

RESPONSE TO COMMENTS/ERRATA
INITIAL STUDY/MITIGATED
NEGATIVE DECLARATION

**Euclid and Broadway Residential Project
(Development Project No. 2016-00042)**

Prepared for:

City of Anaheim

Planning and Building Department, Planning Services Division
200 South Anaheim Boulevard
Anaheim, California 92805

Contact: Christine Saunders, Associate Planner

Prepared by:

DUDEK

27372 Calle Arroyo
San Juan Capistrano, California 92675
Contact: Collin Ramsey, Project Manager

NOVEMBER 2017

**Response to Comments/Errata
Initial Study/Mitigated Negative Declaration
Euclid and Broadway Residential Project
(Development Project No. 2016-00042)**

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A Comment Letters	
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**Response to Comments/Errata
Initial Study/Mitigated Negative Declaration
Euclid and Broadway Residential Project
(Development Project No. 2016-00042)**

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Euclid and Broadway Residential Project
(Development Project No. 2016-00042)**

ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
CARB	California Air Resources Board
CEQA	California Environmental Quality Act
HRA	health risk assessment
IS/MND	Initial Study/Mitigated Negative Declaration
OCSD	Orange County Sanitation District
SCAQMD	South Coast Air Quality Management District
SoCalGas	Southern California Gas Company

**Response to Comments/Errata
Initial Study/Mitigated Negative Declaration
Euclid and Broadway Residential Project
(Development Project No. 2016-00042)**

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Initial Study/Mitigated Negative Declaration
Euclid and Broadway Residential Project
(Development Project No. 2016-00042)**

1 INTRODUCTION

An Initial Study/Mitigated Negative Declaration (IS/MND) was prepared for the proposed Euclid and Broadway Residential Project (Proposed Project) and made available for public comment for a 20-day public review period from October 5, 2017, through October 24, 2017. In accordance with the California Environmental Quality Act (CEQA) Guidelines, Section 15074(b) (14 CCR 15074(b)), before approving the Proposed Project, the City of Anaheim (City), as the lead agency under CEQA, will consider the MND with any comments received during this public review period. Specifically, Section 15074(b) of the CEQA Guidelines (14 CCR 15074(b)) states the following:

Prior to approving a project, the decision-making body of the lead agency shall consider the proposed negative declaration or mitigated negative declaration together with any comments received during the public review process. The decision-making body shall adopt the proposed negative declaration or mitigated negative declaration only if it finds on the basis of the whole record before it (including the initial study and any comments received), that there is no substantial evidence that the project will have a significant effect on the environment and that the negative declaration or mitigated negative declaration reflects the lead agency’s independent judgment and analysis.

The agencies and individuals that provided substantive written comments on the environmental issues addressed within the IS/MND are listed in Table 1. Although CEQA (California Public Resources Code, Section 21000 et seq.) and the CEQA Guidelines (14 CCR 15000 et seq.) do not explicitly require a lead agency to provide written responses to comments received on a proposed IS/MND, the lead agency may do so voluntarily. Individual comments within each communication are numbered so comments can be cross-referenced with responses. Comment letters received during the public review period are included in Appendix A.

**Table 1
Comment Letter Summary**

Letter Number	Commenter	Date
1	Darryl Taylor, Director, Facility Planning, District Construction, and Support Services, Rancho Santiago Community College District	October 9, 2017
2	Jamie K. Smith, Assistant Planner, City of Yorba Linda	October 12, 2017

**Response to Comments/Errata
Initial Study/Mitigated Negative Declaration
Euclid and Broadway Residential Project
(Development Project No. 2016-00042)**

**Table 1
Comment Letter Summary**

Letter Number	Commenter	Date
3	Lijin Sun, JD, Program Supervisor, CEQA IGR, Planning, Rule Development, and Area Sources, South Coast Air Quality Management District	October 18, 2017
4	Patricia Martz, PhD, President, California Cultural Resource Preservation Alliance Inc.	October 19, 2017
5	Justin Equina, Associate Planner, Planning Department, City of Irvine	October 23, 2017
6	Ann Crafton, Principal Staff Analyst, Planning, Orange County Sanitation District	October 23, 2017
7	James Chuang, Senior Environmental Specialist, Southern California Gas Company	October 24, 2017

Responses to comments are made in the following text to further supplement, clarify, or expand upon information already presented in the IS/MND. These responses do not change the significance determinations made or the severity of potential environmental impacts evaluated in the IS/MND. Section 15073.5(c)(4) of the CEQA Guidelines (14 CCR 15073.5(c)(4)) permits the inclusion of new information within an MND if the additional information “merely clarifies, amplifies, or makes insignificant modifications to the negative declaration.”

