

**Initial Study/
Mitigated Negative Declaration
3175 West Ball Road Apartments Project
(Development Project No. 2016-00074)**

Prepared for:

City of Anaheim

Planning and Building Department, Planning Services Division
200 South Anaheim Boulevard
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JULY 2020

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
AESD	Anaheim Elementary School District
AFR	Anaheim Fire and Rescue
Alquist–Priolo Act	Alquist–Priolo Earthquake Zoning Act
ALUC	Airport Land Use Commission
APD	Anaheim Police Department
AQMP	Air Quality Management Plan
AUHSD	Anaheim Union High School District
Basin	Orange County Groundwater Basin
BMP	best management practice
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CH ₄	methane
City	City of Anaheim
CNEL	community noise equivalent level
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent
dB	decibel
dBA	A-weighted decibel scale
DMA	drainage management area
EIR	environmental impact report
EO	Executive Order
EPA	U.S. Environmental Protection Agency
EV	electric vehicle
GHG	greenhouse gas
GHG Reduction Plan	Greenhouse Gas Reduction Plan
GWP	global warming potential
I	Interstate
IS/MND	Initial Study/Mitigated Negative Declaration
L _{dn}	day–night average noise level
L _{eq}	equivalent noise level over a given period
L _{max}	maximum noise levels
LOS	level of service
LST	localized significance threshold
Metropolitan	Metropolitan Water District of Southern California
mgd	million gallons per day
MM-	Mitigation Measure
MT	metric tons

Acronym/Abbreviation	Definition
N ₂ O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NO ₂	nitrogen dioxide
NO _x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
O ₃	ozone
OCWD	Orange County Water District
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to 10 microns
PM _{2.5}	particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
PPV	peak particle velocity
Project Applicant	Sarkis Tatarian
Proposed Project	proposed 3175 West Ball Road Apartments Project
RCNM	Roadway Construction Noise Model
RHNA	Regional Housing Needs Assessment
RTP	Regional Transportation Plan
SARWQCB	Santa Ana Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCS	Sustainable Communities Strategy
SLF	Sacred Lands File
SO ₂	sulfur dioxide
SO _x	sulfur oxides
SR	State Route
SRA	Source Receptor Area
STC	Sound Transmission Class
SWPPP	stormwater pollution prevention plan
TAC	toxic air contaminant
TCR	tribal cultural resource
TIA	Traffic Impact Analysis
TIA Guidelines	Traffic Impact Analysis Guidelines for California Environmental Quality Act Analysis
UST	underground storage tank
V/C	volume to capacity
VMT	vehicle miles traveled
VOC	volatile organic compound
WQMP	Water Quality Management Plan

1 Introduction

1.1 Project Overview

The City of Anaheim (City) received a development application from Sarkis Tatarian (Project Applicant) requesting approval of the following discretionary actions for the proposed 3175 West Ball Road Apartments Project (Proposed Project):

- General Plan Amendment (GPA2016-00510) to change the Project Site's General Plan Land Use Designation from General Commercial to Medium Density Residential
- Zoning Reclassification (RCL2016-00297) to change the Project Site's zoning from the General Commercial (C-G) Zone to the Multiple-Family Residential (RM-4) Zone
- Administrative Adjustment (ADJ2020-00444) to allow reduced landscape setbacks of 16-feet adjacent to an arterial highway where 20-feet would be required; and an interior structural setback of 18-feet where 20-feet would be required.

The Proposed Project would involve the construction of an 11-unit, 3-story apartment building, along with associated on-site and site-adjacent improvements such as parking, pedestrian walkways, and landscape areas.

The Proposed Project is the subject of analysis in this document pursuant to the California Environmental Quality Act (CEQA). In accordance with CEQA Guidelines, Section 15367, the City is the lead agency with principal responsibility for considering the Proposed Project for approval (14 CCR 15000 et seq.).

1.2 California Environmental Quality Act Compliance

CEQA, a statewide environmental law contained in California Public Resources Code, Sections 21000–21177, applies to most public agency decisions to carry out, authorize, or approve actions that have the potential to adversely affect the environment. The overarching goal of CEQA is to protect the physical environment. To achieve that goal, CEQA requires that public agencies identify the environmental consequences of their discretionary actions and consider alternatives and mitigation measures that could avoid or reduce significant adverse impacts when avoidance or reduction is feasible. It also gives other public agencies and the public an opportunity to comment on the information. If significant adverse impacts cannot be avoided, reduced, or mitigated to below a level of significance, the public agency is required to prepare an environmental impact report (EIR) and balance the project's environmental concerns with other goals and benefits in a statement of overriding considerations.

1.3 Preparation and Processing of this Initial Study/Mitigated Negative Declaration

The City's Planning and Building Department, Planning Services Division, directed and supervised the preparation of this Initial Study/Mitigated Negative Declaration (IS/MND). Although prepared with assistance from the consulting firm Dudek, the content contained within and the conclusions drawn by this IS/MND reflect the independent judgment of the City, as the Lead Agency.

