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DRAFT
The Mill Residential Townhome Project (DEV2023-00042)
Initial Study/Mitigated Negative Declaration
City of Anaheim, Orange County, California

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ACRONYMS AND ABBREVIATIONS

°C	degrees Celsius (Centigrade)
°F	degrees Fahrenheit
µg/m^3	micrograms per cubic meter
APU	Anaheim Public Utilities
AQMP	Air Quality Management Plan
ARB	California Air Resources Board
BERD	Built Environment Resource Directory
CA MUTCD	California Manual on Uniform Traffic Control Devices
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
Cal/OSHA	California Division of Occupational Safety and Health
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standard Code
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAMPSS	Central Anaheim Master Plan of Sanitary Sewers
CBC	California Building Standards Code
CBC	California Building Standards Code
CCAA	California Clean Air Act
CCAA	Clean Air Act
CCR	California Code of Regulations
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CMP	Congestion Management Program
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CNPSEI	California Native Plant Society Electronic Inventory
CONCCP/HCP	County of Orange Natural Communities Conservation Plan/Habitat Conservation Plan
CRHR	California Register of Historical Resources
CWA	Clean Water Act
CY	cubic yards
DPM	diesel particulate matter
DPR	California Department of Parks and Recreation
DTSC	California Department of Toxic Substance Control

du/acre	dwelling unit per acre
DWR	California Department of Water Resources
EIR	Environmental Impact Report
EMFAC	Emission Factors
EOP	Emergency Operations Plan
EPA	United States Environmental Protection Agency
EV	electric vehicle
FAR	floor area ratio
FCS	FirstCarbon Solutions
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zone
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
GHG	greenhouse gas
GPA	General Plan Amendment
GSP	Groundwater Sustainability Plan
HBEA	Historic Built Environment Assessment
HFC	hydrofluorocarbon
HQTA	High Quality Transit Areas
HVAC	Heating/ventilating/air conditioning
iDigBio	Integrated Digitized Biocollections
LAFCo	Local Agency Formation Commission
LOS	Level of Service
LRA	Local Responsibility Area
LST	localized significance thresholds
MBTA	Migratory Bird Treaty Act
MLD	Most Likely Descendant
MMT	million metric tons
MND	Mitigated Negative Declaration
mph	miles per hour
MT	metric tons
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
ND	Negative Declaration
NHM	Natural History Museum of Los Angeles County
NOI	Notice of Intent

NOP	Notice of Preparation
NO_X	nitrogen oxide
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
OC San	Orange County Sanitation District
OCTA	Orange County Transit Agency
OCWD	Orange County Water District
OEHHA	Office of Environmental Health Hazard Assessment
PFC	perfluorocarbons
PPV	peak particle velocity
PRIMP	Paleontological Resources Impact Mitigation Program
PV	photovoltaics
RCNM	Roadway Construction Noise Model
RCRA	Resource Conservation and Recovery Act
REC	Recognized Environmental Condition
RO	Residential Opportunity
ROG	reactive organic gases
RPS	Renewables Portfolio Standard
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SGMA	Sustainable Groundwater management Act
SLF	Sacred Lands File
SoCAB	South Coast Air Basin
SO_X	sulfur oxide
SRA	State Responsibility Area
SRRE	Source Reduction and Recycling Element
STEAM	science, technology, engineering, the arts, and math
SVP	Society of Vertebrae Paleontology
SWIS	Solid Waste Information System
SWPPP	Storm Water Pollution Prevention Plan
TAC	toxic air contaminants
TCR	Tribal Cultural Resources
The Nat	San Diego Natural History Museum
TPA	Transit Priority Area
TTM	Tentative Tract Map
UCMP	University of California Museum of Paleontology
USGS	United States Geological Survey

UWMP	Urban Water Management Plan
VMT	Vehicle Miles Traveled
VOC	volatile organic compound
WEAP	Worker Environmental Awareness Program
WQMP	Water Quality Management Plan

SECTION 1: INTRODUCTION

1.1 - Purpose

The purpose of this Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) is to identify any potential environmental impacts that would result from implementation of proposed The Mill Residential Townhome Project (proposed project) in the City of Anaheim, California. Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15367, the City of Anaheim has discretionary authority over the proposed project and is the Lead Agency in the preparation of this Draft IS/MND and any additional environmental documentation required for the proposed project.

The remainder of this section provides a brief description of the project location and the primary project characteristics. Section 2 includes an environmental checklist that provides an overview of the potential impacts that may result from project implementation, elaborates on the information contained in the environmental checklist, and provides justification for each checklist response. Feasible mitigations are analyzed to reduce all impacts to below a level of significance. Section 3 contains the List of Preparers.

1.2 - Project Location

The project site is located at 275 and 301 East Santa Ana Street in the City of Anaheim (City), in Orange County, California (Exhibit 1). The project site is bound by East Santa Ana Street to the south, South Claudine Street to the west, South Olive Street to the east, and an existing alley to the north. South Philadelphia Street divides the middle of the project area, creating two separate blocks. The approximately 2.05-acre project site consists of three parcels, Assessor's Parcel Numbers (APNs) 037-024-11, and 037-111-29, and -30. The project site is located approximately 0.98 mile east of Interstate 5 (I-5), the Santa Ana Freeway. As shown in Exhibit 2 the project site is in the western/central portion of the City. Regional access to the project site is from I-5 via South Harbor Boulevard and Lincoln Avenue exits.

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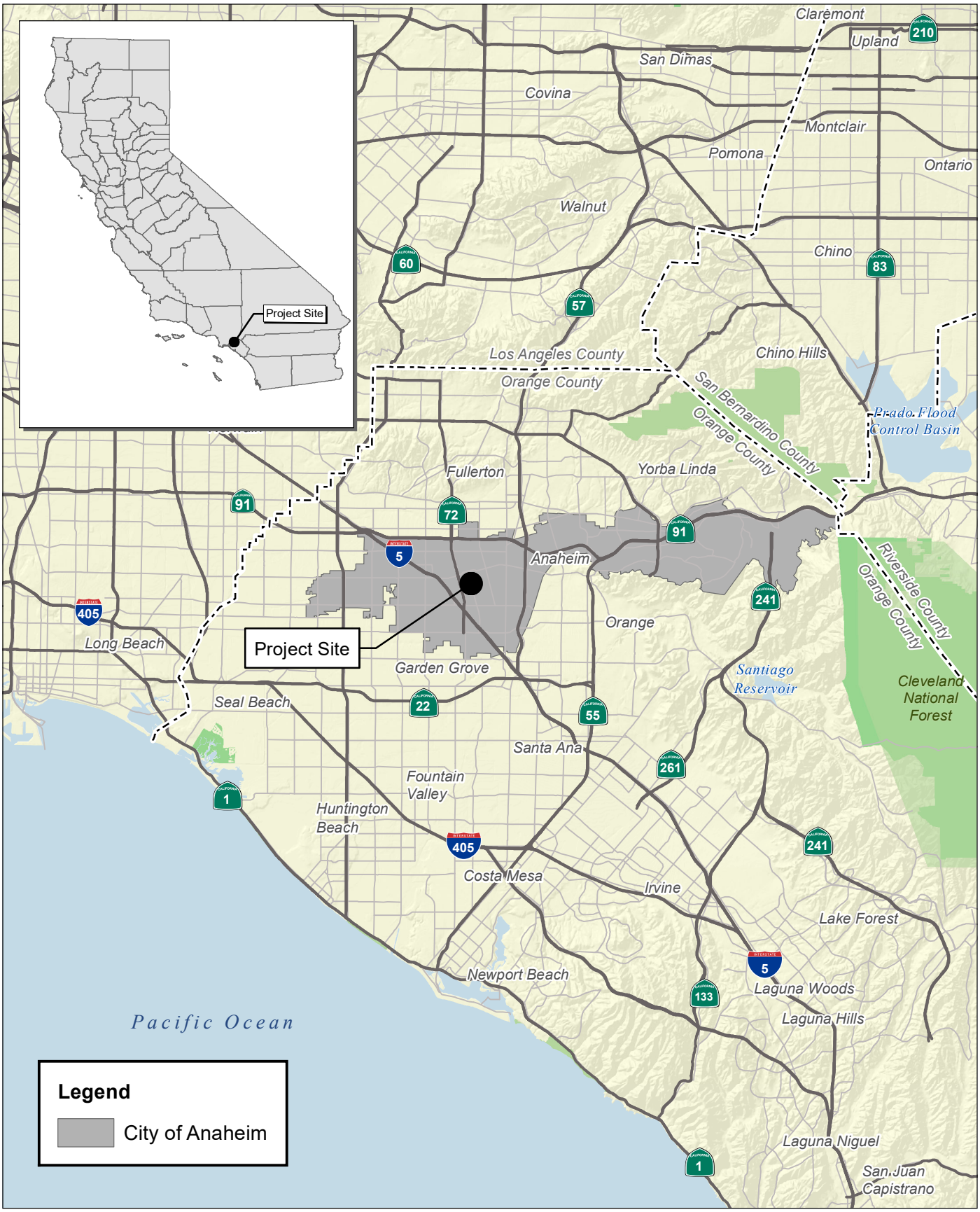

Source: Census 2000 Data, The California Spatial Information Library (CaSIL).

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Exhibit 1
Regional Location Map

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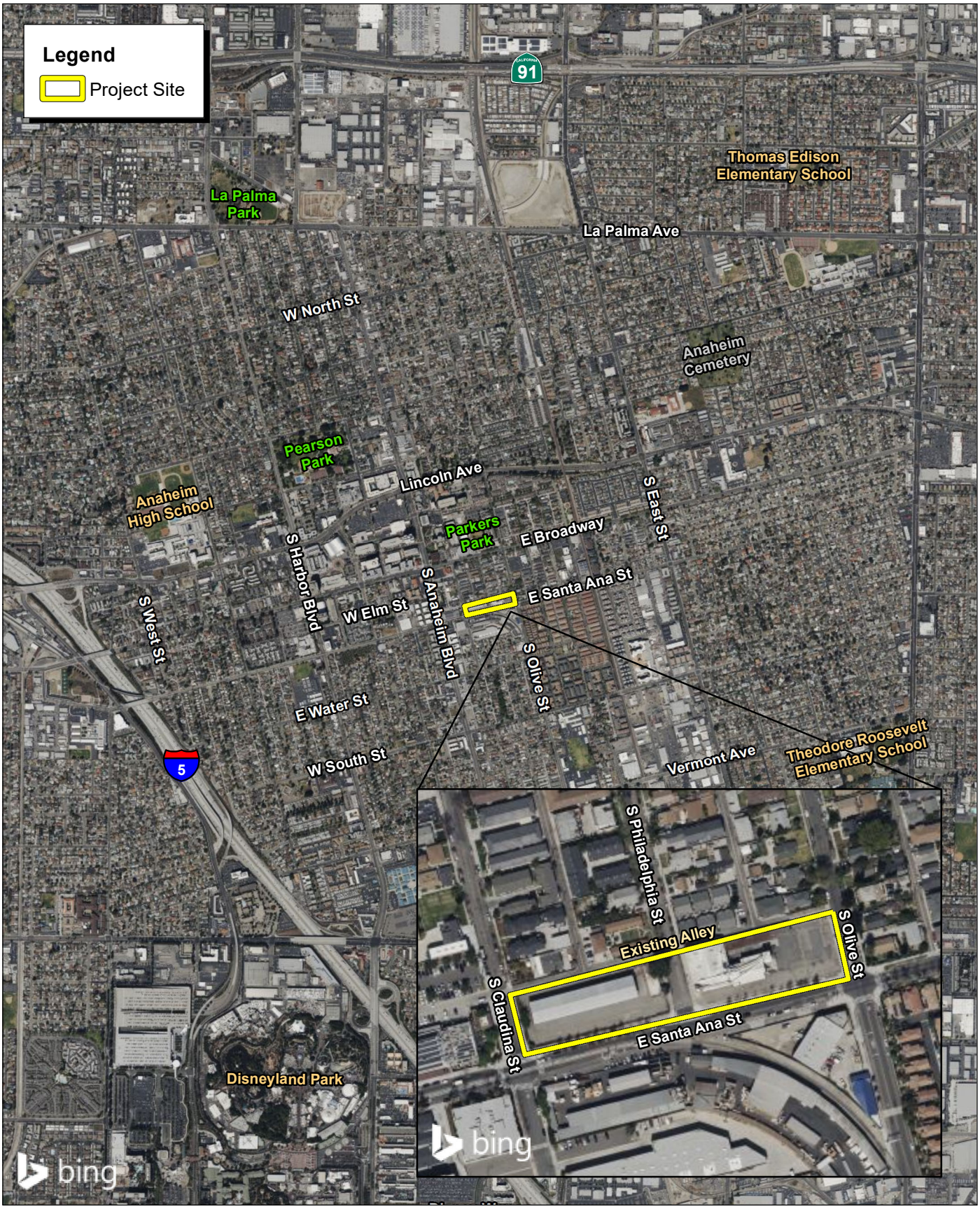

Source: Bing Aerial Imagery.

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2,000 1,000 0 2,000 Feet

Exhibit 2
Local Vicinity Map

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1.3 - Environmental Setting

Land Uses and Zoning

The project site was formerly a lumber yard and mill and is currently used as valet parking and storage for trolleys associated with adjacent retail use. The project site is entirely paved or covered by structures that are remnants of previous industrial use and is extremely flat, with minimal elevation change. The proposed project would include demolition of the existing buildings and improvements.

The City of Anaheim General Plan (General Plan) currently designates the project site for Low Medium Density Residential land use (up to 18 dwelling units per acre [du/ac]) (Exhibit 3).[1] The proposed project would require a General Plan Amendment (GPA) to change the land use designation from Low Medium Density Residential to Medium Density Residential (up to 36 du/ac). The Medium Density Residential land use designation is intended to provide a quality multiple-family living environment with design amenities, such as recreational-leisure areas, business services, swimming pools, etc.[2]

The project site is currently zoned Industrial (I) (Exhibit 4) with the Residential Opportunity (RO) Overlay Zone and the South Anaheim Boulevard Corridor Overlay Zone. The purpose of the RO Overlay Zone is to provide "by-right" housing development opportunities consistent with a property's residential General Plan land use designation. This Overlay Zone is intended to be applied to properties that are currently zoned and/or developed with nonresidential uses but designated for multiple-family residential uses by the General Plan. The Overlay Zone is intended to serve as an implementation tool of the City's Housing Element of the General Plan by facilitating residential development on identified "housing opportunity sites."[3] In conjunction with the proposed GPA to Medium Density Residential, pursuant to the RO Overlay the project would be subject to the RM-4 zoning development standards.

Surrounding Land Uses

North: Single-family and multi-family residential uses.

South: East Santa Ana Street, commercial and industrial uses.

East: South Olive Street, single-family and multi-family residential uses.

West: South Claudina Street, commercial and retail uses, and single-family and multi-family residential uses.

[1] City of Anaheim. 2004. City of Anaheim General Plan, Land Use Element. Figure LU-4, Land Use Plan. Revised August 9, 2022. Website: https://www.anaheim.net/DocumentCenter/View/9522/E-Land-Use-Element?bidId=. Accessed June 10, 2024.
[2] City of Anaheim. 2004. City of Anaheim General Plan, Land Use Element. Website: https://www.anaheim.net/DocumentCenter/View/9522. Accessed June 10, 2024.
[3] City of Anaheim. 2011. Anaheim Municipal Code, Section 18.34.010, Purpose. Website: https://codelibrary.amlegal.com/codes/anaheim/latest/anaheim_ca/0-0-0-67675#JD_18.34.010. Accessed June 10, 2024.

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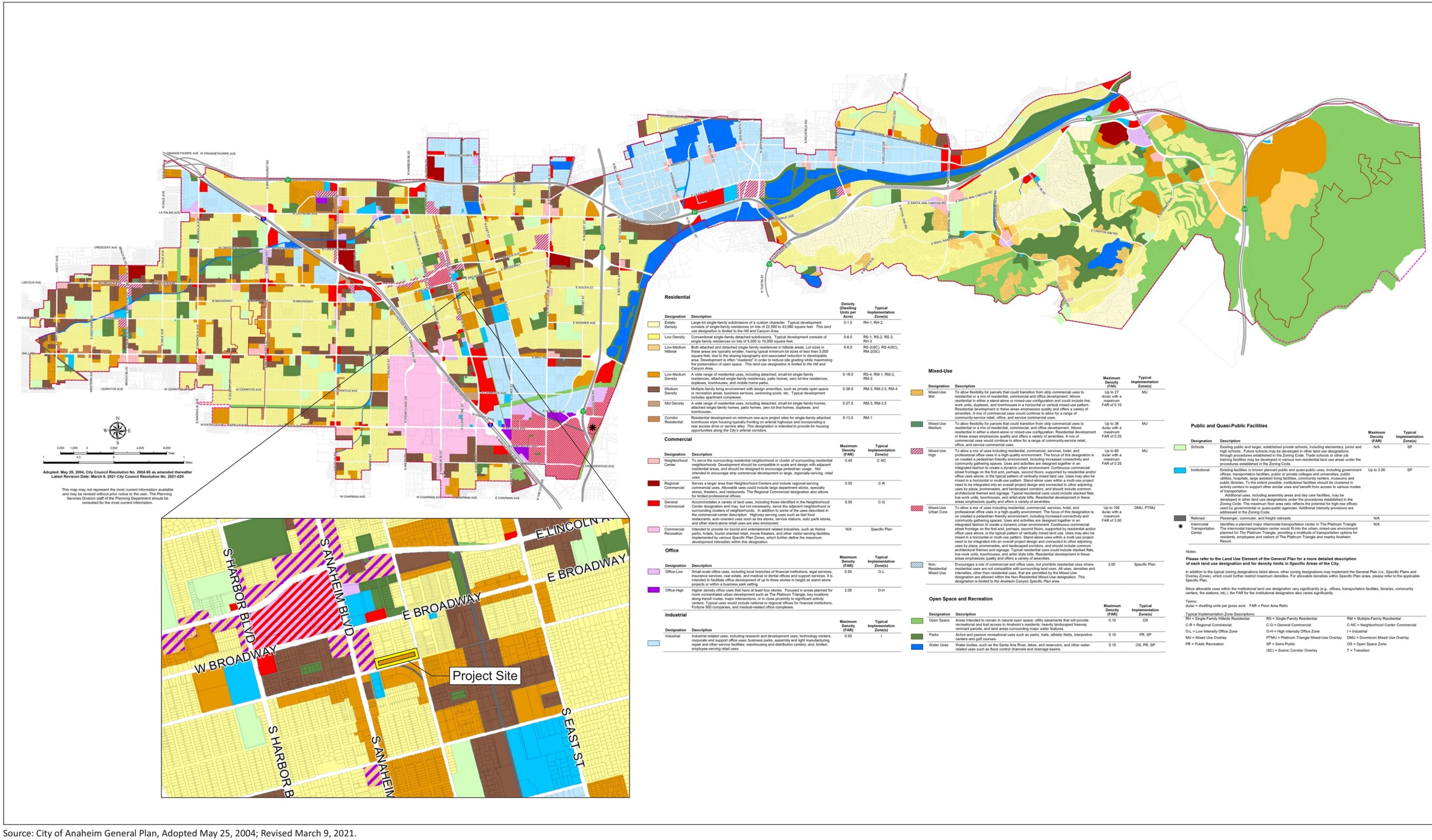

Residential

Designation	Description	Density (Dwelling Units per Acre)	Typical Implementation Zone(s)
Estate Density	Large-lot single-family subdivisions of a custom character. Typical development consists of single-family residences on lots of 22,000 to 43,560 square feet. *This land use designation is limited to the Hill and Canyon Area.*	0-1.5	RH-1, RH-2
Low Density	Conventional single-family detached subdivisions. Typical development consists of single-family residences on lots of 5,000 to 10,000 square-feet.	0-6.5	RS-1, RS-2, RS-3, RH-3
Low-Medium Hillside	Both attached and detached single-family residences in hillside areas. Lot sizes in these areas are typically smaller, having typical minimum lot sizes of less than 5,000 square-feet, due to the sloping topography and associated reduction in developable area. Development is often "clustered" in order to reduce site grading while maximizing the preservation of open space. *This land use designation is limited to the Hill and Canyon Area.*	0-6.0	RS-3(SC), RS-4(SC), RM-2(SC)
Low-Medium Density	A wide range of residential uses, including detached, small-lot single-family residences, attached single-family residences, patio homes, zero lot line residences, duplexes, townhouses, and mobile home parks.	0-18.0	RS-4, RM-1, RM-2, RM-3
Medium Density	Multiple-family living environment with design amenities, such as private open space or recreation areas, business services, swimming pools, etc. Typical development includes apartment complexes.	0-36.0	RM-3, RM-3.5, RM-4
Mid Density	A wide range of residential uses, including detached, small-lot single-family homes, attached single-family homes, patio homes, zero lot line homes, duplexes, and townhouses.	0-27.0	RM-3, RM-3.5
Corridor Residential	Residential development on minimum one-acre project sites for single-family attached townhouse style housing typically fronting on arterial highways and incorporating a rear access drive or service alley. *This designation is intended to provide for housing opportunities along the City's arterial corridors.*	0-13.0	RM-1

Commercial

Designation	Description	Maximum Density (FAR)	Typical Implementation Zone(s)
Neighborhood Center	To serve the surrounding residential neighborhood or cluster of surrounding residential neighborhoods. Development should be compatible in scale and design with adjacent residential areas, and should be designed to encourage pedestrian usage. *Not intended to encourage strip commercial development or large, regionally-serving, retail uses.*	0.45	C-NC
Regional Commercial	Serves a larger area than Neighborhood Centers and include regional-serving commercial uses. Allowable uses could include large department stores, specialty stores, theaters, and restaurants. The Regional Commercial designation also allows for limited professional offices.	0.50	C-R
General Commercial	Accommodates a variety of land uses, including those identified in the Neighborhood Center designation and may, but not necessarily, serve the adjacent neighborhood or surrounding clusters of neighborhoods. In addition to some of the uses described in the commercial center description. Highway-serving uses such as fast food restaurants, auto oriented uses such as tire stores, service stations, auto parts stores, and other stand-alone retail uses are also envisioned.	0.50	C-G
Commercial Recreation	Intended to provide for tourist and entertainment related industries, such as theme parks, hotels, tourist oriented retail, movie theaters, and other visitor-serving facilities. *Implemented by various Specific Plan Zones, which further define the maximum development intensities within this designation.*	N/A	Specific Plan

Office

Designation	Description	Maximum Density (FAR)	Typical Implementation Zone(s)
Office-Low	Small-scale office uses, including local branches of financial institutions, legal services, insurance services, real estate, and medical or dental offices and support services. It is intended to facilitate office development of up to three stories in height as stand-alone projects or within a business park setting.	0.50	O-L
Office-High	Higher density office uses that have at least four stories. Focused in areas planned for more concentrated urban development such as The Platinum Triangle, key locations along transit routes, major intersections, or in close proximity to significant activity centers. Typical uses would include national or regional offices for financial institutions, Fortune 500 companies, and medical-related office complexes.	2.00	O-H

Industrial

Designation	Description	Maximum Density (FAR)	Typical Implementation Zone(s)
Industrial	Industrial-related uses, including research and development uses, technology centers, corporate and support office uses; business parks, assembly and light manufacturing, repair and other service facilities; warehousing and distribution centers; and, limited, employee-serving retail uses.	0.50	I

Mixed-Use

Designation	Description	Maximum Density (FAR)	Typical Implementation Zone(s)
Mixed-Use Mid	To allow flexibility for parcels that could transition from strip commercial uses to residential or a mix of residential, commercial and office development. Allows residential in either a stand-alone or mixed-use configuration and could include live-work units, duplexes, and townhouses in a horizontal or vertical mixed-use pattern. Residential development in these areas emphasizes quality and offers a variety of amenities. A mix of commercial uses would continue to allow for a range of community-service retail, office, and service commercial uses.	Up to 27 du/ac with a maximum FAR of 0.10	MU
Mixed-Use Medium	To allow flexibility for parcels that could transition from strip commercial uses to residential or a mix of residential, commercial, and office development. Allows residential in either a stand-alone or mixed-use configuration. Residential development in these areas emphasizes quality and offers a variety of amenities. A mix of commercial uses would continue to allow for a range of community-service retail, office, and service commercial uses.	Up to 36 du/ac with a maximum FAR of 0.35	MU
Mixed-Use High	To allow a mix of uses including residential, commercial, services, hotel, and professional office uses in a high-quality environment. The focus of this designation is on created a pedestrian-friendly environment, including increased connectivity and community gathering spaces. Uses and activities are designed together in an integrated fashion to create a dynamic urban environment. Continuous commercial street frontage on the first and, perhaps, second floors, supported by residential and/or office uses above, is the typical pattern of vertically mixed land use. Uses may also be mixed in a horizontal or multi-use pattern. Stand-alone uses within a multi-use project need to be integrated into an overall project design and connected to other adjoining uses by plaza, promenades, and landscaped corridors, and should include common architectural themes and signage. Typical residential uses could include stacked flats, live-work units, townhouses, and artist-style lofts. Residential development in these areas emphasizes quality and offers a variety of amenities.	Up to 60 du/ac with a maximum FAR of 0.35	MU
Mixed-Use Urban Core	To allow a mix of uses including residential, commercial, services, hotel, and professional office uses in a high-quality environment. The focus of this designation is on created a pedestrian-friendly environment, including increased connectivity and community gathering spaces. Uses and activities are designed together in an integrated fashion to create a dynamic urban environment. Continuous commercial street frontage on the first and, perhaps, second floors, supported by residential and/or office uses above, is the typical pattern of vertically mixed land use. Uses may also be mixed in a horizontal or multi-use pattern. Stand-alone uses within a multi-use project need to be integrated into an overall project design and connected to other adjoining uses by plaza, promenades, and landscaped corridors, and should include common architectural themes and signage. Typical residential uses could include stacked flats, live-work units, townhouses, and artist-style lofts. Residential development in these areas emphasizes quality and offers a variety of amenities.	Up to 100 du/ac with a maximum FAR of 3.00	DMU, PTMU
Non-Residential Mixed-Use	Encourages a mix of commercial and office uses, but prohibits residential uses where residential uses are not compatible with surrounding land uses. All uses, densities and intensities, other than residential uses, that are permitted by the Mixed-Use designation are allowed within the Non-Residential Mixed-Use designation. *This designation is limited to the Anaheim Canyon Specific Plan area.*	3.00	Specific Plan

Open Space and Recreation

Designation	Description	Maximum Density (FAR)	Typical Implementation Zone(s)
Open Space	Areas intended to remain in natural open space; utility easements that will provide recreational and trail access to Anaheim's residents; heavily landscaped freeway remnant parcels, and land areas surrounding major water features.	0.10	OS
Parks	Active and passive recreational uses such as parks, trails, athletic fields, interpretive centers and golf courses.	0.10	PR, SP
Water Uses	Water bodies, such as the Santa Ana River, lakes, and reservoirs, and other water-related uses such as flood control channels and drainage basins.	0.10	OS, PR, SP

Public and Quasi-Public Facilities

Designation	Description	Maximum Density (FAR)	Typical Implementation Zone(s)
Schools	Existing public and larger, established private schools, including elementary, junior and high schools. Future schools may be developed in other land use designations through procedures established in the Zoning Code. Trade schools or other job training facilities may be developed in various non-residential land use areas under the procedures established in the Zoning Code.	N/A	SP
Institutional	Existing facilities or known planned public and quasi-public uses, including government offices, transportation facilities, public or private colleges and universities, public utilities, hospitals, large assisted living facilities, community centers, museums and public libraries. To the extent possible, institutional facilities should be clustered in activity centers to support other similar uses and benefit from access to various modes of transportation. Additional uses, including assembly areas and day care facilities, may be developed in other land use designations under the procedures established in the Zoning Code. The maximum floor area ratio reflects the potential for high-rise offices used by governmental or quasi-public agencies. Additional intensity provisions are addressed in the Zoning Code.	Up to 3.00	SP
Railroad	Passenger, commuter, and freight railroads		N/A
Intermodal Transportation Center	Identifies a planned major intermodal transportation center in The Platinum Triangle. The intermodal transportation center would fit into the urban, mixed-use environment planned for The Platinum Triangle, providing a multitude of transportation options for residents, employees and visitors of The Platinum Triangle and nearby Anaheim Resort.	N/A	N/A

Notes:

Please refer to the Land Use Element of the General Plan for a more detailed description of each land use designation and for density limits in Specific Areas of the City.

In addition to the typical zoning designations listed above, other zoning designations may implement the General Plan (i.e., Specific Plans and Overlay Zones), which could further restrict maximum densities. For allowable densities within Specific Plan areas, please refer to the applicable Specific Plan.

Since allowable uses within the Institutional land use designation vary significantly (e.g., offices, transportation facilities, libraries, community centers, fire stations, etc.), the FAR for the Institutional designation also varies significantly.

Terms:
du/ac = dwelling units per gross acre FAR = Floor Area Ratio

Typical Implementation Zone Descriptions:

RH = Single-Family Hillside Residential	RS = Single-Family Residential	RM = Multiple-Family Residential
C-R = Regional Commercial	C-G = General Commercial	C-NC = Neighborhood Center Commercial
O-L = Low Intensity Office Zone	O-H = High Intensity Office Zone	I = Industrial
MU = Mixed Use Overlay	PTMU = Platinum Triangle Mixed-Use Overlay	DMU = Downtown Mixed Use Overlay
PR = Public Recreation	SP = Semi-Public (SC) = Scenic Corridor Overlay	OS = Open Space Zone T = Transition

Source: City of Anaheim General Plan, Adopted May 25, 2004; Revised March 9, 2021.