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2 RESPONSE TO COMMENTS

Comment Letter 1: Darryl Taylor, Director, Facility Planning, District Construction, and Support Services, Rancho Santiago Community College District

Comment 1-1

Comment

The comment states that Rancho Santiago Community College District reviewed the IS/MND and has no comment.

Response

The City appreciates Rancho Santiago Community College District's review of the IS/MND.

Comment 1-2

Comment

The comment states that Rancho Santiago Community College District wants to be notified on subsequent development steps associated with the Proposed Project, including upcoming planning and environmental notices and approvals.

Response

The City will ensure that Rancho Santiago Community College District remains on the notification list for the Proposed Project and will send future notices to the contact and address provided in the comment letter.

Comment Letter 2: Jamie K. Smith, Assistant Planner, City of Yorba Linda

Comment 2-1

Comment

The comment states that the City of Yorba Linda reviewed the IS/MND and has no comment.

Response

The City appreciates the City of Yorba Linda's review of the IS/MND.

**Response to Comments/Errata
Initial Study/Mitigated Negative Declaration
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**Comment Letter 3: Lijin Sun, JD, Program Supervisor, CEQA IGR, Planning, Rule
Development, and Area Sources, South Coast Air Quality
Management District**

Comment 3-1

Comment

The comment states the following:

In the Air Quality analysis, the Lead Agency found that the Proposed Project's construction and operational air quality impacts would be less than significant. But, the Lead Agency did not conduct a health risk assessment (HRA). The Proposed Project will be sited next to two gasoline dispensing stations. Residents at the condominium units would be exposed to benzene, ethylbenzene, and naphthalene, and all of which are known human carcinogens. To disclose the potential health risks from exposures to those human carcinogens, SCAQMD [South Coast Air Quality Management District] staff recommends conducting a[n] HRA in the Final MND.

Response

When determining whether or not an HRA was required for the Proposed Project, the City relied on the guidance in the California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective* (CARB 2005). This document recommends that lead agencies avoid siting residences within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater) or 50 feet for a typical gas station. Based on the small size (four fueling islands) of the adjacent Mobile gas station located on the southeastern corner of Euclid Street and Broadway and the 76 gas station found on the northeastern corner of the same intersection, these gas stations are considered to be "typical gas stations" (i.e., a facility with a throughput of less than 3.6 million gallons per year). Thus, pursuant to CARB's guidance, the Proposed Project should be sited 50 feet or more from these nearby gas stations' emission sources (i.e., the fueling islands/pumps).

The distance between the Proposed Project's property boundaries and the closest fueling canopy at the Mobile gas station would be 50 feet, with a greater distance between the property boundaries and the nearest fueling island (approximately 65 feet). Regarding the 76 gas station, the closest property boundary would be located more than 175 feet away from the fueling

Response to Comments/Errata
Initial Study/Mitigated Negative Declaration
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canopy. Therefore, the Proposed Project complies with CARB's guidance. It should also be noted the CARB's guidance is advisory and not regulatory; however, the City strives to comply with this guidance, as discussed herein.

Case law (*California Building Industry Association v. Bay Area Air Quality Management District* 2015) found that agencies subject to CEQA generally are not required to analyze the impact of existing environmental conditions on a project's future residents or users (i.e., "CEQA-in-reverse") but need to focus on the impacts of the project's effects on the environment. Since the nearby gas stations are already part of the existing environment, the City is not required to evaluate their potential impacts on the Proposed Project.

It should be noted that there are exceptions to the court's decision. For instance, when a project has potentially significant exacerbating effects on existing environmental hazards, those impacts are properly within the scope of CEQA because they can be viewed as impacts of the project on existing conditions rather than impacts of the environment on the project. The court concluded that it is proper under CEQA to undertake an analysis of the dispersal of existing contaminants because such an analysis would be focused on how the project "would worsen existing conditions (*California Building Industry Association v. Bay Area Air Quality Management District* 2015). In addition, there are also limited statutory exceptions to the rule. The court found that the limited number of express CEQA provisions that require analysis of the impacts of the existing environment on a project, such as impacts associated with school siting and airports, should be viewed as specific statutory exceptions to the general rule that such impacts are not properly within CEQA's scope (*California Building Industry Association v. Bay Area Air Quality Management District* 2015). However, none of these provisions apply to the Proposed Project because it would not exacerbate emissions produced at the nearby gas station, and the proposed residential land use identified by the court as an exemption to their finding would not either.