1.4 Initial Study Checklist

Dudek, under the City's guidance, prepared the Proposed Project's Environmental Checklist (i.e., Initial Study) per CEQA Guidelines, Sections 15063–15065. The CEQA Guidelines include a suggested checklist to indicate whether a project would have an adverse impact on the environment. The checklist is in Section 3, Initial Study, of this document. Following the Environmental Checklist, Sections 3.1 through 3.21 include an explanation and discussion of each significance determination made in the checklist for the Proposed Project.

For this IS/MND, the following four possible responses to each individual environmental issue area are included in the checklist:

1. Potentially Significant Impact
2. Less-Than-Significant Impact with Mitigation Incorporated
3. Less-Than-Significant Impact
4. No Impact

The checklist and accompanying explanation of checklist responses provide the information and analysis necessary to assess relative environmental impacts of the Proposed Project. In doing so, the City will determine the extent of additional environmental review, if any, for the Proposed Project.

1.5 Existing Documents Incorporated by Reference

CEQA Guidelines Sections 15150, 15168(c)(3), and 15168(d)(2) permit and encourage that an environmental document incorporate by reference other documents that provide relevant data. The City of Anaheim General Plan (City of Anaheim 2020a), the City of Anaheim General Plan EIR (City of Anaheim 2004), and the Anaheim Municipal Code (City of Anaheim 2020b), which are all herein incorporated by reference pursuant to CEQA Guidelines, Section 15150, and are available for review from the following:

City of Anaheim
Planning and Building Department, Planning Services Division
200 South Anaheim Boulevard
Anaheim, California 92805
<http://www.anaheim.net/691/Planning-Zoning>

1.6 Points of Contact

The City of Anaheim is the lead agency for this environmental document. Please refer any questions about the preparation of this IS/MND, its assumptions, or its conclusions to:

Andy Uk, Associate Planner
City of Anaheim
Planning and Building Department, Planning Services Division
200 South Anaheim Boulevard, Suite 162
Anaheim, California 92805
714.765.5238
auk@anaheim.net

The point of contact for the Project Applicant is as follows:

Sarkis Tatarian
8469 Beach Circle
Cypress, California 90630
714.717.0400
sakotatarian@yahoo.com

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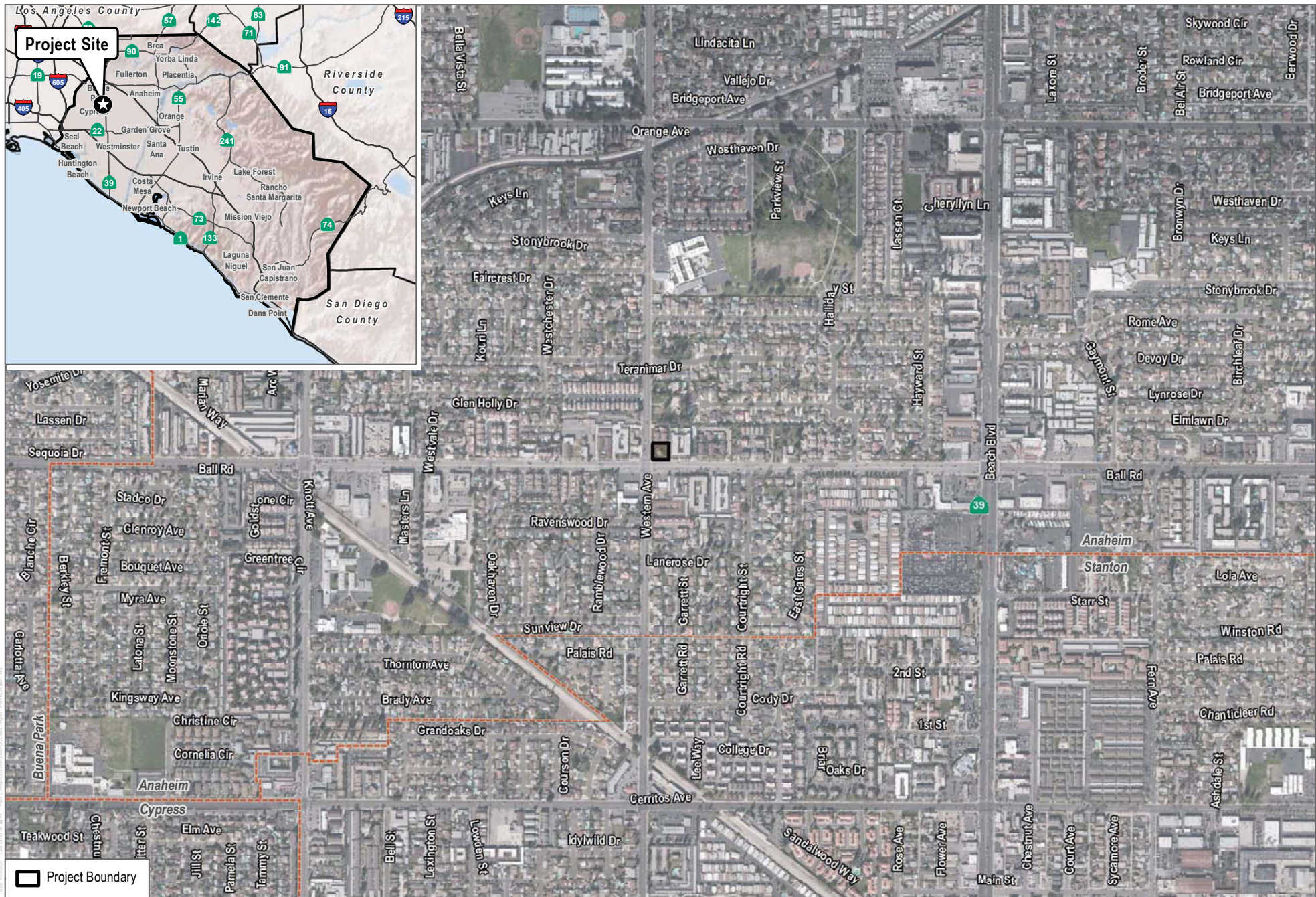
2 Project Description