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Exhibit 3
General Plan Land Use Map

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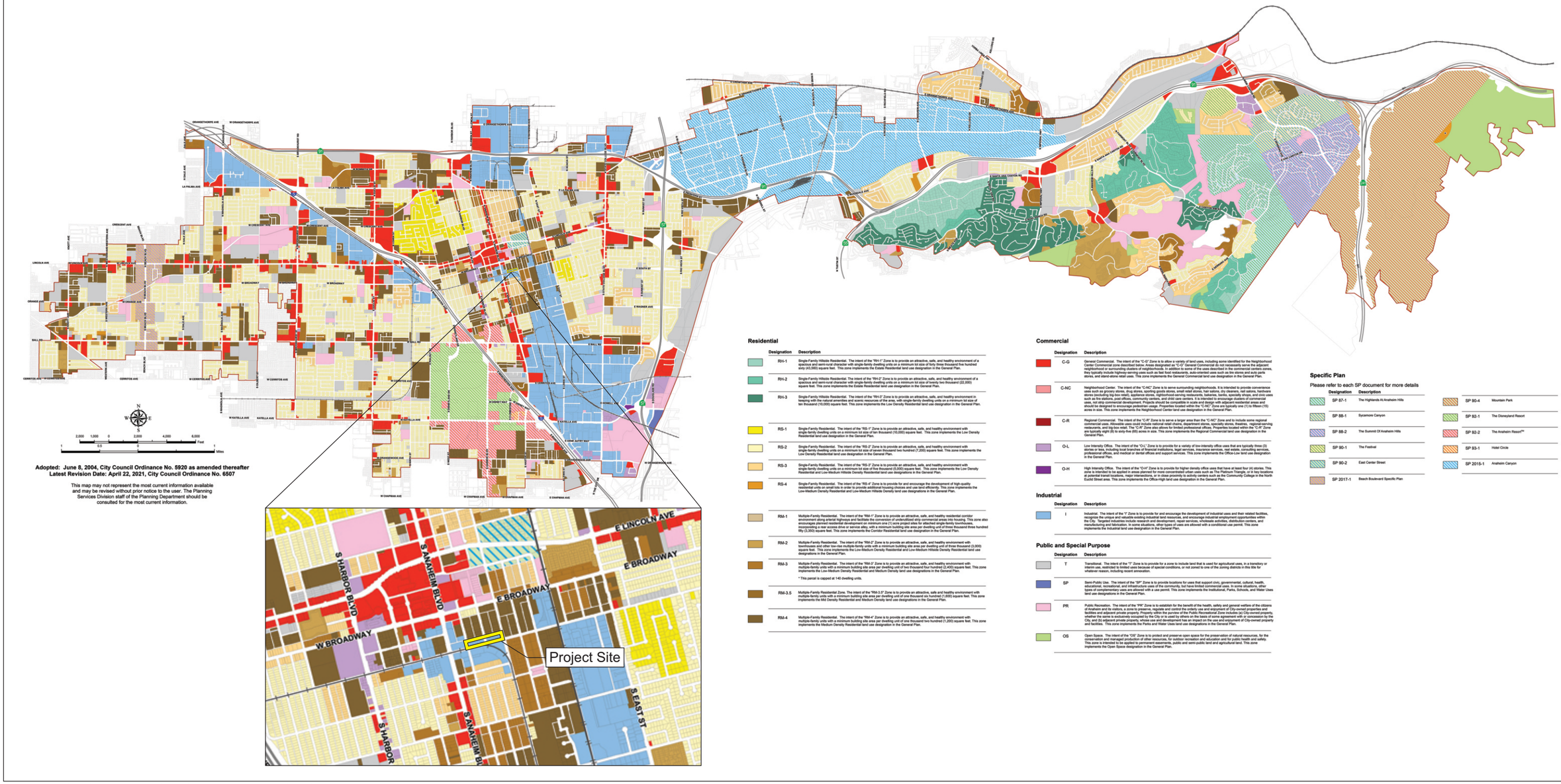

Source: City of Anaheim Zoning, Adopted June 8, 2004; Revised April 22, 2021.

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1.4 - Project Description

The applicant, MLC Holdings, LLC proposes to develop a new residential infill community consisting of 56 for-sale 3-story condominium townhomes ranging in size from approximately 1,200 to 1,800 square feet with 24 two-bedroom and 32 three-bedroom units (Exhibit 5).

The proposed project would provide private roadways and parking, pedestrian walkways, common space and amenity areas throughout the project site, landscaping, and a recreational amenity area within the project site. The proposed project would provide trash enclosures on each block on the north side of the project site. Project density would be 27.3 du/ac, which would not exceed the maximum density of 36 du/ac as defined in the Medium Density Residential (R-M) land use designation.

An Affordable Housing component is proposed with this development. A total of 10 percent (or six dwelling units) would be sold to moderate-income buyers. The applicant will enter into a density bonus housing agreement with the City to ensure compliance with the Density Bonus Ordinance.

Parking and Circulation

Vehicles would access the project site via four driveways along the alleyway immediately north of the project site. An internal private roadway system would provide two-way access to the residences and parking garages. Pedestrians would circulate within the proposed project via internal pedestrian walkways and sidewalks located throughout the site.

Ten percent of the total units proposed (i.e., six units) would be Affordable Housing units and therefore the proposed project has been designed to meet the Reduced Parking Ratios set forth in Anaheim Municipal Code 18.52.100. The proposed project would have 132 on-site parking spaces, consisting of 2-car garages for 56 units (112 spaces total) and 20 surface parking spaces including two ADA-accessible surface parking spaces. The proposed parking spaces would meet the reduced parking ratio code requirement of 84 parking spaces.

Recreational-Leisure and Landscaping

The proposed project incorporates recreational-leisure amenities including open space passive park areas, private patios, common amenity areas, and various landscaping (Exhibit 6). The required recreational-leisure area for 56 units is 11,200 square feet.[4] The proposed project would provide 11,392 square feet in total recreational-leisure area, which consists of 9,552 square feet of common recreational-leisure area and 1,840 square feet of private recreational-leisure area.

[4] 200 square feet required per unit.

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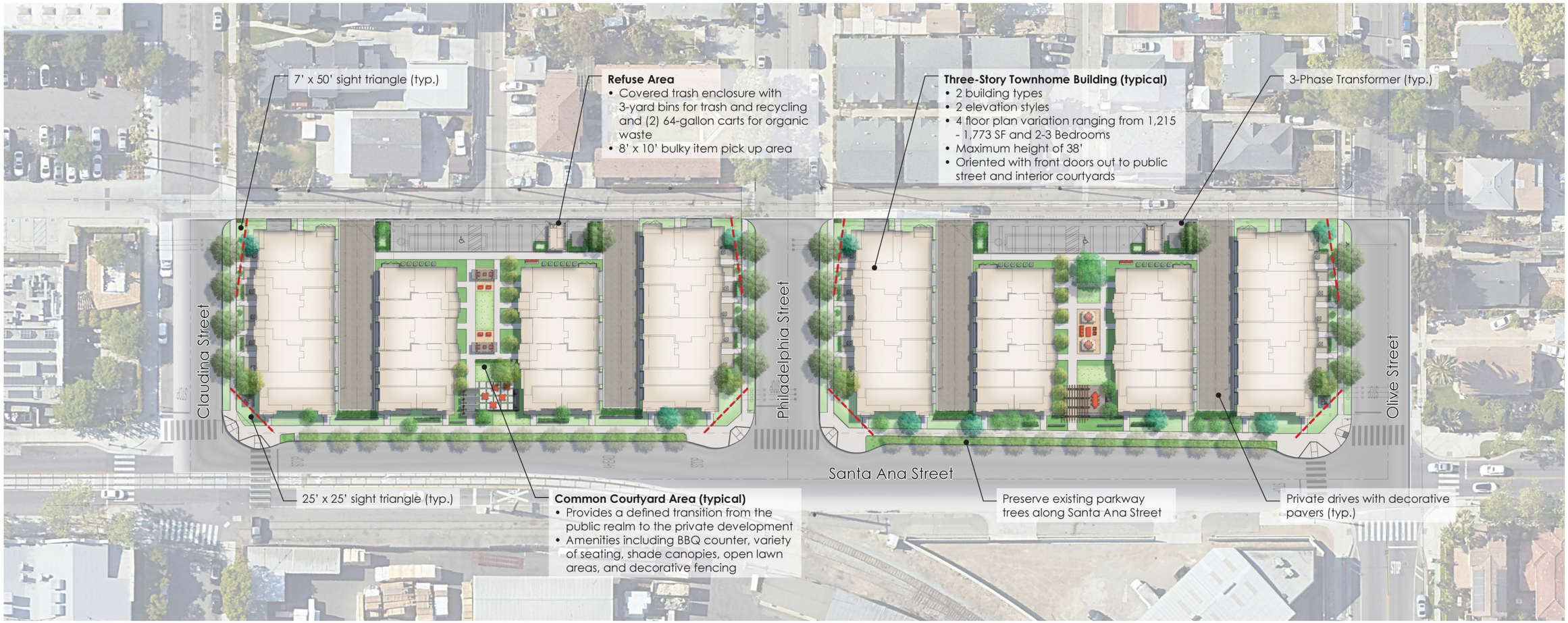

Source: Meritage Homes. 07/20/2024.

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Exhibit 5
Site Plan

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0 15' 30' 60'
Scale: 1" = 30'-0"

Source: Meritage Homes. 11/06/2023

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Exhibit 6
Landscape Plan

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Infrastructure and Utilities

Water service is provided by Anaheim Public Utilities Water Service. The proposed project would connect to existing domestic water lines within East Santa Ana Street through four 6-inch service connections to the site through the drive aisles. An existing 6-inch fire line is located in South Olive Street. There are two 1-inch service lines on South Philadelphia Street and South Claudina Street that would be cut and capped. The proposed project would connect to existing water and sanitary sewer lines and would include the installation of stormwater management systems on-site.

Stormwater would drain to the new private motor courts where it would be collected into perforated pipes that will use infiltration to treat stormwater. The proposed project would utilize the existing asphalt/concrete as part of the base on-site and would reduce impervious surfaces from approximately 89,283 square feet to 68,745 square feet.

The project is proposed to be all-electric (no gas) and would be served by two new three-phase transformers. An existing vault on the eastern portion of the project site would be removed before commencing any site development. Electricity would connect at the existing underground vault on East Santa Ana Street.
Telecommunication would connect to existing lines running in the existing alley on the proposed project's north property line.

Existing hydrants are located adjacent to the project site on South Claudina Street and South Philadelphia Street as well as diagonally across East Santa Ana Street on South Olive Street. The proposed project would provide two trash enclosures on the north side of the project site along the existing alley.

Construction

The applicant anticipates that construction of the proposed project would begin in winter 2025 with community opening sales anticipated to start in spring 2026. Construction is anticipated to be completed in winter 2027. The total duration of construction would be 24 months.

Construction activities would include demolition of the existing paved surfaces and structures, site preparation, grading, building construction, architectural coatings, and paving. Construction of the proposed project would require a small amount of import (maximum of 5,000 cubic yards [CY]) to obtain the necessary slopes for proper drainage of the site.

1.5 - Required Discretionary Approvals

The City has discretionary authority over the proposed project and is the CEQA Lead Agency for the preparation of this Draft IS/MND. In order to implement the proposed project, the City would need to approve the following entitlements:

- **General Plan Amendment** to change the land use designation from Low Medium Density Residential to Medium Density Residential (up to 36 du/ac).
- **Tentative Tract Map (TTM)** to create a one-lot condominium map for construction of 56 townhomes.

1.6 - Intended Uses of this Document

This Draft IS/MND has been prepared to document the potential significant adverse environmental impacts associated with the proposed project and identify feasible mitigation that would reduce impacts to below a level of significance. This document will also serve as a basis for soliciting comments and input from members of the public and public agencies regarding the proposed project. The Draft IS/MND will be circulated for a minimum of 20 days, during which comments concerning the analysis contained in the Draft IS/MND should be sent to:

Thomas Gorham, Contract Planner
City of Anaheim
200 South Anaheim Boulevard
Anaheim, CA 92805
Phone: 714.765.4947
Email: tgorham@anaheim.net

SECTION 2: ENVIRONMENTAL CHECKLIST AND ENVIRONMENTAL EVALUATION

Environmental Factors Potentially Affected					
The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.					
☐	Aesthetics	☐	Agriculture and Forestry Resources	☐	Air Quality
☐	Biological Resources	☒	Cultural Resources	☐	Energy
☒	Geology/Soils	☐	Greenhouse Gas Emissions	☐	Hazards/Hazardous Materials
☐	Hydrology/Water Quality	☐	Land Use/Planning	☐	Mineral Resources
☐	Noise	☐	Population/Housing	☐	Public Services
☐	Recreation	☐	Transportation	☒	Tribal Cultural Resources
☐	Utilities/Services Systems	☐	Wildfire	☐	Mandatory Findings of Significance

Environmental Determination

On the basis of this initial evaluation:

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

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

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

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

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

Date: August 6, 2024 Signed: _____

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.1 Aesthetics *Except as provided in Public Resources Code Section 21099, would the project:*				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State Scenic Highway?	☐	☐	☐	☒
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 experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Environmental Evaluation

Setting

The General Plan Green Element specifies that natural slopes located in the City's Hill and Canyon Area are considered the primary aesthetic resource in the City.[5] Additional scenic amenities such as golf courses and the Santa Ana River also provide visual relief from the built environment and are important visual amenities and landmarks.

Would the project:

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

No impact. The City does not designate any specific scenic vistas; however, it identifies the Hill and Canyon Area as a primary aesthetic resource in the City. The project site is in the western/central portion of the City, 7.5 miles west of the City's Hill and Canyon Area. Furthermore, the nearest golf course is Riverview Golf Course, located approximately 4.6 miles south of the project site. Because of the distance and intervening development and topography, the project site cannot be seen from the Hill and Canyon Area or from the Riverview Golf Course. General Plan Green Element Goal 2.1 aims to preserve views of ridgelines, natural open space, and other scenic vistas wherever possible. The project site is relatively flat and is developed with industrial uses. Surrounding uses include other commercial, industrial, and residential uses. Because of intervening development, there are no

[5] City of Anaheim. May 2004. City of Anaheim General Plan. Green Element. Website: https://www.anaheim.net/DocumentCenter/View/9521/F-Green-Element?bidId=. Accessed January 2, 2024.

scenic views of the natural slopes or the golf course from the project site or the surrounding area. Therefore, the proposed project would not affect public views of these scenic vistas. No impact would occur.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State Scenic Highway?

No impact. According to the General Plan Figure C-3, Scenic Highways, State Route (SR) 55 and SR-91 are designated Scenic Highways.[6] SR-91 between Weir Canyon Road and the eastern city limit is an officially designated State Scenic Highway.[7] Santa Ana Canyon Road and Weir Canyon Road are designated as scenic expressways by the City.[8] However, the project site is not located along any designated or eligible scenic highway or expressways.

The nearest designated State Scenic Highway is a section of SR-91 located 4.67 miles northeast of the project site. The project site is developed with industrial uses, and there are no scenic resources such as trees of significance, rock outcroppings, or historic buildings on-site. Moreover, because of the project site's distance from this section of SR-91, intervening development, and the site's relatively flat topography, the project site is not visible from SR-91. Additionally, unique visual resources or historic structures do not characterize the project site and surrounding area; therefore, no impact would occur to scenic or historic resources.

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 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?

No impact. The project site is located in an urbanized area. As such, this discussion focuses on zoning and other regulations governing scenic quality. The General Plan and Zoning Ordinance defines the permitted land uses and the corresponding development standards within the City. The project site currently has a General Plan Land Use Designation of Low Medium Density Residential allowing up to 18 du/gross acres. The proposed project would require a GPA to amend the land use designation from Low Medium Density Residential to Medium Density Residential. The proposed project would be consistent with the Medium Density Residential land designation's maximum density of 36 du/gross acres.

The project site is zoned Industrial (I) with the RO Overlay Zone and the South Anaheim Boulevard Corridor Overlay Zone. The purpose of the RO Overlay Zone is to provide "by-right" housing development opportunities consistent with a property's residential General Plan land use designation. This Overlay Zone is intended to be applied to properties that are currently zoned and/or developed with nonresidential uses but designated for multiple-family residential uses by the General Plan. The Overlay Zone is intended to serve as an implementation tool of the City's Housing

[6] City of Anaheim. May 2004. General Plan Circulation Element Figure C-3, Scenic Highways.
[7] California Department of Transportation (Caltrans). 2024. List of eligible and officially designated State Scenic Highways. Website: https://dot.ca.gov/-/media/dot-media/programs/design/documents/desig-and-eligible-aug2019_a11y.xlsx. Accessed January 9, 2024.
[8] City of Anaheim. May 2004. General Plan Circulation Element Figure C-3, Scenic Highways.

Element of the General Plan by facilitating residential development on identified "housing opportunity sites." In conjunction with the proposed GPA to Medium Density Residential, pursuant to the RO Overlay the project would be subject to the RM-4 zoning development standards.

The proposed project would comply with all Anaheim Municipal Code requirements related to scenic quality as part of the development review process, to ensure the project design is consistent with adopted design guidelines. The proposed project would not conflict with applicable zoning and other regulations pertaining to scenic quality, and no impacts would occur.

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

Less than significant impact. The project site is located in an urbanized area with existing light sources, which include streetlights, lighting on the interiors and exteriors of existing and surrounding buildings, as well as vehicle headlights and traffic signals. No nighttime construction is proposed, and construction activities would be subject to Anaheim Municipal Code Section 6.70.010, which restricts construction activities to between the hours of 7:00 a.m. and 7:00 p.m. Therefore, the proposed project would not require construction lighting, except security and safety lighting.

The proposed project would generate lighting from two primary sources: lighting from the building interiors that would pass through windows, and lighting from exterior sources (e.g., street lighting, parking area lighting, building illumination, security lighting, and landscape lighting). This proposed lighting is typical of residential developments. The proposed development would replace current existing sources of light and glare with new high quality development and lighting such as tree uplights, bollard lights, pedestrian pathway lights, and wall lights.

The City's Planning and Building Department would review any proposed lighting to ensure conformance with the California Building Standards Code (CBC), Title 24, as well as the California Green Building Standard Code (CALGreen) (California Code of Regulations [CCR] Title 24, Part 11), such that only the minimum amount of lighting is used, and no light spillage occurs. Although the proposed project would replace existing structures with new buildings that would introduce new light sources, the surrounding area is urban and already illuminated, and the proposed lighting conditions would be similar to those currently used surrounding the project site and would also incorporate the Anaheim Municipal Code, CBC, and CALGreen. Therefore, the proposed project would not cause adverse effects; therefore, a less than significant impact would occur and no mitigation is required.

Sunlight or artificial light reflecting from finished surfaces such as window glass or other reflective materials can cause reflected light (glare). Buildings constructed of highly reflective materials from which the sun reflects at a low angle commonly cause adverse glare. The proposed project does not propose use of materials known to cause glare, such as mirrored/reflective glass. Therefore, impacts would be less than significant**.**

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.2 Agriculture and Forestry Resources *In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:*				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Environmental Evaluation

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection (CAL FIRE) regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and

forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board (ARB).

Setting

The project site is zoned Industrial (I) with the RO Overlay Zone and the South Anaheim Boulevard Corridor Overlay Zone. The purpose of the RO Overlay Zone is to provide "by-right" housing development opportunities consistent with a property's residential General Plan land use designation. This Overlay Zone is intended to be applied to properties that are currently zoned and/or developed with nonresidential uses but designated for multiple-family residential uses by the General Plan.

The project site and vicinity are located in a developed urbanized area. The California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) designates the project site as Urban and Built-Up Land, which is defined as land developed at a density of at least one dwelling unit (du) per 1.5 acres, or approximately six structures to a 10.1-acre parcel.[9] The project site does not contain any Farmland or forest land.

Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?

No impact. There is no Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance on the project site or in its vicinity. In addition, the proposed project would not convert any farmland to nonagricultural use. Therefore, no impact would occur.

b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?

No impact. The project site is not under a Williamson Act Contract and is not zoned for agricultural uses. As previously discussed, the project site is currently zoned Industrial. Therefore, no impact would occur.

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

No impact. The City of Anaheim does not contain any land that is zoned for forest land or timberland. The project site is within the I Zone and is currently occupied with industrial uses; therefore, there would be no impact to land zoned for forest or timberland**.**

[9] California Department of Conservation. 2016. California Important Farmland Finder Website: https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed December 13, 2023.

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

No impact. As discussed above, the project site does not contain forest land, timberland, or timberland zoned for production. The proposed project would not result in the loss of forest land or conversion of forest land to non-forest uses. Therefore, there would be no impact.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use?

No impact. The project site and surrounding area do not contain Farmland or forest land. Therefore, project implementation would not result in the conversion of Farmland or forest land from agricultural or timberland uses to nonagricultural or non-forest land uses. No impact would occur, and no mitigation is required.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.3 Air Quality *Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:*				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors or) adversely affecting a substantial number of people?	☐	☐	☒	☐

Environmental Evaluation

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

Setting

The proposed project is located in the City of Anaheim, California, situated in the South Coast Air Basin (SoCAB), which is under the jurisdiction of South Coast Air Quality Management District (SCAQMD). To the west of SoCAB is the Pacific Ocean. To the north and east of the basin are the San Gabriel, San Bernardino, and San Jacinto mountains, while the southern limit of the basin is the San Diego County line. The SoCAB consists of Orange County, all of Los Angeles County except for the Antelope Valley, the non-desert portion of western San Bernardino County, and the western portions of Riverside County. Air quality in the SoCAB is impacted by dominant airflows, topography, atmospheric inversions, location, season, and time of day.

Air quality is measured by the ambient concentrations of seven pollutants that have been identified by the United States Environmental Protection Agency (EPA) due to their potentially harmful effects on public health and the environment. These "criteria air pollutants" include carbon monoxide (CO), ground level ozone, nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter 10 microns or less in diameter (PM_{10}), particulate matter 2.5 microns or less in diameter ($PM_{2.5}$), and lead. The following descriptions of each criteria air pollutant and their health effects are based on information provided by the EPA and SCAQMD.[10]

[10] South Coast Air Quality Management District (SCAQMD). 2017. Final 2016 Air Quality Management Plan.

- **Ozone** is a gas that is formed when reactive organic gases (ROG) and nitrogen oxides (NO_X)—both byproducts of internal combustion engine exhaust—undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are conducive to its formation. Its effects can include the following: irritate respiratory system; reduce lung function; cause breathing pattern changes; reduce breathing capacity; inflame and damage cells that line the lungs; make lungs more susceptible to infection; aggravate asthma; aggravate other chronic lung diseases; cause permanent lung damage; cause some immunological changes; increase mortality risk; and cause vegetation and property damage.
- **CO** is a colorless, odorless gas produced by the incomplete combustion of fuels. CO concentrations tend to be the highest during winter mornings, with little to no wind, when surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines—unlike ozone—and motor vehicles operating at slow speeds are the primary source of CO in the SoCAB, the highest ambient CO concentrations are generally found near congested transportation corridors and intersections. Potential health effects from CO ranges depending on exposure: slight headaches; nausea; aggravation of angina pectoris (chest pain) and other aspects of coronary heart disease; decreased exercise tolerance in persons with peripheral vascular disease and lung disease; impairment of central nervous system functions; possible increased risk to fetuses; and death.
- **NO_2** is primarily a byproduct of fossil fuel combustion and is therefore emitted by automobiles, power plants, and industrial facilities. The principal form of nitrogen oxide produced by fossil fuel combustion is nitric oxide (NO), which reacts quickly to form NO_2, creating the mixture of NO and NO_2 commonly called NO_X NO_2 absorbs blue light and results in reduced visibility and a brownish-red cast to the atmosphere. NO_2 also contributes to the formation of PM_{10}. Nitrogen oxides irritate the nose and throat and increase susceptibility to respiratory infections, especially in people with asthma. Longer exposures to elevated concentrations of NO_2 may even contribute to the development of asthma. The principal concern of NO_X, though, is as a precursor to the formation of ozone.
- **Sulfur Oxides (SO_X)** are compounds of sulfur and oxygen molecules. SO_2 is the predominant form found in the lower atmosphere and is a product of burning sulfur or sulfur-containing materials. Major sources of SO_2 include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. SO_2 may aggravate lung diseases, especially bronchitis. It also constricts breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. SO_2 may cause wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of SO_2, and long-term exposure to both pollutants leads to higher rates of respiratory illnesses.
- **PM_{10} and $PM_{2.5}$** consist of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter, respectively. Some sources of particulate matter, like pollen and windstorms, are naturally occurring. However, in populated areas, most particulate matter is caused by road dust, diesel soot, combustion products, abrasion of tires and brakes, and construction activities. Health effects from short-term exposure (hours per days) can include the following: irrigation of the eyes, nose, throat; coughing; phlegm; chest tightness;

shortness of breath; aggravation of existing lung disease causing asthma attacks and acute bronchitis; those affected with heart disease can suffer heart attacks and arrhythmias. Health effects from long-term exposure can include the following: reduced lung function; chronic bronchitis; changes in lung morphology; and death.

- Airborne lead is emitted from industrial facilities and from the sanding or removal of old lead-based paint. Smelting and other metal processing activities are the primary sources of lead emissions. The lead effects most commonly encountered in current populations are neurological effects in children and cardiovascular effects in adults (e.g., high blood pressure and heart disease). Infants and young children are especially sensitive to even low levels of lead, which may contribute to behavioral problems, learning deficits, and lowered IQ.

Federally, the EPA's Clean Air Act governs the establishment, review, and revision (as appropriate) of National Ambient Air Quality Standards (NAAQS). NAAQS are based on quantitative characterizations of criteria pollutant exposures and their associated risks to human health and the environment and are established based on a comprehensive review of available studies on air quality impacts to human health and the environment. Air quality in California is also governed by the California Clean Air Act (CCAA), which is administered by the ARB at the State level and by air quality management districts and air pollution control districts at the regional and local levels. The ARB is responsible for meeting the State requirements of the federal Clean Air Act (CAA), administering the CCAA, and establishing California Ambient Air Quality Standards (CAAQS). CAAQS are generally as stringent or more stringent than their corresponding NAAQS, and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. CAAQS define clean air: they represent the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without any harmful effects on people or the environment.

Toxic air contaminants (TACs) refer to a diverse group of "non-criteria" air pollutants that can affect human health but have not had ambient air quality standards established for them. This is not because they are fundamentally different from the criteria air pollutants discussed above, but because their effects tend to be local rather than regional. The ARB and the California Office of Environmental Health Hazard Assessment (OEHHA) determine if a substance should be formally identified, or "listed," as a TAC in California. A complete list of these substances is maintained on the ARB's website.[11]

One key TAC is diesel particulate matter (DPM), which is emitted in diesel engine exhaust. Published by SCAQMD in 2021, the Multiple Air Toxics Exposure Study V (MATES V) determined that about 88 percent of the carcinogenic risk from air toxics in SoCAB is attributable to mobile source emissions. Of the three carcinogenic TACs that constitute the majority of known health risk from gas- and diesel-powered vehicle emissions—DPM from mainly trucks, and benzene and 1,3-butadiene from passenger vehicles—DPM is responsible for most of the potential cancer risk. Overall, DPM was found to account for, on average, about 50 percent of the air toxics risk in the SoCAB.[12] In addition to

[11] California Air Resources Board (ARB). 2022. ARB Identified Toxic Air Contaminant Identification Reports. Website: https://ww2.arb.ca.gov/resources/documents/toxic-air-contaminant-identification-reports. Accessed April 18, 2024.

[12] South Coast Air Quality Management District (SCAQMD). 2021. Multiple Air Toxics Exposure Study in South Coast AQMD (MATS V Final Report). August.

its carcinogenic potential, DPM may also contribute to increased respiratory and cardiovascular hospitalizations, worsened asthma and other respiratory symptoms, decreased lung function in children, and premature death for people already with heart or lung disease. Those most vulnerable to the non-cancer health effects of DPM are children whose lungs are still developing and the elderly who may have other chronic health problems.[13]

Volatile organic compounds (VOCs) are typically formed from the combustion of fuels and/or released through the evaporation of organic liquids. Some VOCs are also classified by the State as TACs, though there are no VOC-specific ambient air quality standards. Once emitted, VOCs can mix in the air with other pollutants (e.g., NO_X, CO, SO_2, etc.) and contribute to the formation of photochemical smog.

Construction and operation of the proposed project would be subject to applicable SCAQMD rules and regulations. The SCAQMD Air Quality Analysis Handbook and multiple updated guidelines were developed to assist local jurisdictions and lead agencies in complying with the requirements of CEQA regarding potentially adverse impacts to air quality and have been utilized in the below analysis of the potential air quality impacts of the proposed project.[14]

City of Anaheim General Plan

The City adopted its General Plan in 2004 and a General Plan Update is underway. The City's General Plan addresses a multitude of land use-related issues and provides the following policies related to air quality in the chapter of "Green Element."[15]

Goal 8.1 **Reduce locally generated emissions through improved traffic flows and construction management practices.**

Policy 1 Reduce vehicle emissions through traffic flow improvements, such as traffic signal synchronization, Intelligent Transportation Systems, the Scoot Adaptive Traffic Control System, and related capital improvements.

Policy 2 Regulate construction practices, including grading, dust suppression, chemical management, and encourage pre-determined construction routes that minimize dust and particulate matter pollution.

Policy 3 Reduce single-occupancy vehicle trips.

Goal 10.1 **Improve the efficiency and ridership of public transit within the City.**

[13] California Air Resources Board (ARB). 2022. Overview: Diesel Exhaust & Health. Website: https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health. Accessed March 21, 2024.

[14] South Coast Air Quality Management District (SCAQMD). 2022. CEQA Air Quality Analysis Handbook (1993). Website: https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993). Accessed March 21, 2024.

[15] City of Anaheim. May 2004. City of Anaheim General Plan. Green Element. Website: https://www.anaheim.net/DocumentCenter/View/9521/F-Green-Element?bidId=. Accessed: March 21, 2024.

Goal 11.1 **Encourage land planning and urban design that support alternatives to the private automobile such as mixed-use, provision of pedestrian and bicycle amenities, and transit-oriented development.**

Policy 1 Encourage commercial growth and the development of commercial centers in accordance with the Land Use Element.