Operation of the nearby gas stations is permitted by SCAQMD, and fuel-related emissions are regulated by SCAQMD Rule 461. Gasoline-dispensing facilities are required to use Phases I/II enhanced vapor recovery systems. Phase II enhanced vapor recovery systems have an average efficiency of 95.1%, and Phase I enhanced vapor recovery systems have an average efficiency of 98% (CARB 2013). Thus, the potential for fugitive volatile organic compounds or toxic air contaminant emissions from the nearby gasoline pumps is negligible. As such, the fueling pumps would not be a significant source of toxic area contaminants, and receptors located on the Project Site (as close as approximately 65 feet from the existing fueling pumps) would not be exposed to toxic sources of air pollution.

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Comment 3-2

Comment

The comment states the following:

The Lead Agency included a discussion on CARB's Air Quality and Land Use Handbook recommendation and the cancer risk associated with the Mobil gasoline station that is located at 1680 West Broadway. However, the cancer risk cited for the Mobile gasoline station is for the residential community 50 meters east of the gasoline station and not the Proposed Project, which will be sited immediately adjacent to the Mobile gasoline station. Additionally, the Air Quality analysis did not include a discussion on the potential cumulative health impacts from the second gas station that is located at 260 Euclid Street. Therefore, SCAQMD staff recommends that the Lead Agency disclose the potential health risks from both gasoline dispensing stations in the HRA. Guidance for performing a gasoline dispensing station health risk assessment is available at SCAQMD website.

Response

A response to the SCAQMD's comment on the potential health risk impacts related to both nearby gas stations, as well as their comment on the necessity for an HRA, is provided in the response to Comment 3-1.

Comment 3-3

Comment

The comment states the following:

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, if you have any questions.

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Response

The City's responses to agency and public comments received during the IS/MND's public review period are provided in this Response to Comments/Errata. All written comments received have been adequately responded to in accordance with CEQA Guidelines, Section 15074.

Comment Letter 4: Patricia Martz, PhD, President, California Cultural Resource Preservation Alliance Inc.

Comment 4-1

Comment

The comment states that California Cultural Resource Preservation Alliance concurs with the IS/MND's conclusion that the Proposed Project has a low potential to impact buried prehistoric archaeological resources. The comment continues by stating that, since the Project Site was previously developed prior to the passage of CEQA, cultural resources surveys would not have been conducted at the time of development. The comment concludes by stating that provisions, including compliance with California Public Resources Code, Section 5097.98, for the treatment of archaeological resources, if they are discovered on the Project Site during construction activities, should be included in the IS/MND.

Response

As stated in the IS/MND, based on the negative results of the South Central Coastal Information Center records search, Native American Heritage Commission Sacred Lands File search, and reconnaissance-level survey, there is a low potential for buried, unrecorded cultural resources to be encountered during construction activities. However, based on feedback from a representative of the Gabrieleño Band of Mission Indians during the tribal notification and consultation process for the Proposed Project, and because a cultural resources evaluation was likely not conducted when the Project Site was originally developed several decades ago, the possibility exists, albeit slight, that tribal cultural resources of significance could be encountered during subsurface ground-disturbing activities. As such, in an abundance of caution, tribal cultural resources monitoring would be required as specified in Mitigation Measure MM-CUL-1. Among other requirements, Mitigation Measure MM-CUL-1 mandates that, during subsurface ground-disturbing construction activities, the property owner/developer shall retain a qualified Native American tribal representative of the Gabrieleño Band of Mission Indians, Kizh Nation. Pursuant to Mitigation Measure MM-CUL-1, if tribal cultural resources are encountered during ground-disturbing activities, and if the discovery proves to be potentially significant under CEQA as

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determined by the tribal representative, additional measures, such as data recovery excavation, avoidance of the area of the find, documentation, testing, data recovery, reburial, archival review and/or transfer to the appropriate museum or educational institution, or other appropriate actions, may be warranted.

