

FINAL
SUBSEQUENT ENVIRONMENTAL IMPACT REPORT ADDENDUM

Orangewood Avenue Improvements
From the Santa Ana River to the East of SR-57 and
Reorganization of Jurisdictional Boundaries



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1.0 INTRODUCTION

The City of Anaheim (City) proposes to widen Orangewood Avenue from a five-lane roadway to a six-lane divided facility to provide expanded bicycle and pedestrian access from the Santa Ana River to just east of State Route 57 (SR-57) at the SR-57/Orangewood Avenue interchange. In general, the Orangewood Avenue Improvements Project (“Proposed Project”) would incorporate an additional westbound through lane through the Project Site boundaries. The Proposed Project would also include a water pipe line connection in Orangewood Avenue right-of-way, generally beginning at Rampart Street and ending to the east at Eckhoff Street. In addition, the Proposed Project includes a change to the jurisdictional boundaries between the City of Anaheim and the City of Orange, west of the western levee of the Santa Ana River, north and south of Orangewood Avenue. This proposed reorganization includes amendments to the General Plan, Zoning Map, the Platinum Triangle Master Land Use Plan (PTMLUP), and other related documents to reflect the new City boundary and potential future use of the affected property.

The City, as the Lead Agency, has prepared Addendum No. 9 (Addendum) to the Final Subsequent Environmental Impact Report No. 339 (State Clearinghouse No. 2004121045) and Addendum Nos. 1 through 8, and 10 (herein collectively referred to as SEIR No. 339).¹ The Anaheim City Council certified and approved SEIR No. 339 for the Revised Platinum Triangle Expansion Project in 2010. This document refers to Revised Platinum Triangle Expansion Project, including all subsequent amendments analyzed by Addendum Nos. 1 through 8 and 10, as the “Approved Project.” The City has prepared this Addendum in accordance with the provisions of the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] Sections 21000 et seq.); the State *CEQA Guidelines* (Title 14, California Code of Regulations [CCR] Sections 15000 et seq.); and the rules, regulations, and procedures for implementing CEQA as set forth by the City of Anaheim. In accordance with *CEQA Guidelines* Section 15367, the City is the lead agency with principal responsibility for considering the Proposed Project for approval.

This introduction discusses:

1. The requirements of CEQA;
2. The primary purpose of an addendum to a previously certified environmental impact report (EIR);
3. The standards for adequacy of an addendum pursuant to the *CEQA Guidelines*;
4. SEIR No. 339;
5. The format and content of this Addendum;
6. The City’s processing requirements to consider the Proposed Project for approval;
7. An explanation of the Environmental Checklist provided in [Section 3.0, *Environmental Analysis*](#); and,
8. A summary of the documents that this addendum incorporates by reference and points of contact for the Proposed Project.

¹ One additional addendum and a Sustainable Communities Environmental Assessment (SCEA) were under preparation at the time of the preparation of this Addendum; refer to [Table 1-1, *SEIR No. 339 Addenda Summary Table*](#).



1.1 CALIFORNIA ENVIRONMENTAL QUALITY ACT

CEQA, a statewide environmental law contained in PRC Sections 21000–21177, applies to most public agency decisions which carry out, authorize, or approve actions that have the potential to adversely affect the environment. The *CEQA Guidelines* allow for updating and using a previously certified EIR for projects that have changed or are different from the previous project or conditions analyzed in the certified EIR. In cases where changes or additions occur with no new significant environmental impacts, an addendum to a previously certified EIR may be prepared, consistent with *CEQA Guidelines* Section 15164. The City has prepared this Addendum in accordance with Section 21166 of CEQA and Sections 15162 and 15164 of the *CEQA Guidelines*.

1.1.1 CEQA REQUIREMENTS FOR PREPARATION OF AN ADDENDUM

Section 15164(a) of the *CEQA Guidelines* states that “the lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.” Pursuant to Section 15162(a) of the *CEQA Guidelines*, a subsequent EIR or Negative Declaration is only required when:

- (1) Substantial changes are proposed in the project which 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 occur with respect to the circumstances under which the project is undertaken which 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; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete 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 shown 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 proponents decline to adopt the mitigation measure or alternative; or
 - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.



The following describes the requirements of an addendum, as defined by *CEQA Guidelines* Section 15164:

- a. The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
- b. An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.
- c. An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
- d. The decision making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
- e. A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

If none of these circumstances is present, and only minor technical changes or additions are necessary to update the previously certified EIR, an addendum may be prepared, consistent with *CEQA Guidelines* Section 15164. Based on the analysis and evaluation provided in this Addendum, no new significant impacts would occur because of the Proposed Project nor any substantial increase in the severity of any previously-identified significant environmental impact. In addition, no new information of substantial importance shows that mitigation measures or alternatives that were previously found infeasible or that are considerably different from those analyzed for SEIR No. 339 would substantially reduce one or more significant effects on the environment. Therefore, no conditions described in Section 15162 of the *CEQA Guidelines* has occurred. For this reason, an addendum is the appropriate document that will comply with *CEQA* requirements for the Proposed Project.

1.1.2 TYPE OF CEQA COMPLIANCE DOCUMENT AND LEVEL OF ANALYSIS

The purpose of this Addendum is to analyze any potential differences between the impacts identified in SEIR No. 339 for the Approved Project and those that would be associated with the Proposed Project.

Pursuant to the provisions of *CEQA* and the *CEQA Guidelines*, the City of Anaheim is the Lead Agency charged with the responsibility of deciding whether to approve the Proposed Project. As part of its decision-making process, the City is required to review and consider whether the Proposed Project would create new significant impacts or significant impacts that would be substantially more severe than those disclosed in SEIR No. 339. The Proposed Project would only trigger additional *CEQA* review beyond this Addendum if the Proposed Project creates new significant impacts or impacts that are more severe than those disclosed in SEIR No. 339 for the Approved Project. To use an addendum as the appropriate *CEQA* document for the Proposed Project, the City must find that major revisions of the SEIR No. 339 are not necessary and that none of the conditions described in *CEQA Guidelines* Section 15162 calling for the preparation of additional *CEQA* documentation has occurred.



CEQA Guidelines Section 15168(a) states that a Program EIR is appropriate for a series of actions, characterized as one large project, and are related either:

1. Geographically;
2. A logical parts [*sic*] in the chain of contemplated actions;
3. In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or
4. As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

As discussed in Section 2.0, the Proposed Project would allow for the widening and improvements to a segment of Orangewood Avenue. In addition, the Proposed Project includes a change to the jurisdictional boundaries between the City of Anaheim and the City of Orange. As detailed herein, the Proposed Project would not result in any new significant impacts that were not analyzed in SEIR No. 339, nor would the Project cause a substantial increase in the severity of any previously identified environmental impacts. The potential impacts associated with this Proposed Project would either be the same or less than those described in SEIR No. 339. In addition, there are no substantial changes to the circumstances, under which the City would undertake the Proposed Project that would result in new or more severe environmental impacts than previously addressed in SEIR No. 339. Furthermore, this Addendum does not identify any new information regarding the potential for new or more severe significant environmental impacts been identified. Therefore, in accordance with *CEQA Guidelines* Section 15164, this Addendum to the previously certified SEIR No. 339 is the appropriate environmental documentation for the Proposed Project. In acting on any of the approvals for the Proposed Project, the decision-making body must consider the whole of the data presented in the SEIR No. 339 as augmented by this Addendum. In addition, the decision making body must consider all applicable mitigation from the Updated and Modified Mitigation Monitoring Program No. 106C (also referred to as “MMP No. 106C” and “Mitigation Measures from SEIR No. 339”) approved in conjunction with SEIR No. 339.

If the City finds that, pursuant to *CEQA Guidelines* Section 15162, no new effects could occur and no new mitigation is required, the City can approve the activity as being within the scope of SEIR No. 339. As such, SEIR No. 339 clearly anticipated environmental impacts associated with projects such as the Proposed Project, and, thus, the SEIR was intended to serve as the Program EIR to be used in preparing CEQA compliance documentation for future projects.

CEQA Guidelines Section 15168(c) states that the decision making body must examine subsequent activities undertaken pursuant to a Program EIR in light of the Program EIR to determine whether an additional environmental document must be prepared. Pursuant to *CEQA Guidelines* Section 15168(c)(4), “Where the subsequent activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were covered in the Program EIR.”

This Addendum provides the environmental information necessary for the City to make an informed decision about the Proposed Project. The City has determined that an Addendum to SEIR No. 339 should be prepared, rather than a Supplemental or Subsequent EIR, based on the following facts:



- a. As demonstrated in the accompanying Environmental Checklist (see Section 3.0, *Environmental Analysis*), the Proposed Project would not require major revisions to the previously certified SEIR No. 339 because the Project would not result in any new significant impacts to the physical environment nor would it create substantial increases in the severity of the environmental impacts previously disclosed in SEIR No. 339.
- b. Subsequent to SEIR No. 339, no substantial changes occurred in the circumstances under which the Proposed Project would be undertaken.
- c. Subsequent to SEIR No. 339, no new information of substantial importance has become available that was not known at the time SEIR No. 339 was prepared.
- d. The Proposed Project's discretionary actions would not result in any new or substantially more severe significant environmental impacts beyond those disclosed in SEIR No. 339. The reasonable consequence of the Proposed Project through approval of the various discretionary and ministerial actions would also not result in any new or substantially more severe significant environmental impacts beyond those disclosed in SEIR No. 339.
- e. Subsequent to SEIR No. 339, no new mitigation measures or alternatives have been identified that were infeasible at the time the SEIR was certified and that would substantially reduce the Approved Project's significant and unavoidable impacts to air quality, greenhouse gas emissions, land use and planning, noise, and transportation and traffic.
- f. Subsequent to SEIR No. 339, no new mitigation measures or alternatives that are considerably different from those analyzed in the SEIR have been identified to reduce the Approved Project's significant and unavoidable impacts to air quality, greenhouse gas emissions, land use and planning, noise, and transportation and traffic.
- g. Technical reports that evaluate the environmental impacts that could result from implementation of the Proposed Project were prepared: Appendix A, *Biological Resources Assessment*; Appendix B, *Jurisdictional Delineation*; Appendix C, *Phase I Environmental Site Assessment*; and Appendix D, *Basis of Design Report*. These technical reports do not identify any new impacts or substantial increases in impacts to the environment beyond those disclosed in SEIR No. 339.

Based on these facts, the City determined that an addendum to SEIR No. 339 is the appropriate type of CEQA document to prepare for the Proposed Project. The purpose of this Addendum is to evaluate the Proposed Project's level of impact on the environment in comparison to the existing condition and Approved Project and SEIR No. 339.

1.2 PROJECT SUMMARY

The Proposed Project would widen Orangewood Avenue from a five-lane roadway to a six-lane divided facility to provide expanded bicycle and pedestrian access from the Santa Ana River to just east of State Route 57 (SR-57) at the SR-57/Orangewood Avenue interchange. In general, the Project would incorporate an additional westbound through lane through the Project Site boundaries. The Project would also include a pipe line connection in Orangewood Avenue right-of-way, generally beginning at Rampart Street and ending to the east at Eckhoff Street. In addition, the Proposed Project includes a change to the jurisdictional boundaries between the City of Anaheim and the City of Orange, west of the



western levee of the Santa Ana River, north and south of Orangewood Avenue. This proposed reorganization includes amendments to the General Plan, Zoning Map, the Platinum Triangle Master Land Use Plan (PTMLUP), and other related documents to reflect the new City boundary and potential future use of the affected property.

1.3 PROJECT BACKGROUND

In October 2010, the City approved the Revised Platinum Triangle Expansion Project, which included the following discretionary approvals: (1) Platinum Triangle Water Supply Assessment; (2) *Anaheim General Plan* Amendment No. 2008-00471; (3) amendments to *The Platinum Triangle Master Land Use Plan (PTMLUP)*, including The Platinum Triangle Standardized Development Agreement Form; (4) amendments to The Platinum Triangle Mixed Use (PTMU) Overlay Zone; and (5) Zoning Reclassification No. 2008-00222. SEIR No. 339, which was prepared to evaluate the potential impacts of the Revised Platinum Triangle Expansion Project, was certified by the Anaheim City Council on October 26, 2010. As a result of the land use approvals by the City, the development intensities of the PTMU Overlay Zone were increased to allow up to 18,909 residential units, 4,909,682 square feet of commercial uses, 14,340,522 square feet of office uses, and 1,500,000 square feet of institutional uses. In addition to the increase in development intensity, the Revised Platinum Triangle Expansion Project also identified upgrades to existing infrastructure to serve the proposed increased intensity of land uses. The upgrades included roadway improvements, sewer upgrades, two new water wells, a new electrical substation, natural gas infrastructure improvements, and an additional fire station.

As part of its certification of SEIR No. 339, the City Council adopted a Statement of Overriding Considerations to address significant and unavoidable environmental impacts that would result from implementation of the Revised Platinum Triangle Expansion Project. These unavoidable impacts included the following:

- Air Quality
 - Construction activities associated with the Approved Project would generate substantially more short-term air pollutants compared to the Adopted Master Land Use Plan and would continue to exceed South Coast Air Quality Management District's regional significance thresholds.
 - Implementation of the Approved Project would generate substantially more long-term air pollutants compared to the Adopted Master Land Use Plan and would continue to exceed South Coast Air Quality Management District's regional significance thresholds.
 - Construction activities would potentially expose sensitive receptors to substantial pollutant concentrations of NO_x, CO, PM₁₀, and PM_{2.5}.
 - Sensitive land uses within 500 feet of SR-57 and I-5 or within the recommended buffer distances to facilities emitting toxic air contaminants (TACs) may be exposed to substantial pollutant concentrations.

- Greenhouse Gas Emissions
 - The Approved Project would generate substantially more greenhouse gas emissions compared to the Adopted Master Land Use Plan and cumulatively contribute to climate change impacts in California. However, the Approved Project would be consistent statewide and regional greenhouse gas reductions goals.



- Land Use and Planning
 - Some development pursuant to the Approved Project would not be compatible with the Southern California Gas Company’s existing microwave tower.

- Noise
 - Build-out of the Approved Project would result in a substantial, permanent increase in ambient traffic noise levels within the vicinity of existing noise-sensitive receptors.
 - Noise-sensitive residential units proposed within the Platinum Triangle may be exposed to mobile- and stationary-source noise levels that exceed State and/or City standards.
 - Construction of the Approved Project would generate substantial levels of groundborne vibration and groundborne noise in the vicinity of vibration-sensitive land uses.
 - Development within the Platinum Triangle could result in a substantial temporary increase in noise levels in the vicinity of existing noise-sensitive land uses during construction activities.

- Transportation and Traffic
 - Project-related trip generation would impact levels of service for the area roadway system.
 - The Approved Project would increase traffic volumes on Caltrans facilities.

Nine addenda have been prepared to SEIR No. 339. Table 1-1, SEIR No. 339 Addenda Summary Table, provides a brief summary for each project within the Platinum Triangle for which the City Council approved an addendum. The City Council approved amendments to the land use assumptions in Revised Platinum Triangle Expansion Project, in conjunction with Addendum No. 2-6, through the approval of amendments to the *Anaheim General Plan*, the *Platinum Triangle Master Plan Use Plan*, and PTMU Overlay Zone. These documents, as amended, currently permit development of up to 17,501 residential units; 4,782,243 square feet of commercial uses; 13,659,103 square feet of office uses, and 1,500,000 square feet of institutional uses. In addition, in 2020 a Sustainable Communities Environmental Assessment (SCEA) was approved for the Stadium District Sub-Area A Project, which creates the framework for the development of Sub-Area A of the Stadium District of the PTMU Overlay Zone pursuant to a Disposition and Development Agreement between the City of Anaheim and the Applicant and a Master Site Plan; refer to Table 1-2, SCEA Summary Table. It is acknowledged that two addenda were under preparation at the time of the preparation of this Addendum.

Table 1-1
SEIR No. 339 Addenda Summary Table

Addendum Title	Project Summary
Addendum 1: Katella Avenue/ Interstate 5 Undercrossing Improvements Project April 2012	Widen Katella Avenue at the undercrossing with the I-5 between Anaheim Way and Manchester Avenue and to create a fourth through lane of traffic in each direction of travel. Maintain dual left-turn pockets at both intersections. The project area spans approximately 1,000 feet along Katella Avenue, with an area of disturbance encompassing approximately 1.95 acres.



Addendum Title	Project Summary
Addendum 2: Platinum Gateway Project December 2012	Develop a 4-story wrap-style residential building with 399 dwelling units, a 5-story parking structure, and public park on 7.01 acres. Amend the <i>Anaheim General Plan</i> and the <i>Platinum Triangle Master Land Use Plan (PTMLUP)</i> to increase the total number of dwelling units to 18,988 dwelling units; reduce the commercial square footage to 4,795,111 square feet; reduce the office square footage to 14,131,103 square feet; and no change to institutional uses: 1,500,000 square feet.
Addendum 3: Platinum Vista Apartments Project October 2014	Develop a 5-story wrap-style residential apartment building with 389 units and a 6-story parking structure (including one subterranean parking level). Amend the <i>Anaheim General Plan</i> and the <i>PTMLUP</i> to allow up to 19,027 dwelling units; 4,735,111 square feet of commercial uses; 14,131,103 square feet of office uses; and 1,500,000 square feet of institutional uses.
Addendum 4: Amended A-Town Metro Master Site Plan August 2015	Construct eight neighborhood Development Areas ranging in size from 3.1 acres to 5.6 acres on the 43.2-acre site. Develop between 1,400 and 1,746 residential dwelling units; up to 50,000 square feet of commercial/retail uses; and two public parks.
Addendum 5: Jefferson Stadium Park Project June 2016	Develop a mixed-use community with 1,079 residential apartments; 14,600 square feet of retail uses; and a 1.11-acre public park. Building 1 is a 5-story wrap-style building with 370 units; Building 2 is a 5-story wrap-style building with 376 units; Building 3 is a 4-story podium building with 333 units and 14,600 square feet of retail space. Amend the <i>Anaheim General Plan</i> to relocate and combine two park sites into one park site. Amend the <i>PTMLUP</i> to allow for 18,909 dwelling units; 4,909,682 square feet of commercial uses; 14,340,522 square feet of office uses; and 1,500,000 square feet of institutional uses.
Addendum 6: LT Platinum Center Development Project September 2016	Mixed-use development with 405 dwelling units; 433,000 gross square feet of commercial uses; a 200-room hotel; 77,000 gross square feet of office uses. Amend the <i>Anaheim General Plan</i> and the <i>PTMLUP</i> to revise the district boundaries to change the LT Platinum Center site from the Gateway District to the Stadium District; reduce the maximum dwelling units to 17,348 units; increase the maximum commercial uses to 4,782,243 square feet; reduce the maximum office space to 9,180,747 square feet; and remove the designation of a public park from the site.
Addendum 7: Gene Autry Way and State College Boulevard Improvements Project March 2017	Widen Gene Autry Way from four lanes to six lanes with medians and storm drain and stormwater improvements; to widen the west side of State College Boulevard between Gateway Office and Artisan Court to accommodate a southbound right-turn lane and a third through-lane; and to make improvements to the east side of the intersection of State College Boulevard at Gene Autry Way, which is the west entrance to Angel Stadium of Anaheim (Angel Stadium). Additionally, a new intersection on Gene Autry at Union Street would be constructed to provide access to planned development areas.
Addendum 8: Orangewood Avenue Improvements (From State College Boulevard to the Santa Ana River) and Eastside of State College Boulevard Improvements (From Orangewood Avenue to Artisan Court) March 2018	Widen Orangewood Avenue from State College Boulevard to Dupont Drive and from Dupont Drive to the Santa Ana River from four lanes to six lanes with the addition of right-turn lanes. Widen State College Boulevard to four lanes between Orangewood Avenue and Artisan Court; north of Artisan Court, the outside lane would become a right-turn pocket into the Angel Stadium of Anaheim parking lots. Road widening to add a new northbound right-turn lane at the Orangewood Avenue Intersection with Rampart Street. Roadway improvements (sidewalk, relocated utilities, landscape planters, block walls, etc.) that were not considered in SEIR No. 339 are also analyzed.



Addendum Title	Project Summary
Addendum 9: Orangewood Avenue Improvements (From the Santa Ana River to East of SR-57) Subject Document	Subject Project: Widen Orangewood Avenue from a five - lane roadway to a six - lane divided facility to provide expanded bicycle and pedestrian access from the Santa Ana River to just east of State Route 57 (SR-57) at the SR-57/Orangewood Avenue interchange. The Proposed Project would also include a water pipe line connection in Orangewood Avenue right-of-way, generally beginning at Rampart Street and ending to the east at Eckhoff Street. In addition, the Proposed Project includes a change to the jurisdictional boundaries between the City of Anaheim and the City of Orange, west of the western levee of the Santa Ana River, north and south of Orangewood Avenue. This proposed reorganization includes amendments to the <i>Anaheim General Plan</i> , <i>Anaheim Zoning Map</i> , and <i>PTMLUP</i> , and other related documents to reflect the new City boundary and potential future use of the affected property.
Addendum 10: 710 E. Katella General Plan, Zoning Map and Platinum Triangle Master Land Use Plan (PTMLUP) Amendments (under preparation)	Amend the <i>Anaheim General Plan</i> , <i>Anaheim Zoning Map</i> , and <i>PTMLUP</i> to allow the development of up to 120 dwelling units at 710–818 East Katella Avenue and 1815 South Lewis Street. Development of the project site would be subject to the requirements of the Platinum Triangle Mixed Use (PTMU) Overlay Zone, including but not limited to, subsequent City Council approval of a Development Agreement.
Addendum 11: OC Vibe Project General Plan, Zoning Map and Platinum Triangle Master Land Use Plan (PTMLUP) Amendments (under preparation)	Amend the <i>Anaheim General Plan</i> , <i>Anaheim Zoning Map</i> , and <i>PTMLUP</i> to allow the development of proposed new homes, shopping, dining, entertainment, parks and open spaces around Honda Center and ARTIC transit center

Table 1-2
SCEA Summary Table

Addendum Title	Project Summary														
SCEA: Stadium District Sub-Area A Project September 2020	The Stadium District Sub-Area A Project creates the framework for the development of Sub-Area A of the Stadium District of the PTMU Overlay Zone pursuant to a Disposition and Development Agreement between the City of Anaheim and the Applicant and a Master Site Plan to allow development of Sub-Area of the Stadium District with up to the development intensities described. <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: center;">Land Use</th> <th style="text-align: center;">Stadium District Sub-Area A Project</th> </tr> </thead> <tbody> <tr> <td>Residential (dwelling units)</td> <td style="text-align: center;">5,175</td> </tr> <tr> <td>Commercial (square feet)</td> <td style="text-align: center;">1,750,000</td> </tr> <tr> <td>Office (square feet)</td> <td style="text-align: center;">2,700,000</td> </tr> <tr> <td>Stadium (seats)</td> <td style="text-align: center;">45,500</td> </tr> <tr> <td>Public Parks (acres)</td> <td style="text-align: center;">10-13</td> </tr> <tr> <td>Fire Station</td> <td style="text-align: center;">One station on 1.5 acres</td> </tr> </tbody> </table>	Land Use	Stadium District Sub-Area A Project	Residential (dwelling units)	5,175	Commercial (square feet)	1,750,000	Office (square feet)	2,700,000	Stadium (seats)	45,500	Public Parks (acres)	10-13	Fire Station	One station on 1.5 acres
Land Use	Stadium District Sub-Area A Project														
Residential (dwelling units)	5,175														
Commercial (square feet)	1,750,000														
Office (square feet)	2,700,000														
Stadium (seats)	45,500														
Public Parks (acres)	10-13														
Fire Station	One station on 1.5 acres														



1.4 FORMAT AND CONTENT OF THIS ADDENDUM

The following components comprise this Addendum:

- a. Section 1.0, Introduction and Section 2.0, Project Description.
- b. The completed Environmental Checklist and its associated analyses (Section 3.0), which conclude that the Proposed Project would not result in any new significant environmental impacts or substantially increase the severity of environmental impacts beyond the levels disclosed in SEIR No. 339.
- c. Technical reports and other documentation that evaluate the Proposed Project and/or Project Site, which are appendices to this Addendum:
 - Appendix A, Biological Resources Assessment (Michael Baker International, September 2017);
 - Appendix B, Jurisdictional Delineation (Michael Baker International, January 2018);
 - Appendix C, Phase I Environmental Site Assessment (Michael Baker International, October 2017); and
 - Appendix D, Basis of Design Report (Michael Baker International, March 2020).

1.5 ENVIRONMENTAL CHECKLIST

The City prepared the Proposed Project's Environmental Checklist per *CEQA Guidelines* Section 15063(d)(3) and Section 15168(c)(4). The *CEQA Guidelines* include a suggested checklist to indicate whether the conditions set forth in its Section 15162, which would require a Subsequent or Supplemental EIR, are met, and whether there would be new significant impacts resulting from the Project not examined in SEIR No. 339. The checklist is found in Section 3.0 of this Addendum, along with an explanation and discussion of each significance determination made in the checklist.

For this Addendum, four possible responses to each of the individual environmental issue areas are included on the checklist:

1. New Significant Impact. This response indicates when the currently Proposed Project has changed to such an extent that major revisions of SEIR No. 339 are required due to the presence of new significant environmental effects.
2. More Severe Impacts. This response indicates when the circumstances under which the currently Proposed Project is undertaken have changed to such an extent that major revisions of SEIR No. 339 are required because the severity of previously identified significant effects would substantially increase.
3. New Ability to Substantially Reduce Significant Impact. This response indicates when new information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time SEIR No. 339 was certified indicates that there



are new mitigation measures or alternatives available to substantially reduce significant environmental impacts of the currently Proposed Project.

4. *No Substantial Change from Previous Analysis.* This response indicates that the currently Proposed Project would not create a new impact or substantially increase the severity of the previously identified environmental impact disclosed in SEIR No. 339.

The Environmental Checklist and accompanying explanation of checklist responses provide the information and analysis necessary to assess relative environmental impacts of the currently Proposed Project in the context of environmental impacts addressed in SEIR No. 339. In doing so, the City will determine the extent of additional environmental review, if any, for the currently Proposed Project.

1.6 DOCUMENTS INCORPORATED BY REFERENCE

CEQA Guidelines Sections 15150 and 15168(c)(3) and (d)(2) permit and encourage environmental documents to incorporate by reference other documents that provide relevant data. The following documents are incorporated by reference herein and are available for review upon request at the City of Anaheim (online via email to planning@anaheim.net or by phone [714] 765-5139) or City of Orange (online via email to CDInfo@cityoforange.org or by phone [714] 744-7220):

General Plan for the City of Anaheim: The *General Plan for the City of Anaheim (Anaheim General Plan)*, dated May 2004, is a comprehensive, long-term plan that is a blueprint for the City of Anaheim's growth and development. It covers issues ranging from the physical development of the jurisdiction, such as general locations, and extent of land uses and supporting infrastructure, to social concerns. It is organized into ten Elements (Land Use, Circulation, Green, Public Services and Facilities, Growth Management, Safety, Noise, Economic Development, Housing, and Community Design Elements) that address a wide range of subjects and provide goals and policies.

Anaheim General Plan and Zoning Code Update Environmental Impact Report No. 330, State Clearinghouse Number 2003041105: The *Anaheim General Plan and Zoning Code Update Environmental Impact Report No. 330, State Clearinghouse Number 2003041105 (Anaheim General Plan EIR)*, certified May 25, 2004, prepared by The Planning Center, addressed the environmental effects associated with the implementation of the *Anaheim General Plan* and *City of Anaheim Zoning Code Update*. It provided information pertaining to existing and future environmental settings within the City's jurisdiction.

Anaheim Municipal Code: The *Anaheim Municipal Code*, current through Ordinance 6480, passed March 10, 2020, consists of regulatory, penal, and administrative ordinances of the City of Anaheim. These include standards intended to regulate land use, development, health and sanitation, water quality, public facilities, and public safety. Title 18 of the *Anaheim Municipal Code, Zoning (Anaheim Zoning Code)*, is utilized to promote growth of the City in an orderly manner, and to promote and protect the public health, safety, peace, comfort, and general welfare in conformance with the *Anaheim General Plan*.

The Platinum Triangle Master Land Use Plan, August 2004, EDAW, Inc., as amended: The *Platinum Triangle Master Land Use Plan (PTMLUP)*, dated August 2004, as amended, prepared by EDAW, Inc., serves as the blueprint for development within the Platinum Triangle. It establishes planning principles, applicable land use policies, allowable development intensities, and design guidelines.



The Platinum Triangle Subsequent EIR No. 332, State Clearinghouse No. 2004121045: The Platinum Triangle Subsequent EIR No. 332, State Clearinghouse No. 2004121045 (SEIR No. 332), dated 2005, prepared by The Planning Center, addressed the environmental effects associated with adopting the PTMLUP. It provided information pertaining to existing and future environmental settings within the City's jurisdiction.

The Revised Platinum Triangle Expansion Project Subsequent Environmental Impact Report No. 339, August 2010, The Planning Center: The Revised Platinum Triangle Expansion Project Subsequent Environmental Impact Report No. 339 (SEIR No. 339), dated 2005, prepared by The Planning Center, addressed the environmental effects associated with the implementation of the Revised Platinum Triangle Expansion Project (herein referenced as the Approved Project) in the City of Anaheim, California. The City of Anaheim proposed to increase the amount of residential, commercial, office, and institutional development intensities permitted in the Platinum Triangle. The Approved Project reduced the amount of office and commercial square footage and increased the number of residential units being requested as compared to the previous Platinum Triangle Expansion Project analyzed in Final SEIR No. 334. These modifications were made to improve the overall jobs/housing balance in the Platinum Triangle at buildout, encourage a full range of transit-oriented development opportunities for the Anaheim Regional Transportation Intermodal Center (ARTIC), and reduce traffic impacts to the City of Orange. Since this time, the SEIR No. 339 has been amended as a result of eight subsequent addenda.

Platinum Triangle Implementation Plan: The City of Anaheim Public Works Department drafted the Platinum Triangle Implementation Plan (PTIP), originally drafted in August 2006, and subsequently updated most recently as Update No. 4, dated March 2016. The PTIP was based on the PTMLUP and associated documentation and includes descriptions of necessary street, sewer, and storm drain improvements to support PTMLUP development. The PTIP is intended as a planning tool for programming and funding decisions based on development patterns and intensity and foreseeable revenue streams available.

Orange General Plan: The Orange General Plan, dated March 2010, is the primary source of long-range planning and policy direction that is used to guide growth and change, and to preserve and enhance the quality of life within the City of Orange. It is organized into 11 Elements (Land Use, Circulation and Mobility, Housing, Natural Resources, Public Safety, Noise, Cultural Resources and Historic Preservation, Infrastructure, Economic Development, Urban Design, and Growth Management Elements) that address a wide range of subjects and provide goals and policies.

Orange General Plan Program Environmental Impact Report: The Orange General Plan Program Environmental Impact Report (Orange General Plan PEIR), State Clearinghouse No. 2006031117, dated March 2010, prepared by EDAW, Inc., addressed the environmental effects associated with the implementation of the Orange General Plan and City of Orange Zoning Code Update (Orange Zoning Code). It provided information pertaining to existing and future environmental settings within the City's jurisdiction.

Orange Municipal Code: The Orange Municipal Code, current through Ordinance No. 06-20, adopted February 11, 2020 (Supp. No. 42, 4/20), consists of regulatory, penal, and administrative ordinances of the City of Orange. These include standards intended to regulate land use, development, health and sanitation, water quality, public facilities, and public safety. Title 17 of the Orange Municipal Code, Zoning (Orange Zoning Code), is utilized to promote public safety, health, convenience, comfort, prosperity, or general welfare.



2.0 PROJECT DESCRIPTION

2.1 PROJECT LOCATION

The Proposed Project is west of, the SR-57/Orangewood Avenue interchange, approximately 0.63-mile east of I-5; refer to [Exhibit 2-1, *Regional Vicinity*](#), and [Exhibit 2-2, *Site Vicinity*](#). Specifically, the Project Site is located in the City of Anaheim and the City of Orange, within Orange County Flood Control District (OCFCD) rights-of-way. The municipal boundary for the cities of Anaheim and Orange is along the western right-of-way boundary of the Santa Ana River. Although the Project Site is in both the City of Anaheim and the City of Orange, the City of Anaheim is the Project sponsor, and the Lead Agency for the purposes of CEQA. The SR-57/Orangewood Avenue interchange serves as a major gateway to the City of Anaheim and the Project would serve future increases in vehicles in the Project areas because of future development of Platinum Triangle in the City of Anaheim.

2.2 ENVIRONMENTAL SETTING

The Project Site and surrounding vicinity is located within an urbanized area of the cities of Orange and Anaheim. Currently, the Project Site encompasses Orangewood Avenue, with five travel lanes (two westbound lanes and three eastbound lanes). In addition, the Proposed Project includes a change to the jurisdictional boundaries between the City of Anaheim and the City of Orange, west of the western levee of the Santa Ana River, north and south of Orangewood Avenue, from the southern City of Anaheim boundary to the SR-57. The Santa Ana River traverses the western portion of the Project Site and flows in a southern direction. The Santa Ana River Trail includes existing paved bike and pedestrian trail access along both sides of the Santa Ana River. Orangewood Avenue provides access to the trail from the west side of the Santa Ana River. At the Santa Ana River, Orangewood Avenue consists of an existing bridge structure constructed in 1966 and widened in 1981 (on the south side only). The trail under-crosses the Orangewood Avenue bridge structure in this location. To the east of the Orangewood Avenue bridge structure, the SR-57/Orangewood Avenue interchange, which includes the Orangewood Avenue Undercrossing bridge structure, is present.

Existing land uses near the Project Site consist of the following institutional and commercial uses:

- ***North:*** Upstream areas of the Santa Ana River are present to the north. SR-57 also continues north of the Project Site. Both City of Anaheim and City of Orange planning documents identify the Santa Ana River; however, the river in this location is located within the City of Orange. The *Anaheim General Plan* designates the Santa Ana River as Open Space; however, since it is not located within the City of Anaheim, the *Anaheim Municipal Code* does not identify a zone for this area. The *Orange Zoning Code* zones the Santa Ana River as Recreational Open Space (R-O), and the *Orange General Plan* designates the site as Open Space (OS). Angel Stadium of Anaheim [Angel Stadium]) and the associated parking lot are located to the north of the Project Site. The *Anaheim General Plan* designates this property for Mixed-Use Urban Core land use, and it is within "PR" Public Recreational Zone and Sub-Area A of the Stadium District of the PTMU Overlay Zone of the *Anaheim Zoning Map*. Commercial/office uses are present to the north of the eastern portion of the Project Site, within the City of Orange; the *Orange General Plan* designates these properties for Neighborhood Office Professional (NOP) land use at a maximum 0.5 FAR; and, they are within the Office Professional (O-P) Zone of the *Orange Zoning Map*.



