

1.0 EXECUTIVE SUMMARY

1.1 INTRODUCTION

This Draft Environmental Impact Report (EIR) has been prepared by the City of Anaheim (City) to evaluate potential environmental effects that would result from the Hills Preserve Project (Project). This Draft EIR has been prepared in conformance with the California Environmental Quality Act of 1970 (CEQA) statutes (Cal. Pub. Res. Code, Section 21000 et. seq., as amended) and implementing guidelines (Cal. Code Regs., Title 14, Section 15000 et. seq.) (the State CEQA Guidelines).

The City is the lead agency under CEQA for preparation of this Draft EIR.

1.2 PROJECT LOCATION

The Project is located on an approximately 76-acre Project Site along the south side of Santa Ana Canyon Road, generally between Eucalyptus Drive to the west and Festival Drive to the east, in the City of Anaheim. The Project includes improvements to all or portions of assessor parcel numbers (APNs): 085-051-15, 354-081-44, 356-582-35, 356-581-01, 356-581-02, 356-581-03, 356-582-36, and 356-582-01 through 356-582-34.

Santa Ana Canyon Road is north of the Project Site. Further to the north across Santa Ana Canyon Road is a self-storage facility, SR-91, and a California Highway Patrol weigh station. A utility transmission corridor containing Southern California Edison (SCE) overhead power lines is immediately east of the Project Site. Also, the Anaheim Hills Festival commercial center is approximately 0.1-mile east of the Project Site. Undeveloped, privately-owned parcels that are zoned Hillside Single-Family Residential are located immediately south of the Project Site. Approximately 825 feet (0.16-mile) south of the Project Site is the Deer Canyon Park Preserve. The west boundary of the Project Site is adjacent to a single-family residential subdivision that is accessible via Eucalyptus Drive.

1.3 PROJECT DESCRIPTION

Of the approximately 76-acre Project site, 14.17 acres would be developed with multiple-family residential uses, 6.80 acres¹ would be developed with single-family residential uses, 11.82 acres would be developed with commercial uses, and the remaining 43.22 acres would be designated as open space. The Project's multiple-family residential component consists of 498 wrap-style apartment units to be constructed around the perimeter of a parking structure; these units would consist of approximately 145 studio units, 245 one-bedroom units, 104 two-bedroom units and four three-bedroom units. The multiple-family residential component would include an 18,100 square foot (SF) lobby including leasing offices, lounge areas, mailroom, and library; 4,380 SF of private bowling lanes; 2,500 SF of dedicated resident office areas and conference rooms; and a pool, gym, and locker room. A covered Porte Cochere would be provided at the main entry for drop-off and pick-up. The Project

¹ 1.5 acres of the 6.80 acres for single-family residential uses would be for dedicated private streets.

would also include six single-family residences on lots ranging from 34,429 SF to 42,207 SF. The anticipated density would be approximately 1.13 units/acre. The Project would also include a commercial component, consisting of a total of 80,000 gross SF of building area and associated parking. The Project would construct right-of-way and off-site improvements including: a new four-way intersection at Deer Canyon Road and Santa Ana Canyon Road; a new eastbound deceleration lane on Santa Ana Canyon Road at Deer Canyon Road; a second vehicular access point to the Project on Santa Ana Canyon Road that would provide right-in and right-out only turning movements; and a new potable water line within the Santa Ana Canyon Road right-of-way that would extend from the Project site southwest to Eucalyptus Drive.

A more in-depth description of the Project is provided in Section 3.0, Project Description, of this Draft EIR.

1.4 AREAS OF CONTROVERSY

Section 15123(b)(2) of the State CEQA Guidelines requires that an EIR identify issues to be resolved, including the choice among alternatives and whether or how to mitigate a Project's significant effects on the environment.

As part of the EIR process, a Notice of Preparation (NOP) was released on August 24, 2023 (Appendix A, Notice of Preparation), beginning the 30-day public scoping period for the EIR, which ended on September 25, 2023. During the 30-day NOP scoping period leading up to publication of this Draft EIR, the City received a total of 346 written comments, including five public agency comment letters and 341 comment letters from other individuals and organizations. Copies of the NOP comment letters are provided in Appendix B, Scoping Comment Letters.

During the scoping period, the City held a scoping meeting on September 7, 2023 at the East Anaheim Community Center.

This Draft EIR has incorporated the comments received from the public and public agencies in response to the NOP. Environmental issues that have been raised regarding the Project are summarized in Tables 2-1 and 2-2, which are provided in Section 2.0.

In general, areas of controversy related to the Project that have been raised to date include the following:

- Aesthetics/visual impacts, including:
 - Impacts to views from Santa Ana Canyon Road, a City-designated scenic corridor.
 - Impacts to views from SR-91, a Caltrans-designated scenic highway.
 - Height of the proposed multiple-family residential building.
 - Removal of trees and other vegetation.

- Lighting and glare effects.
- Concerns that the Project would change the character of the Project vicinity.
- Air quality emissions during construction.
- Biological resource impacts including removal of habitat for wildlife and impacts to plants.
- Geological risks including landslide risk to the Project and to the buildings on neighboring parcels.
- Noise impacts, including noise from the proposed rooftop deck of the multiple-family residential building.
- Public service impacts, including increased demand for police, fire, and schools and the potential for diminished quality of public services to result from the Project.
- Recreational impacts, including perceived impacts to Deer Canyon Park Preserve.
- Transportation effects, including exacerbating existing traffic congestion.
- Utilities impacts, including increased demand for water and electricity.
- Wildfire, including:
 - Potential increased delays for future emergency evacuation events.
 - Wildfire risks to the Project and neighboring properties.

1.5 SUMMARY OF ENVIRONMENTAL IMPACTS

This Draft EIR has been prepared to assess the potentially significant effects that could result to the environment from implementation of the Project. For a detailed discussion regarding impact findings for each resource topic is provided in Sections 4.0 through 4.18 of this Draft EIR.

Table 1-1 includes applicable mitigation measures that are identified for impacts determined to be potentially significant. As shown in Table 1-1, Summary of Project Impacts, Mitigation Measures and Level of Significance, the Project would result in less than significant impacts with implementation of mitigation measures for the following topical areas evaluated in this Draft EIR:

- Aesthetics;
- Biological Resources;
- Cultural Resources;
- Energy;
- Geology and Soils;
- Hazards and Hazardous Materials;
- Public Services;

- Tribal Cultural Resources; and
- Wildfire.

The Project would result in significant unavoidable impacts with implementation of mitigation measures for the following topical areas evaluated in this Draft EIR:

- Air Quality;
- Greenhouse Gas Emissions; and
- Transportation.

1.6 ALTERNATIVES TO THE PROJECT

State CEQA Guidelines Section 15126.6 requires consideration and discussion of alternatives to the Project in an EIR. Three alternatives are discussed and evaluated in Section 5.0 of this Draft EIR, which are each summarized below. Two of the three alternatives would minimize environmental impacts that are identified for the proposed Project.

1.6.1 ALTERNATIVE 1 – NO PROJECT/NO BUILD

As required by State CEQA Guidelines Section 15126.6(e)(1), a No Project/No Build alternative was considered. State CEQA Guidelines Section 15126.6(e) requires EIRs to evaluate a “No Project Alternative,” which is The No Project alternative represents conditions in the study area in the absence of approval of the proposed project (State CEQA Guidelines Section 15126.6(e)(1)).

Under Alternative 1, the No Project/No Build alternative, the Project Site would remain as mostly undeveloped lands. The existing private paved maintenance access road (“Deer Canyon Road”) that is located within the western portion of the Project Site that connects to Santa Ana Canyon Road in the north would remain. There are also private dirt access roads throughout the Project Site that would remain. The limited ongoing fuel modification activities (i.e., basic vegetation management) that would be mandated to occur within the Project Site in accordance with AMC and Anaheim Fire & Rescue requirements are assumed to continue. With Alternative 1, there would be no installation of buildings or utility/roadway/trail network improvements and the Project Site would remain in its current state.

1.6.2 ALTERNATIVE 2 – REDUCED DEVELOPMENT

Alternative 2 would consist of the following development components, which would reflect a substantial reduction in the overall scope of development as compared to the proposed Project. Specifically, Alternative 2 would include:

- A maximum total of 40,000 square feet of commercial would be developed instead of 80,000 square feet of commercial as proposed for the Project.

- The six single-family residences and supporting road proposed by the Project would not be developed. This would result in a reduction of approximately 227,509 cubic yards of soil export and a reduction of approximately 10.4 acres of ground disturbance. Instead, this alternative assumes that these 10.4 acres of the Project Site would instead be rezoned as open space.
- The Property Owner/Developer would limit the number of daily users of the multiple-family residential amenities to 50 or fewer non-resident members, which would result in no more than 100 total trips per day related to this aspect of the Project, which is less than the 438 trips that the Traffic Impact Assessment assumes would result from the membership aspect of the Project (LLG 2024a).
- This alternative assumes that the other Project improvements, including multi-use trail and roadway improvements would be installed similar to the Project.

The same regulatory requirements and mitigation measures as identified for the Project are assumed to be applicable to Alternative 2.

A comparison of environmental impacts of the Project and Alternative 2 is provided in Section 5.0 of this Draft EIR.

1.6.3 ALTERNATIVE 3- NO PROJECT/EXISTING GENERAL PLAN

Alternative 3 assumes development of the 76-acre Project Site with those uses that are currently allowed under existing General Plan designations. The Project Site currently contains a mix of General Plan land use designations which consist of Estate Density Residential; Low Density Residential; and Open Space (City of Anaheim 2023a).

For purposes of this analysis and given the somewhat general guidance associated with maximum density under several of the General Plan designations, it is assumed that a total of approximately 93 single-family detached residential units in total, consisting of lots ranging in size, including a significant number of large-lot estate homes, would be constructed. No multiple-family residential uses or commercial uses would be built. These residential units would not be clustered but rather spread throughout the approximately 76-acre Project Site. The lands currently designated as open space would remain, but no additional lands would be designated as open space. Also, while basic utility and roadway network infrastructure to serve the assumed uses would be built, this Alternative would not include the extensive multi-use trail and roadway network improvements contemplated under the Project.

The same regulatory requirements (including the City's local Scenic Corridor Overlay regulations) and similar mitigation measures as identified for the Project would be applicable to Alternative 3 to the extent triggered under CEQA.

1.6.4 ALTERNATIVES CONSIDERED BUT REJECTED

Alternatives considered but dismissed from further analysis are discussed in Section 5.3.1 of this Draft EIR.

**TABLE 1-1
SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Impact Before Significance	Mitigation Measures	Level of Significance After Mitigation
Section 4.1 - Aesthetics			
a) Have a substantial adverse effect on a scenic vista.	Less Than Significant Impact	None	Less Than Significant Impact
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.	Less Than Significant Impact	None	Less Than Significant Impact
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings (Public views are those that are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality.	Significant Impact	<p>MM AES-1 To minimize temporary impacts to views, construction staging areas shall be enclosed with an 8-foot-tall or taller chain-link fence with privacy windscreen or similar materials. The Contractor shall ensure the maintenance of the screening material at all times and shall remove and replace sections of screening material that experience graffiti, wind, or other damage. The Contractor shall provide daily visual inspections to ensure the immediate surroundings of construction staging areas are free from construction-related clutter and to maintain the areas in a reasonably clean and orderly manner throughout the construction period. This measure would be verified in the field during construction by the biological monitor that is required by MM BIO-13. Should the biological monitor identify any fencing or windscreen materials that require repair, the biological monitor shall advise the Property Owner/Developer immediately and the Property Owner/Developer shall be responsible for replacing or otherwise remedying the materials.</p> <p>MM AES-2 The Contractor shall minimize the use of construction night lighting to only the amount needed to perform work safely and maintain appropriate security in accordance with applicable requirements in the AMC. Also, prior to issuance of a grading or building permit, the Property Owner/Developer shall provide a note on plans, and the Contractor shall ensure, that all construction lighting that is used is hooded and downcast, and that direct illumination be limited to the active portions of the Project Site.</p> <p>MM AES-3 To partially screen views of retaining walls, all retaining walls in the Project Site that are visible from Santa Ana Canyon Road shall be landscaped (as defined below) and/or they shall have an aesthetic treatment such as a rock façade treatment. If landscaping is used as the screening method, at a minimum the retaining wall landscaping shall include trees and/or shrubs that are planted at the base of the retaining wall that mature to at least ¾ of the average height of the wall. Alternatively, or in addition, landscaping of retaining walls can consist of the use of climbing vines and/or by using plantable walls. In areas that landscaping is used as a screen, plant materials shall screen at least 50% of each wall when viewed from Santa Ana Canyon Road. Prior to the issuance of a permit for the construction of retaining walls, the Property Owner/Developer shall depict retaining wall aesthetic treatments consistent with the Specific Plan Design Standards, and landscaping on plans and shall submit the plans to the City for review and approval, and shall thereafter adhere to same.</p>	Less Than Significant With Mitigation Incorporated
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.	Significant Impact	<p>MM AES-2 The Contractor shall minimize the use of construction night lighting to only the amount needed to perform work safely and maintain appropriate security in accordance with applicable requirements in the AMC. Also, prior to issuance of a grading or building permit, the Property Owner/Developer shall provide a note on plans, and the Contractor shall ensure, that all construction lighting that is used is hooded and downcast, and that direct illumination be limited to the active portions of the Project Site.</p> <p>MM BIO-11: The Property Owner/Developer shall submit lighting plan for the Project to the City of Anaheim for review and approval prior to issuance of a grading permit. The lighting plan shall provide the type and location of all proposed exterior lighting. All exterior lighting within the proposed development (i.e., exterior building lights, ground level landscaping lights, and lighting on the rooftop deck) and roadways (i.e., streetlights) shall be directed away from undeveloped portions of the Project Site (i.e., undeveloped areas to the west, south, and east of the Project footprint, see Exhibit 4.3-7). Specifically, exterior lighting that is installed along the western, southern, and eastern edges of the Project development shall be down-cast, diffused, shielded,</p>	Less Than Significant With Mitigation Incorporated

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		<p>low intensity, and located so that direct rays are confined to the permanently impacted portions of the Project Site. The lighting plan shall demonstrate that lighting levels will not increase lighting levels more than 0.5-foot-candle over ambient conditions at the Project's edge (i.e., where the buildings, roadways, landscaping, and lighting structures end) adjacent to undeveloped areas to the west, south, and east of the Project.</p> <p>Prior to final building and zoning inspections, the Project Owner/Developer shall provide CC&Rs, reciprocal easements, or a similar document recorded on the property to the City for approval. To ensure ongoing compliance, this exterior lighting requirement shall be included as a mandatory requirement for future owners and occupants in the CC&Rs, reciprocal easements, or a similar document recorded on the property, for commercial, multiple-family, and single-family residential lots. Modifications to the CC&Rs shall also require City approval.</p>	
Section 4.2 - Air Quality			
<p>a) Conflict with or obstruct implementation of the applicable air quality plan.</p>	<p>Significant Impact</p>	<p>MM AQ-1 During construction activities, for all offroad engines that are diesel and above 50 brake horsepower, the contractor shall use engines that comply with USEPA Tier 4 offroad engine standards.</p> <p>MM AQ-2 Super compliant paints for architectural coatings which have less than 10 grams of volatile organic compounds per liter shall be used during Project construction of Phases 1 and 2. A list of super compliant paints can be found at: http://www.aqmd.gov/home/rules-compliance/compliance/vocs/architectural-coatings/super-compliant-coatings.</p> <p>MM TRANS-1 Implement Commute Trip Reduction Marketing. This measure consists of the implementation of a marketing strategy to promote the Project's Commute Trip Reduction (CTR) program that would be available to all employees within the commercial component (through provision of same to the relevant tenants) and multiple-family residential component of the Project. This measure is not applicable to contractors. The intention of this measure is that additional information sharing and marketing as required by this measure shall promote and educate employees about their travel choices to the employment location beyond driving, such as carpooling, taking transit, walking, and biking, thereby reducing VMT and GHG emissions. 100% of employees (i.e., employees who are employed by tenants housed in the commercial component as well as those who are employed by the Property Owner/Developer to serve the multiple-family component) shall be eligible to participate in the CTR program. Prior to issuance of a certificate of occupancy for the multi-family component or the commercial component of the Project, as applicable, the Property Owner/Developer shall document the provision of designated priority parking to the employees of the commercial or multi-family component, as applicable, in the amount required pursuant to applicable requirements for those employees who carpool and also for those that travel to work using electric vehicles and/or zero emission vehicles. As part of the CTR program, the Property Owner/Developer shall provide a minimum \$50 monthly stipend to each participating employee that bicycles or walks to work an average of three or more days per week each month. By February 1 of each year, the Property Owner/Developer shall submit a memorandum to the City describing the marketing measures that had been implemented in the prior year.</p> <p>MM TRANS-2 Provide Information Regarding Ridesharing Opportunities. Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips, VMT and GHG emissions. Prior to issuance of an occupancy permit for the commercial component or the multiple-family residential component in the Project, the Property Owner/Developer shall develop and implement a ridesharing information program for participating employees within the Project Site as part of the CTR program discussed above in MM TRANS-1. As part of this measure and implementation of the CTR Program, the Property Owner/Developer shall establish, support, maintain, and fund a transportation demand</p>	<p>Less Than Significant With Mitigation Incorporated</p>

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		<p>management (TDM) coordinator, whose role would be to provide information regarding ridesharing opportunities to all employees in the Project Site. The CTR program shall provide information regarding ride-matching opportunities to facilitate committed vanpool groups for employees traveling similar routes at similar times. The CTR program shall also include a minimum \$100 monthly stipend per person to each participating employee that carools to work at least three days per week per month. By February 1 of each year, the Property Owner/Developer shall submit a memorandum to the City describing the measures taken pursuant to this measure to promote ridesharing that had been implemented in the prior year.</p> <p>MM TRANS-3 Provide End-of-Trip Bicycle Facilities. This measure includes the installation and maintenance of end-of-trip facilities for employees of the multiple-family residential and commercial buildings in the Project Site. End-of-trip facilities shall include bike parking, bike lockers, showers, and personal lockers, which will be provided by the Property Owner/Developer. In addition to the provision of showers and/or personal lockers that may be required to be incorporated into the Project pursuant to applicable laws and regulations, the Property Owner/Developer shall provide a total of: (a) 52 long-term bicycle parking spaces via secure bike lockers and/or storage rooms and two short-term bike stalls for the multiple-family component, and (b) 20 long-term bicycle parking spaces via secure bike lockers and/or storage rooms and two short-term bicycle parking stalls for the commercial component. The facilities discussed in this measure shall be depicted on the relevant Project plans to be reviewed and approved by the City, and the facilities shall be installed prior to issuance of the relevant occupancy permit.</p> <p>MM TRANS-4 Provide Pedestrian Network Improvements. As part of this measure and to ensure implementation of the relevant design features, prior to issuance of a certificate of occupancy for the commercial and/or multiple-family residential components (whichever comes first), the Property Owner/Developer shall construct approximately 2,850 linear feet of a multi-use (pedestrian, bicycle and equestrian) trail along the south side of Santa Ana Canyon Road that would extend from the northwestern limits of the Project Site (approximately 385 feet east of Eucalyptus Avenue) to an existing sidewalk that ends approximately 385 feet west of Festival Drive. Also, prior to issuance of a certificate of occupancy for the commercial and/or multiple-family residential components (whichever comes first), the Property Owner/Developer shall construct approximately 2,950 linear feet of new sidewalk along the north side of Santa Ana Canyon Road from Eucalyptus Avenue to approximately 760 feet west of Festival Drive if feasible. The Property Owner/Developer shall include a pedestrian crossing at the intersection of Deer Canyon Road and Santa Ana Canyon Road. During final design and prior to issuance of a grading permit as part of the City's Right-of-Way Construction Application Permit, the Property Owner/Developer shall provide the City with updated roadway improvement plans for review and approval that depict the sidewalk improvements described in this measure.</p> <p>MM TRANS-5 Provide Information Regarding Telecommute and/or Alternative Work Schedule Opportunities; Support Telecommuting for Project Residents. Prior to issuance of an occupancy permit for the commercial components in the Project, the TDM coordinator shall provide, as part of the Project's CTR program discussed above under MM TRANS-1, to all tenants of the commercial component available information regarding ways in which employers may consider telecommuting and alternative work schedule opportunities. In addition, the Property Owner/Developer shall provide all Project residents of the multiple-family residential component access to on-site "work-from-home" communal spaces, and shall also consider reasonable opportunities for employees of the multiple-family residential component, taking into due account job responsibilities, to telecommute to work at least one day per work week, and/or to have an alternative work schedule such as a 9/80 or 10/40 schedule to allow for fewer overall trips to the office.</p>	

