
4.1 AESTHETICS

4.1.1 EXISTING CONDITIONS

Visual Character

Visual character in the California Environmental Quality Act (CEQA) context is an impartial description of defining physical features, landscape patterns, and distinctive physical qualities within a landscape. Visual character is informed by the composition of land, vegetation, water, and structures and their relationship (or dominance) to one another, and by prominent elements of form, line, color, and texture that combine to define the composition of views. Visual character-defining resources and features within a landscape may derive from notable landforms, vegetation, land uses, building design and façade treatments, transportation facilities, overhead utility structures and lighting, historic structures or districts, or panoramic open space.

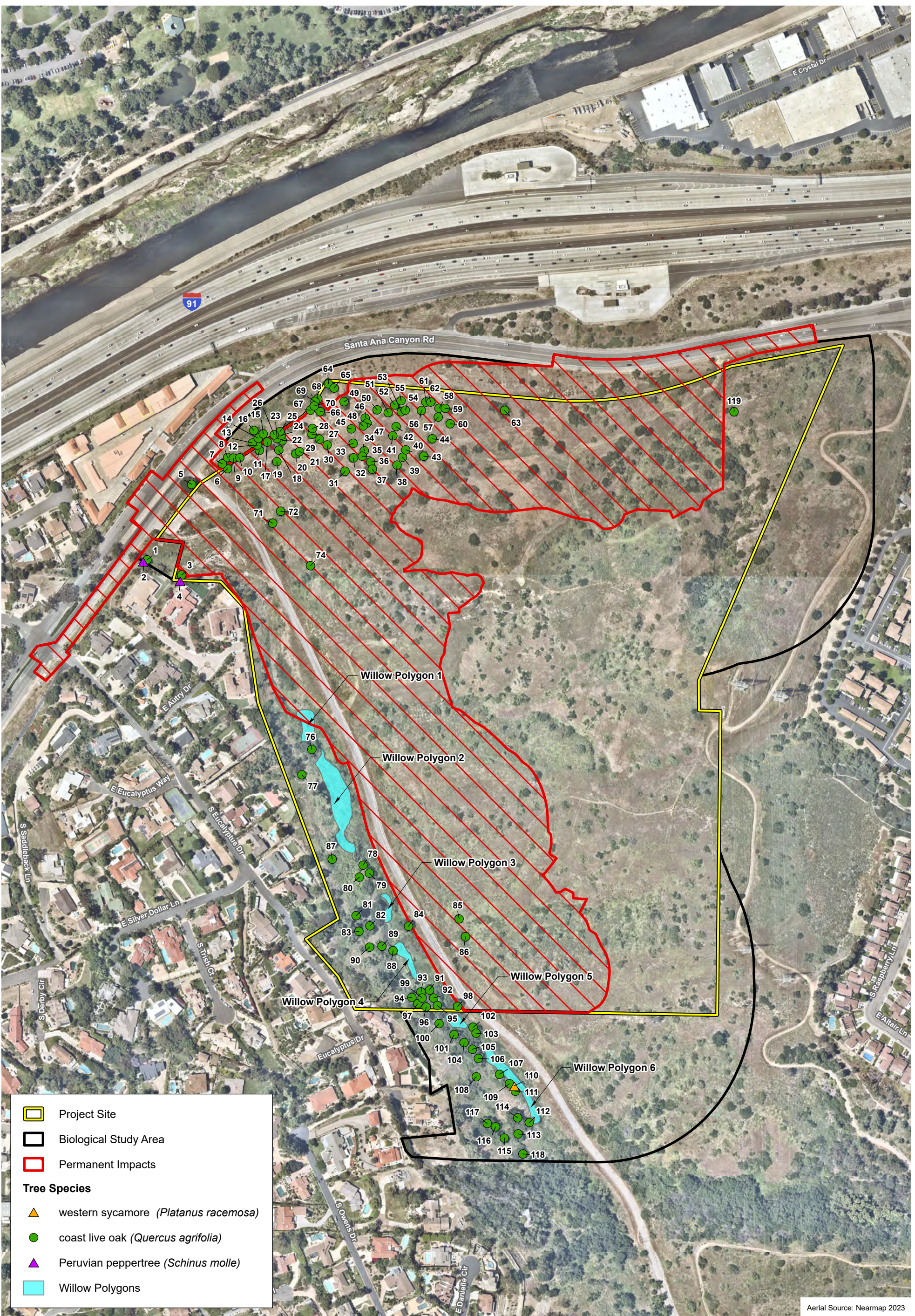
Project Site

The Project Site consists mostly of undeveloped properties. No buildings are currently located within the Project Site. There is a paved access road that is located within the western portion of the Project Site that connects to Santa Ana Canyon Road in the north. There are also dirt access roads throughout the Project Site (NETR Online 2024a). There is an existing underground 96-inch storm drain and sewer line that traverse the Project Site in the north-south direction that was installed to service residential developments to the south of the Project Site. There are no other existing utilities on-site.

Elevations within the Project Site range from approximately 600 feet above mean sea level (msl) in the southeast portion of the Project Site to approximately 330 feet above msl at the northwest boundary of the Project Site along Santa Ana Canyon Road. The topography within the Project Site consists of rolling hills and several steep sided hilltops and ridgelines located in the eastern and western portions of the Project Site. The Project Site is situated along and within Deer Canyon, which drains to the north towards the Santa Ana River with canyon walls ascending to the east and west (Group Delta 2023a).

A variety of vegetation types occur in the Project Site, including the following vegetation communities: sagebrush – black sage scrub; sagebrush – black sage scrub/ruderal; coyote brush scrub; toyon – sumac chaparral; toyon – sumac chaparral/ruderal; ruderal; disturbed ruderal; coastal freshwater marsh; poison oak scrub; southern willow scrub; mulefat scrub; southern coast live oak riparian forest; Mexican elderberry woodland; non-native woodland; xeric cliff face; developed areas; and disturbed areas (Psomas 2023a).

A total of approximately 119 individual trees were documented within the Project Site, along with approximately 6 clusters of willow scrub as shown on Exhibit 4.1-1. Of these approximately 119 trees, approximately 117 meet the definition of a specimen tree pursuant to the AMC, consisting of 114 coast live oaks (*Quercus agrifolia*), two Peruvian pepper trees (*Schinus molle*) and one western sycamore (*Platanus racemosa*). These trees generally occur



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Aerial Source: Nearmap 2023

	Project Site
	Biological Study Area
	Permanent Impacts
Tree Species	
	western sycamore (<i>Platanus racemosa</i>)
	coast live oak (<i>Quercus agrifolia</i>)
	Peruvian peppertree (<i>Schinus molle</i>)
	Willow Polygons

Tree Inventory

Hills Preserve Project

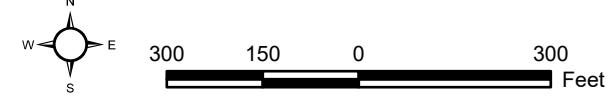


Exhibit 4.1-1



in three separate areas on the Project Site, which include: (1) along the northern Project Site boundary on north-facing slopes; (2) within the canyon area that runs along the western site boundary; and (3) near the base of side canyons that drain toward the larger canyon in the western portion of the Project Site. Also, six separate areas containing patches of willow scrub habitat were mapped within the channel that runs along the western boundary of the Project Site. These areas contain numerous Goodding's black willow (*Salix gooddingii*) trees and saplings, which are growing in dense clusters.

Because there are no buildings on-site, there is no existing lighting or glare sources within the Project Site.

Project Vicinity

There are approximately eight existing streetlights outside of and adjacent to the Project Site, along its frontage with Santa Ana Canyon Road.

There are SCE transmission line towers outside of and adjacent to the Project Site, to the east.

Scenic Resources

Scenic resources typically involve prominent, unique, and identifiable natural features in the environment (e.g., trees, rock outcroppings, islands, ridgelines, channels of water, and aesthetically appealing open space), and/or cultural features or resources, such as regional or architecturally distinctive buildings or structures that serve as a focal point of interest.

Project Site

As noted below, the Project Site is visible from State Route (SR) 91, which is designated as a State Scenic Corridor. Also, the Project Site is within and visible from the City's Scenic Corridor Overlay Zone.

The Project Site is located between a local scenic corridor (Santa Ana Canyon Road) and a scenic highway (SR-91) to the north.

Views

Views may be generally described as panoramic views of a large geographic area for which the field of view can be wide and extend into the distance. Associated vantage points provide an orientation from publicly accessible locations. Examples of distinctive views include urban skylines, valleys, mountain ranges, or large bodies of water.

Project Site

There are public views of the Project Site from viewpoints including Santa Ana Canyon Road, SR-91, the Santa Ana River Trail, and Yorba Regional Park to the north. The Project Site is also visible from Deer Canyon Park Preserve to the south and from public roads immediately west of the Project Site including Eucalyptus Drive.