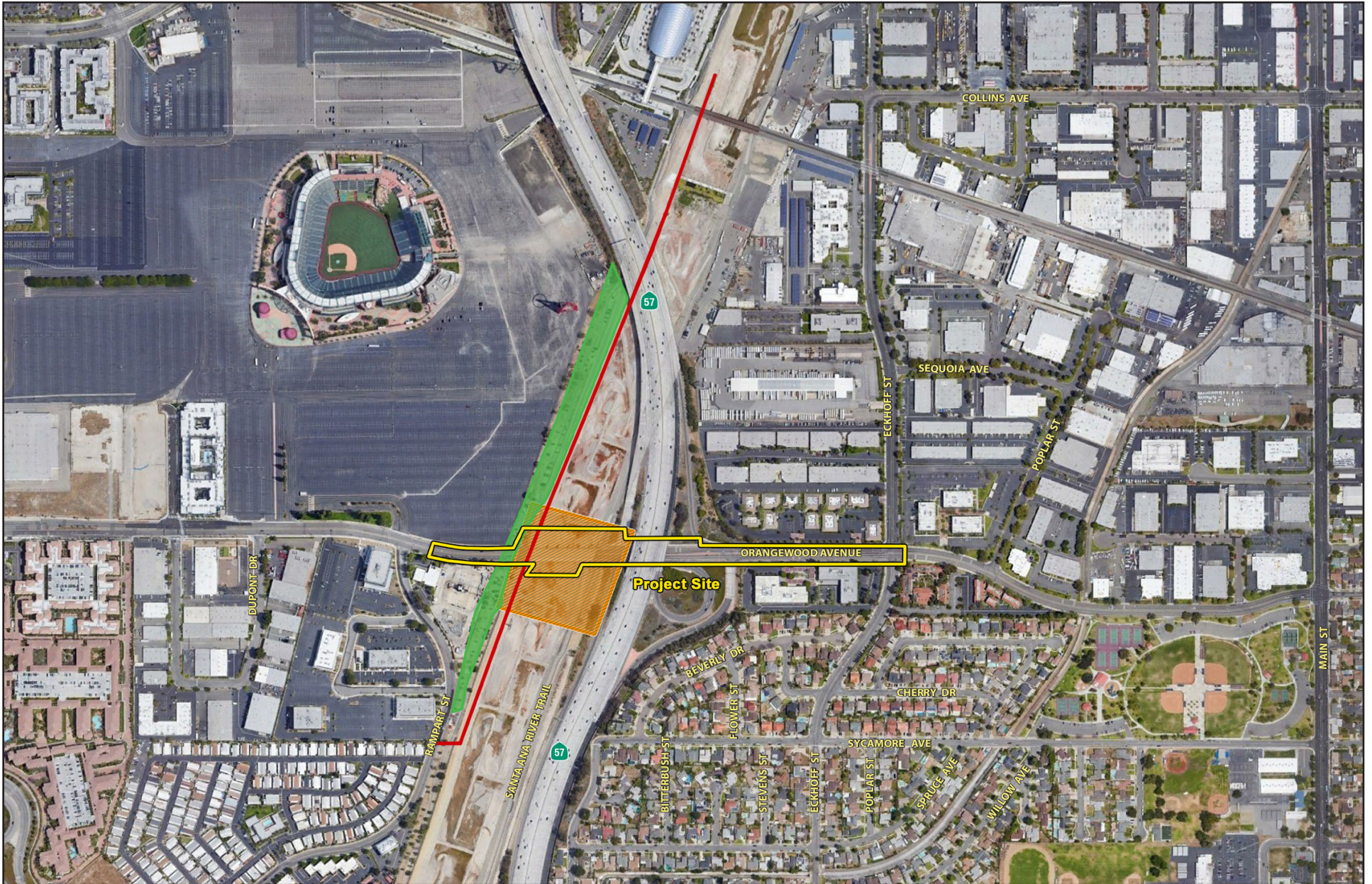
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ORANGEWOOD AVENUE IMPROVEMENTS
SUBSEQUENT ENVIRONMENTAL IMPACT REPORT ADDENDUM

Regional Vicinity



Source: Aerial - Google Earth Pro, June 2021.

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- Temporary Impacts
- Permanent Impacts

- Proposed City Boundary
- Santa Ana River Reorganization Area

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ORANGEWOOD AVENUE IMPROVEMENTS
 SUBSEQUENT ENVIRONMENTAL IMPACT REPORT ADDENDUM
Site Vicinity

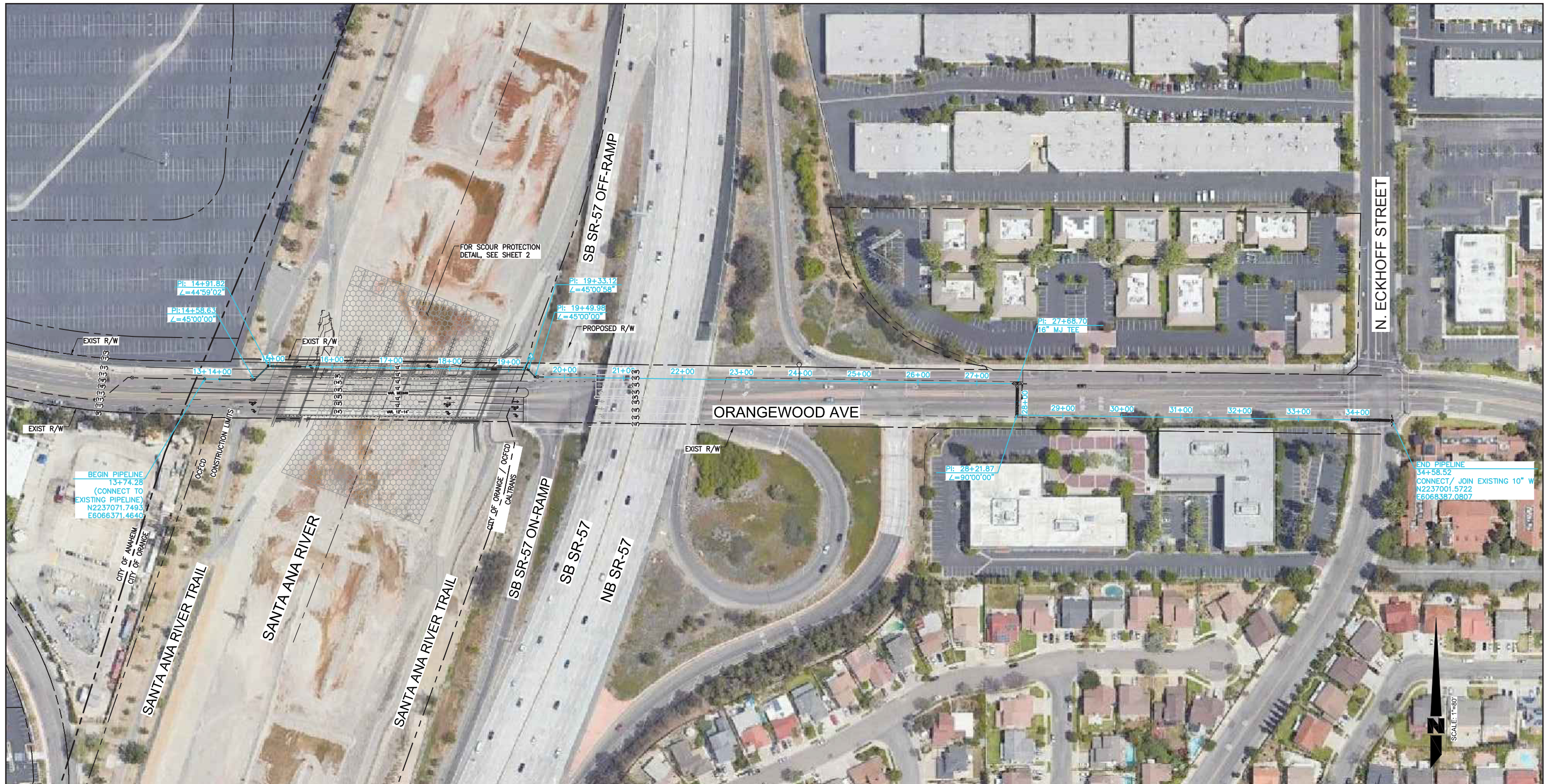


- **East:** Orangewood Avenue continues east of the Project Site. Commercial (office) uses are present to the east of the Project Site. These properties are within the City of Orange; the *Orange General Plan* designates these properties for NOP land use; and the properties are within the O-P and Commercial Professional (C-P) Zone of the *Orange Zoning Map*.
- **South:** The North Net Fire Training Facility is located southwest of the Project Site. This property is within the City of Anaheim; the *Anaheim General Plan* designates this property for Mixed-Use Urban Core land use; and, it is within the “PR” Public Recreational Zone and Sub-Area B of the Orangewood District of the PTMU Overlay Zone of the *Anaheim Zoning Map*. The Santa Ana River flows south of the Project Site. The *Anaheim General Plan* designates this area for Open Space land use; as discussed above, the property is not within any identified zone on the *Anaheim Zoning Map*. This area is also within the R-O Zone of the *Orange Zoning Map*, and designated as OS in the *Orange General Plan*. SR-57 is also present to the south of the Project Site. Further southeast of the interchange, single-family residential uses (designated by the *Orange General Plan* as Low Density Residential 02-6 DU/AC [LDR] and zoned by the *Orange Zoning Code* as Single Family Residential 6,000 square feet [R-1-6]) are present.
- **West:** Orangewood Avenue continues west of the Project Site. Commercial, office, and industrial uses (Karl Strauss Brewing Company and the Orangewood Stadium Business Park) are present to the southwest of the Project Site. The *Anaheim General Plan* designates these properties for Mixed-Use Urban Code land-use; the properties are within the “C-G” General Commercial, “O-L” Low-Intensity Office, “I” industrial Zones, and Sub-Area A of the Orangewood District of the PTMU Overlay Zone of the *Anaheim Zoning Map*.

2.3 PROPOSED PROJECT

The City proposes to widen Orangewood Avenue from a five-lane roadway to a six-lane divided facility to provide expanded vehicle, bicycle, and pedestrian access; refer to [Exhibit 2-3, Site Plan](#). The Proposed Project would incorporate an additional westbound through lane through the Project Site boundaries. In order to widen the roadway, the Project would widen the existing Orangewood Avenue bridge structure over the Santa Ana River. Bridge widening improvements would involve widening the bridge approximately 30 to 35 feet on the north side to accommodate the proposed six travel lanes and associated bicycle lane/sidewalk. The proposed total bridge length would be 348 feet, 6 inches. In addition, the Proposed Project includes a change to the jurisdictional boundaries between the City of Anaheim and the City of Orange, west of the western levee of the Santa Ana River, north and south of Orangewood Avenue. This proposed reorganization includes amendments to the General Plan, Zoning Map, PTMLUP, and other related documents to reflect the new City boundary and potential future use of the affected property.

SEIR No. 339 describes roadway improvements for potential intersection mitigation and fair-share improvements necessary for development of Platinum Triangle (referenced herein as the “Approved Project”). Upon certification of *SEIR No. 339*, the City of Anaheim prepared the *Platinum Triangle Implementation Plan (PTIP)*. As discussed in [Section 1.6, Documents Incorporated by Reference](#), the PTIP includes descriptions of necessary street, sewer, and storm drain improvements to support PTMLUP development. As such, the PTIP, and associated *SEIR No. 339*, considered development of necessary street improvements, which included “Project 3D”, the widening of Orangewood Avenue from the City’s municipal boundaries to the SR-57 interchange; refer to [Exhibit 2-4, Platinum Triangle Implementation Plan – Orangewood Avenue Improvements](#). The PTIP proposed these improvements to ensure



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Michael Baker
INTERNATIONAL

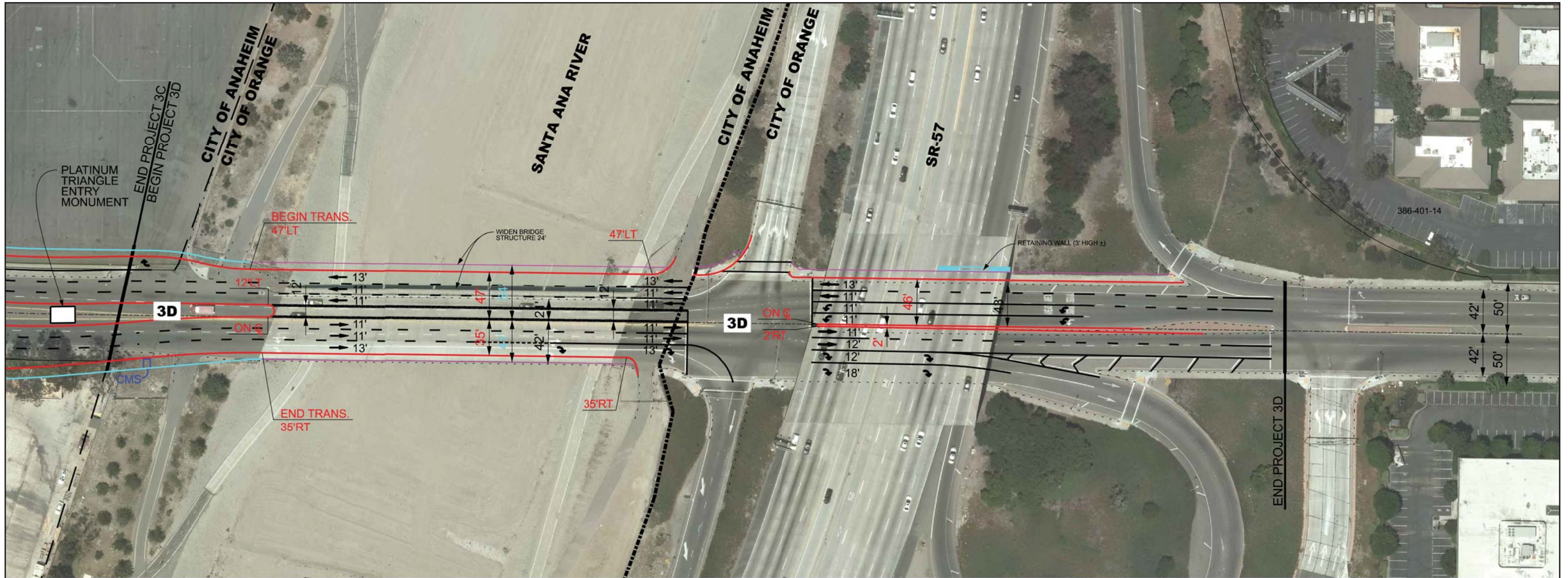


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ORANGEWOOD AVENUE IMPROVEMENTS
SUBSEQUENT ENVIRONMENTAL IMPACT REPORT ADDENDUM

Site Plan

Exhibit 2-3



LEGEND			
	EXISTING CURB		EXISTING CURB LINE DIMENSION
	PROPOSED CURB LINE		PROPOSED RIGHT OF WAY DIMENSION
	PROPOSED STRIPING		PROPOSED CURB LINE DIMENSION
	PROPOSED RIGHT OF WAY		EXISTING PARCEL OWNER AND NUMBER
	EXISTING RIGHT OF WAY AND PROPERTY LINE		EXISTING / PROPOSED TRAFFIC SIGNAL
	PROPOSED RIGHT OF WAY ACQUISITION		APPROVED DEVELOPMENT BOUNDARIES
	PROPOSED BUS STOP WITH CONCRETE PAD		
	RW DEDICATED (BY DEVELOPER)		
	PROPOSED BRIDGE WIDENING		

Source: City of Anaheim, Platinum Triangle Implementation Plan Orangewood Avenue Alignment East City Limit to 400'E/O SR-57, Sheets O-4 and O-5, dated October 2015.

NOT TO SCALE



ORANGEWOOD AVENUE IMPROVEMENTS
SUBSEQUENT ENVIRONMENTAL IMPACT REPORT ADDENDUM

Platinum Triangle Implementation Plan - Orangewood Avenue Improvements



acceptable operations through the area and accommodate the Approved Project's land use intensities. Project 3D improvements (the Approved Project) addressed under *SEIR No. 339* included widening the existing Orangewood Avenue bridge structure 24 feet, from five lanes (71 feet width) to six lanes (95 feet width). The Approved Project proposed widening with the addition of a new westbound travel lane beginning at the City of Anaheim municipal boundary and trending east, ending just west of the SR-57/Orangewood Avenue northbound off-ramp. The roadway widening would occur along a segment of the existing roadway, spanning approximately a half mile. Project 3D also proposed the installation of an approximately 70-foot long, three-foot-tall retaining wall within Caltrans jurisdiction along the north side of the Orangewood Avenue Undercrossing.

This Addendum identifies specific project changes that are necessary to accommodate the existing and proposed *PTMLUP* development intensities. These changes include additional widening of the bridge structure over the Santa Ana River, new property acquisition in OCFCD right-of-way, Santa Ana River Trail realignment, drainage facility relocation in the Santa Ana River, a water pipe line connection, and a change to the jurisdictional boundaries of land along the Santa Ana River more particularly described below. This Project, as proposed, would not construct the widening and retaining wall within Caltrans right-of-way, which were considered as part of the Approved Project. The specific Project design information, not known at the time of certification of the *SEIR No. 339*, is available at this time and detailed in [Section 2.3.1, *Orangewood Avenue Right-Of-Way Acquisition*](#), through [Section 2.3.4, *Pipe Line Connection*](#), below.

As referenced in the previous paragraph, the Proposed Project includes a realignment of a portion of the municipal boundary between the City of Anaheim and City of Orange along the Santa Ana River between approximately 1,000 feet south of Orangewood Avenue and approximately 1,000 feet south of Katella Avenue. The boundary adjustment would annex outside land from the City of Orange, into the City of Anaheim's city boundaries. Prior to the review and approval of the reorganization by the Orange County Local Agency Formation Commission (LAFCO), the City is required to amend its General Plan and Zoning Map ("Reclassification") to reflect the intended use of the subject properties (as described below, in [Section 2.3.6, *Santa Ana River Reorganization*](#)). This process has already been completed for a portion of the Angel Stadium property, referred to as Area 2A (Stadium Sliver) and has yet to be completed for the remainder of the area subject to the boundary reorganization; however, all properties are within the City's sphere of influence and designated for certain land uses in the City's General Plan. As shown below in [Section 2.3.6 Table 2-1, *Santa Ana River Reorganization*](#), indicates the General Plan and Reclassifications that are a part of the Proposed Project. In addition to amendments to the General Plan Land Use Element and the Zoning Map, the Proposed Project would amend the City boundaries, as depicted in the General Plan and on the Zoning Map, to reflect the reorganization; and, amend the Platinum Triangle Master Land Use Plan, to expand the boundaries of the Platinum Triangle to incorporate the Proposed Project.

SEIR No. 339 Section 4.3.1, *Location and Land Use*, describes the Platinum Triangle as:

"The Platinum Triangle is an 820-acre area located within the City of Anaheim. The project area is comprised of the Angel Stadium of Anaheim, Honda Center, the Anaheim Stadium Metrolink/Amtrak Station, various light industrial uses, industrial parks, distribution facilities, offices, hotels, public recreation areas, and residential and supporting retail uses. The project area is bounded by the Santa Ana River to the east, the Anaheim City Limit to the south (approximately Orangewood Avenue and State College Boulevard), I-5 to the west, SR-57 to the east, and the Southern California Edison easement (approximately Cerritos Avenue) to the north. The project area is accessible by motor vehicles from I-5, SR-57, Katella Avenue, State College



Boulevard, Orangewood Avenue, Lewis Street, and Anaheim Way. Additional access is provided through the Anaheim Stadium Metrolink/Amtrak station adjacent to the stadium.”

The proposed realignment of a portion of the city boundary between the City of Anaheim and City of Orange, would maintain the eastern boundary of the Platinum Triangle as the Santa Ana River. However, the Proposed Project would slightly increase the area of the Platinum Triangle to encompass the portion of the property currently within City of Orange that is the subject of this realignment. As described in [Section 2.3.6](#), the Proposed Project would amend the General Plan, Zoning Map, and Platinum Triangle Master Land Use Plan to reflect the anticipated future use of this area within the City of Anaheim. As described in this Addendum, the implementation of these amendments would result in nominal changes in land use in comparison to the existing use and future use of the subject area, as currently permitted by General Plan, Zoning, and Platinum Triangle Master Land Use Plan.

2.3.1 ORANGEWOOD AVENUE RIGHT-OF-WAY ACQUISITION

The Approved Project considered the widening of Orangewood Avenue from the City’s municipal boundaries to the SR-57 interchange within the existing roadway right-of-way; refer to [Exhibit 2-4](#). However, to accommodate these improvements, the City would need to acquire new right-of-way from OCFCD. Construction activities associated with the Orangewood Avenue right-of-way acquisition would temporarily impact an approximately 1.12-acre area of the Santa Ana River. Temporary activities occurring within this area would include placement of shoring, driving of foundation piles, construction of bent caps and piers, construction of the bridge, scour countermeasure (e.g., modified bridge footings or placement of a permeable articulated concrete block [ACB] mat, or other alternative), and relocation of an existing drainage outfall.

Although the Project would require some areas of permanent take within the Santa Ana River, the Project would not require any permanent right-of-way acquisition of private properties. Other than those improvements within the Santa Ana River, all permanent improvements would occur within existing roadway rights-of-way.

2.3.2 BRIDGE STRUCTURE IMPROVEMENTS

The Approved Project considered widening the bridge structure by 24 feet and restriping the roadway to accommodate an additional westbound travel lane. However, the Proposed Project would widen the north side of the Orangewood Avenue bridge structure over the Santa Ana River approximately 30 to 35 feet to accommodate the bicycle and sidewalk facilities. The proposed total bridge length would be 348 feet, 6 inches. The Proposed Project would expand six existing bridge pier walls and install five new debris noses to support the proposed bridge widening.

2.3.3 TRAIL AND STORMWATER FACILITY IMPROVEMENTS

The Approved Project did not specifically consider necessary improvements in order to maintain existing access to the Santa Ana River Trail and stormwater facilities. In order to accommodate the new bridge widening, the Santa Ana River Trail would need to be realigned along the western portion of the Santa Ana River, and reconstructed in-place at the eastern portion. New retaining walls would be installed along the eastern portion of the trail under the widened Orangewood Avenue bridge structure. Also, the existing drainage facility located at the eastern portion of the Santa Ana River would need to be relocated



slightly north of the existing location; as depicted on [Exhibit 2-3](#). Existing access to the Santa Ana River Trail from Orangewood Avenue would be maintained.

2.3.4 PIPE LINE CONNECTION

The Approved Project considered construction of new subsurface water facilities in Orangewood Avenue right-of-way (a proposed 16-inch water pipe line) as far east as the City's municipal boundary (*PTIP* Project 3C). However, the Approved Project did not consider extension of this 16-inch pipe line through the Project site. The Proposed Project would construct a new 16-inch ductile iron water pipe line in Orangewood Avenue right-of-way, generally beginning at the City's municipal boundary and ending to the east at Eckhoff Street. This new pipe line would connect the proposed 16-inch water pipe line, being constructed as *PTIP* Project 3C, to the existing 10-inch water pipe line in the City of Orange (in Eckhoff Street right-of-way). The new pipe line connection would enhance the City of Orange's existing water system, providing redundancy should failure arise in other areas of the system. The water line would affect an approximately half-mile segment of Orangewood Avenue as shown on [Exhibit 2-3](#).

2.3.5 CONSTRUCTION AND PHASING

Construction activities associated with the Proposed Project would occur following acquisition of the required parcels. The Project proposes a 12-month construction period (anticipated to begin March 2022 and completed by February 2023).

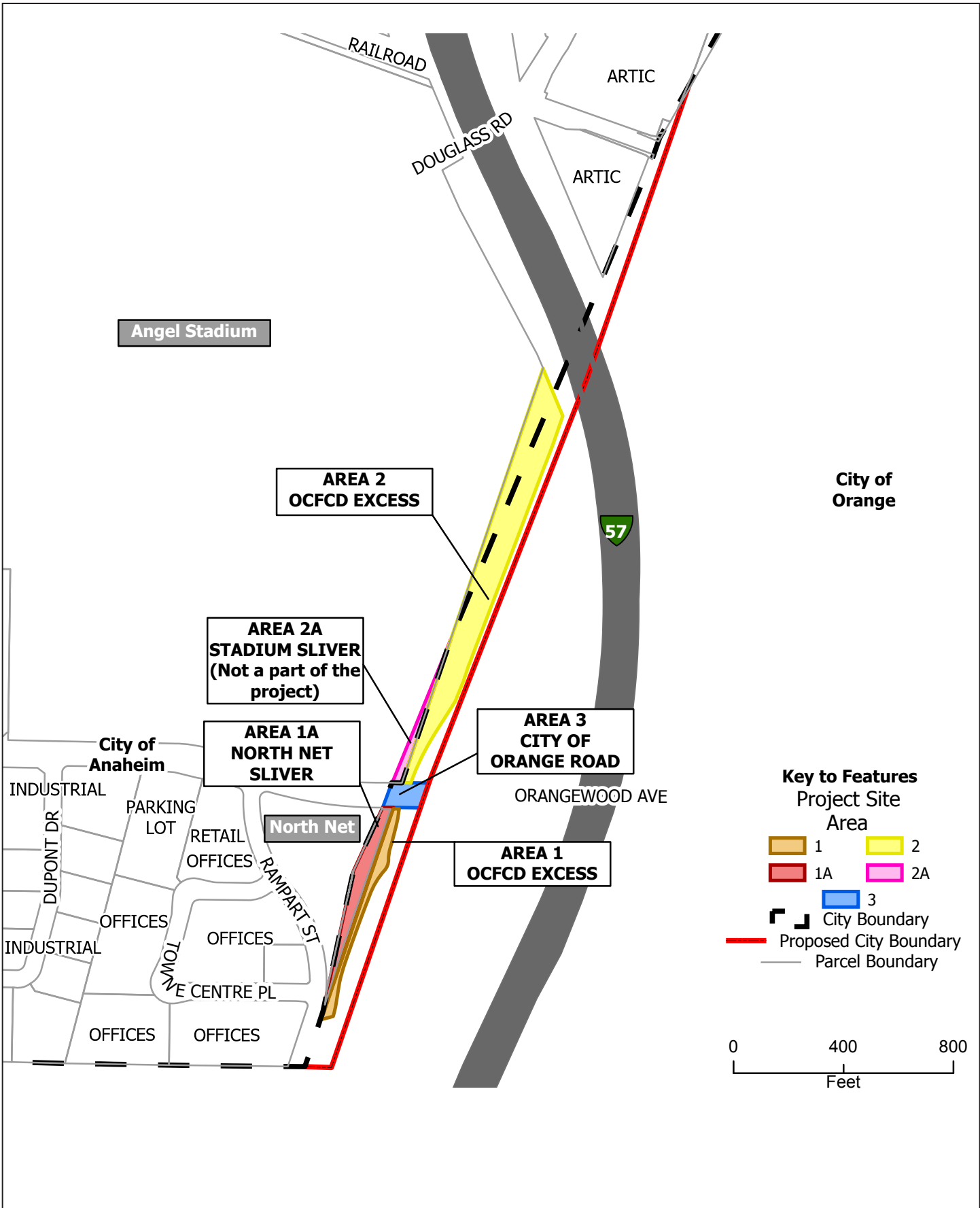
2.3.6 SANTA ANA RIVER REORGANIZATION

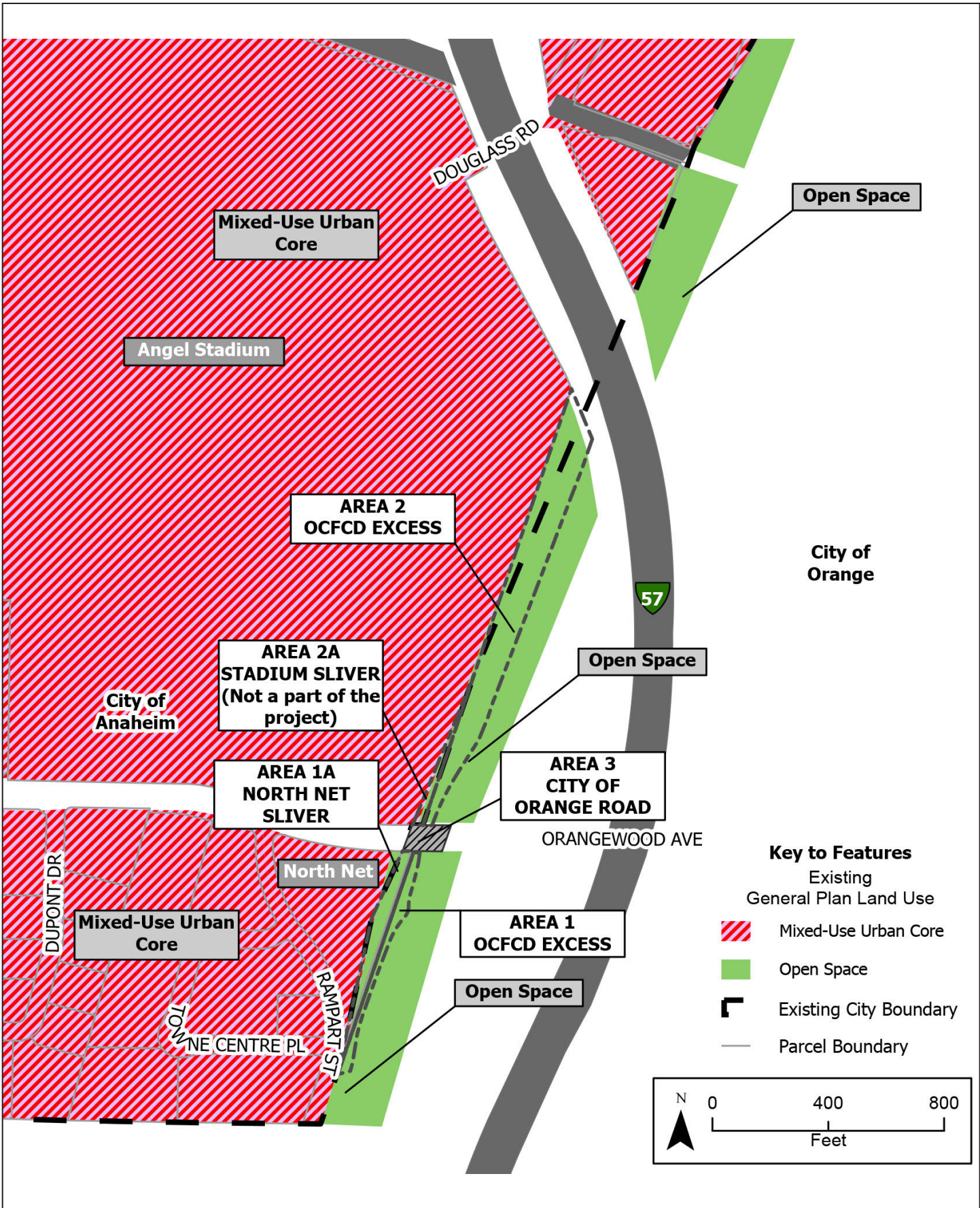
The Project proposes to reorganize land within the Project area through a municipal boundary adjustment within the Project limits to annex land outside of the City limits (currently in the City of Orange) into the City of Anaheim, incorporating properties within the City's sphere of influence and expanding the boundaries of Platinum Triangle; see [Exhibit 2-5](#), [Santa Ana River Reorganization Area](#). The proposed boundary adjustment would require review and approval by the LAFCO. Prior to review and approval of the boundary adjustment by the LAFCO, the City is required to amend the land use designations and zoning on the properties proposed for annexation to reflect their intended uses. As such, [Table 2-1](#), [Santa Ana River Reorganization](#), shows the existing and proposed land use designations and zoning for the areas proposed for annexation.

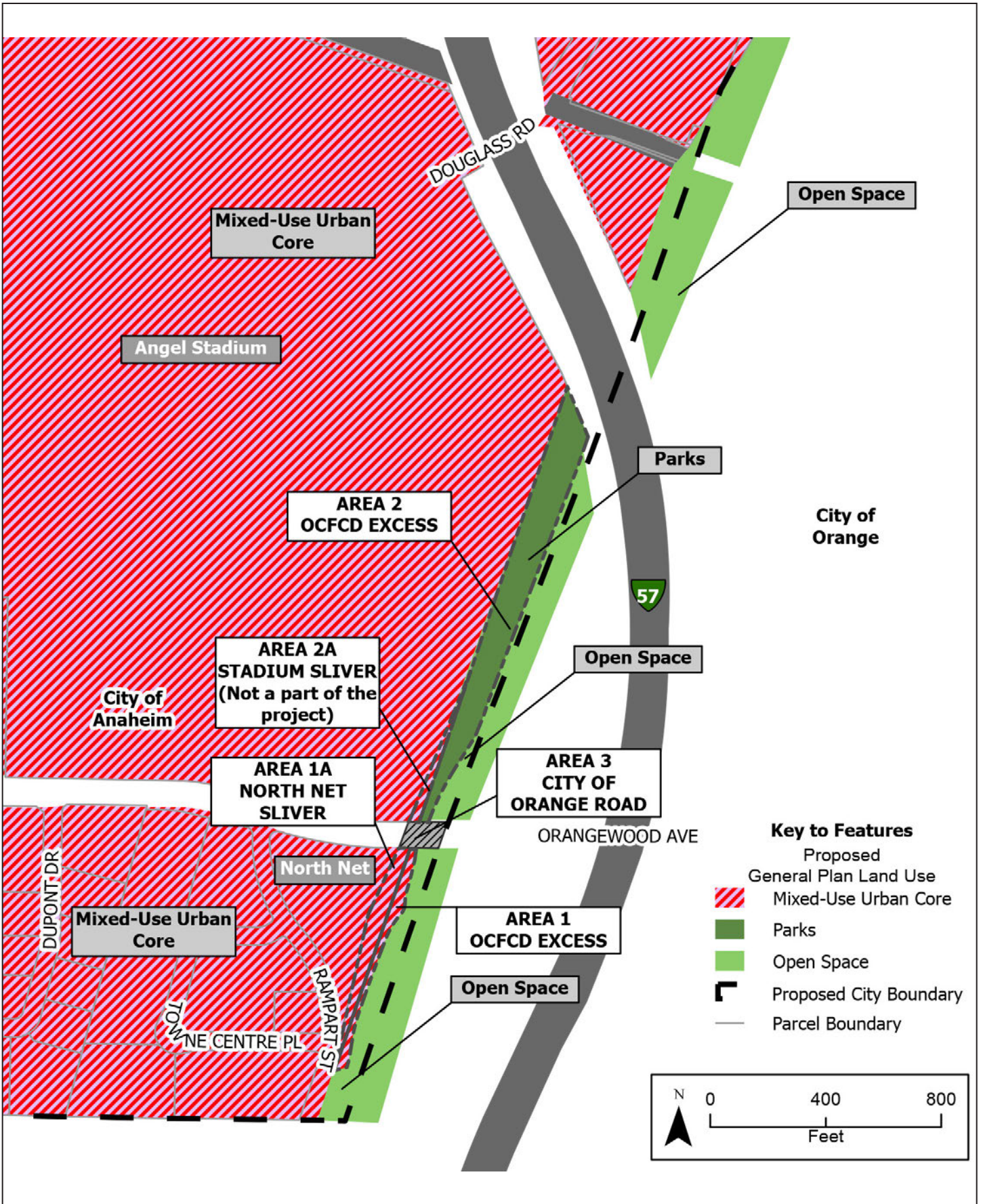
Area 1A and Area 1

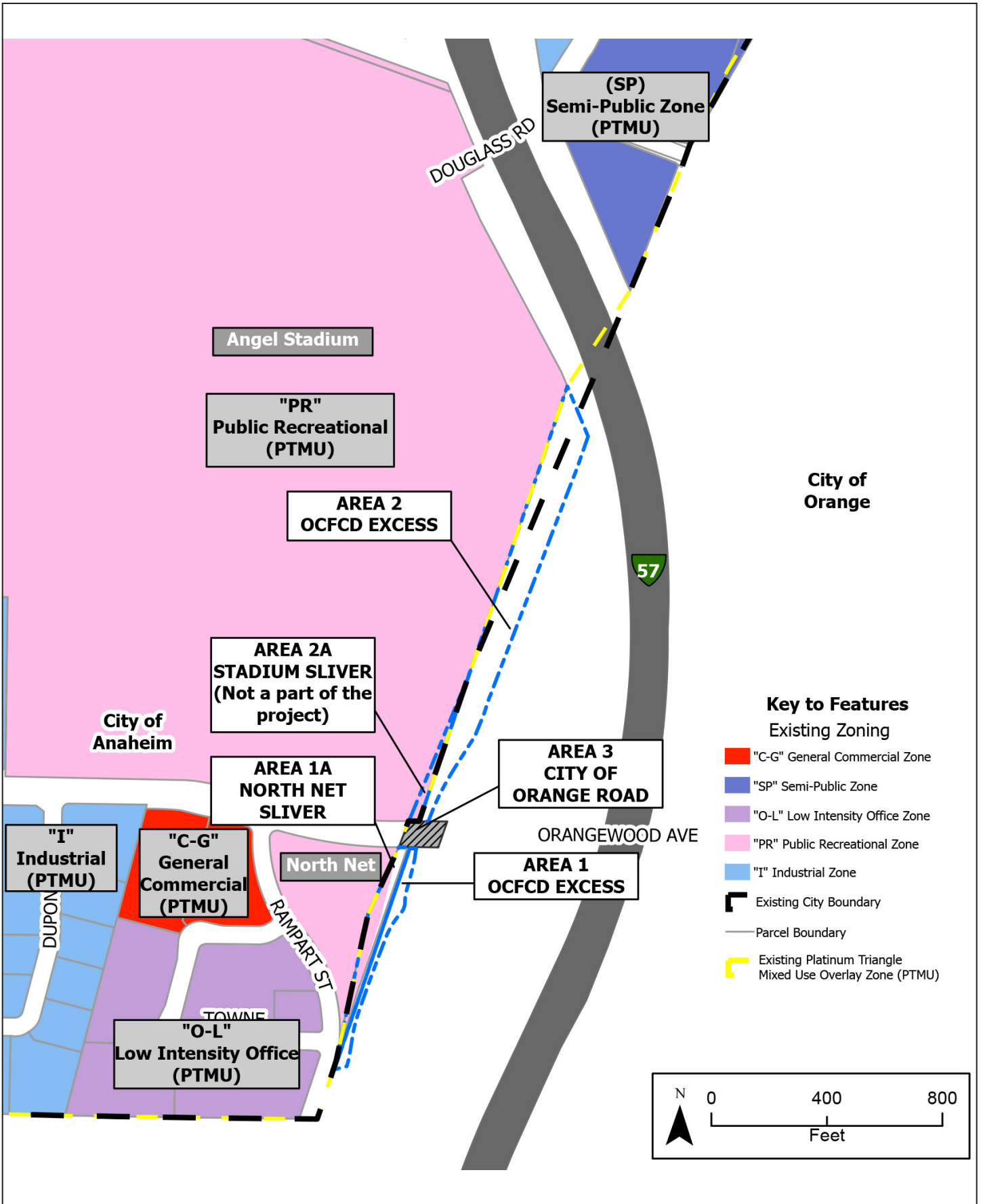
As shown on [Exhibit 2-5](#), "Area 1A North Net Sliver" (Area 1A) and "Area 1 OCFCF Excess" (Area 1) are located south of Orangewood Avenue and bound by North Net Training Center (2400 Orangewood Avenue) to the west and the Santa Ana River Trail to the east. The proposed reorganization would realign a sliver of the North Net Training Center property to allow the entire parcel to be located within the Anaheim city limits. This sliver would continue to provide operational use for the North Net Training Center and would be incorporated with the proposed acquisition. North Net is currently in the process of acquiring property from OCFCF for its continued use.