2.1 Project Site

The Project Site is located in the western part of the City of Anaheim, which is in northwestern Orange County. Regionally, the City and the Project Site are located south of the City of Fullerton, west and north of the City of Orange, northeast of the City of Garden Grove, and southeast of the City of Buena Park. State Route (SR) 91 is located approximately 2.6 miles north of the Project Site; SR-22 is approximately 3.1 miles to the south; and Interstate (I) 5 is 4.8 miles east of the Project Site.

The 0.36-acre Project Site is comprised of one parcel, identified as Assessor's Parcel Number 250-051-03. The street address associated with the Project Site is 3175 West Ball Road. Adjacent land uses include Ball Road immediately to the south, Western Avenue immediately to the west, and existing medium-density residential (36 dwelling units per acre) uses to the north and to the east (Figure 1, Project Location; Figure 2, Aerial Map).

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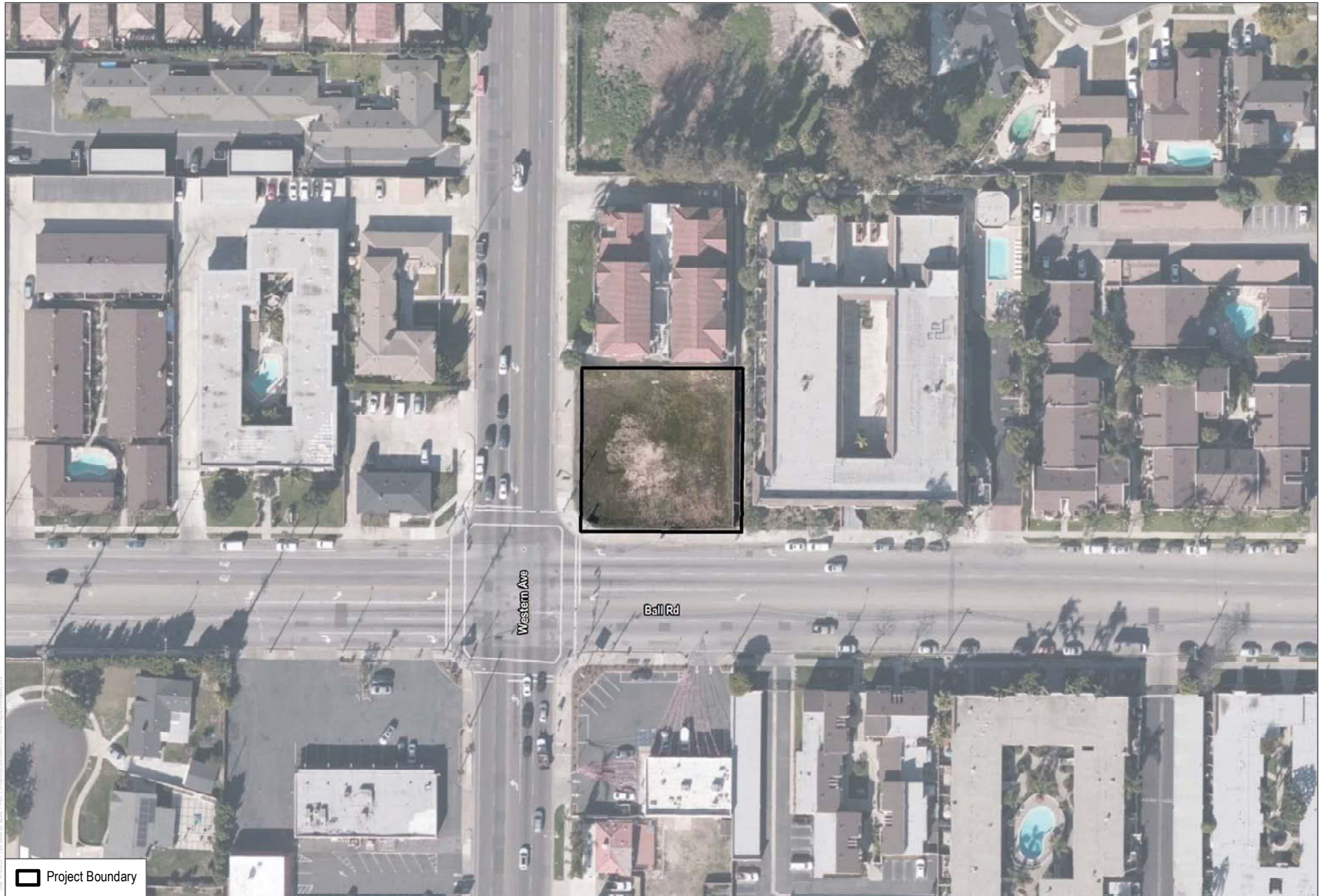
SOURCE: County of Orange 2020; Bing Maps