Light and Glare

In the context of CEQA, light is nighttime illumination that stimulates sight and makes things visible; glare may be defined as difficulty seeing in the presence of bright light, such as direct or reflected sunlight.

Project Site

As noted above, because there are no buildings on-site and it is primarily undeveloped, there are no sources of permanent lighting or glare.

Project Vicinity

As noted above, there are approximately eight existing streetlights outside of and adjacent to the Project's frontage with Santa Ana Canyon Road. The primary sources of nighttime light in the surrounding area are from vehicle headlights traveling along Santa Ana Canyon Road and SR-91, as well as other surrounding roadways. There are also streetlights and buildings with outdoor security lighting in the Project vicinity.

4.1.2 REGULATORY SETTING

State

California Department of Transportation State Scenic Highway Program

The California Scenic Highway Program, created in 1963 by the California legislature, is managed by the California Department of Transportation (Caltrans). The goal of the program is to preserve and protect scenic highway corridors from changes that would negatively impact the aesthetic quality of lands that are adjacent to highways. Caltrans defines a scenic highway as any freeway, highway, roadway, or other public right-of-way that passes through an area of valuable scenic quality. Qualification for designation as a State Scenic Highway is based on vividness, intactness, and unity. The State Scenic Highway System includes a list of highways that are either eligible for designation as scenic highways or have been officially designated.

The state highway corridor protection program seeks to encourage quality development that does not degrade scenic value of corridors. Minimum requirements for scenic corridor protection include:

- Regulation of land use and density of development
- Detailed land and site planning
- Control of outdoor advertising (including a ban on billboards)
- Careful attention to and control of earthmoving and landscaping

A 4.5-mile segment of SR-91 is an officially designated State Scenic Highway from SR-55 to west of the Weir Canyon Road interchange. SR-91 is located approximately 0.1-mile north of the Project Site. The Project Site is not visible from any other designated State Scenic Highways besides SR-91 (Caltrans 2023a).

Title 24 of the California Code of Regulations Building Energy Efficiency Standards

California Building Code (California Code of Regulations [CCR], Title 24)—including Title 24, Part 6— includes Section 132 of the Building Energy Efficiency Standards, which regulates lighting characteristics, such as maximum power and brightness, shielding, and sensor controls to turn lighting on and off. Different lighting standards are set by classifying areas by lighting zone. The classification is based on population figures of the 2000 Census. Areas can be designated as LZ1 (dark), LZ2 (rural), or LZ3 (urban). Lighting requirements for dark and rural areas are stricter, to protect the areas from the introduction of new sources of light pollution and light trespass.

Local

City of Anaheim General Plan – Community Design Element

The Community Design Element of the City’s General Plan helps to establish a positive and strong community identity for the City of Anaheim (City of Anaheim 2004a). The Community Design Element provides policy guidance in visually unifying the diverse areas of the City through carefully crafted design policies.

The Community Design Element includes a map with community design districts, which are general areas of the City with common design features and characteristics. As defined by the City in the Community Design Element, the Project Site is located within the Hill and Canyon Area community design district. The one goal that is directly applicable to the Hill and Canyon Area is Goal 21.1, which is: “(To) preserve the Hill and Canyon Area’s sensitive hillside environment and the community’s unique identity.” As described in Figure CD-1 of the Community Design Element, some of the City’s key points of focus for the Hill and Canyon Area community design district include:

- (To) reinforce the natural environment of the area through appropriate landscaping and the preservation of open space;
- (To) preserve views and ridgelines;
- (To) incorporate natural aesthetics into design; and
- (To) reinforce quality development standards and guidelines compatible with the hillside area.

The Community Design Element provides guidance for the City’s built environment and it includes goals and policies related to aesthetics that are relevant to this analysis. The

applicable goals and policies from the Community Design Element are provided in Table 4.10-1 of Section 4.10, Land Use and Planning.

City of Anaheim General Plan – Land Use Element

The Land Use Element of the City’s General Plan divides the City into community policy areas, along with goals and policies for each community policy area with the goal of creating, preserving, and enhancing these areas of the City. The Project Site is within the Hill and Canyon Area community policy area. The goals and policies that are relevant to this analysis from the Land Use Element are provided in Table 4.10-1 of Section 4.10, Land Use and Planning, with a Project consistency analysis.

City of Anaheim General Plan – Green Element

The Green Element of the City’s General Plan aims to use a variety of open space opportunities and resources to create a unified vision for a more beautiful, healthy city (City of Anaheim 2004b).

There are areas in the western and southern portions of the Project Site that are depicted as “Open Space” in Figure G-1 of the City’s Green Element. Figure G-1 of the Green Element also depicts a “Riding/Hiking, Pedestrian and Mountain Bike Trail” along Deer Canyon Parkway from Santa Ana Canyon to the south. The figure also depicts a “Riding/Hiking, Pedestrian and Mountain Bike Trail” north of the Project Site along Santa Ana Canyon Road.

The Green Element includes goals and policies related to hillside development and grading as well as ridgelines, views, and vistas, landscaping, and street trees. The goals and policies that are relevant to this analysis from the Green Element are provided in Table 4.10-1 of Section 4.10, Land Use and Planning, with a Project consistency analysis.

City of Anaheim General Plan – Circulation Element

The Circulation Element of the City’s General Plan includes a goal and policies related to State-designated scenic highways. The goals and policies that are applicable to the Project from the Circulation Element are provided in Table 4.10-1 of Section 4.10, Land Use and Planning, with a Project consistency analysis.

Anaheim Municipal Code

Scenic Corridor Overlay Zone

The entire Project Site is within the City’s Scenic Corridor Overlay Zone. The purpose of the Scenic Corridor Overlay Zone is to provide for and promote orderly growth in certain areas of the City designated as being of distinctive, scenic importance, while implementing local governmental agency actions for the protection, preservation, and enhancement of the unique and natural scenic assets of these areas as a valuable resource to the community. The City’s Scenic Corridor Overlay Zone has been designated as an area of distinctive natural and rural beauty, characterized and exemplified by the interrelationship between such primary

natural features as the rolling terrain, winding river, Specimen Trees, and the profusion of natural vegetation. As detailed further below, Chapter 18.18 of the AMC provides regulations for parcels that are located within the City's Scenic Corridor Overlay Zone; these address, for example, requirements related to setbacks, parking location, height, and roof mounted equipment.

Tree preservation procedures for the City's Scenic Corridor Overlay Zone are provided in AMC Section 18.18.040 with the purpose of preserving the natural beauty of the Santa Ana Canyon environment, to increase the visual identity and quality of the area, and to protect the remaining natural amenities from premature removal or destruction. Also, Section 18.18.040 of the AMC includes provisions for issuance of tree removal permits and replacement tree planting.

The AMC defines specimen trees as "any tree of the *Quercus* varieties (Oak) with a trunk measuring twenty-five (25) inches or greater in circumference; or any tree of the *Schinus* varieties (Pepper) and *Platanus* varieties (Sycamore), with trunks measuring fifty (50) inches or greater in circumference; measurements of circumference shall be taken at a point four (4) feet above ground level."

As required by AMC Section 18.18.040, impacted specimen trees would require the issuance of a Specimen Tree Removal Permit by the City. As part of the permit process, the City requires that replacement trees be planted on the same parcel or in the public right-of-way located in the immediate vicinity, as directed by the City. Any replacement trees in the public right-of-way must be approved by the Department of Public Works. The replacement trees shall comply with the following provisions:

- The replacement trees shall be a minimum thirty-six (36) inch box size at time of planting, or larger if appropriate to the tree unless the City Arborist approves a twenty-four (24) inch box size based on feasibility and site characteristics.
- The number of replacement trees shall be as identified in Table 18-A of AMC Section 18.18.040. For impacted specimen trees that are under 38" in circumference¹, one replacement tree is required per impacted specimen tree. For impacted specimen trees that are 38"-64" in circumference, two replacement trees are required per impacted specimen tree. For impact specimen trees that are over 64", three replacement trees are required per impacted specimen tree.
- Any replacement trees that are planted within the Project Site, which are subsequently removed, damaged, diseased and/or dies, shall be replaced in a timely manner in accordance with the provisions of the AMC.

¹ The circumference of trees is measured at four feet above ground level.

4.1.3 THRESHOLDS OF SIGNIFICANCE

The following significance criteria, included for analysis in this Draft EIR, are based on the City of Anaheim's Environmental Checklist. Except as provided in Public Resource Code Section 21099, impacts to aesthetics would be significant if the Project would:

- a) Have a substantial adverse effect on a scenic vista.
- a) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
- b) 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.
- c) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.