As shown on [Exhibit 2-6](#), [Existing General Plan Land Use Map](#), and [Exhibit 2-7](#), [Proposed General Plan Land Use Map](#), the General Plan land use designation for Areas 1 and 1A would be amended from Open Space to Mixed-Use Urban Core. As shown on [Exhibit 2-8](#), [Existing Zoning Map](#), and [Exhibit 2-9](#), [Proposed Zoning Map](#), Areas 1 and 1A would be zoned "PR" Public Recreational Zone and Sub Area B of the









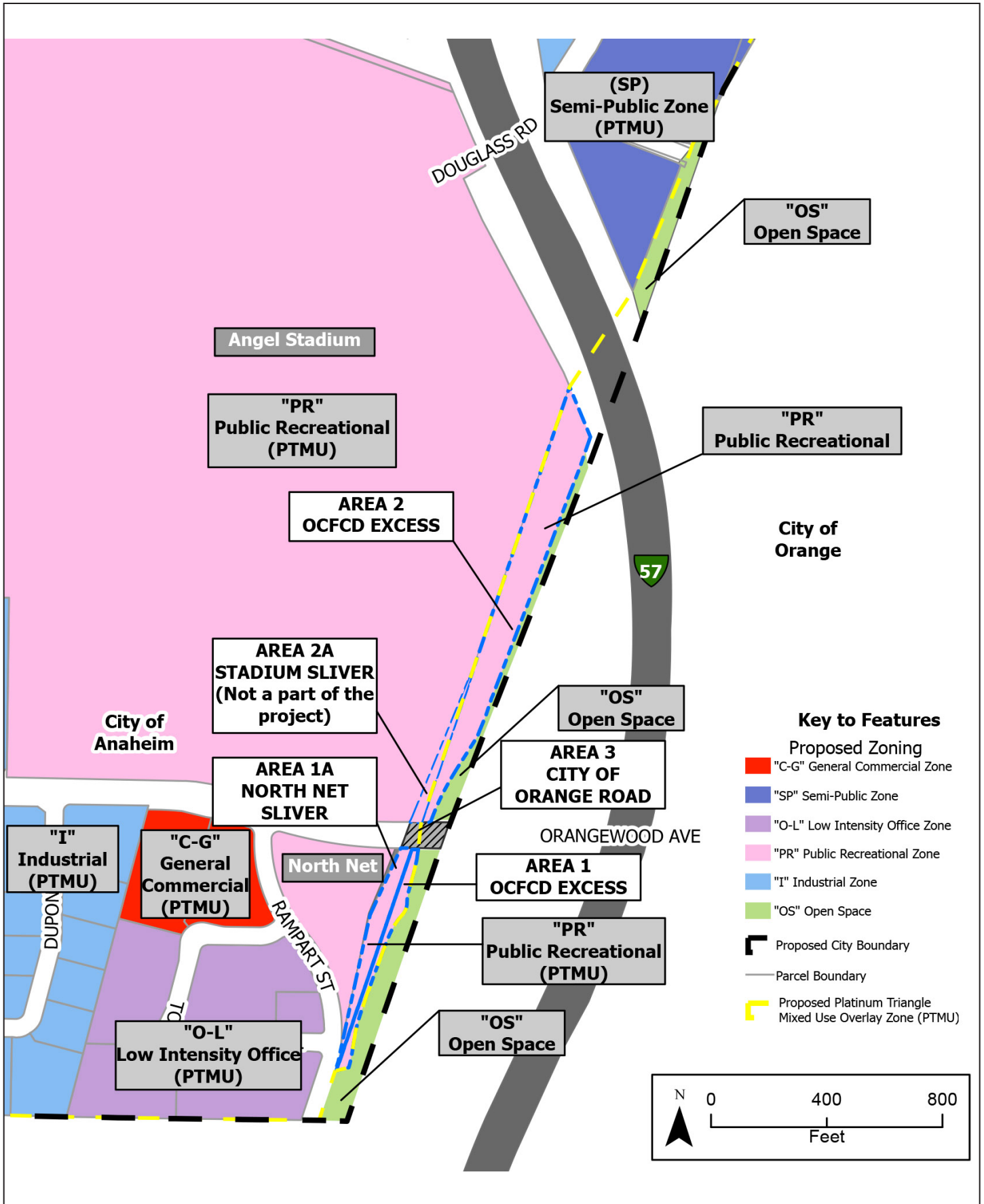




Table 2-1
Santa Ana River Reorganization

Area Subject to Reorganization	Existing General Plan Designation	Existing Zoning	Proposed General Plan Designation	Proposed Zoning
Area 1 OCFCD Excess Area 1A North Net Sliver	Open Space	None	Mixed-Use Urban Core	Public Recreational (PR) Zone Platinum Triangle Mixed-Use (PTMU) Overlay Zone Orangewood District Sub Area B
Area 2 OCFCD Excess	Open Space	None	Park	Public Recreational (PR) Zone
Area 3 City of Orange Road	Primary Arterial	Not Applicable	Primary Arterial (No Change)	Not Applicable
Remaining Area	Open Space	None	Open Space (No Change)	Open Space (OS) Zone

Orangewood District of the Platinum Triangle Mixed Use (PTMU) Overlay Zone. This is the same General Plan land use designation and zoning as the existing North Net Training Center.

The Mixed-Use Urban Core designation allows a mix of uses including residential, commercial, services, hotel, and professional office uses in a high-quality environment. The focus of this designation is on creating a pedestrian-friendly environment, including increased connectivity and community gathering spaces. Uses may mix in a vertical, horizontal, or multi-use pattern. Stand-alone uses within a multi-use project need to integrate into an overall project design and connected to other adjoining uses by plazas, promenades, and landscaped corridors; and, should include common architectural themes and signage. Typical residential uses could include stacked flats, live-work units, and artist-style lofts. The maximum density for the residential component of mixed-use development is up to 100 dwelling units per acre. The maximum floor area ratio for the nonresidential component of mixed-use development is 3.00.

The intent of the PTMU Overlay Zone is to provide opportunities for well-designed development projects that combine residential with non-residential uses. The non-residential uses include office, retail, business services, personal services, public spaces and uses, and other community amenities within the portions of the Platinum Triangle designated with the Mixed-Use, Office High and Office Low land use designations in the Anaheim General Plan, and consistent with the policy direction in the Anaheim General Plan. The PTMU Overlay Zone has the following major objectives:

- Create a unique integrated, walkable urban environment that encourages pedestrian activity and reduces dependence on the automobile for everyday needs, through a connected streetscape that is attractive, safe, and engaging;
- Develop an overall urban design framework to ensure that the appearance and effects of buildings, improvements, and uses are harmonious with the character of the area in which they are located;
- Encourage compatibility between residential, office, commercial and sports entertainment uses;
- Reinforce Transit Oriented Development (TOD) opportunities around the Anaheim Regional Transportation Intermodal Center (ARTIC) station;



- Maintain and enhance connectivity and linkages with convenience services, dining, retail, and recreation facilities within walking distance, by providing ground floor commercial uses in key locations;
- Provide a mix of housing types;
- Create great long-lasting neighborhoods that maintain value through buildings with architectural qualities that create attractive street scenes;
- Provide a variety of open space, including private, recreational-leisure areas and public parks;
- Create a balance of landscape and architecture by providing sufficient planting space; and
- Encourage parking solutions that are incentives for creative planning and sustainable neighborhood design.

The proposed reclassification to the PTMU Overlay Zone would not increase the maximum permitted development above the 321 dwelling units previously analyzed in the SEIR No. 339 for Sub Area B of the Orangewood District of the PTMU Overlay Zone. In the event the subject properties, including the existing North Net Training Center, are considered for future development, the maximum development intensity of 321 dwelling units would apply to all of Sub Area B. However, this is not anticipated in the near future at this time.

Area 2

“Area 2 OCFCD Excess” (Area 2) is located north of Orangewood Avenue and consists of a regional bike trail and landscaping. The City is currently studying the potential to purchase Area 2 from the OCFCD for the development of a park as part of a future, separate and independent project. A General Plan Amendment and Zoning Map Amendment would be required to change Area 2 land use designation from Open Space to Parks and zoning to the “PR” Public Recreational Zone; refer to [Exhibits 2-6](#) through [2-9](#). The Parks designation allows for active and passive recreational uses such as parks, trails, athletic fields, interpretive centers, and golf courses. The Parks land designation permits a maximum floor area ratio of 0.10. The PR zone implements the Parks land use designation. The intent of the PR zone is to establish for the benefit of the health, safety, and general welfare of the citizens of Anaheim and its visitors, a zone to preserve, regulate, and control the orderly use and enjoyment of City-owned properties and facilities and adjacent private property. Properties within the purview of the PR zone include: (a) City-owned properties, whether the same is exclusively occupied by the City or is used by others on the basis of some agreement with or concession by the City; and (b) adjacent private properties, whose uses and development have an impact on the use and enjoyment of City-owned properties and facilities.

Area 3 and Remaining Area

The General Plan Circulation Element would continue to designate Area 3, Orangewood Avenue, as a Primary Arterial. The General Plan Land Use Element would continue to designate the remaining area north and south of Orangewood Avenue, between the Proposed City Boundary and Areas 1, 1A, 2 and 2A, for Open Space land use. The Open Space land use designation applies to properties intended to remain in natural open space; utility easements that will provide recreational and trail access to Anaheim’s residents; heavily landscaped freeway remnant parcels, and land areas surrounding major water features. The Proposed Project would apply the OS Zone to this area. The OS Zone is the implementing Zone for the General Plan Open Space land use designation and permits a maximum floor area ratio of 0.10. Currently, the City of Anaheim Zoning Map does not include this area within any Zone.



The changes to the City jurisdictional boundaries would require amendments to the General Plan Land Use Element, Zoning Map, and Platinum Triangle Master Land Use Plan; refer to Exhibit 2-10, *Proposed Platinum Triangle Master Land Use Plan*.

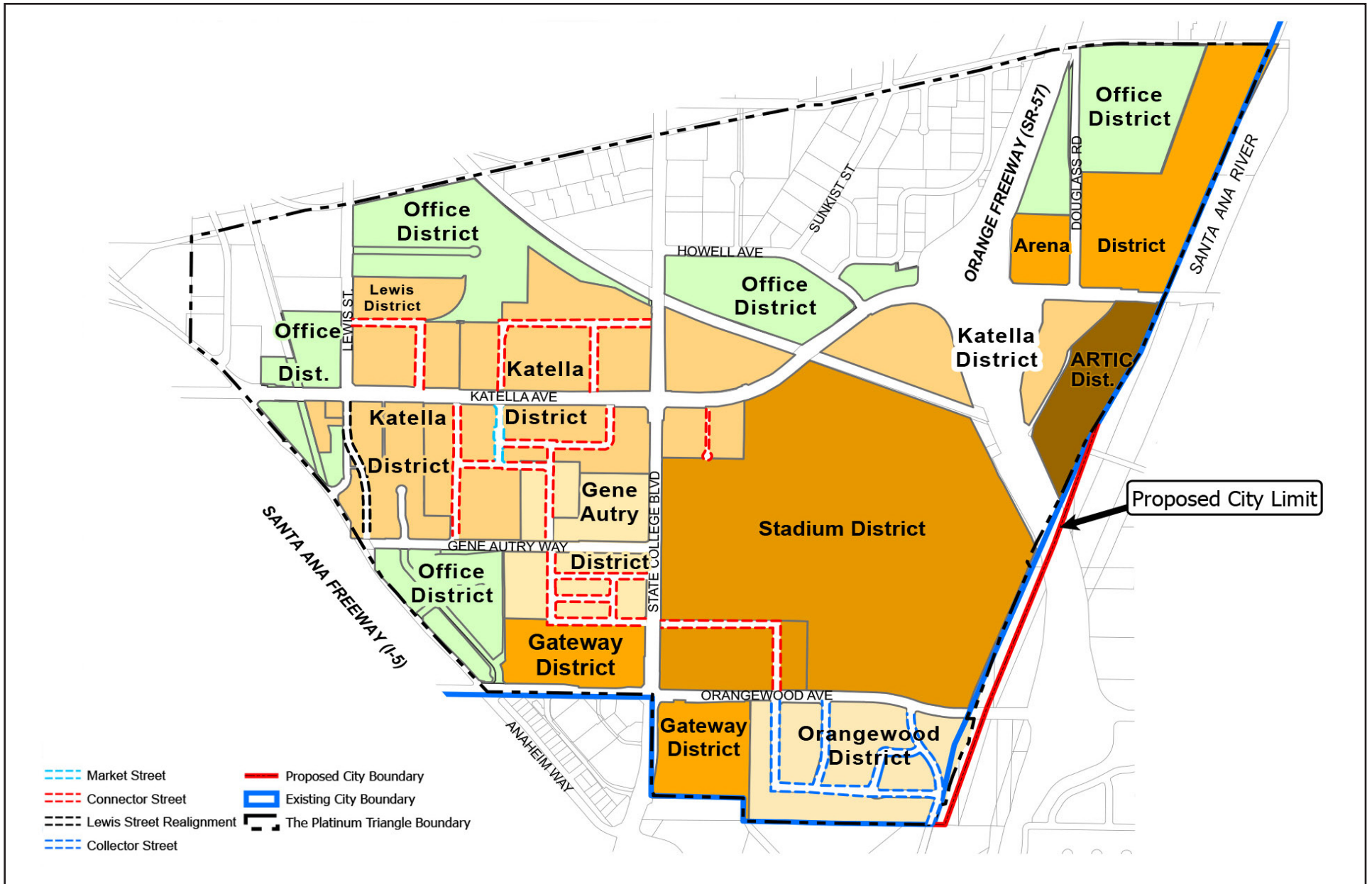
2.3.7 PROJECT APPROVALS

This Addendum to *SEIR No. 339* serves as the primary CEQA environmental document for all actions associated with the Proposed Project, including all discretionary approvals requested or required to implement the Project. The actions and/or approvals by the City of Anaheim to implement the Project include, but are not limited to, the following:

- Approval of the Addendum No. 9 to the Revised Platinum Triangle Expansion Project Subsequent Environmental Impact Report No. 339;
- Right-of-Way Construction Permit. The City is requesting issuance of a right-of-way construction permit for construction activities.
- Acquisition of Property. The City is requesting approval for acquisition of OCFCD property for construction activities and Project implementation.
- General Plan Amendment. The City is requesting to amend the City boundaries as depicted in the General Plan to annex land outside of the City limits into Anaheim and designate the annexed properties, as applicable, for their anticipated future land use.
- Zoning Map Amendment (“Reclassification”). The City is requesting to amend the City boundaries as depicted on the Zoning Map to annex land outside of the City limits into Anaheim and reclassify the annexed properties to the implementing zones for their General Plan land use designations.
- Platinum Triangle Master Land Use Plan Amendment. The City is requesting to expand the boundaries of the Platinum Triangle to incorporate land proposed for annexation into the Anaheim City limits.
- Property Tax Exchange Approval. The City is requesting approval for the exchange of property tax revenues associated with the land proposed for annexation between the City of Anaheim and City of Orange.
- City Boundary Reorganization approval/recommendation.
- District 5 Incorporation Approval.

Approvals by other agencies would include, but may not be limited to, the following:

- City of Orange Encroachment Permit;
- City of Orange Property Tax Exchange Approval;
- Caltrans Encroachment Permit;
- City of Orange Property Tax Exchange Approval;
- U.S. Army Corps of Engineers Section 404 Nationwide Permit 14 - Linear Transportation Projects and Section 408 Permit;
- California Department of Fish and Wildlife 1602 Streambed Alteration Agreement;



NOT TO SCALE

Michael Baker
INTERNATIONAL



10/21 | JN 159416

ORANGEWOOD AVENUE IMPROVEMENTS
SUBSEQUENT ENVIRONMENTAL IMPACT REPORT ADDENDUM

Proposed Platinum Triangle Master Land Use Plan

Exhibit 2-10



- Regional Water Quality Control Board Section 401 Water Quality Certification;
- City and Regional Water Quality Control Board approvals of a Stormwater Pollution Prevention Plan (SWPPP); and
- Orange County Local Agency Formation Commission (LAFCO) City Boundary Reorganization Approval.



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3.0 ENVIRONMENTAL ANALYSIS

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

On the basis of this initial evaluation:

<input type="checkbox"/>	I find that the Proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
<input type="checkbox"/>	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.
<input type="checkbox"/>	I find that the Proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
<input type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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 ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the Proposed Project, nothing further is required.

Signature

October 27, 2021

Date



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3.1 AESTHETICS

<i>Would the project:</i>	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
a. Have a substantial adverse effect on a scenic vista?				✓
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				✓
c. Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				✓
d. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?				✓

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

Previous Significance Determination: The Initial Study for SEIR No. 339 determined that the Approved Project does not contain any scenic vistas that are officially recognized at a local, State, or Federal level. The Initial Study concluded that impacts to scenic vistas would be less than significant and no mitigation measures were necessary. Because the Initial Study considered these impacts less than significant, they were not further analyzed in SEIR No. 339.

Project-Specific Analysis: Generally, scenic vistas are defined as a view of undisturbed natural lands exhibiting a unique or unusual feature that comprises an important or dominant portion of the viewshed. Scenic vistas may also be represented by a distant view that provides visual relief from less attractive views of nearby features. Other designated Federal and State lands, as well as local open space or recreational areas, may also offer scenic vistas if they represent a valued aesthetic view within the surrounding landscape of nearby features. The *Anaheim General Plan* Land Use Element designates the Santa Ana River, the Hill and Canyon Area, and open space areas as scenic resources and encourages the preservation and protection of these areas. The *Orange General Plan* Natural Resources Element designates the Santiago Hills II and Irvine Lake, grassy valleys, rugged hillsides, rock outcroppings, and winding canyons present in the east Orange portions of its planning area as scenic resources and encourages the preservation and protection of these areas while still allowing development to occur.

The Proposed Project would occur within a highly urbanized area of Anaheim and Orange where existing development blocks public views to Anaheim’s Hill and Canyon Area and open space and Orange’s scenic resources (Santiago Hills II and east Orange resources). Project construction activities associated with the trail improvements and bridge improvements at Orangewood Avenue as it crosses the Santa Ana River would involve short-term visual impacts to public views of the River (an Anaheim-designated scenic resource) due to the presence of construction equipment and heavy-duty vehicles, materials and debris piles, and other general construction activities. However, these impacts would be temporary and limited



to the Project's construction duration. Further, Project improvements would occur along a segment of the Santa Ana River where channelization has already heavily degraded significant natural features.

The proposed amendments to the General Plan, Zoning Map and PTMLUP associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development of these sites would be subject to CEQA and analyzed on a per project basis. However, given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact to aesthetics would not increase from that identified in SEIR No. 339.

Therefore, the Proposed Project would not obstruct views of the Santa Ana River over the long term. Impacts to scenic vistas would be less than significant, and the level of impact would not substantially increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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

Previous Significance Determination: The Initial Study for SEIR No. 339 determined that the Platinum Triangle is not located within the viewshed of a State scenic highway. The closest Officially Designated State Scenic Highway to the Platinum Triangle is SR-91 from SR-55 to east of the City's limit near Weir Canyon. The Initial Study concluded that impacts to scenic resources would be less than significant since the Platinum Triangle is not visible from SR-91, nor is SR-91 visible from the Platinum Triangle. Because the Initial Study considered these impacts less than significant, they were not further analyzed in SEIR No. 339.

Project-Specific Analysis: According to the California Department of Transportation's (Caltrans) California Scenic Highway Mapping System, the Project area does not contain any officially-designated scenic highways.² As indicated in the Initial Study for SEIR No. 339, the nearest eligible scenic highway is SR-91, which is located more than four miles northeast of the Project Site. The Project Site does not provide views of SR-91 due to intervening topography, structures, and vegetation. Due to the absence of designated scenic highways in the Project Site vicinity, no impact would occur, and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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

This impact threshold was modified by the Governor's Office of Planning and Research (OPR) in 2018. The changes to this threshold of significance consist of refinements and clarifications of existing requirements. Specifically, consideration of degradation of character or quality was clarified for urbanized areas.

² California Department of Transportation Website, *California Scenic Highway Mapping System*, http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm, Accessed October 11, 2017.



Although the specific language for this threshold of significance has changed, the analysis was considered in the SEIR No. 339 on page 5.1-9 of SEIR No. 339.

Previous Significance Determination: SEIR No. 339 classifies the Platinum Triangle as an area transitioning from light industrial to mixed use development in accordance with the adopted *PTMLUP*. Despite the increased intensity of residential and nonresidential land uses, SEIR No. 339 found that compliance with provisions of the adopted *PTMLUP* would ensure the individual projects are compatible with existing and future land uses within the Platinum Triangle. SEIR No. 339 concluded that impacts to visual character and quality would be less than significant with the incorporation of SEIR No. 332 Mitigation Measure (MM) 5.1-1, which requires a shade analysis for shadow-sensitive properties.

Project-Specific Analysis: As discussed in Section 2.0, the Project Site consists of paved asphalt roadway right-of-way and a regional bike trail, surrounded by channelized portions of the Santa Ana River, SR-57, commercial, office, institutional, and residential land uses. Based on the Project's location within an urban environment, the Proposed Project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. The following discussion analyzes the Proposed Project's potential to conflict with applicable zoning and other regulations governing scenic quality.

No applicable municipal or other regulations governing scenic quality apply to the Project Site; refer to Section 3.11, *Land Use and Planning*. The *Anaheim General Plan* does not identify Orangewood Avenue as a Scenic Expressway and the *Orange General Plan* does not identify it as a Viewscape Corridor. Limited permanent visual changes associated with the proposed roadway widening and associated infrastructure and Santa Ana River reorganization would occur because of the Proposed Project. As such, once construction is complete, the roadway widening and realignment of jurisdictional boundaries of land along the Santa Ana River would not significantly impact the visual character of the Project Site. In addition, the Proposed Project would not involve aboveground features which are substantially different from existing conditions. Visible changes associated with the Proposed Project would include additional hardscapes associated with the widened Orangewood Avenue bridge structure. The Proposed Project would lengthen five existing bents situated along the Santa Ana River bottom to accommodate the widening. In addition, the Project would realign a portion of the Santa Ana River Trail along the western portion of the Santa Ana River, and reconstruct in-place at the eastern portion. The Proposed Project would install new trail walls under the widened Orangewood Avenue bridge structure. The proposed amendments to the General Plan, Zoning Map and *PTMLUP* associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development of these sites would be subject to CEQA and analyzed on a per project basis. However, given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact to groundwater supplies would not increase from that identified in SEIR No. 339.

Overall, these features would occur within a heavily disturbed segment of the River that has been subject to channelization and is generally devoid of natural resources; refer to Section 3.4, *Biological Resources*. Based on the similarity of these features to existing conditions, permanent visual changes associated with the Proposed Project would not significantly impact the visual character of the Project Site. The Project also would not result in shade and shadow impacts to adjacent properties and SEIR No. 332 MM 5.1-1 is not applicable. Less than significant impacts would occur in this regard, and the level of impact would not substantially increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.



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

Previous Significance Determination: According to the Initial Study for SEIR No. 339, buildout of the *PTMLUP* would introduce numerous new sources of nighttime illumination, including those related to buildings, pedestrian walkways, parking areas, park facilities, and roadways. The Initial Study for SEIR No. 339 concluded that compliance with the provisions of the *PTMLUP* and SEIR No. 332 MM 5.1-1 would reduce light and glare impacts to less than significant with mitigation.

Project-Specific Analysis: To accommodate widening at the Orangewood Avenue Santa Ana River crossing, the Proposed Project would realign/reconstruct portions of the Santa Ana River Trail located within OCFCD/City of Orange jurisdiction. The Proposed Project would relocate existing street lights occurring at the westerly Orangewood Avenue/SR-57 signalized intersection to accommodate the new travel lane. The Proposed Project's light sources would be installed to safeguard public safety of motorists, pedestrians, and bicyclists traveling along the affected segment of Orangewood Avenue and trail users. Lighting would be similar to existing lighting sources on-site and along Orangewood Avenue and designed to avoid light-spillage onto surrounding uses. SEIR No. 332 MM 5.1-1 requires preparation of a shade/shadow analysis for future development projects where adjacent uses are shadow sensitive. As a roadway widening and annexation project, SEIR No. 332 MM 5.1-1 would not be applicable. The proposed amendments to the General Plan, Zoning Map and *PTMLUP* associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development of these sites would be subject to CEQA and analyzed on a per project basis. However, given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact to aesthetics would not increase from that identified in SEIR No. 339. For these reasons, impacts concerning light or glare would be less than significant, and the level of impact associated with the Proposed Project would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

3.1.1 MITIGATION PROGRAM

Mitigation Measures from SEIR No. 332

SEIR No. 332 mitigation measures are not applicable to the Proposed Project.

Mitigation Measures from SEIR No. 339

SEIR No. 339 mitigation measures are not applicable to the Proposed Project.



3.2 AGRICULTURE AND FORESTRY RESOURCES

<i>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</i>	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				✓
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?				✓
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				✓
d. Result in the loss of forest land or conversion of forest land to non-forest use?				✓
e. Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				✓

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

Previous Significance Determination: The Initial Study for SEIR No. 339 determined that the Platinum Triangle and its surrounding vicinity are not located within an area designated as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance. Because there were no impacts, these resources were not further analyzed in SEIR No. 339.

Project-Specific Analysis: According to the California Department of Conservation’s Farmland Mapping and Monitoring Program (FMMP), the Project Site is not located within an area designated Prime Farmland, Farmland of Statewide Importance, or Farmland of Local Importance. The affected segment of Orangewood Avenue and the Santa Ana River reorganization area and all adjoining uses are designated



“Urban and Built-Up Land.”³ No impact would occur, and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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

Previous Significance Determination: The Initial Study for SEIR No. 339 determined that the Platinum Triangle and its surrounding vicinity do not include areas zoned for agricultural use or active Williamson Act contracts. Because there were no impacts, these resources were not further analyzed in SEIR No. 339.

Project-Specific Analysis: Refer to Impact 3.2 (a) above. Neither the Project Site, nor its adjoining uses are zoned for agricultural use or are under a Williamson Act contract.⁴ Project implementation would not conflict with existing zoning for agricultural use or a Williamson Act contract, and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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

Previous Significance Determination: Since the Anaheim City Council certified SEIR No. 339, OPR has revised the *CEQA Guidelines* Appendix G to include new forestry resources thresholds. Accordingly, this Addendum has conducted the review presented below.

Project-Specific Analysis: Neither the Project Site, nor its adjoining uses are zoned as forest land (as defined in PRC section 12220(g)), timberland (as defined in PRC Section 4526), or timberland zoned Timberland Production (as defined by Government Code section 4526) by the *Anaheim* or *Orange Zoning Codes*. No impacts associated with forest land, timberland, or timberland zoned as Timberland Production would occur, and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No increase in significant impacts has resulted.

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

Previous Significance Determination: Since the Anaheim City Council certified SEIR No. 339, OPR has revised the *CEQA Guidelines* Appendix G to include new forestry resources thresholds. Accordingly, this Addendum has conducted the review presented below.

³ California Department of Conservation, Farmland Mapping and Monitoring Program, *Orange County Important Farmland 2012*, January 2015.

⁴ California Department of Conservation, *Agricultural Preserves 2004 (Williamson Act Parcels Orange County, California)*, 2004.



Project-Specific Analysis: Refer to Response 3.2 (c) above. Project implementation would not result in the loss of forest land or conversion of forest land to non-forest use, and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No increase in significant impacts has resulted.

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

Previous Significance Determination: The Initial Study for SEIR No. 339 determined that the Platinum Triangle and its surrounding vicinity do not support agricultural lands. Because there were no impacts, this topic was not further analyzed in SEIR No. 339. Since the Anaheim City Council certified SEIR No. 339, OPR has revised the *CEQA Guidelines* Appendix G to include new forestry resources thresholds. Accordingly, this Addendum has conducted the review presented below.

Project-Specific Analysis: Refer to Responses 3.2 (a) and 3.2 (b) above. Project implementation would not involve changes in the existing environment which would result in conversion of Farmland to non-agricultural use or forestland to non-forest use, and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No increase in significant impacts has resulted.

3.2.1 MITIGATION PROGRAM

Since the Anaheim City Council certified SEIR No. 332 and SEIR No. 339, the State of California has revised the *CEQA Guidelines* Appendix G to address forest and timberland resources. Although SEIR No. 332 and SEIR No. 339 did not evaluate these resources, no such resources are present within the Platinum Triangle and its surrounding vicinity. No impacts would occur and no mitigation is required.

Mitigation Measures from SEIR No. 332

SEIR No. 332 does not include mitigation measures for agricultural and forestry resources.

Mitigation Measures from SEIR No. 339

SEIR No. 339 does not include mitigation measures for agricultural and forestry resources.



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3.3 AIR QUALITY

<i>Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:</i>	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
a. Conflict with or obstruct implementation of the applicable air quality plan?				✓
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?				✓
c. Expose sensitive receptors to substantial pollutant concentrations?				✓
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?				✓

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Previous Significance Determination: SEIR No. 339 concluded that although *PTMLUP* buildout could result in an increase in vehicle miles traveled (VMT) and trips in the local area, the *PTMLUP* would benefit to the Southern California Association Government (SCAG) region as it would allow for housing opportunities closer to employment centers. SEIR No. 339 determined that the *PTMLUP* would therefore be consistent with SCAG’s strategies to reduce VMT in the SCAG region and would be consistent with Southern California Air Quality Management District’s *2007 Air Quality Management Plan (2007 AQMP)*, which was the applicable air quality plan at the time. Impacts concerning conflicting with or obstructing implementation of the SCAQMD’s 2007 AQMP were identified as less than significant, and no mitigation was identified.

Project-Specific Analysis: The Proposed Project site is located in the South Coast Air Basin (Basin), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). Pursuant to the Federal Clean Air Act (CAA), the SCAQMD is required to reduce emissions of criteria pollutants for which the Basin is in nonattainment: ozone (O₃), coarse particulate matter (PM₁₀), and fine particulate matter (PM_{2.5}). These are considered criteria pollutants because they are three of several prevalent air pollutants known to be hazardous to human health.

Since certification of SEIR No. 339, the SCAQMD has adopted the *2016 Air Quality Management Plan (2016 AQMP)* to reduce emissions of criteria pollutants for which the Basin is in nonattainment. The 2016 AQMP is a regional and multi-agency effort including the SCAQMD, the California Air Resources Board (CARB), SCAG, and the United States Environmental Protection Agency (EPA) to establish a program of rules and regulations directed at reducing air pollutant emissions and achieving State (California) and Federal air quality standards. The 2016 AQMP pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including SCAG’s *2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)*, updated emission inventory methodologies for various



source categories, and SCAG's latest growth forecasts.⁵ SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans. The Project is subject to the SCAQMD's 2016 AQMP.

The Criteria for determining consistency with the AQMP is defined by the following indicators:

- Consistency Criterion No. 1: The Proposed Project would not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.
- Consistency Criterion No. 2: The Proposed Project would not exceed the assumptions in the AQMP based on the years of project buildout phase.

Concerning Consistency Criterion No. 1, the Proposed Project would not involve a change of land use which would increase the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the 2016 AQMP. The violations to which Consistency Criterion No. 1 refers are the California ambient air quality standards (CAAQS) and the national ambient air quality standards (NAAQS). The Proposed Project involves the additional widening of the bridge structure over the Santa Ana River, new property acquisition in OCFCD right-of-way, Santa Ana River Trail realignment, drainage facility relocation in the Santa Ana River, a water line extension, and reorganization of municipal jurisdiction of land along the Santa Ana River. Based on the scope and scale of these improvements, Project implementation would not exceed the short-term construction or long-term operational air quality standards beyond what SEIR No. 339 evaluated for the Approved Project. Thus, the Proposed Project would be consistent with Consistency Criterion No. 1, and the level of impact would not increase from that identified in SEIR No. 339.

Concerning Consistency Criterion No. 2, the 2016 AQMP contains air pollutant reduction strategies and demonstrates that the applicable ambient air quality standards can be achieved within the periods required under Federal law. Growth projections from local general plans adopted by cities in the district are provided to SCAG, which develops regional growth forecasts that are used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections in the *Anaheim* and *Orange General Plans* is considered consistent with the AQMP.

As discussed, Project implementation would accommodate existing and predicted traffic patterns along Orangewood Avenue. The Proposed Project's design accommodates additional traffic volumes; proposed improvements would not directly generate new traffic or increase the number of vehicles along the roadway.

The proposed amendments to the General Plan, Zoning Map and PTMLUP associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. The proposed amendments reflect anticipated future development of these areas, which is similar in intensity to what the General Plan already permits. Currently the General Plan designates the subject properties for Mixed Use Urban Core and Open Space land use. The proposed

⁵ SCAQMD is currently working on the next iteration of the AQMP, the *2022 Air Quality Management Plan (2022 AQMP)*. The 2022 AQMP will incorporate the recently adopted SCAG's *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS)*. However, until the adoption of the 2022 AQMP, project AQMP consistency will be analyzed off the 2016 AQMP and the RTP/SCS that was adopted at the time, the 2016-2040 RTP/SCS.



amendments for Area 1 and 1A would spread the intensities permitted General Plan Mixed-Use Urban Core land use designation over a slightly larger area; however, the amendments would not increase the maximum intensities permitted by the General Plan for the Platinum Triangle. The proposed amendments for Area 2 would change the land use designation for Open Space to Parks; the General Plan permits both uses at the same maximum FAR of 0.10. Any future park project would be subject to CEQA. There would be no change in the General Plan designations for the remainder of the area subject to the reorganization. Given that the permitted type and intensity of development would be similar to what was previously analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339.

As a roadway improvement and annexation project, Project implementation would not conflict with the population and employment growth assumptions identified in the 2016 AQMP. For these reasons, the Project would be consistent with Consistency Criterion No. 2, and Project implementation would not conflict with or obstruct implementation of the 2016 AQMP.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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

This impact threshold was modified by the OPR in 2018. The changes to this threshold of significance consist of refinements and clarifications of existing requirements. Although the specific language for this threshold of significance has changed, the analysis was considered in the SEIR No. 339 pages 5.2-17 to 5.2-19.