Policy 2 Encourage mixed-use development in accordance with the Land Use Element.

Policy 3 Encourage retail commercial uses in or near residential areas and employment centers to lessen vehicle trips.

Policy 4 Encourage higher densities and mixed-use development in the vicinity of major rail and transit stops.

Policy 5 Encourage a diverse mix of retail uses within commercial centers to encourage one-stop shopping.

Policy 6 Locate new public facilities with access to mass transit service and other alternative transportation services, including rail, bus, bicycles and pedestrian use.

Policy 7 Provide everyday opportunities to connect with nature through the promotion of trails, bicycle routes, and habitat friendly landscaping.

Goal 12.1 **Continue to be a County leader in the use of electric and alternative fuel vehicles.**

Policy 1 Continue and expand the program to convert City vehicle fleets to alternative fuel and/or electric power.

Policy 2 Continue the City's program of providing a clean fuel Resort Transit Fleet.

Policy 3 Continue to work with Anaheim businesses to assist with fleet conversion to alternative fuels.

Policy 4 Work with the U.S. Department of Energy to achieve a Clean City designation for the City of Anaheim.

Goal 12.1 **Continue to be a County leader in the use of electric and alternative fuel vehicles.**

Goal 13.1 **Expand citizen and business outreach programs relating to policies that improve air quality.**

Policy 1 Continue to update and improve the City's transit programs and informational resources – both web-based and print media.

Policy 2 Disseminate air quality educational materials to residents, businesses, and schools.

Goal 15.1 **Continue to lead the County in energy conservation programs, practices, and community outreach.**

Goal 15.2 **Continue to encourage site design practices that reduce and conserve energy.**

Policy 1 Encourage increased use of passive and active solar design in existing and new development (e.g., orienting buildings to maximize exposure to cooling effects of prevailing winds and locating landscaping and landscape structures to shade buildings).

Policy 2 Encourage energy-efficient retrofitting of existing buildings throughout the City.

Policy 3 Continue to provide free energy audits for the public.

Goal 16.1 **Continue to monitor and improve the Anaheim Recycle program.**

Policy 1 Continue educational outreach programs for Anaheim's households, businesses, and schools on the need for recycling solid waste.

Policy 2 Provide adequate solid waste collection and recycling for commercial areas and construction activities.

Goal17.1 **Encourage building and site design standards that reduce energy costs.**

Policy 1 Encourage designs that incorporate solar and wind exposure features such as daylighting design, natural ventilation, space planning and thermal massing.

Would the project:

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

Less than significant impact. To evaluate whether or not a project conflicts with, or obstructs the implementation of the applicable air quality plan (2022 Air Quality Management Plan [AQMP] for the SoCAB),[16] the SCAQMD CEQA Air Quality Handbook states that there are two key indicators. These indicators are identified by the criteria discussed below.

1. **Indicator:** Whether the project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
2. **Indicator:** According to Chapter 12 of the SCAQMD CEQA Air Quality Handbook, the purpose of the General Plan consistency findings is to determine whether a project is inconsistent with the growth assumptions incorporated into the air quality plan, and thus, whether it would interfere with the region's ability to comply with federal and California air quality standards.

[16] South Coast Air Quality Management District (SCAQMD). 2022. 2022 Air Quality Management Plan. December.

Considering the recommended criteria in the SCAQMD's 1993 Handbook, this analysis uses the following criteria to address this potential impact:

Criterion 1: Project's contribution to air quality violations (SCAQMD's first indicator)
Criterion 2: Assumptions in AQMP (SCAQMD's second indicator); and
Criterion 3: Compliance with applicable emission control measures in the AQMPs.

Criterion 1: Project's Contribution to Air Quality Violations

According to the SCAQMD, a project is consistent with the AQMP if the project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.[17]

If a project's emissions do not exceed the SCAQMD regional thresholds for VOCs, NO_X, CO, SO_X, PM_{10} or $PM_{2.5}$, it follows that the project's emissions would not exceed the allowable limit for each project in order for the region to attain and maintain ambient air quality standards, which is the primary goal of air quality plans. As shown in Impact 2.3(b) below, the proposed project's regional construction and operational emissions would not exceed the SCAQMD regional thresholds of significance. Furthermore, as described in Impact 2.3(c) below, the proposed project's localized construction and operational emissions would not exceed the project location-specific SCAQMD localized construction and operational analyses use localized significance thresholds (LSTs). Considering this information, the proposed project's construction and operational emissions would not contribute substantially to potential air quality violations and thus would comply with the applicable air quality plan.

Criterion 2: Assumptions in the Air Quality Management Plan

The development of emission burdens used in AQMPs to demonstrate compliance with ambient air quality standards is based, in part, on land use patterns contained within local general plans. Therefore, it is reasonable to conclude that if a project is consistent with the applicable general plan land use designation, and if the general plan was adopted prior to the applicable AQMP, then the growth of Vehicle Miles Traveled (VMT) and/or population generated by said project would be consistent with the growth in VMT and population assumed within the AQMP. The City of Anaheim adopted its General Plan in 2004, which is prior to the adoption of the AQMP. The City adopted its General Plan Land Use Map in 2004 and has revised it as recently as March 2019. As previously discussed, the project site is currently designated as Low Medium Density Residential in the General Plan Land Use Plan that allows for up to 18 dwelling units per acre and is zoned Industrial (I) with a Residential Overlay. The proposed project consists of the development of 56 townhomes on a 2.05 acre project site, which would result in a density of 27.3 dwelling units per acre. As such, the project applicant is requesting a GPA to redesignate the project site to Medium Density Residential, which allows for up to 36 dwelling units per acre.

[17] South Coast Air Quality Management District (SCAQMD). Air Quality Management Plan. Website: https://www.aqmd.gov/home/air-quality/clean-air-plans. Accessed April 12, 2024.

Although the proposed project is currently inconsistent with the General Plan land use designation for the project site, the proposed townhomes would be compatible with the existing multi-family residential uses that are located to the north of the project site, and would provide housing in close proximity to the existing commercial uses to the west, which would promote a walkable community. The project site is also in close proximity to the Orange County Transportation Authority (OCTA) bus stops that are located along Anaheim Boulevard (390 feet west of the project site). Furthermore, the majority of the project trips and associated emissions associated with the project site would have been accounted for in the AQMP as trips and emissions associated with the existing industrial use. As further described in the Land Use and Planning section of this document, implementation of the proposed project would not cause any significant adverse effects associated with land use and planning. Emissions associated with the current allowable land use and the proposed use of the project site would be comparable. As described later in this document, under Population and Housing, impacts associated with the proposed project's potential to induce substantial unplanned population growth was found to be less than significant. Considering the proposed project's less than significant impacts related to land use and population, growth supported by the proposed project is reasonably accounted for in the AQMP.

Criterion 3: Control Measures

The AQMP contains a number of control measures, which are enforceable requirements through the adoption of rules and regulations. Applicable rules and regulations are listed below. The proposed project would comply with all applicable SCAQMD rules and regulations. Therefore, the proposed project complies with applicable emission control measures in the AQMPs.

Summary

In summary, the proposed project would not exceed the growth assumptions in the AQMP. The proposed project would not result in a regional or localized exceedance of criteria air pollutants and would comply with all applicable SCAQMD rules and regulations. Accordingly, the proposed project would not conflict with or obstruct implementation of the applicable air quality plans, and, therefore, this impact would be less than significant.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard?

Less than significant impact. This impact is related to the cumulative effect of a project's regional criteria pollutant emissions. As described above, the region is currently in nonattainment for ozone, PM_{10}, and $PM_{2.5}$. By its nature, air pollution is largely a cumulative impact resulting from emissions generated over a large geographic region. The nonattainment status of regional pollutants is a result of past and present development within the SoCAB, and this regional impact is a cumulative impact. In other words, new development projects (such as the proposed project) within the SoCAB would contribute to this impact only on a cumulative basis. No single project would be sufficient in size, by itself, to result in nonattainment of regional air quality standards. Instead, a project's emissions may be individually limited, but cumulatively considerable when taken in combination with past, present, and future development projects. All new development that would result in an increase in air

pollutant emissions above those assumed in regional air quality plans would contribute to cumulative air quality impacts.

The cumulative analysis focuses on whether a specific project would result in cumulatively considerable emissions. According to Section 15064(h)(4) of the CEQA Guidelines, the existence of significant cumulative impacts caused by other projects alone does not constitute substantial evidence that a project's incremental effects would be cumulatively considerable.

Rather, the determination of cumulative air quality impacts for construction and operational emissions is based on whether a project would result in regional emissions that exceed the SCAQMD regional thresholds of significance for construction and operations on a project level. Projects that generate emissions below the SCAQMD significance thresholds would be considered consistent with regional air quality planning efforts and would not generate cumulatively considerable emissions.

The proposed project's regional construction and operational emissions, which include both on- and off-site emissions, are evaluated separately below. Construction and operational emissions from the proposed project were estimated using the California Emissions Estimator Model (CalEEMod) Version 2022.1. A detailed description of the assumptions used to estimate emissions and the complete CalEEMod output files are contained in Appendix A.

Cumulative Construction Emissions

Construction emissions are described as "short-term" or temporary in duration; however, they have the potential to represent a significant impact with respect to air quality. Construction of the proposed project would result in the temporary generation of VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$ emissions from construction activities such as demolition, grading, building construction, architectural coating, and asphalt paving. Fugitive dust emissions are primarily associated with earth disturbance and grading activities, and vary as a function of soil silt content, soil moisture, wind speed, acreage of disturbance area, and miles traveled by construction vehicles on-site and off-site.

Construction-related NO_X emissions are primarily generated by exhaust emissions from heavy-duty construction equipment, material and haul trucks, and construction worker vehicles. VOC emissions are mainly generated by exhaust emissions from construction vehicles, off-gas emissions associated with architectural coatings, and asphalt paving. The proposed project would reduce criteria pollutant and ozone precursor emissions through the implementation of a variety of construction emission reduction measures such as using low emission equipment, utilizing existing power sources, and managing construction traffic in a way to avoid or reduce traffic impacts and subsequent emissions.

Construction of the proposed project is anticipated to start around the fourth quarter of 2025 and last approximately a year. The duration of construction activity and associated equipment represent a reasonable approximation of the expected construction fleet as required by CEQA Guidelines. Because the SCAQMD's regional (and LSTs) are representative of maximum daily emissions that would not be expected to cause or contribute to an exceedance of the most stringent NAAQS or CAAQS for pollutants, the objective of the proposed project's CalEEMod analysis is to determine whether the proposed project's maximum one-day construction emissions would have the potential to exceed these thresholds. As such, the proposed project's CalEEMod analysis relies on conservative

construction assumptions and generalized equipment scenarios that likely overestimate maximum daily construction emissions in an effort to conclusively rule out the possibility that threshold exceedances could occur. Construction is a dynamic process and day-to-day emissions can vary widely—even within the same construction phase or sub-phase. This analytical approach therefore minimizes the potential for inadvertently underestimating daily construction emissions, which are the basis of SCAQMD's air pollutant thresholds. The likelihood that the maximum daily construction emissions estimated by this analysis would occur on a given construction workday is low.

Table 1 presents the proposed project's maximum daily construction emissions during the entire construction duration using the worst-case summer or winter daily construction-related criteria pollutant emissions for each phase of construction. Complete CalEEMod output files are included as part of Appendix A.

Table 1: Daily Regional Construction Emissions

Construction Year	Regional Pollutant Emissions (pounds per day)[1]					
	VOCs	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Winter						
2025	1.69	23.3	18.9	0.07	4.84	2.13
2026	70.6	10.4	13.7	0.02	0.94	0.47
Summer						
2026	1.32	10.4	14.0	0.02	0.94	0.47
Existing Total Daily Emissions	6.7	12.1	39.3	0.1	13.1	3.6
Maximum Daily Emissions	**70.6**	**23.3**	**39.3**	**0.07**	**4.84**	**2.13**
SCAQMD Significance Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
VOCs = volatile organic compounds; NO_X = oxides of nitrogen; CO = carbon monoxide; SO_X =sulfur oxides
PM_{10} = particulate matter with aerodynamic diameter less than 10 microns
$PM_{2.5}$ = particulate matter with aerodynamic diameter less than 2.5 microns
The PM_{10} and $PM_{2.5}$ emissions reflect the combined exhaust and fugitive dust emissions the have been reduced through implementation of SCAQMD Rule 403 requirements.

Source of emissions: CalEEMod Output (see Appendix A).
Source of thresholds: SCAQMD 2015.

As shown above in Table 1, the proposed project's regional construction emissions would not exceed SCAQMD regional significance thresholds for VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$. Therefore, the cumulative impact of the proposed project's construction emissions on regional air quality would be less than significant.

Cumulative Operational Emissions

Following construction of the proposed project, long-term operational emissions would be generated from day-to-day project operations. Operational emissions for land use development projects are typically distinguished as mobile-, area-, and energy-source emissions. Mobile source emissions are those associated with automobiles that would travel to and from a project site. Area-source emissions are those associated with consumer products, landscape maintenance activities, and periodic architectural coatings. Energy-source emissions are those associated with natural gas usage on-site, since the proposed project would be an all-electric development, the natural gas usage in CalEEMod was set to zero. Table 2 presents the proposed project's maximum daily operational emissions between summer and winter seasons.

Table 2: Daily Regional Operational Emissions

Operational Activity	Regional Pollutant Emissions (pounds per day)[1]					
	VOCs	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Mobile	1.10	0.82	8.85	0.02	2.25	0.58
Area	2.86	0.06	3.19	<0.01	<0.01	<0.01
Energy	0.00	0.00	0.00	0.00	0.00	0.00
Total Operational Emissions	**3.96**	**0.88**	**12.04**	**0.02**	**2.25**	**0.58**
SCAQMD Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
VOCs = volatile organic compounds; NO_X = oxides of nitrogen; CO = carbon monoxide; SO_X =sulfur oxides
PM_{10} = particulate matter with aerodynamic diameter less than 10 microns
$PM_{2.5}$ = particulate matter with aerodynamic diameter less than 2.5 microns
[1] Emissions shown represent the maximum daily emissions from summer and winter seasons for each operational emission source and pollutant. Therefore, total daily operational emissions represent maximum daily emissions that could occur throughout the year.

Source of emissions: CalEEMod Output (see Appendix A).
Source of thresholds: SCAQMD 2015.

As shown in Table 2, the proposed project's daily operational emissions would not exceed any of SCAQMD's thresholds of significance. Considering that the project's net long-term operational emissions would not exceed any significance thresholds, the proposed project would not result in a cumulatively considerable net increase of operational emissions. The cumulative impact from long-term operation of the project would therefore be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than significant impact. This impact evaluates the potential for the proposed project's construction and operational emissions to expose sensitive receptors to substantial pollutant concentrations. Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. Sensitive land uses, or "sensitive

receptors," are those where sensitive individuals are most likely to spend time. Individuals most susceptible and/or sensitive to poor air quality include children, the elderly, athletes, and those with cardiovascular and chronic respiratory diseases. As a result, land uses sensitive to air quality may include schools (i.e., elementary schools or high schools), child care centers, parks and playgrounds, long-term health care facilities, rehabilitation facilities, convalescent facilities, retirement facilities, residences, and athletic facilities. For the purposes of CEQA analysis, the SCAQMD considers a sensitive receptor to be a receptor such as a residence, hospital, or convalescent facility where it is possible that an individual could remain for 24 hours. The SCAQMD does not consider commercial or industrial facilities to be sensitive receptors because employees do not typically remain on-site at such facilities for 24 hours but are present for shorter periods, such as 8-hour shifts. However, the SCAQMD suggests that LSTs based on shorter averaging periods, such as the NO_2 and CO LSTs, may also be applied to receptors such as commercial and industrial facilities since it is reasonable to assume that workers at these sites may be present for up to 8 hours.[18]

Criterion 1: LST assessment: emissions and air quality impacts during project construction or operation must be below the applicable LSTs to screen out of needing to provide a more detailed air quality analysis. If the proposed project exceeds any applicable LST when the mass rate Lookup Tables are used as a screening analysis, then project-specific air quality modeling may be performed to determine significance.

Criterion 2: A CO hotspot assessment must demonstrate that the project would not result in the development of a CO hotspot that would result in an exceedance of the CO ambient air quality standards.

Criterion 3: TAC analysis must demonstrate that the project would not result in significant health risk impacts to sensitive receptors during construction.

Criterion 1: Localized Significance Threshold Analysis—Criteria Pollutants

The localized construction and operational analyses use thresholds (i.e., LSTs) that represent the maximum emissions for a project that would not cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standard.[19] They are developed based on the ambient concentrations of a given pollutant for a Source Receptor Area and distances to the nearest receptor. The SCAQMD provides LSTs for NO_X, CO, PM_{10}, and $PM_{2.5}$. The SCAQMD does not provide a LST for SO_2 because land use development projects typically result in negligible construction and long-term operational emissions of this pollutant. There is no ambient standard or SCAQMD LST for VOCs because VOCs are not a criteria pollutant. If the proposed project's construction and/or operational emissions would not exceed SCAQMD LSTs, then the proposed project would not cause or contribute to an exceedance of a federal or State ambient air quality standard and would not expose sensitive receptors to substantial pollutant concentrations.

[18] South Coast Air Quality Management District (SCAQMD). 2008. Final Localized Significance Threshold Methodology. Revised July 2008. Accessed August 5, 2024.

[19] South Coast Air Quality Management District (SCAQMD). 2009. Final Localized Significance Threshold Methodology, Appendix C. Revised October 21, 2009. Website: https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds. Accessed August 5, 2024.

The LST Methodology provides Lookup Tables with different thresholds based on the location and size of the project site and distance to the nearest sensitive receptors. The project site is located in Source Receptor Area No. 17, "Central Orange County." The Lookup Tables provided in the LST Methodology include project site acreage sizes of 1-acre, 2 acres and 5 acres. Since the project site is 2.05 acres, 2-acre thresholds were utilized in order to provide a conservative analysis. The nearest sensitive receptors are residents at the multi-family homes on the north side of the project site that are located as near as 23 feet (7 meters) north of the project site. According to LST Methodology, any receptor located closer than 25 meters (82 feet) shall be based on the 25-meter thresholds.

Localized Construction Analysis

Table 3 presents maximum daily emissions created during construction of the proposed project and compares the results with the applicable LSTs. It should be noted this provides for a worst-case analysis as the emissions shown in Table 3 includes both on-site and off-site sources of emissions, while the LSTs are only applicable to the on-site emissions. The CalEEMod analysis assumes that all construction activities would comply with SCAQMD Rule 403 for fugitive dust, as is mandatory for all construction projects in the SoCAB.

Table 3: Construction Localized Significance Screening Analysis

Construction Year	Construction Emissions (Pounds per day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Winter				
2025	23.3	18.9	4.84	2.13
2026	10.4	13.7	0.94	0.47
Summer				
2026	10.4	14.0	0.94	0.47
Maximum Daily Emissions	**23.3**	**18.9**	**4.84**	**2.13**
SCAQMD LST Significance Threshold	**115**	**715**	**6**	**4**
Exceed Threshold?	**No**	**No**	**No**	**No**

Notes:
CO = carbon monoxide
NO_X = oxides of nitrogen
PM_{10} = particulate matter less than 10 microns in diameter
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter

Source of emissions: Appendix A.
Source of thresholds: South Coast Air Quality Management District (SCAQMD). 2009. LST Methodology Appendix C – Mass Rate LST Lookup Table. October.

As shown in Table 3, the proposed project's maximum daily construction emissions would not exceed SCAQMD LSTs for NO_X, CO, PM_{10} and $PM_{2.5}$; therefore, localized construction impacts related to these air pollutants would be less than significant.

Localized Operational Analysis

Table 4 presents the proposed project's operational emissions from area sources, energy usage, and vehicles operating in the immediate vicinity of the project site. Table 4 then compares the maximum daily on-site emissions with the appropriate LSTs.

Table 4: Operational Localized Screening Significance Analysis

Emissions Source	Pounder per Day			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Mobile[1]	0.10	1.11	0.28	0.07
Area	0.06	3.19	<0.01	<0.01
Energy	0.00	0.00	0.00	0.00
Maximum Daily On-site Operational Emissions	**0.16**	**4.30**	**0.28**	**0.07**
Localized Significance Thresholds	115	715	2	1
Exceed Threshold?	**No**	**No**	**No**	**No**

Notes:
CO = carbon monoxide
NO_X = oxides of nitrogen
PM_{10} = particulate matter less than 10 microns in diameter
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter
[1] Mobile based on 1/8 of the total mobile emissions, which is the estimated portion of vehicle emissions occurring within a quarter mile of the project site.

Source of Emissions: Appendix A.
Source of thresholds: South Coast Air Quality Management District (SCAQMD). 2009. LST Methodology Appendix C – Mass Rate LST Lookup Table. October.

As shown in Table 4, the proposed project's maximum daily on-site emissions would not exceed SCAQMD LSTs for NO_X, CO, PM_{10} and $PM_{2.5}$; therefore, localized operational impacts related to these air pollutants would be less than significant.

Criterion 2: Carbon Monoxide Hotspot Analysis

The proposed project would generate traffic that produces and contributes to off-site emissions, but this traffic generation would not result in exceedances of CO air quality standards at nearby roadways due to three key factors. First, CO hotspots are rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to the surrounding area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology and the increasing penetration of this technology in the vehicle fleet. CO levels in the proposed project's area are well below federal and State standards, as are CO levels in the SoCAB itself. No exceedances of CO have been recorded at nearby monitoring stations for some time, and the SoCAB is currently designated as a CO attainment area for both CAAQS and NAAQS. Finally, the proposed project would not contribute to the levels of congestion and emissions necessary to trigger a potential CO hotspot. Therefore, the proposed project's potential to expose

sensitive receptors to substantial CO concentrations as a result of CO hotspots would be less than significant.

Criterion 3: TAC Analysis

Construction activities are anticipated to generate TAC emissions from DPM associated with the operation of trucks and off-road equipment and from possible asbestos in the buildings to be demolished.

Diesel Particulate Matter Emissions

The greatest potential for toxic air contaminant emissions would be related to DPM emissions associated with heavy equipment operations during construction of the proposed project. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of "individual cancer risk." "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 70-year lifetime will contract cancer, based on the use of standard risk assessment methodology. It should be noted that the most current cancer risk assessment methodology recommends analyzing a 30 year exposure period for the nearby sensitive receptors.[20]

Given the relatively limited number of heavy-duty construction equipment, the varying distances that construction equipment would operate to the nearby sensitive receptors, and the short-term construction schedule, the proposed project would not result in a long-term (i.e., 30 or 70 years) substantial source of toxic air contaminant emissions and corresponding individual cancer risk. In addition, California Code of Regulations Title 13, Article 4.8, Chapter 9, Section 2449 regulates emissions from off-road diesel equipment in California. This regulation limits idling of equipment to no more than five minutes, requires equipment operators to label each piece of equipment and provide annual reports to ARB of their fleet's usage and emissions. This regulation also requires systematic upgrading of the emission Tier level of each fleet, and currently no commercial operator is allowed to purchase Tier 0, Tier 1 or Tier 2 equipment. In addition to the purchase restrictions, equipment operators need to meet fleet average emissions targets that become more stringent each year between years 2014 and 2023. Therefore, due to the limitations in off-road construction

equipment DPM emissions from implementation of Section 2448, a less than significant short-term TAC impacts would occur during construction of the proposed project from DPM emissions.

Asbestos Emissions

It is possible that the existing on-site structures to be demolished contain asbestos. According to SCAQMD Rule 1403 requirements, prior to the start of demolition activities, the existing gymnasium shall be thoroughly surveyed for the presence of asbestos by a person that is certified by the California Division of Occupational Safety and Health (Cal/OSHA) for asbestos surveys. Rule 1403 requires that the SCAQMD be notified a minimum of 10 days before any demolition activities begin with specific details of all asbestos to be removed, start and completion dates of demolition, work practices and engineering controls to be used to contain the asbestos emissions, estimates on the amount of asbestos to be removed, the name of the waste disposal site where the asbestos will be

[20] Office of Environmental Health Hazard Assessment. 2015. Air Toxics Hotspot Program. Risk Assessment Guidelines. Website: https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf. Accessed April 17, 2024.

taken, and names and addresses of all contractors and transporters that will be involved in the asbestos removal process. Therefore, through adherence to the asbestos removal requirements, detailed in SCAQMD Rule 1403, a less than significant asbestos impact would occur during construction of the proposed project.

d) Result in other emission (such as those leading to odors) adversely affecting a substantial number of people?

Less than significant impact. Odor impacts on residential areas and other sensitive receptors, such as hospitals, daycare centers, or schools warrant the closest scrutiny, but consideration should also be given to other land uses where people may congregate, such as recreational facilities, worksites, and commercial areas.

Odors can cause a variety of responses. The impact of an odor is dependent on interacting factors such as frequency (how often), intensity (strength), duration (in time), offensiveness (unpleasantness), location, and sensory perception. While offensive odors rarely cause any physical harm, they still can be very unpleasant, leading to considerable distress and often generating citizen complaints to local governments and regulatory agencies. Potential odor impacts have been analyzed separately for construction and operations below.

Construction-Related Odor Impacts

Potential sources that may emit odors during construction activities include the application of coatings such as asphalt pavement, paints and solvents and from emissions from diesel equipment. Standard construction requirements that limit the time of day when construction may occur as well as SCAQMD Rule 1108 that limits VOC content in asphalt and Rule 1113 that limits the VOC content in paints and solvents would minimize odor impacts from construction. As such, the objectionable odors that may be produced during the construction process would be temporary and would not likely be noticeable for extended periods of time beyond the project site's boundaries. Through compliance with the applicable regulations that reduce odors and due to the transitory nature of construction odors, a less than significant odor impact would occur and no mitigation would be required.

Operations-Related Odor Impacts

The proposed project would consist of the development of a multi-family residential development. Potential sources that may emit odors during the ongoing operations of the proposed project would primarily occur from the trash storage areas. Pursuant to City regulations, permanent trash enclosures that protect trash bins from rain as well as limit air circulation would be required for the trash storage areas. Because of the distance of the nearest receptors from the project site and through compliance with SCAQMD's Rule 402, City trash storage regulations, a less than significant impact related to odors would occur during the ongoing operations of the proposed project.

Therefore, a less than significant odor impact would occur and no mitigation would be required.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.4 Biological Resources *Would the project:*				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service?	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?	☐	☐	☐	☒

Environmental Evaluation

Setting

The project site is a former lumber yard and mill currently used as valet parking and storage for trolleys associated with adjacent retail use. The project site is entirely paved or covered by structures that are remnants of previous industrial use and is extremely flat with sparse ornamental vegetation. Notable trees within the project site include a mature pine tree (*Pinus spp.*) between the existing buildings (on South Philadelphia Street) and numerous street trees along East Santa Ana Street. The project vicinity is also hardscaped and is characterized by residential and commercial land uses.

Biological resources within the City of Anaheim are diverse despite being heavily developed. The City's biological resources exist among urban geography of parklands, natural areas, urban forests, community gardens, and neighborhoods. Despite its urban development, the City has significant areas of natural ecosystems, including the Hill and Canyon Area. The Hill and Canyon Area extends generally along the Santa Ana River to the Riverside County line and hillside terrain and vegetation that hosts a variety of wildlife.

Existing biological resources on or near the project site include ornamental trees and shrubs planted along the surrounding sidewalk. High levels of ambient noise, traffic, large hardscaped buildings, heavy pedestrian traffic, and light pollution from surrounding buildings are all sources of biological disturbance on or near the proposed site. Consequently, current wildlife residing on or near the project site are tolerant to current disturbances due to long-term exposure.

Would the project:

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

Less than significant impact. Prior to the reconnaissance-level field survey, a literature review was conducted to identify potential biological resources that could be present on-site, including a search of the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB) and the California Native Plant Society (CNPS) Electronic Inventory (CNPSEI). Both search queries were focused within the *Anaheim, California* United States Geological Survey (USGS) 7.5-minute Topographic Quadrangle map and seven surrounding quadrangles.[21,22] The search queries determined that 32 special-status plant species and 49 special-status wildlife species have been recorded within vicinity of the project site. Of these 81 special-status species, it was determined that none are expected to occur within the project site due to absence of suitable habitat, previous land use, and ground disturbance on-site (Appendix B – Special-Status Species Evaluation Tables).

Of the federal and State-listed threatened and/or endangered wildlife species and State Species of Special Concern that have the potential to occur in the project area, all species but three—western mastiff bat (*Eumops perotis californicus*), coastal California gnatcatcher (*Polioptila californica californica*), and Southern California legless lizard (*Anniella stebbinsi*))—were determined unlikely to occur due to lack of suitable habitat and/or lack of recorded occurrence in the project vicinity.

The existing buildings and ornamental trees on-site contain marginally suitable roosting habitat to support the western mastiff bat. CNDDB records indicate three historical occurrences recorded within 5 miles of the project site, the most recent in 1990.[23] CNDDB records indicate three

[21] California Department of Fish and Wildlife (CDFW). 2024. CNDDB RareFind 5 California Natural Diversity Database Query for Special-Status Species. Website: https://wildlife.ca.gov/Data/CNDDB/Maps-and-Data. Accessed January 23, 2024.

[22] California Native Plant Society (CNPS). 2024. California Native Plant Society Rare and Endangered Plant Inventory. Website: https://rareplants.cnps.org/. Accessed January 23, 2024.