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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.	Significant Impact	<p>MM AQ-1 During construction activities, for all offroad engines that are diesel and above 50 brake horsepower, the contractor shall use engines that comply with USEPA Tier 4 offroad engine standards.</p> <p>MM AQ-2 Super compliant paints for architectural coatings which have less than 10 grams of volatile organic compounds per liter shall be used during Project construction of Phases 1 and 2. A list of super compliant paints can be found at: http://www.aqmd.gov/home/rules-compliance/compliance/vocs/architectural-coatings/super-compliant-coatings.</p>	Less Than Significant With Mitigation Incorporated
c) Expose sensitive receptors to substantial pollutant concentrations.	Significant Impact	<p>MM AQ-1 During construction activities, for all offroad engines that are diesel and above 50 brake horsepower, the contractor shall use engines that comply with USEPA Tier 4 offroad engine standards.</p> <p>MM AQ-2 Super compliant paints for architectural coatings which have less than 10 grams of volatile organic compounds per liter shall be used during Project construction of Phases 1 and 2. A list of super compliant paints can be found at: http://www.aqmd.gov/home/rules-compliance/compliance/vocs/architectural-coatings/super-compliant-coatings.</p>	Significant and Unavoidable
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	Less Than Significant Impact	None	Less Than Significant Impact
Section 4.3 – Biological Resources			
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.	Significant Impact	<p>MM BIO-1: The Property Owner/Developer shall mitigate for impacts to coastal sage scrub and coastal California gnatcatcher prior to the issuance of a grading permit through one or a combination of the following options, as elected by the Project Owner/Developer and approved by the USFWS and CDFW: (1) payment of the NCCP/HCP mitigation fee (only if allowed by the USFWS and CDFW because the Project is within an Existing Use area); (2) long-term preservation of existing coastal sage scrub habitat occupied by coastal California gnatcatchers at an on-site or off-site location; and/or (3) restoration of coastal sage scrub habitat at an on-site or off-site location. Coastal sage scrub shall be replaced at a minimum 1:1 ratio, or as otherwise determined by the USFWS and CDFW.</p> <p>Prior to the issuance of a grading permit, the Property Owner/Developer shall obtain a Biological Opinion from the USFWS describing the mitigation requirements. If the mitigation fee option is allowed, the Property Owner/Developer shall pay the mitigation fee (calculated based on the above-referenced ratio) to the NCCP Non-profit Corporation for the replacement of impacted coastal sage scrub resources prior to the issuance of a grading permit. If the preservation option is selected, a Long Term Protection and Management Plan (LTPMP) shall be prepared by a qualified Restoration Ecologist and shall be reviewed and approved by the USFWS and CDFW prior to the issuance of a grading permit. If the option of restoration of coastal sage scrub habitat is selected, a Habitat Mitigation and Monitoring Program (HMMP) shall be prepared by a qualified Restoration Ecologist and reviewed and approved by the USFWS and CDFW prior to the issuance of a grading permit. If either options #2 or #3 are selected, the Property Owner/Developer shall be responsible for implementing either the LTPMP and/or HMMP and ensuring that the mitigation program achieves the approved performance criteria. If either options #2 or #3 are selected, the Property Owner/Developer shall implement the LTPMP or HMMP per its specified requirements, materials, methods, and performance criteria.</p> <p>If option #3 is selected, the HMMP shall include the following items:</p> <ul style="list-style-type: none"> • Responsibilities and Qualifications. The responsibilities and qualifications of the Property Owner/Developer, ecological specialists, and restoration (landscape) contracting personnel who shall implement the plan shall be specified. At a minimum, the HMMP shall specify that the ecological specialists and contractors have performed successful installation and long-term 	Less Than Significant With Mitigation Incorporated

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		<p>monitoring and maintenance of Southern California native habitat mitigation/restoration programs. A successful program shall be defined as one that has been signed off on by the resource agencies.</p> <ul style="list-style-type: none"> • Performance Criteria. Mitigation performance criteria to be specified in the HMMP shall conform to the resource agency permit conditions. The HMMP shall state that the use of the mitigation site(s) by special status wildlife species (e.g., coastal California gnatcatcher), though not a requirement for site success, would be regarded by the resource agencies as a significant factor in considering eligibility for program sign-off. • Site Selection. The mitigation site(s) shall be determined in coordination with the Property Owner/Developer and the resource agencies. To maximize the value of the habitat provided, the site(s) shall be contiguous to other permanently preserved parcels. The soils and other physical characteristics of the potential mitigation site(s) shall be analyzed to ensure that proper conditions exist for the establishment of coastal sage scrub habitat. • Seed Materials Procurement. At least one year prior to mitigation implementation, the Property Owner/Developer or its consultants/contractors shall initiate collection of the native seed materials specified in the HMMP. All seed mixes shall be of local origin (i.e., collected within 20 miles, and within the same watershed, as the selected restoration/enhancement site), to ensure genetic integrity. No seed materials of unknown or non-local geographic origin shall be used. Seed collection shall be prioritized per habitat area, in the following order: (a) Project impact areas (highest priority); (b) other on-site habitat areas; and (c) off-site habitat areas (lowest priority), assuming availability of seed species in multiple locations. • Wildlife Surveys and Protection. The HMMP shall specify any wildlife surveys (i.e., nesting bird surveys, focused/protocol surveys for special status species [e.g., coastal California gnatcatcher]) and biological monitoring that are required to avoid significant adverse impacts to wildlife species during the performance of mitigation site preparation, installation, or maintenance tasks. The HMMP shall also describe potential restrictions on these tasks due to special status wildlife conditions on the mitigation site(s) (e.g., suspension of these tasks during the nesting bird season). • Site Preparation and Plant Materials Installation. Mitigation site preparation shall include all of the following: (a) protection of existing native species and habitats (including compliance with applicable seasonal restrictions, if any); (b) installation of protective fencing and/or signage (as needed); (c) initial trash and weed removal (outside the nesting bird season) and methods; (d) soil treatments, as needed (i.e., imprinting, de-compacting); (e) installation of erosion-control measures (i.e., fully natural/bio-degradable [not “photo-degradable” plastic mesh] fiber roll); (f) application of salvaged native plant materials (i.e., coarse woody debris), as available and supervised by a biological monitor; (g) temporary irrigation installation; (h) a minimum one-year preliminary weed abatement program (prior to the installation of native plant and seed materials)—including specification of approved herbicides; (i) planting of container plant and cutting species; and (j) seed mix application. • Schedule. An implementation schedule shall be developed that includes planting and seeding to occur in the fall and winter (i.e., between November 1 and January 31) and the frequency of long-term maintenance and monitoring activities (including the dates of annual quantitative surveys, as described below) for five years or until the mitigation program achieves the approved performance criteria and has been released from maintenance requirements by the resource agencies. • Maintenance Program. The Maintenance Program shall include (a) protection of existing native species and habitats (including compliance with applicable seasonal restrictions, if any); (b) maintenance of protective fencing and/or signage; (c) trash and weed removal—including specification of approved herbicides; (d) maintenance of erosion-control measures; (e) inspection/repairs of irrigation components; (f) replacement of dead container plant and 	

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		<p>cuttings (as needed); (g) application of remedial seed mixes (as needed); (h) herbivory control; and (i) removal of all non-vegetative materials (i.e., fencing, signage, irrigation components) upon Project completion. The mitigation site(s) shall be maintained for a period of five years to ensure successful coastal sage scrub habitat establishment within the restored/enhanced sites; however, the Property Owner/Developer may request to be released from maintenance requirements by the resource agencies prior to five years if the mitigation program has achieved all performance criteria.</p> <ul style="list-style-type: none"> • Monitoring Program. The Monitoring Program shall include (a) qualitative monitoring (i.e., general habitat conditions, photo-documentation from established photo stations); (b) quantitative monitoring; (c) annual monitoring reports, which shall be submitted to the Property Owner/Developer and the resource agencies for five years following implementation of site preparation and plant materials installation activities; and (d) wildlife surveys and monitoring as described above. The annual monitoring reports shall include a detailed discussion of mitigation site performance (e.g., measured vegetation coverage and diversity) and compliance with required performance criteria, a discussion of wildlife species' use of the restored and/or enhanced habitat area(s), and a list of proposed remedial measures to address noncompliance (if any) with any performance criteria. The site(s) shall be monitored for five years following completion of site preparation and plant materials installation activities or until the Property Owner/Developer has been released from maintenance requirements by the resource agencies. • Long-term preservation. Long-term preservation of the mitigation site(s) shall be outlined in the HMMP to ensure that the mitigation site(s) are not impacted by future development. <p>The NCCP/HCP requires the following construction-related measures by implemented during construction:</p> <ul style="list-style-type: none"> • To the maximum extent practicable, no grading of coastal sage scrub habitat that is occupied by nesting gnatcatchers shall occur during the breeding season (i.e., February 15 through July 15). It is expressly understood that this provision and the remaining provisions of these "construction-related minimization measures," are subject to public health and safety considerations. These considerations include unexpected slope stabilization, erosion control measures, and emergency facility repairs. In the event of such public health and safety circumstances, the Property Owner/Developer shall provide USFWS/CDFW with the maximum practicable notice (or such notice as is specified in the NCCP/HCP) to allow for capture of gnatcatchers, cactus wrens, and any other coastal sage scrub Covered Species that are not otherwise flushed and shall carry out the following measures only to the extent as practicable in the context of the public health and safety considerations. • Prior to the commencement of grading operations or other activities involving significant soil disturbance, all areas of coastal sage scrub habitat to be avoided under the provisions of the NCCP/HCP, shall be identified with temporary fencing or other markers clearly visible to construction personnel. Additionally, prior to the commencement of grading operations or other activities involving disturbance of coastal sage scrub, a survey shall be conducted to locate gnatcatchers and cactus wrens within 100 feet of the outer extent of projected soil disturbance activities and the locations of any such species shall be clearly marked and identified on the construction/grading plans. • A monitoring biologist, acceptable to USFWS/CDFW shall be onsite during any clearing of coastal sage scrub. The Property Owner/Developer shall advise USFWS/CDFW at least 7 calendar days prior to the clearing of any habitat occupied by Covered Species to allow USFWS/CDFW to work with the monitoring biologist in connection with bird flushing capture activities. The monitoring biologist shall flush Covered Species (avian or other mobile Covered Species) from occupied habitat areas immediately prior to brush-clearing and earth-moving activities. If birds cannot be flushed, they shall be captured in mist nets, if feasible, and relocated to areas of the site(s) to be 	

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Threshold of Significance	Impact Before Significance	Mitigation Measures	Level of Significance After Mitigation
		<p>protected or to the NCCP/HCP Reserve System. It shall be the responsibility of the monitoring biologist to assure that Covered Bird Species shall not be directly impacted by brush-clearing and earth-moving equipment in a manner that also allows for construction activities on a timely basis.</p> <ul style="list-style-type: none"> Following the completion of initial grading/earth movement activities, all areas of coastal sage scrub habitat to be avoided by construction equipment and personnel shall be marked with temporary fencing or other appropriate markers clearly visible to construction personnel. No construction access, parking, or storage of equipment shall be permitted within such marked areas. In areas bordering the NCCP Reserve System containing significant coastal sage scrub identified in the NCCP/HCP for protection, vehicle transportation routes between cut-and-fill locations shall be restricted to a minimum number during construction consistent with Project construction requirements. Waste dirt or rubble shall not be deposited on adjacent coastal sage scrub identified in the NCCP/HCP for protection. Pre-construction meetings involving the monitoring biologist, construction supervisors, and equipment operators shall be conducted and documented to ensure maximum practicable adherence to these measures. Coastal sage scrub identified in the NCCP/HCP for protection and located within the likely dust drift radius of construction areas shall be periodically sprayed with water to reduce accumulated dust on the leaves as recommended by the monitoring biologist. <p>MM BIO-2: The Property Owner/Developer shall mitigate for impacts to chaparral vegetation (i.e., toyon-sumac chaparral and toyon-sumac chaparral/ruderal) prior to issuance of a grading permit through one or a combination of the following options, as elected by the Project Owner/Developer and as approved by the City of Anaheim: (1) payment of the adopted applicable in-lieu mitigation fee to an approved mitigation bank; (2) long-term preservation of existing chaparral habitat at an on-site or off-site location; and/or (3) restoration of chaparral habitat at an on-site or off-site location. Toyon-sumac chaparral shall be replaced at a minimum 1:1 ratio and toyon-sumac chaparral/ruderal shall be replaced at a minimum 0.5:1 ratio. The option selected by the Project Owner/Developer shall be approved by the City of Anaheim prior to issuance of a grading permit.</p> <p>If the in-lieu mitigation fee option is selected, the Property Owner/Developer shall pay the mitigation fee (calculated based on the above-referenced ratio) to the mitigation bank for the replacement of impacted chaparral resources prior to the issuance of a grading permit. If the preservation option is selected, a LTPMP shall be prepared by a qualified Restoration Ecologist for review and approval by the City of Anaheim prior to issuance of a grading permit. If appropriate, the LTPMP may be combined with the coastal sage scrub LTPMP (described under MM BIO-1). If the option of restoration of chaparral habitat is selected, a HMMP shall be prepared by a qualified Restoration Ecologist for review and approval by the City of Anaheim prior to the issuance of a grading permit. If appropriate, the HMMP may be combined with the coastal sage scrub HMMP (described under MM BIO-1). If either options #2 or #3 are selected, the Property Owner/Developer shall be responsible for implementing either the LTPMP or HMMP and ensuring that the mitigation program achieves the approved performance criteria. The Property Owner/Developer shall implement the LTPMP or HMMP per its specified requirements, materials, methods, and performance criteria.</p> <p>If selected, the HMMP shall include the following items:</p> <ul style="list-style-type: none"> Responsibilities and Qualifications. The responsibilities and qualifications of the Property Owner/Developer, ecological specialists, and restoration (landscape) contracting personnel who shall implement the plan shall be specified. At a minimum, the HMMP shall specify that the ecological specialists and contractors have performed successful installation and long-term monitoring and maintenance of Southern California native habitat mitigation/restoration programs. A successful program shall be defined as one that has been signed off on by the City of Anaheim. 	

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SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Impact Before Significance	Mitigation Measures	Level of Significance After Mitigation
		<ul style="list-style-type: none"> • Performance Criteria. Mitigation performance criteria to be specified in the HMMP shall conform to the mitigation requirements. The HMMP shall state that the use of the mitigation site(s) by special status wildlife species, though not a requirement for site success, would be regarded by the City of Anaheim as a significant factor in considering eligibility for program sign-off. • Site Selection. The mitigation site(s) shall be determined in coordination with the Property Owner/Developer and the City. To maximize the value of the habitat provided, the site(s) shall be contiguous to other permanently preserved parcels. The soils and other physical characteristics of the potential mitigation site(s) shall be analyzed to ensure that proper conditions exist for the establishment of chaparral habitat. • Seed Materials Procurement. At least one year prior to mitigation implementation, the Property Owner/Developer or its consultants/contractors shall initiate collection of the native seed materials specified in the HMMP. All seed mixes shall be of local origin (i.e., collected within 20 miles, and within the same watershed, as the selected restoration/enhancement site), to ensure genetic integrity. No seed materials of unknown or non-local geographic origin shall be used. Seed collection shall be prioritized per habitat area, in the following order: (a) Project impact areas (highest priority); (b) other on-site habitat areas; and (c) off-site habitat areas (lowest priority), assuming availability of seed species in multiple locations. • Wildlife Surveys and Protection. The HMMP shall specify any wildlife surveys (i.e., nesting bird surveys, focused/protocol surveys for special status species) and biological monitoring that are required to avoid significant adverse impacts to wildlife species during the performance of mitigation site preparation, installation, or maintenance tasks. The HMMP shall also describe potential restrictions on these tasks due to special status wildlife conditions on the mitigation site(s) (e.g., suspension of these tasks during the nesting bird season). • Site Preparation and Plant Materials Installation. Mitigation site preparation shall include all of the following: (a) protection of existing native species and habitats (including compliance with applicable seasonal restrictions, if any); (b) installation of protective fencing and/or signage (as needed); (c) initial trash and weed removal (outside the nesting bird season) and methods; (d) soil treatments, as needed (i.e., imprinting, de-compacting); (e) installation of erosion-control measures (i.e., fully natural/bio-degradable [not “photo-degradable” plastic mesh] fiber roll); (f) application of salvaged native plant materials (i.e., coarse woody debris), as available and supervised by a biological monitor; (g) temporary irrigation installation; (h) a minimum one-year preliminary weed abatement program (prior to the installation of native plant and seed materials)—including specification of approved herbicides; (i) planting of container plant and cutting species; and (j) seed mix application. • Schedule. An implementation schedule shall be developed that includes planting and seeding to occur in the fall and winter (i.e., between November 1 and January 31) and the frequency of long-term maintenance and monitoring activities (including the dates of annual quantitative surveys, as described below) for five years or until the mitigation program achieves the approved performance criteria and has been released from maintenance requirements by the resource agencies. • Maintenance Program. The Maintenance Program shall include (a) protection of existing native species and habitats (including compliance with seasonal restrictions, if any); (b) maintenance of protective fencing and/or signage; (c) trash and weed removal—including specification of approved herbicides; (d) maintenance of erosion-control measures; (e) inspection/repairs of irrigation components; (f) replacement of dead container plant and cuttings (as needed); (g) application of remedial seed mixes (as needed); (h) herbivory control; and (i) removal of all non-vegetative materials (i.e., fencing, signage, irrigation components) following implementation of site preparation and plant materials installation activities. The mitigation site(s) shall be maintained for a period of five years to ensure successful coastal sage scrub habitat establishment within the restored/enhanced site(s); however, the Property Owner/Developer may request to be released 	

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Threshold of Significance	Impact Before Significance	Mitigation Measures	Level of Significance After Mitigation
		<p>from maintenance requirements by the resource agencies prior to five years if the mitigation program has achieved all performance criteria.</p> <ul style="list-style-type: none"> Monitoring Program. The Monitoring Program shall include (a) qualitative monitoring (i.e., general habitat conditions, photo-documentation from established photo stations); (b) quantitative monitoring; (c) annual monitoring reports, which shall be submitted to the Property Owner/Developer and the resource agencies for five years following implementation of site preparation and plant materials installation activities; and (d) wildlife surveys and monitoring as described above. The annual monitoring reports shall include a detailed discussion of mitigation site performance (e.g., measured vegetation coverage and diversity) and compliance with required performance criteria, a discussion of wildlife species' use of the restored and/or enhanced habitat area(s), and a list of proposed remedial measures to address noncompliance (if any) with any performance criteria. The site(s) shall be monitored for five years following completion of site preparation and plant materials installation activities or until the Property Owner/Developer has been released from maintenance requirements by the resource agencies. Long-term preservation. Long-term preservation of the mitigation site(s) shall be outlined in the HMMP to ensure that the mitigation site(s) are not impacted by future development. <p>MM BIO-3: Prior to initiation of relevant Project construction activities, the Property Owner/Developer shall obtain all necessary permits that are required under applicable laws and regulations for impacts to CDFW and RWQCB jurisdictional areas. Potential mitigation options shall include one or both of the following, as approved by CDFW and RWQCB: (1) payment of an in-lieu mitigation fee to an approved mitigation bank; (2) long-term preservation of existing riparian habitat at an on-site or off-site location; or (3) restoration of riparian habitat at an on-site or off-site location. Riparian habitat/jurisdictional areas shall be replaced at a minimum 1:1 ratio, or as otherwise determined by the resource agencies.</p> <p>If the in-lieu mitigation fee option is selected by the Property Owner/Developer, the Property Owner/Developer shall pay the applicable mitigation fee (calculated based on the above-referenced ratio) to the mitigation bank for the replacement of impacted riparian resources prior to the initiation of the relevant Project construction activities. If the preservation option is selected, a LTPMP shall be prepared by a qualified Restoration Ecologist for review and approval by the CDFW and RWQCB; if appropriate, the LTPMP may be combined with the coastal sage scrub LTPMP (described under MM BIO-1). If restoration of riparian habitat is selected, a HMMP shall be prepared by a qualified Restoration Ecologist for review and approval by the CDFW and RWQCB; if appropriate, the HMMP may be combined with the coastal sage scrub HMMP (described under MM BIO-1). If options #2 or 3 are selected, the Property Owner/Developer shall be responsible for implementing either the LTPMP or HMMP and ensuring that the mitigation program achieves the approved performance criteria. If options #2 or 3 are selected, the Property Owner/Developer shall implement the LTPMP or HMMP per its specified requirements, materials, methods, and performance criteria.</p> <p>The HMMP shall include the following items:</p> <ul style="list-style-type: none"> Responsibilities and Qualifications. The responsibilities and qualifications of the Property Owner/Developer, ecological specialists, and restoration (landscape) contracting personnel who shall implement the plan shall be specified. At a minimum, the HMMP shall specify that the ecological specialists and contractors have performed successful installation and long-term monitoring and maintenance of Southern California native habitat mitigation/restoration programs, implemented under USACE, CDFW, and RWQCB permit conditions. A successful program shall be defined as one that has been signed off on by the resource agencies. Performance Criteria. Mitigation performance criteria to be specified in the HMMP shall conform to the resource agency permit conditions. The HMMP shall state that the use of the mitigation site(s) by special status wildlife species (e.g., least Bell's vireo), though not a requirement for site 	

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		<p>success, would be regarded by the resource agencies as a significant factor in considering eligibility for program sign-off.</p> <ul style="list-style-type: none"> • Site Selection. The mitigation site(s) shall be determined in coordination with the Property Owner/Developer and the resource agencies. To maximize the value of the habitat provided, the site(s) shall be contiguous to other permanently preserved parcels. The soils, hydrology/hydraulics, and other physical characteristics of the potential mitigation site(s) shall be analyzed to ensure that proper conditions exist for the establishment of riparian habitat. • Seed Materials Procurement. At least one year prior to mitigation implementation, the Property Owner/Developer or its consultants/contractors shall initiate collection of the native seed materials specified in the HMMP. All seed mixes shall be of local origin; i.e., collected within 20 miles, and within the same watershed, as the selected restoration/enhancement site(s), to ensure genetic integrity. No seed materials of unknown or non-local geographic origin shall be used. Seed collection shall be prioritized per habitat area, in the following order: (a) project impact areas (highest priority); (b) other on-site habitat areas; and (c) off-site habitat areas (lowest priority), assuming availability of seed species in multiple locations. • Wildlife Surveys and Protection. The HMMP shall specify any wildlife surveys (i.e., nesting bird surveys, focused/protocol surveys for special status species [e.g., least Bell’s vireo]) and biological monitoring that are required to avoid significant adverse impacts to wildlife species during the performance of mitigation site preparation, installation, or maintenance tasks. The HMMP shall also describe potential restrictions on these tasks due to special status wildlife conditions on the mitigation site(s) (e.g., suspension of these tasks during the nesting bird season, as defined in project permits). • Site Preparation and Plant Materials Installation. Mitigation site preparation shall include all of the following: (a) protection of existing native species and habitats (including compliance with applicable seasonal restrictions, if any); (b) installation of protective fencing and/or signage (as needed); (c) initial trash and weed removal (outside the nesting bird season) and methods; (d) soil treatments, as needed (i.e., imprinting, de-compacting); (e) installation of erosion-control measures (i.e., fully natural/bio-degradable [not “photo-degradable” plastic mesh] fiber roll); (f) application of salvaged native plant materials (i.e., coarse woody debris), as available and supervised by a biological monitor; (g) temporary irrigation installation; (h) a minimum one-year preliminary weed abatement program (prior to the installation of native plant and seed materials)—including specification of approved herbicides; (i) planting of container plant and cutting species; and (j) seed mix application. • Schedule. An implementation schedule shall be developed that includes planting and seeding to occur in the fall and winter (i.e., between November 1 and January 31) and the frequency of long-term maintenance and monitoring activities (including the dates of annual quantitative surveys, as described below) for five years or until the mitigation program achieves the approved performance criteria and has been released from maintenance requirements by the resource agencies. • Maintenance Program. The Maintenance Program shall include (a) protection of existing native species and habitats (including compliance with applicable seasonal restrictions, if any); (b) maintenance of protective fencing and/or signage; (c) trash and weed removal—including specification of approved herbicides; (d) maintenance of erosion-control measures; (e) inspection/repairs of irrigation components; (f) replacement of dead container plant and cuttings (as needed); (g) application of remedial seed mixes (as needed); (h) herbivory control; and (i) removal of all non-vegetative materials (i.e., fencing, signage, irrigation components) following implementation of site preparation and plant materials installation activities. The mitigation site(s) shall be maintained for a period of five years to ensure successful riparian habitat establishment within the restored/enhanced sites; however, the Property Owner/Developer may request to be released from maintenance requirements by the resource agencies prior to five years if the mitigation program has achieved all performance criteria. 	