Previous Significance Determination: SEIR No. 339 concluded that *PTMLUP* implementation had the potential to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under applicable Federal or State ambient air quality standards. Despite incorporation of SEIR No. 339 MM 2-1 through MM 2-6, SEIR No. 339 found that construction and operation would generate short-term and long-term air pollutants that would exceed SCAQMD's regional significance thresholds. A significant and unavoidable impact was identified, and a Statement of Overriding Considerations was adopted by the City Council at SEIR No. 339 certification.

Project-Specific Analysis:

Short-Term Construction

Dust (PM₁₀) is typically a major concern during rough grading activities. Because such emissions are not amenable to collection and discharge through a controlled source, they are called "fugitive emissions." Fugitive dust emission rates vary as a function of many parameters (e.g., soil silt, soil moisture, wind speed, area disturbed, number of vehicles, depth of disturbance or excavation). All development projects in the Cities of Anaheim and Orange, including the Proposed Project, are subject to SCAQMD rules and regulations to reduce fugitive dust emissions.

Project construction would be subject to compliance with the *City of Orange Grading Ordinance* (*Orange Municipal Code* Chapter 16.40, Grading Requirements), which incorporates by reference the City of Orange Manual of Grading. The *City of Orange Grading Ordinance* establishes minimum requirements to regulate excavation, grading, and earthwork construction, which act to reduce impacts concerning fugitive



dust. In addition to City requirements, all grading operations, land clearing, loading, stockpiling, landscaping, vehicular track-out, and haul routes would be subject to compliance with SCAQMD Rule 403, which is included in SEIR No. 339 as MM 2-2. SCAQMD Rule 403 (Fugitive Dust) requires fugitive dust sources to implement best available control measures for all sources, and all forms of visible particulate matter are prohibited from crossing any property line. SCAQMD adopted Rule 403 to reduce PM emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. MM 2-2 of SEIR No. 339 includes these PM suppression techniques.

In addition to the *City of Orange Grading Ordinance* and SEIR No. 339 MM 2-2 (SCAQMD Rule 403), Project construction would be subject to SCAQMD Rule 1113 (Architectural Coatings); Rule 431.2 (Low Sulfur Fuel); and Rule 1186/1186.1 (Street Sweepers), among others. Project construction would also demonstrate conformance with SEIR No. 339 MM 2-1 and 2-3 to reduce construction-related emissions. Based on the scope and scale of the Project's proposed improvements, Project implementation would not exceed the short-term construction air quality standards beyond what SEIR No. 339 concluded, following compliance with the *City of Orange Grading Ordinance* and relevant SCAQMD Rules. Thus, the Project's construction-generated criteria pollutant emissions would not exceed their respective thresholds and the level of impact would not increase from that identified in SEIR No. 339.

Long-Term Operations

The Project does not include components which would generate permanent stationary (i.e., new buildings) or new mobile sources of emissions. Therefore, by its nature, the Project would not generate quantifiable criteria emissions from long-term operations. The proposed roadway widening would accommodate existing and predicted traffic demands in compliance with SEIR No. 339 MM 2-5 and would not directly generate new traffic or increase the numbers of vehicles along the roadway. The Project's pedestrian sidewalks and bicycle lanes would improve non-motorized transportation options. As discussed in [Section 3.16, *Transportation and Traffic*](#), Project implementation would not impact existing traffic conditions along Orangewood Avenue.

The proposed amendments to the General Plan, Zoning Map and PTMLUP associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. The proposed amendments would result in land use that is similar in intensity to what the General Plan currently permits. Currently the General Plan designates the subject properties for Mixed-Use Urban Core and Open Space land use. The proposed amendments for Area 1 and 1A would spread the intensities permitted General Plan Mixed-Use Urban Core land use designation over a slightly larger area; however, the amendments would not increase the maximum intensities permitted by the General Plan for the Platinum Triangle. The proposed amendments for Area 2 would change the land use designation for Open Space to Parks; the General Plan permits both uses at the same maximum FAR of 0.10. There would be no change in the General Plan designations for the remainder of the area subject to the reorganization. Any future development of any of these sites would be subject to CEQA and analyzed on a per project basis for short-term construction and long-term operational air quality impacts. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339.

Thus, the Project would not result in permanent stationary or mobile sources of emissions and the level of impact would not increase from that identified in SEIR No. 339.



Cumulative Impacts

Cumulatively considerable projects could contribute to an existing or projected air quality exceedance since the SCAB is currently in nonattainment for O₃ and PM_{2.5}. The improvements identified in Section 2.0 are not expected to substantially increase the *PTMLUP*'s short-term and long-term air pollutants identified in SEIR No. 339. All cumulative development occurring within the Basin would be subject to compliance with applicable SCAQMD rules and regulations. As the Project would not involve substantial changes which would contribute a cumulatively considerable net increase in the region for any non-attainment criteria pollutant beyond that identified in SEIR No. 339, the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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

Previous Significance Determination: Sensitive populations (sensitive receptors) are more susceptible to air pollution effects than the general population. Sensitive populations that are in proximity to localized sources of toxics and CO are of particular concern. Some land uses are considered more sensitive to air quality changes than others, depending on the population groups and the activities involved. CARB identifies the following types of people as most likely to be adversely affected by air pollution: children under 14; elderly over 65; athletes; and, people with cardiovascular and chronic respiratory diseases. Locations with potential to contain a high concentration of these sensitive population groups are called sensitive receptors and include residential areas, hospitals, day-care facilities, elder-care facilities, places of worship, elementary schools, and parks.

SEIR No. 339 concluded that *PTMLUP* implementation could expose sensitive receptors to substantial pollutant concentrations. Despite implementation of MM 2-1 through 2-9, SEIR No. 339 found that: (1) construction activities would potentially expose sensitive receptors to substantial pollutant concentrations of NO_x, CO, PM₁₀, and PM_{2.5}; and (2) sensitive land uses within 500 feet of SR-57 and I-5, or within the recommended buffer distances to facilities emitting TACs, may be exposed to substantial pollutant concentrations. Impacts were determined to remain significant and unavoidable, and a Statement of Overriding considerations was adopted by the City Council when SEIR No. 339 was certified.

Project-Specific Analysis: Sensitive receptors within 500 feet of the Project area include a surgical center (Orangewood Surgical Center) and residential uses to the north and south of the Project Site, respectfully.

The Proposed Project involves the additional widening of the bridge structure over the Santa Ana River, new property acquisition in OCFCD right-of-way, Santa Ana River Trail realignment, drainage facility relocation in the Santa Ana River, a water line extension, and annexation of land along the Santa Ana River. Construction activities would involve incidental amounts of toxic substances such as oils, solvents, paints, adhesives, and coatings. The use and application of these substances would comply with all applicable SCAQMD rules for their use, storage, and disposal. The SCAQMD has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the Federal and/or State ambient air quality standards (NAAQS/CAAQS). Collectively, these are referred to as localized significance thresholds (LSTs). Based on the scope and scale of these improvements, it is not anticipated that Project construction would involve LST construction impacts greater than those identified in SEIR No. 339. In accordance with SEIR No. 339 MM 2-2, Project construction would also demonstrate compliance with SCAQMD Rule 403 to reduce impacts to nearby sensitive receptors. In addition, the



Project would demonstrate compliance with SEIR No. 339 MM 2-1 and MM 2-3 to reduce onsite and export-related construction emissions. Compliance with SEIR No. 339 MM 2-1 through 2-3 would reduce LST construction impacts to a less than significant level.

The proposed amendments to the General Plan, Zoning Map and PTMLUP associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. The proposed amendments would result in land use that is similar in intensity to what the General Plan currently permits. Currently the General Plan designates the subject properties for Mixed-Use Urban Core and Open Space land use. The proposed amendments for Area 1 and 1A would spread the intensities permitted General Plan Mixed-Use Urban Core land use designation over a slightly larger area; however, the amendments would not increase the maximum intensities permitted by the General Plan for the Platinum Triangle. The proposed amendments for Area 2 would change the land use designation for Open Space to Parks; the General Plan permits both uses at the same maximum FAR of 0.10. There would be no change in the General Plan designations for the remainder of the area subject to the reorganization. Any future development of any of these sites would be subject to CEQA. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339.

Therefore, sensitive receptors would not be subject to a significant air quality impact during construction and level of impact would not increase from that identified in SEIR No. 339.

Carbon Monoxide Hotspots

CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. Under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels (i.e., adversely affecting residents, schoolchildren, hospital patients, the elderly, etc.). The SCAQMD requires a quantified assessment of CO hotspots when a Project increases the volume-to-capacity ratio (also called the intersection capacity utilization [ICU]) by 0.02 (two percent) for any intersection with an existing level of service LOS D or worse. Because traffic congestion is highest at intersections, where vehicles queue and are subject to reduced speeds, these hot spots are typically produced at intersections.

The Project involves widening Orangewood Avenue and related improvements and would not generate new vehicle trips beyond those identified in SEIR No. 339; refer to [Section 3.17](#). In compliance with SEIR No. 339 MM 2-5, Project implementation would reduce congestion and improve traffic flow along Orangewood Avenue. The proposed amendments to the General Plan, Zoning Map and PTMLUP associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. The proposed amendments would result in land use that is similar in intensity to what the General Plan currently permits. Currently the General Plan designates the subject properties for Mixed-Use Urban Core and Open Space land use. The proposed amendments for Area 1 and 1A would spread the intensities permitted General Plan Mixed-Use Urban Core land use designation over a slightly larger area; however, the amendments would not increase the maximum intensities permitted by the General Plan for the Platinum Triangle. The proposed amendments for Area 2 would change the land use designation for Open Space to Parks; the General Plan permits both uses at the same maximum FAR of 0.10. There would be no change in the General Plan designations for the remainder of the area subject to the reorganization. Any future development of any of these sites would be subject to CEQA and analyzed on a per project basis for short-term construction and long-term operational air quality impacts. Given that the permitted type and intensity of development would be similar to what was



previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339. Thus, the Proposed Project would not increase the ICU or nearby intersections to warrant a CO hotspot analysis. Impacts would be less than significant and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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

This impact threshold was modified by the OPR in 2018. The changes to this threshold of significance consist of refinements and clarifications of existing requirements. Although the specific language for this threshold of significance has changed, the analysis was considered in the SEIR No. 339 on page 5.2-27.

Previous Significance Determination: SEIR No. 339 concluded that *PTMLUP* buildout would involve less than significant impacts concerning objectionable odors with the incorporation of SEIR No. 339 MM 2-10. MM 2-10 applies to projects located within 1,000 feet of an industrial facility that emits substantial odors (e.g., wastewater treatment plants, food processing facilities, coffee roasters).

Project-Specific Analysis: Land uses generally associated with odor complaints include agricultural uses (livestock and farming), wastewater treatment plants, food processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities. The Project involves roadway improvements and does not contain land uses typically associated with emitting objectionable odors. Potential odor sources associated with Project implementation may result from construction equipment exhaust and the application of asphalt during construction activities. However, standard construction requirements would minimize odor impacts from construction. Construction odor emissions would be intermittent in nature over a temporary period, would disperse rapidly, would not affect a substantial number of people, and would cease upon completion of the respective phase of construction. Additionally, construction activities would be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. As a roadway infrastructure and annexation project, Project implementation would not create objectionable odors and MM 2-10 is not required.

The proposed amendments to the General Plan, Zoning Map and *PTMLUP* associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. The proposed amendments would result in land use that is similar in intensity to what the General Plan currently permits. Currently the General Plan designates the subject properties for Mixed-Use Urban Core and Open Space land use. The proposed amendments for Area 1 and 1A would spread the intensities permitted General Plan Mixed-Use Urban Core land use designation over a slightly larger area; however, the amendments would not increase the maximum intensities permitted by the General Plan for the Platinum Triangle. The proposed amendments for Area 2 would change the land use designation for Open Space to Parks; the General Plan permits both uses at the same maximum FAR of 0.10. There would be no change in the General Plan designations for the remainder of the area subject to the reorganization. Any future development of any of these sites would be subject to CEQA and analyzed on a per project basis. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339.



For the above reasons, the Project's potential construction-related and operational odor impacts are considered less than significant, and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

3.3.1 MITIGATION PROGRAM

Mitigation Measures from SEIR No. 332

Refer to the Mitigation Measures from SEIR No. 339 below, which are based on adopted Mitigation Measures from SEIR No. 332.

Mitigation Measures from SEIR No. 339

SEIR No. 339 includes measures to reduce potential impacts associated development and infrastructure improvements within the Platinum Triangle. The following measures from SEIR No. 339 are applicable to the Proposed Project.⁶ Any modifications to the original measures are shown in ~~striketrough~~ for deleted text and new, inserted text is underlined.

MM 2-1 Ongoing during grading and construction, the ~~property owner/developer~~ City shall be responsible for requiring contractors to implement the following measures to reduce construction-related emissions; however, the resultant value is expected to remain significant.

- a. The contractor shall ensure that all construction equipment is being properly serviced and maintained in accordance with the manufacturer's recommendations to reduce operational emissions.
- b. The contractor shall use Tier 3 or higher, as identified by the United States Environmental Protection Agency, off-road construction equipment with higher air pollutant emissions standards for equipment greater than 50 horsepower, based on manufacturer's availability.
- c. The contractor shall utilize existing power sources (e.g., power poles) or clean-fuel generators rather than temporary diesel-power generators, where feasible.

MM 2-2 Ongoing during grading and construction, the ~~property owner/developer~~ City shall implement the following measures in addition to the existing requirements for fugitive dust control under South Coast Air Quality Management District Rule 403 to further reduce PM₁₀ and PM_{2.5} emissions. To assure compliance, the City shall verify compliance that these measures have been implemented during normal construction site inspections. The measures to be implemented are listed below:

- a. During all grading activities, the ~~property owner/developer~~ City's construction contractor shall re-establish ground cover on the construction site through seeding

⁶ Mitigation measure numbering corresponds to Platinum Triangle Master Land Use Plan Appendix C, Updated and Modified Mitigation Monitoring Program Number 106C.



and watering as quickly as possible to achieve a minimum control efficiency for PM₁₀ of 5 percent.

- b. During all grading activities, the ~~property owner/developer~~ City's construction contractor shall apply chemical soil stabilizers to on-site haul roads to achieve a control efficiency for PM₁₀ of 85 percent compared to travel on unpaved, untreated roads.
- c. The ~~property owner/developer~~ City's construction contractor shall phase grading to prevent the susceptibility of large areas to erosion over extended periods of time.
- d. The ~~property owner/developer~~ City's construction contractor shall schedule activities to minimize the amount of exposed excavated soil during and after the end of work periods.
- e. During all construction activities, the ~~property owner/developer~~ City's construction contractor shall sweep streets with Rule 1186-compliant PM₁₀-efficient vacuum units on a daily basis if silt is carried over to adjacent public thoroughfares or occurs as a result of hauling.
- f. During active demolition and debris removal and grading, the ~~property owner/developer~~ City's construction contractor shall suspend demolition and grading operations when wind speeds exceed 25 miles per hour to achieve an emissions control efficiency for PM₁₀ under worst-case wind conditions of 98 percent.
- g. During all construction activities, the ~~property owner/developer~~ City's construction contractor shall maintain a minimum 12-inch freeboard ratio on haul trucks hauling dirt, sand, soil, or other loose materials and tarp materials with a fabric cover or other suitable means to achieve a control efficiency for PM₁₀ of 91 percent.
- h. During all construction activities, the ~~property owner/developer~~ City's construction contractor shall water exposed ground surfaces and disturbed areas a minimum of every three hours on the construction site to achieve an emissions reduction control efficiency for PM₁₀ of 61 percent.
- i. During active demolition and debris removal, the ~~property owner/developer~~ City's construction contractor shall apply water to disturbed soils at the end of each day to achieve an emission control efficiency for PM₁₀ of 10 percent.
- j. During scraper unloading and loading, the ~~property owner/developer~~ City's construction contractor shall ensure that actively disturbed areas maintain a minimum soil moisture content of 12 percent by use of a moveable sprinkler system or water truck to achieve a control efficiency for PM₁₀ of 69 percent.
- k. During all construction activities, the ~~property owner/developer~~ City's construction contractor shall limit on-site vehicle speeds on unpaved roads to no more than 15 miles per hour to achieve a control efficiency for PM₁₀ of 57 percent.



MM 2-3 Prior to approval of each grading plan (for Import/Export Plan) and ~~prior to issuance of demolition permits (for Demolition Plans)~~, the ~~property owner/developer~~ City shall submit Demolition and Import/Export Plans detailing construction and demolition (C&D) recycling and waste reduction measures to be implemented to recover C&D materials. These plans shall include identification of off-site locations for materials export from the project and options for disposal of excess material. These options may include recycling of materials on-site or to an adjacent site, sale to a soil broker or contractor, sale to a project in the vicinity or transport to an environmentally cleared landfill, with attempts made to move it within Orange County. The ~~property owner/developer~~ City shall offer recyclable building materials, such as asphalt or concrete for sale or removal by private firms or public agencies for use in construction of other projects if not all can be reused at the ~~project site~~ Project Site.

MM 2-5 In accordance with the timing required by the Traffic and Transportation Manager during the Plans, Specifications, and Estimate phase, but no later than prior to the first final Building and Zoning inspection, the ~~City property owner/developer~~ City shall implement the following measures to reduce long-term operational CO, NO_x, ROG, and PM₁₀ emissions: (5.2-5)

- Traffic lane improvements and signalization as outlined in the Revised Platinum Triangle Expansion Project Traffic Study Report by Parsons Brinkerhoff, August 2010, and Master Plan of Arterial Highways (MPAH) shall be implemented as required by the Traffic and Transportation Manager.
- The ~~property owner/developer~~ City shall place bus benches and/or shelters as required by the Traffic and Transportation Manager at locations along any site frontage routes as needed.



3.4 BIOLOGICAL RESOURCES

<i>Would the project:</i>	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				✓
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				✓
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				✓
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				✓
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				✓
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				✓

This section is primarily based on the *Results of a Biological Resources Assessment for the Orangewood Avenue Bridge Widening Over Santa Ana River in the City of Orange, California* (Biological Resources Assessment) and *Jurisdictional Delineation for the Orangewood Avenue Bridge Widening Over Santa Ana River in the City of Orange, California* (Jurisdictional Delineation) prepared by Michael Baker International, dated September 28, 2017 and January 22, 2018, respectively; refer to Appendix A, Biological Resources Assessment, and Appendix B, Jurisdictional Delineation.

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

Previous Significance Determination: The Initial Study for SEIR No. 339 concluded that no native biological resources exist within the Platinum Triangle due to the site’s developed and disturbed nature. The Initial Study found that buildout of the *PTMLUP* would not impact candidate, sensitive, or special-status species and no mitigation was necessary. Because there were no impacts, these resources were not further analyzed in SEIR No. 339.



Project-Specific Analysis: A Biological Resources Assessment was prepared for the Proposed Project and included a habitat assessment to survey existing biological conditions on and surrounding the Project Site. In addition to the habitat assessment, the California Natural Diversity Database (CNDDDB) was queried for reported locations of listed and special-status plant and wildlife species as well as special-status vegetation communities near the Project Site; refer to [Appendix A](#). A search of published records of these species was conducted within this quadrangle using the CNDDDB Rarefind5 online software. The California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants supplied information regarding the distribution and habitats of plants in the Project vicinity. The habitat assessment evaluated the ability of the plant communities found on-site to provide suitable habitat for relevant special-status plant and wildlife species.

Special-Status Plant Species. No special-status plant species were observed on-site during the habitat assessment. Based on the records search, a total of four special-status plant species have been recorded within the vicinity of the Project by the CNDDDB and CNPS Online Inventory. However, most of these species have a low potential or are not expected to occur on-site due to a lack of suitable habitat to support them. No impact would occur in this regard.

Special-Status Wildlife Species. No special-status wildlife species were observed on-site during the habitat assessment. Based on the records search, a total of 18 special-status wildlife species have been recorded within the vicinity of the Project by the CNDDDB. However, most of these species have a low potential or are not expected to occur on-site due to a lack of suitable habitat to support them. No impact would occur in this regard.

Special-Status Plant Communities. No special-status plant communities were observed on-site during the habitat assessment. Based on the results of the habitat assessment, no special-status plant communities occur within the Project area. No impact would occur in this regard.

U.S. Fish and Wildlife Service (USFWS) Critical Habitat. No critical habitat has been mapped by the USFWS within or adjacent to the Project Site. Since the Proposed Project would not result in the loss or adverse modification to Critical Habitat, consultation with the USFWS under Section 7 of the Federal Endangered Species Act (FESA) would not be required and no impact would occur in this regard.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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

Previous Significance Determination: The Initial Study for SEIR No. 339 concluded that the Platinum Triangle does not contain riparian habitat or other sensitive natural communities; thus, *PTMLUP* buildout would not impact riparian habitat or other sensitive natural communities and no mitigation was necessary. Because there were no impacts, these resources were not further analyzed in SEIR No. 339.

Project-Specific Analysis: A Jurisdictional Delineation was prepared for the Proposed Project and included a site visit to delineate U.S. Army Corps of Engineers (Corps), Santa Ana Regional Water Quality Control Board (Santa Ana RWQCB), and California Department of Fish and Wildlife's (CDFW) jurisdictional authority located within the Project Site; refer to [Appendix B](#). Based on the Jurisdictional Delineation, the Proposed Project would result in 0.03-acre of permanent impacts and 1.12 acres of temporary impacts to



CDFW un-vegetated streambed. As a result, Project implementation would require the following State and Federal permits: Corps Section 408 Permit and Section 404 Nationwide Permit 14 Linear Transportation Projects, Regional Board Section 401 Water Quality Certification, and CDFW 1602 Streambed Alteration Agreement. Following approval of the required State and Federal permits, no impacts to riparian habitat or other sensitive natural communities would occur, and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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

This impact threshold was modified by the OPR in 2018. The changes to this threshold of significance consist of refinements and clarifications of existing requirements. Although the specific language for this threshold of significance has changed, the analysis was considered in the SEIR No. 339 Appendix A, *Notice of Preparation and Initial Study*.

Previous Significance Determination: The Initial Study for SEIR No. 339 concluded that the Platinum Triangle does not contain wetlands; thus, *PTMLUP* buildout would not impact federally protect wetlands and no mitigation was necessary. Because there were no impacts, these resources were not further analyzed in SEIR No. 339.

Project-Specific Analysis: No substantial change from previous analysis. According to the Jurisdictional Delineation, the Project Site does not support wetland features; refer to [Appendix B](#). Therefore, no impacts associated with federally protected wetlands would occur, and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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

Previous Significance Determination: The Initial Study for SEIR No. 339 concluded that the Platinum Triangle does not contain areas associated with wildlife corridors or nursery sites; thus, *PTMLUP* buildout would not impact migratory wildlife corridors and native wildlife nursery sites and no mitigation was necessary. Because there were no impacts, these resources were not further analyzed in SEIR No. 339.

Project-Specific Analysis: No substantial change from previous analysis. Due to the highly disturbed nature of the Project Site and surrounding areas, the Project Site does not currently function as a migratory corridor or linkage. In addition, the Santa Ana River is sand-bottomed, regularly maintained, and devoid of vegetation communities and does not function as a migratory corridor or linkage. The extensive amount of existing urban development along with the existing roadways, including Orangewood Avenue, Gene Autry Way, and State College Boulevard, creates a highly fragmented, noncontiguous landscape that is not conducive to substantial wildlife movement. Therefore, no impacts associated with wildlife movement corridors or nursery sites would occur, and the level of impact would not increase from those levels identified in SEIR No. 339.



Significance Determination: No substantial increase in the level of impact from previous analysis.

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

Previous Significance Determination: The Initial Study for SEIR No. 339 concluded that the Platinum Triangle area was not subject to a tree preservation ordinance or other local regulation protecting biological resources; thus, *PTMLUP* buildout would not conflict with local policies or ordinances protecting biological resources and no mitigation was necessary. Because there were no impacts, this topic not further analyzed in SEIR No. 339.

Project-Specific Analysis: Pursuant to *Anaheim Municipal Code* Chapter 11.12, Designation of Landmark Trees, the Anaheim City Council has the authority to designate any tree on public property as a landmark tree. *Anaheim Municipal Code* Section 13.12.080, Interference with Street Trees – Permission Required, states that no person shall remove a street tree without the written permission of the Anaheim Director of Community Services. Similarly, *Orange Municipal Code* Section 12.28.020, Permit – Required for Removal or Planting, states that no person shall plant or remove any tree or shrub within public street or right-of-way without having first obtained a permit from the City.

At the time of this writing, the Proposed Project does not include any tree removal activities. Further, no trees in the Project vicinity are designated as landmark trees as defined in *Anaheim Municipal Code* Chapter 11.12. Any tree removal, if deemed necessary, would occur in conformance with *Anaheim Municipal Code* Section 13.12.080 and *Orange Municipal Code* Section 12.28.020. Thus, the Proposed Project would not conflict with any local policies or ordinances protecting biological resources. Therefore, conformance with City requirements would ensure no impacts associated with local policies or ordinances would occur, and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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

Previous Significance Determination: The Initial Study for SEIR No. 339 concluded that the Platinum Triangle is not affected by a habitat conservation plan (HCP), natural community conservation plan (NCCP), or other adopted local, regional, or State habitat conservation plan; thus, *PTMLUP* buildout would not conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or State habitat conservation plan and no mitigation was necessary. Because there were no impacts, these resources were not further analyzed in SEIR No. 339.

Project-Specific Analysis: According to the *County of Orange (Central/Coastal) NCCP/HCP*, the Platinum Triangle is not affected by the NCCP/HCP conservation plan area. Thus, Project implementation would not conflict with the provisions of an adopted HCP, NCCP, or other adopted local, regional, or State habitat conservation plan, and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.



3.4.1 MITIGATION PROGRAM

Mitigation Measures from SEIR No. 332

SEIR No. 332 does not include mitigation measures for biological resources.

Mitigation Measures from SEIR No. 339

SEIR No. 339 does not include mitigation measures biological resources.



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3.5 CULTURAL RESOURCES

<i>Would the project:</i>	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
a. Cause a substantial adverse change in the significance of a historical resource pursuant to <i>CEQA Guidelines</i> Section 15064.5?				✓
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to <i>CEQA Guidelines</i> Section 15064.5?				✓
d. Disturb any human remains, including those interred outside of dedicated cemeteries?				✓

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to *CEQA Guidelines* Section 15064.5?

This impact threshold was modified by the OPR in 2018. The changes to this threshold of significance consist of refinements and clarifications of existing requirements. Although the specific language for this threshold of significance has changed, the analysis was considered in the SEIR No. 339 in Appendix A, *Notice of Preparation and Initial Study*.

Previous Significance Determination: The Initial Study for SEIR No. 339 concluded that the Platinum Triangle does not contain any historical resources as defined by *CEQA Guidelines* Section 15064.5. The Platinum Triangle is not located within the Anaheim Colony Historic District and none of the structures within the *PTMLUP* area were identified on the Qualified Historic Structures list of the *Anaheim Colony Historic District Preservation Plan*. No known historic archaeological sites within the *PTMLUP* were identified. The Initial Study concluded that no impacts would occur and no mitigation was necessary. Because there were no impacts, these resources were not further analyzed in SEIR No. 339.

Project-Specific Analysis: Historic resources generally consist of buildings, structures, improvements, and remnants associated with a significant historic event or person(s) and/or having a historically significant style, design, or achievement. Damage to or demolition of such resources is typically a significant impact. Impacts to historic resources can occur through direct impacts, such as destruction or removal, and through indirect impacts, such as a change in the setting of a historic resource. According to SEIR No. 339 Addendum No. 7, 13 National Register of Historic Places-listed properties are located within the City of Anaheim. According to *Orange General Plan EIR* Figure 5.5-1 (Designated Historic Resources), 11 NRHP-designated resources are located within the City of Orange.

The Project Site encompasses an approximately half-mile long segment of Orangewood Avenue and the Santa Ana River reorganizational area. Based on SEIR No. 339 Addendum No. 7 and *Orange General Plan EIR* Figure 5.5-1, no known historic resources are located within or directly adjacent to the Proposed Project. Thus, Project implementation would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064, and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.



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

Previous Significance Determination: The Initial Study for SEIR No. 339 concluded that the *PTMLUP* area does not contain any known archaeological resources since the Platinum Triangle area has already been disturbed and the potential for subsurface resource is remote. There are no known prehistoric/historic archaeological sites located within the *PTMLUP* area. No impact to pre-historic or historic archaeological resources were identified and no mitigation was required. Because there were no impacts, these resources were not further analyzed in SEIR No. 339.

Project-Specific Analysis: Archaeological sites are locations that contain resources associated with former human activities and may contain such resources as human skeletal remains, waste from tool manufacture, tool concentrations, and/or discoloration or accumulation of soil or food remains. As concluded in SEIR No. 339 and its subsequent addendums, no pre-historic or historic archaeological resources have been identified in the *PTMLUP* area. The Project would occur along a fully-improved segment of Orangewood Avenue surrounded by developed uses. In addition, the Project's proposed Santa Ana River Trail improvements would occur within a heavily disturbed segment of the River that has been subject to channelization and frequent human use. Thus, Project-related ground disturbing activities would have a remote potential to uncover previously-unknown buried resources. Further, the proposed amendments to the General Plan, Zoning Map and *PTMLUP* associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development would be subject to CEQA and analyzed on a per project basis. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339.

Nonetheless, in compliance with 14 CCR Section 15064.5, if Project construction results in the inadvertent discovery of subsurface archaeological resources, all construction activities within 100 feet of the find would immediately halt until a qualified archaeologist that meets the Secretary of the Interior's Professional Qualification Standards for Archaeology evaluates the significance of the find and determines whether additional study is warranted. Depending on the significance of the find, the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery, may be warranted. Compliance with existing State regulatory requirements would ensure impacts concerning archaeological resources are less than significant, and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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

Previous Significance Determination: The Initial Study for SEIR No. 339 determined that the Platinum Triangle does not contain human remains, including those outside of formal cemeteries since the *PTMLUP* area has already been disturbed and the potential for any subsurface cultural resources is remote. The Initial Study for SEIR No. 339 determined that the *PTMLUP* would have no impact to human remains and no mitigation was necessary. Because there were no impacts, these resources were not further analyzed in SEIR No. 339.



Project-Specific Analysis: Consistent with the findings of the Initial Study for SEIR No. 339, it is not anticipated that human remains or informal cemetery areas are present on the Project Site; however, all ground-disturbing activities, such as grading or excavation have the potential to inadvertently disturb human remains. If human remains are found, those remains would require proper treatment in accordance with applicable laws. PRC Section 5097.98 and Health and Safety Code Sections 7050.5–7055 describe the general provisions regarding human remains, including the requirements if any human remains are accidentally discovered during Project construction.

As required by State law, procedures set forth in PRC Section 5097.98 would be implemented, including notification of the County Coroner, notification of the Native American Heritage Commission, and consultation with the individual identified by the Native American Heritage Commission to be the “most likely descendant.” Compliance with existing State regulations, which detail the appropriate actions necessary in the unlikely event that human remains are uncovered, would ensure that Project implementation does not impact human remains, and the level of impact would not increase from that identified in SEIR No. 339.

3.5.1 MITIGATION PROGRAM

Mitigation Measures from SEIR No. 332

SEIR No. 332 does not include mitigation measures for cultural resources.

Mitigation Measures from SEIR No. 339

SEIR No. 339 does not include mitigation measures for cultural resources.



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3.6 ENERGY

The previously certified SEIR No. 339 did not evaluate energy as it was not required in the CEQA Guidelines at the time SEIR No. 339 was prepared.

On October 26, 2010, the City of Anaheim certified the SEIR No. 339 that analyzed the potential impacts associated with development of the revised Platinum Triangle Expansion Project. Although this previous environmental document did not include an energy analysis, a supplemental environmental analysis of energy impacts cannot be required absent new information on that front. The implementation of project design features and mitigation measures related to energy efficiency have typically been incorporated into a project’s air quality analysis. Additionally, Public Resources Code Section 21100(b)(3) and CEQA Guidelines Section 15126.4 require EIRs to describe, where relevant, the wasteful, inefficient, and unnecessary consumption of energy caused by a project. Thus, the effect of energy usage could have been raised in 2010 when the City considered the EIR. A challenge to an EIR must be brought within 30 days of the lead agency’s notice of approval. (Pub. Resources Code, § 21167[b].) Under Public Resources Code Section 21166(c), an agency may not require a supplemental environmental review unless new information, which was not known and could not have been known at the time the EIR was approved, becomes available. After a project has been subjected to environmental review, the statutory presumption flips in favor of the project proponent and against further review. (Moss v. County of Humboldt [2008] 162 Cal.App.4th 1041, 1049-1050.) “[S]ection 21166 comes into play precisely because in-depth review has already occurred [and] the time for challenging the sufficiency of the original EIR has long since expired.” (Id., 1050.) There is no competent evidence of new information of severe impact, and thus the City may rely on an addendum. Accordingly, the City finds that energy is not “new information” under Public Resources Code Section 21166.

<i>Would the project:</i>	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?				✓
b. Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?				✓

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

Previous Significance Determination: As detailed in SEIR No. 339, Project implementation would be required to comply with mandated energy efficiency programs and regulations the California Building Energy Efficiency Standards (Title 24) of the California Building Code (CBC). Future development of structures would be required to submit energy calculations that demonstrate each new structure exceeds Title 24 standards by 10 percent (SEIR No. 339 Mitigation Measure 2-6 and SEIR No. 332 Mitigation



Measure 10-21) and would be subject to several specified Title 24 energy saving practices (SEIR No. 332 Mitigation Measure 10-22).

Project-Specific Analysis: The Project would not result in an increase in construction-related or operational energy demand beyond that anticipated for the Revised Platinum Triangle Expansion Project. As a roadway widening and annexation project, the Project does not propose habitable structures and is limited to widening an existing segment of Orangewood Avenue and associated utility infrastructure improvements. These types of improvements would not have the potential to result in a significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during Project operation. SEIR No. 339 Mitigation Measure 2-6 and SEIR No. 332 Mitigation Measures 10-21 and 10-22 would not apply to the Proposed Project in this regard. Project lighting would be similar to existing lighting sources along Orangewood Avenue and would be subject to the applicable energy efficiency programs and regulations detailed above. The proposed amendments to the General Plan, Zoning Map and PTMLUP associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development would be subject to CEQA and analyzed on a per project basis. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339. Thus, the Proposed Project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation and a less than significant impact would occur. As noted above, the City has determined that energy does not constitute new significant information under Public Resources Code Section 21166.

Significance Determination: No increase in significant impacts has resulted.

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

Previous Significance Determination: SEIR No. 339 determined that the Project would be required to comply with the California Building Energy Efficiency Standards of the CBC. In addition, mitigation measures were included in ensure structural development exceeds Title 24 standards by 10 percent and is subject to Title 24 energy saving practices (SEIR No. 339 Mitigation Measure 2-6 and SEIR No. 332 Mitigation Measures 10-21 and 10-22).

Project-Specific Analysis: As discussed, the Project would be required to comply with all applicable energy efficiency programs and regulations. Impacts in this regard would be less than significant. As a roadway improvement and annexation project, the Project would not be subject to SEIR No. 339 Mitigation Measure 2-6 and SEIR No. 332 Mitigation Measures 10-21 and 10-22. As noted above, the City has determined that energy does not constitute new information under Public Resources Code Section 21166.

Significance Determination: No increase in significant impacts has resulted.

3.6.1 MITIGATION PROGRAM

Mitigation Measures from SEIR No. 332

SEIR No. 332 mitigation measures are not applicable to the Proposed Project.



Mitigation Measures from SEIR No. 339

SEIR No. 339 mitigation measures are not applicable to the Proposed Project.



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3.7 GEOLOGY AND SOILS

<i>Would the project:</i>	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1) 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.				✓
2) Strong seismic ground shaking?				✓
3) Seismic-related ground failure, including liquefaction?				✓
4) Landslides?				✓
b. Result in substantial soil erosion or the loss of topsoil?				✓
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				✓
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?				✓
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				✓
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				✓

a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

This impact threshold was modified by the OPR in 2018. The changes to this threshold of significance consist of refinements and clarifications of existing requirements. Although the specific language for this threshold of significance has changed, the analysis was considered in the SEIR No. 339 Appendix A.