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FIGURE 1
Project Location
 3175 West Ball Road

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SOURCE: County of Orange 2020; Bing Maps

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2.2 Environmental Setting

City of Anaheim

The City encompasses more than 28,000 acres of land stretching nearly 20 miles along the SR-91, and includes another approximately 2,400 acres of unincorporated land within its sphere of influence. The City is a geographically diverse community. The western and central portions of the City are characterized by relatively flat ground that slopes gently to the southwest. This portion of the City is characterized by a mix of suburban and urban development and is relatively built out. The area is home to Center City (downtown Anaheim) and the Anaheim Colony Historic District, which are located within the City's original 1.8-square-mile boundary and contain the majority of the City's valued historic structures (City of Anaheim 2020a).

The eastern portion of the City extends along the Santa Ana River to the Riverside County line. This part of the City includes hillside terrain and an abundance of natural resources. Residential development in the eastern portion of the City largely consists of the various hillside communities on the southern side of SR-91 that extend to the Eastern Transportation Corridor (SR-241). Residential neighborhoods located north of the Santa Ana River, east of Imperial Highway, and south of the Santa Ana River at the intersection of SR-91 and SR-55 are relatively flat. Also located in the eastern part of the City, Anaheim Canyon is a regional employment center consisting of office, industrial, and commercial uses that spans the northern side of SR-91 between SR-57 and Imperial Highway (City of Anaheim 2020a).

Project Site

The approximately 0.36-acre, square-shaped Project Site is currently vacant. A chain-link fence encloses the Project Site's southern and western boundaries along the frontage of Western Avenue and Ball Road, and a cinderblock wall separates the Project Site from the residential properties to the north and east (Figure 3, Existing Site Photos). Additional residential uses are located southeast and west of the Project Site. A low-growing layer of perennial ruderal grasses covers the Project Site.

The Project Site is currently vacant, but was formerly the location of an E-Z Service Station facility. In May 1988, Caliber Contractors, working on behalf of the Property Owner at the time, removed three 10,000-gallon underground gasoline underground storage tanks (USTs), one 550-gallon waste oil UST, and associated appurtenances from the Project Site. Upon removal, these USTs were found to have leaked petroleum hydrocarbons, and site characterization, monitoring, and remediation activities were subsequently performed by hazardous materials specialists under contract with property owner at the time on the Project Site under the oversight of the Santa Ana Regional Water Quality Control Board (SARWQCB). A contamination clean-up case opened by the SARWQCB in June 1998, was closed in April 2012 with the requirement that a soil vapor human health risk assessment be performed if there is a change in land use to a residential or more restrictive use than the General Commercial land use designation. Dudek prepared a vapor human health risk assessment in 2017, which determined that residual contamination levels on the Project Site would not result in unacceptable human health risks (based on thresholds used by Department of Toxic Substances Control to evaluate the carcinogenic and non-carcinogenic risks to future site occupants), and the Project Site is suitable for residential development (see Section 3.9, Hazards and Hazardous Materials, for additional detail).

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Photograph A: View of Project Site from the northwest corner looking south towards Ball Road



Photograph C: View of Project Site from the northwest corner looking east towards residences



Photograph B: View of Project Site from the southwest corner looking northeast towards residences



Photograph D: View of Project Site from the southeast corner looking northwest towards Western Avenue

Photo: J. P. [illegible]

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The City's General Plan Land Use Plan Map designates the Project Site as General Commercial (Figure 4, Current General Plan Land Use Designation) and the City's Zoning Map identifies the Project Site as being within the "C-G" General Commercial Zone (Figure 5, Current Zoning).

Surrounding Land Uses

The Project Site is located in a highly urbanized part of the City. The following mix of land uses surrounds the Project Site, including existing medium-density residential (36 dwelling units per acre) and commercial uses:

- North: Medium-density residential (36 dwelling units per acre)
- East: Medium-density residential (36 dwelling units per acre)
- South: Ball Road, followed by general commercial uses
- West: Western Avenue, followed by a dentist office and medium-density residential (36 dwelling units per acre)

2.3 Proposed Project

The Project involves construction of an 11-unit, 3-story apartment building, along with associated on-site and site-adjacent improvements (Figure 6A–6C, Site Plan). The proposed apartment building will include a 27-space parking garage on the ground floor and two floors of residential units above the first floor parking garage. The residential units would include ten two-bedroom units ranging between approximately 876 to 924 square feet and one one-bedroom unit at approximately 581 square feet. Project amenities would include an interior common court area and a recreation room. In total, the Proposed Project would include 16,917 square feet of building area.

