expected to expand with new development, and that provision of these services to the project area is not anticipated to require substantial alterations.

Television Service/Reception

EIR No. 330 determined that utility infrastructure is expected to expand with new development, and that provision of these services to the project area is not anticipated to require substantial alterations.

SEIR No. 346 for the Rezoning Project

Natural Gas

SEIR No. 346 determined that no additional impacts to natural gas supplies would occur, as the Update Project contemplated development of the housing opportunity sites with residential and mixed uses.

Solid Waste

No additional significant impacts to utilities and service systems were identified in SEIR No. 346.

Telephone and Cable Television

SEIR No. 346 determined that no additional impacts to telephone and cable television services would occur, as the Update Project contemplated development of the housing opportunity sites with residential and mixed uses.

5. Environmental Analysis

5.17.5.2 IMPACTS ASSOCIATED WITH THE PROPOSED PROJECT

Would the Proposed Project:

Environmental Issues	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstances Requiring Major EIR Revisions	New Information Showing New or Increased Significant Effects	Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?				X	
g) Comply with federal, state, and local statutes and regulations related to solid waste?				X	
h) Increase demand for other public services or utilities?				X	

Comments:

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

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

Proposed Project development would involve construction of 10 additional attached single-family residential units compared to Approved Project buildout on the Project Site. Single-family residential units are estimated to generate about 10 pounds of solid waste per day (ppd) per unit. Thus, the additional 10 units are estimated to generate approximately 100 pounds of solid waste per day.

In 2015 about 98 percent of the solid waste landfilled from the City of Anaheim was disposed of at two facilities, the Frank Bowerman Sanitary Landfill near Irvine and the Olinda Alpha Sanitary Landfill near Brea. The two landfills have combined residual daily disposal capacity of nearly 6,000 tons per day and remaining capacity of nearly 180 million tons, as shown below in Table 26.

There is sufficient landfill capacity in the region for the incremental increase in solid waste generation due to Proposed Project development. Therefore, no significant impact related to landfill capacity would result from implementation of the Proposed Project.

Table 26 Landfills Serving Anaheim

Landfill Nearest City	Remaining Capacity, cubic yards	Maximum Permitted Daily Disposal, tons	Average daily disposal, tons	Residual permitted daily disposal capacity, tons	Estimated closing date
Frank Bowerman Irvine	205,000,000	11,500	6,585	4,915	2053
Olinda Alpha Brea	34,200,000	8,000	6,916	1,084	2021
Total	239,200,000 cubic yards [179,400,000 tons]	19,500	13,501	5,999	Not applicable

Sources: CalRecycle 2016a; CalRecycle 2016b; CalRecycle 2016c; CalRecycle 2016d

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

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

Solid waste practices in California are governed by multiple federal, state, and local agencies that enforce legislation and regulations to ensure landfill operations minimize impacts to public health and safety and the environment. OC Waste & Recycling is obligated to obtain a Solid Waste Facilities Permit, a Stormwater Discharge Permit, and a permit to construct and operate gas management systems and meet Waste Discharge Requirements. The Local Enforcement Agency, the SCAQMD, and the California Water Resources Control Board enforce landfill regulations related to health, air quality, and water quality, respectively. The Proposed Project would not inhibit OC Waste & Recycling’s compliance with the requirements of each of these governing bodies and no new impact would occur.

h) Increase demand for other public services or utilities?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

Natural Gas

SCGC currently provides natural gas service to the City of Anaheim, including the project site (SCGC 2015). Service would be provided in accordance with SCGS’s policies and extension rules on file with the California Public Utilities Commission. Therefore, no new impacts related to the need for new systems or supplies, or substantial alterations related to natural gas would occur.

Telephone

AT&T currently provides telephone service to the City of Anaheim, including the project site. Development of the Proposed Project would create an increase in the demand on the telephone service system. Within the project site, telephone conduits would be installed in joint trenches. Joint trench design would be provided by the telephone service provider once specific development plans become available. The Proposed Project would not create a new significant impact or a substantial increase in the severity of previously identified effects.

5. Environmental Analysis

Cable

Time Warner Cable currently provides cable television, high speed internet, and digital telephone service to the project area. Development of the Proposed Project would create an increase in the demand on these services. Based on the company's service area, the project site is located within the company's Los Angeles South Division; therefore, the project site could be served by Time Warner Cable. The Proposed Project would not create a new significant impact or a substantial increase in the severity of previously identified effects.

5.17.5.3 ADOPTED MITIGATION MEASURES APPLICABLE TO THE PROPOSED PROJECT

No mitigation measures for utilities and service systems impacts were required in the Certified EIR.

5.18 MANDATORY FINDINGS OF SIGNIFICANCE

Environmental Issues	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstances Requiring Major EIR Revisions	New Information Showing New or Increased Significant Effects	Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
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?				X	
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)				X	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				X	

Comments:

- 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/No Changes or New Information Requiring Preparation of an EIR.

The project site does not contain any significant biological resources. As demonstrated in this Addendum, the Proposed Project would not result in new significant impacts to biological or cultural resources, nor would it substantially increase the severity of impacts evaluated and determined in the Certified EIR. Because the Proposed Project would not meet any of the criteria identified in Section 15162 of the State CEQA Guidelines requiring preparation of a subsequent or supplemental EIR, an Addendum to EIR No. 330 and SEIR No. 346 is the appropriate document type for the Proposed Project.

- 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/No Changes or New Information Requiring Preparation of an EIR.

The Proposed Project would increase the number of residential units permitted onsite by 10 units, from the 32 permitted in the Rezoning Project to 42. Cumulative impacts for the Proposed Project as analyzed in the Traffic Impact Analysis are those of General Plan buildout plus those from the net increase of 10 units onsite compared to those permitted under the Rezoning Project. Traffic impacts in General Plan Buildout plus project conditions were identified as less than significant (see Section 5.16.2 of this Addendum).

Therefore, the Proposed Project will not result in any new cumulatively considerable impacts or substantially increase the severity of the cumulative effects previously disclosed in the Certified EIR. As demonstrated in this Addendum, the Proposed Project would not result in new significant impacts, nor would it substantially increase the severity of impacts evaluated and determined in the Certified EIR. Because the Proposed Project would not meet any of the criteria identified in Section 15162 of the State CEQA Guidelines requiring preparation of a subsequent or supplemental EIR, an Addendum to EIR No. 330 and SEIR No. 346 is the appropriate document type for the Proposed Project.

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

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

As demonstrated in this Addendum, the Proposed Project would not result in new significant impacts, nor would it substantially increase the severity of impacts evaluated and determined in the Certified EIR. Because the Proposed Project would not meet any of the criteria identified in Section 15162 of the State CEQA Guidelines requiring preparation of a subsequent or supplemental EIR, an Addendum to EIR No. 330 and SEIR No. 346 is the appropriate document type for the Proposed Project.

5. Environmental Analysis

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