[23] California Department of Fish and Wildlife (CDFW). 2024. CNDDB RareFind 5 California Natural Diversity Database Query for Special-Status Species. Website: https://wildlife.ca.gov/Data/CNDDB/Maps-and-Data. Accessed August 5, 2024.

occurrences of coastal California gnatcatcher within 5 miles of the project site, the most recent in 2007.[24] However, the site does not contain suitable coastal sage scrub habitat to support this species. Lastly, CNDDB records indicate two occurrences of Southern California legless lizard within 5 miles of the project site, the most recent in 2019. However, the site does not contain suitable vegetation communities or soils to support this species.[25]

Bird species are protected by the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code Sections 3503, 3503.5, and 3513.93. Additionally, California Fish and Game Code Sections 2000 and 4150 state that it is unlawful to take or possess special-status species, including reptiles and bats, without a license or permit as required by Section 3007. Additionally, Title 14 of the California Code of Regulations states it is unlawful to harass special-status species, including protected birds and bats. To "harass" is defined as "an intentional act which disrupts an animal's normal behavior patterns, which includes, but is not limited to, breeding, feeding or sheltering." Adherence to General Plan policies, MBTA, and CDFW regulations would provide for the protection of special-status birds and bats, including their nests, roosts, eggs and young. Compliance with State, federal and local laws and regulations, which could require focused surveys and relocation of bats (if present) or obtaining required permits and agreements; and compliance with the applicable policies contained in the General Plan would reduce impacts to species to a less than significant level, and no mitigation measures are required.

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

No impact. The project site is fully developed and is composed mostly of impervious surfaces with sparse ornamental vegetation. There is no riparian, wetland communities, or other sensitive natural communities on-site or within disturbance distance. Therefore, no substantial adverse effects would occur, and there would be no impact.

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?

Less than significant impact. The proposed project site does not contain any wetlands nor is it adjacent to existing wetlands. There would be no substantial adverse effect on wetlands through direct removal, filling, or hydrological interruption. However, indirect impacts can occur such as the potential release of pollutants caused by project implementation through the stormwater system. During construction, activities such as grading, and demolition create pollutants that can leave the site and harm nearby waterways. Sediment is one of the main pollutants of concern. When it rains, stormwater washes over the loose soil on a construction site, along with various materials and products being stored outside. As stormwater flows over the site, it can pick up pollutants such as chemicals, debris, loose soil, sediment, and spilled fluids. These pollutants can be transported to

[24] Ibid.

[25] California Department of Fish and Wildlife (CDFW). 2023. CNDDB RareFind 5 California Natural Diversity Database Query for Special-Status Species. Website: https://wildlife.ca.gov/Data/CNDDB/Maps-and-DataAccessed August 5, 2024.

nearby storm drains or directly into local creeks or larger bodies of water.[26] Potential waterbodies at risk for pollutants include the Santa Ana River, located approximately 2.3 miles east of the project site.

To ensure water quality in nearby bodies of water, the applicant must comply with the applicable provisions of the Clean Water Act (CWA) and Porter-Cologne Water Quality Control Act, including stormwater control, and require that a discharge of any pollutant or combination of pollutants to surface waters be regulated by a National Pollutant Discharge Elimination System (NPDES) permit.[27] With compliance with applicable water quality laws and regulations, including the CWA and Porter-Cologne Water Quality Control Act, the potential impacts on protected wetlands or adjacent bodies of water would be less than significant.

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 wildlife nursery sites?

Less than significant impact. Potential impacts to wildlife nursery sites or wildlife movement corridors are further discussed below.

Wildlife Nursery Sites

The project site is fully developed; however, building rooftops and adjacent ornamental trees could support native nursery sites in the form of nests of native birds and roosting bats. Project implementation, such as demolition and construction, could result in both direct and indirect disturbances, causing loss of eggs, altricial young, or discouraging nesting and/or roosting on or near the project site.

The MBTA and California Fish and Game Code prohibit activities that result in the loss of eggs or altricial young. In accordance with the MBTA and the California Fish and Game Code, the proposed project would be required to comply with federal and State wildlife protection laws, including those for special-status birds and bats. Compliance with existing regulations would ensure that impacts are at a less than significant level.

Wildlife Movement

The project applicant proposes to demolish the existing buildings and improvements on-site and develop a new residential infill community consisting of 56 for-sale 3-story condominium townhomes, roadways, walkways, parking, and a recreational amenity area within the project site. The proposed project incorporates amenities including recreational-leisure areas, private patios, common amenity areas, and various landscaping throughout the site.

Migrating birds regularly pass through the City of Anaheim, which is situated along the Pacific Flyway, a migratory route that is used by numerous avian species. The installation of lighting on

[26] West Valley Clean Water Authority. How Construction Contributes to Water Pollution. Website: https://www.cleancreeks.org/167/How-Construction-Contributes-to-Water-Po. Accessed August 5, 2024.

[27] California State Water Resources Control Board (State Water Board). November 2021. National Pollutant Discharge Elimination System (NPDES). Website: https://www.waterboards.ca.gov/water_issues/programs/npdes/drinkingwatersystems.html#:~:text=Section%20402%20of%20the%20Clean,Elimination%20System%20(NPDES)%20permit. Accessed August 5, 2024.

buildings and around roads, paths, and parking lots may result in potential impacts on migratory species. Many animals, both special-status and common species, are sensitive to light cues. Special behavior of animals is influenced by luminance–the visibility and intensity of the surface brilliance of objects (such as lamps and lighted windows). Birds may be attracted to lights and brightly lit structures. Birds migrating at night, especially with an overcast sky, may become disorientated.[28] California Energy Commission (CEC), Title 24 establishes lighting standards and requires any lighting that is used on-site must be shielded to avoid upward-facing luminance. Additionally, bird-safe treatment of transparent or reflective surfaces and/or shading have the potential to reduce window collision risk significantly.

With implementation of the generally applicable Title 24 standards, and standards for Bird-Safe Buildings, potential significant impacts on migratory birds would be less than significant, and no additional mitigation is required.

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

Less than significant impact. As discussed above, the project site contains ornamental trees, including a mature pine tree and numerous street trees. The removal of street trees or specimen trees, as well as the planting of new street trees, is subject to the provisions of the Anaheim Municipal Code. It should be noted that the existing pine tree on-site would not qualify as a specimen tree as defined by the City. The proposed project would comply with City standards by obtaining any required tree removal permits and replacing any removed trees. Additionally, as discussed above, the proposed project would comply with regulations for bird-safe design.

With compliance of applicable policies in the Anaheim Municipal Code, and compliance with existing federal and State bird protection laws, the proposed project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant.

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

No impact. The eastern portion of the City of Anaheim is under the jurisdiction of County of Orange Natural Communities Conservation Plan/Habitat Conservation Plan (CONCCP/HCP). The proposed project is not located within or adjacent to the CONCCP/HCP boundary. Project implementation would not conflict with or have a substantial effect on any conservation plans.

Mitigation Measures

None required.

[28] Molenar, Sanders, Jonkers. 2013. Ecological Consequences of Artificial Night Lighting. Website: https://books.google.com/books?id=dEEGtAtR1NcC&dq=de+Molenaar+et+al.+2006&lr=&source=gbs_navlinks_s. Accessed August 5, 2024.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.5 Cultural Resources and Tribal Cultural Resources *Would the project:*				
a) Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐
Would the project cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:				
d) 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	☐	☒	☐	☐
e) 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 I of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision I of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.	☐	☒	☐	☐

Environmental Evaluation

Setting

This section describes the existing cultural resources setting and potential effects from the proposed project's implementation on the project site and its surrounding area. Descriptions and analysis in this section are based on information provided by the California Native American Heritage Commission (NAHC), South Central Coastal Information Center (SCCIC), National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), California Historic Landmarks list, California Points of Historical Interest list, California Built Environment Resource Directory (BERD), and the California Historical Resources Inventory and a Historic Built Environment Assessment report conducted (HBEA) by South Environmental. Relevant non-confidential records search results and other correspondence are included in Appendix C.

South Central Coastal Information Center

A records search and literature review were conducted on December 20, 2023, at the SCCIC located at California State University, Fullerton, for the project site and a 0.5-mile radius surrounding it. The purpose of this review was to access existing cultural resource survey reports, archaeological site records, historical aerial photographs, and historic maps and evaluate whether any previously documented prehistoric or historic archaeological sites, architectural resources, cultural landscapes, or other resources exist within or near the project site.

The results from the SCCIC records search indicate that there are 17 historic resources recorded within the 0.5-mile search radius, none of which are located within the project site boundaries. In addition, 10 area-specific survey reports are on file with the SCCIC, none of which are located within the project boundaries, suggesting that the project site has not been previously surveyed for cultural resources. A records search map identifying the project boundaries and a 0.5-mile search radius along with relevant non-confidential records search results can be found in Appendix C.

Native American Heritage Commission

On December 20, 2023, FirstCarbon Solutions (FCS) sent a request to the NAHC in an effort to determine whether any sacred sites are listed on its Sacred Lands File (SLF) for the project site. Or its vicinity and to receive a consultation list of any Tribal representatives who may be interested in consulting on the proposed project pursuant to Assembly Bill (AB) 52.

A response was received on January 18, 2024, indicating that the SLF search results was negative for the presence of Native American cultural resources in the immediate project area. The NAHC included a list of 22 Tribal Representatives that may offer additional information regarding the project site. To ensure that all Native American knowledge and concerns over potential Tribal Cultural Resources (TCRs) that may be affected by the proposed project are addressed, a letter containing project information and requesting additional information was sent to each Tribal representative on either January 31 or February 1, 2024. No responses have been received to date.

Pedestrian Survey and Site Visit

On January 25, 2024, FCS Staff Archaeologist William Gillean conducted the pedestrian survey for unrecorded cultural resources within the project site. The project site consists of a west–east trending rectangle composed of two blocks, extending from South Claudina Street in the west to South Olive Street in the east and from East Santa Ana Street in the south to an unnamed alley in the north. Survey conditions were documented using digital photographs and field notes.

The entire site is developed with asphalt, concrete sidewalks, landscaping, ornamental vegetation, and street furniture, consisting of streetlamps. During the survey, Mr. Gillean examined all areas of the surface for prehistoric artifacts (e.g., fire-affected rock, milling tools, flaked stone tools, toolmaking debris, ceramics), soil discoloration and depressions that might indicate the presence of a cultural midden, faunal and human osteological remains, and features indicative of the former presence of structures or buildings (e.g., postholes, standing exterior walls, foundations) or historic debris (e.g., glass, metal, ceramics).

Particular attention was paid to the built environment and recorded buildings and structures that appeared to be over 45 years of age. Three structures of possible historic age were noted during the survey. Two of the structures, one a large storage shed area and the other a modular office type structure, are located at 275 East Santa Ana Street. The other structure is located at 301 East Santa Ana Avenue.

All areas of the project site were closely inspected for culturally modified soils or other indicators of potential historic or prehistoric resources. No prehistoric resources or raw materials commonly used in the manufacture of tools (e.g., obsidian, Franciscan chert) were observed.

Historic Built Environment Assessment

In California, the term "historical resource" includes but is not limited to "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (California Public Resources Code [PRC] § 5020.1(j)) The criteria for listing resources on the CRHR (enumerated below) were expressly developed to be in accordance with previously established criteria developed for listing in the NRHP. According to California Public Resources Code Section 5024.1I (1–4), a resource is considered historically significant if it (1) retains "substantial integrity," and (2) meets at least one of the following criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

In order to understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (see 14 CCR 4852(d)(2)). The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are the State landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

According to the Historic Built Environmental Assessment for the proposed project, the subject properties located at 275 and 375 East Santa Ana Street (APNs 037-024, 037-111-29, and 037-111-30) were found not eligible under all State and local designation criteria and integrity requirements (Appendix C.4). Therefore, they are not considered historical resources under CEQA. However, the subject property is located within the boundaries of the Anaheim Colony Historic District and

potential impacts to the district resulting from proposed new construction must be considered. The subject properties were evaluated against the Anaheim Colony Vision, Principles and Design Guidelines; Principle 7: New development within the Colony respects the historic context, which provides design guidance for new construction within the Anaheim Colony Historic District.

Principle 7: New Development within the Colony Respects the Historic Context.

The portion of the historic district where the proposed project site is located has a varied history of development types with agricultural, industrial, and residential developments that span multiple decades. Southeast of the project site, the large residential development located at the corner of East Santa Ana Street and South Olive Street previously functioned as a single-family residence and orchard in the 1930s. By the early 1950s, the orchard was replaced with several industrial buildings. In 2010, all of the industrial buildings were demolished, and the current large scale residential development was constructed.

The remaining buildings surrounding the subject property all functioned as industrial properties starting in the 1930s. However, starting in the 1980s through the mid-2010s, these original industrial buildings were demolished and replaced with modern buildings with a variety of functions including commercial, industrial, residential, and civic buildings. Thereby creating a section of the historic district that has no thematic or architectural cohesion. The area has been heavily modified since the 1980s such that the historic setting is no longer recognizable, and there is no potential for the proposed project to impact an existing historic setting/context.

Architectural Heritage

Based on a review of the surrounding residential areas north of the subject property and throughout the historic district, there are multiple examples of early twentieth century architectural styles. Architectural styles in the adjacent residential neighborhood include Craftsman, Queen Anne Cottage, Minimal Traditional, and Ranch.

However, because of the lack of lack of architectural cohesion and sporadic development along East Santa Ana Street, the proposed development would provide an opportunity to utilize a fresh aesthetic and change of use for the property. The proposed project would utilize modern materials such as composition shingle, stucco, vinyl, and brick veneer to avoid conjecture with the historic architectural resources of the existing neighborhood.

Scale, Massing, and Height

The proposed new construction would not introduce incompatible massing and scale, as the project site has historically been occupied by larger buildings with limited views of the residential area to the north. Therefore, the proposed new construction would comply with Principle 7 as there would be no significant changes to the original scale of the historic district.

Streetscape and Landscape

The proposed project would preserve existing trees along Santa Ana Street and would preserve the orientation of the site with two distinct parcels that are separated by Philadelphia Street. The proposed project would also incorporate new landscaping features such as large trees and open courtyards to blend into and enhance the surroundings.

Conclusions

The results from the Historic Built Environment Assessment determined that the properties located at 275-375 East Santa Ana Street were found not eligible under all State and local designation criteria due to a lack of significant historical associations and architectural merit and therefore, it is not considered a historical resource under CEQA (Appendix C.4). Additionally, the proposed project's new construction would not adversely impact the Anaheim Colony Historic District or the City's historic district design. Therefore, the proposed project would result in a less than significant impact to historical resources under CEQA. No mitigation measures are recommended.

Cultural Resources

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?

Less than significant impact with mitigation incorporated. CEQA Guidelines Section 15064.5 defines "historical resources" as resources listed in the CRHR, a local register, determined significant by the lead agency, or determined to be eligible by the California Historical Resources Commission for listing in the CRHR. The criteria for eligibility are generally set by the National Historic Preservation Act of 1966, which established the NRHP, and which recognizes properties that are significant at the federal, State, and local levels. To be eligible for listing in the NRHP and CRHR, a district, site, building, structure, or object must possess integrity of location, design, setting, materials, workmanship, feeling, and association relative to American history, architecture, archaeology, engineering, or culture. In addition, unless the property possesses exceptional significance, it must be at least 50 years old to be eligible.

The results of the SCCIC records search indicate that there are 17 historic resources within the 0.5-mile radius of the project site, none of which are located within the project boundaries. The pedestrian survey identified three potentially historic structures The results from the Historic Built Environment Assessment determined that the properties located at 275-375 East Santa Ana Street were found not eligible under all State and local designation criteria due to a lack of significant historical associations and architectural merit and therefore, it is not considered a historical resource under CEQA.

No other potential resources were identified during the pedestrian survey; however, It Is possible that earthmoving activities associated with project construction could encounter previously undiscovered historical resources. Historical resources can include but are not limited to stone, bone, or wood artifacts or features, or sites including privies, standing structures, or fences. Damage or destruction of these resources would be a potentially significant impact; thus, implementation of Mitigation Measure (MM) CUL-1 would establish a procedure for handling historical resources that may be discovered prior to and during project construction. With implementation of MM CUL-1, impacts associated with historical resources would be less than significant with mitigation incorporated.

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

Less than significant impact with mitigation incorporated. Section 15064.5 of the CEQA Guidelines defines significant archaeological resources as resources that meet the criteria for historical resources, as discussed above, or resources that constitute unique archaeological resources. A project-related significant adverse effect could occur if a project were to affect archaeological resources that fall under either of these categories.

The records search conducted at the SCCIC for the project site and its 0.5-mile surrounding radius, identifies 17 historic resources, none of which are prehistoric. In addition, the results of the pedestrian survey did not locate or identify any prehistoric resources. Nevertheless, it is possible that earthmoving activities associated with project construction could encounter previously undiscovered archaeological resources. Archaeological resources can include but are not limited to stone, bone, wood, or shell artifacts or features, including hearths and structural elements. Damage or destruction of these resources would be a potentially significant impact. Implementation of MM CUL-1 would ensure that this potential impact is reduced to a less than significant level.

c) Disturb any human remains, including those interred outside of formal cemeteries?

Less than significant impact with mitigation incorporated. No human remains or cemeteries are known to exist within or near the project site. Although human remains within the project site are unlikely, there is always the possibility that earthmoving activities associated with project construction could potentially damage or destroy previously undiscovered human remains.

In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5, Health and Safety Code Section 7050.5, and Public Resources Code Sections 5097.94 and 5097.98 must be followed. Consistent with established law, once project-related earthmoving begins and if there is inadvertent discovery or recognition of any human remains, compliance with Public Resources Code Section 5097.98 would be required. Public Resources Code Section 5097.98 identified the procedure that must be followed in the event of an accidental discovery of human remains and determination of the remains to be Native American. Compliance with these procedures, as required by statute, and implementation of MM CUL-2, in addition to MM TCR-1 and MM TCR-2, would reduce potential impacts related to human remains to a less than significant level.

Tribal Cultural Resources

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

d) 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

Less than significant impact with mitigation incorporated. The records search conducted at the SCCIC, which included a search of the CRHR, did not identify any listed or eligible TCRs that would be adversely affected by the proposed project. Additionally, the NAHC SLF search produced a negative result for TCRs in the project vicinity. The pedestrian survey conducted by FCS on January 25, 2024, similarly, did not identify any TCRs. However, should any undiscovered TCRs be encountered during project construction, implementation of MM CUL-1 and MM CUL-2, in addition to MM TCR-1 and MM TCR-2, would reduce potential impacts to a less than significant level.

e) 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 I of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision I of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

Less than significant impact with mitigation incorporated.

FCS assisted the City in Tribal Consultation efforts, pursuant to AB-52 and SB-18. The NAHC provided a list of 25 Tribal representatives available for AB 52 consultation. Letters containing information regarding the proposed project were sent to the Tribal representative, in compliance with AB 52 and SB-18. A reply from Gabrieleño Band of Mission Indians – Kizh Nation was received on March 27, 2024, providing Kizh Nation TCR mitigation measures.

To reduce potential impacts, should any undiscovered TCRs be encountered during project construction, implementation of MM CUL-1 and MM CUL-2, in addition to MM TCR-1 and MM TCR-2, would reduce potential impacts to a less than significant level.

Mitigation Measures

MM CUL-1 Prior to the issuance of a grading permit, the project applicant/lead agency shall retain an Archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology. The project Archaeologist shall conduct a Worker Environmental Awareness Program (WEAP) training for archaeological resources to be given to all construction personnel directly involved with project-related ground disturbance. The training should include visual aids, a discussion of applicable laws and statutes relating to archaeological resources, types of resources that may found within the project site, and procedures to be followed in the event such resources are encountered. Additionally, a copy of sign-in sheets for the WEAP training shall be provided by the construction manager or project proponent to the City of Anaheim Planning staff prior to issuance of grading permits. In the event exposed soil indicates cultural materials may be present, this may be followed by regular or periodic archaeological monitoring as determined by the Archaeologist, but full-time archaeological monitoring is not required at this time.

It is always possible that ground-disturbing activities during construction may uncover previously unknown, buried cultural resources. In the event that buried cultural resources are discovered during construction, operations shall stop within a 100-foot radius of the find and a qualified Archaeologist shall be consulted to determine whether the resource requires further study. The qualified Archaeologist shall make recommendations to the Lead Agency on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the California Environmental Quality Act (CEQA) Guidelines. Potentially significant cultural resources consist of but are not limited to stone, bone, fossils, wood, or shell artifacts or features, including hearths, structural remains, or historic dumpsites. Any previously undiscovered resources found during construction within the project area should be recorded on appropriate California Department of Parks and Recreation (DPR) forms and evaluated for significance in terms of CEQA criteria.

If the resources are determined to be unique historic resources as defined under Section 15064.5 of the CEQA Guidelines, mitigation measures shall be identified by the Archaeological Monitor and recommended to the Lead Agency. 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 finds.

No further grading shall occur in the area of discovery until the Lead Agency approves the measures to protect these resources. Any archaeological artifacts recovered as a result of mitigation shall be donated to a qualified scientific institution approved by the lead agency where they would be afforded long-term preservation to allow future scientific study.

MM CUL-2 **Accidental Discovery of Human Remains.** In the event of the accidental discovery or recognition of any human remains, California Environmental Quality Act (CEQA) Guidelines Section 15064.5; Health and Safety Code Section 7050.5; Public Resources Code Section 5097.94 and Section 5097.98 must be followed. If during the course of project development there is accidental discovery or recognition of any human remains, the following steps shall be taken:

1. There shall be no further excavation or disturbance within 100 feet of the remains until the County Coroner is contacted to determine whether the remains are Native American and if an investigation of the cause of death is required. If the Coroner determines the remains to be Native American, the Coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours, and the NAHC shall identify the person or persons it believes to be the Most Likely Descendant (MLD) of the deceased Native American. The MLD may make recommendations to the landowner or the person responsible for the excavation work within 48 hours, for appropriate treatment and disposition of, with

appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98.

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:
   - The NAHC is unable to identify a MLD or the MLD failed to make a recommendation within 48 hours after being notified by the commission.
   - The descendant identified fails to make a recommendation.
   - The landowner or his authorized representative rejects the recommendation of the descendant, and mediation by the NAHC fails to provide measures acceptable to the landowner.

Additionally, California Public Resources Code Section 15064.5 requires the following relative to Native American Remains:

When an initial study identifies the existence of, or the probable likelihood of, Native American Remains within a project site, a lead agency shall work with the appropriate Native Americans as identified by the NAHC as provided in Public Resources Code Section 5097.98. The applicant may develop a plan for treating or disposing of, with appropriate dignity, the human remains and any items associated with Native American Burials with the appropriate Native Americans as identified by the NAHC.

Gabrieleño Band of Mission Indians–Kizh Nation–Proposed TCR Mitigation Measures

MM TCR-1 Retain a Native American Monitor Prior to Commencement of Ground-disturbing Activities

a. The project applicant/lead agency shall retain a Native American Monitor from the consulting Tribe(s). The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.
b. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.
c. The monitor shall complete daily monitoring logs that shall provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related

materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs shall identify and describe any discovered Tribal Cultural Resources (TCRs), including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, Tribal Cultural Resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs shall be provided to the project applicant/lead agency upon written request to the Tribe.

d. On-site Tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.
e. The Owner/Developer shall provide the following note on all grading plans:
    - This project requires the applicant to contract with a Native American Monitor to be available to evaluate any Tribal and cultural resources unearthed during excavation and grading activities. Contractor shall maintain direct contact information for City-approved Monitor and make available to Public Works Inspector at pre-construction meeting.
    - Contractor will be responsible to copy Public Works Inspector on correspondence to third-party monitor to schedule monitoring.
    - In the event that Tribal and cultural resources are inadvertently unearthed during excavation and grading activities, the Contractor shall immediately cease all earth-disturbing activities within a 100-foot radius of the area of discovery until such time that avoidance or salvage operations are concluded under the direction of the Paleontologist.
    - A final summary prepared by the monitor that identifies any materials found and noting that monitoring activities have been concluded must be provided to the Public Works Inspector, prior to pad certification/building permit issuance (when no pad certification).

MM TCR-2 Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)

a. Upon discovery of any Tribal Cultural Resources (TCRs), all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh Tribal Monitor and/or Kizh Archaeologist. The Kizh shall recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

MM TCR-3 Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects

a. Native American human remains are defined in Public Resources Code 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.
b. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.
c. Human remains and grave/burial goods shall be treated alike per California Public Resources Code Section 5097.98(d)(1) and (2).
d. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human and/or burial remains.
e. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.6 Energy *Would the project:*				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Environmental Evaluation

Setting

Energy use, especially through fossil fuel consumption and combustion, relates directly to environmental quality since it can adversely affect air quality and generate greenhouse gas (GHG) emissions that contribute to climate change. Electrical power is generated through a variety of sources, including fossil fuel combustion, hydropower, wind, solar, biofuels, and others. Natural gas is widely used to heat buildings, prepare food in restaurants and residences, and fuel vehicles, among other uses. Fuel use for transportation is related to the fuel efficiency of cars, trucks, and public transportation; choice of different travel modes such as auto, carpool, and public transit; and miles traveled by these modes and is generally based on petroleum-based fuels such as diesel and gasoline. Electric vehicles (EVs) may not have any direct emissions but do have indirect emissions via the source of electricity generated to power the vehicle. Construction and routine operation and maintenance of transportation infrastructure also consume energy.

Anaheim Public Utilities provides electricity and water services to the City. In 2022, the City of Anaheim Public Utilities provided 2,221.9 gigawatt-hours (GWh) per year of electricity to the City.[29] Since the project applicant has committed to an all-electric development, which means that no natural gas service will be provided to the proposed townhomes and operation of the proposed project would not consume any natural gas.

Petroleum-based fuels currently account for a majority of California's transportation energy sources and primarily consist of diesel and gasoline types of fuels. However, the State has been working on developing strategies to reduce petroleum use. Over the last decade California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHG emissions from the transportation sector, and

[29] California Energy Commission. 2016. Electricity Consumption by Entity. Website: https://www.ecdms.energy.ca.gov/elecbyutil.aspx. Accessed April 4, 2024.

reduce VMT. Accordingly, petroleum-based fuel consumption in California has declined. In 2022, 1,761 million gallons of gasoline and 51 million gallons of diesel was sold in Orange County.[30]

City of Anaheim Municipal Greenhouse Gas Reduction Plan

The City of Anaheim's "Greenhouse Gas Reduction Plan: Sustainable Electric & Water Initiatives" (GHG Reduction Plan), published in 2020, identifies reduction targets for years 2020 and 2030 to be achieved by the Anaheim Public Utilities Department (APU). To meet the emissions targets, the GHG Reduction Plan also identifies renewables portfolio targets of increasing the APU power supply generated from renewable sources up to 33 percent by year 2020 and 40 to 50 percent by year 2030. The GHG Reduction Plan also establishes transportation-related goals for APU to convert its fleet vehicles to consist of 10 percent low to zero emissions vehicles by year 2020 and up to 20 percent by year 2030. This GHG Reduction Plan has no direct applicability to the proposed project because it applies only to municipal activities and not individual development projects; however, the proposed project's GHG emissions would benefit from the GHG Reduction Plan's increased renewables targets because the proposed project would be served by APU.

City of Anaheim Sustainability Programs

- Anaheim Public Utilities Incentive Programs: The program encompasses more than 45 rebates and incentive programs offered to businesses and residents in the City of Anaheim to assist them in water and energy savings.
- Electric Vehicle Charging: The City of Anaheim developed a streamlined process to promote use of EVs in addition to creation of a rebate program for installation of EV chargers. The City currently offers rebate programs of private and public use EV chargers.
- Green Building Program/Incentives: This program provides rebates for buildings certified as a green building by the U.S. Green Building Council, California Green Build, Build It Green, or other rating programs.
- Residential Rooftop Solar Systems: The City developed a streamlined permitting process for small residential rooftop solar energy systems.

Would the project:

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

Less than significant impact. A discussion of the proposed project's anticipated energy usage is presented below. Energy use consumed by the proposed project was estimated and includes natural gas, electricity, and fuel consumption for project construction and operation. Energy calculations are included as part of Appendix A.

[30] California Energy Commission (CEC). 2024. 2022 California Annual Retail Fuel Outlet Report Results. Website: https://www.energy.ca.gov/media/3874. Accessed April 18, 2024.

Construction Impacts

Construction of the proposed project would require demolition, site preparation, grading, building construction, architectural coating, and paving. Construction activities would require energy for the manufacture and transportation of building materials, preparation of the site (e.g., demolition, site clearing, and grading), and the actual construction of the building. Petroleum-based fuels such as diesel fuel and gasoline would be the primary sources of energy for these tasks.

The off-road construction equipment diesel fuel usage was calculated through use of the off-road equipment assumptions provided in the CalEEMod output files (see Appendix A) and ARB's off-road equipment fuel use assumptions.[31] The off-road equipment diesel fuel calculations are shown in Appendix A, which found that off-road equipment would consume 26,220 gallons of diesel fuel.

Fuel use associated with construction vehicle trips generated by the proposed project was also estimated; trips include construction worker trips, haul truck trips for material transport, and vendor trips for construction material deliveries. Fuel use from these vehicles traveling to the project site was based on (1) the projected number of trips the proposed project would generate during construction (obtained from the CalEEMod output file in Appendix A), (2) average trip distances by trip type, and (3) average miles per gallon rates estimated in the ARB Emission Factors (EMFAC) mobile source emission model (see Appendix A), which found on-road construction-related vehicle trips would consume 6,529 gallons of gasoline and 6,034 gallons of diesel fuel during construction of the proposed project.

Construction activities associated with the proposed project would be required to adhere to all State and SCAQMD regulations for off-road equipment and on-road trucks, which provide minimum fuel efficiency standards. As such, construction activities for the proposed project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources. Impacts regarding transportation energy would be less than significant.

During construction the proposed project would consume electricity to construct the new structures and infrastructure. Electricity would be supplied to the project site by Anaheim Public Utilities and would be obtained from the existing electrical lines in the vicinity of the project site. The use of electricity from existing power lines rather than temporary diesel or gasoline powered generators would minimize impacts on energy use. Electricity consumed during project construction would vary throughout the construction period based on the construction activities being performed. Various construction activities include electricity associated with the conveyance of water that would be used during project construction for dust control (supply and conveyance) and electricity to power any necessary lighting during construction, electronic equipment, or other construction activities necessitating electrical power. Such electricity demand would be temporary, nominal, and would cease upon the completion of construction. Overall, construction activities associated with the proposed project would require limited electricity consumption that would not be expected to have an adverse impact on available electricity supplies and infrastructure. Therefore, the use of electricity during project construction would not be wasteful, inefficient, or unnecessary.