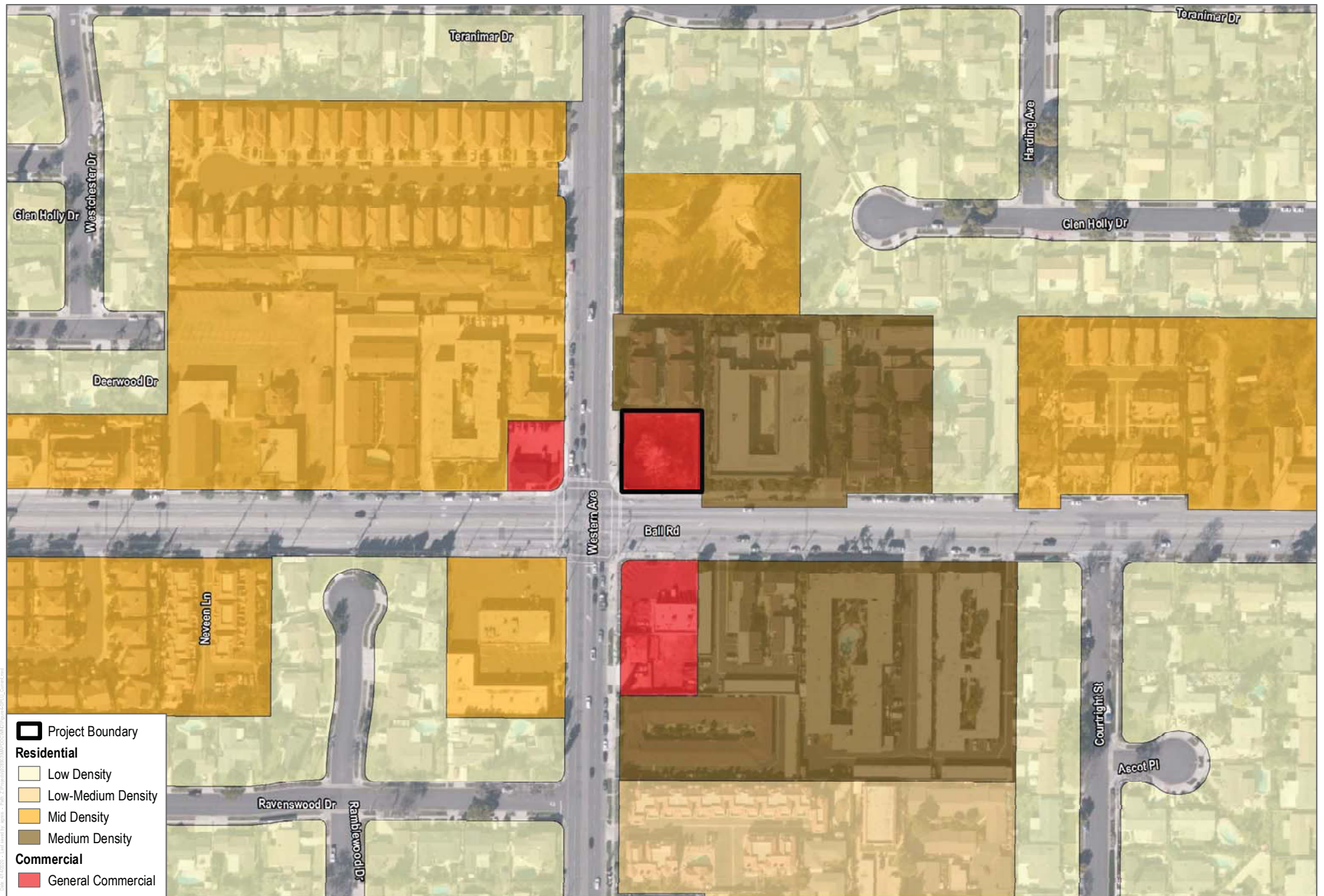
To facilitate the proposed residential use, the Project Applicant is requesting a General Plan Amendment to change the General Plan land use designation from General Commercial to Medium Density Residential, and a zoning reclassification from the "C-G" General Commercial Zone to the "RM-4" Multiple-Family Residential Zone (Figure 7, Proposed General Plan Land Use Designation; Figure 8, Proposed Zoning).

Design and Architecture

The Applicant has designed the Proposed Project to include vertical and horizontal elements that would break up the overall massing of the buildings and provide visual interest. Parkway and setback landscape areas along Ball Road and Western Avenue would also soften views of the Project Site and enhance the overall visual quality of the Proposed Project (Figure 9A–9C, Architectural Elevations).

The Applicant has designed the proposed residential building, and associated improvements, with a strong and appropriately scaled framework of architectural and landscape elements. The building's massing and the Project Site's landscaping create a sense of unity within on-site elements and with off-site elements. High-quality development features would be provided through site design (e.g., building orientation, screening), architecture (e.g., mass, scale, form, style, material, and color) and streetscape elements (e.g., lighting, paving materials).