Comment Letter 5: Justin Equina, Associate Planner, Planning Department, City of Irvine

Comment 5-1

Comment

The comment states that the City of Irvine reviewed the IS/MND and has no comment.

Response

The City appreciates the City of Irvine's review of the IS/MND.

**Comment Letter 6: Ann Crafton, Principal Staff Analyst, Planning, Orange County
Sanitation District**

Comment 6-1

Comment

The comment states that the Orange County Sanitation District (OCSD) concludes that there would be no significant impact due to increased hydraulic demand as a result of the Proposed Project. The comment continues that, while the IS/MND found that the nearest local City sewer at South Euclid Street is too shallow and hydraulically deficient to service the Proposed Project and that the Proposed Project will connect to the nearby OCSD sewer, a direct connection will not be permitted by the Proposed Project to the OCSD trunk sewer because OCSD is a regional sewer service provider and only permits direct connections to cities and other local sewer agencies. The comment concludes by stating that KB Home Coastal Inc. (Applicant) should consult the City to locate another connection point to the City's sewer system.

Response

In an email dated December 29, 2016, and appended to the Sewer Study (see Appendix F of the IS/MND), a representative of the Applicant (Surender Dewan of DMS Consultants) was told by an engineer from OCSD (Rudy Davila in the OCSD Planning Division) that OCSD is agreeable to a private sewer lateral connecting to the City's sewer system and then to OCSD's sewer

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system. Specifically, Mr. Davila stated that a “stub out” was previously constructed adjacent to the Project Site and is currently unused. Mr. Davila stated that, if the Applicant can verify that this stub out still exists, OCSD is agreeable to a new connection to this facility as long as the City’s nearby, existing flows also discharge through the connection.

The IS/MND inadvertently implied that the Proposed Project would connect directly to the OCSD sewer system. More accurately, the Proposed Project would connect to a private sewer lateral connecting to the City’s sewer system, and then subsequently connect to OCSD’s sewer system. This clarification has been made to the IS/MND as reflected in Section 3, Errata, of this Response to Comments/Errata. Ultimately, this clarification does not change the IS/MND’s conclusion that the OCSD interceptor sewer line has been found to have the capacity to adequately handle the Proposed Project’s sanitary sewer needs; therefore, there would be no change in circumstances or significance as a result of this clarifying information being added to the IS/MND.

Comment Letter 7: James Chuang, Senior Environmental Specialist, Southern California Gas Company

Comment 7-1

Comment

That comment states that the Southern California Gas Company (SoCalGas) has a 3-inch, medium-pressure distribution pipeline underneath the westbound lanes along West Broadway north of the Project Site, as well as several medium-pressure service pipelines that enter the Project Site from West Broadway and Euclid Street at the western boundary of the Project Site.

Response

The comment is acknowledged and will be forwarded to the Applicant to acknowledge and take into account during the final design and excavation phases and to implement prior to the start of excavation activities.

Although the Proposed Project would likely have to connect to and/or extend farther onto the Project Site, no relocations or other activities are required for these existing distribution and service natural gas pipelines as a result of the Proposed Project.

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Comment 7-2

Comment

The comments states that SoCalGas recommends that the project proponent call Underground Service Alert at 811 at least 2 business days prior to performing any excavation work for the Proposed Project. Underground Service Alert will coordinate with SoCalGas and other utility owners in the area to mark the locations of buried utility-owned lines.

Response

The comment is acknowledged and will be forwarded to the Applicant to implement prior to the start of excavation activities.

Comment 7-3

Comment

The comments states that, if it is determined that the Proposed Project may require SoCalGas to abandon and/or relocate or otherwise modify any portion of its existing natural gas lines, SoCalGas respectfully requests that the County and/or the project proponent coordinate with SoCalGas by calling 877.238.0092 for residential to follow up on this matter.

Response

The comment is acknowledged and will be forwarded to the Applicant to implement prior to the start of construction activities.

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3 ERRATA

The following provides minor revisions, corrections, and additions to the IS/MND. The corrections and additions are organized by section and page number of the IS/MND. New text additions are shown in underline format, and deletions are shown in ~~strikeout~~ format.