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Threshold of Significance	Impact Before Significance	Mitigation Measures	Level of Significance After Mitigation
		<ul style="list-style-type: none"> • Monitoring Program. The Monitoring Program shall include (a) qualitative monitoring (i.e., general habitat conditions, photo-documentation from established photo stations); (b) quantitative monitoring; (c) annual monitoring reports, which shall be submitted to the Property Owner/Developer and the resource agencies for five years following implementation of site preparation and plant materials installation activities; and (d) wildlife surveys and monitoring as described above. The annual monitoring reports shall include a detailed discussion of mitigation site performance (e.g., measured vegetation coverage and diversity) and compliance with required performance criteria, a discussion of wildlife species' use of the restored and/or enhanced habitat area(s), and a list of proposed remedial measures to address noncompliance with any performance criteria. The site(s) shall be monitored for five years or until the Property Owner/Developer has been released from maintenance requirements by the resource agencies. • Long-term preservation. Long-term preservation of the mitigation site(s) shall be outlined in the HMMP to ensure that the mitigation sites are not impacted by future development. <p>MM BIO-4: If CDFW determines that listing of the Crotch's bumble bee is not warranted prior to or during implementation of the Project's construction, this measure shall not be required and no further mitigation shall be necessary.</p> <p>Until CDFW makes a determination, or if CDFW determines that listing of the Crotch's bumble bee is warranted, the following measure shall be required.</p> <p>Prior to issuance of a grading permit, the Property Owner/Developer shall retain a qualified Biologist to conduct pre-construction focused surveys for Crotch's bumble bee within 500 feet of the relevant Project construction work area. The survey(s) shall be performed during the appropriate window for this species (i.e., March to July). Three visual surveys shall be conducted by a qualified Biologist. Surveys shall be conducted at least two hours after sunrise and three hours before sunset during suitable weather conditions. Sunny days with temperatures greater than 60 degrees Fahrenheit and wind speeds less than 8 mph are optimal, but partially cloudy days or overcast conditions are permissible if a person's shadow is visible. Surveys shall not be conducted during wet, foggy, or rainy conditions. Meandering transects shall be walked slowly within the Project focused survey area to obtain a 100% survey cover. Transect spacing shall depend on the habitat. The Biologist shall search for Crotch's bumble bee activity and the presence of ground nests. Cavities such as mammal burrows shall be inspected with binoculars for evidence of bumble bee use. If multiple exiting/entering bumble bees are observed at a cavity, further observation shall occur until nesting is confirmed (e.g., multiple individuals entering the cavity).</p> <p>If no Crotch's bumble bee are observed, no further action shall be required within the year that the focused surveys is conducted, and no further mitigation shall be necessary. Because Crotch's bumble bee moves ground nests annually, the pre-construction focused surveys shall be repeated if construction does not begin before the spring (i.e., March 1) following the previous focused survey(s).</p> <p>If Crotch bumble bee is present as determined by the focused survey(s), the Property Owner/Developer shall notify the City immediately and then shall consult with CDFW to determine if a permit (2081 or 2080.1) will be needed under applicable laws and regulations. If a permit is required under applicable laws and regulations, then the Property Owner/Developer shall obtain said permit prior to initiation of construction activities within 100 feet of the nest site. If no permit is needed, the Property Owner/Developer shall provide documentation to the City in the form of an email or memorandum from CDFW stating that no permit would be needed. If a ground nest is observed, it shall be protected in place until it is no longer active as determined by the qualified Biologist. An initial protective buffer of at least 100 feet shall be established around the active ground nest until CDFW can be consulted. A qualified Biologist shall determine the protective buffer distance needed depending on the location with respect to construction activities and the type of construction activities occurring and CDFW shall approve any protective buffer that is proposed that is under 100 feet.</p>	

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		<p>A Letter Report shall be prepared to document the results of the pre-construction surveys and shall be provided to the City and CDFW within 30 days of completion of the survey(s).</p> <p>MM BIO-5: Per the <i>Staff Report on Burrowing Owl Mitigation</i> (CDFW 2012), the Property Owner/Developer shall retain a qualified Biologist to conduct a pre-construction survey for the burrowing owl no less than 14 days prior to any ground disturbance by the Project's construction activities and no greater than 30 days prior to ground disturbance in each Project work area. The pre-construction survey(s) for each work area shall include the area of proposed disturbance plus a 500-foot buffer (if access is available). If the pre-construction survey does not result in observing an active burrow, then no further mitigation is required.</p> <p>If an active burrow is observed outside the breeding season (i.e., September 1 to January 31) and it cannot feasibly be avoided, the burrowing owl shall be passively excluded from the burrow following methods described in applicable CDFW guidelines. One-way doors shall be used to exclude owls from the burrows; doors shall be left in place for at least 48 hours. Once the burrow is determined to be unoccupied by the qualified Biologist, the burrow shall be closed by the qualified Biologist who shall excavate the burrow using hand tools. Once the foregoing occurs, then no further mitigation is required.</p> <p>If an active burrow is observed outside the breeding season (i.e., September 1 to January 31) and it can be feasibly avoided, the Biologist shall determine an appropriate protective buffer for the burrow based on applicable CDFW guidelines. The buffer shall range from 160 feet to 1,640 feet depending on the level of impact and the time of year (Table 10). The designated buffer shall be clearly marked in the field and shall be mapped as an Environmentally Sensitive Area (ESA) on construction plans. The WEAP training shall include information on the protective buffer. The Property Owner/Developer or its designee shall contact CDFW to determine whether a reduced buffer can be accommodated without adversely impacting occupied burrows.</p> <p>If an active burrow is observed during the breeding season (February 1 to August 31), the active burrow shall be protected until nesting activity has ended (i.e., all young have fledged from the burrow). The Biologist shall determine the appropriate protective buffer for the burrow based on applicable CDFW guidelines. The buffer shall range from 656 to 1,640 feet depending on the level of impact and the time of year (in the table below). The designated buffer shall be clearly marked in the field and shall be mapped as an ESA on construction plans. The Worker Environmental Awareness Program (WEAP) training shall include information on the protective buffer. The Property Owner/Developer or its designee shall contact CDFW to determine whether a reduced buffer can be accommodated without adversely impacting occupied burrows. Construction shall be allowed to proceed when the qualified Biologist has determined that all fledglings have left the nest.</p> <p align="center">BURROWING OWL PROTECTIVE BUFFER SIZES</p> <table border="1" data-bbox="1479 1407 2343 1709"> <thead> <tr> <th rowspan="2">Time of Year</th> <th colspan="3">Level of Disturbance</th> </tr> <tr> <th>Low</th> <th>Medium</th> <th>High</th> </tr> </thead> <tbody> <tr> <td>April 1 to August 15</td> <td>656 feet (200 meters)</td> <td>1,640 feet (500 meters)</td> <td>1,640 feet (500 meters)</td> </tr> <tr> <td>August 16 to October 15</td> <td>656 feet (200 meters)</td> <td>656 feet (200 meters)</td> <td>1,640 feet (500 meters)</td> </tr> <tr> <td>October 16 to March 31</td> <td>164 feet (50 meters)</td> <td>328 feet (100 meters)</td> <td>1,640 feet (500 meters)</td> </tr> </tbody> </table> <p>These buffers will be utilized unless a reduced buffer is authorized by CDFW.</p>	Time of Year	Level of Disturbance			Low	Medium	High	April 1 to August 15	656 feet (200 meters)	1,640 feet (500 meters)	1,640 feet (500 meters)	August 16 to October 15	656 feet (200 meters)	656 feet (200 meters)	1,640 feet (500 meters)	October 16 to March 31	164 feet (50 meters)	328 feet (100 meters)	1,640 feet (500 meters)	
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		<p>Upon completion of the pre-construction burrowing owl survey(s), a Letter Report shall be prepared and submitted to CDFW documenting the results of the survey(s) within two weeks of completion of the survey effort. If an active burrow is observed, the Letter Report shall include a description of the protective buffer that has been designated and a summary of any additional correspondence with the CDFW.</p> <p>If time lapses of greater than 30 days occur during grading in a particular portion of the work area, an additional survey shall be conducted by a qualified Biologist within 24 hours prior to vegetation clearing and/or ground disturbance in that area. If any new burrowing owl burrows are observed, the conditions above shall be applied.</p> <p>MM BIO-6: To the extent feasible, vegetation clearing shall be conducted during the non-breeding season (i.e., September 16 to January 31) to minimize direct impacts on nesting birds. If vegetation clearing would be initiated during the breeding season for nesting birds/raptors (i.e., February 1–September 15), the construction activity shall be conducted in compliance with the applicable conditions set forth in the Migratory Bird Treaty Act.</p> <p>If vegetation clearing would be conducted during the breeding season (i.e., February 1–September 15), a pre-construction survey shall be conducted by a qualified Biologist (one with experience conducting nesting bird surveys) for nesting birds and/or raptors within three days prior to clearing of any vegetation or any work near existing structures. The nesting bird survey area shall include a buffer of 100 feet around the work area for nesting birds and a buffer of 500 feet around the work area for nesting raptors. If the Biologist does not find any active nests within or immediately adjacent to the impact area, the vegetation clearing/construction work shall be allowed to proceed and no further mitigation shall be required.</p> <p>If the Biologist finds an active nest within or immediately adjacent to the construction area and determines that the nest may be impacted or breeding activities substantially disrupted, the Biologist shall delineate an appropriate buffer zone (at a minimum of 25 feet) around the nest depending on the sensitivity of the species and the nature of the construction activity. Any nest found during survey efforts shall be mapped on the construction plans. The active nest shall be protected until nesting activity has ended. To protect any nest site, the following restrictions to construction activities shall be required until nests are no longer active, as determined by a qualified Biologist: (1) clearing limits shall be established within a protective buffer around any occupied nest (the protective buffer shall be 25–100 feet for nesting birds; 300–500 feet for special status bird species or nesting raptors), and (2) access and surveying shall be restricted within the established protective buffer of any occupied nest. Encroachment into the protective buffer around a known nest shall only be allowed if the Biologist determines that the proposed activity would not disturb the nest occupants. Protective buffers may be reduced if noise reduction measures (e.g., temporary noise barriers, sound blankets) are implemented to ensure that the raptor nest is not indirectly affected by construction noise, as determined by the qualified Biologist. Construction shall be allowed to proceed when the qualified Biologist has determined that fledglings have left the nest, or the nest has failed.</p> <p>MM BIO-7: A pre-construction roosting bat survey (including both day and evening efforts) shall be conducted by a qualified Biologist within two weeks prior to the initiation of construction within a specific work area to ensure that no active day-roosts would be significantly impacted. The day survey shall involve inspecting trees and xeric cliff faces within the relevant Project work area for sign of bat roosting. The evening survey shall involve monitoring each potential roost site for evening emergence, conducting exit counts, and acoustic monitoring (from a half an hour before sunset to at least one hour after sunset) near potential roosts. If active bat day-roosts occur within the relevant Project work area, bat exclusion devices shall be installed under the supervision of a qualified Biologist prior to the start of construction within the relevant Project work area.</p>	

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SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Impact Before Significance	Mitigation Measures	Level of Significance After Mitigation
		<p>If active bat day-roosts occur within xeric cliff faces, exclusionary measures, such as barriers with one-way doors or permanent exclusion (e.g., caulking or wire mesh), shall be installed under the supervision of a qualified Biologist.</p> <p>If active bat day-roosts occur within xeric cliff faces, exclusionary measures, such as barriers with one-way doors or permanent exclusion (e.g., caulking or wire mesh), shall be installed under the supervision of a qualified Biologist.</p> <p>If active bat day-roosts occur within trees proposed for removal, then the Property Owner/Developer shall elect to either (i) conduct the relevant tree removal between September and November (to avoid the bat maternity and the bat hibernation season), or (ii) proceed with the tree removal without any timing constraints but under the supervision of a qualified Biologist and utilizing phased tree trimming. Phased tree trimming consists of cutting off branches one day, and cutting down the stem(s) of a tree no sooner than 24 hours later. If avoidance of bat hibernation and bat maternity season is not feasible or if the Property Owner/Developer otherwise elects to proceed pursuant to option #2 above, then exclusionary measures, such as netting or phased tree trimming, shall be implemented after the evening roost emergence under the supervision of a qualified Biologist. Once bats have been excluded from the trees to be removed, then tree removal can proceed.</p> <p>MM BIO-8: To limit the amount of human disturbance in habitat areas of the Project Site that would not be developed (i.e., undisturbed areas to the west, south, and east of the Project footprint) during the Project's operation, the Property Owner/Developer shall prepare a fencing plan for review and approval by the City of Anaheim prior to issuance of a grading permit. The Project's permanent fencing shall be designed to deter the Project's residents (including their pets, horses, bicycles, and vehicles) from entering undeveloped portions of the Project Site, except along established roads and/or trails. The fencing plan shall specify the use of split-rail fencing to direct residents to keep out of sensitive habitat in undeveloped areas of the Project Site and shall include interpretive signage displaying the natural resources in the area (e.g., coastal California gnatcatcher, riparian areas, oak woodlands). Fencing shall be installed in accordance with the fencing plan prior to the issuance of an occupancy permit. Fencing shall be maintained in perpetuity by the Property Owner/Developer.</p> <p>Also, dogs shall be required to be kept on leash at all times while outdoors on the Project Site. The Property Owner/Developer shall post and maintain signage along the perimeter of the Project Site, between the Project's grading footprint and the undeveloped areas of the Project Site, stating that dogs are required to be leashed at all times when outdoors within the Project Site.</p> <p>MM BIO-9: During operation of the Project, anticoagulant rodenticides shall not be used anywhere within the Project Site. Specifications related to landscaping and maintenance of the Project's commercial and multiple-family exterior areas and landscaping shall prohibit the use of anticoagulant rodenticides (e.g., difenacoum, brodifacoum, bromadiolone difethialone, warfarin, chlorophaninone, and diphacinone).</p> <p>Prior to final building and zoning inspections, the Project Owner/Developer shall provide CC&Rs, reciprocal easements, or a similar document recorded on the property to the City for approval. To ensure ongoing compliance, the Community Codes and Regulations (CC&Rs) reciprocal easements, or a similar document recorded on the property for the single-family residential, commercial, and multiple-family residential uses shall prohibit the use of rodenticides in exterior and landscaping areas. Modifications to the CC&Rs shall also require City approval.</p> <p>MM BIO-10: To avoid and minimize the introduction and spread of invasive exotic plant species, the following measures shall be implemented.</p>	

**TABLE 1-1
SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Impact Before Significance	Mitigation Measures	Level of Significance After Mitigation
		<ul style="list-style-type: none"> • Minimize Introduction of Weed Seeds: Prior to issuance of a grading permit, the Property Owner/Develop shall demonstrate that Construction Plans include the following notes related to the introduction of weed seeds: (1) Construction vehicles (e.g., excavators, backhoes, dump trucks) shall be washed prior to delivery to the construction site to prevent weed seeds from entering the construction area in mud on the tires or undercarriage. (2) Track-clean or other methods of vehicle cleaning shall be used by the construction contractor to prevent weed seeds from entering/exiting the construction site on vehicles. (3) Wattles used for erosion control shall be biodegradable and certified as weed-free. These procedures shall be implemented throughout construction. • Minimize Introduction of Invasives in Landscaping: Prior to issuance of a building permit, the Property Owner/Developer shall submit the Landscaping Plans to the City of Anaheim for review and approval prior to issuance of a building permit. The City of Anaheim will review the landscaping plans along with a qualified Biologist under contract to the City. The City’s Biologist shall make suggestions for suitable substitutes if needed. <ul style="list-style-type: none"> ○ The review shall ensure that no invasive, exotic plant species are used in proposed landscaping and that suitable substitutes are proposed (i.e., those listed on the California Invasive Plant Council’s Invasive Plant Inventory with a Risk Rating of “High” [Cal-IPC 2023]). ○ To the extent practicable, the Project’s Landscaping Plans shall include transition zones in areas of the development that are adjacent to undeveloped areas (see Exhibit 4.3-7). The landscaping within these transition zone shall be designed to buffer adjacent natural habitats from human activity using native plantings (e.g., lemonade berry, western sycamore, coast live oak, etc.). Landscaping shall use plants native to the area from the Recommended Acceptable Fire Resistive Plant Species (Anaheim Fire & Rescue 2018). • C. Ongoing Compliance With Landscaping: Prior to final building and zoning inspections, the Project Owner/Developer shall provide CC&Rs, reciprocal easements, or a similar document recorded on the property to the City for approval. To ensure ongoing compliance, the CC&Rs, reciprocal easements, or a similar document recorded on the property for commercial, multiple-family, and residential lots shall prohibit the use of highly invasive species (i.e., those listed on the California Invasive Plant Council’s Invasive Plant Inventory with a Risk Rating of “High” [Cal-IPC 2023]). Modifications to the CC&Rs shall also require City approval. <p>MM BIO-11: The Property Owner/Developer shall submit lighting plan for the Project to the City of Anaheim for review and approval prior to issuance of a grading permit. The lighting plan shall provide the type and location of all proposed exterior lighting. All exterior lighting within the proposed development (i.e., exterior building lights, ground level landscaping lights, and lighting on the rooftop deck) and roadways (i.e., streetlights) shall be directed away from undeveloped portions of the Project Site (i.e., undeveloped areas to the west, south, and east of the Project footprint, see Exhibit 4.3-7). Specifically, exterior lighting that is installed along the western, southern, and eastern edges of the Project development shall be down-cast, diffused, shielded, low intensity, and located so that direct rays are confined to the permanently impacted portions of the Project Site. The lighting plan shall demonstrate that lighting levels will not increase lighting levels more than 0.5-foot-candle over ambient conditions at the Project’s edge (i.e., where the buildings, roadways, landscaping, and lighting structures end) adjacent to undeveloped areas to the west, south, and east of the Project.</p> <p>Prior to final building and zoning inspections, the Project Owner/Developer shall provide CC&Rs, reciprocal easements, or a similar document recorded on the property to the City for approval. To ensure ongoing compliance, this exterior lighting requirement shall be included as a mandatory requirement for future owners and occupants in the CC&Rs, reciprocal easements, or a similar document recorded on the property, for commercial, multiple-family, and single-family residential lots. Modifications to the CC&Rs shall also require City approval.</p>	