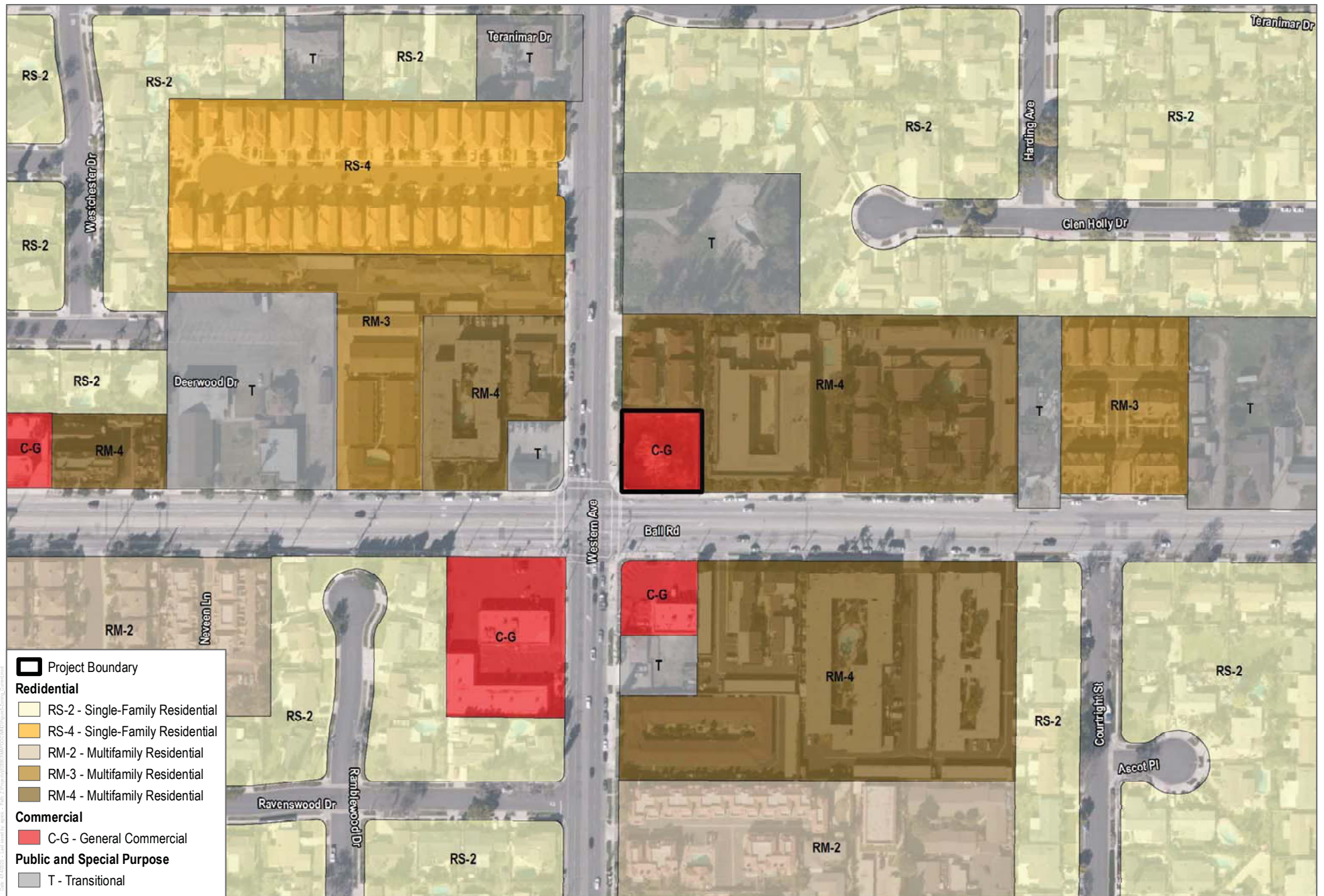
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SOURCE: County of Orange 2020; Bing Maps