In terms of methodology, in conducting this analysis and applying the above-referenced thresholds, Psomas evaluated potential Project impacts on aesthetics, light, and glare through site reconnaissance and review of applicable plans, policies, data, and information. Psomas personnel visited the Project Site; and reviewed aerial photographs, topographical maps, street maps, Project plans, and elevations to identify surrounding land uses and evaluate potential impacts from the proposed Project. The Anaheim General Plan, the AMC, and the Project's proposed Specific Plan were reviewed to determine applicable policies and design requirements for the Project. Project plans and design guidelines were reviewed to determine compliance with the requirements of the General Plan, Municipal Code and other applicable provisions. In addition, visual renderings were created to illustrate the proposed Project's potential impact on aesthetics resources.

4.1.4 IMPACT ANALYSIS

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

Less Than Significant Impact. A scenic vista is generally defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the public. A substantial adverse effect to a scenic vista is one that substantially degrades the view from a designated viewing location (Caltrans 2024a).

According to Goal 2.1 contained in the Green Element of the City's General Plan, scenic vistas in the City include views of ridgelines, natural open space areas, the contours of the Hill and Canyon Area and the Santa Ana Mountains, golf courses, and the Santa Ana River (City of Anaheim 2004b). The Project Site contains ridgelines and natural open space areas, which meet the definition of scenic resources pursuant to the City's Green Element. Therefore, this threshold response provides an evaluation as to whether views of ridgelines and natural open space areas would be substantially adversely affected by the Project.

The Project Site is visible from a City-designated scenic corridor, Santa Ana Canyon Road, and a State-designated scenic highway, SR-91, which are both to the north of the Project Site. The Project Site is also visible from public viewpoints on Eucalyptus Drive, Yorba Regional Park, Santa Ana River Trail, and Deer Canyon Park Preserve.

In general terms, to minimize impacts to scenic resources, the Project's buildings have been sited and the grading approach has been developed so that the more visually significant ridgelines and hilltops on the Project Site would not be developed. Instead, these upper elevations of the Project Site would be zoned as Open Space and would be retained as undeveloped areas, thereby helping to retain the existing scenic, open space qualities as visual resources. Specifically, as depicted in Exhibit 4.1-2, approximately 57% of the Project Site would be retained in its existing open space state, with the proposed residential and commercial elements clustered into a smaller overall footprint, taking into account topographical constraints and protecting the top of ridgelines in the Project Site.

In doing so, the Project would generally preserve public views of existing backdrop ridgelines from off-site perspectives, particularly from Santa Ana Canyon Road and SR-91, with the addition of new structures being clustered at the lower elevations of the Project Site in the foreground of most of these views. This substantial retention of the natural landscape outside of the development footprint would be accomplished through the export of soil from the Project Site and through the construction of retaining walls, which allows for the establishment of building pads.

Slopes that would be disturbed during construction would be stabilized and re-planted in accordance with a detailed landscape plan to be reviewed and approved by the City in coordination with the Project's Specimen Tree Removal Permit requirements.

As shown in the Project's overall site plan which is provided above as Exhibit 3-6, the Project would include a total of approximately 11.50 acres of landscaped areas (BrightView 2023a).

Overall, the Project would include the removal of approximately 73 specimen trees pursuant to the AMC, consisting entirely of coast live oak (*Quercus agrifolia*). The Project would also remove approximately 0.05 acre of area containing a dense patch of approximately 20 Goodding's black willow (*Salix gooddingii*) saplings, which are not specimen trees pursuant to the AMC. The Project would involve the planting of new trees pursuant to the Project's approved landscape plan, the City's applicable scenic corridor requirements, and applicable Specific Plan provisions. It is anticipated that the Project would plant and maintain approximately 485 new trees consisting of approximately 20 new trees at the pool deck and approximately 465 new trees at ground level. At a minimum, the Project would be required to plant a total of 175 replacement trees in accordance with Specimen Tree Removal Permit requirements contained in the AMC.

Implementation of the Project's proposed landscape plan would help to minimize visual effects of the Project.

Analyses related to the visual effects of the Project for viewers from specific public viewpoints are provided below.

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Source: Salt Development, 2024

Existing Aerial View Looking West Across SR-91 - Sheet A

Exhibit 4.1-2

Hills Preserve Project





Source: Salt Development, 2024

Proposed Aerial View Looking West Across SR-91 - Sheet B

Exhibit 4.1-2

Hills Preserve Project





Source: Salt Development, 2024

Existing SR-91 Eastbound View - Sheet C

Exhibit 4.1-2

Hills Preserve Project





Source: Salt Development, 2024

Proposed SR-91 Eastbound View - Sheet D

Exhibit 4.1-2

Hills Preserve Project





Source: Salt Development, 2024

Existing SR-91 Westbound View 1 - Sheet E

Exhibit 4.1-2

Hills Preserve Project



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Source: Salt Development, 2024

Proposed SR-91 Westbound View 1 - Sheet F

Exhibit 4.1-2

Hills Preserve Project





Source: Salt Development, 2024

Existing SR-91 Westbound View 2 - Sheet G

Exhibit 4.1-2

Hills Preserve Project



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Source: Salt Development, 2024

Proposed SR-91 Westbound View 2 - Sheet H

Exhibit 4.1-2

Hills Preserve Project



- **Visual Effects For Views From Santa Ana Canyon Road:** The Project Site is located along and is visible from public vantage points along Santa Ana Canyon Road, as it winds its way along the northern edge of the Project Site. Santa Ana Canyon Road is a City-designated Scenic Corridor and the Project Site is within a Scenic Corridor Overlay Zone.

As shown in the rendering provided as Exhibit 4.1-3, the Project's commercial and multiple-family residential structures would be prominently visible from a motorist's, pedestrian's, or bicyclists' perspective as they travel along Santa Ana Canyon Road. However, these structures have been designed so that they are below the existing ridgelines that are in the Project Site, which helps to preserve views of existing natural contours in the Project Site. Also, these views are most often experienced by individuals in vehicles that are traveling at approximately 40 miles per hour; therefore, these viewers are less sensitive to visual changes that occur on the Project Site.

A total of approximately 73 specimen trees as well as other vegetation would be removed from the Project Site to accommodate the Project. Many of these trees that would be removed are visible from Santa Ana Canyon Road. Once grading and construction are completed, the Project Site would be re-landscaped, which would minimize these visual effects. As detailed above and more fully in the Specific Plan, the Project would retain approximately 46 trees and would plant a minimum of 175 replacement trees. Also, the Project would include a total of approximately 11.50 acres of landscaped areas (BrightView 2023a).

The proposed seven story multiple-family residential building would be visible from Santa Ana Canyon Road, particularly from the proposed Santa Ana Canyon Road and Deer Canyon Road intersection. The multiple-family residential building would have a maximum height of 95 feet, although it would appear taller for viewers along Santa Ana Canyon Road given that the building would be built upslope of the roadway. The ten-story parking structure (including three subterranean levels) and the roof deck would not be visible from Santa Ana Canyon Road since they would be blocked by the building's frontage.

The multiple-family residential building would be built near the lowest elevations within the Project Site, which would minimize the visual intrusion of this structure. Moreover, the Project would be required to implement the detailed Development Standards and Design Guidelines contained in the Specific Plan. Implementation of same are intended to facilitate the creation of buildings and landscape character that is aesthetically pleasing, highly functional, and takes into appropriate consideration physical site characteristics and constraints.

Also, to reduce the height of the proposed multiple-family residential building relative to neighboring properties, the Project would require the removal of soil from the Project Site, the construction of retaining walls, and the construction of subterranean parking floors. With respect to the retaining walls, these are being constructed in order to appropriately incorporate the proposed uses into the

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Source: Salt Development, 2024

Existing Santa Ana Canyon Road Eastbound View - Sheet A

Exhibit 4.1-3

Hills Preserve Project





Source: Salt Development, 2024

Proposed Santa Ana Canyon Road Eastbound View – Sheet B

Exhibit 4.1 – 3

Hills Preserve Project





Source: Salt Development, 2024

Existing Santa Ana Canyon Road Westbound View 1 - Sheet C

Exhibit 4.1-3

Hills Preserve Project



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Source: Salt Development, 2024

Proposed Santa Ana Canyon Road Westbound View 1 - Sheet D

Exhibit 4.1-3

Hills Preserve Project



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Source: Salt Development, 2024

Existing Santa Ana Canyon Road Westbound View 2 - Sheet E

Exhibit 4.1-3

Hills Preserve Project





Source: Salt Development, 2024

Proposed Santa Ana Canyon Road Westbound View 2 - Sheet F

Exhibit 4.1-3

Hills Preserve Project



topography of the Project Site and to minimize, to the extent feasible, the amount of grading and soil export that would be needed otherwise. Retaining walls would be constructed in accordance with applicable development standards set forth in the Specific Plan and the AMC; to reduce visual impact, where feasible, walls would be stepped with slopes and v-ditches in between.