Section 2.3 – Proposed Project

Page 21

The “Sewer System” subsection of the Project Description has been updated as follows to clarify that the Proposed Project would connect to a private sewer lateral connecting to the City’s sewer system, and then subsequently connect to OCSD’s sewer system:

Sewer System

An existing 10-inch-diameter City sewer line is located within West Broadway, and an existing 8-inch-diameter City sewer line is located within South Euclid Street. An existing 48-inch-diameter OCSD interceptor sewer line is also located within South Euclid Street (Appendix F, Hydrology and Hydraulics Study, Preliminary Water Quality Management Plan, Sewer Study (DMS Consultants Inc. 2016/2017)).

The City has indicated that the existing 8-inch-diameter South Euclid Street sewer line is deficient and too shallow (i.e., less than 5 feet below grade). As a result, the Proposed Project would reconstruct the City’s sewer line within South Euclid Street, to which the Proposed Project’s sewer lateral would connect. In addition, the City’s sewer line would connect to the 48-inch-diameter OCSD interceptor sewer line, which has been found to have the capacity to adequately handle the Proposed Project’s sanitary sewer needs (Appendix F, Hydrology and Hydraulics Study, Preliminary Water Quality Management Plan, Sewer Study (DMS Consultants Inc. 2016/2017)).

Section 3 – Initial Study Checklist

Page 24

The “Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement)” subsection of the Section 3, Initial Study Checklist, has been updated

**Response to Comments/Errata
Initial Study/Mitigated Negative Declaration
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as follows to clarify that the Proposed Project would connect to a private sewer lateral connecting to the City's sewer system, and then subsequently connect to OCSD's sewer system:

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

- OCSD: Approval for the Proposed Project to connect through a reconstructed City sewer line to the existing 48-inch-diameter OCSD interceptor sewer line located within South Euclid Street.

Section 3.6 – Geology and Soils

Page 71

Section 3.6(e) has been updated as follows to clarify that the Proposed Project would connect to a private sewer lateral connecting to the City's sewer system, and then subsequently connect to OCSD's sewer system:

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

No Impact. The Proposed Project would connect through a reconstructed City sewer line to the existing OCSD sewer system that currently serves the Project Site. As such, the Proposed Project would not require a septic or alternative wastewater disposal system. Therefore, no impacts associated with the ability of soils to support septic tanks would occur.

**Response to Comments/Errata
Initial Study/Mitigated Negative Declaration
Euclid and Broadway Residential Project
(Development Project No. 2016-00042)**

4 REFERENCES

14 CCR 15000–15387 and Appendices A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

California Building Industry Association v. Bay Area Air Quality Management District, 62 Cal.App.4th 369; no. S213478.

CARB (California Air Resources Board). 2005. *Air Quality and Land Use Handbook: A Community Health Perspective*. Accessed November 2017. <http://www.arb.ca.gov/ch/landuse.htm>.

CARB. 2013. *Revised Emission Factors for Gasoline Marketing Operations at California Gasoline Dispensing Facilities*. December 23, 2013. Accessed May 2017. <https://www.arb.ca.gov/vapor/gdf-emisfactor/gdf%20umbrella%20document%20-%2020%20nov%202013.pdf>.

**Response to Comments/Errata
Initial Study/Mitigated Negative Declaration
Euclid and Broadway Residential Project
(Development Project No. 2016-00042)**

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APPENDIX A

Comment Letters



Building the future through quality education

2323 North Broadway • Santa Ana, CA 92706 -1640 • (714) 480-7300 • www.rscdd.edu

Santa Ana College • Santiago Canyon College

October 9, 2017

RECEIVED

OCT 12 2017

City of Anaheim
Planning Department
Attn: Wayne Carvalho
200 South Anaheim Boulevard, Suite 162
Anaheim, CA 92805

CITY OF ANAHEIM
PLANNING DEPARTMENT

RE: Euclid and Broadway Residential Project

Dear Mr. Carvalho:

On behalf of the Rancho Santiago Community College District, this letter shall serve as formal correspondence in regards to the above referenced correspondence. The District has facilities located at 2323 North Broadway, Santa Ana, CA 92706. We reviewed the map and location of the proposed plan and at this time, the District does not have any comments.

1-1

The District would like to be notified on subsequent development steps, including further planning and environment notices and approvals. Please note, any future correspondence should be mailed to the attention of **Darryl Taylor**, Director, Facility Planning, District Construction & Support Services.

1-2

Thank you for the opportunity to respond and provide comments. Please feel free to contact my office at (714) 480-7510 if you need further assistance.