[31] California Air Resources Board (ARB). 2017. 2017 Off-Road Diesel Emission Factors Spreadsheet.

Operational Impacts

The ongoing operation of the proposed project would require the use of energy resources for multiple purposes including, but not limited to, heating/ventilating/air conditioning (HVAC), refrigeration, lighting, appliances, and electronics. Energy would also be consumed during operations related to water usage, solid waste disposal, landscape equipment and vehicle trips. The project applicant has committed to an all-electric development and no natural gas hookups will be provided to the proposed project. As such, no natural gas will be consumed from operation of the proposed project and operational energy use will be limited to electricity and petroleum fuel consumption.

Operations-related Electricity Consumption

Operation of the proposed project would result in net zero electricity usage with implementation of Title 24 Part 6 requirements that require the implementation of building energy efficiency standards that include a variety of measures to make new homes more energy-efficient and also requires the installation of photovoltaic (PV) systems of adequate size to generate enough electricity to meet the zero-net energy use standard. The size of the PV system required for the project pursuant to the 2022 Title 24 standards was calculated, which found that the proposed project would need to install at least 215 Kilowatts of PV panels within the proposed project.

Therefore, it is anticipated the proposed project will be designed and built to minimize electricity use and that existing and planned electricity capacity and electricity supplies would be sufficient to support the proposed project's electricity demand. Thus, impacts with regard to electrical supply and infrastructure capacity would be less than significant and no mitigation measures would be required.

Operations-related Vehicular Petroleum Fuel Usage

Operation of the proposed project would result in increased consumption of petroleum-based fuels related to vehicular travel to and from the project site. As detailed in the CalEEMod output files (see Appendix A), the proposed project would generate 1,151,868 VMT per year. As shown in the EMFAC2021 output files (see Appendix A), the automobile fleet average miles per gallon rate for Orange County is 26.7 miles per gallon, which would result in the consumption of 43,116 gallons of gasoline per year. This equates to 0.0037 percent of the gasoline consumed in Orange County annually. As such, the operations-related petroleum use would be nominal, when compared to current petroleum usage rates.

It should be noted that, the proposed project would comply with all federal, State, and City requirements related to the consumption of transportation energy that includes California Code of Regulations Title 24, Part 10 California Green Building Standards that require all new garages for the proposed homes to install electrical panels of adequate size to support the installation of electric vehicle charging systems. Therefore, it is anticipated the proposed project will be designed and built to minimize transportation energy through the promotion of the use of electric-powered vehicles and it is anticipated that existing and planned capacity and supplies of transportation fuels would be sufficient to support the proposed project's demand. Thus, impacts related to transportation energy

supply and infrastructure capacity would be less than significant and no mitigation measures would be required.

In conclusion, the proposed project would comply with regulatory compliance measures outlined by the State and City related to Air Quality, GHG emissions, Transportation/Circulation, and Water Supply. Additionally, the proposed project would be constructed in accordance with all applicable City Building and Fire Codes. Therefore, the proposed project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. Impacts would be less than significant.

b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Less than significant impact. California's Renewables Portfolio Standard (RPS) required that 33 percent of electricity retail sales be served by renewable energy sources by 2020. The proposed project would be served with electricity provided by Anaheim Public Utilities. In 2020, Anaheim Public Utilities' power mix included 32.3 percent eligible renewable (biomass and biowaste, geothermal, eligible hydroelectric, solar, and wind), 46 percent coal, 19.9 percent natural gas, and 1.8 percent large hydroelectric.[32]

The proposed project would be served with gas provided by Southern California Gas Company (SoCalGas). SoCalGas offers renewable natural gas captured from sources like dairies, wastewater treatment plants and landfills.[33] The City's General Plan sets forth a section of "Energy Conservation: Green Power and Saving Electricity" within the "Green Element" Chapter and will be referenced herein to determine project consistency with the applicable energy efficiency or renewable energy policy or plan. Goals 9, 10, 11, 12 of the General Plan's Green Element and their underlying policies aim to reduce single-occupancy vehicle trips and promote clean air vehicles, mass transit, and alternative transportation modes such as bicycling and walking, which altogether reduces fuel-based energy consumption.

Southern California Association of Governments (SCAG's) Connect SoCal Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) establishes GHG emission reduction goals for automobiles and light-duty trucks for 2020 and 2045 as well as an overall GHG target for the project region consistent with both the post-2020 GHG reduction goals of Executive Order 5-03-05 and B-30-15. The proposed project is within a few miles of several large job centers and High Quality Transit Areas (HQTAs) in Orange County. Considering the proposed project's location within an HQTA, the proposed project is consistent with regional strategies to reduce passenger VMT and transportation fuel consumption as well as Goals 9 through 12 of the General Plan's Green Element.

Also contained in the General Plan's Green Element, Goal 15.2 encourages site design practices that reduce and conserve energy. Goal 15.2 includes policies that encourage increased use of passive and

[32] California Energy Commission (CEC). 2020 Power Content Label. Website: https://www.energy.ca.gov/programs-and-topics/programs/power-source-disclosure/power-content-label/annual-power-content-1. Accessed August 5, 2024.

[33] Southern California Gas Company (SoCalGas). Renewable Gas. Website: https://www.socalgas.com/sustainability/renewable-gas. Accessed August 5, 2024

active solar design in existing and new development, encourage energy-efficient retrofitting of existing buildings throughout the City, and continue to provide free energy audits for the public.

All land use development in the City is required to comply with the City's Municipal Code, which contains rules and regulations regarding energy efficiency. Chapter 10.10 of the Municipal Code encourages the redirection of recyclable materials generated during construction away from landfills. Chapter 10.18 includes regulations to support water conservation. Chapter 15.03 adopts the 2019 California Energy Code and Green Building Standards. Chapter 15.04 includes the Solar Energy regulations and Section 15.04.060 promotes a streamlined permitting process for small residential rooftop solar energy systems. As the proposed project would be compliant with these codes and regulations, it would be consistent with the General Plan's Green Element Goal 15.2 to encourage energy-efficient design.

Goal 16.1 aims to continue to monitor and improve the Anaheim Recycle program that would reduce solid waste from households, businesses, commercial areas and construction activities. This goal would apply to the City's waste collection service provider, which is required to provide recycling and organic waste collection services compliant with AB 341—which required the State to recycling, reduce, or compost no less than 75 of solid waste collected in 2020—and Senate Bill (SB) 1383—which requires local waste collection agencies to provide organic waste collection services.

Finally, as previously discussed in Section 2.6, the City has a series of sustainability programs, which are relisted below.

- Anaheim Public Utilities Incentive Programs: The program encompasses more than 45 rebates and incentive programs offered to businesses and residents in the City of Anaheim to assist them in water and energy savings.
- Electric Vehicle Charging: The City of Anaheim developed a streamlined process to promote use of EVs in addition to creation of a rebate program for installation of EV chargers. The City currently offers rebate programs of private and public use EV chargers.
- Green Building Program/Incentives: This program provides rebates for buildings certified as a green building by the U.S. Green Building Council, California Green Build, Build It Green, or other rating programs.
- Residential Rooftop Solar Systems: The City developed a streamlined permitting process for small residential rooftop solar energy systems.

The proposed project would neither conflict with nor obstruct the implementation of these sustainability programs. These programs are primarily established by the City to facilitate the use of energy-efficient technologies and designs in existing development through rebate programs and streamlined permitting processes. They would not place any requirement on the proposed project and would be available to be utilized by future occupants of the proposed project. Therefore, the proposed project would be consistent with the City's overall sustainability efforts.

Therefore, compliance with the General Plan policies and programs, and adherence to the development standards in the Municipal Code would ensure that the proposed project would not conflict with or obstruct State or local plans for renewable energy or energy efficiency. Therefore, the proposed project would have a less than significant impact under this criterion.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.7 Geology and Soils *Would the project:*				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☒	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☒	☐	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☒	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Environmental Evaluation

Setting

Geology and Soils

The analysis in this section is based, in part, on the Geotechnical Due Diligence Review prepared by SA Geotechnical, Inc. (SA GEO) on May 10, 2023, and Addendum on September 29, 2023, included in Appendix D of this document. The Geotechnical Due Diligence Review included a review of collected

geologic, geotechnical engineering and seismological reports and maps pertinent to the project site; a site-specific subsurface exploration; laboratory testing; and geotechnical analysis. The report concluded that the proposed grading and development is considered geotechnically feasible provided the recommendations in the report, included in MM GEO-1, are implemented during design, grading, and construction.

Paleontological Resources

Paleontological resources are the fossilized remains of plants and animals, including vertebrates (animals with backbones; fish, amphibians, reptiles, birds, mammals, etc.), invertebrates (animals without backbones; starfish, clams, coral, cephalopods, etc.), microscopic plants and animals (microfossils), and trace fossils/ichnofossils (i.e., footprints, burrows, etc.). Fossils are valuable, nonrenewable, scientific resources used to document the existence of extinct life forms and to reconstruct the environments in which they lived. Fossils are preserved in sedimentary rocks and, despite the abundance of these rocks and the vast numbers of organisms that have lived through time, preservation of plant or animal remains as fossils is a rare occurrence.

The Society of Vertebrate Paleontology (SVP) defines a significant fossil resource as, "identifiable vertebrate fossils, large or small, uncommon invertebrate, plant, and trace fossils, and other data that provide taphonomic, taxonomic, phylogenetic, paleoecologic, stratigraphic, and/or biochronologic information." Paleontological resources are considered older than recorded human history and/or older than middle Holocene (i.e., older than about 5,000 radiocarbon years).[34]

The SVP has indicated that geologic units of high paleontological potential are those from which vertebrate or significant invertebrate or plant fossils have been recovered in the past (i.e., are represented in institutional collections). Geologic units of low paleontological potential are those that are not known to have produced a substantial body of significant paleontological material. Accordingly, the sensitivity of an area with respect to paleontological resources hinges on its geologic setting and whether significant fossils have been discovered in the area or in similar geologic units.

Geologic mapping indicates that the project site is within Holocene- to late Pleistocene-age alluvial deposits (Qyf).[35] These deposits are described as unconsolidated to moderately consolidated silt, sand, and coarse-grained sand to cobble alluvium, and are part of an alluvial fan complex emanating from the southern flanks of the San Gabriel and San Bernardino mountains; these alluvial fan deposits form rings around most of the San Bernardino basin.[36] The Geotechnical Due Diligence Review and Subsurface Exploration verifies what is indicated by geologic mapping; the alluvium encountered in borings at the project site consisted of silty/clayey sand and fine- to coarse-grained sands. These deposits were encountered—in varying compositions—to a depth of 51.5 feet below

[34] Society of Vertebrate Paleontology (SVP). 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. Society of Vertebrate Paleontology Impact Mitigation Guidelines Revision Committee.
[35] Morton, D.M., and F.K. Miller. 2006. Geologic map of the San Bernardino and Santa Ana 30' x 60' quadrangles, California. United States Geological Survey. Open-File Report OF-2006-1217. Map. Scale 1:100,000.
[36] Ibid.

ground surface (bgs), where the borings were terminated. Undocumented fill was encountered in a boring at the western portion of the project site, to a depth of 2.5 feet bgs.[37]

According to the San Diego Natural History Museum (The Nat) online fossil locality database and the Natural History Museum of Los Angeles County (NHM) collections (which are available online through the Integrated Digitized Biocollections [iDigBio]), there are no recorded fossil localities within the project site.[38,39] There are recorded four vertebrate fossil localities (5907, 5909, and 5910) approximately 2.2 miles southeast of the project site; 23 individual vertebrate specimens were recovered from late Pleistocene-age deposits at these localities.[40]

A NHM records search was conducted in December 2020 for a project approximately 0.75 mile west of the project site. The records search revealed five vertebrate fossil localities from Pleistocene-age alluvium in Orange County; as confirmed through the iDigBio database, these localities are not within the project site. All of the specimens recovered were a minimum of 5 feet deep in deposits mapped as late Pleistocene at the surface; in areas mapped as Holocene produced fossils starting at 11 feet bgs.[41]

A review of the University of California Museum of Paleontology (UCMP) online fossil locality database revealed 449 individual localities from Holocene-age deposits within Orange County; the fossils from these localities are all invertebrate fossils.[42] Additionally, the UCMP database contains 121 localities from various (mostly unnamed) Pleistocene-age deposits within Orange County, including vertebrate, invertebrate, and microfossils.[43]

There are several Pleistocene-age localities are also reported by George T. Jefferson in A Catalogue of Late Quaternary Vertebrates from California from Orange County; however, none of them are listed as being in proximity to the project site. There is one locality (LACM 1652) recovered from Holocene-age deposits near Rio Vista Avenue and Lincoln Avenue in Anaheim. [44,45] This specimen was determined to be modern remains and is not considered a paleontological resource.[46]

In general, Holocene-age sedimentary deposits are considered to have a low potential to contain significant paleontological resources, this conclusion is supported by the lack of Holocene-age fossils

[37] SA Geotechnical, Inc. (SA GEO). 2023. Geotechnical Due Diligence Review, Subsurface Exploration and Preliminary Design, Proposed Residential Development, 275 and 375 East Santa Ana Street, City of Anaheim, California. Project Number 23048-01. May 10, 2023.

[38] Integrated Digitized Biocollections (iDigBio). 2024. Online records search tool. National Science Foundation. Website: https://www.idigbio.org/portal/search. Accessed on August 5, 2024.

[39] San Diego Natural History Museum (The Nat). 2024. Paleontology Collection Database Results, Pleistocene-age vertebrate localities in Anaheim, CA

[40] San Diego Natural History Museum (The Nat). 2024. Paleontology Collection Database Results, Pleistocene-age vertebrate localities in Anaheim, CA.

[41] Cogstone. 2021. Cultural and Paleontological Resources Assessment for the Lincoln Colony Apartment Project, City of Anaheim, Orange County, California. Cogstone Project Number: 5164. March 2021.

[42] University of California Museum of Paleontology (UCMP). 2023. UC Museum of Paleontology Localities, localities from Holocene-age deposits within Orange County. Website: https://ucmpdb.berkeley.edu/loc.html. Accessed on August 5, 2024.

[43] University of California Museum of Paleontology (UCMP). 2023. UC Museum of Paleontology Localities, localities from Pleistocene-age deposits within Orange County. Website: https://ucmpdb.berkeley.edu/loc.html. Accessed on August 5, 2024

[44] Jefferson, George T. 1991. A Catalogue of Late Quaternary Vertebrates from California: Part One, Nonmarine Lower Vertebrate and Avian Taxa. Natural History Museum of Los Angeles County Technical Reports 5:1-51.

[45] Jefferson, George T. 1991. A Catalogue of Late Quaternary Vertebrates from California: Part Two, Mammals. Natural History Museum of Los Angeles County Technical Reports 7:1-129.

[46] Cogstone. 2021. Cultural and Paleontological Resources Assessment for the Lincoln Colony Apartment Project, City of Anaheim, Orange County, California. Cogstone Project Number: 5164. March 2021.

in the area. Therefore, deposits shallower than 5 feet bgs are considered to have a low potential to contain significant paleontological resources. Pleistocene-age deposits are generally considered to have a high potential to contain significant paleontological resources. Given the Pleistocene-age vertebrate fossil localities recorded in the area, the Pleistocene-age deposits in the area are considered to have a high potential to contain significant paleontological resources. Given that the previous fossil discoveries have all been deeper than 5 feet bgs, deposits mapped as Pleistocene-age that are deeper than 5 feet bgs are considered to have a high potential to contain significant paleontological resources.

Would the project:

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

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less than significant impact. The project site is located in Southern California, which is a seismically active area. The type and magnitude of seismic hazards affecting the project site are dependent on the distance to the causative fault and the intensity and magnitude of the seismic event. The seismic hazards may be primary, such as surface rupture and/or ground shaking, or secondary, such as liquefaction and/or ground lurching.

Active faults are not known to exist within the project site. According to the Geotechnical Due Diligence Review, the project site is not within a California State designated earthquake fault zone, and the potential for primary ground rupture is considered very low. Furthermore, according to the most recent Alquist-Priolo Earthquake Fault Zone and Seismic Hazard Zone Map, a known earthquake fault is not located near the project site or known to traverse the project site.[47] Therefore, impacts related to rupture of a known earthquake fault would be less than significant**.**

ii) Strong seismic ground shaking?

Less than significant impact with mitigation incorporated. The City, as well as most of Southern California, is located in a region of historic seismic activity. According to the Geotechnical Due Diligence Review, the closest active fault to the site is Richfield Fault located 4 miles northeast. Additionally, according to the California Geologic Survey earthquake zone map, the nearest zoned fault is the Peralta Hills Structure located 1.61 miles northeast of the project site. Other nearby faults include Lower Elysian Park thrust located 2.82 miles northwest of the project site, and the Puente Hills blind thrust system, located approximately 2.9 miles north of the project site.[48] During seismic events, the project site could experience moderate ground shaking associated with the faults

[47] California Geologic Survey. 2022. Earthquake Zones of Required Investigation Map. Website: https://maps.conservation.ca.gov/cgs/EQZApp/app/. Accessed August 5, 2024.

[48] United States Geologic Survey (USGS). 2022. U.S. Quaternary Faults Map. Website: https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=5a6038b3a1684561a9b0aadf88412fcf. Accessed August 5, 2024.

described above. Strong levels of seismic ground shaking can cause damage to buildings. The intensity of ground shaking on the project site would depend upon the earthquake's magnitude, distance to the epicenter, and geology of the area between the project site and epicenter. The proposed project would be subject to the current CBC, as adopted by the City's Planning and Building Department, with respect to seismic design parameters. Conformance with these standard engineering practices and design criteria would reduce the effects of seismic ground shaking.

The Geotechnical Due Diligence Review noted that the proposed project has the potential for strong seismic shaking during an earthquake event. Section 3 of the Geotechnical Due Diligence Review makes site-specific recommendations concerning earthwork, grading, seismic design parameters, corrosivity, groundwater, and stormwater infiltration. The Geotechnical Due Diligence Review concluded that the proposed project would be feasible from a geotechnical standpoint, provided that the preliminary recommendations are implemented during design, grading, and construction. MM GEO-1 requires implementation of the recommendations provided in the Geotechnical Due Diligence Review, including seismic design parameters. Compliance with MM GEO-1 and applicable regulations would reduce potential impacts related to strong seismic ground shaking to a less than significant level.

Following compliance with standard engineering practices, the CBC, and the site-specific recommendations referenced in MM GEO-1, potential impacts concerning exposure of people or structures to potential adverse effects involving strong seismic ground shaking would be less than significant with mitigation incorporated.

iii) Seismic-related ground failure, including liquefaction?

No impact. Liquefaction is a phenomenon where earthquake-induced ground vibrations increase the pore pressure in saturated, granular soils until it is equal to the confining, overburden pressure. When this occurs, the soil can completely lose its shear strength and enter a liquefied state. For liquefaction to occur, a project site must be subject to three factors: underlying loose, course-grained (sandy) soils, a groundwater depth of approximately 25 feet, and a potential for seismic shaking from nearby large-magnitude earthquakes**.**

The project site Is not located In a Liquefaction Hazard Zone.[49] Additionally, the Geotechnical Due Diligence Review indicates that the project site is not located within a potential liquefaction zone, as defined by the State's Seismic Hazard Mapping. The Geotechnical Due Diligence Review states that based on the absence of groundwater in the uppermost 50 feet, liquefaction potential is considered very low to nil. Furthermore, the General Plan Indicates that the project site is not located within an area with liquefaction potential.[50] Therefore, the proposed project would not cause potential substantial adverse effects involving seismic-related ground failure, including liquefaction. There would be no impact.

[49] State of California. 2022. California Geologic Survey Seismic Hazards Program: Liquefaction Zones. Website: https://gis.data.ca.gov/datasets/b70a766a60ad4c0688babdd47497dbad_0/explore?location=33.819912%2C-117.901236%2C14.33. Accessed August 5, 2024.

[50] City of Anaheim. May 2004. Anaheim General Plan Figure S-3, Seismic and Geological Hazards. Website: https://www.anaheim.net/DocumentCenter/View/2039/I-Safety-Element-?bidId=. Accessed August 5, 2024.

iv) Landslides?

No impact. Landslides can occur if ground shaking and/or heavy rainfall disturb areas of steep slopes consisting of unstable soils. According to the General Plan, earthquake-induced landslides have the potential to occur in the City's Hill and Canyon Area. Generally, these types of failures consist of rock falls, landslides, and debris flows. Areas having the potential for earthquake-induced landslides generally occur in areas of previous landslide movement, or where topographic, geological, geotechnical, and subsurface water conditions indicate a potential for permanent ground displacements.[51] The project site is not located in the City's Hill and Canyon Area and is not mapped within an area with earthquake-induced potential.[52] Therefore, the proposed project would not result in impacts related to landslides. There would be no impact.

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

Less than significant impact with mitigation incorporated. The Geotechnical Due Diligence Review indicates that the project site is underlain by sandy silt, silty sand, and sandy native alluvium. Undocumented artificial fill was encountered in one boring. The Geotechnical Due Diligence Review noted the presence of undocumented fill material and weathered/unsuitable alluvium in the upper 5 feet below existing grades and determined that this material will need to be removed and replaced as compacted fill. The proposed project would be required to implement the site-specific recommendations referenced in MM GEO-1, which includes remedial grading consisting of removal of undocumented fill materials in their entirety and weathered/unsuitable alluvium.

During construction, the proposed project would be required to comply with erosion and siltation control measures outlined in Anaheim Municipal Code Chapter 17.04: Grading, Excavation, Fills, Watercourses. Anaheim Municipal Code Chapter 17.04 requires that excavations and fills that may affect drainage and watercourses be performed in accordance with good engineering practice, thereby reducing to a minimum the hazards and damage to public and private property. This would include measures such as sandbagging to reduce project site runoff or hold topsoil in place prior to final grading and construction. Additionally, the proposed project would be subject to compliance with the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009DWQ, and all subsequent amendments) (Construction General Permit); see Impact 2.10(a). The Construction General Permit requires development and implementation of a Storm Water Pollution Prevention Plan (SWPPP) and monitoring plan, which must include erosion-control and sediment-control Best Management Practices (BMPs) that would meet or exceed measures required by the Construction General Permit to control potential construction-related pollutants. Following compliance with the established regulatory framework including the Anaheim Municipal Code and Construction General Permit, and with implementation of MM GEO-1, potential impacts concerning soil erosion and loss of topsoil would be less than significant with mitigation incorporated.

[51] City of Anaheim. May 2004. Anaheim General Plan Safety Element. Website: https://www.anaheim.net/DocumentCenter/View/2039/I-Safety-Element-?bidId=. Accessed August 5, 2024.
[52] City of Anaheim. May 2004. Anaheim General Plan Figure S-3, Seismic and Geological Hazards. Website: https://www.anaheim.net/DocumentCenter/View/2039/I-Safety-Element-?bidId=. Accessed August 5,2024.

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 with mitigation incorporated. The project site would not be subject to seismically induced liquefaction. Subsidence occurs when the withdrawal of groundwater, oil, or natural gas vertically displaces a large portion of land. Soils that are particularly subject to subsidence include those with high silt or clay content. Sandy silt, silty sand, and sandy native alluvium, and undocumented artificial fill underlie the project site. The Geotechnical Due Diligence Review evaluated site conditions and identified the need for removal and recompaction of all undocumented fill materials and weathered or disturbed alluvium in order to provide competent subgrade and bearing conditions for the proposed structural slabs and foundations. Accordingly, the Geotechnical Due Diligence Review recommends disposal of unsuitable soils and fill materials generally to a depth of 5 feet, recompaction, and placement of additional engineered fill where appropriate**.**

Earthwork would be required to meet compaction standards, and import soils must be approved by a Geotechnical Consultant. Compliance with these recommendations would be required by implementation of MM GEO-1 and would reduce potential impacts to less than significant with mitigation incorporated.

Furthermore, the Anaheim Building Division would review construction plans to verify compliance with standard engineering practices, the Municipal Code, the CBC, and the site-specific recommendations contained in the Geotechnical Feasibility Report, as referenced in MM GEO-1. Following compliance with standard engineering practices, the established regulatory framework, and MM GEO-1, the proposed project would not be located on a geologic unit or soil that would become unstable. Therefore, with implementation of MM GEO-1, impacts would be less than significant with mitigation incorporated.

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?

Less than significant impact. The Geotechnical Due Diligence Review anticipated that the expansion potential would range from “very low” to “low.” Therefore, the proposed project would not be located on expansive soil. Additionally, the Anaheim Building Division would review construction plans to verify compliance with standard engineering practices, the Anaheim Municipal Code, and the CBC. Therefore, impacts would be less than significant.

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

No impact. Sewers are available for disposal of the proposed project’s wastewater. The proposed project would connect to the existing sanitary sewer system for wastewater disposal and would not include the use of septic tanks. Therefore, no impacts would occur, and no mitigation is required.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than significant with mitigation incorporated. Geologic mapping indicates that the project site is within Holocene- to late Pleistocene-age alluvial deposits. The Geotechnical Due Diligence Review and Subsurface Exploration indicates that alluvium encountered in borings at the project site consisted of silty/clayey sand and fine- to coarse-grained sands. These deposits were encountered—in varying compositions—to a depth of 51.5 feet bgs. Undocumented fill was encountered in a boring at the western portion of the project site, to a depth of 2.5 feet bgs.

As discussed above, shallow Holocene-age sedimentary deposits are considered to have a low potential to contain significant paleontological resources and Pleistocene-age sedimentary deposits are considered to have a high potential to contain significant paleontological resources. Based on records search results, there have been numerous vertebrate fossil discoveries from Pleistocene-age deposits in Orange County and within the City. As these fossils were recovered from deposits deeper than 5 feet bgs, the deposits shallower than 5 feet are considered to have a low potential to contain significant paleontological resources, and deposits deeper than 5 feet bgs are considered to have a high potential.

According to the Geotechnical Due Diligence Review and Subsurface Exploration, grading cuts and fill are anticipated to be relatively minor—on the order on 0 to 2 feet bgs. Additionally, removal and recompaction of soil within the upper 5 feet bgs would be required. As ground disturbance associated with the proposed project is not expected to extend past 5 feet bgs, the risk of impacting significant paleontological resources is low. While the chance of encountering fossils during construction activities is low, it cannot be completely disregarded. The potential still exists for an unanticipated fossil discovery during construction activities. If significant paleontological resources are encountered and inadvertently destroyed during construction, that would be a potentially significant impact.

To address the potential for an unanticipated discovery during construction, implementation of MM GEO-2 would be required. MM GEO-2 would require a worker training by a qualified Paleontologist, prior to the start of construction, to inform construction personnel of the potential to encounter fossils and procedures to follow in the event fossils are encountered during construction. Implementation of MM GEO-2 would reduce the potentially significant impact to less than significant. The impact would be less than significant with mitigation incorporated.

Mitigation Measures

MM GEO-1 Prior to the issuance of a grading permit, the Owner/Developer shall implement the recommendations provided in Section 3, Conclusion and Preliminary Recommendations, in the Geotechnical Due Diligence Review prepared by SA Geotechnical Inc. (SA GEO). These include general earthwork requirements for site preparation, soil removal, fill material, grading, foundation, design, and all relevant construction permits, as well as requirements related to structural design and

pavement design. The Geotechnical Feasibility Report, included in Appendix D, is incorporated herein by reference as fully set forth in this mitigation measure.

MM GEO-2 In the event that fossils or fossil-bearing deposits are discovered during construction, excavations within 50 feet of the find shall be temporarily halted or diverted. The contractor shall notify a qualified Paleontologist (meeting the standards of the Society of Vertebrate Paleontology [SVP]) to examine the discovery. The qualified Paleontologist shall document the discovery as needed in accordance with SVP standards, evaluate the potential resource, and assess the significance of the find under the criteria set forth in CEQA Guidelines Section 15064.5. Based on the significance of the find, the qualified Paleontologist shall determine procedures to be followed before construction is allowed to resume at the location of the find. If in consultation with the qualified Paleontologist, it is determined that avoidance is not feasible, the qualified Paleontologist shall prepare Paleontological Resources Impact Mitigation Program (PRIMP) to outline salvage and recovery procedures. If deemed necessary by the qualified Paleontologist, the PRIMP will include construction monitoring requirements as well. The PRIMP shall be submitted to the City for review and approval and the approved plan shall be implemented.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.8 Greenhouse Gas Emissions *Would the project:*				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Environmental Evaluation

Setting

The "greenhouse effect" is the natural process that retains heat in the troposphere, the bottom layer of the atmosphere. Without the greenhouse effect, thermal energy would "leak" into space resulting in a much colder and inhospitable planet. With the greenhouse effect, the global average temperature is approximately 61°F (degrees Fahrenheit) (16°C [degrees Celsius]). GHGs are the components of the atmosphere responsible for the greenhouse effect. The amount of heat retained is proportional to the concentration of GHGs in the atmosphere. As human activities and natural sources release more GHGs into the atmosphere, GHG concentrations increase and the atmosphere retains more heat, increasing the effects of climate change. The Kyoto Protocol identified six gases for emission reduction targets: carbon dioxide (CO_2), methane (CH_4), nitrogen oxide (N_2O), hydrofluorocarbon (HFC), perfluorocarbon (PFC), and sulfur hexafluoride (SF_6). When accounting for GHGs, all types of GHG emissions are expressed in terms of CO_2e and are typically quantified in metric tons (MT) or million metric tons (MMT).

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

Less than significant. The City of Anaheim adopted the Greenhouse Gas Reduction Plan *in* July 2015. The GHG Reduction Plan includes measures that must be implemented by new development in order to meet the State's 2030 GHG emission reduction target of 40 percent below 1990 baseline levels. Since the City's GHG Reduction Plan does not include any project-specific thresholds, the SCAQMD's proposed 3,000 $MTCO_2e$ per year screening threshold has been utilized as the significance threshold for the proposed project. The project's GHG emissions were calculated using the CalEEMod model (see Appendix A).