FIGURE 4
Current General Plan Land Use Designation
3175 West Ball Road

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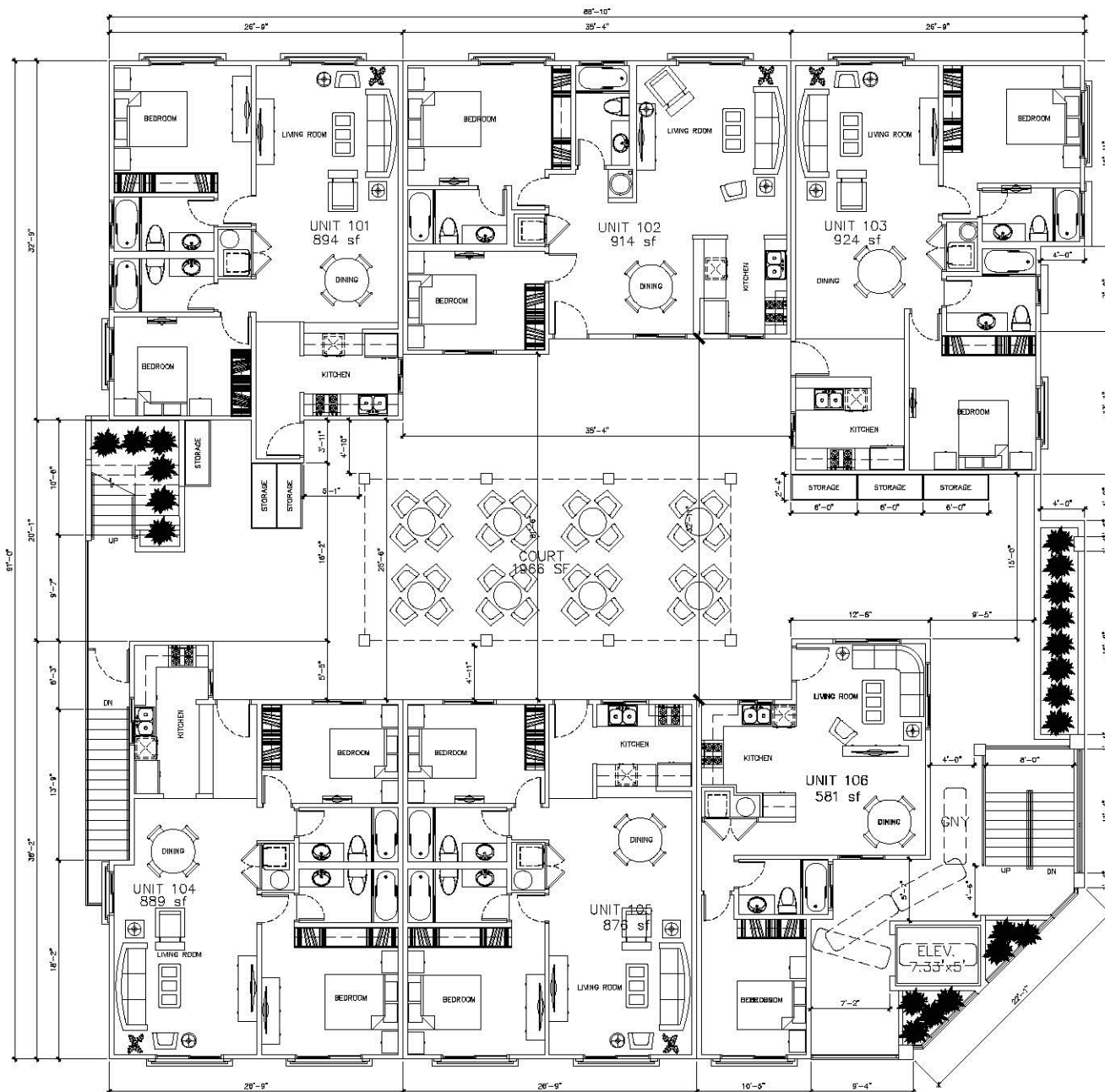


SOURCE: County of Orange 2020; Bing Maps

FIGURE 5
Current Zoning
3175 West Ball Road

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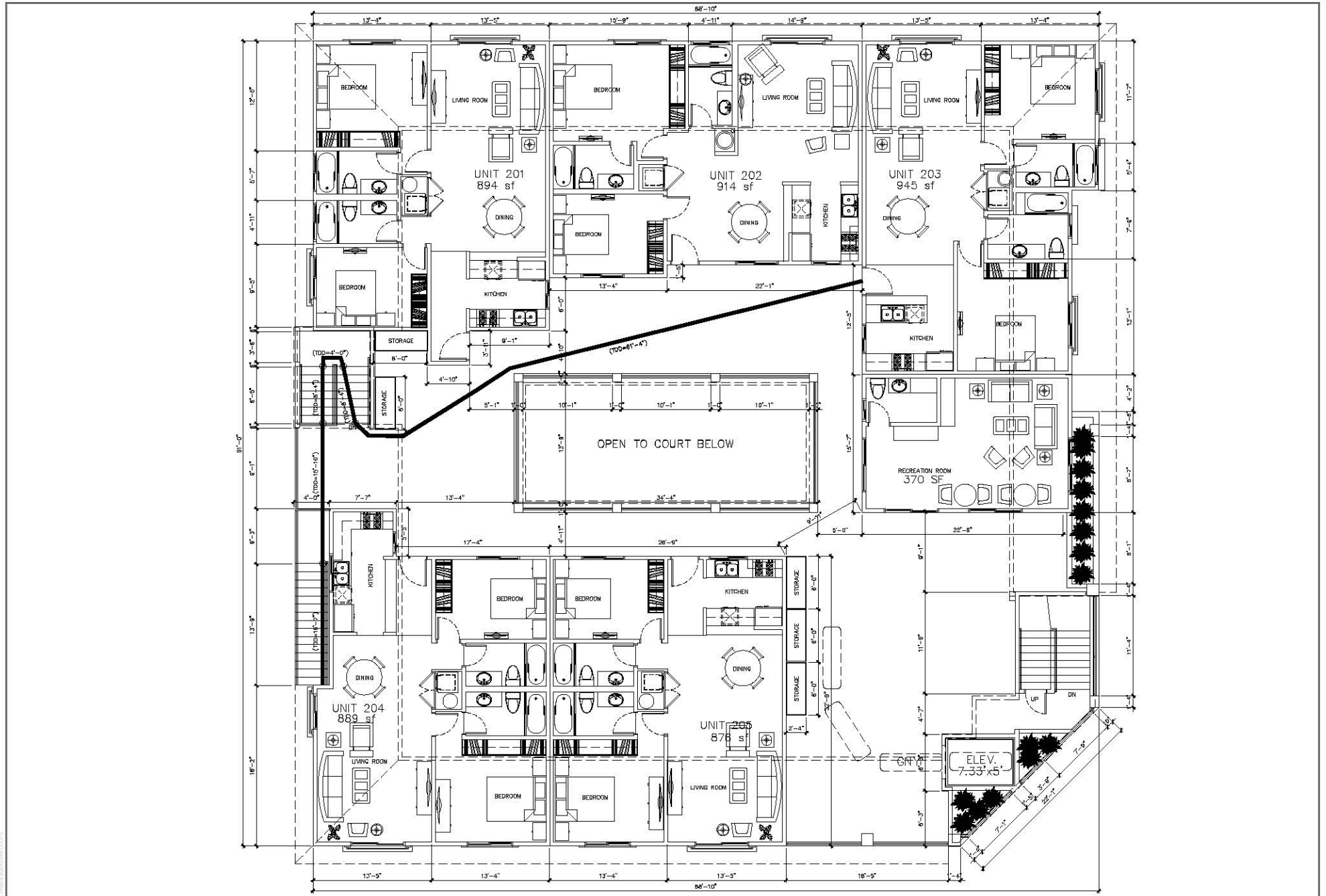