Sincerely,

Darryl Taylor, Director
Facility Planning, District Construction & Support Services

BOARD OF TRUSTEES:

Claudia C. Alvarez • Arianna P. Barrios • John R. Hanna • Zeke Hernandez • Lawrence "Larry" R. Labrado • Nelida Mendoza • Phillip E. Yarbrough

CHANCELLOR:

Raúl Rodríguez, Ph.D.

Wayne Carvalho

From: Jamie Smith <JSmith@yorba-linda.org>
Sent: Thursday, October 12, 2017 8:06 AM
To: Wayne Carvalho
Cc: David Brantley
Subject: IS/MND- Euclid and Broadway Residential Project

Mr. Carvalho,

The City of Yorba Linda has reviewed the above noted IS/MND and has no comments.

2-1

Best regards,

Jamie K. Smith
Assistant Planner
City of Yorba Linda
4845 Casa Loma Avenue
Yorba Linda, CA 92886
Phone (714) 961-7130
jsmith@yorba-linda.org



#YorbaLinda50



SENT VIA E-MAIL AND USPS:

October 18, 2017

wcarvalho@anaheim.net

Wayne Carvalho, Contract Planner
City of Anaheim – Planning Department
200 South Anaheim Boulevard, Suite 162
Anaheim, CA 92805

**Mitigated Negative Declaration (MND) for the Proposed
Euclid and Broadway Residential Project**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final MND.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish 102,432 square feet of existing commercial structures and construct 39 condominium units totaling 87,529 square feet on 2.35 acres (Proposed Project). The Proposed Project is bounded by two gasoline stations to the northwest, residential uses to the east and west, and commercial uses to the south.

SCAQMD Staff's Summary of Air Quality Analysis and Comments

In the Air Quality analysis, the Lead Agency found that the Proposed Project's construction and operational air quality impacts would be less than significant. But, the Lead Agency did not conduct a health risk assessment (HRA). The Proposed Project will be sited next to two gasoline dispensing stations. Residents at the condominium units would be exposed to benzene, ethylbenzene, and naphthalene, and all of which are known human carcinogens. To disclose the potential health risks from exposures to those human carcinogens, SCAQMD staff recommends conducting a HRA in the Final MND¹.

3-1

The Lead Agency included a discussion on CARB's Air Quality and Land Use Handbook recommendation and the cancer risk associated with the Mobil gasoline station that is located at 1680 West Broadway. However, the cancer risk cited for the Mobile gasoline station² is for the residential community 50 meters east of the gasoline station and not the Proposed Project, which will be sited immediately adjacent to the Mobile gasoline station. Additionally, the Air Quality analysis did not include a discussion on the potential cumulative health impacts from the second gas station that is located at 260 Euclid Street. Therefore, SCAQMD staff recommends that the Lead Agency disclose the potential health risks from both gasoline dispensing stations in the HRA. Guidance for performing a gasoline dispensing station health risk assessment is available at SCAQMD website³.

3-2

¹ SCAQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When SCAQMD acts as the Lead Agency, SCAQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million to determine the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.

² Initial Study/Mitigated Negative Declaration. Page 50.

³ South Coast Air Quality Management District. *Risk Assessment Procedures – Appendix X*. <http://www.aqmd.gov/docs/default-source/planning/risk-assessment/riskassprocjune15.pdf>

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, if you have any questions.

3-3

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:JC

ORC171004-02

Control Number



California Cultural Resource Preservation Alliance, Inc.

**P.O. Box 54132
Irvine, CA 92619-4132**

**An alliance of American Indian and scientific communities working for
the preservation of archaeological sites and other cultural resources.**

October 19, 2017

Mr. Wayne Carvahlo, Contract Planner
City of Anaheim Planning Department
200 South Anaheim Blvd., Suite 276
Anaheim, CA 92805

Re: Euclid and Broadway Residential Project Development Project No. 2016-00042

Dear Mr. Carvahlo:

Thank you for the opportunity to review the Mitigated Negative Declaration for the above-mentioned project. We concur with the determination that the proposed project has a very low potential for the presence of buried prehistoric archaeological resources. However, many of the buildings were constructed prior to the passage of CEQA and therefore, cultural resource surveys would not have been conducted. We recommend that the Mitigated Negative Declaration include provisions for the treatment of archaeological resources should they be discovered during construction. This should include compliance with Public Resources Code Section 5097.98 in the event that human remains are discovered.