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.

Previous Significance Determination: The Initial Study for SEIR No. 339 concluded that the *PTMLUP* area is not underlain by Alquist-Priolo Earthquake Fault Zone; thus, PLMLUP buildout would not involve impacts associated with earthquake fault rupture and no mitigation was necessary. Because there were no impacts, these impacts were not further analyzed in SEIR No. 339.



Project-Specific Analysis: The Project Site, like the rest of Southern California, is situated within a seismically active region as the result of being located near the active margin between the North American and Pacific tectonic plates. However, the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone.⁷ Further, no known or potentially active faults traverse the Project Site. As indicated in SEIR No. 339 Addendum No. 7, the El Modeno and Peralta Hill faults are the closest active faults to the Project Site, which are located approximately three miles to the northeast.

As a roadway widening project, the Proposed Project does not propose habitable structures and is limited to widening an existing segment of Orangewood Avenue and associated utility infrastructure improvements. These types of improvements are not particularly at-risk to earthquake-induced damage; thus, Project implementation would not increase the risk of loss, injury, or death associated with fault rupture. The proposed amendments to the General Plan, Zoning Map and PTMLUP associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development would be subject to CEQA and analyzed on a per project basis. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339. Therefore, no impacts associated with fault rupture would result, and the level of impact from the Proposed Project would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

ii) Strong seismic ground shaking?

Previous Significance Determination: The Initial Study for SEIR No. 339 concluded that the *PTMLUP* area may be exposed to impacts from earthquakes, including strong seismic ground shaking; thus, impacts associated with strong seismic ground shaking would be less than significant. Because there were less than significant impacts, these impacts were not further analyzed in SEIR No. 339.

Project-Specific Analysis:

As indicated in Response 3.6 (a)(i), the El Modeno and Peralta Hill faults are in proximity to the Proposed Project, both of which have the potential to induce strong seismic ground shaking. The Project's design, engineering, and installation would be subject to all applicable seismic design requirements in place to protect infrastructure from the effects of seismic ground shaking. As described above, the proposed roadway improvements do not involve the construction of habitable structures, and its implementation would not increase the potential for human injury, loss, or death. The proposed amendments to the General Plan, Zoning Map and PTMLUP associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development would be subject to CEQA and analyzed on a per project basis. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339. For these reasons, impacts concerning strong seismic ground shaking would be less than significant, and the level of impact associated with the Proposed Project would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

⁷ California Department of Conservation, *Seismic Hazard Zone Map for the Anaheim Quadrangle*, Released April 15, 1998.



iii) Seismic-related ground failure, including liquefaction?

Previous Significance Determination: SEIR No. 339 concluded that impacts associated with seismic-related ground failure, including liquefaction would be less than significant following conformance with required codes and SEIR No. 332 MM 5.3-1 through MM 5.3-6. Because there were less than significant impacts, these impacts were not further analyzed in SEIR No. 339.

Project-Specific Analysis: According to the *Orange General Plan* Figure 5.6-2 (Environmental and Natural Hazard Policy Map), portions of the Project Site generally east of the Orangewood Avenue/SR-57 Interchange are prone to liquefaction. Due to the nature of the Project's proposed improvements, settlement as the result of liquefaction following a seismic event would likely be minimal. Nonetheless, placement and compaction of fill would be subject to conformance with the City of Anaheim and City of Orange Grading Standards to the satisfaction of a qualified geotechnical engineer (soil engineer) in addition to SEIR No. 332 MM 5.3-1 through MM 5.3-4 and MM 5.3-6. SEIR No. 332 MM 5.3-5 pertain to habitable structures and thus is not applicable to the Proposed Project. The roadway improvements would not significantly expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure. The proposed amendments to the General Plan, Zoning Map and PTMLUP associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development would be subject to CEQA and analyzed on a per project basis. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339. Impacts concerning seismic-related ground failure would be less than significant following conformance with SEIR No. 332 MM 5.3-1 through MM 5.3-4 and MM 5.3-6, and the level of impact for the Proposed Project would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

iv) Landslides?

Previous Significance Determination: The Initial Study for the SEIR No. 339 concluded that the *PTMLUP* area does not contain any major slopes on or in the immediate vicinity which would represent a landslide hazard; thus, *PTMLUP* buildout would not involve impacts associated with landslides and no mitigation was necessary. Because there were no impacts, these resources were not further analyzed in SEIR No. 339.

Project-Specific Analysis:

According to the *Orange General Plan* Figure 5.6-2, the Project Site is not located within an area susceptible to seismically-induced landslides. Therefore, no impacts associated with landslides would occur, and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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

Previous Significance Determination: The Initial Study for SEIR No. 339 concluded soils within the *PTMLUP* have a slight erosion potential, but buildout would involve less than significant impacts concerning substantial soil erosion and loss of topsoil following conformance with existing regulatory



requirements for erosion control. In addition, development projects involving one or more acres would require compliance with a National Pollutant Discharge Elimination System (NPDES) permit and implementation of a stormwater pollution prevention plan (SWPPP) during construction for erosion control. Adherence to existing regulatory requirements would reduce erosion impacts to less than significant. Because there were less than significant impacts, these impacts were not further analyzed in SEIR No. 339.

Project-Specific Analysis:

Soil erosion is most prevalent in unconsolidated alluvium and surficial soils and in areas that have slopes. According to SEIR No. 339, the Project area includes soils with slight erosion potential. The proposed roadway improvements would occur along a generally flat segment of Orangewood Avenue where the potential for soil erosion would be minimal. However, construction activities occurring within the Santa Ana River associated with the roadway widening would displace topsoils and temporarily increase the potential for displaced soils to be subject to wind and water erosion.

To reduce the Project's potential to result in loss of topsoil, the Project would be required to meet the grading standards identified by the City of Anaheim and City of Orange, as applicable. Further, in accordance with NPDES requirements, Project implementation would require preparation of a SWPPP for approval prior to grading activities. The SWPPP would include site-specific best management practices (BMPs) to be implemented with the Project to prevent erosion, minimize siltation from impacting downstream water bodies, and protect water quality. All grading operations, land clearing, loading, stockpiling, landscaping, and construction haul routes would also be subject to SCAQMD Rule 403, Fugitive Dust Emissions, as required by SEIR No. 339 MM 2-2. Compliance with SCAQMD Rule 403, as well as preparation of a SWPPP would reduce the potential for on-site and off-site erosion impacts. The proposed amendments to the General Plan, Zoning Map and PTMLUP associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development would be subject to CEQA and analyzed on a per project basis. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339. Therefore, impacts associated with erosion would be less than significant, and the level of impact for the Proposed Project would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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

Previous Significance Determination: The Initial Study for SEIR No. 339 concluded that impacts associated with a geologic unit or soil that is unstable to be less than significant. Because there were less than significant impacts, these impacts were not further analyzed in SEIR No. 339.

Project-Specific Analysis: According to the SEIR No. 339, the near-surface soils in the Platinum Triangle area are generally medium-dense, fine, and fine-to-medium-dense sand with occasional traces of gravel and infrequent seams of silt. The expansion potential for these soils is considered low. These soils are part of hydrologic group A, which exhibits high infiltration properties. The *Orange General Plan EIR* does not identify the Project Site as located within an area subject to landslide hazards; refer also to Response 3.6 (a) (IV) above. However, portions of the Project Site east of the Orangewood Avenue/SR-57



Interchange (generally near the Santa Ana River) are prone to liquefaction according to the *Orange General Plan EIR*; refer also to Response 3.6 (a) (III) above. All Project improvements would be designed and constructed in conformance with the California Building Standards Code seismic engineering standards, as well as with City of Anaheim and City of Orange grading standards, as applicable, in addition to SEIR No. 332 MM 5.3-1 through MM 5.3-4 and MM 5.3-6. Pursuant to SEIR No. 332 MM 5.3-1, development activities within a seismic hazard zone would require preparation of a site-specific report in compliance with DMG Special Publication 117, *Guidelines for Evaluating and Mitigating Seismic Hazards*. Impacts would be less than significant following conformance with SEIR No. 332 MM 5.3-1 through MM 5.3-4 and MM 5.3-6, and the level of impact would not increase from that identified in SEIR No. 339. The proposed amendments to the General Plan, Zoning Map and PTMLUP associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development would be subject to CEQA and analyzed on a per project basis. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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

This impact threshold was modified by the OPR in 2018. The changes to this threshold of significance consist of refinements and clarifications of existing requirements. Although the specific language for this threshold of significance has changed, the analysis was considered in the SEIR No. 339 Appendix A.

Previous Significance Determination: The Initial Study for SEIR No. 339 indicated that the near-surface soils within the PTLMUP are generally medium-dense, fine and fine-to-medium sand with occasional traces of gravel and infrequent streams of silt. Based on these characteristics, the expansion potential for these soils is considered low. In addition, development projects would require compliance with the California Building Standards Code and *Anaheim Municipal Code* Title 17. Adherence to existing regulatory requirements would reduce expansive soil impacts to less than significant. Therefore, this topic was not further addressed in SEIR No. 339.

Project-Specific Analysis: Expansive soils are those that undergo volume changes as moisture content fluctuates, swelling substantially when wet or shrinking when dry. Soil expansion can damage structures by cracking foundations, causing settlement, and distorting structural elements. According to SEIR No. 339 Addendum No. 7, the expansion potential for surface soils within the Project area (primarily medium-dense, fine, and fine-to-medium sand with occasional traces of gravel and infrequent seams of silt) is considered low. As noted previously, the roadway improvements would not significantly expose people or property to risk of expansive soils. Nonetheless, roadway construction would occur based on the recommendations of a geotechnical engineer as part of the final design process. Conformance with such measures would ensure impacts concerning expansive soils would be less than significant, and the level of impact would not increase from that identified in SEIR No. 339. The proposed amendments to the General Plan, Zoning Map and PTMLUP associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development would be subject to CEQA and analyzed on a per project basis. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339. Therefore, the level of impact for the Proposed Project would not increase from that identified in SEIR No. 339.



Significance Determination: No substantial increase in the level of impact from previous analysis.

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

Previous Significance Determination: The Initial Study for the SEIR No. 339 concluded that the Platinum Triangle would not use of septic tanks or alternative sewer disposal systems; thus, *PTMLUP* buildout would not involve impacts associated with septic tanks or alternative sewer disposal systems and no mitigation was necessary. Therefore, this topic was not further addressed in SEIR No. 339.

Project-Specific Analysis: As a roadway widening project, alternative wastewater disposal systems are not proposed nor required. The proposed amendments to the General Plan, Zoning Map and *PTMLUP* associated with the Santa Ana River reorganization portion of this project reflect anticipated future development of these areas, but not a specific development project. Any future development would be subject to CEQA and analyzed on a per project basis. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339. Therefore, no impact would occur, and the level of impact from the Proposed Project would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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

Previous Significance Determination: The Initial Study for SEIR No. 339 concluded that the *PTMLUP* area has already been disturbed and thus the potential for any subsurface paleontological resources is remote; thus, *PTMLUP* buildout would not impact paleontological resources and no mitigation was necessary. Because there were no impacts, these resources were not further analyzed in SEIR No. 339.

Project-Specific Analysis: The Project site includes a fully-improved segment of Orangewood Avenue and area along the Santa Ana River, surrounded by developed uses. In addition, the Project's proposed Santa Ana River Trail improvements would occur within a heavily disturbed segment of the River that has been subject to channelization and frequent human interference. As the Project Site is located within a developed area subject to past disturbance, the potential for the inadvertent discovery of paleontological resources is considered remote. The proposed amendments to the General Plan, Zoning Map and *PTMLUP* associated with the Santa Ana River reorganization portion of this project reflect anticipated future development of these areas, but not a specific development project. Any future development would be subject to CEQA and analyzed on a per project basis. Therefore, the Project would not impact paleontological resources, and the level of impact would not increase from that identified in SEIR No. 339.

The Project Site is situated within a developed and urbanized area, and there are no unique geologic features within the Project vicinity. Therefore, the Project would not impact unique geologic features, and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.



3.7.1 MITIGATION PROGRAM

Mitigation Measures from SEIR No. 332

SEIR No. 332 includes measures to reduce potential impacts associated development and infrastructure improvements within the Platinum Triangle. The following measures from SEIR No. 332 are applicable to the Proposed Project.⁸ Any modifications to the original measures are shown in ~~strikethrough~~ for deleted text and new, inserted text is underlined.

- 5.3-1 Prior to approval of a grading plan, if within a Seismic Hazard Zone, the ~~property owner/developer~~ City shall submit to the Public Works Department a site-specific report in compliance with DMG Special Publication 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California. The report shall be prepared by an engineering geologist and geotechnical engineer. All grading shall be in conformance with Title 17 of the *Anaheim Municipal Code*.
- 5.3-2 During the Plans, Specifications, and Estimate phase ~~Prior to issuance of a building permit, the property owner/developer~~ City shall submit to the ~~Planning Department, Building Division, Public Works Department, Development Services Division,~~ for review and approval, detailed foundation design information for the proposed ~~structures~~buildings, prepared by a civil engineer, based on recommendations of a geotechnical engineer.
- 5.3-3 During the Plans, Specifications, and Estimate phase ~~Prior to issuance of a building permit, the property owner/developer~~ City shall submit to the Public Works Department, Development Services Division, ~~Planning Department, Building Division,~~ a report prepared by a geotechnical engineer for review and approval which shall investigate the subject foundation excavations.
- 5.3-4 During the Plans, Specifications, and Estimate phase ~~Prior to issuance of a building permit, the property owner/developer~~ City shall submit to the Public Works Department, Development Services Division, ~~Planning Department, Building Division,~~ plans showing that the proposed structure(s) has been analyzed for earthquake loading and designed according to the most recent seismic standards in the Uniform Building Code adopted by the City of Anaheim.
- 5.3-6 On-going during grading operations, the ~~property owner/developer~~ City shall implement standard practices from City Ordinance (Title 17) and policies to the satisfaction of the Public Works Department, Field Engineering Division.

Mitigation Measures from SEIR No. 339

SEIR No. 339 does not include mitigation measures for geology and soils.

⁸ Mitigation measure numbering corresponds to the *Final Platinum Triangle Subsequent Environmental Impact Report Appendix A*, Updated and Modified Mitigation Monitoring Program Number 106A, dated August 2005.



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3.8 GREENHOUSE GAS EMISSIONS

<i>Would the project:</i>	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?				✓
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				✓

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

Previous Significance Determination: SEIR No. 339 concluded that *PTMLUP* buildout had the potential to generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment. Specifically, SEIR No. 339 found that the project evaluated in the SEIR would generate substantially more GHG emissions compared to the adopted *PTMLUP* and would cumulatively contribute to climate change impacts in California. Mitigation measures from several environmental sections of SEIR No. 339 were identified to reduce GHG emissions, including: MM 2-3, MM 2-5, MM 2-6, MM 9-1, MM 9-2, MM 9-12, MM 9-14, MM 10-7, MM 10-9, MM 10-12, MM 10-13, MM 10-14, MM 10-18, MM 10-19, MM 10-20, MM 10-21, MM 10-22, and MM 10-24. Despite implementation of the abovementioned mitigation measures, impacts related to GHG emissions were determined to remain significant and unavoidable, and a Statement of Overriding Considerations was adopted by the City Council when SEIR No. 339 was certified.

Project-Specific Analysis: Roadway construction would generate GHG emissions, as GHGs would be emitted through the operation of construction equipment and from worker and vendor vehicles, each of which typically use fossil-based fuels to operate. The combustion of fossil-based fuels creates GHG emissions such as carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). Furthermore, CH₄ is emitted during the fueling of heavy equipment. Despite the Project’s potential to generate construction-related GHGs, the changes proposed under this Addendum would not significantly worsen the Project’s potential to result in direct or indirect construction-related GHG emissions. Construction activities would be similar to those identified under SEIR No. 336 and impacts would be less than significant.

None of the Project components identified in Section 2.3, Proposed Project would represent a new permanent stationary or mobile sources of GHG emissions. The Project does not include any new buildings which would represent a permanent source of stationary or energy source GHG emissions. Further, once completed, the Project would not result in a permanent increase in traffic; refer to Section 3.17. Project implementation would accommodate existing and predicted traffic demands associated with buildout of the *PTMLUP* and would not directly generate new traffic or increase the number of vehicles along the roadway. For these reasons, the Project would not generate quantifiable GHG emissions from long-term operations and SEIR No. 339 MM 2-3, MM 2-5, MM 2-6, MM 9-1, MM 9-2, MM 9-12, MM 9-14, MM 10-7, MM 10-9, MM 10-12, MM 10-13, MM 10-14, MM 10-18, MM 10-19, MM 10-



21, MM 10-22, and MM 10-24 are not applicable to the Proposed Project. The Project would demonstrate conformance with MM-10-20, included below, which requires preparation of a Demolition and Import/Export Plan which identifies offsite locations for materials export and disposal. Additionally, the Project improves a non-motorized transportation option by providing a sidewalk for pedestrians as well as expanded bicycle facilities.

The proposed amendments to the General Plan, Zoning Map and PTMLUP associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. The proposed amendments reflect anticipated future development of these areas, which is similar in intensity to what the General Plan already permits. Currently the General Plan designates the subject properties for Mixed Use Urban Core and Open Space land use. The proposed amendments for Area 1 and 1A would spread the intensities permitted General Plan Mixed-Use Urban Core land use designation over a slightly larger area; however, the amendments would not increase the maximum intensities permitted by the General Plan for the Platinum Triangle. The proposed amendments for Area 2 would change the land use designation for Open Space to Parks; the General Plan permits both uses at the same maximum FAR of 0.10. There would be no change in the General Plan designations for the remainder of the area subject to the reorganization. Any future development of the area subject to the reorganization would be subject to CEQA and analyzed on a per project basis. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339.

Therefore, the Project would not result in new permanent stationary or mobile sources of GHG emissions and the level of impact from the Project would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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

Previous Significance Determination: SEIR No. 339 concluded that the Platinum Triangle would not conflict with an applicable plan, policy, or regulation adopted for reducing the emissions of GHGs, as the Revised Platinum Triangle Expansion Project would be consistent with Statewide and regional GHG reduction goals. A less than significant impact was identified.

Project-Specific Analysis: Assembly Bill (AB) 32 is the legal mandate requiring that Statewide GHG emissions be reduced to 1990 levels by 2020. In addition, Statewide goals for GHG reductions in the years beyond 2020 have been recently codified into State law with the passage of Senate Bill (SB) 32. Signed into law on September 2016, SB 32 codifies the 2030 target in the recent Executive Order B 30 15 (40 percent below 1990 levels by 2030). The bill authorizes the State board to adopt an interim GHG emissions level target to be achieved by 2030. SB 32 states that the intent is for the Legislature and appropriate agencies to adopt complementary policies which ensure that the long-term emissions reductions advance specified criteria. However, at the time of writing this Initial Study, no specific policies or emissions reduction mechanisms have been established.

SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments – Connect SoCal (2020-2045 RTP/SCS), adopted September 3, 2020, is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The 2020-2045 RTP/SCS embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions,



tribal governments, nonprofit organizations, businesses, and local stakeholders in Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. The 2020-2045 RTP/SCS is forecast to help California reach its GHG reduction goals by reducing GHG emissions from passenger cars by eight percent below 2005 levels by 2020 and 19 percent by 2035 in accordance with the most recent CARB targets adopted in March 2018. The 2020-2045 RTP/SCS contains over 4,000 transportation projects, including highway improvements, railroad grade separations, bicycle lanes, new transit hubs, and replacement bridges. These future investments were included in county plans developed by the six-county transportation commissions and seek to reduce traffic bottlenecks, improve the efficiency of the region’s network, and expand mobility choices. The 2020-2045 RTP/SCS is an important planning document for the region, allowing project sponsors to qualify for Federal funding. In addition, the 2020-2045 RTP/SCS is supported by a combination of transportation and land use strategies that help the region achieve State GHG emission reduction goals and Federal CAA requirements, preserve open space areas, improve public health and roadway safety, support the vital goods movement industry, and utilize resources more efficiently. The Proposed Project’s consistency with the 2020-2045 RTP/SCS goals is analyzed in detail in Table 3.8-1, Consistency with SCAG’s 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy Goals.

Table 3.8-1
Consistency with SCAG’s 2020-2045 Regional Transportation
Plan/Sustainable Communities Strategy Goals

SCAG Goals	Compliance With Goal
Goal 1: Encourage regional economic prosperity and global competitiveness	<u>Not Applicable:</u> Due to the nature of the proposed improvements, Goal 1 is not a project-specific goal which would be applicable to the Project.
Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods	<u>Consistent:</u> The Project would widen Orangewood Avenue from a five-lane facility to six lanes and associated bicycle lane/sidewalk to accommodate existing and predicted traffic levels associated with buildout of the <i>PTMLUP</i> . Further, the proposed improvements would follow all applicable safety standards in applicable regulatory documents. Pedestrian walkways and bicycle routes must follow safety precautions and standards established by local (e.g., City of Anaheim and City of Orange) and regional (e.g., SCAG) agencies. Roadways for motorists must follow safety standards established for the local and regional plans. Thus, the Project would improve mobility and accessibility, as well as ensure travel safety and reliability for all people and goods in the region and would be consistent with Goal 2.
Goal 3: Enhance the preservation, security, and resilience of the regional transportation system	<u>Consistent:</u> Security issues involving roadways and evacuations are addressed in the City of Anaheim and City of Orange’s emergency management plans developed in accordance with State and Federal-mandated emergency management regulations. The Cities of Anaheim and Orange would continue to monitor Orangewood Avenue to determine the adequacy and safety of this roadway segment. Thus, the Project would enhance the preservation, security, and resilience of the transportation system and would be consistent with Goal 3.
Goal 4: Increase person and goods movement and travel choices within the transportation system	<u>Consistent:</u> The Project would widen Orangewood Avenue from a five-lane facility to six lanes to accommodate existing and predicted traffic levels associated with buildout of the <i>PTMLUP</i> . Additionally, the Project would accommodate bicycle and sidewalk facilities. Thus, Project implementation would increase person and goods movement, as well as travel choices, within the transportation system and the Project would be consistent with Goal 4.



Table 3.8-1 (continued)
Consistency with SCAG’s 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy Goals

SCAG Goals	Compliance With Goal
Goal 5: Reduce greenhouse gas emissions and improve air quality	<u>Consistent</u> : The Project improves a non-motorized transportation option by providing a sidewalk for pedestrians and expands existing bicycle facilities. Therefore, the Project would encourage non-motorized transportation, reduce GHG emissions, and improve air quality. Thus, the Project would be consistent with Goal 5.
Goal 6: Support healthy and equitable communities	<u>Consistent</u> : Refer to Response to Goal 5. The Project would support alternative modes of transportation, including walking and bicycling. As a result, the Project would reduce GHG emissions and improve air quality. Therefore, the Project would promote healthy and equitable communities and be consistent with Goal 6.
Goal 7: Adapt to a changing climate and support an integrated regional development pattern and transportation network	<u>Consistent</u> : The Project would widen Orangewood Avenue from a five-lane facility to six lanes to accommodate existing and predicted traffic levels associated with buildout of the <i>PTMLUP</i> , as well as accommodate bicycle and sidewalk facilities. However, the Project would not directly generate new traffic or increase the number of vehicles along the roadway. Therefore, the Project would encourage climate change adaptation by reducing GHG emissions and encouraging non-motorized transportation. The Project improvements would support the regional transportation network by accommodating existing and predicted traffic demands. Thus, the Project would be consistent with Goal 7.
Goal 8: Leverage new transportation technologies and data-driven solutions that result in more efficient travel	<u>Consistent</u> : The Project would support efficient travel by widening Orangewood Avenue to accommodate existing and predicted traffic demands. Thus, the Project would be consistent with Goal 8.
Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options	<u>Not Applicable</u> : Goal 9 focuses on housing supply and therefore does not apply to the proposed roadway improvement and annexation Project.
Goal 10: Promote conservation of natural and agricultural lands and restoration of habitats	<u>Not Applicable</u> : The Project does not include natural or agricultural lands. Therefore, Goal 10 does not apply to the proposed Project.
Source: Southern California Association of Governments, <i>2025-2040 Regional Transportation Plan/Sustainable Communities Strategy – Connect SoCal</i> , September 3, 2020.	

As proposed, the Project would not conflict with the 2020-2045 RTP/SCS goals. Thus, the Project would not conflict with an adopted plan, policy, or regulation pertaining to GHGs. Further, it is acknowledged that the proposed amendments to the General Plan, Zoning Map and PTMLUP associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. The proposed amendments reflect anticipated future development of these areas, which is similar in intensity to what the General Plan already permits. Currently the General Plan designates the subject properties for Mixed Use Urban Core and Open Space land use. The proposed amendments for Area 1 and 1A would spread the intensities permitted General Plan Mixed-Use Urban Core land use designation over a slightly larger area; however, the amendments would not increase the maximum intensities permitted by the General Plan for the Platinum Triangle. The proposed amendments for Area 2 would change the land use designation for Open Space to Parks; the General Plan permits both uses at the same maximum FAR of 0.10. There would be no change in the General Plan designations for the remainder of the area subject to the reorganization. Any future development of the area subject to the reorganization would be subject to CEQA and analyzed on a per project basis. Given that the permitted



type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339. Therefore, the Proposed Project would not result in new GHG impacts different from those identified for SEIR No. 339 and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

3.8.1 MITIGATION PROGRAM

Mitigation Measures from SEIR No. 332

Refer to the Mitigation Measures from SEIR No. 339 below, which are based on adopted Mitigation Measures from SEIR No. 332.

Mitigation Measures from SEIR No. 339

SEIR No. 339 includes measures to reduce potential impacts associated the development and infrastructure improvements within the Platinum Triangle. SEIR No. 339 also includes measures related to air quality, transportation and traffic, and utilities and service systems which would reduce GHG emissions; refer to Sections 3.3, Air Quality; 3.17; and 3.19, Utilities and Service Systems of this Addendum. The following measures from SEIR No. 339 are applicable to the Proposed Project.⁹ Any modifications to the original measures are shown in ~~strikethrough~~ for deleted text and new, inserted text is underlined. In addition to Air Quality MM 2-3 and MM 2-5, described above, the following measure is applicable to the Proposed Project:

MM 10-20 Prior to the approval of each grading plan (for import/export plan) ~~and prior to issuance of demolition permits (for demolition plans)~~, the ~~property owner/developer~~ City shall submit a Demolition and Import/Export Plans, if determined to be necessary by the Public Works Department, Traffic Engineering Division and/or Street and Sanitation Division. The plans shall include identification of off-site locations for material export from the project and options for disposal of excess material. These options may include recycling of materials on-site, sale to a broker or contractor, sale to a project in the vicinity or transport to an environmentally cleared landfill, with attempts made to move it within Orange County. The ~~property owner/developer~~ City shall offer recyclable building materials, such as asphalt or concrete for sale or removal by private firms or public agencies for use in construction of other projects, if all cannot be reused on the ~~project site~~ Project Site.

⁹ Mitigation measure numbering corresponds to Platinum Triangle Master Land Use Plan Appendix C, Updated and Modified Mitigation Monitoring Program Number 106C.



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3.9 HAZARDS AND HAZARDOUS MATERIALS

<i>Would the project:</i>	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				✓
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				✓
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				✓
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				✓
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				✓
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				✓
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				✓

This section is primarily based on the *Phase I Environmental Site Assessment for the Orangewood Avenue Improvements Project located in the Cities of Anaheim and Orange, California* (Phase I ESA), prepared by Michael Baker International, dated October 2017; refer to Appendix C, Phase I Environmental Site Assessment.

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

Previous Significance Determination: The Initial Study for SEIR No. 339 concluded that *PTMLUP* buildout would allow for the continued operation of businesses that use and store various hazardous materials. In addition, the *PTMLUP* has designated the northern periphery of the *PTMLUP* area as industrial. These areas may handle hazardous materials; however, businesses are required to obtain permits and maintain records regarding the storage, use and disposal of hazardous material. The Initial Study concluded that development of the *PTMLUP* would not change the existing condition of the project area and/or increase the use of hazardous materials in the area, and that adhering to the existing permitting process would ensure that less than significant hazard to the public or the environment occur.



Because these impacts were considered less than significant, they were not further analyzed in SEIR No. 339.

Project-Specific Analysis: Roadway construction may involve temporary hazards related to hazardous materials transport and use, including those used for typical construction activities (i.e., diesel fuel, motor oil, etc.). The Project's construction contractor(s) would be required to uphold standard best management practices to ensure that all hazardous materials are stored, transported, used, and disposed of in accordance with Federal and State law. Conformance with these standards would effectively avoid and minimize significant hazards related to the transport, use, and disposal of hazardous materials and would reduce the Project's impacts to less than significant levels, and the level of impact would not increase from that identified in SEIR No. 339. Orangewood Avenue would operate consistent with its existing condition relative to routine transport of hazardous materials.

The proposed amendments to the General Plan, Zoning Map and PTMLUP associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. The proposed amendments reflect anticipated future development of these areas, which is similar in intensity to what the General Plan already permits. Currently the General Plan designates the subject properties for Mixed Use Urban Core and Open Space land use. The proposed amendments for Area 1 and 1A would spread the intensities permitted General Plan Mixed-Use Urban Core land use designation over a slightly larger area; however, the amendments would not increase the maximum intensities permitted by the General Plan for the Platinum Triangle. The proposed amendments for Area 2 would change the land use designation for Open Space to Parks; the General Plan permits both uses at the same maximum FAR of 0.10. There would be no change in the General Plan designations for the remainder of the area subject to the reorganization. Any future development of the area subject to the reorganization would be subject to analysis, pursuant to CEQA, of hazards and hazardous materials impacts and measures would be proposed to reduce impacts, if required. However, the amendments do not involve a land use which would create a significant hazard to the environment due to the routine transport, use, or disposal of hazardous materials. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339. Thus, Project operations would not create a hazard related to the transport, use, and disposal of hazardous materials, and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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

Previous Significance Determination: The Initial Study for SEIR No. 339 concluded that the Platinum Triangle would not create a significant hazard to the public or environment due to accidental release of hazardous materials following conformance with existing Federal and State regulations. To further reduce risk of accidental release of hazardous materials into the environment, the Initial Study for SEIR No. 339 recommends implementation of MMP No. 106A MM 5.4-1 through MM 5.4-7, prepared for SEIR No 332. Because these impacts were considered less than significant, they were not further analyzed in SEIR No. 339.

Project-Specific Analysis: Refer to Response 3.8 (a). Project construction could result in the accidental release of hazardous substances such as spilling of petroleum-based fuels, lubricants, and other materials



used for construction equipment. Use, storage, transport, and disposal of these materials would be subject to standard construction standards safety procedures and controls that would avoid and minimize the potential for accidental release of hazardous substances into the environment. Standard construction best management practices would be observed such that any hazardous materials released are appropriately contained and remediated as required by local, State, and Federal law. Conformance with these standards would reduce impacts related to the accidental release of hazardous materials into the environment to less than significant levels, and the level of impact would not increase from that identified in SEIR No. 339.

In accordance with SEIR No. 332 MM 5.4-6, Michael Baker prepared a Phase I ESA in conformance with the scope and limitations of ASTM International (ASTM) *E 1527-13 Standard Practice for Environmental Site Assessments*. The Phase I ESA evaluated the potential for known hazardous sites in the area to potentially affect the subject site.

Recognized Environmental Conditions (RECs) indicates the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: 1) due to release to the environment; 2) under conditions indicative of a release to the environment; or 3) under conditions that pose a material threat of a future release to the environment. De minimis conditions are not considered RECs.

The Phase I ESA identified the following two RECs in connection with the Project Site:

- **Aerially Deposited Lead:** Aerially deposited lead refers to lead deposited on highway shoulders from past leaded fuel vehicle emissions. Based on historical aerial photographs and United States Geological Survey topographic maps, SR-57 was constructed in 1977. The potential for lead contamination to exist within exposed soils on-site due to aerially deposited lead is likely. It is Michael Baker's opinion that there is a REC on the subject site due to aerially deposited lead.
- **Groundwater Contamination:** The adjacent property located at 2023 Collins Street (approximately 2,420 feet up gradient of the Project Site) was found to have groundwater contamination extending to a maximum distance of 6,500 feet down gradient, which includes the Project Site and areas of propose right-of-way acquisition. For this reason, it is likely that the Project Site is underlain by contaminated groundwater. However, the groundwater is anticipated to be greater than 80 feet below ground surface; therefore, proposed construction activities are not anticipated to encounter groundwater.

Aerially Deposited Lead

Ground disturbance activities associated with Project construction activities could subject construction workers to aerially deposited lead. However, ground disturbance and spoils removal, transport, and cleanup procedures would conform to California Department of Toxic Substances Control (DTSC) guidelines. In compliance with SEIR No. 332 MM 5.4-1, if aerially deposited lead is discovered during site preparation or construction, the City of Anaheim would ensure that the identified hazardous waste and/or hazardous material is handled and disposed of in the manner specified by the State of California Hazardous Substances Control Law (Health and Safety Code, Division 20, Chapter 6.5) and according to the requirements of the California Administrative Code, Title 30, Chapter 22. In addition, the City would report the finding of hazardous waste to the Orange County Health Care Agency and Anaheim Fire Department (AFD). Conformance with these standards would reduce impacts related to aerially deposited lead to less than significant levels, and the level of impact would not increase from that identified in SEIR No. 339.



Groundwater Contamination

Ground disturbance activities associated with Project construction activities could result in the exposure of construction workers to contaminated groundwater. If dewatering discharge is piped to storm drains, the requirements of the De Minimis Waste Discharge Requirements for the Santa Ana Region (Order No. R8-2015-0004, NPDES No. CAG998001) would govern dewatering activities during construction. Compliance with Order No. 2003-0003-DWQ/Order No. R8-2015-0004, NPDES No. CAG998001 would ensure Project construction dewatering would not cause State waste discharge and Federal NPDES permit requirements to be exceeded. SEIR No. 332 MM 5.4-1 would further reduce impacts related to groundwater contamination to less than significant levels, and the level of impact would not increase from that identified in SEIR No. 339.

In addition to the potential for aerially deposited lead and groundwater contamination, portions of the Santa Ana River bridge overpass may include asbestos containing materials (ACM) and lead based paint (LBP) and existing traffic striping along Orangewood Avenue may also include LBP. The Phase I ESA does not identify a REC for ACM or LBP; however, these hazardous materials are likely present within the Project boundaries based on historical application. Thus, there is potential for accidental release during ground disturbance activities. All disturbance activities would conform to DTSC guidelines as well as SEIR No. 332 MM 5.4-1 and MM 5.4-7. SEIR MM 5.4-7 requires preparation of an asbestos survey. If ACM is identified, SEIR No. 332 MM 5.4-7 requires remediation and mitigation procedures conform with the Remediation Procedures Report, and in accordance with Federal, State, and local law. SEIR No. 332 also requires that structures constructed prior to 1973 are screened for LBP prior to demolition. If LBP is identified, SEIR No. 332 MM 5.4-7 requires it is mitigated in accordance with the procedures set forth in the Remediation Procedures Report. Conformance with DTSC Guidelines, as well as SEIR No. 332 MM 5.4-1 and MM 5.4-7 would ensure impacts related to accidental release of ACM and LBP are less than significant, and the level of impact would not increase from that identified in SEIR No. 339.

The Orangewood Avenue and the local roadway system would continue to operate as it does presently, except for the additional travel lane and other related Project improvements. Roadway maintenance activities could require limited quantities of hazardous materials, as needed; however, such activities would be temporary in nature and would be similar to the roadway segment's existing maintenance practices. No long-term impacts would occur in this regard, and the level of impact would not increase from that identified in SEIR No. 339.