Construction GHG Emissions

As shown in Table 5, construction of the proposed project is estimated to generate an estimated 392 MT CO2e. As recommended by the SCAQMD, this total construction-related GHG emissions estimate

was amortized over an assumed 30-year lifetime of the proposed project (i.e., the total construction-related GHG emissions estimate was divided by 30 to determine an "annual" construction emissions estimate that can be added to the proposed project's annual operational emissions) to determine the proposed project's annual GHG emissions inventory. This results in an annual proposed project-related construction emission estimate of approximately 13 MT CO_2e.

Table 5: Construction-Related GHG Emissions from the Proposed Project

Construction Year	GHG Emissions (MT CO_2e per year)
2025	93
2026	299
Total Construction Emissions	**392**
Emissions Amortized Over 30 Years	**13**

Notes:
GHG = greenhouse gas
MT CO_2e = metric tons of carbon dioxide equivalents
Because of rounding, total MT CO2e may be marginally different from CalEEMod Output.
Construction GHG emissions are amortized over the 30-year lifetime of the project. Source: CalEEMod Output (Appendix A).

As previously discussed, the proposed project would minimize GHG emissions generated during project construction through the implementation of a variety of construction emission reduction measures such as utilizing existing power sources rather than on-site generators and managing construction traffic in a way to avoid or reduce traffic impacts and subsequent GHG emissions.

Operational GHG Emissions

Operational or long-term emissions occur over the life of a project. Proposed project operations were modeled for the 2027 operational year, immediately following the completion of construction. Sources for operational GHG emissions include:

- Motor Vehicles: These emissions refer to GHG emissions contained in the exhaust from the cars and trucks that would travel to and from the project site.
- Indirect Electricity: These emissions refer to those generated by off-site power plants to supply electricity required for the project.
- Area Sources: These emissions refer to those produced during activities such as landscape maintenance.
- Water Transport: These emissions refer to those generated by the electricity required to transport and treat the water to be used on the project site.
- Waste: These emissions refer to the GHG emissions produced by decomposing waste generated by the project.

As previously discussed, the proposed project would be an all-electric development, where there would be no natural gas hookups to the proposed project and per Title 24 requirements, the proposed project would be required to install enough solar panels to result in net zero energy usage. As such, the energy usage that represents both natural gas emissions and indirect electricity emissions, results in zero emissions from the proposed project. Table 6 presents the estimated annual GHG emissions from the proposed project's operations. As shown in Table 6, proposed project operations are estimated to result in an annual GHG emissions inventory of approximately 421 MT CO_2e.

Table 6: Operational GHG Emissions of Proposed Project

GHG Emissions Source	Total MT CO_2e/year
Mobile	387
Area	1.44
Energy	0.00
Water	6.23
Waste	12.9
Refrigeration	0.13
Amortized Construction Emissions	13.07
Total Annual Project Emissions	**421**
SCAQMD Threshold	**3000**
Exceed SCAQMD Threshold?	**No**
Notes: GHG = greenhouse gas $MTCO_2e$ = metric tons of carbon dioxide equivalents Because of rounding, total MT CO2e may be marginally different from CalEEMod Output. Construction GHG emissions are amortized over the 30-year lifetime of the project. Source: CalEEMod Output (Appendix A).	

The data provided in Table 6 shows that the proposed project would create 421 MT CO_2e per year, which is well below the SCAQMD's draft threshold of 3,000 MT CO_2e per year. In addition, as detailed below in Impact 2.8(b), the proposed project would be consistent with the applicable measures in the GHG Reduction Plan. Therefore, a less than significant generation of GHG emissions would occur from development of the proposed project. Impacts would be less than significant.

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

Less than significant impact. The proposed project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing GHG emissions. The City adopted the GHG Reduction Plan in July 2015. The GHG Reduction Plan was prepared to assist the City's power suppliers in conforming to the GHG emissions reductions as mandated under AB 32.

The GHG Reduction Plan provides a utilities GHG emission reduction target of 20 percent below 1990 levels by the year 2020 and a 40 percent below 1990 levels by 2030. According to the 2022 Power Content Label[53], currently 30.6 percent of power in the City is provided by renewable energy and over the past five years the Utility has reduced its emissions by approximately 40 percent, placing the City well ahead of the GHG reduction targets provided in the GHG Reduction Plan. The Plan provides reduction targets for energy usage, PV rooftop installations, and use of EVs.

For energy usage, the GHG Reduction Plan provides a target of a 15 percent reduction by 2020 and a 30 percent reduction by 2030 of the energy utilized by homes in Anaheim. This target will be met through application of State regulations including California Code of Regulations Title 24, Part 6. The 2022 Title 24 Building Standards that are required to be met for the proposed project's structures. The CEC estimates that the 2022 Title 24 changes from using natural gas furnaces to electric heat pumps to heat new homes and would reduce net CO_2 emissions by 16,230 MT CO_2e per year, when compared to the 2019 Title 24 standards. Homes built with the 2019 Standards will use about 7 percent less energy than the prior 2016 Standards. It should also be noted that the 2016 Title 24 Standards included new energy efficiency requirements that resulted in new homes being 15 percent more efficient than the 2013 Title 24 Part 6 Standards that were in effect at the time of the preparation of the GHG Reduction Plan. Therefore, through implementation of the State regulations the proposed project will meet the energy use reduction targets provided in the GHG Reduction Plan.

For PV rooftop installations, the GHG Reduction Plan provides a target of 27,000 kilowatts (kW) of PV systems installed by 2020 and 37,000 kW of PV systems installed by 2030. This target will be met through application of State regulations including Title 24, Part 6 that requires the proposed project to install a minimum of 215 kilowatts of PV solar panels onto the proposed townhomes. Therefore, through implementation of the State regulations the proposed project will assist the City in meeting the PV rooftop installation targets provided in the GHG Reduction Plan.

For EVs, the GHG Reduction Plan provides a target of 2,000 low or Zero-Emission Vehicles (ZEVs) by 2020 and 5,000 low or ZEVs by 2030. This target will be met through the application of State regulations including Title 24, Part 6 that requires all new garages to be wired for EV chargers. Therefore, development of the proposed project would assist the City in meeting the electric vehicle usage targets provided in the GHG Reduction Plan.

As detailed above, development of the proposed project would meet the targets outlined in the GHG Reduction Plan. Therefore, the proposed project would comply with the GHG Reduction Plan reduction targets and would not conflict with the applicable plan for reducing GHG emissions. Impacts would be less than significant.

Mitigation Measures

None required.

[53] City of Anaheim. 2024. Power Content Label. Website: https://www.anaheim.net/3452/Power-Content-Label. Accessed April 18, 2024.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.9 Hazards and Hazardous Materials *Would the project:*				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

Environmental Evaluation

Setting

The analysis in this section is based, in part, on the Phase I Environmental Site Assessment (Phase I ESA) prepared by Hillmann Consulting LLC, on May 2, 2023, and the Limited Phase II Subsurface Investigation Report prepared by Hillman Consulting LLC on June 5, 2023. Both reports are included in Appendix E of this document.

According to available historical sources, the subject property was originally developed as a packing house in 1907 and operated as a packing house until 1949. In 1949, the subject property was

redeveloped, and the western portion became the Smith Distribution Company, a bottling plant, and the eastern portion was developed into the Ganahl Lumber Company. The western portion of the subject property was eventually redeveloped into a paved lot with a single building and a large awning, and the bottling company was removed. However, according to the City Directory Abstract report (provided in the Phase I ESA; Appendix E.1), the eastern portion of the subject property remained a lumber milling operation until the 1990s. Lumber mills often use in-ground hydraulic lifts as well as railway spur tracks to transport heavy logs through a mill. Hydraulic lifts have the potential to contaminate subsurface due to the conduits within the ground and the oil and degreasing solvents used in their use and maintenance. The historic use of the subject property as a lumber mill represents a Recognized Environmental Condition (REC) in connection with the subject property. Based on these results, Hillmann conducted a Limited Phase II Subsurface Investigation at the property which included soil and soil gas sampling in targeted locations. The results from soil sampling indicated no significant concentrations of petroleum hydrocarbons or lead and no detectible concentrations of VOCs in any samples.

Would the project:

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

Less than significant impact. Construction of the proposed project would include the transport, use, and disposal of limited quantities of hazardous materials necessary for construction, including fuel and solvents. The use of these hazardous materials necessary would be typical of construction projects, would be short-term, and would be handled in accordance with standard construction practices, as well as with applicable federal, State, and local regulations. Regulatory requirements would include California Code of Regulations Title 22, Division 4.5, for appropriate management of hazardous materials, as well as the requirements of the EPA, Resource Conservation and Recovery Act (RCRA), California Department of Toxic Substance Control (DTSC), Cal/OSHA, and California Department of Transportation (Caltrans).

The proposed project would include residential development, which does not typically use or store large quantities of hazardous materials. During the operational phase of the proposed project, hazardous materials may be handled on the project site. Hazardous materials that would likely be used during operation would likely be limited to fertilizers, herbicides, pesticides, solvents, household cleaning agents, and similar materials used for maintenance and operation of the apartments, apartment building facilities, amenities, and landscaping. These types of materials are common and represent a low risk to people and the environment when used as intended. The proposed project would also be required to adhere to State and federal regulatory requirements as discussed above. Therefore, impacts associated with hazardous materials would be less than significant.

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

Less than significant impact. As discussed above, the Phase I ESA determined that the project site was previously used as a lumber mill, which is a REC. However, a Phase II ESA found that there were no significant concentrations of petroleum hydrocarbons or lead and no detectible concentrations of VOC in the soil, and no mitigation is required. No additional RECs, Historical Recognized Environmental Conditions (HRECs), or Controlled Recognized Environmental Conditions (CRECs) were identified.

As previously discussed above under Impact 2.9(a), the proposed project would be required to comply with all applicable local, State, and federal laws and regulations pertaining to the transport, use, disposal, handling, and storage of hazardous waste during the construction phase to reduce the likelihood and severity of accidents during transit. Proper handling of the use and disposal of hazardous materials associated with residential uses would reduce the potential for exposure.

Operation of the proposed project would not involve the transport, use, or disposal of large quantities of hazardous materials. The use of hazardous materials on the project site post-construction would consist of those commonly used in a residential setting for routine maintenance and cleaning and would not be of a significant quantity to create a reasonably foreseeable upset or accident. Therefore, impacts would be less than significant, and no mitigation would be required.

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

No impact. There are no schools within 0.25 mile of the project site. The nearest schools are Thomas Jefferson Elementary School (504 East South Street), 0.38 mile southeast of the project site; and Benjamin Franklin Elementary School (521 West Walter Street), 0.51 mile southwest of the project site. As discussed in Impact 2.9(a), construction of the proposed project would include the limited use of hazardous materials, such as fuel and solvents. However, use of these hazardous materials would be in compliance with all applicable local, State, and federal regulations. During operation of the proposed project, limited use of hazardous materials would likely be used for building maintenance. Similarly, these hazardous materials would be stored, handled, and disposed of in accordance with applicable regulations. Thus, the proposed project would not include any uses that could potentially generate hazardous materials in significant quantities that would have an impact to surrounding schools. Therefore, there would be no impact.

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. Government Code Section 65962.5 refers to the Hazardous Waste and Substance Site List, commonly known as the Cortese List. The Cortese List contains hazardous waste and substance sites with known underground storage tanks (USTs) having a reportable release; and solid waste disposal facilities from which there is a known migration. The Cortese List also includes hazardous substance sites selected for remedial action; historic Cortese Sites; and sites with known

toxic materials identified through the abandoned site assessment program. The proposed project would not be located on a site which is included on a hazardous materials site list compiled pursuant to California Government Code Section 65962.5. The closest sites recognized by the Cortese List are approximately 0.13 mile west of the project site and are active Voluntary Cleanup sites located at 407- 425 South Anaheim Boulevard and 111 West Elm Street.[54] None of the activities occurring at these sites would be close enough to the project site to have an impact. Therefore, the proposed project would not create a significant hazard to the public or the environment. No impact would occur, and no mitigation is required.

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. The project site is not within 2 miles of an airport. The nearest airport is the Fullerton Municipal Airport located 4.53 miles northwest of the project site. Other airports in proximity to the proposed project include: Joint Force Training Base Los Alamitos, located 8.61 miles southwest of the project site; John Wayne Airport, located 10.72 miles south of the project site; and the Long Beach Airport, located 13.17 miles west of the project site. The project site is not within the Airport Influence Areas of these airports and is not located within an airport land use plan. Therefore, the proposed project would not result in a safety hazard of excessive noise for people working or living at the project site. No impact would occur.

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

Less than significant impact. The City's Emergency Operations Plan (EOP), adopted in 2017, establishes a comprehensive framework of policy and guidance for emergency and disaster response operations.[55] The EOP provides comprehensive policy and guidance for emergency and response operations, and details the responsibilities of residents, organizations, and City departments. The City uses Anaheim Alert to contact residents immediately during emergencies to provide information regarding evacuations. Construction of the proposed project may require partial closure of East Santa Ana Street, South Philadelphia Street, and other public or private streets in the project area. However, such closures would be temporary in nature. Thus, construction of the proposed project would not impede the use of surrounding roadways for emergencies or access for emergency response vehicles. Operation of the proposed project would not interfere with roadways and would provide internal circulation for emergency vehicle access.

Furthermore, while the EOP does not contain specific evacuation routes, the City of Anaheim has emergency evacuation zones for the eastern portion of the City, where there is more open space and greater wildland fire hazard risk.[56] The project site is not located in any of the evacuation zones

[54] California Department of Toxic Substances Control (DTSC). 2024. Envirostor Hazardous Waste and Substances Site List Map. Website: https://www.envirostor.dtsc.ca.gov/public/map/. Accessed August 5, 2024.

[55] City of Anaheim. 2017. Emergency Operation Plan. Website: https://www.anaheim.net/DocumentCenter/View/21657/City-of-Anaheim-EOP-2017. Accessed January 4, 2024.

[56] City of Anaheim. Know Your Way Evacuation Zones. Website: https://www.anaheim.net/6063/Know-Your-Way-Evacuation-Zones. Accessed August 5, 2024.

because it is in the center of the City. Therefore, because the proposed project would not impede the use of surrounding roadways for emergencies or access for emergency response vehicles, the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Thus, impacts would be less than significant.

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

No impact. The project site is located in an urbanized, flat area and does not contain slopes that could contribute to wildfire. The project site is not located along an urban-wildfire interface and is not located in the eastern portion of the City, where wildfires are of the greatest risk. While the eastern portion of the City has historically been subject to wildfire, the project site and its surrounding areas do not have a history of wildfire.[57] CAL FIRE has mapped fire threat potential throughout California and ranks fire threats on a scale of no fire threat, moderate, high, and very high fire severity. According to the CAL FIRE Hazards Severity Zone Mape Viewer, the project site is not located in a Fire Hazard Severity Zone (FHSZ).[58]

The project site is located within a Local Responsibility Area (LRA). Land within an LRA is either located within a Very High FHSZ or a non-Very High FHSZ. The project site is designated as a non-Very High FHSZ.[59] Further, the project site is in a developed, built-up urban area that is not adjacent to any Very High FHSZ or areas in the wildland-urban interface. Therefore, the proposed project is not likely to expose people or structures to wildland fire hazards. No impact would occur.

Mitigation Measures

None required.

[57] California Department of Forestry and Fire Protection (CAL FIRE). 2022. California Fire Perimeters through 2021. Website: https://calfire-forestry.maps.arcgis.com/apps/mapviewer/index.html?layers=e3802d2abf8741a187e73a9db49d68fe. Accessed August 5, 2024.

[58] California Department of Forestry and Fire Protection (CAL FIRE). Fire Hazard Severity Zones in State Responsibility Area. Website: https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008. Accessed August 5, 2024.

[59] California Department of Forestry and Fire Protection (CAL FIRE). Very High Fire Hazard Severity Zones in LRA As Recommended by CAL FIRE. Website: https://www.osfm.fire.ca.gov/media/5880/c30_anaheim_vhfhsz.pdf. Accessed August 5, 2024.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.10 Hydrology and Water Quality *Would the project:*				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of 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;	☐	☐	☒	☐
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
(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; or	☐	☐	☒	☐
(iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Environmental Evaluation

Setting

The following analysis is based, in part, on Priority Project Preliminary Water Quality Management Plan (WQMP) and the Hydrology and Hydraulics Report prepared by Moran Consulting Corporation (Moran Consulting), both included as Appendix F.

The project site is within the Coastal Plain of Orange County Groundwater Basin (Basin). The Basin is managed by the Orange County Water District (OCWD), in concert with the Irvine Ranch Water District, and the City of La Habra. These agencies collaborated to prepare the Basin 8-1 Alternative as

an alternative to a Groundwater Sustainability Plan (GSP); the Basin 8-1 Alternative is functionally equivalent to a GSP and is the managing document for groundwater sustainability of the basin. The Basin is considered a medium-priority basin, therefore, requiring a GSP (or alternative) under the Sustainable Groundwater management Act (SGMA).[60]

Recharge to the basin is derived from percolation of Santa Ana River flow, infiltration of precipitation, and injection into wells.[61] Approximately 98 percent of the groundwater production in the Basin occurs within the OCWD Management Area. The OCWD operates an extensive network of recharge basins to increase recharge of surface water into the Basin.[62]

The project site is covered by asphalt concrete pavement and is approximately 100 percent impervious. The project site is separated into two Drainage Management Areas (DMAs); stormwater from the project site (both DMAs) drains to the Barber City Channel, Bolsa Chica Channel, and then to Anaheim Bay and the Pacific Ocean.[63]

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) of the area, the project site is within the 500-year flood zone (Zone X).[64]

Would the project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less than significant impact. Construction activities would include demolition of the existing paved surfaces and structures, site preparation, grading, building construction, architectural coatings, and paving. Construction of the proposed project would require a small amount of import (maximum of 5,000 CY) to obtain the necessary slopes for proper drainage of the site. If gone unmanaged, ground disturbance from construction activities would result in a potentially significant impact.

As the proposed project would disturb more than one acre of land, it would be required to comply with the NPDES permit. The WQMP prepared for the proposed project is intended to comply with the requirements of the County of Orange NPDES Stormwater Program. The WQMP outlines the operation and maintenance of all BMPs to be used at the project site, including a catch basin storm filter, hydrologic source controls, and structural and nonstructural source controls.

As discussed above, the project site is within the Coastal Plain of Orange County Groundwater Basin, which is managed by the OCWD through the Basin 8-1 Alternative. The Basin 8-1 Alternative outlines groundwater sustainability goals as well as measures to protect the groundwater quality of the Basin.

[60] Orange County Water District (OCWD). 2017. Basin 8-1 Alternative. January 1, 2017.
[61] Department of Water Resources (DWR). 2004. South Coast Hydrologic Region, Coastal Plain of Orange County Groundwater Basin. California's Groundwater, Bulletin 118. Updated February 27, 2004.
[62] Orange County Water District (OCWD). 2017. Basin 8-1 Alternative. January 1, 2017.
[63] Moran Consulting Corporation (Moran Consulting). 2023. Hydrology and Hydraulics Report, TECH2023-01475, Tentative Tract No. 19290, 275 and 375 E. Santa Ana Street, Anaheim, CA, 92805. November 7, 2023.
[64] Federal Emergency Management Agency (FEMA). 2009. Flood Insurance Rate Map (FIRM), Panel 133 of 538. Map Number 06059C0133J. National Flood Insurance Program. Effective date December 3, 2009. Map. Scale 1:6,000.

The proposed project would comply with the NPDES requirement through implementation of the WQMP and the project would be designed consistent with the groundwater sustainability goals outlined in the Basin 8-1 Alternative; as such, the proposed project would not violate water quality standards or degrade surface or groundwater quality. The impact would be less than significant.

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. As discussed above, the project site is within the Coastal Plain of Orange County Groundwater Basin, which is managed by the OCWD through the Basin 8-1 Alternative.

The proposed project would reduce impervious surfaces from approximately 89,283 square feet to 68,745 square feet and, therefore, would not interfere with groundwater recharge through the addition of impervious surfaces. Water service is provided by Anaheim Public Utilities Water Service and the proposed project would connect to existing domestic water lines within East Santa Ana Street. Additionally, the proposed project would not require the pumping or use of groundwater during construction activities.

The proposed project activities would not decrease groundwater supplies or interfere with groundwater recharge and would be in compliance with the groundwater sustainability goals provided in the Basin 8-1 Alternative. The impact to groundwater resources would be less than significant.

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

(i) result in substantial erosion or siltation on- or off-site;

Less than significant impact. As discussed above, the proposed project would not increase impervious surfaces at the project site. Additionally, the proposed project would not alter the course of a river or stream. As such, the proposed project would not alter the existing drainage pattern at the project site in a manner which would result in substantial on- or off-site erosion or siltation. Additionally, the proposed project would implement the provisions provided in the WQMP prepared for the proposed project—which includes ongoing operation and management of BMPs at the project site. Further, adherence to the WQMP would ensure compliance with County NPDES Stormwater Program. The impact would be less than significant.

(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

Less than significant impact. As discussed above, the proposed project would not substantially alter the existing drainage pattern at the project site through the increase of impervious surfaces at the project site, or by altering the course of a river or stream. The proposed project would be designed consistent with the approved drainage plan provided in the Hydrology and Hydraulics Report and

would not result in increased surface runoff in a manner which would result in flooding. According to the Hydrology and Hydraulics Report the proposed project would produce less runoff than the existing conditions at the project site—due to a combination of increased pervious surface (i.e., more landscaping). The impact would be less than significant.

(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; or

Less than significant impact. As discussed above, the proposed project would not substantially alter the existing drainage pattern at the project site through the increase of impervious surfaces at the project site, or by altering the course of a river or stream. The proposed project would connect to existing water and sanitary sewer lines and would include the installation of stormwater management systems on-site. Stormwater would drain to the new private motor courts where it would be collected into perforated pipes that will use infiltration to treat stormwater. The proposed project would be designed consistent with the approved drainage plan provided in the Hydrology and Hydraulics Report and would not exceed the capacity of the existing stormwater drainage system. Additionally, the proposed project would implement the provisions provided in the WQMP prepared for the proposed project—which includes ongoing operation and management of BMPs at the project site. Further, adherence to the WQMP would ensure compliance with County NPDES Stormwater Program. Compliance with the WQMP would address potential additional sources of polluted runoff from the project site. The impact would be less than significant.

(iv) impede or redirect flood flows?

Less than significant impact. As discussed above, the proposed project would not substantially alter the existing drainage pattern at the project site through the increase of impervious surfaces at the project site, or by altering the course of a river or stream. The project site is within the 500-year flood zone; however, the proposed project would be designed consistent with the approved drainage plan provided in the Hydrology and Hydraulics Report and would not cause flood flows to be impeded or redirected. The impact would be less than significant.

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

Less than significant impact. The project site is approximately 12.3 miles from the Pacific Ocean and is not near any other large body of water; therefore, the project site is not at risk of inundation from a tsunami or seiche. As discussed above, the project site is within the 500-year flood zone; However, it would not include the storage of hazardous materials that could be released into the environment due to inundation from a flood. As such, the impact would be less than significant.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less than significant impact. As previously discussed, the proposed project would be in compliance with the WQMP prepared for the proposed project to ensure that the proposed project meets water quality standards and would not degrade surface or groundwater quality. Additionally, the proposed project would be in compliance with the groundwater sustainability goals outlined in the Basin 8-1

Alternative. As the proposed project would be required to comply with these managing documents and would not conflict with the requirements and management goals identified therein, the impact would be less than significant.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.11 Land Use and Planning *Would the project:*				
a) Physically divide an established community?	☐	☐	☒	☐
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Environmental Evaluation

Setting

The General Plan currently designates the project site Low Medium Density Residential. The proposed project would require a GPA to amend the land use designation from Low Medium Density Residential to Medium Density Residential. The Medium Density Residential land use designation is intended to provide a quality multiple-family living environment with design amenities such as recreational-leisure areas, business services, swimming pools, etc. This designation allows residential uses at a density of up to 36 du/ac.

The project site currently has a General Plan Land Use Designation of Low Medium Density Residential allowing up to 18 du/gross acres. The proposed project would require a GPA to amend the land use designation from Low Medium Density Residential to Medium Density Residential. The proposed project would be consistent with the Medium Density Residential land designation's maximum density of 36 du/gross acres.

The project site is zoned Industrial (I) with the RO Overlay Zone and the South Anaheim Boulevard Corridor Overlay Zone. The purpose of the RO Overlay Zone is to provide "by-right" housing development opportunities consistent with a property's residential General Plan land use designation. This Overlay Zone is intended to be applied to properties that are currently zoned and/or developed with nonresidential uses but designated for multiple-family residential uses by the General Plan. The Overlay Zone is intended to serve as an implementation tool of the City's Housing Element of the General Plan by facilitating residential development on identified "housing opportunity sites." In conjunction with the proposed GPA to Medium Density Residential, pursuant to the RO Overlay the proposed project would be subject to the RM-4 zoning development standards.

Would the project:

a) Physically divide an established community?

Less than significant impact. The project site is in a highly developed and urbanized area. The surrounding area contains retail and residential uses, similar to the project site. The project site is not large enough or otherwise configured in such a way that would create a physical barrier within an established community. A typical example of such a barrier would be a project that involved a continuous right-of-way, such as a roadway, which would divide a community and impede access between parts of the community. The proposed project does not include these types of features. Implementation of the proposed project would not disrupt the surrounding land uses or divide the physical arrangement of the established communities to the north and east of the project site. Therefore, the proposed project would not physically divide an established community. Impacts would be less than significant, and no mitigation is required.

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

Less than significant impact. The proposed project would include a GPA to amend the General Plan land use designation from Low Medium Density Residential to Medium Density Residential. The land uses to the north, south, and east of the project site are designated by the General Plan for Low Density, Low Medium Density, and Medium Density Residential uses. Land use to the west are designated for Mixed Use–High uses. The proposed GPA would be consistent with the existing surrounding land uses, and with the approval of the GPA, the proposed project would not conflict with any applicable land use plan, policy, or regulation. Impacts are therefore considered less than significant, and no mitigation is required.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.12 Mineral Resources *Would the project:*				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Environmental Evaluation

Setting

The information and analysis for Mineral Resources Impacts is based on the Anaheim General Plan Green Element. The project site is zoned I and is located in an urbanized area in the City of Anaheim, and no known mineral resources are present on-site.

Would the project:

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

No impact. According to the General Plan, mineral resources are located in parts of East Anaheim, Anaheim Canyon, and the City's Hill and Canyon Areas. These are identified as being within Mineral Resource Zone, Class 2 (MRZ-2). The MRZ-2 designation represents, "areas where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists."[65] The project site is located in the western/central portion of the City and is not located in either of these zones; therefore, project implementation would not affect any known mineral deposits. Additionally, the entire project site would be within the I zone and the RO Overlay Zone; therefore, project implementation would not result in the loss of availability of known mineral resources. Thus, no impacts would occur.

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

No impact. The project site is currently developed with industrial uses. General Plan Figure G-3, Mineral Resource Map, does not identify any known State or locally designated mineral resources or

[65] City of Anaheim. May 2004. Anaheim General Plan Green Element. Website: https://www.anaheim.net/DocumentCenter/View/9521/F-Green-Element?bidId=. Accessed June 10, 2024.

locally important mineral resource recovery site on or near the project site.[66] The project site is designated Low Medium Density Residential and, with approval of the proposed GPA, would be amended to Medium Density Residential. The entire project is zoned Industrial. These designations and zoning do not permit mineral extraction. Furthermore, the project site is an urbanized area and does not support mineral extraction operations. Therefore, there would be no loss of a known mineral resource with project implementation. No impact would occur.

Mitigation Measures

None required.

[66] City of Anaheim. May 2004. Anaheim General Plan Figure G-3, Mineral Resource Map. Website: https://www.anaheim.net/DocumentCenter/View/9521/F-Green-Element?bidId=. Accessed June 10, 2024.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.13 Noise *Would the project result in:*				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

Environmental Evaluation

Setting

The analysis is based on noise modeling provided in Appendix G, which was developed based on the construction equipment parameters and operational traffic data. Existing noise sources at the project site include stationary noise from surrounding land uses, railroad noise, and traffic noise along adjacent roadway segments. The dominant noise source is from the lumber mill equipment located south of the project site with the loudest equipment located south of terminus of Philadelphia Street. Noise is also created from the railroad that runs down the middle of Santa Ana Street and starts turning south at the terminus of Philadelphia Street and then runs south in the middle of Olive Street. To determine the existing noise levels, 24 hours noise measurements were taken on the project site and the results are shown in Table 7 and Appendix G contains the noise measurements printouts along with a photo index of the noise measurement locations.

Table 7: Existing (Ambient) Noise Levels

Site No.	Measurement Location	Average (dBA L_{eq})	Maximum (dBA L_{max})	dBA $L_{eq\ 1\text{-}hour}$/Time		Weighted Average (dBA CNEL)
				Minimum	Maximum	
1	Located near the southwest corner of the project site, approximately 35 feet east of Claudina Street centerline and 50 feet north of Santa Ana Street centerline	63.1	96.9	50.3 1:13 a.m.	69.4 6:22 a.m.	69.3
2	Located near the southern side of the middle of the project site, approximately 35 feet west of Philadelphia Street centerline and 50 feet north of Santa Ana Street centerline	65.6	100.1	51.2 2:24 a.m.	73.7 6:16 a.m.	71.6
3	Located near the southeast corner of the project site, approximately 30 feet west of Olive Street centerline and 40 feet north of Santa Ana Street centerline	65.2	98.6	51.5 2:20 a.m.	70.5 1:47 p.m.	69.7

Notes:
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibel
L_{eq} = equivalent sound level
Source: Noise measurements taken between Monday, March 18, 2024 and Tuesday, March 19, 2024 with three Larson Davis Model LXT1 Class 1 sound level meters.