Views of the multiple-family residential building from this perspective would be partially obscured through the dense planting of trees within the Project Site at the northern portion of Project Driveway No. 1 (i.e., Deer Canyon Road). The Project would include enhanced landscaping such as new specimen and accent trees, an entry monument wall, landscaped center median, and accent paving. Also, as noted above, the Project would plant substantial numbers of new trees (as well as retain approximately 46 existing trees) and other landscaping north and south of this driveway in accordance with the City's Scenic Corridor requirements and applicable Specific Plan provisions. This entry elevation is depicted in Exhibit 3-12. Also, southeast of the proposed intersection of Deer Canyon Road and "A" Street, the Project would include a water feature basin with a cascading water feature, which would further obscure views from Santa Ana Canyon Road of the multiple-family residential building.

The commercial buildings would consist of two, three-story, approximately 40,000 gross square foot buildings that would be built upslope of Santa Ana Canyon Road. The Project's proposed commercial buildings would be similar in scale to other buildings along Santa Ana Canyon Road within the Scenic Corridor Overlay Zone, including the office parks located approximately 0.45-mile to the east near Roosevelt Road and approximately 0.77-mile to the northeast of the Project Site on Riverview Drive. These existing office buildings within the Scenic Corridor Overlay Zone were built with similar exterior buildings materials to those which are proposed for the Project's commercial and multiple-family residential buildings, such as reflective windows and polished exterior metal features.

Views of the commercial buildings from Santa Ana Canyon Road would be partially obscured by trees that would be planted along the east side of Santa Ana Canyon Road, as well as by proposed trees that would be planted on both sides of "A" Street within the Project Site.

Behind the commercial structure, a series of retaining walls would be built that would be visible to viewers on Santa Ana Canyon Road. By building these retaining walls, grading would be avoided upslope of the retaining walls, allowing for views to be maintained above and past the commercial building for viewers along Santa Ana Canyon Road. As note above and described further in the Specific Plan, retaining walls would be constructed in accordance with applicable development standards and would be stepped with slopes and v-ditches in between to reduce visual impacts.

In summary, views from Santa Ana Canyon Road would be altered by the construction of new buildings at the lower elevations of the Project Site. Viewers along the eastern portion of Santa Ana Canyon Road north of the Project Site would generally observe

natural contours, vegetated slopes, and ridgelines above the two proposed commercial buildings. Viewers along the western portion of Santa Ana Canyon Road would experience a greater visual effect, with the Project's proposed structures obstructing to a degree views of natural ridgelines and contours from this perspective. Trees and other vegetation that are currently visible from Santa Ana Canyon Road would be removed by the Project. However, all views of proposed buildings from Santa Ana Canyon Road would be obscured and enhanced through new tree plantings and other landscaping that would be planted as part of the Project.

- **Visual Effects For Views From SR-91:** As discussed in more detail below under threshold 4.1(a), a 4.5-mile segment of SR-91 is an officially designated State Scenic Highway from SR-55 to west of the Weir Canyon Road interchange. SR-91 is located approximately 0.1-mile north of the Project Site. The Project Site is visible intermittently for motorists on SR-91. Visual renderings of existing and proposed views of the Project Site from SR-91 are provided as Exhibit 4.1-2. From SR-91, the proposed commercial and multiple-family residential buildings would be partially visible; however, the views of ridgelines and natural contours in the background would still remain prominent for viewers looking at the Project Site from SR-91. Views of the Project Site from SR-91 that are further to the east would be more affected than views that occur to the west as the views to the west are already mostly obscured by the existing soundwall and other intervening structures.
- **Visual Effects For Views From Eucalyptus Drive:** The Project Site is partially visible from Eucalyptus Drive, which is just west of the Project Site. Views of the Project Site from this location are limited due to intervening structures, slopes, and vegetation. With implementation of the Project, viewers from Eucalyptus Drive would have views of the tops of the proposed new single-family residences within the Project Site, as shown in Exhibit 4.1-4. However, views beyond the proposed single-family residences to natural vegetation and ridgelines from this perspective would largely be retained. Also, views would be softened through implementation of a landscaping plan. This viewpoint would not have any views of the proposed multiple-family residential or commercial buildings.
- **Visual Effects For Views From Yorba Regional Park and Santa Ana River Trail:** The Project Site is visible in the distance from public vantage points north of the Project Site including from Yorba Regional Park and the Santa Ana River Trail. From these perspectives, viewers would see a partially developed Project Site with vegetated slopes leading up to the ridgelines that would be retained. Development would appear as an extension of residential and commercial development that already exists to the east and west of the Project Site and views of the ridgelines would not be impacted.
- **Visual Effects For Views From Deer Canyon Park Preserve:** The Project Site is located approximately 825 feet (0.16-mile) north of Deer Canyon Park Preserve, which contains ridgelines and other natural open space areas. The Project would not block any views of Deer Canyon Park Preserve from any public viewpoints due to existing topography.



Source: Salt Development, 2024

Existing View just North of 200 South Eucalyptus Road – Sheet A

Exhibit 4.1 –4

Hills Preserve Project





Source: Salt Development, 2024

Proposed View just North of 200 South Eucalyptus Road – Sheet B

Exhibit 4.1 –4

Hills Preserve Project



Deer Canyon Park Preserve contains several trails from which hikers, bicyclists, and other public users have vantage points that provide views north to the Project Site. Due to topography, once built there would only be limited views of one of the Project's proposed single-family residences from Deer Canyon Park Preserve.

Scenic Vistas and Resources Pursuant to the City's Community Design Element

The City's Community Design Element states that the topography of the Hill and Canyon Area, in which the Project occurs, requires special design attention and that residents in this area are proud of the natural, semi-rural setting and that residents have consistently expressed the desire to preserve open space, specimen trees, views, and vistas (City of Anaheim 2004a). The Community Design Element suggests that design guidelines be applied for projects in this portion of the City that respect the existing topography to enhance views to and from adjacent freeways, arterials, and streets.

Goal 21.1 of the Community Design Element is to "Preserve the Hill and Canyon Area's sensitive hillside environment and the community's unique identity". The Project Site is located in the "Hill and Canyon Area" of the City as referenced in this goal of the Community Design Element. Policies under Goal 21.1 of the City's Community Design Element include:

- Policy 1: (To) reinforce the natural environment of the area through appropriate landscaping and the preservation of open space.
- Policy 2: (To) require compliance with the Scenic Corridor Overlay Zone to reinforce quality development standards and guidelines compatible with the hillside area.

In furtherance of the Community Design Element's policies that are applicable to the Hill and Canyon Area of the City, including Goal 21.1, the Project has been designed and would be required to incorporate the following:

- Special Design Attention to Existing Topography: The Project's proposed buildings have been designed so that they would be visually integrated into the hilly terrain of the Project Site through the export of soil and the installation of retaining walls, which would clear way for building pads and minimize the appearance of the proposed buildings. This specific approach has been used to maintain existing topography in upslope portions of the Project Site to the extent feasible.
- Preservation of Natural, Semi-Rural Setting: The Project would introduce buildings onto the Project Site, which is currently undeveloped. Therefore, the Project would reduce the amount of natural areas within the Project Site when compared to existing conditions. Also, the Project would reduce the semi-rural setting of the Project's surroundings when compared to existing conditions through the introduction of new buildings that are developed at a greater development density than currently exist on the Project Site and on parcels in the nearby vicinity. The proposed buildings would be clustered to reduce the overall development footprint and external materials would be utilized for the Project's commercial and multiple-family residential buildings that evoke a Mid-century modern aesthetic in contrast to the

ranch houses or farmhouse exterior architecture that one would expect to see in a semi-rural setting. However, approximately 43.22 acres (approximately 57%) of the Project Site would be re-zoned as Open Space, which would help to maintain a degree of natural and semi-rural setting in the Project Site. These areas to be re-zoned as Open Space are the more visually-prominent ridgelines and slopes leading to ridgelines. Also, substantial landscaping in accordance with an approved landscape plan has been incorporated as part of the Project to minimize visual effects of the Project's buildings and the Project's proposed tree removals.