The proposed amendments to the General Plan, Zoning Map and PTMLUP associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. The proposed amendments reflect anticipated future development of these areas, which is similar in intensity to what the General Plan already permits. Currently the General Plan designates the subject properties for Mixed Use Urban Core and Open Space land use. The proposed amendments for Area 1 and 1A would spread the intensities permitted General Plan Mixed-Use Urban Core land use designation over a slightly larger area; however, the amendments would not increase the maximum intensities permitted by the General Plan for the Platinum Triangle. The proposed amendments for Area 2 would change the land use designation for Open Space to Parks; the General Plan permits both uses at the same maximum FAR of 0.10. There would be no change in the General Plan designations for the remainder of the area subject to the reorganization. Any future development of the area subject to the reorganization would be subject to analysis pursuant to CEQA. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339. Therefore, no



long-term impacts would occur in this regard, and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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

Previous Significance Determination: The Initial Study for SEIR No. 339 concluded that the use and handling of hazardous materials, substances, and wastes within the *PTMLUP* would be subject to conformance with appropriate State and Federal rules and regulations through the permitting process and that no unauthorized use of hazardous materials would be allowed. Thus, although proposed mixed-use developments could emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or wastes within one-quarter mile of an existing or proposed school, impacts would be less than significant. Because these impacts were considered less than significant, they were not further analyzed in SEIR No. 339.

Project-Specific Analysis: The nearest school, Sycamore Elementary School, is located approximately 0.29-mile to the southeast of the Project Site at 340 Main Street in the City of Orange. No schools are located within one-quarter mile of the Project Site. Thus, no impacts associated with emitting hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school would result, and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

d) Would the project be located on a site that 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?

Previous Significance Determination: The Initial Study for SEIR No. 339 concluded that the Platinum Triangle would not involve significant impacts concerning hazardous materials sites following conformance with existing Federal and State regulations that govern hazardous material and waste management. To further reduce risk of accidental release of hazardous materials into the environment, the Initial Study for SEIR No. 339 recommends implementation of MMP No. 106A MM 5.4-1 through MM 5.4-7, prepared for SEIR No. 332. Because these impacts were considered less than significant, they were not further analyzed in SEIR No. 339.

Project-Specific Analysis: According to the Phase I ESA, the Project Site is not listed pursuant to Government Code Section 65962.5 (also known as the "Cortese Listing"). No impacts would result in this regard and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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



This impact threshold was modified by the OPR in 2018. The changes to this threshold of significance consist of refinements and clarifications of existing requirements. Although the specific language for this threshold of significance has changed, the analysis was considered in the SEIR No. 339 Appendix A.

Previous Significance Determination: The Initial Study for SEIR No. 339 concluded that the *PTMLUP* is not affected by the Airport Land Use Plan for the Los Alamitos Armed Forces Reserve Center or Fullerton Municipal Airport; thus, *PTMLUP* buildout would not result in a safety hazard for people residing or working in the project area and no mitigation was necessary. Because there were no impacts, they were not further analyzed in SEIR No. 339.

Project-Specific Analysis: The Initial Study for SEIR No. 339 found that the *PTMLUP* area is not located within an airport land use plan, nor is the area within two miles of a public airport. As a roadway widening and annexation project, the Project would not involve the installation of aboveground structures that could represent a safety hazard to air traffic. Therefore, no impacts associated with public airport safety hazards would occur, and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Previous Significance Determination: The Initial Study for SEIR No. 339 concluded that the City of Anaheim's emergency preparedness plan complied with State law and interfaced with other cities and counties within Southern California and that the City also participates in the Standardized Emergency Management System (SEMS). The Initial Study concluded that although *PTMLUP* buildout would intensify land uses within the Project area, impacts would be less than significant since all new development would be required to accommodate emergency vehicle. Because these impacts were considered less than significant, they were not further analyzed in SEIR No. 339.

Project-Specific Analysis: The City of Anaheim's *Hazard Mitigation Plan* and the City of Orange's *Multi-Hazard Functional Plan* were prepared in response to the Disaster Mitigation Act of 2000 to outline the operations and activities that would occur in the event of a disaster. Although the Project would temporarily impact traffic flow along Orangewood Avenue during construction, Project construction would not substantially interfere with traffic circulation as Project construction would occur over a limited timeframe and traffic lanes in each direction along Orangewood Avenue would remain open. No new development is proposed within the Santa Ana River reorganization area as part of this Project.

Over the long term, the roadway widening would improve traffic flows along the affected segment and therefore may enhance the roadway's function as an emergency access route, if necessary. The proposed Orangewood Avenue roadway widening is anticipated to improve area circulation opportunities. Project implementation would not require revisions to the City of Anaheim or City of Orange's adopted emergency response plans. If development is proposed in the Santa Ana River reorganization area in the future, analysis of hazards would be conducted at that time and measures would be proposed to reduce impacts, if required. Thus, impacts concerning emergency response or evacuation plans would be less than significant, and the level of impact would not increase from SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.



g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

This impact threshold was modified by the OPR in 2018. The changes to this threshold of significance consist of refinements and clarifications of existing requirements. Although the specific language for this threshold of significance has changed, the analysis was considered in the SEIR No. 339 Appendix A.

Previous Significance Determination: The Initial Study for SEIR No. 339 concluded that *PTMLUP* buildout would not expose people or structures to significant risk of loss, injury or death involving wildland fires since the *PTMLUP* area is developed and no undeveloped wildland areas are in or adjacent to the *PTMLUP* area. Because there were no impacts, they were not further analyzed in SEIR No. 339.

Project-Specific Analysis: The Project Site is not identified as a Wildland Fire Hazard Area by Figure 5.6-2 (Environmental and Natural Hazard Policy Map) of the *Orange General Plan EIR*. The Project Site is primarily surrounded by urban development in addition to a channelized portion of the Santa Ana River. As a roadway improvement project, the Project would not involve the construction of habitable structures which would expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. The proposed amendments to the General Plan, Zoning Map and *PTMLUP* associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development of the area subject to the reorganization would be subject to analysis pursuant to CEQA. Given that the permitted location, type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339. Therefore, no impacts associated with wildland fires would occur, and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

3.9.1 MITIGATION PROGRAM

Mitigation Measures from SEIR No. 332

SEIR No. 332 includes measures to reduce potential impacts associated development and infrastructure improvements within the Platinum Triangle. The following measures from SEIR No. 332 are applicable to the Proposed Project.¹⁰ Any modifications to the original measures are shown in ~~strike through~~ for deleted text and new, inserted text is underlined.

- 5.4-1** On-going during demolition and construction, in the event that hazardous waste is discovered during site preparation or construction, the ~~property owner/developer~~ City shall ensure that the identified hazardous waste and/or hazardous material is handled and disposed of in the manner specified by the State of California Hazardous Substances Control Law (Health and Safety Code, Division 20, Chapter 6.5) and according to the requirements of the California Administrative Code, Title 30, Chapter 22. In addition, the ~~property owner/developer~~ City shall report the finding of hazardous waste to the Orange County Health Care Agency and Anaheim Fire Department.

¹⁰ Mitigation measure numbering corresponds to the *Final Platinum Triangle Subsequent Environmental Impact Report Appendix A*, Updated and Modified Mitigation Monitoring Program Number 106A, dated August 2005.



- 5.4-2** On-going during project operation, the applicant City shall handle and dispose of all hazardous materials and wastes during the operation and maintenance of facilities in accordance with the State codes identified in Mitigation Measure No. 5.4-1 and under Anaheim Fire Department supervision.
- 5.4-6** Prior to issuance of grading permits for each development project, a Phase I Site Assessment shall be prepared by the ~~property owner/developer~~ City and submitted to the City of Anaheim Public Works Department, Development Services Division, for review and approval. If actual or potential impacts are identified by the Phase I, a Phase II ESA will be completed for the site by the ~~owner/developer~~ City and the results will be submitted to the Planning Department. During the Phase II ESA, samples from potential areas of concern will be collected and submitted for laboratory analysis to confirm the nature and extent of potential impacts. If hazardous materials are identified during the site assessments, the ~~property owner/developer~~ City shall notify the finding to the Anaheim Fire Department and the appropriate response/remedial measures will be implemented in accordance with the directives of the OCHCA and/or the Regional Water Quality Control Board (RWQCB), as appropriate. If soil is encountered during site development that is suspected of being impacted by hazardous materials, work will be halted and site conditions will be evaluated by a qualified environmental professional. The results of the evaluation will be submitted to OCHCA and/or RWQCB, and the appropriate response/remedial measures will be implemented, as directed by OCHCA, RWQCB, or other applicable oversight agency, until all specified requirements of the oversight agencies are satisfied and a no-further-action status is attained.
- 5.4-7** ~~Prior to issuance of a grading permit or a demolition permit for any building~~During the Plans, Specifications, and Estimate phase, an asbestos survey shall be conducted and submitted to the Planning Department, ~~Building Division, Public Works Department, Development Services Division~~, by the ~~property owner/developer~~ City. If the materials are found to contain asbestos fibers, demolition shall be conducted in accordance with the remediation and mitigation procedures detailed in Remediation Procedures Report, and in accordance with Federal, State, and local law. ~~Buildings-Structures~~ constructed prior to 1973 shall be screened for lead-based paint prior to demolition. If lead-based paint is identified, it shall be mitigated in accordance with the procedures set forth in the Remediation Procedures Report.

Mitigation Measures from SEIR No. 339

SEIR No. 339 does not include mitigation measures for hazards and hazardous materials.



3.10 HYDROLOGY AND WATER QUALITY

<i>Would the project:</i>	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?				✓
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				✓
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of stream or river or through the addition of impervious services, in a manner which would:				✓
1) Result in substantial erosion or siltation on- or off-site?				
2) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?				
3) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?				
4) Impede or redirect flood flows?				
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				✓
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				✓

A *Basis of Design Report Santa Ana River at Orangewood Avenue Bridge Crossing, Anaheim, California Scour Analysis* (Basis of Design Report) was prepared by Michael Baker in March 2020. This report is included as Appendix D, Basis of Design Report, and is summarized below.

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

This impact threshold was modified by the OPR in 2018. The changes to this threshold of significance consist of refinements and clarifications of existing requirements. Although the specific language for this threshold of significance has changed, the analysis was considered in the SEIR No. 339 Appendix A.

Previous Significance Determination: The Initial Study for SEIR No. 339 concluded that compliance with current water quality regulations associated with the City of Anaheim’s Local Implementation Plan, the Orange County Drainage Area Management Plan (DAMP), and the County area-wide Storm Water



Runoff Permit would reduce potential water quality impacts to a less than significant level. Because these impacts were considered less than significant, they were not further analyzed in SEIR No. 339.

Project-Specific Analysis:

CONSTRUCTION-RELATED IMPACTS

Surface water quality is subject to Federal, State, and local water quality requirements administered and enforced by the EPA, the California State Water Resources Control Board (SWRCB), and the RWQCB with cooperation from each county. The principal law governing pollution of the nation's surface waters is the CWA (formerly the Federal Water Pollution Control Act). Under the CWA, regulatory requirements for industrial and municipal dischargers were set, as well as requirements for states to adopt water quality standards.

The Proposed Project would widen an existing segment of Orangewood Avenue to accommodate a new westbound travel lane and related improvements. The roadway improvements would increase impervious surface areas along the affected segment of Orangewood Avenue which could consequently increase the potential for surface runoff. The Project would be subject to conformance with SEIR No. 339 MM 3-2, which requires compliance with NPDES General Construction Permit requirements, including preparation of a SWPPP and incorporation of sediment control BMPs to reduce the potential for offsite and downstream water quality impacts; refer also to Response 3.6 (b) above and SEIR No. 339 MM 3-2 below. Implementation of the SWPPP would reduce potential runoff and pollutants associated with Project construction activities to the maximum extent feasible. Further, grading activities associated with Project construction would be required to demonstrate conformance with *Anaheim Municipal Code* Chapter 17.04, Grading, Excavations, Fills, Watercourses, and the *City of Orange Grading Ordinance (Orange Municipal Code* Chapter 16.40). Following conformance with SEIR No. 339 MM 3-2, as well the *Anaheim Municipal Code* and *Orange Municipal Code* grading requirements, the Project's construction-related impacts to water quality standards would be less than significant, and the level of impact would not increase from that identified in SEIR No. 339. The proposed amendments to the General Plan, Zoning Map and PTMLUP associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development of the area subject to the reorganization would be subject to analysis pursuant to CEQA. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339.

LONG-TERM OPERATIONAL IMPACTS

Although the Proposed Project is not exempt from the requirements of the Orange County Model Water Quality Management Plan (WQMP), the specific structural items, typically included in a WQMP for mitigating the impacts of additional impervious surfaces created by a project, would be constructed as part of the adjacent Orangewood Avenue Improvement Project (SCH #2004121045) located to the west of the Proposed Project. As the Orangewood Avenue Improvement Project would precede the implementation of this Proposed Project, this Proposed Project's additional impervious area would be sufficiently mitigated when its construction begins. Furthermore, the Project proposes improvements to the local drainage system to capture flow from the widened bride and roadway improvements and convey local drainage flow to the Santa Ana River. Specifically, an existing drainage facility located at the eastern portion of the Santa Ana River would be relocated slightly north of the existing location. Roadway widening activities would also install curb, gutter, and storm drain improvements along the affected segment of Orangewood Avenue.



Following implementation of the proposed improvements to the local storm drainage system, stormwater would be collected and treated such that long-term operational impacts to water quality would be less than significant, and the level of impact would not increase from that identified in SEIR No. 339.

To determine the Project's long-term operational impacts to the Santa Ana River, a scour analysis was prepared for the Proposed Project as part of the Basis of Design Report to ensure the design of the bridge structure improvements would account for any potential removal of material along the channel as a result of hydraulic forces; refer to [Appendix D](#). Currently, there are a series of existing grade control structures in the Santa Ana River that currently protect the channel from long-term scour. However, based on the scour analysis, the existing bridge is susceptible to local scour.

The proposed bridge structure improvements would increase the water surface elevation within the limits of the Project resulting in an anticipated depth of total scour of 22.9 feet within the vicinity of the bridge. With implementation of proposed scour countermeasures (e.g., modified bridge footings or placement of a permeable articulated concrete block [ACB] mat), the Project would protect the existing and proposed bridge foundations (i.e., bridge piers and pilings) from scour, improving the existing condition. As such, impacts related to scour would be less than significant in this regard.

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

This impact threshold was modified by the OPR in 2018. The changes to this threshold of significance consist of refinements and clarifications of existing requirements. Although the specific language for this threshold of significance has changed, the analysis was considered in the SEIR No. 339 Appendix A.

Previous Significance Determination: The Initial Study for SEIR No. 339 concluded that impacts concerning substantially interfering with groundwater recharge would be less than significant since the Platinum Triangle is largely developed with urban uses and does not represent a substantial groundwater recharging area. SEIR No. 339 noted that an additional groundwater well would be constructed within the *PTMLUP* area; however, this additional groundwater well would not substantially deplete groundwater supplies based on its location near the Orange County Water District (OCWD) Groundwater Basin. SEIR No. 339 determined that conformance with existing regulatory requirements and standard conditions of approval would ensure the impacts related to groundwater supplies are less than significant.

Project-Specific Analysis:

GROUNDWATER SUPPLIES

During construction, limited water supplies would be required for dust control and maintenance of construction vehicles and equipment. Based on the Projects scope and limited construction duration, it is not anticipated that construction would substantially deplete groundwater supplies. The Project does not propose the installation of landscaped medians or any other Project features which would require public water service during operation. The proposed water line extension is required to enhance the City of Orange's water system and create the redundancy necessary for existing capacity requirements. Thus, the Project would not impact groundwater supplies such that it would impede sustainable groundwater management of the basin, and the level of impact would not increase from that identified in SEIR No. 339. The proposed amendments to the General Plan, Zoning Map and PTMLUP associated



with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development of the area subject to the reorganization would be subject to analysis pursuant to CEQA. However, given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR, one can anticipate that the level of impact to groundwater supplies would not increase from that identified in SEIR No. 339.

GROUNDWATER RECHARGE

As a roadway widening project, long-term operations of the Proposed Project would have the potential to interfere with groundwater recharge due to Orangewood Avenue's increase in impervious surfaces. Although the Proposed Project would increase the amount of impervious surface area analyzed under SEIR No. 339, the Project footprint would involve a segment of Orangewood Avenue which is already largely built-out with impervious surfaces. Nonetheless, the Project would be designed such that it minimizes grading and maintains the roadway's existing drainage pattern to reduce potential impacts on groundwater recharge. The Project would implement design measures and BMPs to ensure that stormwater runoff volumes from the site do not increase from existing conditions; refer to Response 3.9 (a). The proposed amendments to the General Plan, Zoning Map and PTMLUP associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development of the area subject to the reorganization would be subject to analysis pursuant to CEQA. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339. Accordingly, the Project would not impact groundwater recharge such that it would impede sustainable groundwater management of the basin, and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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

This impact threshold was modified by the OPR in 2018. The changes to this threshold of significance consist of refinements and clarifications of existing requirements. Although the specific language for this threshold of significance has changed, the analysis was considered in the SEIR No. 339 Appendix A.

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

Previous Significance Determination: The Initial Study for SEIR No. 339 noted that the runoff rates are expected to remain approximately the same as existing conditions, since *PTMLUP* buildout would not increase the runoff volume within the *PTMLUP* area. The Initial Study concluded that compliance with the design requirements of the City and the OCFCD would ensure that runoff is properly conveyed and discharged as appropriate. Therefore, potential impacts associated with increases in runoff, including potential increased erosion or siltation, would be less than significant. Because these impacts were considered less than significant, they were not further analyzed in SEIR No. 339.

Project-Specific Analysis: Refer to Response 3.10 (a).

Significance Determination: No substantial increase in the level of impact from previous analysis.



2) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

Previous Significance Determination: The Initial Study for SEIR No. 339 concluded that *PTMLUP* buildout would not significantly increase the amount of impervious surface within the Platinum Triangle and that runoff rates would remain approximately the same as existing conditions. The Initial Study determined that the Project would result in less than significant impacts concerning substantially altering the existing drainage pattern of the site or area following compliance with the design requirements of the City and the OCFCD. Because these impacts were considered less than significant, they were not further analyzed in SEIR No. 339.

Project-Specific Analysis: Refer to Response 3.9 (c), above. As described in Section 2.0, Project implementation would realign a segment of the Santa Ana River Trail along the western portion of the Santa Ana River, and reconstruct a segment of the trail along the eastern portion of the River to facilitate installation of new bridge support structures required for the bridge widening. The Proposed Project would not substantially alter the course of the Santa Ana River; the proposed improvements would be designed and constructed to maintain free flow beneath the bridge structure in conformance with OCFCD requirements. The proposed amendments to the General Plan, Zoning Map and *PTMLUP* associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development of the area subject to the reorganization would be subject to analysis pursuant to CEQA. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339. Therefore, impacts associated with the Proposed Project would be less than significant, and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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

Previous Significance Determination: The Initial Study for SEIR No. 339 concluded that impacts to water quality would be less than significant following compliance with the existing regulatory framework (i.e., local grading ordinance, State General Construction Permit, and County area-wide MS4 Storm Water Runoff Permit) would ensure that impacts are reduced to less than significant levels. The Initial Study concluded that impacts concerning runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of pollutant runoff would be less than significant. Because these impacts were considered less than significant, they were not further analyzed in SEIR No. 339.

Project-Specific Analysis: No substantial change from previous analysis. Refer to Responses 3.9 (a) and 3.9 (c) above. The Project would widen approximately a half-mile segment of Orangewood Avenue and thus would result in increased impervious surface area. The Project would demonstrate conformance with the State's General Construction Permit, the *Anaheim Municipal Code* Chapter 17.04 (Grading, Excavations, Fills, Watercourses), and the *City of Orange Grading Ordinance (Orange Municipal Code* Chapter 16.40). Conformance with these measures would ensure Project construction does not result in additional sources of polluted runoff. The Project would include the annexation of land adjacent to the Santa Ana River; however, no new development is proposed within the Santa Ana River reorganization



area as part of this Project. Thus, Project implementation would not create or contribute runoff water which would exceed the existing or planned stormwater drainage systems, and the level of impact would not increase from that identified in SEIR No. 339.

Further, with the implementation of BMPs, and compliance with Federal, State, and local regulations the Project would not substantially degrade water quality. The Project would not result in substantial additional sources of polluted runoff, and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

4) Impede or redirect flood flows?

Previous Significance Determination: Refer to Response 4.10 (c)(2) and 4.10 (c)(3).

Project-Specific Analysis: No substantial change from previous analysis. Refer to Response 4.10 (c)(2) and 4.10 (c)(3).

Significance Determination: No substantial increase in the level of impact from previous analysis.

d) In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

This impact threshold was modified by the OPR in 2018. The changes to this threshold of significance consist of refinements and clarifications of existing requirements. Although the specific language for this threshold of significance has changed, the analysis was considered in the SEIR No. 339 Appendix A.

Previous Significance Determination:

Flood Hazard

The Initial Study for SEIR No. 339 concluded that the *PTMLUP* area is located within a Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Special Flood Hazard Area designated as "Zone A99" and "X." Based on these designations, the Initial Study concluded that *PTMLUP* buildout would involve less than significant impacts concerning potential flooding. Because these impacts were considered less than significant, they were not further analyzed in SEIR No. 339. Nonetheless, SEIR No. 339 includes MM 3-1 to require documentation that any structures must be at least 3 feet higher than the 100-year flood zone.

Tsunami

SEIR No. 339 did not evaluate the potential for *PTMLUP* buildout to be subject to tsunami-related impacts.

Seiche

The *PTMLUP* area does not support surface water bodies capable of causing a seiching event. Therefore, the Initial Study determined that *PTMLUP* buildout would not be subject to seiche-related impacts. Because there were no impacts, they were not further analyzed in SEIR No. 339.



Project-Specific Analysis:

Flood Hazard

Flood hazard areas identified on the FIRM are labeled “Special Flood Hazard Area” (SFHA). FEMA identifies SFHAs as high-risk areas subject to inundation by one-percent-annual chance flood.¹¹ The one-percent annual chance flood is also referred to as the base flood or 100-year flood. Federal floodplain management regulations and mandatory flood insurance purchase requirements apply in these zones. According to FEMA FIRM Panel 142, Map No. 06059C0142J (effective December 3, 2009), the Project Site is located in two FEMA Flood Zones: Flood Zone “X (Other Flood Areas)” and Flood Zone “A.”

Most of the affected roadway segment is located in Flood Zone “X,” which FEMA defines as an area of moderate flood hazard that has between a one percent and 0.2 percent chance of flooding within a given year. This is commonly described as the area subject to flooding between the 100-year/base flood and 500-year flood. FEMA further identifies this area as protected from the one-percent annual chance or greater flood hazard by the Santa Ana River levee system. Thus, roadway improvements occurring within these areas would not place structures within a 100-year flood hazard area and a less than significant impact would occur.

The Orangewood Avenue bridge widening and Santa Ana River Trail improvements are located within Flood Zone “A,” which FEMA defines as areas subject to inundation by the one-percent annual chance flood event. Thus, these improvements would be sited in a 100-year floodplain as designated by FEMA. Although these improvements would be installed within a 100-year floodplain, the bridge support and Santa Ana River trail improvement would be designed such that impacts to the FEMA-designated Flood Zone are minimized and Santa Ana River flow is preserved; refer to Response 3.9 (d) above. These improvements would not reduce the functionality of the Santa Ana River’s existing levee system.

The proposed amendments to the General Plan, Zoning Map and PTMLUP associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development of the area subject to the reorganization would be subject to analysis pursuant to CEQA. Given that the permitted location, type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339. Thus, impacts concerning the placement of structures within a 100-year flood hazard area would be less than significant and the level of impact would not increase from that identified in SEIR No. 339.

No habitable aboveground structures are proposed under the Project and no new development would occur as a result of the Santa Ana River reorganization area; thus, the Project would not 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. Thus, SEIR No. 339 MM 3-1 is not applicable to the Proposed Project. No impact would occur in this regard, and the level of impact would not increase from that identified in SEIR No. 339.

¹¹ Federal Emergency Management Agency Website, *FEMA Zone Definitions*, http://www.floodadvocate.com/fema-zone-definitions/?gclid=CjwKEAjw4vzKBRct9Zmg8f2blgESJADN5fDgTspDzPxBH5dp9mar2pUN_suNf1cjN8Rj8Vko6HTHHxoCzGzw_wcB, Accessed October 4, 2017.



Tsunami

The Project Site is located nearly 12 miles inland of the Pacific Ocean. As a result, the Project is located at a sufficient distance so as not to be subject to tsunami impacts. No impact would occur in this regard.

Seiche

The Project is not located by a large, confined water body capable of causing a seiching event. Thus, there would be no impact associated with exposure of people or structures to seiche, and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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

This impact threshold was modified by the OPR in 2018. The changes to this threshold of significance consist of refinements and clarifications of existing requirements. Although the specific language for this threshold of significance has changed, the analysis was considered in the SEIR No. 339 Appendix A.

Previous Significance Determination: The Initial Study for SEIR No. 339 concluded that impacts to water quality would be less than significant following compliance with the existing regulatory framework (i.e., local grading ordinance, State General Construction Permit, and County area-wide MS4 Storm Water Runoff Permit) would ensure that impacts are reduced to less than significant levels. The Initial Study concluded that impacts concerning runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of pollutant runoff would be less than significant. Because these impacts were considered less than significant, they were not further analyzed in SEIR No. 339.

Project-Specific Analysis: Refer to Responses 3.9 (a) and 3.9 (c) above. The Project would widen approximately a half-mile segment of Orangewood Avenue and thus would result in increased impervious surface area. The Project would demonstrate conformance with the State's General Construction Permit, as well as the *Anaheim Municipal Code* Chapter 17.04 (Grading, Excavations, Fills, Watercourses) and the *City of Orange Grading Ordinance* (*Orange Municipal Code* Chapter 16.40). Conformance with these measures would ensure Project construction does not result in additional sources of polluted runoff. As designed, the Project would not increase peak flow rates leaving the site, and discharge velocities would not be increased when compared to existing conditions. Thus, Project implementation would not create or contribute runoff water which would exceed the existing or planned stormwater drainage systems, and the level of impact would not increase from that identified in SEIR No. 339. The proposed amendments to the General Plan, Zoning Map and PTMLUP associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development of the area subject to the reorganization would be subject to analysis pursuant to CEQA. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339. With the implementation of BMPs, and compliance with Federal, State, and local regulations the Project would not substantially degrade water quality. The Project would not result in substantial additional sources of polluted runoff, and the level of impact would not increase from that identified in SEIR No. 339.



Significance Determination: No substantial increase in the level of impact from previous analysis.

3.10.1 MITIGATION PROGRAM

Mitigation Measures from SEIR No. 332

Refer to the Mitigation Measures from SEIR No. 339 below, which are based on adopted Mitigation Measures from SEIR No. 332.

Mitigation Measures from SEIR No. 339

SEIR No. 339 includes measures to reduce potential impacts associated the development and infrastructure improvements within the Platinum Triangle. The following measure from SEIR No. 339 is applicable to the Proposed Project.¹² Any modifications to the original measure is shown in ~~striketrough~~ for deleted text and new, inserted text is underlined.

MM 3-2 Prior to the initiation of grading activities, for projects greater than one acre, coverage for the project must be obtained by electronically submitting permit registration documents to the State or obtaining coverage via current general construction permit prescribed method by the ~~property owner/developer~~ City pursuant to State and Federal National Pollution Discharge Elimination System (NPDES) requirements. As part of the Notice of Intent, a Surface Water Pollution Prevention Plan (SWPPP) shall be prepared. The ~~property owner/developer~~ City shall also prepare and submit to the Development Services Division of the Public Works Department, a Water Quality Management Plan (WQMP) in accordance with the City's municipal NPDES requirements and Chapter 7 of the Orange County Drainage Area Management Plan. The WQMP must be approved prior to issuance of grading permit. The SWPPP, in conjunction with the WQMP, will describe the structural and nonstructural best management practices (BMPs) that will be implemented during construction (short-term) within the Project Area as well as BMPs for long-term operation of the Project Area that address potential impacts to surface waters.

¹² Mitigation measure numbering corresponds to Platinum Triangle Master Land Use Plan Appendix C, Updated and Modified Mitigation Monitoring Program Number 106C.



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3.11 LAND USE AND PLANNING

<i>Would the project:</i>	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
a. Physically divide an established community?				✓
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				✓

a) Would the project physically divide an established community?

Previous Significance Determination: The Initial Study for SEIR No. 339 concluded that no physical division of an established community would result from implementation of the *PTMLUP* and no mitigation was required. Because there were no impacts, this topic was not further analyzed in SEIR No. 339.

Project-Specific Analysis: The Project Site involves an approximately half-mile long segment of the existing roadway (Orangewood Avenue) generally east of Rampart Street and ending just east of Eckhoff Street, consists of improved roadway right-of-way, pedestrian and bicycle facilities, and infrastructure improvements. The Project is surrounded by channelized portions of the Santa Ana River, and developed areas consisting of SR-57, commercial, and residential land uses.

Project implementation would not divide an established community. Further, the proposed Orangewood Avenue roadway widening is anticipated to improve area circulation opportunities along the affected segment to further advance community connectivity. Additionally, the proposed reorganization of municipal jurisdiction along the Santa Ana River would not result in any development that could physically divide an established community. As such, no impacts concerning the division of an established community would occur, and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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

This impact threshold was modified by the OPR in 2018. The changes to this threshold of significance consist of refinements and clarifications of existing requirements. Although the specific language for this threshold of significance has changed, the analysis was considered in the SEIR No. 339 on page 5.4-5.

Previous Significance Determination: SEIR No. 339 concluded that *PTMLUP* buildout would result in less than significant impacts to City and SCAG land use plans, policies, and regulations following conformance with existing regulatory requirements. However, SEIR No. 339 concluded that the *PTMLUP* would be inconsistent with the *Anaheim General Plan's* Public Services and Facilities Element Goal 8.1, as high-rise residential towers (A-Town Metro project) could potentially interfere with the



Southern California Gas Company's microwave tower's telecommunications function. Impacts in this regard were determined to remain significant and unavoidable, and a Statement of Overriding Considerations was adopted by the City Council when SEIR No. 339 was certified.

Following SEIR No. 339 certification, SEIR No. 339 Addendum No. 4 evaluated the amended A-Town Metro Project which included a Development Agreement amendment, *Anaheim General Plan* amendment, and *PTMLUP* amendment. Addendum 4 found that A-Town Metro Project would be consistent with all applicable goals and policies of the General Plan's Land Use, Economic Development, and Community Design Elements. Additionally, the Addendum 4 concluded that the A-Town Metro included a provision to limit the maximum height of buildings; however, impacts would continue to be significant and unavoidable and no change to the level of significance from that of SEIR No. 339 would occur.

Project-Specific Analysis: As a roadway segment, the Project Site (Orangewood Avenue) does not have a City of Anaheim or City of Orange land use designation. However, in addition to roadway improvements along Orangewood Avenue, the Proposed Project would reorganize land within the Project area through a municipal boundary adjustment within the Project limits to annex land outside of the City limits (currently in the City of Orange) into the City of Anaheim, incorporating properties within the City's sphere of influence and expanding the boundaries of Platinum Triangle; refer to [Exhibit 2-5](#). [Table 2-1](#) shows the existing and proposed land use designations and zoning for the areas proposed for annexation. Refer also to [Exhibits 2-6](#) through [Exhibit 2-9](#) for proposed land use designations and zoning within the reorganizational area, respectively. In addition to LAFCO approval, the changes to the municipal boundaries and proposed land use and zoning in the reorganizational area would require amendments to the General Plan Land Use Element, Zoning Map, and Platinum Triangle Master Land Use Plan; refer to [Exhibit 2-10](#). The proposed amendments to the General Plan, Zoning Map and PTMLUP associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development of the area subject to the reorganization would be subject to analysis pursuant to CEQA. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339.

Area 1A and Area 1

As shown on [Exhibit 2-5](#), Area 1A and Area 1 are located south of Orangewood Avenue and bound by North Net Training Center (2400 Orangewood Avenue) to the west and the Santa Ana River Trail to the east. The proposed reorganization would realign a sliver of the North Net Training Center property to allow the entire parcel to be located within the Anaheim city limits and would continue to provide operational use for the North Net Training Center. The Project proposes to amend the General Plan Land Use Element to change the land use designation for Area 1A and Area 1 from Open Space to Mixed-Use Urban Core (refer to [Exhibits 2-6](#) and [2-7](#)). In addition, the Project would amend the Zoning Map to reclassify Area 1A and Area 1 to the "PR" Public Recreational Zone and Sub Area B of the Orangewood District of the PTMU Overlay Zone. The Project would also amend the PTMLUP to include Area 1A and 1 in Sub Area B of the Orangewood District. The proposed amendments would be consistent with the existing North Net Training Center.

The Mixed-Use Urban Core designation is intended for a mix of uses, including residential, commercial, services, hotel, and professional office uses in a high-quality, pedestrian-friendly environment. The maximum density for the residential component of mixed-use development is up to 100 dwelling units per acre. The maximum floor area ratio for the non-residential component of mixed-use development is 3.00.



The intent of the PTMU Overlay Zone is to provide opportunities for well-designed development projects that combine residential with non-residential uses. Non-residential uses may office, retail, business services, personal services, public spaces and uses, and other community amenities within the portions of the Platinum Triangle designated with the Mixed-Use, Office High, and Office Low designations in the Anaheim General Plan.

The proposed amendments would not increase the maximum permitted development above the 321 dwelling units previously analyzed in the SEIR No. 339 for Sub Area B of the Orangewood District of the PTMU Overlay Zone. In the event the subject properties, including the existing North Net Training Center, are considered for future development, the maximum development intensity of 321 dwelling units would apply to all of Sub Area B. However, this is not anticipated in the near future at this time. As such, the proposed amendments to the General Plan, Zoning Map and PTMLUP for Area 1A and Area 1 would result in a less than significant impact concerning conflicts with an applicable land use plan, policy, or regulation, and the level of impact would not increase from that identified in SEIR No. 339.

Area 2A Stadium Sliver

The proposed reorganization does not include a sliver of the Angel Stadium property (Area 2A) as depicted in [Exhibit 2-5](#). The Local Agency Formation Commission of Orange County (LAFCO) adopted Resolution No. RO 21-04 approving the “Santa Ana River Reorganization – Area 2A” on October 13, 2021. Area 2A continues to provide parking for Angel Stadium and no changes are proposed to Area 2A’s land use designation or zoning, which were amended in 2007 in anticipation of this reorganization with the City of Orange. The *Stadium District Sub-Area A Project Sustainable Communities Environmental Assessment (Development Project No. 2020-00127)*, prepared by LSA and dated July 2020, analyzed development of this property consistent with its General Plan designation and zoning.

Area 2

As shown on [Exhibit 2-5](#), Area 2 is located north of Orangewood Avenue and consists of a regional bike trail and landscaping. The City is currently studying the potential to purchase Area 2 from the OCFCD for the development of a park as part of a future, separate and independent project. A General Plan Amendment and Zoning Map Amendment would be required to change Area 2 land use designation from Open Space to Parks and zoning to the PR Zone; refer to [Exhibits 2-6 through 2-9](#). The Parks designation allows for active and passive recreational uses such as parks, trails, athletic fields, interpretive centers, and golf courses. The Parks land designation permits a maximum floor area ratio of 0.10. The PR zone implements the Parks land use designation. The intent of the PR zone is to establish for the benefit of the health, safety, and general welfare of the citizens of Anaheim and its visitors, a zone to preserve, regulate, and control the orderly use and enjoyment of City-owned properties and facilities and adjacent private property. Properties within the purview of the PR zone include: (a) City-owned properties, whether the same is exclusively occupied by the City or is used by others on the basis of some agreement with or concession by the City; and (b) adjacent private properties, whose uses and development have an impact on the use and enjoyment of City-owned properties and facilities. As such, the proposed amendments would not conflict with an applicable land use plan, policy, or regulation, and the less than significant level of impact would not increase from that identified in SEIR No. 339.



Area 3 and Remaining Area

The General Plan Circulation Element would continue to designate Area 3, Orangewood Avenue, as a Primary Arterial. The General Plan Land Use Element would continue to designate the remaining area north and south of Orangewood Avenue, between the Proposed City Boundary and Areas 1, 1A, 2 and 2A, for Open Space land use. The Open Space land use designation applies to properties intended to remain in natural open space; utility easements that will provide recreational and trail access to Anaheim's residents; heavily landscaped freeway remnant parcels, and land areas surrounding major water features. The Proposed Project would apply the OS Zone to this area. The OS Zone is the implementing Zone for the General Plan Open Space land use designation and permits a maximum floor area ratio of 0.10. Currently, the City of Anaheim Zoning Map does not include this area within any Zone.