Regulatory Framework

The City of Anaheim addresses noise in the Noise Element of its General Plan adopted in 2004 and in the Anaheim Municipal Code. Temporary and long-term noise impacts resulting from the proposed project would be regulated or otherwise evaluated by City of Anaheim standards designed to protect public well-being and health.

General Plan

The General Plan Noise Element contains a variety of goals, policies, and other guidance pertaining to the control of noise. The following is a list of the City's noise-related goals and policies. Certain goals and policies have been omitted, as they are not relevant to the proposed project (i.e., policies instructing the City to adopt various noise standards, policies related to heliports, etc.).

GOAL 1.1 **Protect sensitive land uses from excessive noise through diligent planning and regulation.**

Policy 2 Continue to enforce acceptable noise standards consistent with health and quality of life goals and employ effective techniques of noise abatement through such means as a noise ordinance, building codes, and subdivision and zoning regulations.

Policy 3 Consider the compatibility of proposed land uses with the noise environment when preparing, revising or reviewing development proposals.

Policy 4 Require mitigation where sensitive uses are to be placed along transportation routes to ensure that noise levels are minimized through appropriate means of mitigation thereby maintaining quality of life standards.

Policy 5 Encourage proper site planning and architecture to reduce noise impacts.

Policy 6 Discourage the siting of sensitive uses in areas in excess of 65 dBA CNEL without appropriate mitigation.

Policy 7 Require that site-specific noise studies be conducted by a qualified acoustic consultant utilizing acceptable methodologies while reviewing the development of sensitive land uses or development that has the potential to impact sensitive land uses.

GOAL 2.1 Encourage the reduction of noise from transportation-related noise sources such as motor vehicles, aircraft operations, and railroad movements.

Policy 2 Employ noise mitigation practices, as necessary, when designing future streets and highways, and when improvements occur along existing road segments. Mitigation measures should emphasize the establishment of natural buffers or setbacks between the arterial roadways and adjoining noise-sensitive areas.

Policy 3 Require that development generating increased traffic and subsequent increases in the ambient noise level adjacent to noise-sensitive land uses provide appropriate mitigation measures.

Policy 4 Maintain roadways so that the paving is in good condition to reduce noise-generating cracks, bumps, and potholes.

Policy 5 Require sound walls, berms and landscaping along existing and future freeways and railroad rights-of-way to beautify the landscape and reduce noise, where appropriate.

Policy 11 Encourage the development of alternative transportation modes that minimize noise within residential areas.

GOAL 3.1 Protect residents from the effects of "spill over" or nuisance noise emanating from the City's activity centers.

Policy 1 Discourage new projects located in commercial or entertainment areas from exceeding stationary source noise standards at the property line of proximate residential or commercial uses, as appropriate.

Policy 3 Enforce standards to regulate noise from construction activities. Particular emphasis shall be placed on the restriction of the hours in which work other than emergency work may occur. Discourage construction on weekends or holidays except in the case of construction proximate to schools where these operations could disturb the classroom environment.

Policy 4 Require that construction equipment operate with mufflers and intake silencers no less effective than originally equipped.

Policy 5 Encourage the use of portable noise barriers for heavy equipment operations performed within 100 feet of existing residences or make applicant provide evidence as to why the use of such barriers is infeasible.

City of Anaheim Municipal Code

The Anaheim Municipal Code establishes the following applicable standards related to noise.

6.70.010 Established.

Sound produced in excess of the sound pressure levels permitted herein is hereby determined to be objectionable and constitutes an infringement upon the right and quiet enjoyment of property in this City.

No person shall within the City create any sound radiated for extended periods from any premises which produces a sound pressure level at any point on the property line in excess of 60 decibels (Re 0.0002 Microbar) read on the A-scale of a sound level meter. Readings shall be taken in accordance with the instrument manufacturer's instructions, using the slowest meter response.

The sound level measuring microphone shall be placed at any point on the property line, but not closer than three (3) feet from any wall and not less than three (3) feet above the ground, where the above listed maximum sound pressure level shall apply. At any point the measured level shall be the average of not less than three readings taken at two (2) minute intervals. To have valid readings, the levels must be 5 decibels or more above the levels prevailing at the same point when the sources of the alleged objectionable sound are not operating.

Sound pressure levels shall be measured with a sound level meter manufactured according to American Standard S1.4-1961 published by the American Standards Association, Inc., New York City, New York.

Traffic sound created by emergency activities and sound created by governmental units or their contractors shall be exempt from the applications of this chapter. Sound created by construction or building repair of any premises within the City shall be exempt from the applications of this chapter during the hours of 7:00 a.m. to 7:00 p.m. Additional work hours may be permitted if deemed necessary by the Director of Public Works or Building Official.

18.40.090 Sound Attenuation for Residential Developments.

.010 **Applicability.** Residential developments involving the construction of two (2) or more dwelling units, or residential subdivisions resulting in two (2) or more parcels, and located within six hundred (600) feet of any railroad, freeway, expressway, major arterial, primary arterial or secondary arterial, as designated by the Circulation Element of the General Plan, shall comply with the provisions of this section. The construction of an accessory dwelling unit such as a second unit or senior second unit as prescribed in Section 18.38.230 shall not constitute a residential development subject to the provisions of this section.

.020 **Study Required.** A noise level analysis shall be performed for any new residential development or subdivision to determine the projected interior and exterior noise levels within the development. The study shall include mitigation measures that would be required to comply with applicable City noise standards, as identified in this section. The study shall be provided by the applicant, at its sole expense, to the City at the time of application for development of the residential development or subdivision.

.030 **Attenuation.** Mitigation measures, without limitation, may include masonry walls, an earthen berm or a combination thereof. Masonry walls must comply with the requirements of Chapter 18.46 (Landscaping and Screening). The height of any proposed walls may not exceed the maximum height limitations of the underlying zone, unless a variance is granted by the approval authority, or City Council on appeal, in accordance with the procedures established in Chapter 18.60 (Common Procedures) for the processing of variances.

.040 **Single-Family Detached.** Exterior noise within the private rear yard of any single-family lot and/or within any common recreation areas, shall be attenuated to a maximum of sixty-five (65) dB CNEL. Interior noise levels shall be attenuated to a maximum of forty-five (45) dB CNEL, or to a level designated by the Uniform Building Code, as adopted by the City.

.050 **Single-Family Attached or Multiple-Family.** Exterior noise within common recreation areas of any single-family attached or multiple-family dwelling project shall be attenuated to a maximum of sixty-five (65) dB CNEL. Interior noise levels shall be attenuated to a maximum of forty-five (45) dB CNEL, or to a level designated by the Uniform Building Code, as adopted by the City.

.060 **Minor Deviations.** Notwithstanding any provision of this Code to the contrary, the Planning Commission may grant a deviation from the requirements imposed by subsections .040 and .050 of this section pertaining to exterior noise levels in accordance with the procedures established in Chapter 18.60 (Common Procedures) for the processing of variances except that the findings set forth in Section 18.74.060 (Findings) of Chapter 18.74 (Variances) shall not be required and provided that before any such deviation is granted by the Planning Commission, the evidence presented shows that all of the following conditions exist:

.0601 The deviation from prescribed levels does not pertain to interior noise levels;

.0602 The deviation does not exceed five (5) dB CNEL above the prescribed levels for exterior noise; and

.0603 Measures to attenuate noise to the prescribed levels would compromise or conflict with the aesthetic value of the project.

Would the project result in:

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

Construction Noise Impacts

Less than significant impact. The City has not adopted construction-related noise thresholds of significance for CEQA consideration. Section 6.70.010 of the Anaheim Municipal Code establishes a 60 dBA regulatory noise standard, but it also exempts daytime construction activities from this standard.[67] Therefore, Section 6.70.010 cannot be utilized to assess the proposed project's construction-related noise impacts. The General Plan Noise Element contains noise standards for various land use categories, but it is evident that the General Plan does not intend these limits to apply to temporary construction noise sources.

Given these factors, the following analysis utilizes the Federal Transit Administration (FTA) "General Assessment Construction Noise Criteria" as thresholds of significance to assess the effect of the proposed project's construction-related noise impacts at nearby sensitive receptors. For residential uses, the FTA's criteria include a 90 dBA ($L_{eq\ (1\ hour)}$) daytime limit and a 80 dBA nighttime limit. For commercial uses, the FTA's criteria include a 100 dBA L_{eq} daytime and nighttime limit. It should be noted that the FTA Manual provides for two different levels of assessment of construction noise and the current state of the proposed project meets the definition of a General Assessment, which is defined as "projects in an early assessment stage when the equipment roster and schedule are undefined and only a rough estimate of construction noise levels is practical." As such, construction noise has been analyzed based on the methodology for a General Assessment. However, in order to provide a more conservative analysis, for each phase of construction, all construction equipment was analyzed based on being placed in the middle of the project site, instead of just the two nosiest pieces of equipment as detailed in the FTA Manual for a General Assessment.

Construction of the proposed project would generate noise during the estimated year of construction that would include demolition, site preparation, grading, building construction, paving and architectural coatings phases. Construction activities would occur during regular construction hours, which are generally between 7:00 a.m. and 5:00 p.m. on weekdays. Construction would also utilize a standard 5-day work week. Therefore, the proposed project's construction would be consistent with Goal 3.1, Policy 3 of the City's General Plan Noise Element, which discourages construction on weekends or holidays and as such, this analysis has been limited to analyzing the daytime construction noise impacts.

Construction noise levels to the nearby sensitive receptors have been calculated through use of the Roadway Construction Noise Model (RCNM) Version 1.1 and the construction equipment for each phase was obtained from the CalEEMod model output files (see Appendix A). The results are shown below in Table 8 and the RCNM printouts are provided in Appendix G.

[67] Nighttime construction activities that take place between 7:00 p.m. and 7:00 a.m. would be subject to Section 6.70.010, but the project is not anticipated to require nighttime construction.

Table 8: Construction Noise Levels at Nearby Homes Prior to Mitigation

Construction Phase	Construction Noise Levels (dBA L_{eq}) at:		
	Anaheim Packing District to the West[1]	Multi-family Homes to the North[2]	Single-family Homes to the East[3]
Demolition	67	81	67
Site Preparation	66	80	66
Grading	66	80	66
Building Construction	67	81	67
Paving	65	78	65
Painting	55	69	55
FTA Construction Thresholds	**100**	**90**	**90**
Exceed Threshold?	**No**	**No**	**No**

Notes:
[1] The Anaheim Packing District to the west is located as near as 435 feet from the center of the project site.
[2] The multi-family homes to the north are located as near as 91 feet from the center of the project site.
[3] The single-family homes to the east is located as near as 440 feet from the center of the project site.
Source: Roadway Construction Noise Model (RCNM). Federal Highway Administration (FTA). 2006.

Table 9 shows that the greatest noise impacts would occur during the demolition and building construction phases with noise levels as high as 67 dBA L_{eq} at the Anaheim Packing District to the west, 81 dBA L_{eq} at the multi-family homes to the north, and 67 dBA L_{eq} at the single-family homes to the east. The calculated construction noise levels shown in Table 9 are within the FTA daytime construction noise standard of 90 dBA at the nearby homes and within the 100 dBA noise standard at the Anaheim Packing District to the west. Therefore, through adherence to the allowable construction times detailed in Section 6.70.010 of the Municipal Code, the proposed project would not create a substantial temporary increase in ambient noise levels from construction of the proposed project. As such, impacts would be less than significant.

Operational Noise Impacts

Less than significant impact. The proposed project would consist of the development of a residential community with 56 townhomes. The proposed project would include common space area that would include shaded seating areas, barbeques, open lawn games such as cornhole, and possibly fireplaces for the use of the residents. No known noise sources such as tot lots, dog parks, or ball courts would be included in the common space areas. The on-site noise sources would be lower than the existing ambient noise levels that are primarily created from the lumber mill and railroad to the south as well as from vehicles operating on the nearby roadways. As such, less than significant on-site noise source impacts would occur from operation of the proposed project. Therefore, this analysis is limited to analyzing the project's operational noise impacts from project generated vehicle trips, which is discussed below.

Vehicle noise is a combination of the noise produced by the engine, exhaust and tires. The level of traffic noise depends on three primary factors (1) the volume of traffic, (2) the speed of traffic, and (3) the number of trucks in the flow of traffic. The proposed project does not propose any uses that would require a substantial number of truck trips and the proposed project would not alter the speed limit on any existing roadway so the proposed project's potential off-site noise impacts have been focused on the noise impacts associated with the change of volume of traffic that would occur with development of the proposed project.

Policy 3 under Goal 2.1 of the City's General Plan Noise Element requires new development that generates increased traffic and subsequent increases in noise to noise-sensitive land uses to provide appropriate mitigation. However, since the General Plan does not define what increase in roadway noise would be considered significant, the noise increase thresholds detailed in the City's General Plan EIR has been utilized in this analysis. The General Plan EIR utilized a mobile source noise threshold of: A 5 dBA increase threshold where the without project roadway noise levels are below 65 dBA CNEL at the nearest homes; or A 3 dBA increase threshold where the without project roadway noise levels are 65 dBA CNEL or higher.

The potential off-site traffic noise impacts created by the ongoing operations of the proposed project have been analyzed through utilization of the Federal Highway Administration (FHWA) model and the FHWA model traffic noise calculation spreadsheets are provided in Appendix G. The proposed project's potential off-site traffic noise impacts have been analyzed for the existing year and opening year 2027 scenarios that are discussed separately below.

Existing Year Conditions

The proposed project's potential off-site traffic noise impacts have been calculated through a comparison of the Existing scenario to the Existing With Project scenario. The results of this comparison are shown in Table 9.

Table 9: Existing Year Project Traffic Noise Contributions

Roadway	Segment	dBA CNEL at Nearest Receptor[1]			Increase Threshold[2]
		Existing	Existing Plus Project	Project Contribution	
Anaheim Boulevard	South of Santa Ana Street	62.8	62.8	+0.0	+5 dBA
Claudina Street	North of Santa Ana Street	51.4	51.6	+0.2	+5 dBA
Philadelphia Street	North of Santa Ana Street	50.1	50.6	+0.5	+5 dBA
Olive Street	North of Broadway	60.1	60.1	+0.0	+5 dBA
Olive Street	North of Santa Ana Street	56.8	56.9	+0.1	+5 dBA
Olive Street	South of Santa Ana Street	57.8	57.9	+0.1	+5 dBA
Broadway	West of Olive Street	65.4	65.4	+0.0	+3 dBA
Broadway	East of Olive Street	63.3	63.3	+0.0	+5 dBA

Roadway	Segment	dBA CNEL at Nearest Receptor[1]			Increase Threshold[2]
		Existing	Existing Plus Project	Project Contribution	

Notes:
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibel
[1] Distance to nearest residential use shown in Appendix G. Does not take into account existing noise barriers.
[2] Increase Threshold obtained from General Plan Goal 2.1, Policy 3.
Source: Federal Highway Administration (FHWA) Traffic Noise Prediction Model FHWA-RD-77-108.

Table 10 shows that the proposed project's permanent roadway noise increases to the nearby homes from the generation of additional vehicular traffic would not exceed the allowable noise increase thresholds detailed above. Therefore, the proposed project would not result in a substantial permanent increase in ambient noise levels for the existing conditions. Impacts would be less than significant.

Opening Year 2027 Conditions

The proposed project's potential off-site traffic noise impacts have been calculated through a comparison of the Existing Plus Approved Plus Ambient Growth 2027 scenario to the Existing Plus Approved Plus Ambient Growth 2027 With Project scenario. The results of this comparison are shown in Table 10.

Table 10: Opening Year 2027 Project Traffic Noise Contributions

Roadway	Segment	dBA CNEL at Nearest Receptor[1]			Increase Threshold[2]
		Year 2027 No Project	Year 2027 Plus Project	Project Contribution	
Anaheim Boulevard	South of Santa Ana Street	63.0	63.0	+0.0	+5 dBA
Claudina Street	North of Santa Ana Street	51.5	51.7	+0.2	+5 dBA
Philadelphia Street	North of Santa Ana Street	50.5	51.0	+0.5	+5 dBA
Olive Street	North of Broadway	60.3	60.4	+0.1	+5 dBA
Olive Street	North of Santa Ana Street	57.0	57.1	+0.1	+5 dBA
Olive Street	South of Santa Ana Street	57.9	58.0	+0.1	+5 dBA
Broadway	West of Olive Street	65.6	65.6	+0.0	+3 dBA
Broadway	East of Olive Street	63.5	63.5	+0.0	+5 dBA

Notes:
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibel
[1] Distance to nearest residential use shown in Appendix G. Does not take into account existing noise barriers.
[2] Increase Threshold obtained from General Plan Goal 2.1, Policy 3.
Source: Federal Highway Administration (FHWA) Traffic Noise Prediction Model FHWA-RD-77-108.

Table 10 shows that the proposed project's permanent roadway noise increases to the nearby homes from the generation of additional vehicular traffic would not exceed the allowable noise increase thresholds detailed above. Therefore, the proposed project would not result in a substantial permanent increase in ambient noise levels for the opening year 2027 conditions. Impacts would be less than significant.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less than significant impact. There are no federal, State, or City standards that would regulate the proposed project's vibration impacts from temporary construction activities or long-term operations. Therefore, in order to assess the effect of project-related groundborne vibration, the following analysis has utilized the Transportation- and Construction Vibration Guidance Manual, prepared by Caltrans, April 2020, that provides practical guidance to Caltrans engineers, planners, and consultants who must address vibration issues associated with the construction, operation, and maintenance of Caltrans projects. This manual is also used as a reference point by many lead agencies and CEQA practitioners throughout California, as it provides numeric thresholds for vibration impacts. Thresholds are established for continuous (construction-related) and transient (transportation-related) sources of vibration, which found that the human response becomes distinctly perceptible at 0.25 inch per second peak particle velocity (PPV) for transient sources and 0.04 inch per second PPV for continuous sources.

Groundborne vibrations consist of rapidly fluctuating motions within the ground that have an average motion of zero. Vibrating objects in contact with the ground can radiate vibration waves through various soil and rock strata to the foundations of nearby buildings. In extreme cases, excessive groundborne vibration has the potential to cause structural damage to buildings. Common sources of groundborne vibration include trains, construction activities, and certain industrial operations. Vibration from traffic on smooth roadways is rarely perceptible, even from larger vehicles such as buses or trucks. The proposed project's construction and operational groundborne vibration impacts are analyzed separately below.

Short-Term Construction Vibration Impacts

Construction of the proposed project would require the use of off-road construction equipment that produce a known source of vibration. Based on the construction equipment list that was generated by the CalEEMod model (see Appendix A), a large dozer would create the highest level of vibration at 0.089 inch per second PPV at 25 feet. Based on typical propagation rates, the vibration level at the nearest off-site structures (multi-family homes located as near as 23 feet to the north) would be 0.098 inch per second PPV. The vibration level at the nearest off-site structure would be below the 0.25 inch per second PPV threshold detailed above. Therefore, a less than significant vibration impact is anticipated from construction of the proposed project.

Long-Term Operational Vibration Impacts

The proposed project would consist of the development of a residential community. The ongoing operation of the proposed project would not include the operation of any known vibration sources other than typical on-site vehicle operations for residential development. Therefore, a less than significant vibration impact is anticipated from the operation of the proposed project.

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?

Less than significant impact. There are no airports located within 2 miles of the proposed project. The nearest airport is Fullerton Municipal Airport, located 4.53 miles northwest of the project site, and, the project site is located outside of the 60 dBA CNEL noise contours of this airport. Therefore, people residing or working in the proposed townhomes would not be exposed to excessive aircraft noise. Impacts would be less than significant.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.14 Population and Housing *Would the project:*				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Environmental Evaluation

Setting

The City's 2014-2021 Housing Element projected that the City would reach a population of 369,107 persons by 2020.[68] However, according to the California Department of Finance, the City only had a population of 340,160 persons as of January 1, 2024.[69]

Would the project:

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. As described above, the City had a provisional population estimate of 340,160 persons as of January 1, 2024.[70] According to the General Plan Housing Element, the City has between of 3.41 persons per household.[71] The project would include the construction of 56 for-sale 3-story condominium townhomes, which would increase the City's population by up to 191 persons based on the average household size.[72] This is approximately 0.05 percent of the City's existing population, which is a negligible increase of the City's total population. The City's 2014-2021 Housing Element projected that the City would reach a population of 369,107 persons by 2020.[73] Because the City has not yet reached the projected population in 2023, and the proposed project

[68] City of Anaheim. Housing Element. Chapter 2: Housing Needs Analysis. Figure 2-1 City of Anaheim Population Growth Forecasts, 1980-2030. Website: https://www.anaheim.net/DocumentCenter/View/2138/Z4-2014-2021-Housing-Element-Adopted2414?bidId=. Accessed August 5, 2024.
[69] California Department of Finance. 2024. Population Estimates for Cities, Counties, and the State. Website: https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2024/. Accessed August 5, 2024.
[70] Ibid.
[71] City of Anaheim. 2014. 2014-2021 Housing Element. Website: https://www.anaheim.net/DocumentCenter/View/1867/M-Housing-Element. Accessed August 5, 2024.
[72] 3.41 persons per residential unit * 56 residential units= 191 persons.
[73] Ibid.

would not result in an exceedance of this projection, the population growth resulting from the proposed project can be considered planned growth. Therefore, the proposed project would not induce unplanned population growth either directly or indirectly. Therefore, impacts would be less than significant.

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

No impact. There are no existing residences on-site. This precludes the possibility that the proposed project would displace people or housing. As such, no impact would occur.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.15 Public Services *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:*				
a) Fire protection?	☐	☐	☒	☐
b) Police protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☒	☐
d) Parks?	☐	☐	☒	☐
e) Other public facilities?	☐	☐	☒	☐

Environmental Evaluation

Setting

The information in this section is based, in part, on correspondence with City of Anaheim public service providers, included as Appendix H of this report.

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

a) Fire protection?

Less than significant impact. Anaheim Fire & Rescue provides fire protection services to the project site. Anaheim Fire & Rescue is a full-service organization designed to provide essential public safety and emergency services to the community and its visitors.

Fire stations are strategically located in the City of Anaheim to ensure an efficient demand response to all risk hazards and to maintain recommendations for response times. The project site is currently serviced by Anaheim Fire & Rescue via the existing infrastructure. Additionally, both automatic and mutual aid agreements exist with surrounding jurisdictions. The nearest station to the project site is Fire Station No. 1, located 0.21 mile northeast of the project site at 500 East Broadway. The proposed project would be required to comply with all currently adopted codes and standards at the time of plan submittal and to pay Fire Department development fees. According to correspondence with Anaheim Fire & Rescue, the Fire Department is able to meet the demand of the proposed

project with the existing facilities, equipment, and staff, and would not impair the established response times of the Fire Department.[74]

Because the proposed project would comply with the required codes and standards and the project site is currently serviced by Anaheim Fire & Rescue via the existing infrastructure, impacts associated with fire protection services would be less than significant.

b) Police protection?

Less than significant impact. The Anaheim Police Department provides law enforcement and crime prevention services to the project site. Officers operate out of four stations and patrol an area of 49.7 square miles, divided into four districts. – West, Central, South, and East. The police stations are located as follows:

- Main Station, located at 425 South Harbor Boulevard
- East Station, located at 8201 East Santa Ana Canyon Road
- West Station, located at 320 South Beach Boulevard
- South Station, located at 198 South West Place

The Anaheim Police Department currently employs approximately 386 sworn officers and a support staff of over 170. The ratio of sworn police officers is approximately 2.59 officers per 1,000 population. Police services provided include patrol, investigations, traffic enforcement, traffic control, vice and narcotics enforcement, airborne patrol, crime suppression, community policing, tourist-oriented policing, and detention facilities. Based on consultation with the Anaheim Police Department, the proposed project would not generate demand for additional staffing (Appendix H.2).[75] However, in the future if additional police staff are needed to serve the proposed project, funding for any new personnel needed to maintain acceptable service levels would come from the City of Anaheim's General Fund. Property taxes and other fees assessed for the proposed project would contribute to the General Fund revenues.

The project site is served by the Anaheim Police Department. The nearest police station to the project site is the main station, located 0.48 mile west of the project site at 425 South Harbor Boulevard. Existing Police Department facilities would be sufficient to serve the additional demand associated with the proposed project along with the existing demand of the area. For these reasons, the proposed project would not result in a need for new or expanded police protection facilities. Therefore, impacts would be less than significant.

c) Schools?

Less than significant impact. The proposed project is within the Anaheim Elementary School District boundary. The current district-wide enrollment is 15,191; current capacity is 17,600.[76] The project

[74] Young, Lindsey. Fire Marshal, Anaheim Fire & Rescue. Personal correspondence: email, December 20, 2023.
[75] Berger, Mark. Training Detail, Anaheim Police Department. Personal correspondence: email. January 18, 2024.
[76] Vasquez, Isela. Senior Director, Anaheim Elementary School District. Personal communication: email. January 11, 2024.

site is within the enrollment boundaries of Jefferson Elementary School. Jefferson Elementary School is located at 504 East South Street, which is 0.41 mile southeast of the project site.

Thomas Jefferson Elementary School has a current enrollment of 507 students in grades K-6 for the 2023-2024 school year.[77] Current student generation factors used by the Anaheim Elementary School District are 0.23 per unit for multi-family units. Based on a generation rate of 0.23 students per unit, the proposed project would generate 13 students in grades K-6. The increase of students as a result of the proposed project would not cause the elementary school district to exceed the enrollment capacity; therefore, the proposed project would not significantly impact elementary school services. Furthermore, the proposed project would be required to pay the current school district development fees for multi-family attached housing.

The proposed project is within the Anaheim Union High School District. The current district total enrollment is 27,040 students. Student generation factors are 0.2185. Based on these student generation factors; the proposed project would generate 13 students in South Junior High School and Katella High School. The Anaheim Union High School District would be able to accommodate the anticipated student growth from the proposed project.[78] Furthermore, the proposed project would be required to pay the current development impact fees for residential and commercial space. Payment of the fees would satisfy the requirements of AB 2926 and SB 50 to offset impacts to school services. Therefore, impacts would be less than significant.

d) Parks?

Less than significant impact. The City of Anaheim's Citywide standard of parkland is 2 acres per 1,000 residents. Further discussed in Section 2.16, Recreation, the City currently does not meet its parkland standard.[79] The project site is not located within a Park Deficiency Area (defined as areas outside of a 0.5-mile radius of a public park), according to the General Plan Green Element Figure G1.[80] The proposed project would bring new residents, which would create additional demand on park and recreational facilities. Center Greens Park, located at 305 East Broadway, is 0.15 mile north of the project site. Center Greens Park is 3.5 acres and currently under major renovation and would be completed in the summer of 2024. Recreational amenities include a tot lot, youth challenge course, skate park, basketball court, landscaping, fitness trails, butterfly garden, shaded community plaza, and other amenities (Appendix H.2).[81] The City of Anaheim has adopted a park in lieu fees resolution. The proposed project would comply with the impact fees for the proposed residential units, as discussed in further detail in Section 2.16, Recreation.

According to the City of Anaheim Development Impact Fee Justification Study, impact fees are used for the acquisition, installation, and construction of public facilities identified on a needs lists and appropriate administrative costs to mitigate the direct and cumulative impacts of new development

[77] Vasquez, Isela. Senior Director, Anaheim Elementary School District. Personal communication: email. January 11, 2024.
[78] Matsuda, Michael. Superintendent, Anaheim Union High School District. Personal communication: email. December 20, 2023.
[79] Jiminez, Jose. Parks Manager, Community Services Department. Personal communication: email. January 31, 2024.
[80] City of Anaheim. May 2004. City of Anaheim General Plan. Green Element. Website: https://www.anaheim.net/DocumentCenter/View/9521/F-Green-Element?bidId=. Accessed August 5, 2024.
[81] City of Anaheim. 2020. Community Services Spotlight. Center Greens. Website: https://www.anaheim.net/CivicAlerts.aspx?AID=1753. Accessed August 5, 2024.

in the City. Fees are based on an equivalent development unit method to fairly allocate costs to new development and determine the appropriate fee levels that would provide a source of funds to pay. Therefore, with payment of the park in lieu fees, impacts would be less than significant.

e) Other public facilities?

Less than significant impact. The Anaheim Public Library system includes a central library and six branch libraries, along with the Anaheim Heritage Center, Books on the Go! (self-service kiosk at Anaheim Regional Transportation Intermodal Center), and a mobile library and science, technology, engineering, the arts, and math (STEAM) van. Central Library, which is located at 500 West Broadway, would serve the proposed project. Central Library is located 0.50 mile west of the project site. Additionally, Euclid Library is 2.13 miles southwest of the project site.

Population growth affects online library resources because the library's service area is the basis for licensing fees for databases, e-books, and other digital resources. With additional residents to serve, the proposed project would reduce the overall availability per capita of books, media, computers, and library public service space. Therefore, in order to maintain current per capita levels and licensing agreements, the City would need to provide additional physical and virtual resources to the Anaheim library system.[82]

The proposed project's impacts to the overall availability per capita of books, media, computers, and library public service space would not result in significant physical or environmental impacts, as the population growth resulting from the proposed project is within current City projections. Therefore, project-related impacts to library facilities would be less than significant, and no mitigation measures are required.

Mitigation Measures

None required.