- Preservation of Open Space: The Project has been designed to minimize impacts to the upper portions of the Project Site that contain more visually-prominent slopes and ridgelines. These areas of the Project Site would be rezoned as open space, which would result in the retention of more than half of the Project Site in its existing open space condition, thereby maintaining its aesthetic and scenic qualities. Overall, the Project would result in approximately 43.22 acres of the Project Site being zoned as open space and approximately 32.79 acres being developed.
- Preservation of Trees: The Project would require the removal of approximately 73 specimen trees pursuant to the AMC, consisting entirely of coast live oak (*Quercus agrifolia*). The Project would also remove approximately 0.05 acre of area containing a dense patch of approximately 20 Goodding's black willow (*Salix gooddingii*) saplings, which are not specimen trees pursuant to the AMC; however, these trees contribute to the visual character of the Project Site nonetheless. The Project would require issuance of a Specimen Tree Removal Permit by the City, which would require replacement tree planting at a minimum ratio of 1:1, with larger trees requiring 2:1 or 3:1 replacement ratios for impacted trees as shown in Table 4.1-2. Overall, the Project would result in the planting of a minimum of 175 replacement trees that would minimize impacts related to the proposed tree removals. More information on this topic is provided in Section 4.3, Biological Resources.
- Preservation of Views and Vistas: Views from public vantage points of scenic resources such as ridgelines and vegetation within the Project Site would generally be maintained by the Project. Undeveloped open space areas within the Project Site would be reduced in size; therefore, there would be a reduction in the amount of scenic views and vistas when viewed from public vantage points. Views from the western portion of Santa Ana Canyon Road north of the Project Site would be affected the greatest by the Project as these viewers are at a lower elevation than the multiple-family residential building, which makes it appear taller. Therefore, for viewers from Santa Ana Canyon Road and Deer Canyon Road, the proposed multiple-family residential building would entirely obscure views of natural vegetation, contours, and ridgelines that are south of the proposed building, which are prominently visible from this vantage point on Santa Ana Canyon Road in pre-Project conditions. However, the Project's overall design has taken into appropriate account these considerations, by locating proposed buildings at lower elevations, clustering the proposed development to reduce the overall footprint, and retaining approximately 57% of the Project Site in its existing open space condition. In so doing, while the Project would involve the development of a mixed-use residential project on

previously undeveloped lands, its siting and design help to minimize impacts to views and vistas.

Further, the Project's proposed buildings would be similar in scale to other buildings along Santa Ana Canyon Road within the Scenic Corridor Overlay Zone, including the office parks located 0.45-mile to the east near Roosevelt Road and 0.77-mile to the northeast of the Project Site on Riverview Drive. These office buildings also use similar exterior building materials to those which are proposed for the Project's multiple-family residential building, such as reflective windows and polished exterior metal features.

Furthermore, the Anaheim Hills Festival commercial center is approximately 0.1-mile east of the Project Site, along Santa Ana Canyon Road, which is entirely developed with limited aspects about it that could be described as natural or semi-rural.

In summary, to minimize impacts to scenic resources, the Project's buildings have been sited and clustered and the grading approach has been developed so that the more visually significant ridgelines and hilltops on the Project Site would not be developed. Instead, these upper elevations of the Project Site would be zoned as Open Space. The Project would generally preserve public views of existing backdrop ridgelines from off-site perspectives, with the addition of new structures at the lower elevations of the Project Site in the foreground of most of these views. This retention of the natural landscape outside of the development footprint would be accomplished through the export of soil from the Project Site and through the construction of retaining walls that would allow for the development of building pads. The Project would minimize visual effects through replacement tree planting and re-landscaping of disturbed portions of the Project Site. However, the Project would result in reduced acreage of visible open space areas in the Project Site; reduced acreage of visible vegetated areas in the Project Site; and altered views of ridgelines, particularly for viewers at/near the intersection of Santa Ana Canyon Road at Deer Canyon Road who would no longer see ridgelines as they do in existing conditions. Overall, these effects would not constitute a substantial adverse effect on a scenic vista given that the Project would only change a limited amount of public viewpoints and many public views would remain of the ridgelines and natural open space areas that would be retained in the Project Site for other viewpoints from elsewhere along Santa Ana Canyon Road and from other vantage points.

The Project's consistency with other applicable policies from Land Use Element, Green Element, and the Community Design Element of the City's General Plan are provided in Section 4.10, Land Use and Planning.

Therefore, the Project would have a less than significant impact related to this threshold, and no mitigation is required.

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

Less Than Significant Impact. A 4.5-mile segment of SR-91 is an officially designated State Scenic Highway from SR-55 to west of the Weir Canyon Road interchange. SR-91 is located

approximately 0.1-mile north of the Project Site. The Project Site is visible intermittently for motorists on SR-91. Visual renderings of existing and proposed views of the Project Site from SR-91 are provided as Exhibits 4.1-2.

The Project would not remove any rock outcroppings or historic buildings.

Existing trees and other vegetation within approximately 32.79 acres of the Project Site would be removed, including a total of approximately 73 specimen trees pursuant to the AMC. However, the vegetation that would be removed is not prominently visible from most perspectives on SR-91. As required by the tree replacement ratios contained in the AMC, the Project would be required to plant a minimum of 175 replacement trees; moreover, the Project would be retaining approximately 46 existing trees and would be installing substantial additional landscaping, as discussed above (Psomas 2024a). The landscaping would provide for enhanced views of the Project Site from SR-91 and other public viewpoints.

Visual renderings of existing and proposed views of the Project Site from SR-91 are provided as Exhibits 4.1-2. As described further above, from SR-91, the proposed commercial and multiple-family residential buildings would be partially visible; however, the views of ridgelines and natural contours in the background would still remain prominent for viewers looking at the Project Site from SR-91. Views of the Project Site from SR-91 that are further to the east would be more affected than views that occur to the west as the views to the west are already mostly obscured by the existing soundwall and other intervening structures.

As shown in the rendering provided as Exhibit 4.1-2, the Project's commercial buildings would be visible from a motorist's perspective as they travel along SR-91. However, these structures have been designed so that they are below the existing ridgelines that are in the Project Site, which helps to preserve views of existing natural contours in the Project Site.

The Project would retain approximately 46 existing trees. However, a total of approximately 73 specimen trees as well as other vegetation would be removed from approximately 32.79 acres of the Project Site to accommodate the Project. Many of these trees that would be removed are visible from SR-91. Once grading and construction are completed, the Project Site would be re-planted with trees and re-landscaped, which would minimize these visual effects.

The commercial buildings would consist of two, three-story, approximately 40,000 gross square foot buildings that would be built upslope of SR-91. The Project's proposed commercial buildings would be similar in scale to other buildings along Santa Ana Canyon Road within the Scenic Corridor Overlay Zone.

Views of the commercial buildings from SR-91 would be partially obscured by trees that would be planted along the east side of Santa Ana Canyon Road, as well as by proposed trees that would be planted on both sides of "A" Street within the Project Site.

Behind the commercial structure, a series of retaining walls would be built that would be visible to viewers on Santa Ana Canyon Road. By building these retaining walls, grading

would be avoided upslope of the retaining walls, allowing for views to be maintained above and past the commercial building for viewers along SR-91. Retaining walls would be constructed in accordance with applicable development standards set forth in the Specific Plan and the AMC; to reduce visual impact, where feasible, walls would be stepped with slopes and v-ditches in between.

Also, as discussed in more detail below, new exterior lighting in the Project Site would be visible in the distance from SR-91; however, these new lights would be required to meet all applicable standards and would be similar to existing lighting that occurs in the immediate vicinity of the Project Site and elsewhere along Santa Ana Canyon Road. Therefore, the new exterior lighting would not substantially damage scenic views from SR-91.

In summary, SR-91 is an officially designated State Scenic Highway adjacent to the Project Site. The Project Site is visible intermittently for views from along SR-91. The Project would not remove any rock outcroppings or historic buildings but would remove vegetation on approximately 32.79 acres of the Project Site, with the remaining approximately 43.22 acres being retained in its existing open space condition. As discussed above, the Project would alter views from SR-91; however, through thoughtful site planning and by re-planting of trees and landscaping during construction, these visual effects to viewers along SR-91 would be minimized.

Therefore, the Project would have a less than significant impact related to this threshold, and no mitigation is required.

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

Less Than Significant With Mitigation Incorporated. The Project Site is located in an urbanized area of the City pursuant to Section 21071 of the Public Resources Code. Given that the Project Site is located in an urbanized area, the analysis for this threshold focuses on whether the Project would conflict with applicable zoning and other regulations governing scenic quality.

The Project Site contains an existing mix of General Plan land use designations which consist of Estate Density Residential; Low Density Residential; and Open Space. The Project Site has an existing mix of zoning designations that consist of Transition “T”, Single-Family Residential (7,200-square foot minimum lot size) “RS-2”, and Open Space (OS) (City of Anaheim 2023a), and is within the Scenic Corridor (SC) Overlay Zone.

The Project proposes to redesignate the Project Site under the City’s General Plan as Low Density Residential (5.30 acres); Medium Density Residential (14.17 acres); General Commercial (11,82 acres); and Open Space (43.22 acres) land uses.

To approve the Project, concurrent with the adoption of the specific plan for the Project the City Council would also need to reclassify the entirety of the Project Site as “Hills Preserve-Specific Plan” zoning designation, which would enable the implementation of the land use vision set forth in the Hills Preserve Specific Plan (Specific Plan). As detailed more fully in the Specific Plan, the Specific Plan would allow for land uses consisting of “Estate Residential”, “Medium Density Residential”, “Open Space”, and “General Commercial”.