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SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Impact Before Significance	Mitigation Measures	Level of Significance After Mitigation
		<p>MM BIO-12: Prior to issuance of a building permit, the Property Owner/Developer shall submit the Project’s plans for to the City of Anaheim for review and approval that demonstrates that window/glass designs for the multiple-family residential building, commercial buildings, perimeter fencing, and exterior landscaping minimizes bird strikes. This may include minimization measures such as the use of bird-safe glass or through the angling of windows/glass downward so that the windows reflect the ground instead of the surrounding habitat or sky. The American Bird Conservancy has established the “2 X 4 Rule”, which describes the distance between elements making up a pattern applied to windows for the purpose of preventing bird strikes. To be effective, the pattern must uniformly cover the entire window and consist of elements of any shape (e.g., lines, dots, other geometric figures) separated by no more than 2 inches if oriented in horizontal rows, or 4 inches if oriented in vertical columns (i.e., the 2 X 4 Rule). These patterns reduce bird-window collisions when applied to the outer surface of reflective panes. Greater spacing between pattern elements increases the risk of a strike and casualties. Bird-safe glass may include a uniformly dense dot, striped, or grid pattern created as ceramic frit on the external surface of the window or a uniformly dense dot, striped, or grid patterns of clear UV-reflecting and UV-absorbing film applied to the exterior of windows. It should be noted that single decals (e.g., falcon silhouettes or large eye patterns) are ineffective and shall not be used unless the entire glass surface is uniformly covered with the objects or patterns (Klem 1990).</p> <p>MM BIO-13 A Worker Environmental Awareness Program Training and biological monitoring will be implemented during the Project’s construction as detailed below.</p> <ul style="list-style-type: none"> • Biological Monitoring: Prior to issuance of a grading permit, the Property Owner/Developer shall hire a qualified Biologist or Biologists to oversee implementation of the mitigation program and regulatory permit conditions during construction. The qualified Biologist(s) shall be approved by the City, CDFW, and USFWS. Prior to the initiation of construction, a qualified Biologist shall ensure that the Project limits are clearly staked. A qualified Biologist shall be present during all vegetation clearing activities. A qualified Biologist shall ensure that construction and personal vehicles will be parked in designated areas and that smoking shall be limited to designated areas with appropriate containers for disposal of cigarette butts. • B. Worker Environmental Awareness Program (WEAP) Training: Prior to the issuance of a grading permit, and for each subsequent phase of construction, a qualified Biologist shall provide a Worker Environmental Awareness Program (WEAP) training for construction personnel to review the mitigation measures and permit requirements applicable to construction. The training shall cover: Threatened, Endangered, and other special status species that occur immediately adjacent to the construction area; the Project’s location within a NCCP/HCP Existing Use area; consequences for violating the federal/State Endangered Species Acts and the Migratory Bird Treaty Act; risk of igniting fires adjacent to wildlands; leaving wildlife unharmed; applicable mitigation measures and permit conditions; and contact information for the Designated Biologist and the City of Anaheim. At the completion of each training, the Designated Biologist shall have trained personnel sign the WEAP Log to document that they have been trained and understand the mitigation measures and permit conditions. The WEAP training shall be repeated, as-needed, for new construction personnel; all construction staff members shall be trained within one week of beginning work on the Project. 	
<p>b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service.</p>	<p>Significant Impact</p>	<p>MM BIO-1: The Property Owner/Developer shall mitigate for impacts to coastal sage scrub and coastal California gnatcatcher prior to the issuance of a grading permit through one or a combination of the following options, as elected by the Project Owner/Developer and approved by the USFWS and CDFW: (1) payment of the NCCP/HCP mitigation fee (only if allowed by the USFWS and CDFW because the Project is within an Existing Use area); (2) long-term preservation of existing coastal sage scrub habitat occupied by coastal California gnatcatchers at an on-site or off-site location; and/or (3) restoration of coastal sage scrub habitat at an on-</p>	<p>Less Than Significant With Mitigation Incorporated</p>

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Threshold of Significance	Impact Before Significance	Mitigation Measures	Level of Significance After Mitigation
		<p>site or off-site location. Coastal sage scrub shall be replaced at a minimum 1:1 ratio, or as otherwise determined by the USFWS and CDFW.</p> <p>Prior to the issuance of a grading permit, the Property Owner/Developer shall obtain a Biological Opinion from the USFWS describing the mitigation requirements. If the mitigation fee option is allowed, the Property Owner/Developer shall pay the mitigation fee (calculated based on the above-referenced ratio) to the NCCP Non-profit Corporation for the replacement of impacted coastal sage scrub resources prior to the issuance of a grading permit. If the preservation option is selected, a Long Term Protection and Management Plan (LTPMP) shall be prepared by a qualified Restoration Ecologist and shall be reviewed and approved by the USFWS and CDFW prior to the issuance of a grading permit. If the option of restoration of coastal sage scrub habitat is selected, a Habitat Mitigation and Monitoring Program (HMMP) shall be prepared by a qualified Restoration Ecologist and reviewed and approved by the USFWS and CDFW prior to the issuance of a grading permit. If either options #2 or #3 are selected, the Property Owner/Developer shall be responsible for implementing either the LTPMP and/or HMMP and ensuring that the mitigation program achieves the approved performance criteria. If either options #2 or #3 are selected, the Property Owner/Developer shall implement the LTPMP or HMMP per its specified requirements, materials, methods, and performance criteria.</p> <p>If option #3 is selected, the HMMP shall include the following items:</p> <ul style="list-style-type: none"> • Responsibilities and Qualifications. The responsibilities and qualifications of the Property Owner/Developer, ecological specialists, and restoration (landscape) contracting personnel who shall implement the plan shall be specified. At a minimum, the HMMP shall specify that the ecological specialists and contractors have performed successful installation and long-term monitoring and maintenance of Southern California native habitat mitigation/restoration programs. A successful program shall be defined as one that has been signed off on by the resource agencies. • Performance Criteria. Mitigation performance criteria to be specified in the HMMP shall conform to the resource agency permit conditions. The HMMP shall state that the use of the mitigation site(s) by special status wildlife species (e.g., coastal California gnatcatcher), though not a requirement for site success, would be regarded by the resource agencies as a significant factor in considering eligibility for program sign-off. • Site Selection. The mitigation site(s) shall be determined in coordination with the Property Owner/Developer and the resource agencies. To maximize the value of the habitat provided, the site(s) shall be contiguous to other permanently preserved parcels. The soils and other physical characteristics of the potential mitigation site(s) shall be analyzed to ensure that proper conditions exist for the establishment of coastal sage scrub habitat. • Seed Materials Procurement. At least one year prior to mitigation implementation, the Property Owner/Developer or its consultants/contractors shall initiate collection of the native seed materials specified in the HMMP. All seed mixes shall be of local origin (i.e., collected within 20 miles, and within the same watershed, as the selected restoration/enhancement site), to ensure genetic integrity. No seed materials of unknown or non-local geographic origin shall be used. Seed collection shall be prioritized per habitat area, in the following order: (a) Project impact areas (highest priority); (b) other on-site habitat areas; and (c) off-site habitat areas (lowest priority), assuming availability of seed species in multiple locations. • Wildlife Surveys and Protection. The HMMP shall specify any wildlife surveys (i.e., nesting bird surveys, focused/protocol surveys for special status species [e.g., coastal California gnatcatcher]) and biological monitoring that are required to avoid significant adverse impacts to wildlife species during the performance of mitigation site preparation, installation, or maintenance tasks. The 	

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		<p>HMMP shall also describe potential restrictions on these tasks due to special status wildlife conditions on the mitigation site(s) (e.g., suspension of these tasks during the nesting bird season).</p> <ul style="list-style-type: none"> • Site Preparation and Plant Materials Installation. Mitigation site preparation shall include all of the following: (a) protection of existing native species and habitats (including compliance with applicable seasonal restrictions, if any); (b) installation of protective fencing and/or signage (as needed); (c) initial trash and weed removal (outside the nesting bird season) and methods; (d) soil treatments, as needed (i.e., imprinting, de-compacting); (e) installation of erosion-control measures (i.e., fully natural/bio-degradable [not “photo-degradable” plastic mesh] fiber roll); (f) application of salvaged native plant materials (i.e., coarse woody debris), as available and supervised by a biological monitor; (g) temporary irrigation installation; (h) a minimum one-year preliminary weed abatement program (prior to the installation of native plant and seed materials)—including specification of approved herbicides; (i) planting of container plant and cutting species; and (j) seed mix application. • Schedule. An implementation schedule shall be developed that includes planting and seeding to occur in the fall and winter (i.e., between November 1 and January 31) and the frequency of long-term maintenance and monitoring activities (including the dates of annual quantitative surveys, as described below) for five years or until the mitigation program achieves the approved performance criteria and has been released from maintenance requirements by the resource agencies. • Maintenance Program. The Maintenance Program shall include (a) protection of existing native species and habitats (including compliance with applicable seasonal restrictions, if any); (b) maintenance of protective fencing and/or signage; (c) trash and weed removal—including specification of approved herbicides; (d) maintenance of erosion-control measures; (e) inspection/repairs of irrigation components; (f) replacement of dead container plant and cuttings (as needed); (g) application of remedial seed mixes (as needed); (h) herbivory control; and (i) removal of all non-vegetative materials (i.e., fencing, signage, irrigation components) upon Project completion. The mitigation site(s) shall be maintained for a period of five years to ensure successful coastal sage scrub habitat establishment within the restored/enhanced sites; however, the Property Owner/Developer may request to be released from maintenance requirements by the resource agencies prior to five years if the mitigation program has achieved all performance criteria. • Monitoring Program. The Monitoring Program shall include (a) qualitative monitoring (i.e., general habitat conditions, photo-documentation from established photo stations); (b) quantitative monitoring; (c) annual monitoring reports, which shall be submitted to the Property Owner/Developer and the resource agencies for five years following implementation of site preparation and plant materials installation activities; and (d) wildlife surveys and monitoring as described above. The annual monitoring reports shall include a detailed discussion of mitigation site performance (e.g., measured vegetation coverage and diversity) and compliance with required performance criteria, a discussion of wildlife species’ use of the restored and/or enhanced habitat area(s), and a list of proposed remedial measures to address noncompliance (if any) with any performance criteria. The site(s) shall be monitored for five years following completion of site preparation and plant materials installation activities or until the Property Owner/Developer has been released from maintenance requirements by the resource agencies. • Long-term preservation. Long-term preservation of the mitigation site(s) shall be outlined in the HMMP to ensure that the mitigation site(s) are not impacted by future development. <p>The NCCP/HCP requires the following construction-related measures by implemented during construction:</p> <ul style="list-style-type: none"> • To the maximum extent practicable, no grading of coastal sage scrub habitat that is occupied by nesting gnatcatchers shall occur during the breeding season (i.e., February 15 through July 15). It 	

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		<p>is expressly understood that this provision and the remaining provisions of these “construction-related minimization measures,” are subject to public health and safety considerations. These considerations include unexpected slope stabilization, erosion control measures, and emergency facility repairs. In the event of such public health and safety circumstances, the Property Owner/Developer shall provide USFWS/CDFW with the maximum practicable notice (or such notice as is specified in the NCCP/HCP) to allow for capture of gnatcatchers, cactus wrens, and any other coastal sage scrub Covered Species that are not otherwise flushed and shall carry out the following measures only to the extent as practicable in the context of the public health and safety considerations.</p> <ul style="list-style-type: none"> • Prior to the commencement of grading operations or other activities involving significant soil disturbance, all areas of coastal sage scrub habitat to be avoided under the provisions of the NCCP/HCP, shall be identified with temporary fencing or other markers clearly visible to construction personnel. Additionally, prior to the commencement of grading operations or other activities involving disturbance of coastal sage scrub, a survey shall be conducted to locate gnatcatchers and cactus wrens within 100 feet of the outer extent of projected soil disturbance activities and the locations of any such species shall be clearly marked and identified on the construction/grading plans. • A monitoring biologist, acceptable to USFWS/CDFW shall be onsite during any clearing of coastal sage scrub. The Property Owner/Developer shall advise USFWS/CDFW at least 7 calendar days prior to the clearing of any habitat occupied by Covered Species to allow USFWS/CDFW to work with the monitoring biologist in connection with bird flushing capture activities. The monitoring biologist shall flush Covered Species (avian or other mobile Covered Species) from occupied habitat areas immediately prior to brush-clearing and earth-moving activities. If birds cannot be flushed, they shall be captured in mist nets, if feasible, and relocated to areas of the site(s) to be protected or to the NCCP/HCP Reserve System. It shall be the responsibility of the monitoring biologist to assure that Covered Bird Species shall not be directly impacted by brush-clearing and earth-moving equipment in a manner that also allows for construction activities on a timely basis. • Following the completion of initial grading/earth movement activities, all areas of coastal sage scrub habitat to be avoided by construction equipment and personnel shall be marked with temporary fencing or other appropriate markers clearly visible to construction personnel. No construction access, parking, or storage of equipment shall be permitted within such marked areas. • In areas bordering the NCCP Reserve System containing significant coastal sage scrub identified in the NCCP/HCP for protection, vehicle transportation routes between cut-and-fill locations shall be restricted to a minimum number during construction consistent with Project construction requirements. Waste dirt or rubble shall not be deposited on adjacent coastal sage scrub identified in the NCCP/HCP for protection. Pre-construction meetings involving the monitoring biologist, construction supervisors, and equipment operators shall be conducted and documented to ensure maximum practicable adherence to these measures. • Coastal sage scrub identified in the NCCP/HCP for protection and located within the likely dust drift radius of construction areas shall be periodically sprayed with water to reduce accumulated dust on the leaves as recommended by the monitoring biologist. <p>MM BIO-2: The Property Owner/Developer shall mitigate for impacts to chaparral vegetation (i.e., toyon-sumac chaparral and toyon-sumac chaparral/ruderal) prior to issuance of a grading permit through one or a combination of the following options, as elected by the Project Owner/Developer and as approved by the City of Anaheim: (1) payment of the adopted applicable in-lieu mitigation fee to an approved mitigation bank; (2) long-term preservation of existing chaparral habitat at an on-site or off-site location; and/or (3) restoration of chaparral habitat at an on-site or off-site location. Toyon-sumac chaparral shall be replaced at a minimum 1:1 ratio and toyon-sumac chaparral/ruderal shall be replaced at a minimum 0.5:1 ratio. The</p>	

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		<p>option selected by the Project Owner/Developer shall be approved by the City of Anaheim prior to issuance of a grading permit.</p> <p>If the in-lieu mitigation fee option is selected, the Property Owner/Developer shall pay the mitigation fee (calculated based on the above-referenced ratio) to the mitigation bank for the replacement of impacted chaparral resources prior to the issuance of a grading permit. If the preservation option is selected, a LTPMP shall be prepared by a qualified Restoration Ecologist for review and approval by the City of Anaheim prior to issuance of a grading permit. If appropriate, the LTPMP may be combined with the coastal sage scrub LTPMP (described under MM BIO-1). If the option of restoration of chaparral habitat is selected, a HMMP shall be prepared by a qualified Restoration Ecologist for review and approval by the City of Anaheim prior to the issuance of a grading permit. If appropriate, the HMMP may be combined with the coastal sage scrub HMMP (described under MM BIO-1). If either options #2 or #3 are selected, the Property Owner/Developer shall be responsible for implementing either the LTPMP or HMMP and ensuring that the mitigation program achieves the approved performance criteria. The Property Owner/Developer shall implement the LTPMP or HMMP per its specified requirements, materials, methods, and performance criteria.</p> <p>If selected, the HMMP shall include the following items:</p> <ul style="list-style-type: none"> • Responsibilities and Qualifications. The responsibilities and qualifications of the Property Owner/Developer, ecological specialists, and restoration (landscape) contracting personnel who shall implement the plan shall be specified. At a minimum, the HMMP shall specify that the ecological specialists and contractors have performed successful installation and long-term monitoring and maintenance of Southern California native habitat mitigation/restoration programs. A successful program shall be defined as one that has been signed off on by the City of Anaheim. • Performance Criteria. Mitigation performance criteria to be specified in the HMMP shall conform to the mitigation requirements. The HMMP shall state that the use of the mitigation site(s) by special status wildlife species, though not a requirement for site success, would be regarded by the City of Anaheim as a significant factor in considering eligibility for program sign-off. • Site Selection. The mitigation site(s) shall be determined in coordination with the Property Owner/Developer and the City. To maximize the value of the habitat provided, the site(s) shall be contiguous to other permanently preserved parcels. The soils and other physical characteristics of the potential mitigation site(s) shall be analyzed to ensure that proper conditions exist for the establishment of chaparral habitat. • Seed Materials Procurement. At least one year prior to mitigation implementation, the Property Owner/Developer or its consultants/contractors shall initiate collection of the native seed materials specified in the HMMP. All seed mixes shall be of local origin (i.e., collected within 20 miles, and within the same watershed, as the selected restoration/enhancement site), to ensure genetic integrity. No seed materials of unknown or non-local geographic origin shall be used. Seed collection shall be prioritized per habitat area, in the following order: (a) Project impact areas (highest priority); (b) other on-site habitat areas; and (c) off-site habitat areas (lowest priority), assuming availability of seed species in multiple locations. • Wildlife Surveys and Protection. The HMMP shall specify any wildlife surveys (i.e., nesting bird surveys, focused/protocol surveys for special status species) and biological monitoring that are required to avoid significant adverse impacts to wildlife species during the performance of mitigation site preparation, installation, or maintenance tasks. The HMMP shall also describe potential restrictions on these tasks due to special status wildlife conditions on the mitigation site(s) (e.g., suspension of these tasks during the nesting bird season). 	

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		<ul style="list-style-type: none"> • Site Preparation and Plant Materials Installation. Mitigation site preparation shall include all of the following: (a) protection of existing native species and habitats (including compliance with applicable seasonal restrictions, if any); (b) installation of protective fencing and/or signage (as needed); (c) initial trash and weed removal (outside the nesting bird season) and methods; (d) soil treatments, as needed (i.e., imprinting, de-compacting); (e) installation of erosion-control measures (i.e., fully natural/bio-degradable [not “photo-degradable” plastic mesh] fiber roll); (f) application of salvaged native plant materials (i.e., coarse woody debris), as available and supervised by a biological monitor; (g) temporary irrigation installation; (h) a minimum one-year preliminary weed abatement program (prior to the installation of native plant and seed materials)—including specification of approved herbicides; (i) planting of container plant and cutting species; and (j) seed mix application. • Schedule. An implementation schedule shall be developed that includes planting and seeding to occur in the fall and winter (i.e., between November 1 and January 31) and the frequency of long-term maintenance and monitoring activities (including the dates of annual quantitative surveys, as described below) for five years or until the mitigation program achieves the approved performance criteria and has been released from maintenance requirements by the resource agencies. • Maintenance Program. The Maintenance Program shall include (a) protection of existing native species and habitats (including compliance with seasonal restrictions, if any); (b) maintenance of protective fencing and/or signage; (c) trash and weed removal—including specification of approved herbicides; (d) maintenance of erosion-control measures; (e) inspection/repairs of irrigation components; (f) replacement of dead container plant and cuttings (as needed); (g) application of remedial seed mixes (as needed); (h) herbivory control; and (i) removal of all non-vegetative materials (i.e., fencing, signage, irrigation components) following implementation of site preparation and plant materials installation activities. The mitigation site(s) shall be maintained for a period of five years to ensure successful coastal sage scrub habitat establishment within the restored/enhanced site(s); however, the Property Owner/Developer may request to be released from maintenance requirements by the resource agencies prior to five years if the mitigation program has achieved all performance criteria. • Monitoring Program. The Monitoring Program shall include (a) qualitative monitoring (i.e., general habitat conditions, photo-documentation from established photo stations); (b) quantitative monitoring; (c) annual monitoring reports, which shall be submitted to the Property Owner/Developer and the resource agencies for five years following implementation of site preparation and plant materials installation activities; and (d) wildlife surveys and monitoring as described above. The annual monitoring reports shall include a detailed discussion of mitigation site performance (e.g., measured vegetation coverage and diversity) and compliance with required performance criteria, a discussion of wildlife species’ use of the restored and/or enhanced habitat area(s), and a list of proposed remedial measures to address noncompliance (if any) with any performance criteria. The site(s) shall be monitored for five years following completion of site preparation and plant materials installation activities or until the Property Owner/Developer has been released from maintenance requirements by the resource agencies. • Long-term preservation. Long-term preservation of the mitigation site(s) shall be outlined in the HMMP to ensure that the mitigation site(s) are not impacted by future development. <p>MM BIO-3: Prior to initiation of relevant Project construction activities, the Property Owner/Developer shall obtain all necessary permits that are required under applicable laws and regulations for impacts to CDFW and RWQCB jurisdictional areas. Potential mitigation options shall include one or both of the following, as approved by CDFW and RWQCB: (1) payment of an in-lieu mitigation fee to an approved mitigation bank; (2) long-term preservation of existing riparian habitat at an on-site or off-site location; or (3) restoration of riparian</p>	