Significance Determination: No substantial increase in the level of impact from previous analysis.

3.11.1 MITIGATION PROGRAM

Mitigation Measures from SEIR No. 332

SEIR No. 332 does not include mitigation measures for land use and planning.

Mitigation Measures from SEIR No. 339

SEIR No. 339 mitigation measures are not applicable to the Proposed Project.



3.12 MINERAL RESOURCES

<i>Would the project:</i>	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				✓
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				✓

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

Previous Significance Determination: The Initial Study for SEIR No. 339 concluded that the *PTMLUP* area does not include mineral resources and the *PTMLUP* area; thus, *PTMLUP* implementation would not result in the loss of the availability of mineral resources that would be of regional value. Because there were no impacts, these resources were not further analyzed in SEIR No. 339.

Project-Specific Analysis: The *Anaheim General Plan* Green Element states that parts of East Anaheim, Anaheim Canyon, and the Hill and Canyon Areas are included in Mineral Resources Zone (MRZ) MRZ-2. The *Orange General Plan* Natural Resources Element designates the sand and gravel resources (aggregate) contained in and along the Santa Ana River as mineral resources. The Project’s proposed improvements along the Santa Ana River Trail would occur within an area designated by the *Orange General Plan* as containing mineral resources. However, these improvements would be limited to realigning a small segment of the Santa Ana River Trail and relocating an existing drainage facility located at the eastern portion of the Santa Ana River to accommodate the proposed bridge widening. Five existing bents situated along the River bottom would be lengthened for the widening and scour improvements are proposed to protect the proposed bridge structure. The nature of these improvements would not change the availability of aggregate resources contained in and along the Santa Ana River. The proposed amendments to the General Plan, Zoning Map and *PTMLUP* associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development of the area subject to the reorganization would be subject to analysis pursuant to CEQA. Given that the location and the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339. The City of Orange evaluates development within areas containing aggregates or other deposits which are significant to the regional economy to ensure adequate mitigation or preservation of these areas for future aggregate mining opportunities. Thus, impacts concerning the loss of availability of a known mineral resource that would be of value to the region and the residents of the State would be less than significant, and the level of increase would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.



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

Previous Significance Determination: The Initial Study for SEIR No. 339 concluded that the *PTMLUP* area does not contain any mineral resources and that *PTMLUP* implementation would not result in the loss of the availability of mineral resources that would be of regional value. Because there were no impacts, these resources were not further analyzed in SEIR No. 339.

Project-Specific Analysis: As discussed in Response 3.11 (a), above, the Project would not 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, and the level of increase would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

3.12.1 MITIGATION PROGRAM

Mitigation Measures from SEIR No. 332

SEIR No. 332 does not include mitigation measures for mineral resources.

Mitigation Measures from SEIR No. 339

SEIR No. 332 does not include mitigation measures for mineral resources.



3.13 NOISE

<i>Would the project result in:</i>	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				✓
b. Generation of excessive groundborne vibration or groundborne noise levels?				✓
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				✓

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

This impact threshold was modified by the OPR in 2018. The changes to this threshold of significance consist of refinements and clarifications of existing requirements. Although the specific language for this threshold of significance has changed, the analysis was considered in the SEIR No. 339 page 5.5-19.

Previous Significance Determination: SEIR No. 339 determined that *PTMLUP* implementation could expose persons to, or generate, noise levels in excess of standards established in the *Anaheim General Plan* and *Anaheim Noise Ordinance (Anaheim Municipal Code Chapter 6.70, Sound Pressure Levels)*. Specifically, SEIR No. 339 concluded that *PTMLUP* buildout would result in a significant increase in noise generated by vehicular traffic along Gene Autry Way from I-5 to State College Boulevard and on State College Boulevard from Orangewood Avenue to Gene Autry Drive. SEIR No. 339 also determined that *PTMLUP* buildout would allow for noise-sensitive residential units which may be exposed to mobile and stationary noise levels that exceed State and/or City standards and that building façades that are exposed to noise levels that exceed 69 A-weighted decibels (dBA) would require architectural improvements to achieve the required 45 dBA community noise equivalent level (CNEL) interior noise level limits.

Despite implementation of SEIR No. 339 MMs 5-1 through 5-5 and MM 5-7 through 5-10, impacts concerning exposure to mobile- and stationary-source noise and vibration were determined to remain significant and unavoidable, and a Statement of Overriding Considerations was adopted by the City Council when SEIR No. 339 was certified.

Project-Specific Analysis: It is difficult to specify noise levels that are generally acceptable to everyone; what is annoying to one person may be unnoticed by another. Standards may be based on documented complaints in response to documented noise levels, or based on studies of the ability of people to sleep, talk, or work under various noise conditions; however, all such studies recognize that individual responses vary considerably. Standards usually address the needs of the majority of the general population.



SHORT-TERM CONSTRUCTION IMPACTS

Construction activities generally are temporary and have a short duration, resulting in periodic increases in the ambient noise environment. Construction of the Proposed Project would occur over approximately 12 months and would include demolition, grading, paving, and roadway construction. Groundborne noise and other types of construction-related noise impacts typically occur during the initial site preparation. This phase of construction has the potential to create the highest levels of noise; however, it is generally the shortest of all construction phases. Typical noise levels generated by construction equipment are shown in Table 3.13-1, Maximum Noise Levels Generated by Construction Equipment. Operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be due to random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts).

**Table 3.13-1
 Maximum Noise Levels Generated by Construction Equipment**

Type of Equipment	Acoustical Use Factor	L _{max} at 50 Feet (Dba)
Concrete Saw	20	90
Concrete Mixer Truck	40	79
Backhoe	40	78
Dozer	40	82
Excavator	40	81
Forklift	40	78
Paver	50	77
Roller	20	80
Tractor	40	84
Water Truck	40	80
Grader	40	85
General Industrial Equipment	50	85
Jackhammer	20	89
Note:		
1. Acoustical Use Factor (percent): Estimates the fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition) during a construction operation.		
Source: Federal Highway Administration, Roadway Construction Noise Model (FHWA-HEP-05-054), January 2006.		

The closest sensitive uses in the Project area include a surgical center (Orangewood Surgical Center) located approximately 70 feet to the northeast, and residential uses located approximately 20 feet to the southeast. These sensitive uses may be exposed to elevated noise levels during Project construction. However, as the Project involves the widening of a roadway, construction noise would not be concentrated in one location for extended periods of time, since construction equipment would move in a linear fashion along the Project area. The remainder of the Project Site is surrounded by commercial, institutional, and industrial uses.

Construction noise is regulated by the *Anaheim Municipal Code* and *Orange Municipal Code*. In conformance with *Anaheim Municipal Code*, construction noise sources are exempted from the City's



Noise Ordinance standards between the hours of 7:00 AM and 7:00 PM. Similarly, the *Orange Municipal Code* exempts construction noise sources from the City's Noise Ordinance standards between the hours of 7:00 AM to 8:00 PM on weekdays. The Proposed Project would be subject to compliance with the construction time limitations identified in *Anaheim Municipal Code* Section 6.70.010 and *Orange Municipal Code* Section 8.24.070. Following adherence to the *Municipal Code* construction time regulations as well as implementation of SEIR No. 339 MMs 5-7 through 5-10, short-term construction noise impacts would not result in new or significantly increased impacts as compared to the level identified in SEIR No. 339.

LONG-TERM OPERATIONAL IMPACTS

Project implementation would not introduce a new noise-generating source. As described above, Project implementation would accommodate existing and future traffic levels associated with buildout of the *PTMLUP*. The proposed amendments to the General Plan, Zoning Map and *PTMLUP* associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development of the area subject to the reorganization would be subject to analysis pursuant to CEQA. Given that the location and the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339.

Therefore, long-term noise levels would be consistent with those analyzed as part of SEIR No. 339, as the Project would not generate additional traffic beyond what was analyzed in SEIR No. 339 and its addenda; refer to [Section 3.17](#). Generally, a 3 dBA change in the existing ambient noise level is required to instigate a perceivable/noticeable difference in the ambient noise environment. According to the *Caltrans Technical Noise Supplement to the Traffic Noise Analysis Protocol* (2013), a doubling of traffic on a roadway is required to result in an increase of 3 dB (a barely perceptible increase). The proposed Orangewood Avenue widening would not accommodate a doubling of existing traffic, and thus, would not result in a perceptible increase in traffic noise levels. No new long-term noise impacts would occur as a result of Project operations. Following adherence to SEIR No. 339 MM 5-7 through MM 5-10, long-term noise impacts would not result in new or significantly increased impacts as compared to the level identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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

This impact threshold was modified by the OPR in 2018. The changes to this threshold of significance consist of refinements and clarifications of existing requirements. Although the specific language for this threshold of significance has changed, the analysis was considered in the SEIR No. 339 pages 5.5-29 and 5.5-31.

Previous Significance Determination: SEIR No. 339 concluded that *PTMLUP* implementation had the potential to result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels. Specifically, SEIR No. 339 found that *PTMLUP* construction activities would generate substantial levels of groundborne vibration and groundborne noise in the vicinity of vibration-sensitive land uses and that vibration-sensitive receptors could be exposed to substantial levels of groundborne vibration and groundborne noise in the vicinity of the Amtrak/MetroLink line. Despite implementation of SEIR No. 339 mitigation measures, impacts related to generation of substantial levels



of groundborne vibration and groundborne noise in the vicinity of vibration-sensitive land uses were determined to remain significant and unavoidable, and a Statement of Overriding Considerations was adopted by the City Council when SEIR No. 339 was certified.

Project-Specific Analysis:

SHORT-TERM CONSTRUCTION IMPACTS

Project construction would have the potential to result in varying degrees of temporary groundborne vibration, depending on the specific construction equipment used and the operations involved. Vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. Construction vibration could represent a source of annoyance to the identified sensitive receptors along the affected segment of Orangewood Avenue. Construction activities would occur as close as 100 feet from the Orangewood Surgical Center and 300 feet from the closest sensitive receptors. Based on reference vibration levels analyzed in SEIR No. 339, vibration levels from typical construction equipment would diminish substantially at 100 feet and would not exceed thresholds for structural damage or levels that are strongly perceptible as identified by the Federal Transit Administration (FTA) and Caltrans. Pile driving would occur for the modifications to the bridge structure over the Santa Ana River. However, these activities would occur more than 500 feet from the nearest structure. At this distance, construction vibration levels would diminish below the distinctly perceptible level. As such, short-term construction vibration would not result in new or significantly increased impacts as compared to the level identified in SEIR No. 339. No mitigation would be required.

LONG-TERM OPERATIONAL IMPACTS

As a roadway widening and annexation project, operations would not generate a new source of groundborne vibration. As indicated in [Section 3.17](#), the proposed improvements would not increase vehicular capacity of Orangewood Avenue. Impacts would be less than significant, and long-term operational impacts would not result in new or significantly increased impacts as compared to the level identified in SEIR No. 339.

In addition, the proposed amendments to the General Plan, Zoning Map and PTMLUP associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development of the area subject to the reorganization would be subject to analysis pursuant to CEQA. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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

This impact threshold was modified by the OPR in 2018. The changes to this threshold of significance consist of refinements and clarifications of existing requirements. Although the specific language for this threshold of significance has changed, the analysis was considered in the SEIR No. 339 page 5.5-34.



Previous Significance Determination: As discussed in Section 3.9, *Hazards and Hazardous Materials*, SEIR No. 339 identified three existing locations within the vicinity of the Platinum Triangle that support helicopter takeoffs/landings. SEIR No. 339 also disclosed that future heliports/helipads could be constructed in the Platinum Triangle area atop new high-rise structures for fire and emergency response use. SEIR No. 339 determined that despite the potential for noise-sensitive uses to be placed in proximity to heliports/helipads and areas of helicopter activity, use of these heliports would be infrequent. Therefore, SEIR No. 339 found impacts associated with private airstrip/heliport/helipad noise to be less than significant.

SEIR No. 339 determined that the Platinum Triangle area is not located within an airport land use plan or within two miles of a public airport. The nearest public airports to the Platinum Triangle Area include John Wayne Airport, located approximately eight miles to the south, and Fullerton Municipal Airport, located approximately eight miles to the northwest. Therefore, SEIR No. 339 found that no impacts associated with public airport noise would occur.

Project-Specific Analysis: The western extent of the Project Site is adjacent to two City of Anaheim heliports which could potentially pose helicopter safety hazards: Angels Stadium and the North Net Fire Training Center. In addition, the City of Orange includes three heliports: UC Irvine Medical Center; Children’s Hospital of Orange County; and the SCE Serrano Substation; refer to Response 3.8 (f).

Roadway construction activities would involve temporary impacts to ambient noise. However, based on the degree of changes identified in Section 2.0, Project implementation would not expose people residing or working in the Project area to excessive noise impacts beyond what was already analyzed within SEIR No. 339. Project operations would not introduce a new noise generating source. For this reason, impacts concerning helicopter noise levels would not increase from that identified in SEIR No. 339, and impacts would be less than significant.

The proposed amendments to the General Plan, Zoning Map and PTMLUP associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development of the area subject to the reorganization would be subject to analysis pursuant to CEQA. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339.

As stated above, the Platinum Triangle (including the Project Site) is not located within an airport land use plan or within two miles of a public airport. Therefore, no impacts associated with public airport noise would occur, and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

3.13.1 MITIGATION PROGRAM

Mitigation Measures from SEIR No. 332

Refer to the Mitigation Measures from SEIR No. 339 below, which are based on adopted Mitigation Measures from SEIR No. 332.



Mitigation Measures from SEIR No. 339

SEIR No. 339 includes measures to reduce potential impacts associated the development and infrastructure improvements within the Platinum Triangle. The following measures from SEIR No. 339 are applicable to the Proposed Project.¹³ Any modifications to the original measures are shown in ~~strike through~~ for deleted text and new, inserted text is underlined.

- MM 5-7** Ongoing during grading, demolition, and construction, the ~~property owner/developer~~ City shall be responsible for requiring contractors to implement the following measures to limit construction-related noise:
- Noise generated by construction, shall be limited by the ~~property owner/developer~~ City to 60 dBA along the property boundaries, before 7:00 AM and after 7:00 PM, as governed by Chapter 6.7, Sound Pressure Levels, of the *Anaheim Municipal Code*.
 - Limit the hours of operation of equipment that produces noise levels noticeably above general construction noise levels to the hours of 10:00 AM to 4:00 PM.
 - All internal combustion engines on all of the construction equipment shall be properly outfitted with well-maintained muffler systems.
- MM 5-8** Ongoing during construction activities, the ~~property owner/developer~~ City shall be responsible for requiring project contractors to properly maintain and tune all construction equipment to minimize noise emissions.
- MM 5-9** Ongoing during construction activities, the ~~property owner/developer~~ City shall be responsible for requiring project contractors to locate all stationary noise sources (e.g., generators, compressors, staging areas) as far from occupied noise-sensitive receptors as is feasible.
- MM 5-10** Ongoing during construction activities, material delivery, soil haul trucks, and equipment servicing shall also be restricted to the hours set forth in the ~~City of Anaheim Municipal Code~~, Section 6.70.

¹³ Mitigation measure numbering corresponds to Platinum Triangle Master Land Use Plan Appendix C, Updated and Modified Mitigation Monitoring Program Number 106C.



3.14 POPULATION AND HOUSING

<i>Would the project:</i>	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				✓
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				✓

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

This impact threshold was modified by the OPR in 2018. The changes to this threshold of significance consist of refinements and clarifications of existing requirements. Although the specific language for this threshold of significance has changed, the analysis was considered in the SEIR No. 339 on page 5.6-13.

Previous Significance Determination: SEIR No. 339 concluded that the residential and non-residential development accommodated through *PTMLUP* implementation would directly and indirectly induce population growth. Although *PTMLUP* buildout would result in indirect and direct population growth, the SEIR No. 339 concluded that it would be consistent with SCAG’s regional growth management policies since its implementation would result in a more balanced jobs/housing ratio when compared to existing conditions. No impacts were identified and no mitigation was required.

Project-Specific Analysis: As a roadway improvement and annexation project, the Proposed Project would not directly induce substantial population growth in an area through the introduction of new residential housing or businesses, as neither of these uses would occur with Project implementation. The Project does not involve roadway extensions, and would be limited to the introduction of a new westbound travel lane (and associated improvements) to accommodate existing and anticipated vehicular traffic associated with buildout of the *PTMLUP*. The proposed amendments to the General Plan, Zoning Map and *PTMLUP* associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development of the area subject to the reorganization would be subject to analysis pursuant to CEQA. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339. As such, the Project is not anticipated to induce substantial unplanned population growth in the area, either indirectly or directly. A less than significant impact would occur in this regard, and the level of impact would not increase from that identified in SEIR No. 339.



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

This impact threshold was modified by the OPR in 2018. The changes to this threshold of significance consist of refinements and clarifications of existing requirements. Although the specific language for this threshold of significance has changed, the analysis was considered in the SEIR No. 339 Appendix A.

Previous Significance Determination: The Initial Study for SEIR No. 339 determined that *PTMLUP* implementation would not displace people or residential development. As such, impacts in this regard were not further analyzed in SEIR No 339.

Project-Specific Analysis: No housing units would be displaced as a result of Project implementation. Existing residential land uses are present within the Project vicinity. However, all Project improvements would occur along an existing segment of Orangewood Avenue, OCFCD-managed segments of the Santa Ana River Trail, and Santa Ana River reorganization area, which is currently vacant land. The proposed amendments to the General Plan, Zoning Map and *PTMLUP* associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development of the area subject to the reorganization would be subject to analysis pursuant to CEQA. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339. As such, Project implementation would not displace any existing housing units or people requiring the construction of additional replacement housing units elsewhere and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

3.14.1 MITIGATION PROGRAM

Mitigation Measures from SEIR No. 332

SEIR No. 332 does not include mitigation measures for population and housing.

Mitigation Measures from SEIR No. 339

SEIR No. 339 does not include mitigation measures for population and housing.



3.15 PUBLIC SERVICES

<i>Would the project:</i>	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				✓
1) Fire protection?				✓
2) Police protection?				✓
3) Schools?				✓
4) Parks?				✓
5) Other public facilities?				✓

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

1) Fire Protection?

Previous Significance Determination: SEIR No. 339 determined that Platinum Triangle buildout would necessitate additional fire facilities, delay the AFD’s response time for first engine response, and increase demand for other operational sections of the AFD. To mitigate these impacts to fire protection services, SEIR No. 339 concluded that increases in property tax revenues generated by *PTMLUP* buildout would be used for additional AFD staffing needs. Furthermore, the Public Safety Impact Fee would be collected at the time of issuance of building permits for projects in the Platinum Triangle, providing funds for the construction of new fire facilities. SEIR No. 339 found impacts associated with fire protection facilities to be less than significant with the incorporation of SEIR No. 339 MM 7-1 and MM 7-2.

Project-Specific Analysis: The Proposed Project would not result in the construction of aboveground structures which are at risk to fire and would not directly or indirectly induce significant population growth; refer to Response 3.13 (a). As a roadway widening and annexation project, the Project would not result in the need for additional new or physically altered AFD or City of Orange Fire Department (OFD) fire protection facilities. In fact, Project implementation would result in a long-term benefit to fire protection services, as it would improve traffic flow along Orangewood Avenue through its addition of a new westbound travel lane, thereby improving emergency response times. As a roadway infrastructure and annexation project, SEIR No. 339 MM 7-1 and 7-2 are not applicable to the Proposed Project since the Project does not require fire sprinklers or require the payment of Public Safety Impact Fees. No impacts would occur, and the level of impact would not increase from that identified in SEIR No. 339.



Significance Determination: No substantial increase in the level of impact from previous analysis.

2) Police Protection?

Previous Significance Determination: SEIR No. 339 concluded that *PTMLUP* buildout would require an increase in police facilities and staffing at the Anaheim Police Department (APD). To mitigate these impacts to police protection services, SEIR No. 339 concluded that increases in property tax revenues generated by *PTMLUP* buildout would be used to for additional APD staffing needs. Furthermore, the Public Safety Impact Fee would be collected at the time of issuance of building permits for projects in the Platinum Triangle, providing funds for the construction of new police protection facilities. The SEIR found impacts associated with police protection facilities to be less than significant with the incorporation of SEIR No. 339 MM 7-3 through MM 7-7.

Project-Specific Analysis: The Proposed Project would not directly or indirectly induce significant population growth; refer to Response 3.13 (a) above. As a roadway widening and annexation project, the Project would not result in the need for additional new or physically altered APD or Orange Police Department (OPD) police protection facilities. In fact, Project implementation would result in a long-term benefit to police protection services, as it would improve traffic flow along Orangewood Avenue through its addition of a new westbound travel lane, thereby improving emergency response times. As a roadway infrastructure and annexation project, SEIR No. 339 MM 7-3 through 7-7 are not applicable to the Proposed Project, since the Project does not require safety measures for crime prevention, does not include parking lots or parking structures, and does not require the payment of Public Safety Impact Fees. No impacts would occur, and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

3) Schools?

Previous Significance Determination: SEIR No. 339 concluded that residential development within the Platinum Triangle would generate additional students requiring school services in the Anaheim City School District and Anaheim Union High School District. To mitigate impacts to school services, SEIR No. 339 concluded that developer payment of school fees levied by Anaheim City School District and Anaheim Union High School District would reduce potential school-related impacts to a less than significant level. SEIR No. 339 found impacts associated with schools to be less than significant with the incorporation of SEIR No. 339 MM 7-8 and MM 7-9.

Project-Specific Analysis: As a roadway infrastructure and annexation project, the Proposed Project would not directly or indirectly induce significant population growth; refer to Response 3.13 (a). Thus, the Project would not generate school-aged students that would create a demand on local schools for educational services. As a roadway infrastructure and annexation project, SEIR No. 339 MM 7-8 and 7-9 are not applicable to the Proposed Project since the Project would not impact the school districts. No impacts would occur, and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

4) Parks?

Previous Significance Determination: SEIR No. 339 concluded that *PTMLUP* buildout would generate additional residents which would increase local demand for parks and recreational facilities and could



exacerbate existing overuse of parks in the City. However, the SEIR concluded that compliance with *Anaheim Municipal Code* Section 18.20.110.010, which establishes requirements for recreational space within the PTMU Overlay Zone, would ensure that recreational space would increase proportional to population growth in the Platinum Triangle. SEIR No. 339 concluded that impacts associated with parks and recreational facilities would be less than significant following conformance with existing applicable regulations and SEIR No. 339 MM 8-1 through MM 8-3.

Project-Specific Analysis: Refer the responses above. As a roadway widening and annexation project, no new residents would be generated that would impact or create a need for additional local parks or other public facilities. Further, the Project would not increase the capacity of the road such that an indirect population growth would result. SEIR No. 339 MM 8-1 through MM 8-3 are not applicable to the Proposed Project because the Project would not negatively affect parks or recreational facilities. No impact would occur in this regard, and the level of impact would not increase from that identified in SEIR No. 339. In fact, the Project would amend the General Plan, Zoning Map and PTMLUP to designate additional land within the Platinum Triangle for future Park use. The future development of a Park use would be subject to analysis pursuant to CEQA. However, given that development of the area proposed for Park use would be similar in intensity to its current designation as Open Space, one can anticipate that the level of impact would not increase significant from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

5) Other public facilities?

Previous Significance Determination: SEIR No. 339 determined that *PTMLUP* buildout would generate additional residents which would increase demands for other public facilities in the area, including libraries. SEIR No. 339 found impacts associated with public facilities such as libraries to be less than significant with incorporation of SEIR No. 339 MM 7-10, which requires payment of development impact fees which would pay for additional library materials and services needed to serve the *PTMLUP* area.

Project-Specific Analysis: Refer to the responses above. As a roadway widening and annexation project, no new residents would be generated that would impact or create a need for other public facilities, such as libraries. Further, the Project would not increase the capacity of the road such that an indirect population growth would result. SEIR No. 339 MM 7-10 is not applicable to the Proposed Project because the Project would not affect library services. No impact would occur in this regard, and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

3.15.1 MITIGATION PROGRAM

Mitigation Measures from SEIR No. 332

SEIR No. 332 does not include mitigation measures for public services.

Mitigation Measures from SEIR No. 339

SEIR No. 339 mitigation measures are not applicable to the Proposed Project.



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3.16 RECREATION

<i>Would the project:</i>	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				✓
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				✓

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

Previous Significance Determination: SEIR No. 339 determined that *PTMLUP* buildout would generate additional residents which would increase local demand for parks and other recreational amenities and could exacerbate existing overuse of parks in the City. However, SEIR No. 339 concluded that compliance with *Anaheim Municipal Code* Section 18.20.110.010, which establishes requirements for recreational space within the PTMU Overlay Zone, would ensure that recreational space would increase proportional to population growth in the Platinum Triangle. SEIR No. 339 determined that *PTMLUP* buildout would result in less than significant impacts to parks and recreational facilities following compliance with applicable regulations and the incorporation of SEIR No. 339 MM 8-1 through MM 8-3.

Project-Specific Analysis: Refer to Response 3.15 (a)(4). As a roadway widening and annexation project, Project implementation would not involve substantial population growth or increased demand for or use of existing neighborhood or regional parks or other recreational facilities. The Project does not propose the construction or expansion of recreational facilities. SEIR No. 339 MM 8-1 through MM 8-3 are not applicable to the Proposed Project because the Project would not negatively affect parks or recreational facilities. No impacts concerning parks and recreational facilities would occur in this regard, and the level of impact would not increase from that identified in SEIR No. 339. In fact, the Project would amend the General Plan, Zoning Map and *PTMLUP* to designate additional land within the Platinum Triangle for future Park use. The future development of a park would be subject to analysis pursuant to CEQA. However, given that development of the area proposed for Park use would be similar in intensity to its current designation as Open Space, one can anticipate that the level of impact would not increase significant from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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?



Previous Significance Determination: SEIR No. 339 determined that *PTMLUP* buildout would generate additional residents which would increase local demand for parks and other recreational amenities and could exacerbate existing overuse of parks in the City. However, the SEIR concluded that compliance with *Anaheim Municipal Code* Section 18.20.110.010, which establishes requirements for recreational space within the PTMU Overlay Zone, would ensure that recreational space would increase proportional to population growth in the Platinum Triangle. SEIR No. 339 determined that *PTMLUP* buildout would result in less than significant impacts to parks and recreational facilities following compliance with applicable regulations and incorporation of SEIR No. 339 MM 8-1 through MM 8-3.

Project-Specific Analysis: Refer to Response 3.15 (a). The Proposed Project would include the construction of a bicycle lane along the widened Orangewood Avenue and realignment of the Santa Ana River Trail. Additionally, the Proposed Project would install new retaining walls under the Orangewood Avenue bridge structure to maintain the existing trail. The Project would also include the annexation of land near the Santa Ana River; however, no new development is proposed within the Santa Ana River reorganization area as part of this Project. The Proposed Project's potential environmental impacts associated with the construction of the abovementioned recreational facilities are analyzed in this Addendum. Construction of the bicycle lane and the proposed trail improvements would be subject to compliance with all applicable local, State, and Federal laws, ordinances, and regulations, as well as the specific mitigation measures applicable to the Proposed Project identified within this Addendum. Compliance with the relevant laws, ordinances, and regulations, as well as the specified mitigation measures, would ensure the potential impacts associated with the proposed recreational facilities improvements are considered less than significant. Overall, the addition of bike lane would result in beneficial impacts in regard to recreational opportunities and connectivity in the region. As such, physical effects on the environments as a result of the Proposed Project would be less than significant and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

3.16.1 MITIGATION PROGRAM

Mitigation Measures from SEIR No. 332

SEIR No. 332 mitigation measures are not applicable to the Proposed Project.

Mitigation Measures from SEIR No. 339

SEIR No. 339 mitigation measures are not applicable to the Proposed Project.



3.17 TRANSPORTATION

<i>Would the project:</i>	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?				✓
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?				✓
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				✓
d. Result in inadequate emergency access?				✓

As discussed in [Section 3.0](#), Project implementation would widen Orangewood Avenue from a five-lane roadway to a six-lane divided facility to provide expanded vehicle, bicycle, and pedestrian access, and annexation of land near the Santa Ana River; refer to [Exhibit 2-3](#). The Project would incorporate an additional westbound through lane through the Project Site boundaries to ensure acceptable operations through the Project area and accommodate the *PTMLUP*'s proposed land use intensities. Project implementation would improve queuing along Orangewood Avenue; however, the proposed additional westbound through lane would not increase roadway capacity along the affected segment.

Orangewood Avenue is a west-east roadway with two travel lanes in each direction. The posted speed limit along the affected roadway segment is 40 miles per hour. The *Anaheim General Plan* Circulation Element identifies the roadway as a Primary Arterial and the *Orange General Plan* Circulation and Mobility Element identifies the roadway as a Primary Arterial west of Eckhoff Street and a Major Arterial east of Eckhoff Street. The *Orange General Plan* and *Anaheim General Plan* designate the cross section for a Primary Arterial as a four-lane divided roadway with 115 feet of right-of-way and the *Orange General Plan* designates the cross section for a Major Arterial as a six-lane divided roadway.

The proposed amendments to the General Plan, Zoning Map and *PTMLUP* associated with the Santa Ana River reorganization portion of the Project reflect anticipated future development of these areas, but not a specific development project. Any future development of the area subject to the reorganization would be subject to analysis pursuant to CEQA. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339.

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

This impact threshold was modified by the OPR in 2018. The changes to this threshold of significance consist of refinements and clarifications of existing requirements. Although the specific language for this threshold of significance has changed, the analysis was considered in the SEIR No. 339 on page 5.9-39. SEIR No. 339 concluded that *PTMLUP* build-out of would increase traffic volumes on Caltrans facilities and thus would conflict with an applicable congestion management program.



Previous Significance Determination: SEIR No. 339 concluded that *PTMLUP* build-out would increase traffic volumes on Caltrans facilities and thus would conflict with an applicable congestion management program. SEIR No. 339 also concluded that *PTMLUP* buildout would impact the level of service for the area roadway system and therefore would conflict with an applicable plan, ordinance, or policy establishing the effectiveness for the performance of the circulation system. Despite incorporation of SEIR No. 339 MM 9-1 through MM 9-15, impacts related to the level of service for the area roadway system and increased traffic volumes on Caltrans facilities were determined to remain significant and unavoidable, and a Statement of Overriding Considerations was adopted by the City Council when SEIR No. 339 was certified.

Project-Specific Analysis:

LOCAL LEVEL OF SERVICE CONSISTENCY

The objective of the Proposed Project is to accommodate existing and predicted traffic flows associated with *PTMLUP* buildout by widening Orangewood Avenue from a five-lane facility to six lanes generally from the Santa Ana River to just east of SR-57 at the SR-57/Orangewood Avenue interchange. Although the Project would be designed to accommodate additional traffic volumes, the proposed improvements would not directly generate new traffic or increase the number of vehicles along the roadway. Additionally, as the Project would improve intersection level of service and reduce queueing, the Project would not conflict with (i.e. lower) an established measure of effectiveness for performance of the system (i.e. level of service). Instead, Project implementation would improve conditions along the roadway, allowing for improved traffic flows and circulation. As a roadway widening Project, SEIR No. 339 MM 9-1 through MM 9-15 are not applicable to the Proposed Project because the Project implementation would not result in traffic impacts.

The proposed amendments to the General Plan, Zoning Map and *PTMLUP* associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development of the area subject to the reorganization would be subject to analysis pursuant to CEQA. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339.

For the reasons above, the Project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the affected circulation system and the level of impacts would not increase from that identified in SEIR No. 339.

REGIONAL CMP CONSISTENCY

Orange County Transportation Agency (OCTA) is charged with adopting the *Orange County Congestion Management Plan* (CMP). In the City of Anaheim, CMP facilities include Harbor Boulevard, State College Boulevard, Katella Avenue, Tustin Avenue, Orangethorpe Avenue, Beach Boulevard, Imperial Highway, as they intersect with I-5, SR-57, and SR-91. In the City of Orange, the only CMP facilities include the SR-55 northbound and southbound ramps at Katella Avenue.¹⁴

¹⁴ Orange County Transportation Authority, *2015 Orange County Congestion Management Program*, Figure 4: CMP Level of Service Chart, November 2015.



The Proposed Project would affect an approximately half-mile long segment of Orangewood Avenue, which is not designated as a CMP facility by the OCTA. The Project would widen a segment of Orangewood Avenue to accommodate existing and predicted traffic associated with *PTMLUP* buildout. Therefore, the proposed improvements would further the long-term transportation needs identified by SEIR No. 339 to ensure transportation infrastructure can adequately meet the demands associated with *PTMLUP* buildout. As discussed, SEIR No. 339 MM 9-1 through MM 9-15 are not applicable to the Proposed Project because the Project implementation would not result in traffic impacts. The Project would not conflict with an applicable congestion management program, and the level of impact would not increase from that identified in SEIR No. 339.

The proposed amendments to the General Plan, Zoning Map and *PTMLUP* associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development of the area subject to the reorganization would be subject to analysis pursuant to CEQA. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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

In September 2013, the Governor’s Office of Planning and Research (OPR) signed SB 743 into law, starting a process that fundamentally changes the way transportation impact analysis is conducted under CEQA. These changes include the elimination of auto delay, LOS, and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts. The guidance identifies Vehicle Miles Travelled (VMT) as the most appropriate CEQA transportation metric, along with the elimination of auto delay and LOS for CEQA purposes. The justification for this paradigm shift is that auto delay/LOS impacts lead to improvements that increase roadway capacity and therefore induce more traffic and greenhouse gas emissions.

The previously certified SEIR No. 339 did not evaluate VMT as it was not required in the CEQA Guidelines at the time SEIR No. 339 was prepared.

On October 26, 2010, the City of Anaheim certified the SEIR No. 339 that analyzed the potential impacts associated with development of the revised Platinum Triangle Expansion Project. Although this previous environmental document did not include a VMT analysis, a supplemental environmental analysis of VMT impacts cannot be required absent new information on that front. The implementation of project design features and mitigation measures related to vehicle emissions have typically been incorporated into air quality and greenhouse gas emissions analyses. Thus, the effect of increased VMT could have been raised in 2010 when the City considered the EIR. A challenge to an EIR must be brought within 30 days of the lead agency’s notice of approval. (Pub. Resources Code, § 21167[b].) Under Public Resources Code Section 21166(c), an agency may not require a supplemental environmental review unless new information, which was not known and could not have been known at the time the EIR was approved, becomes available. After a project has been subjected to environmental review, the statutory presumption flips in favor of the project proponent and against further review. (*Moss v. County of Humboldt* [2008] 162 Cal.App.4th 1041, 1049-1050.) “[S]ection 21166 comes into play precisely because in-depth review has already occurred [and] the time for challenging the sufficiency of the original EIR has long since expired.” (Id., 1050.) There is no competent evidence of new information of severe impact,



and thus the City may rely on an addendum. Accordingly, the City finds that VMT is not “new information” under Public Resources Code Section 21166.

Previous Significance Determination: SEIR No. 339 concluded that although *PTMLUP* buildout could result in an increase in vehicle miles traveled (VMT) and trips in the local area, the *PTMLUP* would benefit to the Southern California Association Government (SCAG) region as it would allow for housing opportunities closer to employment centers. SEIR No. 339 determined that the *PTMLUP* would therefore be consistent with SCAG’s strategies to reduce VMT in the SCAG region and would be consistent with Southern California Air Quality Management District’s *2007 Air Quality Management Plan (2007 AQMP)*, which was the applicable air quality plan at the time. Impacts concerning conflicting with or obstructing implementation of the SCAQMD’s 2007 AQMP were identified as less than significant, and no mitigation was identified.