Chapter 18.18.060 prescribes development standards for the height of single-family uses within the SC Overlay Zone. The Project would include six lots for custom single-family homes and the proposed Specific Plan would explicitly be required to comply with the SC Overlay Zone, which include the SC Overlay Zone height standards.

Chapter 18.18.070 prescribes development standards for multiple-family uses within the SC Overlay Zone, including standards for site area, setbacks and roof mounted equipment. The Project would be required to comply with applicable standards by providing greater site area and setbacks than required, and enclosing mechanical equipment within attic space.

Chapter 18.18.080 prescribes development standards for commercial uses within the SC Overlay Zone, including standards for setbacks, parking location, height, and roof mounted equipment. The Project would be mandated to comply with applicable standards by providing greater setbacks than required, locating parking areas outside of required landscape setbacks and providing landscape screening for said parking areas, limiting structural heights to less than required in the SC Overlay Zone, and screening of any rooftop equipment within and architecturally integrated “penthouse” located away from the edges of the roof to minimize visibility from public views. With respect to setback requirements, the Specific Plan would prescribe setback standards to incorporate an adequate setback from the limits of the Santa Ana Canyon Road improvements, with consideration of the excess right-of-way/City-owned parcel fronting Santa Ana Canyon Road (between the commercial buildings and the right-of-way). Therefore, the proposed commercial buildings would be setback a greater distance from the right-of-way than would otherwise be required by the SC Overlay Zone.

Also, the Project would involve authorization to deviate from the AMC for requirements pertaining to grading, retaining walls, public views, road standards, and equestrian trail standards, as discussed in more detail in the Specific Plan.² These proposed deviations are discussed in more detail within Section 4.10, Land Use and Planning.

As discussed in more detail in Section 4.10, Land Use and Planning, with implementation of **MM AES-3**, the Project would be consistent with the requirements for the Scenic Corridor Overlay Zone.

With implementation of the required standards and requirements as detailed in the Specific Plan, as well as with required incorporation of **MM AES-1**, **MM AES-2**, and **MM AES-3**, the Project would not conflict with applicable zoning or other regulations governing scenic

² With respect to deviations, pursuant to applicable AMC requirements, the Specific Plan sets forth the requested deviations being sought to implement the Project. With adoption of the Specific Plan, the City would be concurrently approving the requested deviations, which would then govern Project development.

quality and thus impacts would be less than significant in this regard. More supporting information is provided below.

Construction

The Project would involve construction activities that would create visual disruptions for viewers of the Project Site. Construction activities would involve the limited demolition of existing structures and roadways within the Project Site, grading, and construction of new buildings on a currently undeveloped Project Site. Due to the size, layout, and topography of the Project Site and existing off-site urban development, only a portion of future construction-related activities would be visible from public viewpoints at any given point in time, and these activities would be largely limited to those occurring along the Project Site's perimeters. To minimize Project effects on scenic vistas and views during construction and as required by **MM AES-1**, construction staging areas would be required to be enclosed with an 8-foot-tall or taller chain-link fence with privacy windscreen or similar materials. As required by **MM AES-1**, the Contractor would be required to ensure the maintenance of the screening material at all times and would be required to remove and replace sections of screening material that experience graffiti, wind, or other damage. The Contractor would be required to 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. With implementation of **MM AES-1**, active grading and other activities outside of the formal staging areas within the Project Site would be visible; however, these views of construction activity on the Project Site would be typical and temporary. Views of certain ridgelines and natural open space areas on the Project Site would be temporarily obscured by construction fencing, materials, and equipment.

Night lighting would be required for safety and security during construction that could temporarily and adversely affect nighttime scenic views of ridgelines and hillsides within the Project Site. Also, construction night lighting could result in indirect impacts on the behavioral patterns of nocturnal and crepuscular wildlife adjacent to the lighted areas, as described in more detail in Chapter 4.3, Biological Resources. As required by **MM AES-2**, the Contractor would be required to adhere to all applicable lighting standards and minimize the use of construction night lighting to the maximum extent feasible. Also, the Contractor would be required to 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. With implementation of **MM AES-2**, the effects of construction night lighting on scenic views would be no greater than the operational night lighting that would be built for the Project, both of which would not conflict with regulations governing scenic resources.

Tree Removals

The Project would result in direct impacts to trees within the Project Site in the following two ways:

1. **Tree removals** consisting of trees that occur within the Project impact boundary and those that occur immediately adjacent to the impact boundary. Though it is possible

some trees that are immediately adjacent to the impact boundary may be avoided, they are conservatively counted as removals in this analysis to provide an impact assessment that ensures the Project's tree impacts are not undercounted.

2. **Encroachments** which are trees that occur outside the Project impact boundary but are close enough that ground disturbing activities have the potential to extend within the critical root zone of these oaks, which is generally defined as extending five feet beyond the outer canopy limit. Trees in this category should have conspicuous fencing installed along their critical root zone to prevent unnecessary disturbance to their roots.

Trees that would be removed from the Project Site would alter its scenic quality from scenic viewpoints. Table 4.1.1 provides a summary of specimen trees that occur in the Project Site along with tree removals and potential encroachments. A summary of all collected data for specimen trees is provided in the tree survey report which is provided in the Biological Technical Report (Appendix F of this Draft EIR). As shown therein, approximately 46_ existing trees would be retained.

**TABLE 4.1-1
SPECIMEN TREES IMPACTED BY TYPE**

Tree Species	Tree Quantities			
	Total Existing (approx.)	To Be Removed (approx.)	Encroachments (approx.)	No Impact (approx.)
Coast live oak <i>Quercus agrifolia</i>	114	73	1	40
Western sycamore <i>Platanus racemosa</i>	1	0	0	1
Peruvian pepper <i>Schinus molle</i>	2	0	0	2
Total	117	73	1	43
Source: Psomas 2024a.				

The Project would require the removal of existing trees and other vegetation within the Project Site, including a total of approximately 73 specimen trees pursuant to the AMC.

In addition to the individual tree impacts shown above, the Project would remove a small (0.05-acre) area containing approximately 20 Goodding's black willow saplings (Psomas 2024a).

The Project would require issuance of a Specimen Tree Removal Permit by the City. The Project would require a minimum of 175 trees be planted to compensate for the proposed approximately 73 trees that would need to be removed during Project construction.

**TABLE 4.1-2
SPECIMEN TREES IMPACTED AND REPLACEMENT TREES REQUIRED**

Tree Species	Size Class	Total Impacted (approx.)	Replacement Ratio	Replacement Total (approx.)
coast live oak Quercus agrifolia	A	10	1:1	10
	B	24	2:1	48
	C	39	3:1	117
Total		73		175
Source: Psomas 2024a.				

Once graded and built, the Project Site would be re-planted and re-landscaped as shown in the Project's conceptual landscape plan provided as Exhibit 3-6, which would minimize visual effects.

Therefore, with adherence to all applicable development standards and design guidelines (including those relating to lighting, tree re-planting and landscaping) as well as the required implementation of **MM AES-1** and **MM AES-2** and with issuance of a Specimen Tree Removal Permit for the Project (pursued and approved in accordance with applicable provisions in the AMC), construction activities related to the Project would not conflict with applicable zoning and other regulations governing scenic quality.

Operations:

The Project requires the adoption of a Specific Plan, which includes design standards and guidelines that would govern scenic quality in Chapter 3 of that document, as well as details on other aspects of development of the Project.

The Design Vision for the Project is described in Section 4.2 of the Specific Plan as follows:

“Design emphasis is placed on building “form” and building “style.” Form in this context is determined by characteristics such as height, massing, roof line, and fenestration. Style can be identified as a historic period or theme. The architecture of The Hills Preserve multiple-family residential building is envisioned to draw on the “Mid-Century Modern” style. Key features to this style include clean lines, functionality and simplicity, indoor-outdoor relationship, flat planes and geometric shapes. Historically, Mid-Century Modern structures used a range of materials including steel, concrete, and glass. As such, the style enables the proposed Hills Preserve multi-family building to include large spans of windows which will maximize resident views; flat roofs which will accommodate roof deck activity; and building materials that bring a sense of airiness.”#

The single family homes will be custom designed, but the vision is for them to exude a unique and high quality architectural experience that is of same quality as the Hills Preserve multi-family structure.

The commercial buildings will be designed to generally be compatible with the rest of the Hills Preserve Specific Plan and suited for the needs of its tenants.”

The Project would be required to comply with the Specific Plan, which includes objective design standards that would help to govern scenic quality that relate to site design, building massing and articulation, architectural detailing, building form, materials and colors, and roof details.