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SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Impact Before Significance	Mitigation Measures	Level of Significance After Mitigation
		<p>habitat at an on-site or off-site location. Riparian habitat/jurisdictional areas shall be replaced at a minimum 1:1 ratio, or as otherwise determined by the resource agencies.</p> <p>If the in-lieu mitigation fee option is selected by the Property Owner/Developer, the Property Owner/Developer shall pay the applicable mitigation fee (calculated based on the above-referenced ratio) to the mitigation bank for the replacement of impacted riparian resources prior to the initiation of the relevant Project construction activities. If the preservation option is selected, a LTPMP shall be prepared by a qualified Restoration Ecologist for review and approval by the CDFW and RWQCB; if appropriate, the LTPMP may be combined with the coastal sage scrub LTPMP (described under MM BIO-1). If restoration of riparian habitat is selected, a HMMP shall be prepared by a qualified Restoration Ecologist for review and approval by the CDFW and RWQCB; if appropriate, the HMMP may be combined with the coastal sage scrub HMMP (described under MM BIO-1). If options #2 or 3 are selected, the Property Owner/Developer shall be responsible for implementing either the LTPMP or HMMP and ensuring that the mitigation program achieves the approved performance criteria. If options #2 or 3 are selected, the Property Owner/Developer shall implement the LTPMP or HMMP per its specified requirements, materials, methods, and performance criteria.</p> <p>The HMMP shall include the following items:</p> <ul style="list-style-type: none"> • Responsibilities and Qualifications. The responsibilities and qualifications of the Property Owner/Developer, ecological specialists, and restoration (landscape) contracting personnel who shall implement the plan shall be specified. At a minimum, the HMMP shall specify that the ecological specialists and contractors have performed successful installation and long-term monitoring and maintenance of Southern California native habitat mitigation/restoration programs, implemented under USACE, CDFW, and RWQCB permit conditions. A successful program shall be defined as one that has been signed off on by the resource agencies. • Performance Criteria. Mitigation performance criteria to be specified in the HMMP shall conform to the resource agency permit conditions. The HMMP shall state that the use of the mitigation site(s) by special status wildlife species (e.g., least Bell's vireo), though not a requirement for site success, would be regarded by the resource agencies as a significant factor in considering eligibility for program sign-off. • Site Selection. The mitigation site(s) shall be determined in coordination with the Property Owner/Developer and the resource agencies. To maximize the value of the habitat provided, the site(s) shall be contiguous to other permanently preserved parcels. The soils, hydrology/hydraulics, and other physical characteristics of the potential mitigation site(s) shall be analyzed to ensure that proper conditions exist for the establishment of riparian habitat. • Seed Materials Procurement. At least one year prior to mitigation implementation, the Property Owner/Developer or its consultants/contractors shall initiate collection of the native seed materials specified in the HMMP. All seed mixes shall be of local origin; i.e., collected within 20 miles, and within the same watershed, as the selected restoration/enhancement site(s), to ensure genetic integrity. No seed materials of unknown or non-local geographic origin shall be used. Seed collection shall be prioritized per habitat area, in the following order: (a) project impact areas (highest priority); (b) other on-site habitat areas; and (c) off-site habitat areas (lowest priority), assuming availability of seed species in multiple locations. • Wildlife Surveys and Protection. The HMMP shall specify any wildlife surveys (i.e., nesting bird surveys, focused/protocol surveys for special status species [e.g., least Bell's vireo]) and biological monitoring that are required to avoid significant adverse impacts to wildlife species during the performance of mitigation site preparation, installation, or maintenance tasks. The HMMP shall also describe potential restrictions on these tasks due to special status wildlife conditions on the 	

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Threshold of Significance	Impact Before Significance	Mitigation Measures	Level of Significance After Mitigation
		<p>mitigation site(s) (e.g., suspension of these tasks during the nesting bird season, as defined in project permits).</p> <ul style="list-style-type: none"> • Site Preparation and Plant Materials Installation. Mitigation site preparation shall include all of the following: (a) protection of existing native species and habitats (including compliance with applicable seasonal restrictions, if any); (b) installation of protective fencing and/or signage (as needed); (c) initial trash and weed removal (outside the nesting bird season) and methods; (d) soil treatments, as needed (i.e., imprinting, de-compacting); (e) installation of erosion-control measures (i.e., fully natural/bio-degradable [not “photo-degradable” plastic mesh] fiber roll); (f) application of salvaged native plant materials (i.e., coarse woody debris), as available and supervised by a biological monitor; (g) temporary irrigation installation; (h) a minimum one-year preliminary weed abatement program (prior to the installation of native plant and seed materials)—including specification of approved herbicides; (i) planting of container plant and cutting species; and (j) seed mix application. • Schedule. An implementation schedule shall be developed that includes planting and seeding to occur in the fall and winter (i.e., between November 1 and January 31) and the frequency of long-term maintenance and monitoring activities (including the dates of annual quantitative surveys, as described below) for five years or until the mitigation program achieves the approved performance criteria and has been released from maintenance requirements by the resource agencies. • Maintenance Program. The Maintenance Program shall include (a) protection of existing native species and habitats (including compliance with applicable seasonal restrictions, if any); (b) maintenance of protective fencing and/or signage; (c) trash and weed removal—including specification of approved herbicides; (d) maintenance of erosion-control measures; (e) inspection/repairs of irrigation components; (f) replacement of dead container plant and cuttings (as needed); (g) application of remedial seed mixes (as needed); (h) herbivory control; and (i) removal of all non-vegetative materials (i.e., fencing, signage, irrigation components) following implementation of site preparation and plant materials installation activities. The mitigation site(s) shall be maintained for a period of five years to ensure successful riparian habitat establishment within the restored/enhanced sites; however, the Property Owner/Developer may request to be released from maintenance requirements by the resource agencies prior to five years if the mitigation program has achieved all performance criteria. • Monitoring Program. The Monitoring Program shall include (a) qualitative monitoring (i.e., general habitat conditions, photo-documentation from established photo stations); (b) quantitative monitoring; (c) annual monitoring reports, which shall be submitted to the Property Owner/Developer and the resource agencies for five years following implementation of site preparation and plant materials installation activities; and (d) wildlife surveys and monitoring as described above. The annual monitoring reports shall include a detailed discussion of mitigation site performance (e.g., measured vegetation coverage and diversity) and compliance with required performance criteria, a discussion of wildlife species’ use of the restored and/or enhanced habitat area(s), and a list of proposed remedial measures to address noncompliance with any performance criteria. The site(s) shall be monitored for five years or until the Property Owner/Developer has been released from maintenance requirements by the resource agencies. • Long-term preservation. Long-term preservation of the mitigation site(s) shall be outlined in the HMMP to ensure that the mitigation sites are not impacted by future development. 	
<p>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.</p>	<p>Significant Impact</p>	<p>MM BIO-3: Prior to initiation of relevant Project construction activities, the Property Owner/Developer shall obtain all necessary permits that are required under applicable laws and regulations for impacts to CDFW and RWQCB jurisdictional areas. Potential mitigation options shall include one or both of the following, as approved by CDFW and RWQCB: (1) payment of an in-lieu mitigation fee to an approved mitigation bank; (2) long-term preservation of existing riparian habitat at an on-site or off-site location; or (3) restoration of riparian</p>	<p>Less Than Significant With Mitigation Incorporated</p>

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		<p>habitat at an on-site or off-site location. Riparian habitat/jurisdictional areas shall be replaced at a minimum 1:1 ratio, or as otherwise determined by the resource agencies.</p> <p>If the in-lieu mitigation fee option is selected by the Property Owner/Developer, the Property Owner/Developer shall pay the applicable mitigation fee (calculated based on the above-referenced ratio) to the mitigation bank for the replacement of impacted riparian resources prior to the initiation of the relevant Project construction activities. If the preservation option is selected, a LTPMP shall be prepared by a qualified Restoration Ecologist for review and approval by the CDFW and RWQCB; if appropriate, the LTPMP may be combined with the coastal sage scrub LTPMP (described under MM BIO-1). If restoration of riparian habitat is selected, a HMMP shall be prepared by a qualified Restoration Ecologist for review and approval by the CDFW and RWQCB; if appropriate, the HMMP may be combined with the coastal sage scrub HMMP (described under MM BIO-1). If options #2 or 3 are selected, the Property Owner/Developer shall be responsible for implementing either the LTPMP or HMMP and ensuring that the mitigation program achieves the approved performance criteria. If options #2 or 3 are selected, the Property Owner/Developer shall implement the LTPMP or HMMP per its specified requirements, materials, methods, and performance criteria.</p> <p>The HMMP shall include the following items:</p> <ul style="list-style-type: none"> • Responsibilities and Qualifications. The responsibilities and qualifications of the Property Owner/Developer, ecological specialists, and restoration (landscape) contracting personnel who shall implement the plan shall be specified. At a minimum, the HMMP shall specify that the ecological specialists and contractors have performed successful installation and long-term monitoring and maintenance of Southern California native habitat mitigation/restoration programs, implemented under USACE, CDFW, and RWQCB permit conditions. A successful program shall be defined as one that has been signed off on by the resource agencies. • Performance Criteria. Mitigation performance criteria to be specified in the HMMP shall conform to the resource agency permit conditions. The HMMP shall state that the use of the mitigation site(s) by special status wildlife species (e.g., least Bell's vireo), though not a requirement for site success, would be regarded by the resource agencies as a significant factor in considering eligibility for program sign-off. • Site Selection. The mitigation site(s) shall be determined in coordination with the Property Owner/Developer and the resource agencies. To maximize the value of the habitat provided, the site(s) shall be contiguous to other permanently preserved parcels. The soils, hydrology/hydraulics, and other physical characteristics of the potential mitigation site(s) shall be analyzed to ensure that proper conditions exist for the establishment of riparian habitat. • Seed Materials Procurement. At least one year prior to mitigation implementation, the Property Owner/Developer or its consultants/contractors shall initiate collection of the native seed materials specified in the HMMP. All seed mixes shall be of local origin; i.e., collected within 20 miles, and within the same watershed, as the selected restoration/enhancement site(s), to ensure genetic integrity. No seed materials of unknown or non-local geographic origin shall be used. Seed collection shall be prioritized per habitat area, in the following order: (a) project impact areas (highest priority); (b) other on-site habitat areas; and (c) off-site habitat areas (lowest priority), assuming availability of seed species in multiple locations. • Wildlife Surveys and Protection. The HMMP shall specify any wildlife surveys (i.e., nesting bird surveys, focused/protocol surveys for special status species [e.g., least Bell's vireo]) and biological monitoring that are required to avoid significant adverse impacts to wildlife species during the performance of mitigation site preparation, installation, or maintenance tasks. The HMMP shall also describe potential restrictions on these tasks due to special status wildlife conditions on the 	

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		<p>mitigation site(s) (e.g., suspension of these tasks during the nesting bird season, as defined in project permits).</p> <ul style="list-style-type: none"> • Site Preparation and Plant Materials Installation. Mitigation site preparation shall include all of the following: (a) protection of existing native species and habitats (including compliance with applicable seasonal restrictions, if any); (b) installation of protective fencing and/or signage (as needed); (c) initial trash and weed removal (outside the nesting bird season) and methods; (d) soil treatments, as needed (i.e., imprinting, de-compacting); (e) installation of erosion-control measures (i.e., fully natural/bio-degradable [not “photo-degradable” plastic mesh] fiber roll); (f) application of salvaged native plant materials (i.e., coarse woody debris), as available and supervised by a biological monitor; (g) temporary irrigation installation; (h) a minimum one-year preliminary weed abatement program (prior to the installation of native plant and seed materials)—including specification of approved herbicides; (i) planting of container plant and cutting species; and (j) seed mix application. • Schedule. An implementation schedule shall be developed that includes planting and seeding to occur in the fall and winter (i.e., between November 1 and January 31) and the frequency of long-term maintenance and monitoring activities (including the dates of annual quantitative surveys, as described below) for five years or until the mitigation program achieves the approved performance criteria and has been released from maintenance requirements by the resource agencies. • Maintenance Program. The Maintenance Program shall include (a) protection of existing native species and habitats (including compliance with applicable seasonal restrictions, if any); (b) maintenance of protective fencing and/or signage; (c) trash and weed removal—including specification of approved herbicides; (d) maintenance of erosion-control measures; (e) inspection/repairs of irrigation components; (f) replacement of dead container plant and cuttings (as needed); (g) application of remedial seed mixes (as needed); (h) herbivory control; and (i) removal of all non-vegetative materials (i.e., fencing, signage, irrigation components) following implementation of site preparation and plant materials installation activities. The mitigation site(s) shall be maintained for a period of five years to ensure successful riparian habitat establishment within the restored/enhanced sites; however, the Property Owner/Developer may request to be released from maintenance requirements by the resource agencies prior to five years if the mitigation program has achieved all performance criteria. • Monitoring Program. The Monitoring Program shall include (a) qualitative monitoring (i.e., general habitat conditions, photo-documentation from established photo stations); (b) quantitative monitoring; (c) annual monitoring reports, which shall be submitted to the Property Owner/Developer and the resource agencies for five years following implementation of site preparation and plant materials installation activities; and (d) wildlife surveys and monitoring as described above. The annual monitoring reports shall include a detailed discussion of mitigation site performance (e.g., measured vegetation coverage and diversity) and compliance with required performance criteria, a discussion of wildlife species’ use of the restored and/or enhanced habitat area(s), and a list of proposed remedial measures to address noncompliance with any performance criteria. The site(s) shall be monitored for five years or until the Property Owner/Developer has been released from maintenance requirements by the resource agencies. • Long-term preservation. Long-term preservation of the mitigation site(s) shall be outlined in the HMMP to ensure that the mitigation sites are not impacted by future development. 	
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.	Significant Impact	MM BIO-6: To the extent feasible, vegetation clearing shall be conducted during the non-breeding season (i.e., September 16 to January 31) to minimize direct impacts on nesting birds. If vegetation clearing would be initiated during the breeding season for nesting birds/raptors (i.e., February 1–September 15), the	Less Than Significant With Mitigation Incorporated

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		<p>construction activity shall be conducted in compliance with the applicable conditions set forth in the Migratory Bird Treaty Act.</p> <p>If vegetation clearing would be conducted during the breeding season (i.e., February 1–September 15), a pre-construction survey shall be conducted by a qualified Biologist (one with experience conducting nesting bird surveys) for nesting birds and/or raptors within three days prior to clearing of any vegetation or any work near existing structures. The nesting bird survey area shall include a buffer of 100 feet around the work area for nesting birds and a buffer of 500 feet around the work area for nesting raptors. If the Biologist does not find any active nests within or immediately adjacent to the impact area, the vegetation clearing/construction work shall be allowed to proceed and no further mitigation shall be required.</p> <p>If the Biologist finds an active nest within or immediately adjacent to the construction area and determines that the nest may be impacted or breeding activities substantially disrupted, the Biologist shall delineate an appropriate buffer zone (at a minimum of 25 feet) around the nest depending on the sensitivity of the species and the nature of the construction activity. Any nest found during survey efforts shall be mapped on the construction plans. The active nest shall be protected until nesting activity has ended. To protect any nest site, the following restrictions to construction activities shall be required until nests are no longer active, as determined by a qualified Biologist: (1) clearing limits shall be established within a protective buffer around any occupied nest (the protective buffer shall be 25–100 feet for nesting birds; 300–500 feet for special status bird species or nesting raptors), and (2) access and surveying shall be restricted within the established protective buffer of any occupied nest. Encroachment into the protective buffer around a known nest shall only be allowed if the Biologist determines that the proposed activity would not disturb the nest occupants. Protective buffers may be reduced if noise reduction measures (e.g., temporary noise barriers, sound blankets) are implemented to ensure that the raptor nest is not indirectly affected by construction noise, as determined by the qualified Biologist. Construction shall be allowed to proceed when the qualified Biologist has determined that fledglings have left the nest, or the nest has failed.</p>	
<p>e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.</p>	<p>Less Than Significant Impact</p>	<p>None</p>	<p>Less Than Significant Impact</p>
<p>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.</p>	<p>Significant Impact</p>	<p>MM BIO-1: The Property Owner/Developer shall mitigate for impacts to coastal sage scrub and coastal California gnatcatcher prior to the issuance of a grading permit through one or a combination of the following options, as elected by the Project Owner/Developer and approved by the USFWS and CDFW: (1) payment of the NCCP/HCP mitigation fee (only if allowed by the USFWS and CDFW because the Project is within an Existing Use area); (2) long-term preservation of existing coastal sage scrub habitat occupied by coastal California gnatcatchers at an on-site or off-site location; and/or (3) restoration of coastal sage scrub habitat at an on-site or off-site location. Coastal sage scrub shall be replaced at a minimum 1:1 ratio, or as otherwise determined by the USFWS and CDFW.</p> <p>Prior to the issuance of a grading permit, the Property Owner/Developer shall obtain a Biological Opinion from the USFWS describing the mitigation requirements. If the mitigation fee option is allowed, the Property Owner/Developer shall pay the mitigation fee (calculated based on the above-referenced ratio) to the NCCP Non-profit Corporation for the replacement of impacted coastal sage scrub resources prior to the issuance of a grading permit. If the preservation option is selected, a Long Term Protection and Management Plan (LTPMP) shall be prepared by a qualified Restoration Ecologist and shall be reviewed and approved by the USFWS and CDFW prior to the issuance of a grading permit. If the option of restoration of coastal sage scrub habitat is selected, a Habitat Mitigation and Monitoring Program (HMMP) shall be prepared by a qualified Restoration Ecologist and reviewed and approved by the USFWS and CDFW prior to the issuance of a grading permit. If either options #2 or #3 are selected, the Property Owner/Developer shall be responsible for implementing either the LTPMP and/or HMMP and ensuring that the mitigation program achieves the approved performance criteria. If either options #2 or #3 are selected, the Property Owner/Developer shall</p>	<p>Less Than Significant With Mitigation Incorporated</p>

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		<p>implement the LTPMP or HMMP per its specified requirements, materials, methods, and performance criteria.</p> <p>If option #3 is selected, the HMMP shall include the following items:</p> <ul style="list-style-type: none"> • Responsibilities and Qualifications. The responsibilities and qualifications of the Property Owner/Developer, ecological specialists, and restoration (landscape) contracting personnel who shall implement the plan shall be specified. At a minimum, the HMMP shall specify that the ecological specialists and contractors have performed successful installation and long-term monitoring and maintenance of Southern California native habitat mitigation/restoration programs. A successful program shall be defined as one that has been signed off on by the resource agencies. • Performance Criteria. Mitigation performance criteria to be specified in the HMMP shall conform to the resource agency permit conditions. The HMMP shall state that the use of the mitigation site(s) by special status wildlife species (e.g., coastal California gnatcatcher), though not a requirement for site success, would be regarded by the resource agencies as a significant factor in considering eligibility for program sign-off. • Site Selection. The mitigation site(s) shall be determined in coordination with the Property Owner/Developer and the resource agencies. To maximize the value of the habitat provided, the site(s) shall be contiguous to other permanently preserved parcels. The soils and other physical characteristics of the potential mitigation site(s) shall be analyzed to ensure that proper conditions exist for the establishment of coastal sage scrub habitat. • Seed Materials Procurement. At least one year prior to mitigation implementation, the Property Owner/Developer or its consultants/contractors shall initiate collection of the native seed materials specified in the HMMP. All seed mixes shall be of local origin (i.e., collected within 20 miles, and within the same watershed, as the selected restoration/enhancement site), to ensure genetic integrity. No seed materials of unknown or non-local geographic origin shall be used. Seed collection shall be prioritized per habitat area, in the following order: (a) Project impact areas (highest priority); (b) other on-site habitat areas; and (c) off-site habitat areas (lowest priority), assuming availability of seed species in multiple locations. • Wildlife Surveys and Protection. The HMMP shall specify any wildlife surveys (i.e., nesting bird surveys, focused/protocol surveys for special status species [e.g., coastal California gnatcatcher]) and biological monitoring that are required to avoid significant adverse impacts to wildlife species during the performance of mitigation site preparation, installation, or maintenance tasks. The HMMP shall also describe potential restrictions on these tasks due to special status wildlife conditions on the mitigation site(s) (e.g., suspension of these tasks during the nesting bird season). • Site Preparation and Plant Materials Installation. Mitigation site preparation shall include all of the following: (a) protection of existing native species and habitats (including compliance with applicable seasonal restrictions, if any); (b) installation of protective fencing and/or signage (as needed); (c) initial trash and weed removal (outside the nesting bird season) and methods; (d) soil treatments, as needed (i.e., imprinting, de-compacting); (e) installation of erosion-control measures (i.e., fully natural/bio-degradable [not “photo-degradable” plastic mesh] fiber roll); (f) application of salvaged native plant materials (i.e., coarse woody debris), as available and supervised by a biological monitor; (g) temporary irrigation installation; (h) a minimum one-year preliminary weed abatement program (prior to the installation of native plant and seed materials)—including specification of approved herbicides; (i) planting of container plant and cutting species; and (j) seed mix application. 	