[82] Edelblute, Thomas. Anaheim Public Library. Personal correspondence: email. March 13, 2024.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.16 Recreation				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Environmental Evaluation

Setting

The City of Anaheim owns and operates 60 parks totaling approximately 800 acres. Park facilities include neighborhood, community, and special use parks, and riding and hiking trails.[83] The City currently maintains park dedication standards of 2 acres of parkland for each 1,000 residents.[84] Depending on the magnitude of residential development, the dedication may be in the firm of direct dedication of improved land, the payment of fees in lieu of dedication, or a combination of both. The City has a park dedication ordinance, and every year the City Council adopts a resolution setting park dedication fees.[85]

The nearest park to the proposed project is Center Greens Park, located at 305 East Broadway, which is 0.15 mile north of the project site. Center Greens Park opened in 2022 and is 3.5 acres. Center Greens Park is currently under major renovations and would be completed in the summer of 2024. Recreational amenities include a tot lot, youth challenge course, skate park, basketball court, landscaping, fitness trails, butterfly garden, shaded community plaza, and other amenities.[86]

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

Less than significant impact. The proposed project would include up to 56 3-story condominium townhomes. The City has an estimated population of 328,580 as of January 2, 2023. The

[83] City of Anaheim. 2022. Parks & Facilities. Website: https://www.anaheim.net/916/Parks-Facilities. Accessed June 10, 2024.
[84] City of Anaheim. 2018. Anaheim Parks Plan. May 15. Website: https://www.anaheim.net/DocumentCenter/View/33927/AnaheimParks-Plan---Final---5-21-2018_low-res. Accessed August 5, 2024
[85] City of Anaheim. 2004. Anaheim General Plan/Zone Code Update EIR. Website: https://www.anaheim.net/DocumentCenter/View/2196/514-Recreation-?bidId=. Accessed August 5, 2024.
[86] City of Anaheim. 2020. Community Services Spotlight. Website: https://www.anaheimnet/CivicAlerts.aspx?aid=1753. Accessed August 5, 2024.

approximate persons per household as of 2022 is estimated to be 3.02 persons.[87] As discussed previously in Section 2.14, Population and Housing, given the proposed project would develop up to 56 dwelling units, the proposed project is estimated to generate up to 170 new residents, which would increase the demand on existing neighborhood and regional parks.[88]

The proposed project would provide 11,392 square feet of total qualified recreation-leisure area, which consists of 9,552 square feet of common area and 1,840 square feet of private areas. The required recreation-leisure area for 56 units is 11,200 square feet.[89] However, the proposed project would not develop additional parks. The proposed project would comply with the City's park dedication ordinance, which requires developers to develop additional parkland or pay in lieu fees for each residential unit. Therefore, with payment of the park in lieu fees, impacts would be less than significant.

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

No impact. The proposed project would provide common space and amenity areas throughout the project site, landscaping, and a recreational amenity area within the project site. However, the proposed project does not propose the construction or expansion of public recreational facilities. Therefore, as discussed above, the proposed project would be required to develop additional parkland or pay in lieu fees.

The proposed project would result in up to 56 new residential units and up to 170 new residents, which would place additional demand on the existing parks, including the nearest parks, Farmers Park and Center Greens Park. The City currently does not meet its parkland standard.[90] The proposed project would comply with the City's park dedication ordinance and pay in lieu fees to the City. With payment of the required fees, and inclusion of the proposed project's recreational-leisure space, the proposed project would not result in adverse physical impacts associated with such facilities. There would be no impact**.**

Mitigation Measures

None required.

[87] City of Anaheim. 2022. Population and Housing Estimates for Cities, Counties, and the State. Website: https://dof.ca.gov/forecasting/demographics/estimates/estimates-e5-2010-2021/. Accessed August 5, 2024.
[88] 3.02 persons per residential unit*56 residential units= 169.12 persons.
[89] 200 square feet required per unit.
[90] Jiminez, Jose. Parks Manager, Community Services Department. Personal communication: email. January 31, 2024.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.17 Transportation *Would the project:*				
a) Conflict with a program plan, ordinance or policy of the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

Environmental Evaluation

Setting

The analysis contained in this section is partially based on the Traffic Analysis prepared for the proposed project by Urban Crossroads on January 5, 2024, and the VMT Screening Evaluation prepared by Urban Crossroads on November 22, 2023, both included in Appendix I. The City's applicable project-specific thresholds are described below.

Changes to the CEQA Guidelines were adopted in December 2018 to implement SB 743. CEQA Guideline 15064.3, which describes criteria for evaluating a project's transportation impacts, provides that VMT is generally "the most appropriate measure of transportation impacts," and that except for roadway capacity projects, a project's effect on traffic delays "shall not constitute a significant environmental impact." These provisions went into effect July 1, 2020. The VMT Analysis evaluated the applicable City of Anaheim screening thresholds to determine whether the proposed project would be expected to create impacts related to VMT. Although Level of Service (LOS) by itself is no longer a potentially significant impact under CEQA, LOS is discussed in the City's Congestion Management Program (CMP) and is provided here as an impact analysis for consistency with the City's CMP requirements.

Would the project:

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

Less than significant impact. The Traffic Analysis analyzed potential circulation system deficiencies that recommend improvements to achieve acceptable operations consistent with General Plan LOS

goals and policies. The General Plan requires a LOS of D or greater at intersections and C or better at arterial links.

The Traffic Analysis evaluated the LOS at the study area interactions and determined that they would continue to operate at an acceptable LOS during the peak hours under all analysis scenarios, including Existing Plus Approved Plus Ambient Growth (2027), Existing Plus Approved Plus Ambient Growth (2027) Plus Project traffic conditions, Future Conditions (2027) With Project, and General Plan Buildout With Project. Therefore, the proposed project is anticipated to be consistent with the General Plan. Thus, the proposed project would comply with the applicable programs and plan applicable to transportation.

There are existing pedestrian facilities within the study area along Anaheim Boulevard, South Philadelphia Street, South Olive Street, and portions of East Santa Ana Street in the vicinity of the project site. Field observations and traffic counts conducted in May 2023 indicate moderate pedestrian and bicycle activity in the vicinity of the project site due to the proximity of the adjacent businesses.

There are existing Class III bike routes on Anaheim Boulevard south of Santa Ana Street, and on Santa Ana Street west of Anaheim Boulevard. There is a planned Class III bike route along the proposed project's frontage on South Olive Street and East Santa Ana Street east of Anaheim Boulevard. Class III bike lands are signed shared, on-road bike routes without dedicated bike lane striping. There is a planned Class II bike lane on Anaheim Boulevard in the vicinity of the project. Class II bike lanes are signed and striped bike lanes on the roadway.

There are existing pedestrian facilities along Anaheim Boulevard, Philadelphia Street, Olive Street, and along portions of Santa Ana Street in the vicinity of the project site. Field observations and traffic counts conducted in May 2023 indicate moderate pedestrian and bicycle activity in the vicinity of the project site due to the proximity of the adjacent businesses.

The study area is currently served by OCTA, a public transit agency serving various jurisdictions within Orange County. The closest OCTA transit route runs along Anaheim Boulevard (near East Santa Ana Street). This route could potentially serve the proposed project. Transit service is reviewed and updated by OCTA periodically to address ridership, budget, and community demand needs. Changes in land use can affect these periodic adjustments, which may lead to either enhanced or reduced service where appropriate. The proposed project would not result in any adverse impacts to public transit, bicycle, or pedestrian facilities; therefore, impacts would be less than significant.

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

Less than significant impact. The City of Anaheim developed and adopted the City of Anaheim Traffic Impact Analysis Guidelines for CEQA Analysis, (City Guidelines). The City Guidelines identify three types of project screening that can be applied to effectively screen projects from a project-level VMT Analysis. A project only needs to fulfill one of the screening types to qualify for screening. The City of Anaheim VMT screening types, as described within the City Guidelines, are listed below:

- Type 1: Transit Priority Area (TPA) Screening
- Type 2: Low VMT Area Screening
- Type 3: Project Type Screening

Type 1. TPA Screening

The City Guidelines state that those projects located within a TPA (i.e., within 0.5 mile of an existing "major transit stop" or an existing stop along a "high quality transit corridor") may be presumed to have a less than significant impact absent substantial evidence to the contrary. However, the presumption may not be appropriate if a project:

- Has a floor area ratio (FAR) of less than 0.75;
- Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking);
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization); or
- Replaces affordable residential units with a smaller number of moderate- or high-income residential units.

According to the TPA Map provided in the City Guidelines, the proposed project is located within 0.5 mile of an existing "major transit stop" or an existing stop along a "high quality transit corridor." Upon further investigation of OCTA Bus Routes 43 and 47 that serve the project area, the frequency of service is greater than the 15-minute interval threshold and can no longer be considered a TPA.

Type 2: Low VMT Area Screening

Residential and office projects located within a low VMT-generating area may be presumed to have a less than significant impact absent substantial evidence to the contrary. The City Guidelines identify a low-VMT-generating zone as one that produces VMT per service population at least 15 percent below the County average. According to the VMT map provided in the City Guidelines, the proposed project is in a low-VMT-generating zone. Although the project would include a change of zone to increase residential density, the proposed residential land use would be consistent with the General Plan's residential land use assumptions. Therefore, the proposed project meets the Low VMT Area screening criteria.

Type 3: Project Type Screening

The City Guidelines identify local serving retail under 50,000 square feet, local serving essential services, (e.g., day care centers, public schools, religious assembly uses, etc.), and projects generating less than 110 daily vehicle trips as presumed to have less than significant VMT impact absent substantial evidence to the contrary. The proposed project does not intend to develop any local serving uses and is anticipated to generate 368 two-way trips per day, which is above the 110 daily trip threshold. Therefore, project type screening criteria is not met.

Conclusion

The proposed project is found to meet the Low VMT Area screening criteria and presumed to have a less than significant VMT impact. Thus, the proposed project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b); therefore, impacts would be less than significant.

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

Less than significant impact. Vehicles would access the project site via four driveways along the alleyway immediately north of the project site. An internal private roadway system would provide two-way access to the surface parking lots and to the parking garages. The proposed project driveway and internal roadways would be developed to comply with the City Building Division and Anaheim Fire & Rescue Department standards. The proposed project would include curb, gutter, sidewalk, and landscaping improvements. On-site traffic signing and striping would be consistent with the California Manual on Uniform Traffic Control Devices (CA MUTCD) and in conjunction with detailed construction plans for the project site. Sight distance at each access point would be reviewed with respect to standard Caltrans and City of Anaheim sight distance standards. The proposed project would develop 56 3-story condominium townhomes ranging in size from approximately 1,200 to 1,800 square feet and would not include the use of any incompatible vehicles or equipment, such as farm equipment. The proposed project is surrounded by commercial, residential, and industrial uses. Therefore, the proposed project's residential development would be compatible with the surrounding uses. Thus, the proposed project would not substantially increase hazards due to design or incompatible uses. Impacts would be less than significant, and no mitigation is required.

d) Result in inadequate emergency access?

Less than significant impact. The proposed project would provide emergency access via four driveways along the alleyway immediately north of the project site. The proposed project has been designed such that fire services can access the site from any of the public streets or the existing alley with a minimum of 150 feet of hose pull to cover the entirety of each building. Existing hydrants are located adjacent to the site on South Claudina Street and South Philadelphia Street as well as diagonally across East Santa Ana Street on South Olive Street. The proposed project would be compliant with the City Building Division and Anaheim Fire & Rescue standards. To ensure compliance, Anaheim Fire & Rescue would review project plans for final approval prior to issuance of a Building Permit. Further, it is not anticipated that construction of the proposed project would require the closure of any public roadways. Temporary construction activities would not impede the use of the road for emergencies or access for emergency response vehicles. Thus, impacts would be less than significant, and no mitigation is required.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.18 Utilities and Service Systems *Would the project:*				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Environmental Evaluation

Setting

According to the City's 2020 Urban Water Management Plan (UWMP), the City relies on a combination of imported water, local groundwater, and a small amount of recycled water to meet its water needs. The City works together with two primary agencies, Metropolitan and the OCWD, to ensure a reliable water supply that would continue to serve the City during periods of drought and water shortages.

The City's Sewer and Storm Drain Maintenance Division is responsible for maintenance of the City's sewer and storm drain lines. The proposed project is within the Central Anaheim Master Plan of Sanitary Sewers (CAMPSS), adopted in December 2017. The CAMPSS study area consists of approximately 10,627 gross acres and a cumulative total of 23,777 linear feet of sewer pipelines that

serve a population of approximately 134,000 people.[91] The project site drains into the trunk sewer on Ball Road and Walnut Street.[92]

As discussed in Section 1.4, Project Description, water service for the proposed project would be provided by Anaheim Public Utilities Water Service. The proposed project would connect to existing domestic water lines within East Santa Ana Street through four 6-inch lines to the site through the drive aisles. The proposed project would connect to existing water and sanitary sewer lines and would include the installation of stormwater management systems on-site. Stormwater would drain to the new private motor courts where it would be collected into perforated pipes that will use infiltration to treat stormwater.

There are two 1-inch service lines on South Philadelphia Street and South Claudina Street that would be cut and capped.

The project is proposed to be all-electric (no gas) and would be served by two new three-phase transformers. An existing vault on the eastern portion of the project site would be removed before commencing any site development. Electricity would connect at the existing underground vault on East Santa Ana Street.

Telecommunication would connect to existing lines running in the existing alley on the proposed project's north property line.

The proposed project would provide two trash enclosures on the north side of the project site along the existing alley.

Would the project:

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

Less than significant impact. The current easement for underground and related electrical will be removed and a new storm drain system is proposed connecting from the concrete catch basin with storm filter then to an access manhole and then to the underground infiltration gallery.[93]

The proposed project would be entirely electric, with no natural gas utilities, and would be served by two new three-phase transformers. An existing vault on the eastern portion of the project site would be removed before commencing any site development. Electricity would connect at the existing underground vault on East Santa Ana Street.

The project site is currently fully developed and served by telecommunications infrastructure. The proposed project would connect to the existing telecommunications infrastructure. Therefore, the

[91] City of Anaheim. 2017. Central Anaheim Master Plan of Sanitary Sewers, First Revision. December 2017.
[92] Ibid.
[93] Moran Consulting Corporation (Moran Consulting). 2024. Priority Project Preliminary Water Quality Management Plan, 2756 & 375 E. Santa Ana Street, Anaheim, CA 92805. August 5, 2024.

proposed project would not require the installation or development of new or improved telecommunications facilities such that environmental impacts would occur.

As the proposed storm drain system would be designed consistent with the WQMP, the addition of the new storm drain would not cause significant environmental effects. Further, the new transformers would connect to the existing underground vault and would not cause significant environmental effects. Impacts would be less than significant.

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. As discussed above, the proposed project would connect to existing water lines and system. The 2020 UWMP includes a supply and demand assessment for projected years between 2025 and 2045 for normal year, single dry year, and multiple years. For each scenario the UWMP indicates that the City would be able to meet the projected water demand based on the available supply. The demands are expected to be met with groundwater, imported water, and recycled water supplies.[94] The UWMP accounts for projected water demand based on water consumption by single- and multi- family residences, commercial, and institutional/government customers. The UWMP also accounts for projected land use, population, economic growth, and future conservation.[95]

The UWMP indicates that the City would have sufficient water supply for normal year, single dry year, and multiple years. Based on the City's Administrative Procedures and Design Guidelines, estimated water generation for a multi-family development is estimated to be 300 gallons per day (gpd) per unit. for the 56 units under the proposed project, this would result in 16,800 gallons or 0.05 acre-feet of water. as noted in the UWMP, the projected Citywide water use in 2025 is 58,758 acre-feet. Therefore, the small projected water use of the proposed project can be reasonably considered a part of the existing demand projections in the UWMP. As such, the proposed project would not significantly impact water supplies. Impacts would be less than significant.

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. As discussed above, the proposed project would connect to existing sanitary sewer lines. The City's Sewer and Storm Drain Maintenance Division is responsible for maintenance of the City's sewer and storm drain lines. The proposed project is within the CAMPSS study area, which consists of approximately 10,627 gross acres and a cumulative total of 23,777 linear feet of sewer pipelines that serve a population of approximately 134,000 people.

The City recycles a small portion of wastewater at the downtown Water Recycling Demonstration Facility; however, the City sends most of its collected wastewater to the Orange County Sanitation District (OC San) for treatment and disposal. Municipal Service Review prepared for OC San in

[94] City of Anaheim. 2021. 2020 Urban Water Management Plan. June 2021.
[95] Ibid.

2020.[96] The purpose of the review was—in part—to review and study future growth in the service area and to determine whether OC San can efficiently, equitably, and reliably provide services. At the time of the review OC San was providing service to approximately 2.6 million people, and it was projected that by 2040 the OC San service area would include 2.8 million residents and 940,653 housing units. The review determined that OC San existing and planned operations and infrastructure are expected to meet service demands.[97]

Based on the Municipal Service Review conclusions, OC San would have adequate capacity to serve the wastewater demands of the proposed project. The impact would be less than significant.

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. Republic Services is a private recycling and nonhazardous solid waste hauler and provides solid waste services to the City. Republic Services collects solid waste for all residential, commercial, and industrial waste and recycling services. Solid waste is disposed of in Orange County landfills. Currently, there are three active landfills that are owned and operated by the County, including Frank R. Bowerman Landfill in Irvine, Olinda Alpha Landfill in Brea, and Prima Deshecha Landfill in San Juan Capistrano. In order to ensure that the maximum permitted daily tonnage at a particular landfill is not exceeded, refuse trucks may have to transport material to one or the other.[98] The majority of this waste is taken to the Olinda Alpha Sanitary Landfill, which is located in the City of Brea. The Olinda Alpha Landfill is the closest facility to the City and would likely be the solid waste facility most often receiving waste from the project site.[99] According to the California Department of Resources Recycling and Recovery (CalRecycle) Solid Waste Information System (SWIS), the Olinda Alpha Sanitary Landfill has a maximum daily capacity of 8,000 tons per day and a remaining capacity of 17,500,000 cubic yards.

CalRecycle provides a solid waste generation factor to estimate the amount of solid waste generated by residential projects. Using the generation rate of 12.23 pounds (lbs) per household per day for residential development, the proposed project would generate approximately 684.88 lbs per day of solid waste, or approximately 0.34 tons per day (based on 56 townhomes)—which represent less than 1 percent of the maximum daily capacity of the landfill.

Therefore, the Olinda Alpha Landfill would have sufficient capacity to serve the proposed project and solid waste generated during construction and operations would represent a negligible increase compared to the daily permitted tonnage. Additionally, the proposed project would also include recycling programs to reduce solid waste and comply with all applicable regulations for solid waste. The impact would be less than significant, and no mitigation is required.

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[96] Orange County Local Agency Formation Commission (LAFCo). 2020. Municipal Service Review for the Orange County Sanitation District. Final Report. September 9, 2020.

[97] Ibid.

[98] City of Anaheim. 2004. General Plan/Zoning Code Update EIR. Website: https://www.anaheim.net/DocumentCenter/View/2195/513-Public-Services-and-Facilities?bidId=. Accessed March 27, 2024.

[99] California Department of Resources Recycling and Recovery (CalRecycle). 2024. Solid Waste Information System (SWIS). Website: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2757?siteID=2093. Accessed June 4, 2024.

e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

Less than significant impact. The City complies with all federal, State, and local statutes and regulations related to solid waste. Regulations specifically applicable to the proposed project include the California Integrated Waste Management Act of 1989 (AB 939), SB 2202, SB 1016, 2019 CALGreen Section 4.408, and AB 341, which requires multiple-family residential development and commercial uses to implement recycling programs.

In 1989, the Legislature adopted the California Integrated Waste Management Act of 1989 (AB 939), in order to "reduce, recycle, and reuse solid waste generated in the State to the maximum extent feasible." AB 939 established a waste management hierarchy and required that each county prepare a new Integrated Waste Management Plan and each city prepare a Source Reduction and Recycling Element (SRRE) by July 1, 1991. The SRRE is required to identify how each jurisdiction would meet the mandatory State waste diversion goal of 50 percent by and after the year 2000.

SB 2202 made a number of changes to the municipal solid waste diversion requirements under A 939. These changes included a revision to the statutory requirement for 50 percent diversion of solid waste to clarify that local governments shall continue to divert 50 percent of all solid waste on and after January 1, 2000.

SB 1016 introduced a per capita disposal measurement system that measures the 50 percent diversion requirement using a disposal measurement equivalent. The Bill repealed the State Water Board 2-year process, requiring instead that the State Water Board make a finding whether each jurisdiction was in compliance with the Act's diversion requirements for calendar year 2006 and to determine compliance for the 2007 calendar year and beyond, based on the jurisdiction's change in its per capita disposal rate. The State Water Board is required to review a jurisdiction's compliance with those diversion requirements in accordance with a specified schedule, which is conditioned upon the State Water Board finding that the jurisdiction complies with those requirements or has implemented its SRRE and household hazardous waste element. The Bill requires the State Water Board to issue an order of compliance if the State Water Board finds that the jurisdiction has failed to make a good faith effort to implement its SRRE or its household hazardous waste element, pursuant to a specified procedure. The per capita disposal rate is a jurisdiction-specific index, which is used as one of several "factors" in determining a jurisdiction's compliance with the intent of AB 939 and allows CalRecycle and jurisdictions to set their primary focus on successful implementation of diversion programs.

SB 1383 requires counties to take the lead collaborating with the jurisdictions located within the county in planning for the necessary organic waste recycling and food recovery capacity needed to divert organic waste from landfills into recycling activities and food recovery organizations. California has a 2025 goal to redirect to people in need 20 percent of edible food currently thrown away.[100]

[100] California Department of Resources Recycling and Recovery (CalRecycle). 2024. Capacity Planning. Website: https://calrecycle.ca.gov/organics/slcp/capacity planning/. Accessed on March 27, 2024.

CALGreen Section 4.408 requires preparation of a Construction Waste Management Plan that provides an overview of ways in which the applicant would recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition debris. During the construction phase, the proposed project would be required to comply with CALGreen through the recycling and reuse of at least 65 percent of the nonhazardous construction and demolition debris from the project site.

Participation in the City's recycling programs during project construction and operation, including CalRecycle's requirements, would ensure that the proposed project would not conflict with federal, State, and local statutes and regulations related to solid waste. Additionally, solid waste would be disposed of at existing Orange County Waste and Recycling landfills. Disposal of solid waste would comply with all federal, State, and local statutes and regulations related to solid waste. During operation, the proposed project would include receptacles for recyclables and garbage. Thus, impacts would be less than significant, and no mitigation is required.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.19 Wildfire *If located in or near State Responsibility Areas or lands classified as very high fire hazard severity zones, would the project:*				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Environmental Evaluation

Setting

The CAL FIRE FHSZ Map indicates that the project site is not within a State Responsibility Area (SRA). The closest SRA is 8 miles southeast of the project site.[101] The site is located in an LRA in a non-Very High FHSZ.[102]

Would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

No impact. The City of Anaheim has emergency evacuation zones for the eastern portion of the City, where there is more open space and a greater wildland fire hazard risk.[103] According to the City's Know Your Way Evacuation Zones web page, the project site is located outside of the evacuation zones area and the streets surrounding the proposed project would not be used for this evacuation program. The project site is not located in any of the evacuation zones because it is near the western portion of the City, where it is flatter and more urbanized, and there are fewer fire hazards.

[101] California Department of Forestry and Fire Protection (CAL FIRE). 2022. State Responsibility Area (SRA) Viewer. Website: https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=468717e399fa4238ad86861638765ce1. Accessed March 20, 2024.
[102] California Department of Forestry and Fire Protection (CAL FIRE). 2022. Very High Fire Hazard Severity Zones in LRA As Recommended by CAL FIRE. Website: https://osfm.fire.ca.gov/media/5880/c30_anaheim_vhfhsz.pdf. Accessed March 20, 2024.
[103] City of Anaheim. Know Your Way Evacuation Zones. Website: https://www.anaheim.net/6063/Know-Your-Way-Evacuation-Zones. Accessed March 20, 2024.

Furthermore, although temporary construction activities may result in partial closure of roads surrounding the project site, the proposed project would not impede use of the road for emergencies or access for emergency response vehicles. Therefore, the proposed project would not result in inadequate emergency access.

As described above, the project site is not located in a SRA. It is located within an LRA in a non-Very High FHSZ. No impact would occur.

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?

No impact. The project site is located in an urbanized, flat area and does not have features with the potential to exacerbate wildfire. The site and its surrounding area have no history of wildfire.[104] As described above, the project site is not located in an SRA. It is located within an LRA in a non-Very High FHSZ. Therefore, the proposed project would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. No impact would occur.

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

No impact. The project site is located in an urbanized area of the City and would connect to existing infrastructure that currently serves the site and the surrounding area. The project would not include the installation of infrastructure that would exacerbate wildfire risk. As described above, the project site is located within an LRA in a non-Very High FHSZ. Therefore, the proposed project would not exacerbate fire risk. No impact would occur**.**

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

No impact. The project site is flat and is not located within an area identified as having a potential for landslides by the California Geological Survey.[105] As described above, the project site is not located in an SRA. It is located within an LRA in a non-Very High FHSZ. The proposed project does not have other features with the potential to exacerbate wildfire, downstream flooding, or landslide risks. Further, as discussed in Section 2.10, the proposed project is not located in an area subject to flood hazards, and the proposed project would not contribute to runoff or flooding. No impact would occur.

Mitigation Measures

None required.

[104] California Department of Forestry and Fire Protection (CAL FIRE). 2022. California Fire Perimeters through 2021. Website: https://calfire-forestry.maps.arcgis.com/apps/mapviewer/index.html?layers=e3802d2abf8741a187e73a9db49d68fe. Accessed March 20, 2024.

[105] California Geological Survey, California Department of Conservation. Geologic Hazards. Website: https://maps.conservation.ca.gov/geologichazards/. Accessed March 20, 2024.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.20 Mandatory Findings of Significance				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Environmental Evaluation

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

Less than significant with mitigation incorporated. Based on the analysis provided in Section 2.4, Biological resources, the proposed project would have a less than significant impact on candidate, sensitive, or special-status species through compliance with all federal and State laws. The proposed project would have no impact related to riparian habitat or other sensitive natural communities. Impacts related to State or federally protected wetlands would be less than significant through compliance with applicable water quality laws and regulations, including the CWA and Porter-Cologne Water Quality Control Act, and the proposed project's impacts to nesting birds and wildlife movement would be less than significant through adherence to MBTA, California Fish and Game Gode, and Title 24 standards and requirements. Impacts related to the removal of street trees or specimen trees would be less than significant through adherences to the provisions of Municipal

Code. Finally, the proposed project would have no impact related to conflicts with adopted federal, State, or local habitat conservation plans.

Based on the analysis provided in Section 2.5, Cultural resources, the proposed project's impacts related to historical resources would be less than significant with implementation of MM CUL-1. A n SCCIC records search indicated that there are 17 historic resources within a 0.5-mile radius of the project, none of which are located within the project boundaries. Additionally, the properties located 275-375 East Santa Ana Street were found not eligible under all State and local designation criteria. While unlikely, subsurface construction activities always have the potential to destroy or damage previously undiscovered historical resources. Implementation of MM CUL-1 would ensure that potential impacts on historic resources are reduced to a less than significant level. Additionally, there are no known archaeological resources on the project site, but there is always a possibility that subsurface excavation could result in the discovery of previously undiscovered prehistoric archaeological resources. Implementation of MM CUL-1 would ensure that potential impacts on prehistoric archaeological resources are reduced to a less than significant level.

Additionally, although there are no known human remains or cemeteries within or near the project site, there is always a potential that subsurface construction activities, such as grading or trenching, could potentially damage or destroy previously undiscovered human remains. CEQA Guidelines Section 15064.5, Health and Safety Code Section 7050.5, and Public Resources Code Sections 5097.94 and 5097.98 specifies the procedures to follow in the event human remains are uncovered. Compliance with required guidelines and statutes would reduce potential impacts on human remains to a less than significant level. In addition to reducing impacts on historic and prehistoric resources, implementation of MM CUL-2, MM TCR-1, MM TCR-2, and MM TCR-3 for additional procedures upon the accidental discovery of human remains, TCR objects, or human remains and associated funerary or ceremonial objects would also reduce any impacts on TCRs.

Based on the discussion provided above, compliance with required guidelines and statutes and implementation of the mitigation measures, the proposed project would not substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. Therefore, impacts would be less than significant with compliance with existing regulations and incorporation of MM CUL-1, MM CUL-2, MM TCR-1, and MM TCR-2.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less than significant impact. The analysis in this Draft IS/MND includes a review of the proposed project's potential impacts regarding air quality, biological resources, cultural resources, parks and recreation facilities, noise, and transportation, among other environmental issue areas. As presented

throughout this Draft IS/MND, the proposed project's cumulative impacts would either be less than significant with mitigation incorporated, less than significant, or there would be no impacts.

Section 2.3, Air Quality, analyzed cumulative impacts related to regional criteria pollutant emissions and determined that these cumulative impacts would be less than significant. The region is currently nonattainment for ozone, PM_{10}, and $PM_{2.5}$. As discussed in Section 2.3, the proposed project's regional construction emissions would not exceed SCAQMD regional significance thresholds for VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$. Therefore, the cumulative impact of the proposed project's construction emissions on regional air quality would be less than significant. Furthermore, Section 2.3 determined that the proposed project's regional operations emissions would not exceed SCAQMD regional significance thresholds for VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$. Therefore, the cumulative impact of the proposed project's operations emissions on regional air quality would be less than significant, and no mitigation measures are needed. Section 2.13, Noise, determined that project-related traffic would have no potential to substantially contribute to any cumulatively considerable increases in future roadside ambient noise levels, and that no mitigation measures are needed. Section 2.15, Public Services, determined that the payment of park in lieu fees would mitigate the direct and cumulative impacts of new development in the City, and that no mitigation measures are needed.

As discussed throughout this Draft IS/MND, the proposed project's cumulative impacts would be less than significant. No additional mitigation measures would be required to reduce cumulative impacts. Therefore, the proposed project would contribute to less than significant cumulative impacts.

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

Less than significant with mitigation incorporated. Based on the discussion provided in the Project Description and the analysis presented in Sections 2.1 through 2.19 of this Draft IS/MND, the proposed project would not cause substantial adverse effects on human beings, either directly or indirectly, because the proposed project's potential impacts would be mitigated to a less than significant level. Therefore, with implementation of MM CUL-1, MM CUL-2, MM TCR-1, MM TCR-2, MM GEO-1, and MM GEO-2, the proposed project would not result in substantial adverse effects on human beings. Impacts would be less than significant with mitigation incorporated.

Mitigation Measures

Implementation of MM CUL-1, MM CUL-2, MM TCR-1, MM TCR-2, MM TCR-3, MM GEO-1, and MM GEO-2.

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