The Specific Plan includes landscape design elements for the Project Site, including:

- Landscaping should complement the overall design theme through the careful use of color, texture, form, scale, and plant massing.
- Existing natural conditions and situations should be considered during the landscape design process.
- Drought tolerant and fire resistive plant material shall be incorporated as required.
- No single species should dominate the landscape palette.
- Trees, shrubs, groundcovers, grasses, and vines should be utilized in such a way as to complement and soften architecture and other hardscape elements.
- Plant materials having a variety of heights and textures to enhance the visual impact at the project entry point and building entry is encouraged.
- Landscape areas should be designed to “layer” plant material of varying height and scale to create depth, variety, and interest.

The Specific Plan contains details on requirements for aspects of the landscape within the Project Site, including: the Project entry; site lighting; retaining walls; and landscape materials.

Collectively, the architectural and landscape standards proposed for the Project would result in an orderly and uniform aesthetic for development that occurs within the Project Site that would serve to minimize Project effects related to scenic resources.

Community Design Element

As discussed above under threshold 4.1(a), to minimize impacts to scenic resources, the Project’s buildings have been sited and the grading approach has been developed so that the more visually significant ridgelines and hilltops on the Project Site would not be developed. Instead, these upper elevations of the Project Site would be zoned as Open Space. The Project would generally preserve public views of existing backdrop ridgelines from off-site

perspectives, with the addition of new structures at the lower elevations of the Project Site in the foreground of most of these views. This retention of the natural landscape outside of the development footprint would be accomplished through the export of soil from the Project Site and through the construction of retaining walls that would allow for the development of building pads. The Project would minimize visual effects through clustering, siting considerations, replacement tree planting and re-landscaping of disturbed portions of the Project Site. However, the Project would result in: reduced acreage of visible open space areas in the Project Site; reduced acreage of visible vegetated areas in the Project Site; and altered views of certain ridgelines, particularly for viewers at/near the intersection of Santa Ana Canyon Road at Deer Canyon Road who would no longer see certain ridgelines as they do in existing conditions. Overall, these effects do not constitute a substantial adverse effect on a scenic vista given that the Project would retain many other views of ridgelines and natural open space areas for other viewpoints from elsewhere along Santa Ana Canyon Road and from other vantage points. Also, the Project would be required to further minimize these visual effects through replacement tree planting and re-landscaping of the Project Site and adhere to all other design standards and guidelines as detailed in the Specific Plan.

Shade and Shadow

Shade and shadow relates to the blockage of direct sunlight by structures, which may or may not affect adjacent properties. Shading is an important issue because the users of certain land uses, such as residential, recreational, and pedestrian areas, have expectations for periods of direct sunlight and warmth from the sun. Factors that influence the extent of range of shading include season, time of day, weather (i.e., sunny or cloudy), structure height, structure bulk and scale, spacing between structures; and tree cover. The longest shadows are cast during the winter months, when the sun orientation is lowest, and the shortest shadows are cast during the summer months, when the sun orientation is highest. Shadows are longer in the early morning and late afternoon.

Due to its proposed height relative to existing residences, the Project's proposed multiple-family residential building has the potential to briefly cast a shadow on existing single-family residences that are immediately west of the Project Site during the first few minutes of sunrise each day (i.e., for less than ten minutes per day). As the sun rises more and more in the east this shadow would gradually lessen and then disappear as direct line-of-sight eventually occurs between the existing residences west of the Project Site and the sun. Given the installation of retaining walls west of the proposed multiple-family residential building and the existing slope on the western side of the proposed multiple-family residential building, any shade effects would be minimal when compared to existing conditions.

Retaining Walls

Retaining walls would be constructed along the northern edge of the Project Site as well as behind the proposed commercial buildings that would alter visual quality for public viewpoints from along Santa Ana Canyon Road, SR-91, the Santa Ana River Trail, Yorba Regional Park, Deer Canyon Park Preserve, and Eucalyptus Drive. The retaining walls are proposed to minimize grading and to preserve open space.

Although retaining walls are permitted with certain limitations by the AMC, the Specific Plan Area's topography requires thoughtfully engineered retaining walls that deviate from the AMC as explained in detail in Table 3.9, Retaining Wall Development Standards, of the Specific Plan. Walls for the Specific Plan Area have been designed to minimize visual impact, to the extent feasible. The Project's retaining walls have also been designed to limit ground disturbance, leaving as much area untouched as practical and feasible.

Two proposed retaining walls along the west property line near single family residences are necessary for the road alignment and to reduce development footprint within the canyon. Two walls up to 30' vertical height each (currently 58' combined vertical height) are to be designed to secure existing hillside and to have a rock façade.

The Project would include retaining walls that would deviate from the base standards set forth in the AMC. These walls are proposed due to the Project Site's varied topography and geologic conditions, and because of existing single-family homes west of the Project Site that need to be protected in place. Specifically, the Project would include some relatively tall retaining walls when compared to the walls that are allowed by AMC. The Specific Plan would allow for up to one 30-foot-tall retaining wall and up to two 60-foot-tall retaining walls to be installed along the western side of the Project Site. The Specific Plan would allow for up to three 14-foot-tall retaining walls and for up to five 10-foot-retaining walls on the east side of the Project Site. However, taller walls may be permissible if proven to the City to be geotechnically feasible during final design if such taller walls would result in greater open space acreage or if it allows for the total number of terraces to be reduced. Also, retaining walls would be required for the Project that would be visible from public viewpoints that would be taller than the requirements in the AMC allow for.

Also, within the Scenic Corridor setback portion of the Project Site, retaining walls up to 6-feet in height shall be permitted. Also, retaining walls up to 13-feet in height shall be permitted within the Scenic Corridor setback that are built in connection with the Project's required Santa Ana Canyon Road improvements.

The visual effects of these retaining walls would be minimized through implementation of **MM AES-3**, which requires that the toe of all retaining walls that are visible from Santa Ana Canyon Road be landscaped and/or that these retaining walls that are visible from Santa Ana Canyon Road be finished with a special façade treatment, such as the rock façade treatment that is shown in the Specific Plan, to soften their appearance in furtherance of the City's Scenic Corridor requirements. Further, trees would be planted amongst the various levels of these retaining walls to further soften their appearance.

Conclusion

In conclusion, the proposed Project would not be consistent with the current zoning and land use designations for the Project Site. Therefore, the Project includes a General Plan Amendment and Zone Change to allow for the development and uses that are proposed.

Also, as discussed in more detail in Section 4.10, Land Use and Planning, with implementation of **MM AES-3**, the Project would be consistent with the requirements for the Scenic Corridor Overlay Zone.

The Project would remove specimen trees within the Project Site, which is prohibited by the AMC without a permit. As required by AMC Section 18.18.040, impacted specimen trees would require the issuance of a Specimen Tree Removal Permit by the City. As part of the permit process, the City requires that replacement trees be planted on the same parcel or in the public right-of-way located in the immediate vicinity, as directed by the City. The City's Specimen Tree Removal Permit process would ensure that Project effects related to the removal of specimen trees in the Project Site would be minimized.

Finally, the Project proposes several retaining walls that would be visible from Santa Ana Canyon Road that are taller than allowed by the AMC and that would require deviations from the AMC to approve. As required by **MM AES-3**, these walls would be landscaped, or they would have a rock façade treatment to improve their appearance to viewers from Santa Ana Canyon Road.

With adherence to applicable laws and requirements, including, among others, the City's Tree Preservation Ordinance, and the required implementation of mitigation measures **MM AES-1**, **MM AES-2**, and **MM AES-3**, the Project would have a less than significant impact related to this threshold.

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

Less Than Significant With Mitigation Incorporated. there is no existing lighting within the Project Site. However, there are approximately eight existing streetlights outside of and adjacent to the Project's frontage with Santa Ana Canyon Road. Otherwise, The Project Site is located within a partially developed area of the City that is subject to limited nighttime lighting in existing conditions, including lighting from streetlights and vehicle headlights on Santa Ana Canyon Road. There is also existing lighting near the Project Site associated with building and security lights on neighboring properties.

Exterior Lighting

An exterior lighting plan for the Project is provided as Exhibit 3-21. A Lighting Study containing photometric analyses and renderings have been prepared for the multiple-family residential portion of the Project, which is nearest single-family residences (Placeworks 2024b).

The Specific Plan provides the following guidance for Project lighting, to which the Project must adhere:

Outdoor lighting should be subdued yet effective for visibility, security, ambiance, and wayfinding. Appropriate lighting should be installed in all common activity areas, building entrances, and in pathways for purposes of wayfinding, safety, and security.

Public area lighting should be warm colored and unobtrusive. Light sources should be predominantly energy efficient warm light LED. Light sources should be directed so that it does not fall outside the area to be lighted. Shields should be used to direct and shield source from view. Lighting shall adhere to all applicable standards and requirements set forth in the Anaheim Municipal Code. Exterior lighting would be required to be installed in accordance with all applicable requirements and standards, and would be located in all common activity areas, building entrances, and in pathways for purposes of wayfinding, safety, and security. Low lumen shielded landscape lighting, tree lighting, and other accent lighting is proposed.