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		<ul style="list-style-type: none"> • Schedule. An implementation schedule shall be developed that includes planting and seeding to occur in the fall and winter (i.e., between November 1 and January 31) and the frequency of long-term maintenance and monitoring activities (including the dates of annual quantitative surveys, as described below) for five years or until the mitigation program achieves the approved performance criteria and has been released from maintenance requirements by the resource agencies. • Maintenance Program. The Maintenance Program shall include (a) protection of existing native species and habitats (including compliance with applicable seasonal restrictions, if any); (b) maintenance of protective fencing and/or signage; (c) trash and weed removal—including specification of approved herbicides; (d) maintenance of erosion-control measures; (e) inspection/repairs of irrigation components; (f) replacement of dead container plant and cuttings (as needed); (g) application of remedial seed mixes (as needed); (h) herbivory control; and (i) removal of all non-vegetative materials (i.e., fencing, signage, irrigation components) upon Project completion. The mitigation site(s) shall be maintained for a period of five years to ensure successful coastal sage scrub habitat establishment within the restored/enhanced sites; however, the Property Owner/Developer may request to be released from maintenance requirements by the resource agencies prior to five years if the mitigation program has achieved all performance criteria. • Monitoring Program. The Monitoring Program shall include (a) qualitative monitoring (i.e., general habitat conditions, photo-documentation from established photo stations); (b) quantitative monitoring; (c) annual monitoring reports, which shall be submitted to the Property Owner/Developer and the resource agencies for five years following implementation of site preparation and plant materials installation activities; and (d) wildlife surveys and monitoring as described above. The annual monitoring reports shall include a detailed discussion of mitigation site performance (e.g., measured vegetation coverage and diversity) and compliance with required performance criteria, a discussion of wildlife species' use of the restored and/or enhanced habitat area(s), and a list of proposed remedial measures to address noncompliance (if any) with any performance criteria. The site(s) shall be monitored for five years following completion of site preparation and plant materials installation activities or until the Property Owner/Developer has been released from maintenance requirements by the resource agencies. • Long-term preservation. Long-term preservation of the mitigation site(s) shall be outlined in the HMMP to ensure that the mitigation site(s) are not impacted by future development. <p>The NCCP/HCP requires the following construction-related measures by implemented during construction:</p> <ul style="list-style-type: none"> • To the maximum extent practicable, no grading of coastal sage scrub habitat that is occupied by nesting gnatcatchers shall occur during the breeding season (i.e., February 15 through July 15). It is expressly understood that this provision and the remaining provisions of these "construction-related minimization measures," are subject to public health and safety considerations. These considerations include unexpected slope stabilization, erosion control measures, and emergency facility repairs. In the event of such public health and safety circumstances, the Property Owner/Developer shall provide USFWS/CDFW with the maximum practicable notice (or such notice as is specified in the NCCP/HCP) to allow for capture of gnatcatchers, cactus wrens, and any other coastal sage scrub Covered Species that are not otherwise flushed and shall carry out the following measures only to the extent as practicable in the context of the public health and safety considerations. • Prior to the commencement of grading operations or other activities involving significant soil disturbance, all areas of coastal sage scrub habitat to be avoided under the provisions of the NCCP/HCP, shall be identified with temporary fencing or other markers clearly visible to construction personnel. Additionally, prior to the commencement of grading operations or other activities involving disturbance of coastal sage scrub, a survey shall be conducted to locate 	

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		<p>gnatcatchers and cactus wrens within 100 feet of the outer extent of projected soil disturbance activities and the locations of any such species shall be clearly marked and identified on the construction/grading plans.</p> <ul style="list-style-type: none"> • A monitoring biologist, acceptable to USFWS/CDFW shall be onsite during any clearing of coastal sage scrub. The Property Owner/Developer shall advise USFWS/CDFW at least 7 calendar days prior to the clearing of any habitat occupied by Covered Species to allow USFWS/CDFW to work with the monitoring biologist in connection with bird flushing capture activities. The monitoring biologist shall flush Covered Species (avian or other mobile Covered Species) from occupied habitat areas immediately prior to brush-clearing and earth-moving activities. If birds cannot be flushed, they shall be captured in mist nets, if feasible, and relocated to areas of the site(s) to be protected or to the NCCP/HCP Reserve System. It shall be the responsibility of the monitoring biologist to assure that Covered Bird Species shall not be directly impacted by brush-clearing and earth-moving equipment in a manner that also allows for construction activities on a timely basis. • Following the completion of initial grading/earth movement activities, all areas of coastal sage scrub habitat to be avoided by construction equipment and personnel shall be marked with temporary fencing or other appropriate markers clearly visible to construction personnel. No construction access, parking, or storage of equipment shall be permitted within such marked areas. • In areas bordering the NCCP Reserve System containing significant coastal sage scrub identified in the NCCP/HCP for protection, vehicle transportation routes between cut-and-fill locations shall be restricted to a minimum number during construction consistent with Project construction requirements. Waste dirt or rubble shall not be deposited on adjacent coastal sage scrub identified in the NCCP/HCP for protection. Pre-construction meetings involving the monitoring biologist, construction supervisors, and equipment operators shall be conducted and documented to ensure maximum practicable adherence to these measures. • Coastal sage scrub identified in the NCCP/HCP for protection and located within the likely dust drift radius of construction areas shall be periodically sprayed with water to reduce accumulated dust on the leaves as recommended by the monitoring biologist. 	

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Section 4.4 - Cultural Resources			
<p>a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.</p>	<p>Significant Impact</p>	<p>MM CUL-1</p> <p>Prior to the issuance of the first grading permit for each Project phase (i.e., the multiple-family, commercial and single-family components, respectively), the Property Owner/Developer shall provide written evidence to the City that the Property Owner/Developer has retained a qualified archaeologist who meets the Secretary of the Interior’s Professional Qualification standards for archaeology to observe grading activities within previously undisturbed soils, and to evaluate any previously unknown archaeological resources (if any), as necessary, which are discovered during Project construction. The archaeologist shall be present at the pre-grade conference, shall establish procedures for archaeological resource surveillance within previously undisturbed soils, and shall establish, in cooperation with the Property Owner/Developer, procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the artifacts, as appropriate pursuant to applicable laws and regulations. If soils cannot be shown in geotechnical reports or by other means to have been previously disturbed, archaeological monitoring shall be conducted. If archaeological resources are inadvertently unearthed during excavation or other ground-disturbing activities, the contractor shall immediately cease all earth-disturbing activities within a 100-foot radius of the area of discovery and the archaeologist and City shall be notified immediately. If the City, in consultation with the archaeologist, determines the archaeological resources to be significant, then the qualified archaeologist shall make recommendations to the City on the feasible measures that shall be implemented to protect the discovered resource(s), including, but not limited to, exploration, excavation, and/or salvage in accordance with State CEQA Guidelines Section 15064.5. Any previously undiscovered resource(s) found during construction within the Project Site shall be recorded on appropriate California Department of Parks and Recreation (DPR) forms.</p> <p>If the relevant resource(s) (if any) are determined to be historical resources as defined under CEQA Guideline Section 15064.5 or a unique archaeological resource in Public Resources Code Section 21083.2, feasible mitigation measures and an archaeological treatment plan shall be developed by the qualified Archaeologist and recommended to the Property Owner/Developer and the City. Appropriate mitigation measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the find(s) as detailed in the archaeological treatment plan. After the find has been appropriately and feasibly avoided or mitigated, work in the area shall be permitted to resume.</p>	<p>Less Than Significant With Mitigation Incorporated</p>
<p>b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.</p>	<p>Significant Impact</p>	<p>MM CUL-1</p> <p>Prior to the issuance of the first grading permit for each Project phase (i.e., the multiple-family, commercial and single-family components, respectively), the Property Owner/Developer shall provide written evidence to the City that the Property Owner/Developer has retained a qualified archaeologist who meets the Secretary of the Interior’s Professional Qualification standards for archaeology to observe grading activities within previously undisturbed soils, and to evaluate any previously unknown archaeological resources (if any), as necessary, which are discovered during Project construction. The archaeologist shall be present at the pre-grade conference, shall establish procedures for archaeological resource surveillance within previously undisturbed soils, and shall establish, in cooperation with the Property Owner/Developer, procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the artifacts, as appropriate pursuant to applicable laws and regulations. If soils cannot be shown in geotechnical reports or by other means to have been previously disturbed, archaeological monitoring shall be conducted. If archaeological resources are inadvertently unearthed during excavation or other ground-disturbing activities, the contractor shall immediately cease all earth-disturbing activities within a 100-foot radius of the area of discovery and the archaeologist and City shall be notified immediately. If the City, in consultation with the archaeologist, determines the archaeological resources to be significant, then the qualified archaeologist shall make recommendations to the City on the feasible measures that shall be implemented to protect the discovered resource(s), including, but not limited to, exploration, excavation, and/or salvage in accordance with State CEQA Guidelines Section 15064.5. Any previously undiscovered</p>	<p>Less Than Significant With Mitigation Incorporated</p>

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Threshold of Significance	Impact Before Significance	Mitigation Measures	Level of Significance After Mitigation
		<p>resource(s) found during construction within the Project Site shall be recorded on appropriate California Department of Parks and Recreation (DPR) forms.</p> <p>If the relevant resource(s) (if any) are determined to be historical resources as defined under CEQA Guideline Section 15064.5 or a unique archaeological resource in Public Resources Code Section 21083.2, feasible mitigation measures and an archaeological treatment plan shall be developed by the qualified Archaeologist and recommended to the Property Owner/Developer and the City. Appropriate mitigation measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the find(s) as detailed in the archaeological treatment plan. After the find has been appropriately and feasibly avoided or mitigated, work in the area shall be permitted to resume.</p>	
<p>c) Disturb any human remains, including those interred outside of formal cemeteries.</p>	<p>Significant Impact</p>	<p>MM CUL-1 Prior to the issuance of the first grading permit for each Project phase (i.e., the multiple-family, commercial and single-family components, respectively), the Property Owner/Developer shall provide written evidence to the City that the Property Owner/Developer has retained a qualified archaeologist who meets the Secretary of the Interior’s Professional Qualification standards for archaeology to observe grading activities within previously undisturbed soils, and to evaluate any previously unknown archaeological resources (if any), as necessary, which are discovered during Project construction. The archaeologist shall be present at the pre-grade conference, shall establish procedures for archaeological resource surveillance within previously undisturbed soils, and shall establish, in cooperation with the Property Owner/Developer, procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the artifacts, as appropriate pursuant to applicable laws and regulations. If soils cannot be shown in geotechnical reports or by other means to have been previously disturbed, archaeological monitoring shall be conducted. If archaeological resources are inadvertently unearthed during excavation or other ground-disturbing activities, the contractor shall immediately cease all earth-disturbing activities within a 100-foot radius of the area of discovery and the archaeologist and City shall be notified immediately. If the City, in consultation with the archaeologist, determines the archaeological resources to be significant, then the qualified archaeologist shall make recommendations to the City on the feasible measures that shall be implemented to protect the discovered resource(s), including, but not limited to, exploration, excavation, and/or salvage in accordance with State CEQA Guidelines Section 15064.5. Any previously undiscovered resource(s) found during construction within the Project Site shall be recorded on appropriate California Department of Parks and Recreation (DPR) forms.</p> <p>If the relevant resource(s) (if any) are determined to be historical resources as defined under CEQA Guideline Section 15064.5 or a unique archaeological resource in Public Resources Code Section 21083.2, feasible mitigation measures and an archaeological treatment plan shall be developed by the qualified Archaeologist and recommended to the Property Owner/Developer and the City. Appropriate mitigation measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the find(s) as detailed in the archaeological treatment plan. After the find has been appropriately and feasibly avoided or mitigated, work in the area shall be permitted to resume.</p> <p>MM CUL-2 If any human remains are accidentally found or recognized during ground-disturbing activities, then the following steps shall be taken:</p> <ol style="list-style-type: none"> 1. No further excavation or disturbance of the area where the remains were found or any nearby area that is reasonably suspected to overlie adjacent remains shall occur, in accordance with Section 7050.5 of the California Health and Safety Code, until the County Coroner is notified of the discovery, which shall happen immediately and the following steps are taken. If the Coroner determines that the remains are or believed to be Native American, s/he shall notify the NAHC in West Sacramento within 24 hours of the discovery. In accordance with Section 5097.98 of the California Public Resources Code, the NAHC shall identify and must immediately notify those persons it believes to be the most likely descended (MLD) from the deceased Native American. The 	<p>Less Than Significant With Mitigation Incorporated</p>

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		<p>MLD may make recommendations to the landowner or the person responsible for the excavation work within 48 hours of being notified by the NAHC, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resource Code Section 5097.98; OR,</p> <p>2. Where the following conditions occur, the landowner or his or her authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity either in accordance with the recommendations of the MLD or on the Project Site in a location not subject to further subsurface disturbance:</p> <ul style="list-style-type: none"> • The NAHC is unable to identify an MLD or the MLD failed to make a recommendation within 48 hours after being notified by the commission. • The MLD identified fails to make a recommendation. • The landowner or his or her authorized representative rejects the recommendation of the MLD, and mediation by the NAHC fails to provide measures acceptable to the landowner. 	
Section 4.5 - Energy			
<p>a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.</p>	<p>Significant Impact</p>	<p>MM GHG-1: New residential and commercial uses shall be all-electric (i.e., natural gas usage shall be prohibited) except as otherwise provided for in this MM GHG-1. Natural gas usage and the extension of existing natural gas infrastructure shall be permitted for the multiple-family residential building: (A) for all fire elements located (1) at the front entrance, (2) on the rooftop deck, (3) in all common areas, and (B) for each individual residential unit stove (but not for ovens or heating/cooling systems within each unit). Prior to the issuance of the building permit for vertical construction of the subject Project component (i.e., multiple-family residential, commercial, or single-family residential), the Property Owner/Developer shall submit a utility plan to the City showing compliance with this MM GHG-1.</p> <p>MM GHG-2: The Property Owner/Developer use diligent and good faith efforts to install and maintain solar power generation in the Project Site to generate at least 15% of the Project's electrical demand on-site. Solar panels may be installed on rooftops, above the surface parking lot for the commercial buildings, behind (south of) the commercial buildings, and/or elsewhere in the Project Site to satisfy this MM GHG-2. The locations of on-site power generation shall be subject to review and approval by the City Planning Department to confirm compatibility with the scenic corridor overlay requirements. Solar panels shall not be visible from Santa Ana Canyon Road. Prior to issuance of the building permit for vertical construction of the subject Project component (i.e., multiple-family residential, commercial, or single-family residential), the Property Owner/Developer shall submit a memorandum and plan to the City Planning Department for review and approval reasonably documenting (a) compliance with this MM GHG-2 with respect to the subject Project component and (b) demonstrating that the proposed solar panels would not result in a substantial source of glare for neighboring properties and for local roadways. By February 1 of each year, the Property Owner/Developer shall submit a memorandum to the City Planning Department describing the prior year's electrical usage and on-site power generation. If the 15% on-site power generation was not achieved in the prior year, the memorandum shall contain feasible measures that the Property Owner/Developer shall implement to reduce electrical usage and/or to increase on-site renewable energy generation to achieve this target.</p> <p>MM GHG-3: The Property Owner/Developer shall enter into a Power Purchasing Agreement with Anaheim Public Utilities for the purchase of at least 60% "green power" for the Project's electricity demand that cannot be produced on-site, if available. The Property Owner/Developer shall submit documentation of green power</p>	<p>Less Than Significant With Mitigation Incorporated</p>

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Threshold of Significance	Impact Before Significance	Mitigation Measures	Level of Significance After Mitigation
		purchases for the prior year, or documentation that it is not available, to the City Planning Department each February 1. This information shall be included in the memorandum that is required by MM GHG-2 .	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	Less Than Significant Impact	None	Less Than Significant Impact
Section 4.6 - Geology and Soils			
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: <ul style="list-style-type: none"> 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. 	Less Than Significant Impact	None	Less Than Significant Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: <ul style="list-style-type: none"> ii. Strong seismic ground shaking 	Less Than Significant Impact	None	Less Than Significant Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: <ul style="list-style-type: none"> iii. Seismic-related ground failure, including liquefaction 	Less Than Significant Impact	None	Less Than Significant Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: <ul style="list-style-type: none"> iv. Landslides 	Less Than Significant Impact	None	Less Than Significant Impact
(b) Result in substantial soil erosion or the loss of topsoil.	Less Than Significant Impact	None	Less Than Significant Impact
(c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.	Less Than Significant Impact	None	Less Than Significant Impact
(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.	Significant Impact	MM GEO-1 During fine grading activities and prior to building construction for each building, advanced expansive soils testing shall be conducted by an approved geotechnical consultant to confirm that any proposed fill placed within the new building areas consists of very low expansion potential (EI<50). The geotechnical consultant shall provide recommendations related to the expansion potential of the soils that are evaluated to the Property Owner/Developer, which shall be incorporated into the Project's final design to the satisfaction of the City's Public Works Department.	Less Than Significant With Mitigation Incorporated
(e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste disposal systems where sewers are not available for the disposal of waste water.	No Impact	None	No Impact
(f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	Significant Impact	MM GEO-2 In the event that paleontological resources are inadvertently unearthed during excavation activities, the contractor shall temporarily halt or delay all earth-disturbing activities within a 25-foot radius of the area of discovery until the discovery is examined by a qualified Paleontologist in accordance with Society of	Less Than Significant With Mitigation Incorporated

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		<p>Vertebrate Paleontology standards, and the contractor shall contact the City's Planning and Building Department immediately. In connection with each specific individual development proposal, the relevant Applicant shall include a standard inadvertent discovery clause in every Project-related construction contract to inform contractors of this requirement. The Property Owner/Developer shall retain a qualified professional paleontologist to evaluate the significance of the find, and in consultation with the City's Planning and Building Department, determine an appropriate course of action to feasibly mitigate impacts to same. If the paleontological resources are found to be significant, the paleontologist, in consultation with the City's Planning and Building Department, shall determine appropriate and feasible actions for avoidance, exploration, salvage, and/or curation that is consistent with the standards prescribed by the Society of Vertebrate Paleontology in the guideline document Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (2010). Any recovered fossil should be deposited in an appropriate repository, such as the University of California Museum of Paleontology (UCMP), where it will be properly curated and made accessible for future studies. After the recommended measures have been implemented, work within the 25-foot vicinity of the find shall be permitted to resume and no further mitigation for said find shall be necessary.</p>	
Section 4.7 – Greenhouse Gas Emissions			
<p>a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.</p>	<p>Significant Impact</p>	<p>MM GHG-1: New residential and commercial uses shall be all-electric (i.e., natural gas usage shall be prohibited) except as otherwise provided for in this MM GHG-1. Natural gas usage and the extension of existing natural gas infrastructure shall be permitted for the multiple-family residential building: (A) for all fire elements located (1) at the front entrance, (2) on the rooftop deck, (3) in all common areas, and (B) for each individual residential unit stove (but not for ovens or heating/cooling systems within each unit). Prior to the issuance of the building permit for vertical construction of the subject Project component (i.e., multiple-family residential, commercial, or single-family residential), the Property Owner/Developer shall submit a utility plan to the City showing compliance with this MM GHG-1.</p> <p>MM GHG-2: The Property Owner/Developer use diligent and good faith efforts to install and maintain solar power generation in the Project Site to generate at least 15% of the Project's electrical demand on-site. Solar panels may be installed on rooftops, above the surface parking lot for the commercial buildings, behind (south of) the commercial buildings, and/or elsewhere in the Project Site to satisfy this MM GHG-2. The locations of on-site power generation shall be subject to review and approval by the City Planning Department to confirm compatibility with the scenic corridor overlay requirements. Solar panels shall not be visible from Santa Ana Canyon Road. Prior to issuance of the building permit for vertical construction of the subject Project component (i.e., multiple-family residential, commercial, or single-family residential), the Property Owner/Developer shall submit a memorandum and plan to the City Planning Department for review and approval reasonably documenting (a) compliance with this MM GHG-2 with respect to the subject Project component and (b) demonstrating that the proposed solar panels would not result in a substantial source of glare for neighboring properties and for local roadways. By February 1 of each year, the Property Owner/Developer shall submit a memorandum to the City Planning Department describing the prior year's electrical usage and on-site power generation. If the 15% on-site power generation was not achieved in the prior year, the memorandum shall contain measures that the Property Owner/Developer shall implement to reduce electrical usage and/or to increase on-site renewable energy generation to achieve this target.</p> <p>MM GHG-3: The Property Owner/Developer shall enter into a Power Purchasing Agreement with Anaheim Public Utilities for the purchase of at least 60% "green power" for the Project's electricity demand that cannot be produced on-site, if available. The Property Owner/Developer shall submit documentation of green power purchases for the prior year, or documentation that it is not available, to the City Planning Department each February 1. This information shall be included in the memorandum that is required by MM GHG-2.</p>	<p>Significant and Unavoidable</p>

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Threshold of Significance	Impact Before Significance	Mitigation Measures	Level of Significance After Mitigation
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	Less Than Significant Impact	None	Less Than Significant Impact
Section 4.8 – Hazards and Hazardous Materials			
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	Significant Impact	<p>MM HAZ-1 The Property Owner/Developer shall include appropriate contractual provisions in the agreement with the Project Contractor that obligates the Contractor adhere to the following requirements. First, the Contractor shall transport materials deemed as hazardous in compliance with the applicable requirements of Title 22, Division 4.5 of the California Code of Regulations, the U.S. Department of Transportation regulations in the Code of Federal Regulations (specifically, Title 49, Hazardous Materials Transportation Act and Title 40, Part 263, Subtitle C of Resource Conservation and Recovery Act), California Department of Transportation (Caltrans) standards, and Occupational Safety and Health Administration (OSHA) standards. To ensure implementation of these requirements, the Contractor shall complete the required tracking and reporting in accordance with applicable provisions of the EPA’s Hazardous Waste Manifest System requirements. In addition, the Contractor shall ensure that City is copied on all reporting to regulatory agencies throughout the construction process. Prior to issuance of an occupancy permit, the Contractor shall submit to the City a log of all reporting to regulatory agencies for review to document compliance with the foregoing requirements.</p>	Less Than Significant With Mitigation Incorporated
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.	Significant Impact	<p>MM HAZ-1 The Property Owner/Developer shall include appropriate contractual provisions in the agreement with the Project Contractor that obligates the Contractor adhere to the following requirements. First, the Contractor shall transport materials deemed as hazardous in compliance with the applicable requirements of Title 22, Division 4.5 of the California Code of Regulations, the U.S. Department of Transportation regulations in the Code of Federal Regulations (specifically, Title 49, Hazardous Materials Transportation Act and Title 40, Part 263, Subtitle C of Resource Conservation and Recovery Act), California Department of Transportation (Caltrans) standards, and Occupational Safety and Health Administration (OSHA) standards. To ensure implementation of these requirements, the Contractor shall complete the required tracking and reporting in accordance with applicable provisions of the EPA’s Hazardous Waste Manifest System requirements. In addition, the Contractor shall ensure that City is copied on all reporting to regulatory agencies throughout the construction process. Prior to issuance of an occupancy permit, the Contractor shall submit to the City a log of all reporting to regulatory agencies for review to document compliance with the foregoing requirements.</p> <p>MM HAZ-2 Prior to issuance of the Project’s first grading permit, the Property Owner/Developer shall properly remove and dispose of the abandoned light-duty pickup truck located on the Project Site’s east-central portion pursuant to applicable laws and regulations. If during truck removal, fuel or other hazardous materials are released or if odors or soil discoloration are observed on the ground, the Property Owner/Developer shall hire a specialized environmental professional to assess, address the extent of any subsurface contamination, and identify appropriate remediation pursuant to applicable laws and regulations, for which the Property Owner/Developer shall implement. After completion of the activities set forth in this MM HAZ-2, a memorandum shall be submitted to the City documenting the completion of MM HAZ-2.</p> <p>MM HAZ-3 Prior to issuance of the Project’s first grading permit, the Property Owner/Developer shall submit reasonable documentation to the City that additional soil sampling has been conducted for arsenic in the northern portion of the Project Site where past agricultural uses occurred, the purpose of which is to confirm the levels of any residual arsenic. Based on the results of this additional soil sampling, the Property Owner/Developer shall develop and submit a soil management plan based on the results to specify the proper handling and transport procedures (if any) for the impacted soils within the Project Site to minimize potential exposure in accordance with applicable State and Federal laws and regulations. The soil management plan shall be provided to the relevant governing regulatory agency (e.g., DTSC, County, etc.) (or the City, if no other governing regulatory agency) for review pursuant to applicable laws and regulations,</p>	Less Than Significant With Mitigation Incorporated