SEIR No. 339 also concluded that *PTMLUP* buildout had the potential to generate greenhouse gas (GHG) emissions, either directly or indirectly (including VMT consideration), that may have a significant impact on the environment. Specifically, SEIR No. 339 found that the project evaluated in the SEIR would generate substantially more GHG emissions compared to the adopted *PTMLUP* and would cumulatively contribute to climate change impacts in California. Mitigation measures from several environmental sections of SEIR No. 339 were identified to reduce GHG emissions, including: MM 2-3, MM 2-5, MM 2-6, MM 9-1, MM 9-2, MM 9-12, MM 9-14, MM 10-7, MM 10-9, MM 10-12, MM 10-13, MM 10-14, MM 10-18, MM 10-19, MM 10-20, MM 10-21, MM 10-22, and MM 10-24. Despite implementation of the abovementioned mitigation measures, impacts related to GHG emissions were determined to remain significant and unavoidable, and a Statement of Overriding Considerations was adopted by the City Council when SEIR No. 339 was certified.

Project-Specific Analysis: As discussed above, SEIR No. 339 did not address VMT as it was not required in the CEQA Guidelines at the time SEIR No. 339 was prepared. Construction of the Proposed Project would widen the existing bridge structure to increase traffic flow through the Project area and increase efficiency through the intersections. The proposed roadway widening would accommodate existing and predicted traffic demands in compliance with SEIR No. 339 MM 2-5 and would not directly generate new traffic or increase the numbers of vehicles along the roadway. Further, it is acknowledged that OPR has adopted VMT screening criteria to determine if a project requires a detailed VMT analysis pursuant to the *Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory)*, dated April 16, 2018. Per the Technical Advisory, projects that would not likely lead to a substantial or measurable increase in vehicle travel, and therefore generally should not require an induced travel analysis, include:

- Rehabilitation, maintenance, replacement and repair projects designed to improve the condition of existing transportation assets (e.g., highways, roadways, bridges, culverts, tunnels, transit systems, and assets that serve bicycle and pedestrian facilities) and that do not add additional motor vehicle capacity.

As the Proposed Project is replacing the existing bridge structure, improving transportation assets (including bicycle and pedestrian facilities), and would not add additional motor vehicle capacity beyond what was considered in SEIR No. 339, a VMT analysis would not be required. The proposed amendments to the General Plan, Zoning Map and *PTMLUP* associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development of the area subject to the reorganization would be subject to analysis pursuant to CEQA. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the Project would not generate additional VMT beyond



SEIR No. 339 conditions and would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). No impact would occur in this regard.

Significance Determination: No increase in significant impacts has resulted.

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

This impact threshold was modified by the OPR in 2018. The changes to this threshold of significance consist of refinements and clarifications of existing requirements. Although the specific language for this threshold of significance has changed, the analysis was considered in the SEIR No. 339 page 5.9-105.

Previous Significance Determination: SEIR No. 339 concluded that *PTMLUP* implementation would not create sharp curves, dangerous intersections, or any other inherently hazardous design features. SEIR No. 339 determined in accordance with MMP No. 106C, the property owner/developer would dedicate, including necessary construction easements, the ultimate arterial highway rights-of-way as shown in the Circulation Element of the *Anaheim General Plan* adjacent to their property to maintain adequate levels of service and access with the Platinum Triangle. Impacts associated with hazardous geometric design features or incompatible land uses were considered less than significant with incorporation of SEIR No. 339 MM 9-16 and MM 9-17.

Project-Specific Analysis: Refer to Response 3.16 (a). The Project would widen an existing linear segment of Orangewood Avenue that does not presently include sharp curves. In addition, the proposed roadway improvements would not introduce a hazardous design feature such as sharp curves or dangerous intersections. Project implementation is intended to support existing and predicted traffic levels associated with buildout of the *PTMLUP*, and would improve intersection LOS and reduce queueing to improve safety on the roadway. As discussed under Response 3.16 (a), SEIR No. 339 MM 9-16 and MM 9-17 are not applicable to the Proposed Project. Thus, Project implementation would not substantially increase hazards due to a geometric design feature or incompatible use and the level of impact would not increase from that identified in SEIR No. 339.

The land uses associated with the annexation of land in the Santa Ana River area would be compatible with the existing land uses in the Project vicinity. The proposed amendments to the General Plan, Zoning Map and *PTMLUP* associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development of the area subject to the reorganization would be subject to analysis pursuant to CEQA. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

d) Would the project result in inadequate emergency access?

Previous Significance Determination: SEIR No. 339 concluded that the *PTMLUP's* proposed roadway system is designed to accommodate the increased traffic volumes and each development project is required to provide appropriate fire and emergency access, as approved by the AFD. All vehicle access would be designed and improved in accordance with the requirements of the City Engineer. Impacts concerning emergency access were determined to be less than significant.



Project-Specific Analysis: Refer to Responses 3.16 (a) and 3.16 (b). The Project would include improvements along an approximately half-mile segment of Orangewood Avenue. Temporary lane closures, if any, could have the potential to impact emergency vehicle access to adjacent properties due to temporary lane closures. However, Project implementation would contribute to enhanced emergency access along Orangewood Avenue by improving existing traffic conditions and accommodating future traffic generated from PTLUMP buildout. Pursuant to *Orange Municipal Code* Section 12.64, Encroachments in the Public Rights-of-Way, all improvements occurring within Orange right-of-way would require an encroachment permit issued by the Director of Public Works. All improvements occurring within City of Anaheim right-of-way would require preparation of a Right-of-Way Construction Application for approval by the Director of Public Works. As Project construction would obtain all necessary permits from each respective jurisdiction, the Project's construction and operational impacts concerning emergency access would be less than significant, and the level of impact would not increase from that identified in SEIR No. 339.

The land uses associated with the annexation of land in the Santa Ana River area would be compatible with the existing land uses in the Project vicinity. The proposed amendments to the General Plan, Zoning Map and PTMLUP associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development of the area subject to the reorganization would be subject to analysis pursuant to CEQA. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

3.17.1 MITIGATION PROGRAM

Mitigation Measures from SEIR No. 332

SEIR No. 332 mitigation measures are not applicable to the Proposed Project.

Mitigation Measures from SEIR No. 339

SEIR No. 339 mitigation measures are not applicable to the Proposed Project.



3.18 TRIBAL CULTURAL RESOURCES

<i>Would the project:</i>	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				✓
1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or				✓
2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				✓

In 2004, the Governor of California signed into law Senate Bill 18 (SB18) which requires that, prior to the adoption or amendment of a city or county’s general plan, the city or county conduct consultations with California Native American tribes for the purpose of preserving specified places, features, and objects that are located within the city or county’s jurisdiction. SB 18 refers to PRC 5097.9 and 5097.995 (remunerated to PRC 5097.993), which defines a cultural place as:

- Any Native American Sanctified Cemetery, place of worship, religious or ceremonial site or sacred shrine located on public property.
- Native American historic, cultural, or sacred site, that is listed or may be eligible for listing in the California Register of Historic Resources pursuant to Section 5024.1, including any historic or prehistoric ruins, any burial ground, and any archaeological or historic site.

SB 18’s intent is to facilitate meaningful consultation between tribal governments and local governments at the earliest point of the planning and application process. The Native American Heritage Commission (NAHC) maintains a list of California Native American Tribes and pursuant to Government Code Section 65352.3, prior to the adoption or any amendment of a city’s or county’s general plan, proposed on or after March 1, 2005, the city or county shall conduct consultations with California Native American tribes that are on NAHC’s contact list. From the date of city or county who contacts the California Native American tribe, the tribe has 90 days to request a consultation, unless that tribe has agreed to a shorter timeframe. Additionally, pursuant to Government Code Section 65040.02, the city or county shall protect the confidentiality of information concerning the specific identify, location, character and use of those places, features, and objects.



The City of Anaheim recognizes the requirements of SB 18 and the purpose of preserving, mitigating impacts and identifying cultural places located on the project site and in relation to General Plan Amendments associated with the proposed project. Implementation of these requirements is described below.

In 2014, the governor of California approved AB 52, which expanded CEQA by establishing a formal consultation process for California tribes within the CEQA process. The bill specifies that any project may affect or cause a substantial adverse change in the significance of a tribal cultural resource would require a lead agency to “begin consultation with a California Native American tribe that is traditional and culturally affiliated with the geographic area of the Proposed Project.” Section 21074 of AB 52 also defines a new category of resources under CEQA called “tribal cultural resources.” Tribal cultural resources are defined as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe” and is either listed on or eligible for the California Register of Historical Resources or a local historic register, or if the lead agency chooses to treat the resource as a tribal cultural resource.

AB 52 specific that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource, as defined, is a project that may have a significant effect on the environment. The bill requires a lead agency to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project, if the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area and the tribe requests consultation, prior to determining whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. These requirements apply to projects that have a notice of preparation or a notice of negative declaration filed or mitigated negative declaration on or after July 1, 2015. Thus, since this is an addendum to a previously-certified EIR, AB 52 does not apply to this Project.

On Tuesday, May 25, 2021, the City submitted and initiated a Tribal Consultation List request for a list of California Native American tribes’ contacts and a Sacred Lands File (SLF) search from the NAHC. On Thursday, June 10, 2021, the NAHC responded to the City’s request and returned a populated Tribal Consultation List with California Native American Tribes’ contact information for tribes that have traditional lands or cultural places within the boundaries of the county (Orange County), which the project site is located within. Additionally, NAHC returned results for the SLF and the results came back negative. The City wrote SB 18 notification letters to all of the tribes listed on the Tribal Consultation List that NAHC provided. The letters explain the proposed project, which includes General Plan amendments as part of this City initiated action. On Tuesday, June 15, 2021, the City emailed and certified mailed physical copies of these letters to the tribes on the Tribal Consultation List. Refer to [Appendix E, *SB 18 Consultation Memorandum*](#).

To date, only two tribes have responded to the City’s SB 18 notification letters. The City also took effort to facilitate consultation efforts, to ensure and confirm if any tribes contacted wanted to proceed with consultation or defer not to have consultation. The City sent out follow up emails asking the tribes to provide confirmation of consultation interest or deferral on Wednesday, July 21, 2021 and on Tuesday, August 10, 2021. As mentioned previously, only two tribes responded to the City’s SB 18 notification letters.

- Gabrieleno Band of Mission Indians – Kizh Nation (Kizh Nation): On Wednesday, June 16, 2021, Kizh Nation responded to the City’s SB 18 notification via email, asking for clarifications behind the proposed project’s activities. Upon the City clarifying details for Kizh Nation, they decided that



there would be no need for consultation and communicated that via email on Tuesday, June 22, 2021.

- Pala Band of Mission Indians (Pala Band): On Wednesday, June 21, 2021, Pala Band responded to the City's July 21, 2021 SB 18 follow up email, with an attached letter stating, in summation – that they would be not requesting consultation.

No other tribe has contacted the City since the latest August 10, 2021 follow up email.

The 90 day window for consultation request closed on September 14, 2021.

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

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

Previous Significance Determination: At the time of the release of the Notice of Preparation for SEIR No. 339, Appendix G of the *CEQA Guidelines* did not include environmental issues regarding potential impacts to Native American-related historical resources. As discussed in Response 3.5 (a), the Initial Study for SEIR No. 339 concluded that the Platinum Triangle does not contain any historical resources as defined by *CEQA Guidelines* Section 15064.5. The Platinum Triangle is not located within the Anaheim Colony Historic District and none of the structures within the *PTMLUP* area were identified on the Qualified Historic Structures list of the *Anaheim Colony Historic District Preservation Plan*. No known historic archaeological sites within the *PTMLUP* were identified. The Initial Study concluded that no impacts would occur and no mitigation was necessary. Because there were no impacts, these resources were not further analyzed in SEIR No. 339.

Project-Specific Analysis: As discussed above, SEIR No. 339 did not address tribal cultural resources. However, according to FSEIR No. 332, the *PTMLUP* does not have any historical resources as defined in *CEQA Guidelines* Section 15064.5. Also, there are no historic archaeological sites located within the *PTMLUP* and the potential for any subsurface cultural resources is considered remote. According to *Orange General Plan EIR* Figure 5.5-1 (Designated Historic Resources) and Section 5.4, *Cultural Resources*, of the *Anaheim General Plan EIR*, no historical or archaeological resources have been identified in the Project vicinity. As the Project involves a fully-improved segment of Orangewood Avenue, a disturbed area near the Santa Ana River (associated with the annexation of land adjacent to the Santa Ana River), as well as a channelized portion of the Santa Ana River, the Project's impacts concerning Native American-related historical resources would be less than significant, and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.



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

Previous Significance Determination: At the time of the release of the Notice of Preparation for SEIR No. 339, *CEQA Guidelines* Appendix G did not include environmental issues regarding potential impacts to tribal cultural resources. Therefore, tribal cultural resources were not evaluated in SEIR No. 339.

Project-Specific Analysis: As discussed above, the Project is not subject to AB 52 and did not undergo the AB 52 consultation process. Nonetheless, no Native American historical or archaeological resources were identified within the Project vicinity as part of SEIR No. 339 and no new impacts have been identified since certification of SEIR No. 339. As the Project involves a fully-improved segment of Orangewood Avenue, a disturbed area near the Santa Ana River (associated with the annexation of land adjacent to the Santa Ana River), as well as a channelized portion of the Santa Ana River, the Project's impacts concerning Native American-resources would be less than significant, and the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

3.18.1 MITIGATION PROGRAM

Mitigation Measures from SEIR No. 332

At the time of the release of the Notice of Preparation for SEIR No. 332, *CEQA Guidelines* Appendix G did not include environmental issues regarding tribal cultural resources. Therefore, tribal cultural resources were not evaluated in SEIR No. 332. No impacts would occur and no mitigation is required.

Mitigation Measures from SEIR No. 339

At the time of the release of the Notice of Preparation for SEIR No. 339, *CEQA Guidelines* Appendix G did not include environmental issues regarding tribal cultural resources. Therefore, tribal cultural resources were not evaluated in SEIR No. 339. No impacts would occur and no mitigation is required.



3.19 UTILITIES AND SERVICE SYSTEMS

<i>Would the project:</i>	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?				✓
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?				✓
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				✓
d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?				✓
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				✓

The SEIR No. 339 identified the following utility agencies that provide service within the *PTMLUP* area.

- Wastewater Treatment and Collection (Anaheim Public Utilities Department);
- Water Supply and Distribution Systems (Anaheim Public Utilities Department);
- Solid Waste (Republic Waste Services of Southern California, LLC);
- Electricity (Anaheim Public Utilities Department);
- Natural Gas (Southern California Gas Company); and
- Communications (Time Warner and AT&T).

a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

This impact threshold was modified by the OPR in 2018. The changes to this threshold of significance consist of refinements and clarifications of existing requirements. Although the specific language for this threshold of significance has changed, the analysis was considered in the SEIR No. 339 on pages 5.10-22, 5.10-27, 5.10-33, 5.10-34, and 5.10-36 of SEIR No. 339.



Previous Significance Determination:

WATER FACILITIES

SEIR No. 339 determined that buildout of the *PTMLUP* would require the addition of new water facilities. The SEIR determined that compliance with Rule 15-D would ensure that adequate water facilities are provided to serve the *PTMLUP*. SEIR No. 339 found impacts associated with new or expanded water facilities to be less than significant with incorporation of SEIR No. 339 MMs 10-1 through 10-16.

WASTEWATER TREATMENT FACILITIES

SEIR No. 339 determined that buildout of the *PTMLUP* would require sewer improvements. With implementation of improvements, the sewer system, including sewer treatment, was anticipated to accommodate development within the *PTMLUP* area based on future buildout conditions. SEIR No. 339 found impacts associated with new or expanded wastewater treatment facilities to be less than significant with incorporation of SEIR No. 339 MMs 10-1 through 10-16.

STORMWATER DRAINAGE FACILITIES

SEIR No. 339 noted that the Master Plan of Storm Drainage for East Garden Grove Wintersburg Channel Tributary Area identified that the existing storm drainage system was deficient under the existing conditions in the *PTMLUP* area at the time the SEIR was prepared. SEIR No. 339 concluded that construction of storm drain facilities would occur in compliance with the standard engineering rules and regulations and would not result in a significant environmental effect. Impacts associated with stormwater drainage facilities were determined to be less than significant with incorporation of SEIR No. 339 MM 10-17.

DRY UTILITIES

According to SEIR No. 339, the *PTMLUP* area receives electricity, natural gas, and telecommunication services from APUD, Southern California Gas Company (SoCal Gas), and Time Warner and AT&T, respectively. SEIR No. 339 determined that project implementation would require the construction of electricity, natural gas, and telecommunication facilities. Impacts associated with dry utilities were determined to be less than significant with incorporation of SEIR No. 332 MM 10-21 through 10-24 and SERI No. 339 MM 10-25 through 10-27.

Project-Specific Analysis:

WATER FACILITIES

Due to the nature of the Project (roadway widening and annexation of land adjacent to the Santa Ana River), Project implementation would not require or result in the construction of new water facilities or expansion of existing facilities. The Project does not propose landscaped medians or any other component which would require water connections. The Project would install a water line connection within Orangewood Avenue to enhance the City of Orange's existing water system. The proposed water line connection would provide redundancy should failure arise in other areas of the system and would not involve a capacity increase which would require or result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause an environmental effect. No impact would occur in this regard, and the level of impact would not increase from that identified in SEIR No. 339.



WASTEWATER TREATMENT FACILITIES

Due to the nature of the Project (roadway widening and annexation of land adjacent to the Santa Ana River), Project implementation would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities. No impact would occur in this regard, and the level of impact would not increase from that identified in SEIR No. 339.

STORMWATER DRAINAGE FACILITIES

To accommodate widening of the Orangewood Avenue bridge crossing, an existing drainage facility located at the eastern portion of the Santa Ana River would need to be relocated slightly north of the existing location. Roadway widening activities would also install curb, gutter, and storm drain improvements along the affected segment of Orangewood Avenue. Excluding the existing Santa Ana River Trial drainage facility, all storm drain improvements would occur within the existing heavily disturbed roadway right-of-way. Any potentially significant effects resulting from the Project's storm drain improvements are analyzed in this Addendum and SEIR No. 339 and mitigated as appropriate. Thus, although the Project would involve the construction and relocation of stormwater drainage facilities, construction itself would not result in a significant environmental effect. Impacts would be less than significant in this regard, and the level of impact would not increase from that identified in SEIR No. 339.

DRY UTILITIES

As a roadway widening and annexation project, Project implementation would not increase demands on natural gas and telecommunication facilities. As a result, the Project would not require or result in the relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. No impacts would occur in this regard, and the level of impact would not increase from that identified in SEIR No. 339.

Santa Ana River Reorganization

The land uses associated with the annexation of land in the Santa Ana River area would be compatible with the existing land uses in the Project vicinity. The proposed amendments to the General Plan, Zoning Map and PTMLUP associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development of the area subject to the reorganization would be subject to analysis pursuant to CEQA. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact to water, wastewater treatment and stormwater drainage facilities, as well as dry utilities, would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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

This impact threshold was modified by the OPR in 2018. The changes to this threshold of significance consist of refinements and clarifications of existing requirements. Although the specific language for this threshold of significance has changed, the analysis was considered in the SEIR No. 339 page 5.10-27.



Previous Significance Determination: SEIR No. 339 determined that based on the Water Supply Assessment for the *PTMLUP*, there would be surplus water through the 20-year planning period. The SEIR impacts associated with water supplies to be less than significant with incorporation of SEIR No. 339 MMs 10-7 through 10-16.

Project-Specific Analysis: As a roadway widening and annexation project, Project implementation would not increase demands on existing water service facilities. The Project does not entail a land use which would require the provision or expansion of water services. Although minimal, water may be used for dust suppression purposes during Project construction; however, sufficient water supplies are available to serve such purposes from existing entitlements and resources. As discussed, the Project does not propose landscaped medians or any other component which would require water connections. The Project would install a water line connection within Orangewood Avenue to enhance the City of Orange's existing water system. The proposed water line connection would provide redundancy should failure arise in other areas of the system and would not involve a capacity increase which would require new or expanded water supply entitlements. No impact would occur in this regard, and the level of impact would not increase from that identified in SEIR No. 339.

The proposed amendments to the General Plan, Zoning Map and *PTMLUP* associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development of the area subject to the reorganization would be subject to analysis pursuant to CEQA. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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

Previous Significance Determination: SEIR No. 339 determined that buildout of the *PTMLUP* would require sewer improvements. With implementation of improvements, the sewer system, including sewer treatment, was anticipated to accommodate development within the *PTMLUP* area based on future buildout conditions. SEIR No. 339 found impacts associated with wastewater treatment service to be less than significant with the incorporation of SEIR No. 339 MMs 10-1 through 10-6.

Project-Specific Analysis: Refer to Response 3.18 (b). As a roadway widening project, the proposed improvements would not increase demand on existing wastewater treatment facilities. The proposed amendments to the General Plan, Zoning Map and *PTMLUP* associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development of the area subject to the reorganization would be subject to analysis pursuant to CEQA. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339. Therefore, no impact would occur and the level of impact associated with the proposed project would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.



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

This impact threshold was modified by the OPR in 2018. The changes to this threshold of significance consist of refinements and clarifications of existing requirements. Although the specific language for this threshold of significance has changed, the analysis was considered in the SEIR No. 339 on page 5.10-33.

Previous Significance Determination: SEIR No. 339 determined that the Olinda Alpha Landfill is the closest facility to the *PTMLUP* area and would be the solid waste facility most often receiving waste from the area. Implementation of the *PTMLUP* would increase the service demand for solid waste disposal beyond existing conditions and would provide more solid waste to the Olinda Alpha Landfill. The SEIR concluded that there would be available landfill capacity in the Orange County landfill system to accommodate the anticipated solid waste stream generated by implementation of the *PTMLUP*. SEIR No. 339 found impacts associated with landfill capacity to be less than significant with the incorporation of SEIR No. 339 MMs 10-18 through 10-20.

Project-Specific Analysis: The City of Anaheim disposes over 99 percent of the City’s solid waste at the five landfills identified in Table 3.19-1, Landfills Summary. The five landfills serving Anaheim have a total permitted capacity of approximately 7.2 million cubic yards plus an additional 45,554 tons per day permitted capacity and a remaining capacity of approximately 4.4 million cubic yards.

**Table 3.19-1
Landfills Summary**

Facility	Amount Disposed from Anaheim in 2018 ¹	Permitted Throughput (tons/day) ²	Permitted Capacity (cubic yards, unless otherwise noted) ²	Remaining Capacity (cubic yards) ²
Azusa Land Reclamation Co. Landfill	2,558	8,000	80,571,760	51,512,201
El Sobrante Landfill	3,809	16,054	209,910,000	143,977,170
Frank R. Bowerman Sanitary Landfill	12,439	11,500	266,000,000	205,000,000
H.M. Holloway Inc.	70,040	2,000	12,600,000	7,522,934
Olinda Alpha Sanitary Landfill	386,433	8,000	148,800,000	34,200,000
TOTAL	475,279	45,554	717,881,760	442,212,305

Note:
 1. CalRecycle Website, Disposal Reporting System (DRS): Jurisdiction Disposal and Alternative Daily Cover (ADC) Tons by Facility <https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility>, Accessed August 28, 2019.
 2. Solid Waste Information System (SWIS), Integrated Waste Management Board, <https://www2.calrecycle.ca.gov/swfacilities/Directory/19-AA-0013/Index>, Accessed August 28, 2019.

Project construction would involve limited amounts of demolition/excavation of existing materials and soils which would require solid waste hauling. The volume of existing materials and soils is not anticipated to be substantially larger than that identified in SEIR No. 339 such that surrounding landfills identified in Table 3.19-1 would be overburdened by the Project’s solid waste disposal needs. The disposal of excavation and construction debris would be subject to compliance with all Federal, State, and local statutes and regulations related to solid waste, including the 50 percent diversion of solid waste requirement pursuant to the California Integrated Waste Management Act of 1989 (AB 939).



Pursuant to AB 939, the City of Anaheim and the City of Orange have each prepared a Source Reduction and Recycling Element (SSRE). Both cities implement their SRRE to ensure that their respective solid waste reduction goals continue to be met. The proposed Project would be required to comply with such goals stipulated under each City's SRRE for diverting solid waste, as applicable. With incorporation of applicable mitigation measures identified under SEIR No. 339, impacts concerning compliance with the statutes and regulations in place relative to solid waste disposal would be less than significant, and the level of impact would not increase from that identified in SEIR No. 339.

The proposed amendments to the General Plan, Zoning Map and PTMLUP associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development of the area subject to the reorganization would be subject to analysis pursuant to CEQA. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.

d) Would the project comply with Federal, State, and local management and reduction statutes and regulations related to solid waste ?

This impact threshold was modified by the OPR in 2018. The changes to this threshold of significance consist of refinements and clarifications of existing requirements. Although the specific language for this threshold of significance has changed, the analysis was considered in the SEIR No. 339 on page 5.10-33 of SEIR No. 339.

Previous Significance Determination: SEIR No. 339 concluded that implementation of the *PTMLUP* would generate increased construction and operational solid waste in the area, so therefore each development project in the *PTMLUP* area would be required to submit project plans to the Streets and Sanitation Division of the Public Works Department for review and approval to ensure that the plans comply with the Solid Waste Act of 1989 (AB 939) and the County of Orange and the City of Anaheim Integrated Waste Management Program, as administered by the City of Anaheim. SEIR No. 339 found impacts associated with solid waste statutes and regulations to be less than significant with incorporation of SEIR No. 339 MMs 10-18 through 10-20.

Project-Specific Analysis: Refer to Response 3.19 (d). Project construction would be subject to conformance with the City of Anaheim and City of Orange's adopted construction and solid waste disposal programs and well as applicable Federal, State, and local regulations concerning solid waste. A less than significant impact would occur, and the level of impact would not increase from that identified in SEIR No. 339.

The proposed amendments to the General Plan, Zoning Map and PTMLUP associated with the Santa Ana River reorganization reflect anticipated future development of these areas, but not a specific development project. Any future development of the area subject to the reorganization would be subject to analysis pursuant to CEQA. Given that the permitted type and intensity of development would be similar to what was previously-analyzed by SEIR No. 339, one can anticipate that the level of impact would not increase from that identified in SEIR No. 339.

Significance Determination: No substantial increase in the level of impact from previous analysis.



3.19.1 MITIGATION PROGRAM

Mitigation Measures from SEIR No. 332

Refer to the Mitigation Measures from SEIR No. 339 below, which are based on adopted Mitigation Measures from SEIR No. 332.

Mitigation Measures from SEIR No. 339

SEIR No. 339 includes measures to reduce potential impacts associated the development and infrastructure improvements within the Platinum Triangle. The following mitigation measures are applicable.¹⁵ Any modifications to the original measures are shown in ~~striketrough~~ for deleted text and new, inserted text is underlined.

MM 10-2 Prior to the approval and ongoing during construction of any street improvement plans within the Platinum Triangle, which encompass area(s) where Orange County Sanitation District (OCSD) will be upsizing trunk lines and/or are making other improvements, the City of Anaheim and/or ~~property owner/developer~~ shall coordinate with the OCSD to ensure that all improvements and construction schedules are coordinated.

MM 10-5 Prior to the approval and ongoing during construction of any street improvement plans within the Platinum Triangle, which encompass area(s) where the Orange County Sanitation District (OCSD) will be upsizing trunk lines and/or are making other improvements, the City of Anaheim and/or ~~property owner~~ shall coordinate with OCSD to ensure that backflow prevention devices are installed at the lateral connections to prevent surcharge flow from entering private properties.

MM 10-18 ~~Prior to the final building and zoning inspections of each development, the property owner/developer shall submit project plans to the Streets and Sanitation Division of the Public Works Department for review and approval to ensure that the Public Works Department, Development Services Division shall confirm all plans submitted during Plans, Specifications, and Estimate phase~~ comply with AB939, and the Solid Waste Reduction Act of 1989, and the County of Orange and City of Anaheim Integrated Waste Management Plans as administered by the City of Anaheim. Implementation of said plan shall commence upon occupancy and shall remain in full effect as required by the Street and Sanitation Division and may include, at its discretion, the following plan components:

- Detailing the locations and design of on-site recycling facilities.
- Participating in the City of Anaheim’s “Recycle Anaheim” program or other substitute program as may be developed by the City or governing agency.
- Facilitating cardboard recycling (especially in retail areas) by providing adequate space and centralized locations for collection and bailing.
- Providing trash compactors for nonrecyclable materials whenever feasible to reduce the total volume of solid waste and number of trips required for collection.
- Providing on-site recycling receptacles accessible to the public to encourage recycling for all businesses, employees, and patrons where feasible.

¹⁵ Mitigation measure numbering corresponds to Platinum Triangle Master Land Use Plan Appendix C, Updated and Modified Mitigation Monitoring Program Number 106C.



- Prohibiting curbside pick-up.
- Ensuring hazardous materials disposal complies with Federal, State, and city regulations.



3.20 WILDFIRE

SEIR No. 339 did not evaluate as it was not required in the CEQA Guidelines at the time SEIR No. 339 was prepared.

On October 26, 2010, the City of Anaheim certified the SEIR No. 339 that analyzed the potential impacts associated with development of the revised Platinum Triangle Expansion Project. Although this previous environmental document did not include a specific wildfire analysis, a supplemental environmental analysis of wildfire impacts cannot be required absent new information on that front. The implementation of project design features and mitigation measures related to wildfire have typically been incorporated into hazard and hazardous materials analysis. Thus, the effect of wildfires would have been raised in 2010 when the City considered the EIR. A challenge to an EIR must be brought within 30 days of the lead agency’s notice of approval. (Pub. Resources Code, § 21167[b].) Under Public Resources Code Section 21166(c), an agency may not require a supplemental environmental review unless new information, which was not known and could not have been known at the time the EIR was approved, becomes available. After a project has been subjected to environmental review, the statutory presumption flips in favor of the project proponent and against further review. (Moss v. County of Humboldt [2008] 162 Cal.App.4th 1041, 1049-1050.) “[S]ection 21166 comes into play precisely because in-depth review has already occurred [and] the time for challenging the sufficiency of the original EIR has long since expired.” (Id., 1050.) There is no competent evidence of new information of severe impact, and thus the City may rely on an addendum. Accordingly, the City finds that wildfire is not “new information” under Public Resources Code Section 21166.

<i>If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:</i>	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?				✓
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				✓
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				✓
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				✓

a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Previous Significance Determination: The Initial Study for SEIR No. 339 concluded that *PTMLUP* buildout would not expose people or structures to significant risk of loss, injury or death involving



wildland fires since the *PTMLUP* area is developed and no undeveloped wildland areas are in or adjacent to the *PTMLUP* area. Because there were no impacts, they were not further analyzed in SEIR No. 339.

Project-Specific Analysis: The Project Site is not located within or near a State responsibility area. According to the California Department of Forestry and Fire Protection's Very High Fire Hazard Severity Zones in LRA Map for Anaheim, the Project Site is not located within a Very High Fire Hazard Severity Zone.¹⁶ No impacts would occur in this regard.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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

Previous Significance Determination: Refer to Response 3.20(a).

Project-Specific Analysis: Refer to Response 3.20(a). No impact would occur.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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

Previous Significance Determination: Refer to Response 3.20(a).

Project-Specific Analysis: Refer to Response 3.20(a). No impact would occur.

Significance Determination: No substantial increase in the level of impact from previous analysis.

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

Previous Significance Determination: Refer to Response 3.20(a).

Project-Specific Analysis: Refer to Response 3.20(a). No impact would occur.

Significance Determination: No substantial increase in the level of impact from previous analysis.

3.20.1 MITIGATION PROGRAM

Mitigation Measures from SEIR No. 332

SEIR No. 332 does not include mitigation measures for wildfire.

¹⁶ California Department of Forestry and Fire Resources, *Very High Fire Hazard Severity Zones in LRA Map for Anaheim*, October 2011.



Mitigation Measures from SEIR No. 339

SEIR No. 339 does not include mitigation measures for wildfire.



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3.21 MANDATORY FINDINGS OF SIGNIFICANCE

<i>Would the project:</i>	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				✓
b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?				✓
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				✓

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

No substantial change from previous analysis. As concluded in [Section 3.1](#) through [3.20](#) of this Addendum, Project implementation would not degrade the quality of the environment. Project implementation would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, or reduce the number or restrict the range of a rare or endangered plant or animal beyond the level of impact as previously analyzed in SEIR No. 339; refer to [Section 3.5, Cultural Resources](#). As indicated in [Section 3.5](#), the Project Site (a segment of Orangewood Avenue and the Santa Ana River reorganization area) does not contain important examples of the major periods of California history or prehistory. In addition, no additional information of substantial importance concerning these issue areas has been discovered since SEIR No. 339 certification. Therefore, Project implementation would not result in any new impacts or increase the severity of impacts previously identified by SEIR No. 339, and no substantial change would occur.

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)?



No substantial change from previous analysis. SEIR No. 339 concluded that implementation of the *PTMLUP* would result in significant and unavoidable cumulative impacts to air quality, and a Statement of Overriding Considerations was adopted by the City of Anaheim. The Project involves a limited footprint that generally aligns with existing Orangewood Avenue roadway right-of-way and the Santa Ana River reorganization area. Based on the Project Site's disturbed conditions, it is not anticipated that Project implementation would result in any new cumulative impacts or increase the severity of a previously identified significant cumulative impact as previously identified by SEIR No. 339, and no substantial change would occur.

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

No substantial change from previous analysis. The Project would not result in environmental effects which would cause a direct or indirect effect on human beings, following conformance with existing SEIR No. 339 mitigation measures and the established regulatory framework. Based on the nature of the proposed improvements, Project implementation would not result in any new impacts or increase the severity of previously identified significant impacts as previously identified by SEIR No. 339, and no substantial change would occur.



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6.0 ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
ADA	Americans with Disabilities Act
ADL	Aerially-deposited lead
AFD	Anaheim Fire Department
ALUC	Airport Land Use Commission
APD	Anaheim Police Department
APN	Assessor parcel number
AQMP	Air Quality Management Plan
ATAM	Anaheim Traffic Analysis Model
BAAQMD	Bay Area Air Quality Management District
BMP	best management practice
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CAT	Climate Action Team
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CH ₄	Methane
City	City of Anaheim
CMP	Congestion Management Plan
CNEL	community noise equivalent level
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ E	carbon dioxide equivalent
DAMP	Drainage Area Management Plan
dBA	A-weighted decibel
DMA	drainage management areas
EIR	environmental impact report
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
GHG	greenhouse gas
GPF	gallons per flush
gsf	gross square feet
GWP	Global warming potential



Acronym/Abbreviation	Definition
HCP	Habitat Conservation Plan
HVAC	heating, ventilation, and air conditioning
I-5	Interstate 5
ICU	Intersection Capacity Utilization
lbs/day	pounds per day
LED	Light-emitting diode
LOS	level of service
LST	localized significance threshold
LUST	leaking underground storage tank
MBTA	Migratory Bird Treaty Act
MLD	most likely descendent
MM	Mitigation Measure
MMRP	Mitigation Monitoring and Reporting Program
MPAH	Master Plan of Arterial Highways
mph	miles per hour
MRZ	Mineral Resource Zone
msl	mean sea level
MT	metric ton
MMT	million metric tons
N ₂ O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan
NO ₂	nitrogen dioxide
NO _x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
O ₃	ozone
OCSD	Orange County Sanitation District
OCTA	Orange County Transportation Authority
OCWD	Orange County Water District
PEC	Potential environmental condition
PM ₁₀	particulate matter less than or equal to 10 micrometers in diameter
PM _{2.5}	particulate matter less than or equal to 2.5 microns in diameter
ppm	parts per million
PRC	Public Resources Code
<i>PTIP</i>	Platinum Triangle Implementation Plan
<i>PTMLUP</i>	Platinum Triangle Master Land Use Plan
PTMU	Platinum Triangle Mixed Use
REC	recognized environmental condition



Acronym/Abbreviation	Definition
RTP	Regional Transportation Plan
SARI	Santa Ana River Interceptor
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCS	Sustainable Communities Strategy
SEIR	Subsequent Environmental Impact Report
SEMS	Standardized Emergency Management System
sf	square feet
SR	State Route
SRA	Source Receptor Area
SWPPP	Stormwater Pollution Prevention Plan
UCI	University of California, Irvine
USFWS	U.S. Fish and Wildlife Service
UST	underground storage tank
VAV	Variable air volume
VPH	Vehicles per hour
VOCs	volatile organic compounds
WQMP	Water Quality Management Plan



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