4-1

Your consideration of this recommendation is greatly appreciated.

Sincerely,

A handwritten signature in cursive script that reads "Patricia Martz". The signature is written in dark ink on a light-colored, slightly textured paper background.

Patricia Martz, Ph.D.
President



Community Development

cityofirvine.org

1 Civic Center Plaza, Irvine, CA 92606-5208

949-724-6000

October 23, 2017

Mr. Wayne Carvalho
City of Anaheim
Planning Department
200 South Anaheim Boulevard, Suite 162
Anaheim, CA 92805

Subject: Draft Initial Study and Mitigated Negative Declaration for the Euclid and Broadway Residential Project; Development Project No. 2016-00042

Dear Mr. Carvalho:

Thank you for the opportunity to review the Draft Initial Study and Mitigated Negative Declaration for the Euclid and Broadway Residential Project located at 312-400 South Euclid Street and 1678 W. Broadway in the City of Anaheim. The proposed project consists of demolishing existing office, commercial and restaurant buildings to develop 39 residential, attached and detached, condominium units.

5-1

Staff completed its review and has no comments. If you have any questions, please contact me at 949-724-6364 or by email at jequina@cityofirvine.org.

Sincerely,

Justin Equina
Associate Planner

ec: Kerwin Lau, Manager of Planning Services
Bill Jacobs, Principal Planner

Comment Letter 6

From: Crafton, Ann [mailto:ACRAFTON@OCSD.COM]
Sent: Monday, October 23, 2017 4:12 PM
To: Wayne Carvalho <WCarvalho@anaheim.net>
Cc: Archie, Stephanie <SARCHIE@OCSD.COM>
Subject: NOI to adopt MND for Euclid and Broadway Residential Project

RE: Development Project No. 20106-00042
Euclid and Broadway Residential Project

Orange County Sanitation District has reviewed the above stated proposed project. Our findings are below.

No significant impact due to increased hydraulic demand.

The IS/MND explains the nearest local City of Anaheim sewer at South Euclid Street is too shallow and hydraulically deficient to service this project, and the project will connect to the nearby OCSD sewer. OCSD is a regional sewer service provider and only permits direct connections to cities other local sewer agencies. A direct connection will not be permitted by this project to the OCSD trunk sewer. Instead, the Euclid and Broadway Residential Project team should consult the City of Anaheim to locate another connection point to the City's sewer system.

Please contact me if you have questions.



Ann Crafton
Orange County Sanitation District
Planning | Principal Staff Analyst
Office: 714.593.7331 | Cell: 714.264.0282 | www.ocsewers.com



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10/24/2017

Mr. Wayne Carvalho
Contract Planner
City of Anaheim Planning Department
200 South Anaheim Boulevard
Anaheim, CA 92805

Re: Euclid and Broadway Residential Project

Dear Mr. Carvalho:

Southern California Gas Company (SoCalGas) appreciates the opportunity to review and respond to the Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the Euclid and Broadway Residential Project. SoCalGas understands that the proposed project would involve demolition of 102,432 square feet of existing office, commercial, and restaurant buildings and parking lot areas on a 2.35-acre site to construct a 39-unit apartment complex of attached and detached condominiums with associated landscaping and 130 parking spaces. We respectfully request that the following comments be incorporated in the Final IS/MND.

- SoCalGas has a 3-inch medium pressure distribution pipeline underneath the westbound lanes along West Broadway north of the project site as well as several medium pressure service pipelines that enter the project site from West Broadway and from Euclid Street at the western boundary of the project site.
• SoCalGas recommends that the project proponent call Underground Service Alert at 811 at least two business days prior to performing any excavation work for the proposed project. Underground Service Alert will coordinate with SoCalGas and other Utility owners in the area to mark the locations of buried utility-owned lines.
• Should it be determined that the proposed project may require SoCalGas to abandon and/or relocate or otherwise modify any portion of its existing natural gas lines, SoCalGas respectfully requests that the County and/or the project proponent coordinate with us by calling (877) 238-0092 for Residential to follow-up on this matter.

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Once again, we appreciate the opportunity to comment on the Draft IS/MND. If you have any questions, please feel free to contact SoCalGas Environmental Review at Envreview@semprautilities.com or (213) 244-5817.

Sincerely,

James Chuang
Senior Environmental Specialist
Southern California Gas Company

Cc/Jennifer Pezda, SoCalGas