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		which shall be approved prior to the issuance of the applicable grading permit. The approved soil management plan shall be implemented by the Contractor during construction.	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	Significant Impact	MM HAZ-1 The Property Owner/Developer shall include appropriate contractual provisions in the agreement with the Project Contractor that obligates the Contractor adhere to the following requirements. First, the Contractor shall transport materials deemed as hazardous in compliance with the applicable requirements of Title 22, Division 4.5 of the California Code of Regulations, the U.S. Department of Transportation regulations in the Code of Federal Regulations (specifically, Title 49, Hazardous Materials Transportation Act and Title 40, Part 263, Subtitle C of Resource Conservation and Recovery Act), California Department of Transportation (Caltrans) standards, and Occupational Safety and Health Administration (OSHA) standards. To ensure implementation of these requirements, the Contractor shall complete the required tracking and reporting in accordance with applicable provisions of the EPA's Hazardous Waste Manifest System requirements. In addition, the Contractor shall ensure that City is copied on all reporting to regulatory agencies throughout the construction process. Prior to issuance of an occupancy permit, the Contractor shall submit to the City a log of all reporting to regulatory agencies for review to document compliance with the foregoing requirements.	Less Than Significant With Mitigation Incorporated
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.	Less Than Significant Impact	None	Less Than Significant Impact
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area.	No Impact	None	No Impact
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	Significant Impact	MM HAZ-4 Prior to the issuance of each grading permit, a Construction Management Plan shall be prepared by the Property Owner/Developer for the review and approval of the City of Anaheim. The Construction Management Plan shall be prepared in accordance with the applicable requirements contained in the Manual on Uniform Traffic Control Devices (MUTCD). Construction activities shall comply with the approved Construction Management Plan to the reasonable satisfaction of the City of Anaheim. The Property Owner/Developer shall begin coordination with the City on the Construction Management Plan as soon as practicable during the final design process and in advance of construction so that effective measures can be developed to avoid, minimize, and mitigate, to the extent feasible, construction impacts to parking and circulation on-site and in the vicinity of the Project Site. At a minimum, the Construction Management Plan shall: <ul style="list-style-type: none"> • Describe the durations and locations of any temporary lane closures that are needed on Santa Ana Canyon Road. • Describe the traffic control measures that would be implemented for any temporary lane closures or other disruptions to traffic that would result from Project construction. • Identify the routes that construction vehicles shall utilize for the delivery of construction materials to access the Project Site and for egress from the Project Site. • Identify the location of parking and materials storage for construction workers during all phases of construction. Parking for construction workers shall be provided on-site or at additional off-site locations that are not on public streets. Also see MM BIO-13. 	Less Than Significant With Mitigation Incorporated

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		<ul style="list-style-type: none"> • Identify emergency access points and emergency access routes to allow for adequate emergency access to/within the Project Site and to parcels to the south of the Project Site throughout all Project construction phases. • Specify the hours during which transport activities can occur and methods to mitigate construction-related impacts to adjacent streets. • Requirements that the Contractor keep all haul routes reasonably clean and free of debris including but not limited to gravel and dirt as a result of its operations. The Contractor shall take reasonable and diligent steps to clean adjacent streets of any material which may have been spilled, tracked, or blown onto adjacent streets or areas. Also see MM BIO-10. • The Property Owner/Developer shall obtain a transportation permit pursuant to applicable laws and regulations for oversized loads which will list the applicable haul routes and haul hours. All hauling or transport of oversized loads shall occur between the hours of 8:30 AM and 3:30 PM only, Monday through Friday, unless approved otherwise by the City Engineer. No hauling or transport shall be allowed during nighttime hours, weekends or Federal holidays. • Include details on the reasonable maintenance of existing bicycle and pedestrian facilities and connectivity through the Project Site during construction to the reasonable satisfaction of the City Engineer. • Require that haul trucks entering or exiting public streets shall at all times yield to public traffic, pedestrians, bicyclists, and other users. • Provisions for the Contractor to repair existing pavement, streets, curbs, sidewalks, and/or gutters that may be damaged during Project construction. The repairs shall be completed in consultation with and to the reasonable satisfaction of the City Engineer. • Require that all construction-related parking and staging of vehicles shall be kept out of the adjacent public roads and shall occur either on-site or on designated off-site parcels that would not adversely affect access to or parking for nearby residences or businesses. <p>MM HAZ-5 Prior to issuance of a certificate of occupancy for the first multiple-family residential unit, the Property Owner/Developer shall fund and implement closed-circuit television (CCTV) cameras at Imperial Highway/Santa Ana Canyon Road, Anaheim Hills Road/Santa Ana Canyon Road, Fairmont Boulevard/Santa Ana Canyon Road, Deer Canyon Road/Santa Ana Canyon Road, Festival Drive/Santa Ana Canyon Road, and Weir Canyon Road/Santa Ana Canyon Road.</p> <p>MM HAZ-9: Prior to issuance of a certificate of occupancy, the Property Owner/Developer shall participate through the payment of a fair share contribution to Anaheim Fire and Rescue to support education and outreach including community exercises in support of "Know Your Way" evacuation planning and protocols.</p>	
<p>g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.</p>	<p>Significant Impact</p>	<p>MM HAZ-4 Prior to the issuance of each grading permit, a Construction Management Plan shall be prepared by the Property Owner/Developer for the review and approval of the City of Anaheim. The Construction Management Plan shall be prepared in accordance with the applicable requirements contained in the Manual on Uniform Traffic Control Devices (MUTCD). Construction activities shall comply with the approved Construction Management Plan to the reasonable satisfaction of the City of Anaheim. The Property Owner/Developer shall begin coordination with the City on the Construction Management Plan as soon as practicable during the final design process and in advance of construction so that effective measures can be developed to avoid, minimize, and mitigate, to the extent feasible, construction impacts to parking and circulation on-site and in the vicinity of the Project Site.</p>	<p>Less Than Significant With Mitigation Incorporated</p>

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SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Impact Before Significance	Mitigation Measures	Level of Significance After Mitigation
		<p align="center">At a minimum, the Construction Management Plan shall:</p> <ul style="list-style-type: none"> • Describe the durations and locations of any temporary lane closures that are needed on Santa Ana Canyon Road. • Describe the traffic control measures that would be implemented for any temporary lane closures or other disruptions to traffic that would result from Project construction. • Identify the routes that construction vehicles shall utilize for the delivery of construction materials to access the Project Site and for egress from the Project Site. • Identify the location of parking and materials storage for construction workers during all phases of construction. Parking for construction workers shall be provided on-site or at additional off-site locations that are not on public streets. Also see MM BIO-13. • Identify emergency access points and emergency access routes to allow for adequate emergency access to/within the Project Site and to parcels to the south of the Project Site throughout all Project construction phases. • Specify the hours during which transport activities can occur and methods to mitigate construction-related impacts to adjacent streets. • Requirements that the Contractor keep all haul routes reasonably clean and free of debris including but not limited to gravel and dirt as a result of its operations. The Contractor shall take reasonable and diligent steps to clean adjacent streets of any material which may have been spilled, tracked, or blown onto adjacent streets or areas. Also see MM BIO-10. • The Property Owner/Developer shall obtain a transportation permit pursuant to applicable laws and regulations for oversized loads which will list the applicable haul routes and haul hours. All hauling or transport of oversized loads shall occur between the hours of 8:30 AM and 3:30 PM only, Monday through Friday, unless approved otherwise by the City Engineer. No hauling or transport shall be allowed during nighttime hours, weekends or Federal holidays. • Include details on the reasonable maintenance of existing bicycle and pedestrian facilities and connectivity through the Project Site during construction to the reasonable satisfaction of the City Engineer. • Require that haul trucks entering or exiting public streets shall at all times yield to public traffic, pedestrians, bicyclists, and other users. • Provisions for the Contractor to repair existing pavement, streets, curbs, sidewalks, and/or gutters that may be damaged during Project construction. The repairs shall be completed in consultation with and to the reasonable satisfaction of the City Engineer. • Require that all construction-related parking and staging of vehicles shall be kept out of the adjacent public roads and shall occur either on-site or on designated off-site parcels that would not adversely affect access to or parking for nearby residences or businesses. <p>MM HAZ-5 Prior to issuance of a certificate of occupancy for the first multiple-family residential unit, the Property Owner/Developer shall fund and implement closed-circuit television (CCTV) cameras at Imperial Highway/Santa Ana Canyon Road, Anaheim Hills Road/Santa Ana Canyon Road, Fairmont Boulevard/Santa Ana Canyon Road, Deer Canyon Road/Santa Ana Canyon Road, Festival Drive/Santa Ana Canyon Road, and Weir Canyon Road/Santa Ana Canyon Road.</p> <p>MM HAZ-6 To minimize wildfire risks to the residents of the existing residences west of the Project Site as they wait to evacuate their neighborhood during a future evacuation event, the Property Owner/Developer shall maintain a fuel modification zone along the entire western boundary of the Project Site. As with other fuel</p>	

**TABLE 1-1
SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Impact Before Significance	Mitigation Measures	Level of Significance After Mitigation
		<p>modification zones, these additional fuel modification areas shall be maintained twice annually and in perpetuity by the Property Owner/Developer, with this requirement being implemented by the Property Owner/Developer or a Homeowner's Association pursuant to recorded Conditions, Covenants and Restrictions (CC&Rs). The additional areas that are added to the Project's fuel modification zones by this measure are depicted in Exhibits 4.8-1 and 4.8-2 of the Draft EIR, which shall be incorporated into this MM HAZ-6 by this reference.</p> <p>MM HAZ-7 Prior to issuance of a certificate of occupancy for the first multiple-family residential unit, the Property Owner/Developer shall develop and implement a project-specific wildfire evacuation and awareness plan. The plan shall be subject to review and approval by the City of Anaheim Planning Department, APD, and Anaheim Fire and Rescue staff. The plan shall include the following minimum requirements:</p> <ul style="list-style-type: none"> • The plan shall be provided to all tenants along with all lease agreements for tenants. • The plan shall include provisions and travel movements for evacuating the Project Site during a wildfire event that is located in the undeveloped areas immediately adjacent to the Project Site and for other events where the wildfire threat is further away. • The plan shall include the development and dissemination of wildfire evacuation outreach materials. These materials shall be provided to residents and employees within the Project Site annually. The outreach materials shall depict evacuation routes to use in case of a wildfire event and shall provide other practical wildfire preparedness information. • The plan shall include requirements for annual emergency evacuation drills for residents and employees in the Project Site. • The plan shall include the development, implementation, and ongoing maintenance of a method for the Property Owner/Developer to quickly and effectively communicate evacuation instructions to individuals at the Project Site, such as through the installation and maintenance of a wireless Public Address (PA) system and/or wireless texting services. • The plan shall include the provisions and ongoing maintenance of a camera. The camera would be oriented towards the southern edge of the Project Site with the primary purpose of providing additional information for emergency service providers to facilitate enhanced emergency response. The Property Owner/Developer shall provide a connection to the City's real-time crime center. <p>MM HAZ-8 Prior to issuance of a certificate of occupancy for the first multiple-family residential unit, the Property Owner/Developer shall fund and implement emergency vehicle preemption at traffic signals on Santa Ana Canyon Road from Weir Canyon Road to Imperial Highway.</p> <p>MM HAZ-9: Prior to issuance of a certificate of occupancy, the Property Owner/Developer shall participate through the payment of a fair share contribution to Anaheim Fire and Rescue to support education and outreach including community exercises in support of "Know Your Way" evacuation planning and protocols.</p> <p>MM HAZ-10 The Property Owner/Developer shall prepare and implement a construction fire prevention plan that shall designate fire safety measures that shall be implemented by the Project's contractor to reduce the possibility of fires during all construction phases of the Project. The plan shall include requirements for adequate fuel breaks between areas with flammable vegetation and all grading, site work, and other construction activities in accordance with applicable requirements and standards. The plan shall also include the following measures: fire watch/ fire guards during hot work and during use of heavy machinery; hose lines attached to hydrants or a water tender at multiple accessible locations throughout the construction site; Red Flag</p>	

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Threshold of Significance	Impact Before Significance	Mitigation Measures	Level of Significance After Mitigation
		warning weather period work restrictions; required on-site fire resources; and other measures as determined to be necessary.	
Section 4.9 – Hydrology and Water Quality			
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.	Less Than Significant Impact	None	Less Than Significant Impact
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.	Less Than Significant Impact	None	Less Than Significant Impact
c) Substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: i. result in substantial erosion or siltation on- or off-site;	Less Than Significant Impact	None	Less Than Significant Impact
c) Substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	Less Than Significant Impact	None	Less Than Significant Impact
c) Substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;	Less Than Significant Impact	None	Less Than Significant Impact
c) Substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: iv. impede or redirect flood flows.	Less Than Significant Impact	None	Less Than Significant Impact
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.	No Impact	None	No Impact
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	Less Than Significant Impact	None	Less Than Significant Impact
Section 4.10 – Land Use and Planning			
a) Physically divide an established community.	Less Than Significant Impact	None	Less Than Significant Impact
a) 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.	Significant Impact	MM BIO-10: To avoid and minimize the introduction and spread of invasive exotic plant species, the following measures shall be implemented.	Less Than Significant Impact

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Threshold of Significance	Impact Before Significance	Mitigation Measures	Level of Significance After Mitigation
		<ul style="list-style-type: none"> • Minimize Introduction of Weed Seeds: Prior to issuance of a grading permit, the Property Owner/Develop shall demonstrate that Construction Plans include the following notes related to the introduction of weed seeds: (1) Construction vehicles (e.g., excavators, backhoes, dump trucks) shall be washed prior to delivery to the construction site to prevent weed seeds from entering the construction area in mud on the tires or undercarriage. (2) Track-clean or other methods of vehicle cleaning shall be used by the construction contractor to prevent weed seeds from entering/exiting the construction site on vehicles. (3) Wattles used for erosion control shall be biodegradable and certified as weed-free. These procedures shall be implemented throughout construction. • Minimize Introduction of Invasives in Landscaping: Prior to issuance of a building permit, the Property Owner/Developer shall submit the Landscaping Plans to the City of Anaheim for review and approval prior to issuance of a building permit. The City of Anaheim will review the landscaping plans along with a qualified Biologist under contract to the City. The City’s Biologist shall make suggestions for suitable substitutes if needed. <ul style="list-style-type: none"> ○ The review shall ensure that no invasive, exotic plant species are used in proposed landscaping and that suitable substitutes are proposed (i.e., those listed on the California Invasive Plant Council’s Invasive Plant Inventory with a Risk Rating of “High” [Cal-IPC 2023]). ○ To the extent practicable, the Project’s Landscaping Plans shall include transition zones in areas of the development that are adjacent to undeveloped areas (see Exhibit 4.3-7). The landscaping within these transition zone shall be designed to buffer adjacent natural habitats from human activity using native plantings (e.g., lemonade berry, western sycamore, coast live oak, etc.). Landscaping shall use plants native to the area from the Recommended Acceptable Fire Resistive Plant Species (Anaheim Fire & Rescue 2018). • C. Ongoing Compliance With Landscaping: Prior to final building and zoning inspections, the Project Owner/Developer shall provide CC&Rs, reciprocal easements, or a similar document recorded on the property to the City for approval. To ensure ongoing compliance, the CC&Rs, reciprocal easements, or a similar document recorded on the property for commercial, multiple-family, and residential lots shall prohibit the use of highly invasive species (i.e., those listed on the California Invasive Plant Council’s Invasive Plant Inventory with a Risk Rating of “High” [Cal-IPC 2023]). Modifications to the CC&Rs shall also require City approval. <p>MM AES-3 To partially screen views of retaining walls, all retaining walls in the Project Site that are visible from Santa Ana Canyon Road shall be landscaped (as defined below) and/or they shall have an aesthetic treatment such as a rock façade treatment. If landscaping is used as the screening method, at a minimum the retaining wall landscaping shall include trees and/or shrubs that are planted at the base of the retaining wall that mature to at least ¾ of the average height of the wall. Alternatively, or in addition, landscaping of retaining walls can consist of the use of climbing vines and/or by using plantable walls. In areas that landscaping is used as a screen, plant materials shall screen at least 50% of each wall when viewed from Santa Ana Canyon Road. Prior to the issuance of a permit for the construction of retaining walls, the Property Owner/Developer shall depict retaining wall aesthetic treatments consistent with the Specific Plan Design Standards, and landscaping on plans and shall submit the plans to the City for review and approval, and shall thereafter adhere to same.</p>	

**TABLE 1-1
SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Impact Before Significance	Mitigation Measures	Level of Significance After Mitigation
Section 4.11 – Noise			
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.	Significant Impact	MM NOI-1: The Property Owner/Developer provide a form lease provision to the City for review and approval. The lease provision shall be included in all of the leases for the multiple-family residential units. The lease provision shall include the following minimum requirements for every tenant: (1) adherence to all applicable noise standards in the City’s Municipal Code (including those relating to amplified sound in Section 6.72); and (2) adherence to applicable provisions of the Hills Preserve Skydeck (Roof Deck) Operations Memorandum (as it may be amended from time to time by Property Owner/Developer).	Less Than Significant Impact
b) Generation of excessive groundborne vibration or groundborne noise levels.	Less Than Significant Impact	None	Less Than Significant Impact
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.	No Impact	None	No Impact
Section 4.12 – Population and Housing			
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).	Less Than Significant Impact	None	Less Than Significant Impact
a) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.	No Impact	None	No Impact
Section 4.13 – Public Services			
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: (i) Fire protection.	Potentially Significant Impact	MM HAZ-5 Prior to issuance of a certificate of occupancy for the first multiple-family residential unit, the Property Owner/Developer shall fund and implement closed-circuit television (CCTV) cameras at Imperial Highway/Santa Ana Canyon Road, Anaheim Hills Road/Santa Ana Canyon Road, Fairmont Boulevard/Santa Ana Canyon Road, Deer Canyon Road/Santa Ana Canyon Road, Festival Drive/Santa Ana Canyon Road, and Weir Canyon Road/Santa Ana Canyon Road. MM HAZ-8 Prior to issuance of a certificate of occupancy for the first multiple-family residential unit, the Property Owner/Developer shall fund and implement emergency vehicle preemption at traffic signals on Santa Ana Canyon Road from Weir Canyon Road to Imperial Highway. MM HAZ-9: Prior to issuance of a certificate of occupancy, the Property Owner/Developer shall participate through the payment of a fair share contribution to Anaheim Fire and Rescue to support education and outreach including community exercises in support of “Know Your Way” evacuation planning and protocols.	Less Than Significant With Mitigation Incorporated

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Threshold of Significance	Impact Before Significance	Mitigation Measures	Level of Significance After Mitigation
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: (ii) Police protection.	Potentially Significant Impact	MM HAZ-5 Prior to issuance of a certificate of occupancy for the first multiple-family residential unit, the Property Owner/Developer shall fund and implement closed-circuit television (CCTV) cameras at Imperial Highway/Santa Ana Canyon Road, Anaheim Hills Road/Santa Ana Canyon Road, Fairmont Boulevard/Santa Ana Canyon Road, Deer Canyon Road/Santa Ana Canyon Road, Festival Drive/Santa Ana Canyon Road, and Weir Canyon Road/Santa Ana Canyon Road. MM HAZ-8 Prior to issuance of a certificate of occupancy for the first multiple-family residential unit, the Property Owner/Developer shall fund and implement emergency vehicle preemption at traffic signals on Santa Ana Canyon Road from Weir Canyon Road to Imperial Highway.	Less Than Significant With Mitigation Incorporated
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: (iii) School.	Less Than Significant Impact	None	Less Than Significant Impact
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: (iv) Parks.	Less Than Significant Impact	None	Less Than Significant Impact
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: (v) Other public facilities.	Less Than Significant Impact	None	Less Than Significant Impact
Section 4.14 - Recreation			
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.	Less Than Significant Impact	None	Less Than Significant Impact
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.	Less Than Significant Impact	None	Less Than Significant Impact
Section 4.15 - Transportation			
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.	Less Than Significant Impact	None	Less Than Significant Impact