The “Street Light Design #738/#739” for the “Anaheim Hills Area” of the City would be used for the Project, as detailed in the City of Anaheim’s Public Utilities Department’s Specification for Street Lighting Systems document (City of Anaheim 2017a). The standard design would be modified through the addition of shielding and other measures to be dark sky friendly and to limit lighting to developed areas of the Project Site only.

Light sources used by the Project would be predominantly energy efficient and would use warm light LED bulbs.

In accordance with applicable standards, all light sources would be directed and/or shielded so that exterior Project lighting does not illuminate adjacent open space areas, residences, or elsewhere off-site. The potential impacts of the Project’s night lighting to wildlife is evaluated in detail within Section 4.3, Biological Resources. Exterior lighting for the Project would be required to adhere to **MM BIO-11**, which requires that the Property Owner/Developer submit a final exterior lighting plan to the City of Anaheim for review and approval prior to issuance of a grading permit. The final exterior lighting plan would be required to 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) would be required to 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 proposed along the western, southern, and eastern edges of the Project development would 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 final exterior light plan would be required to demonstrate that the Project’s exterior lighting would not increase lighting levels more than 0.5-foot-candle³ 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 Site. Also, prior to final building and zoning inspections, the applicant would be required to relevant provisions set forth in Covenants, Conditions, and Restrictions (CC&Rs), reciprocal easements, or similar document recorded on the property to the City for approval to ensure ongoing compliance with the foregoing exterior lighting requirement; specifically, it would be required to be included as a mandatory requirement for future owners and occupants in the CC&Rs, reciprocal easements, or similar document recorded on the property, for

³ A foot-candle is a unit of illuminance or light intensity that measures how much light falls on a surface one foot away from a candle.

commercial, multiple-family, and single-family residential lots. Modifications to the relevant provisions of the CC&Rs would require City approval.

As depicted in the Lighting Study's photometric analyses and nighttime renderings, the design of the multiple-family residential building and supporting infrastructure (e.g., streetlights) would not result in any substantial off-site lighting effects for neighboring parcels (Placeworks 2024b).

During construction night lighting would be required for safety and security that may adversely affect nighttime scenic views of ridgelines and hillsides within the Project Site. As required by **MM AES-2**, the Contractor would be required to minimize the use of construction night lighting to the maximum extent feasible. Also, the Contractor would be required to 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.

With adherence to all applicable requirements and standards, along with the required implementation of **MM BIO-11** and **MM AES-2**, the Project's operational lighting effects would be minimized and considered less than significant.

Glare

Reflected glare can occur when sunlight is reflected from a building surface into the view of surrounding observers causing annoyance and/or loss of vision. Sources of daytime glare would include direct beam sunlight and reflections from windows, architectural coatings, glass, and other reflective surfaces. Nighttime illumination and associated glare are generally divided into two sources: stationary and mobile. Stationary sources would include structure lighting and decorative landscaping, lighted signs, solar panels, and streetlights. Mobile sources would primarily consist of headlights from motor vehicles.

From a building design perspective, the risk of reflected glare is greatest for: buildings that are four-stories or taller; buildings that are not oriented directly in a north/south/east/west direction; and buildings with concave and/or tilted facades. From a building materials perspective, there is a greater degree of reflected glare from buildings that incorporate glass and polished exterior siding materials. Reflected glare risks can also arise when cladding, painted walls or concrete have matte or smooth finishes.

A Reflected Solar Glare Study was prepared for the Project in 2024 to evaluate whether the Project's proposed buildings would result in a new source of substantial glare that could adversely affected day or nighttime views in the area (Placeworks 2024a) (Appendix D).

The Reflected Solar Glare Study took the foregoing Project elements into consideration as well as its overall orientation vis-à-vis off-site perspectives. It determined that there are few residential viewers west of the proposed Project and that all of these views would be looking down or level with the roof of the proposed multiple-family residential building. Therefore, glare effects to residences is not likely to result from the Project. The east and west sides and west sides of the multiple-family residential building would only have direct sun in the mornings and evenings respectively and could thus reflect glare to the east and west of the

Project Site. The movement of the sun throughout the day would mean the angle of reflection would be constantly changing and momentary. Therefore, given the temporary nature of any such glare, these effects would be minimal for off-site viewers. Also, the Reflected Solar Glare Study determined that given the location of the proposed multiple family residential building on the inside of the curve of the SR-91 freeway and Santa Ana Canyon Road, the building and any potential glare effects would be put outside of a driver's foveal vision.

Glare from lighting in the Project Site and from vehicles would be similar to glare that already occurs in the Project Site vicinity related to existing development and roadways.

In addition to the foregoing, the Project would be required to adhere to all applicable development standards and design guidelines for development of the Project Site including, without limitation, those set forth in the Specific Plan and the AMC.

Therefore, as detailed more fully in the Reflected Solar Glare Study, the Project would have a less than significant impact related to glare and that no mitigation was required.

Conclusion

Therefore, with implementation of **MM BIO-11** and **MM AES-2**, the Project would result in a less than significant impact related to this threshold.

4.1.5 CUMULATIVE IMPACTS

Projects considered in the cumulative impact analysis consist of eight projects within the City of Anaheim. These related projects are described in more detail in Table 4-1, Cumulative Projects List, which is provided in Section 4.0.

As discussed above, the Project vicinity included in this cumulative analysis includes scenic resources such as a segment of a State-designated scenic highway, local scenic corridor and natural open space areas and ridgelines. However, this area is already urbanized to a certain degree, with existing and proposed development including residential, office, and commercial uses consistent with the General Plan and similar to the Project. Cumulative development, similar to the Project, would be subject to applicable zoning, development standards and design guidelines and the applicable policies and implementing programs to help ensure no significant impacts to scenic vistas and other scenic resources in the City. The Project, combined with other cumulative development, would increase light and glare in the Project vicinity. Cumulative development could include streetlights, exterior lighting, safety lighting, lighting from vehicles, and sources of glare from the buildings and vehicles. That said, local regulations related to light and glare would be applicable to all cumulative development, which would be required to adhere to same or otherwise mitigate to reduce impacts on a project-specific basis.

Nearest the Project Site, there are 450 multiple-family residential units proposed within the Anaheim Hills Festival Specific Plan area as part of DEV2023-00043. Since the site for this project is previously developed with urban uses, DEV2023-00043 would not substantially alter any views of ridgelines, natural open space areas, or other scenic vistas or views from

Santa Ana Canyon Road or SR-91. Also, DEV2023-00043 would not substantially alter lighting nor would that Project require the removal of any specimen trees. However, DEV2023-00043 would require discretionary approvals so that project would not result in any substantial conflicts with applicable zoning and other regulations governing scenic quality.

DEV2020-00204 consists of a 180-acre cemetery on a property that would be located south of Santa Ana Canyon Road and Gypsum Canyon Road. If built, there is potential that ridgelines and natural open space areas would be removed to make space for the cemetery. However, during the City's development review process, the City will have an opportunity to review DEV2020-00204 prior to its approval for consistency with the City's zoning and other regulations governing scenic quality. If DEV2020-00204 is determined to be inconsistent with applicable aesthetic-related City policies, modifications to the Project would be required to help ensure impacts to aesthetic resources would be less than significant.

Collectively, the cumulative projects and the Project would result in increased urban development that would collectively increase the number of buildings, vehicles, and people within eastern Anaheim near the Project Site. The Project, along with DEV2020-00204, would result in fewer acres of open space land uses and fewer visually-significant ridgelines that are visible from Santa Ana Canyon Road, a City scenic corridor, and SR-91, a State Scenic Highway. However, through compliance with applicable City and other requirements, through issuance of discretionary approvals, and through implementation of reasonably foreseeable mitigation measures that would be required for visual effects, the Project and the cumulative projects would result in less than significant cumulative impacts.

Moreover, for the reasons set forth above, the Project would not make a cumulatively considerable contribution to this already less than significant impact. The Project would be required to adhere to all applicable development standards and design guidelines for development of the Project Site including, without limitation, those set forth in the Specific Plan and the AMC. The Project has been designed such that the building envelopes would be clustered and located at lower elevations, thereby protecting upper elevations with prominent ridgelines. Moreover, approximately 57% of the Project Site would remain in open space uses, thereby retaining the aesthetic and scenic qualities of this natural open space areas.

Therefore, based on foregoing, the Project's contribution to this less than significant impact would not be cumulatively consideration, and thus no mitigation is required.

4.1.6 MITIGATION PROGRAM

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 remediating the materials.

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.

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 $\frac{3}{4}$ 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.

4.1.7 SIGNIFICANCE AFTER MITIGATION

With implementation of mitigation measures **MM AES-1**, **MM AES-2**, **MM AES-3**, and **MM BIO-11**, the Project would result in a less than significant impact related to aesthetics.

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