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<p>b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).</p>	<p>Significant Impact</p>	<p>MM TRANS-1 Implement Commute Trip Reduction Marketing. This measure consists of the implementation of a marketing strategy to promote the Project’s Commute Trip Reduction (CTR) program that would be available to all employees within the commercial component (through provision of same to the relevant tenants) and multiple-family residential component of the Project. This measure is not applicable to contractors. The intention of this measure is that additional information sharing and marketing as required by this measure shall promote and educate employees about their travel choices to the employment location beyond driving, such as carpooling, taking transit, walking, and biking, thereby reducing VMT and GHG emissions. 100% of employees (i.e., employees who are employed by tenants housed in the commercial component as well as those who are employed by the Property Owner/Developer to serve the multiple-family component) shall be eligible to participate in the CTR program. Prior to issuance of a certificate of occupancy for the multi-family component or the commercial component of the Project, as applicable, the Property Owner/Developer shall document the provision of designated priority parking to the employees of the commercial or multi-family component, as applicable, in the amount required pursuant to applicable requirements for those employees who carpool and also for those that travel to work using electric vehicles and/or zero emission vehicles. As part of the CTR program, the Property Owner/Developer shall provide a minimum \$50 monthly stipend to each participating employee that bicycles or walks to work an average of three or more days per week each month. By February 1 of each year, the Property Owner/Developer shall submit a memorandum to the City describing the marketing measures that had been implemented in the prior year.</p> <p>MM TRANS-2 Provide Information Regarding Ridesharing Opportunities. Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips, VMT and GHG emissions. Prior to issuance of an occupancy permit for the commercial component or the multiple-family residential component in the Project, the Property Owner/Developer shall develop and implement a ridesharing information program for participating employees within the Project Site as part of the CTR program discussed above in MM TRANS-1. As part of this measure and implementation of the CTR Program, the Property Owner/Developer shall establish, support, maintain, and fund a transportation demand management (TDM) coordinator, whose role would be to provide information regarding ridesharing opportunities to all employees in the Project Site. The CTR program shall provide information regarding ride-matching opportunities to facilitate committed vanpool groups for employees traveling similar routes at similar times. The CTR program shall also include a minimum \$100 monthly stipend per person to each participating employee that carpools to work at least three days per week per month. By February 1 of each year, the Property Owner/Developer shall submit a memorandum to the City describing the measures taken pursuant to this measure to promote ridesharing that had been implemented in the prior year.</p> <p>MM TRANS-3 Provide End-of-Trip Bicycle Facilities. This measure includes the installation and maintenance of end-of-trip facilities for employees of the multiple-family residential and commercial buildings in the Project Site. End-of-trip facilities shall include bike parking, bike lockers, showers, and personal lockers, which will be provided by the Property Owner/Developer. In addition to the provision of showers and/or personal lockers that may be required to be incorporated into the Project pursuant to applicable laws and regulations, the Property Owner/Developer shall provide a total of: (a) 52 long-term bicycle parking spaces via secure bike lockers and/or storage rooms and two short-term bike stalls for the multiple-family component, and (b) 20 long-term bicycle parking spaces via secure bike lockers and/or storage rooms and two short-term bicycle parking stalls for the commercial component. The facilities discussed in this measure shall be depicted on the relevant Project plans to be reviewed and approved by the City, and the facilities shall be installed prior to issuance of the relevant occupancy permit.</p> <p>MM TRANS-4 Provide Pedestrian Network Improvements. As part of this measure and to ensure implementation of the relevant design features, prior to issuance of a certificate of occupancy for</p>	<p>Significant and Unavoidable</p>

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		<p>the commercial and/or multiple-family residential components (whichever comes first), the Property Owner/Developer shall construct approximately 2,850 linear feet of a multi-use (pedestrian, bicycle and equestrian) trail along the south side of Santa Ana Canyon Road that would extend from the northwestern limits of the Project Site (approximately 385 feet east of Eucalyptus Avenue) to an existing sidewalk that ends approximately 385 feet west of Festival Drive. Also, prior to issuance of a certificate of occupancy for the commercial and/or multiple-family residential components (whichever comes first), the Property Owner/Developer shall construct approximately 2,950 linear feet of new sidewalk along the north side of Santa Ana Canyon Road from Eucalyptus Avenue to approximately 760 feet west of Festival Drive, if feasible. The Property Owner/Developer shall include a pedestrian crossing at the intersection of Deer Canyon Road and Santa Ana Canyon Road. During final design and prior to issuance of a grading permit as part of the City's Right-of-Way Construction Application Permit, the Property Owner/Developer shall provide the City with updated roadway improvement plans for review and approval that depict the sidewalk improvements described in this measure.</p> <p>MM TRANS-5 Provide Information Regarding Telecommute and/or Alternative Work Schedule Opportunities; Support Telecommuting for Project Residents. Prior to issuance of an occupancy permit for the commercial components in the Project, the TDM coordinator shall provide, as part of the Project's CTR program discussed above under MM TRANS-1, to all tenants of the commercial component available information regarding ways in which employers may consider telecommuting and alternative work schedule opportunities. In addition, the Property Owner/Developer shall provide all Project residents of the multiple-family residential component access to on-site "work-from-home" communal spaces, and shall also consider reasonable opportunities for employees of the multiple-family residential component, taking into due account job responsibilities, to telecommute to work at least one day per work week, and/or to have an alternative work schedule such as a 9/80 or 10/40 schedule to allow for fewer overall trips to the office.</p>	
<p>c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).</p>	<p>Less Than Significant Impact</p>	<p>None</p>	<p>Less Than Significant Impact</p>
<p>d) Result in inadequate emergency access.</p>	<p>Significant Impact</p>	<p>MM HAZ-4 Prior to the issuance of each grading permit, a Construction Management Plan shall be prepared by the Property Owner/Developer for the review and approval of the City of Anaheim. The Construction Management Plan shall be prepared in accordance with the applicable requirements contained in the Manual on Uniform Traffic Control Devices (MUTCD). Construction activities shall comply with the approved Construction Management Plan to the reasonable satisfaction of the City of Anaheim. The Property Owner/Developer shall begin coordination with the City on the Construction Management Plan as soon as practicable during the final design process and in advance of construction so that effective measures can be developed to avoid, minimize, and mitigate, to the extent feasible, construction impacts to parking and circulation on-site and in the vicinity of the Project Site.</p> <p>At a minimum, the Construction Management Plan shall:</p> <ul style="list-style-type: none"> • Describe the durations and locations of any temporary lane closures that are needed on Santa Ana Canyon Road. • Describe the traffic control measures that would be implemented for any temporary lane closures or other disruptions to traffic that would result from Project construction. 	<p>Less Than Significant With Mitigation Incorporated</p>

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		<ul style="list-style-type: none"> • Identify the routes that construction vehicles shall utilize for the delivery of construction materials to access the Project Site and for egress from the Project Site. • Identify the location of parking and materials storage for construction workers during all phases of construction. Parking for construction workers shall be provided on-site or at additional off-site locations that are not on public streets. Also see MM BIO-13. • Identify emergency access points and emergency access routes to allow for adequate emergency access to/within the Project Site and to parcels to the south of the Project Site throughout all Project construction phases. • Specify the hours during which transport activities can occur and methods to mitigate construction-related impacts to adjacent streets. • Requirements that the Contractor keep all haul routes reasonably clean and free of debris including but not limited to gravel and dirt as a result of its operations. The Contractor shall take reasonable and diligent steps to clean adjacent streets of any material which may have been spilled, tracked, or blown onto adjacent streets or areas. Also see MM BIO-10. • The Property Owner/Developer shall obtain a transportation permit pursuant to applicable laws and regulations for oversized loads which will list the applicable haul routes and haul hours. All hauling or transport of oversized loads shall occur between the hours of 8:30 AM and 3:30 PM only, Monday through Friday, unless approved otherwise by the City Engineer. No hauling or transport shall be allowed during nighttime hours, weekends or Federal holidays. • Include details on the reasonable maintenance of existing bicycle and pedestrian facilities and connectivity through the Project Site during construction to the reasonable satisfaction of the City Engineer. • Require that haul trucks entering or exiting public streets shall at all times yield to public traffic, pedestrians, bicyclists, and other users. • Provisions for the Contractor to repair existing pavement, streets, curbs, sidewalks, and/or gutters that may be damaged during Project construction. The repairs shall be completed in consultation with and to the reasonable satisfaction of the City Engineer. • Require that all construction-related parking and staging of vehicles shall be kept out of the adjacent public roads and shall occur either on-site or on designated off-site parcels that would not adversely affect access to or parking for nearby residences or businesses. <p>MM HAZ-5 Prior to issuance of a certificate of occupancy for the first multiple-family residential unit, the Property Owner/Developer shall fund and implement closed-circuit television (CCTV) cameras at Imperial Highway/Santa Ana Canyon Road, Anaheim Hills Road/Santa Ana Canyon Road, Fairmont Boulevard/Santa Ana Canyon Road, Deer Canyon Road/Santa Ana Canyon Road, Festival Drive/Santa Ana Canyon Road, and Weir Canyon Road/Santa Ana Canyon Road.</p>	
Section 4.16 - Tribal Cultural Resources			
<p>a) 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, sacred place, or object with cultural value to a California Native American tribe, and that is:</p> <p style="padding-left: 20px;">i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k), or</p>	Less Than Significant Impact	None	Less Than Significant Impact

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<p>a) 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, sacred place, or object with cultural value to a California Native American tribe, and that is:</p> <p>ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resource Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p>	<p>Significant Impact</p>	<p>MM TCR-1 Prior to the issuance of the first grading permit, the Property Owner/Developer or contractor as designee shall provide evidence in the form of an executed Agreement to the City of Anaheim Planning and Building Department that they have retained a qualified Native American tribal monitor to provide third-party monitoring (Monitor) during specified excavation and grading activities and to evaluate any previously unknown TCRs that are discovered during Project ground-disturbing activities, and also to provide recommended mitigation measures, such as, for example, recovery and catalogue, as necessary to the extent the find is determined to be significant. The Monitor shall be from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation, and shall be a qualified professional based on generally accepted professional qualifications and/or certifications, as may be applicable.</p> <p>The Agreement shall include (i) professional qualifications of Monitor; (ii) a reasonably detailed scope of services to be provided including but not limited to pre-construction education, observation, evaluation, protection, salvage, notification, and/or curation requirements, as applicable, with final documentation/report to Public Works Inspector; (iii) contact information; (iv) communication protocols between Contractor and Monitor for scheduling to facilitate timely performance; (v) acknowledgment that if the Monitor is unavailable or unresponsive based on terms stipulated in the Agreement, Property Owner/Developer or Contractor as designee may contract with another qualified Monitor reasonably acceptable to the City.</p> <p>The cover sheet of the grading plans shall include a note to identify that (a) third party monitoring for tribal cultural resources is required during specified excavation and grading activities in accordance with the Agreement; and (b) contact information for the Tribe-approved Monitor shall be provided by the Contractor to the City inspector at the pre-construction meeting.</p> <p>MM CUL-1 Prior to the issuance of the first grading permit for each Project phase (i.e., the multiple-family, commercial and single-family components, respectively), the Property Owner/Developer shall provide written evidence to the City that the Property Owner/Developer has retained a qualified archaeologist who meets the Secretary of the Interior’s Professional Qualification standards for archaeology to observe grading activities within previously undisturbed soils, and to evaluate any previously unknown archaeological resources (if any), as necessary, which are discovered during Project construction. The archaeologist shall be present at the pre-grade conference, shall establish procedures for archaeological resource surveillance within previously undisturbed soils, and shall establish, in cooperation with the Property Owner/Developer, procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the artifacts, as appropriate pursuant to applicable laws and regulations. If soils cannot be shown in geotechnical reports or by other means to have been previously disturbed, archaeological monitoring shall be conducted. If archaeological resources are inadvertently unearthed during excavation or other ground-disturbing activities, the contractor shall immediately cease all earth-disturbing activities within a 100-foot radius of the area of discovery and the archaeologist and City shall be notified immediately. If the City, in consultation with the archaeologist, determines the archaeological resources to be significant, then the qualified archaeologist shall make recommendations to the City on the feasible measures that shall be implemented to protect the discovered resource(s), including, but not limited to, exploration, excavation, and/or salvage in accordance with State CEQA Guidelines Section 15064.5. Any previously undiscovered resource(s) found during construction within the Project Site shall be recorded on appropriate California Department of Parks and Recreation (DPR) forms.</p> <p>If the relevant resource(s) (if any) are determined to be historical resources as defined under CEQA Guideline Section 15064.5 or a unique archaeological resource in Public Resources Code Section 21083.2, feasible mitigation measures and an archaeological treatment plan shall be developed by the qualified Archaeologist and recommended to the Property Owner/Developer and the City. Appropriate mitigation measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the find(s) as detailed in the archaeological</p>	<p>Less Than Significant With Mitigation Incorporated</p>

**TABLE 1-1
SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Impact Before Significance	Mitigation Measures	Level of Significance After Mitigation
		treatment plan. After the find has been appropriately and feasibly avoided or mitigated, work in the area shall be permitted to resume.	
Section 4.17 – Utilities and Service Systems			
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.	Less Than Significant Impact	None	Less Than Significant Impact
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.	Less Than Significant Impact	None	Less Than Significant Impact
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.	Less Than Significant Impact	None	Less Than Significant Impact
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.	Less Than Significant Impact	None	Less Than Significant Impact
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.	Less Than Significant Impact	None	Less Than Significant Impact
Section 4.18 – Wildfire			
a) Substantially impair an adopted emergency response plan or emergency evacuation plan.	Significant Impact	<p>MM HAZ-4 Prior to the issuance of each grading permit, a Construction Management Plan shall be prepared by the Property Owner/Developer for the review and approval of the City of Anaheim. The Construction Management Plan shall be prepared in accordance with the applicable requirements contained in the Manual on Uniform Traffic Control Devices (MUTCD). Construction activities shall comply with the approved Construction Management Plan to the reasonable satisfaction of the City of Anaheim. The Property Owner/Developer shall begin coordination with the City on the Construction Management Plan as soon as practicable during the final design process and in advance of construction so that effective measures can be developed to avoid, minimize, and mitigate, to the extent feasible, construction impacts to parking and circulation on-site and in the vicinity of the Project Site.</p> <p>At a minimum, the Construction Management Plan shall:</p> <ul style="list-style-type: none"> Describe the durations and locations of any temporary lane closures that are needed on Santa Ana Canyon Road. Describe the traffic control measures that would be implemented for any temporary lane closures or other disruptions to traffic that would result from Project construction. Identify the routes that construction vehicles shall utilize for the delivery of construction materials to access the Project Site and for egress from the Project Site. 	Less Than Significant With Mitigation Incorporated

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SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES AND LEVEL OF SIGNIFICANCE**

Threshold of Significance	Impact Before Significance	Mitigation Measures	Level of Significance After Mitigation
		<ul style="list-style-type: none"> • Identify the location of parking and materials storage for construction workers during all phases of construction. Parking for construction workers shall be provided on-site or at additional off-site locations that are not on public streets. Also see MM BIO-13. • Identify emergency access points and emergency access routes to allow for adequate emergency access to/within the Project Site and to parcels to the south of the Project Site throughout all Project construction phases. • Specify the hours during which transport activities can occur and methods to mitigate construction-related impacts to adjacent streets. • Requirements that the Contractor keep all haul routes reasonably clean and free of debris including but not limited to gravel and dirt as a result of its operations. The Contractor shall take reasonable and diligent steps to clean adjacent streets of any material which may have been spilled, tracked, or blown onto adjacent streets or areas. Also see MM BIO-10. • The Property Owner/Developer shall obtain a transportation permit pursuant to applicable laws and regulations for oversized loads which will list the applicable haul routes and haul hours. All hauling or transport of oversized loads shall occur between the hours of 8:30 AM and 3:30 PM only, Monday through Friday, unless approved otherwise by the City Engineer. No hauling or transport shall be allowed during nighttime hours, weekends or Federal holidays. • Include details on the reasonable maintenance of existing bicycle and pedestrian facilities and connectivity through the Project Site during construction to the reasonable satisfaction of the City Engineer. • Require that haul trucks entering or exiting public streets shall at all times yield to public traffic, pedestrians, bicyclists, and other users. • Provisions for the Contractor to repair existing pavement, streets, curbs, sidewalks, and/or gutters that may be damaged during Project construction. The repairs shall be completed in consultation with and to the reasonable satisfaction of the City Engineer. • Require that all construction-related parking and staging of vehicles shall be kept out of the adjacent public roads and shall occur either on-site or on designated off-site parcels that would not adversely affect access to or parking for nearby residences or businesses. <p>MM HAZ-5 Prior to issuance of a certificate of occupancy for the first multiple-family residential unit, the Property Owner/Developer shall fund and implement closed-circuit television (CCTV) cameras at Imperial Highway/Santa Ana Canyon Road, Anaheim Hills Road/Santa Ana Canyon Road, Fairmont Boulevard/Santa Ana Canyon Road, Deer Canyon Road/Santa Ana Canyon Road, Festival Drive/Santa Ana Canyon Road, and Weir Canyon Road/Santa Ana Canyon Road.</p> <p>MM HAZ-9: Prior to issuance of a certificate of occupancy, the Property Owner/Developer shall participate through the payment of a fair share contribution to Anaheim Fire and Rescue to support education and outreach including community exercises in support of "Know Your Way" evacuation planning and protocols.</p>	
<p>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.</p>	<p>Significant Impact</p>	<p>MM HAZ-4 Prior to the issuance of each grading permit, a Construction Management Plan shall be prepared by the Property Owner/Developer for the review and approval of the City of Anaheim. The Construction Management Plan shall be prepared in accordance with the applicable requirements contained in the Manual on Uniform Traffic Control Devices (MUTCD). Construction activities shall comply with the approved Construction Management Plan to the reasonable satisfaction of the City of Anaheim. The Property Owner/Developer shall begin coordination with the City on the Construction Management Plan as soon as practicable during the final design process and in advance of construction so that effective measures can be</p>	<p>Less Than Significant With Mitigation Incorporated</p>

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Threshold of Significance	Impact Before Significance	Mitigation Measures	Level of Significance After Mitigation
		<p>developed to avoid, minimize, and mitigate, to the extent feasible, construction impacts to parking and circulation on-site and in the vicinity of the Project Site.</p> <p>At a minimum, the Construction Management Plan shall:</p> <ul style="list-style-type: none"> • Describe the durations and locations of any temporary lane closures that are needed on Santa Ana Canyon Road. • Describe the traffic control measures that would be implemented for any temporary lane closures or other disruptions to traffic that would result from Project construction. • Identify the routes that construction vehicles shall utilize for the delivery of construction materials to access the Project Site and for egress from the Project Site. • Identify the location of parking and materials storage for construction workers during all phases of construction. Parking for construction workers shall be provided on-site or at additional off-site locations that are not on public streets. Also see MM BIO-13. • Identify emergency access points and emergency access routes to allow for adequate emergency access to/within the Project Site and to parcels to the south of the Project Site throughout all Project construction phases. • Specify the hours during which transport activities can occur and methods to mitigate construction-related impacts to adjacent streets. • Requirements that the Contractor keep all haul routes reasonably clean and free of debris including but not limited to gravel and dirt as a result of its operations. The Contractor shall take reasonable and diligent steps to clean adjacent streets of any material which may have been spilled, tracked, or blown onto adjacent streets or areas. Also see MM BIO-10. • The Property Owner/Developer shall obtain a transportation permit pursuant to applicable laws and regulations for oversized loads which will list the applicable haul routes and haul hours. All hauling or transport of oversized loads shall occur between the hours of 8:30 AM and 3:30 PM only, Monday through Friday, unless approved otherwise by the City Engineer. No hauling or transport shall be allowed during nighttime hours, weekends or Federal holidays. • Include details on the reasonable maintenance of existing bicycle and pedestrian facilities and connectivity through the Project Site during construction to the reasonable satisfaction of the City Engineer. • Require that haul trucks entering or exiting public streets shall at all times yield to public traffic, pedestrians, bicyclists, and other users. • Provisions for the Contractor to repair existing pavement, streets, curbs, sidewalks, and/or gutters that may be damaged during Project construction. The repairs shall be completed in consultation with and to the reasonable satisfaction of the City Engineer. • Require that all construction-related parking and staging of vehicles shall be kept out of the adjacent public roads and shall occur either on-site or on designated off-site parcels that would not adversely affect access to or parking for nearby residences or businesses. <p>MM HAZ-5 Prior to issuance of a certificate of occupancy for the first multiple-family residential unit, the Property Owner/Developer shall fund and implement closed-circuit television (CCTV) cameras at Imperial Highway/Santa Ana Canyon Road, Anaheim Hills Road/Santa Ana Canyon Road, Fairmont Boulevard/Santa Ana Canyon Road, Deer Canyon Road/Santa Ana Canyon Road, Festival Drive/Santa Ana Canyon Road, and Weir Canyon Road/Santa Ana Canyon Road.</p>	

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Threshold of Significance	Impact Before Significance	Mitigation Measures	Level of Significance After Mitigation
		MM HAZ-9: Prior to issuance of a certificate of occupancy, the Property Owner/Developer shall participate through the payment of a fair share contribution to Anaheim Fire and Rescue to support education and outreach including community exercises in support of "Know Your Way" evacuation planning and protocols.	
c) Require 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.	Less Than Significant Impact	None	Less Than Significant Impact
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 change.	Less Than Significant Impact	None	Less Than Significant Impact

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