SOURCE: a&d design

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FIGURE 6B
Site Plan - First Floor
 3175 West Ball Road

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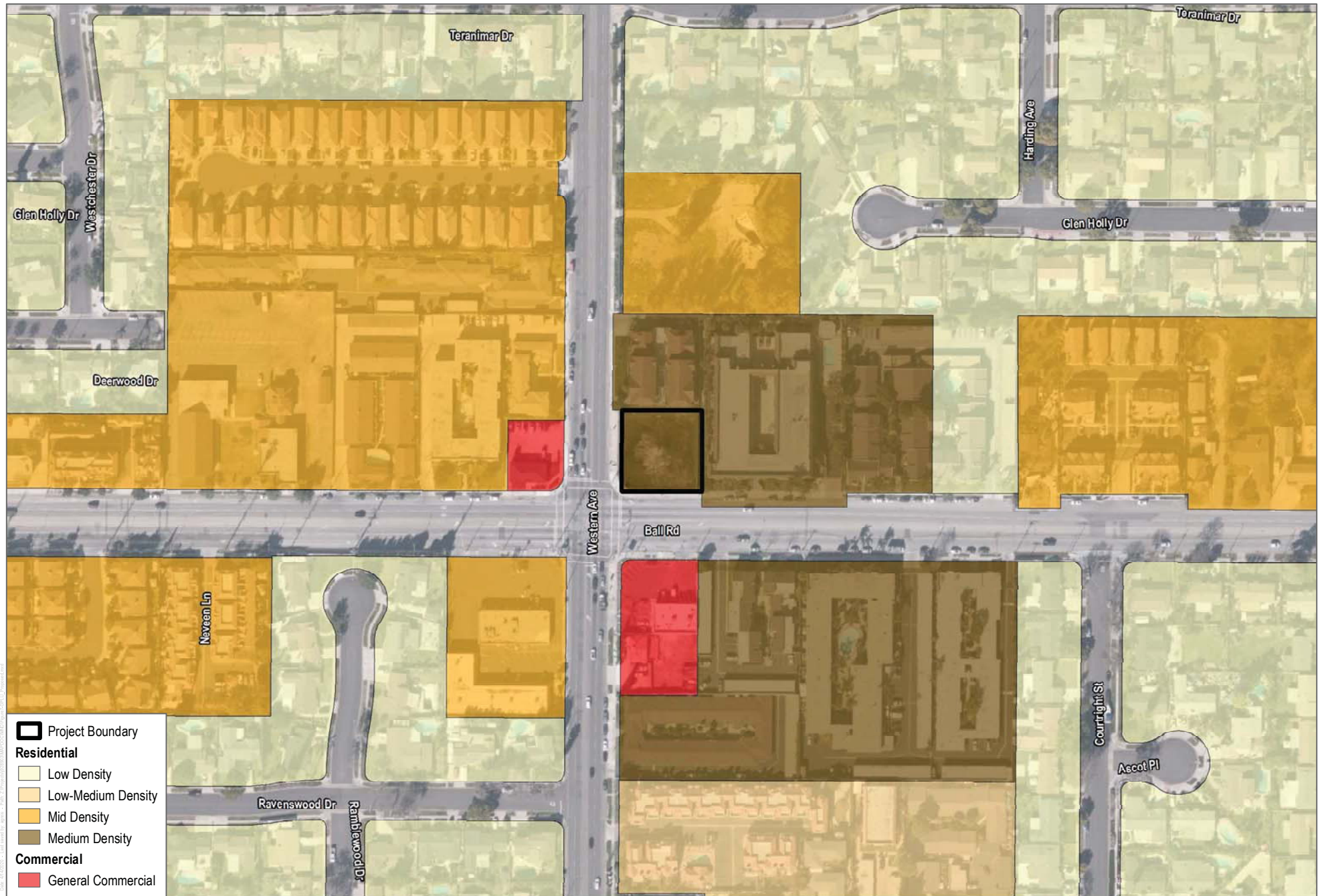


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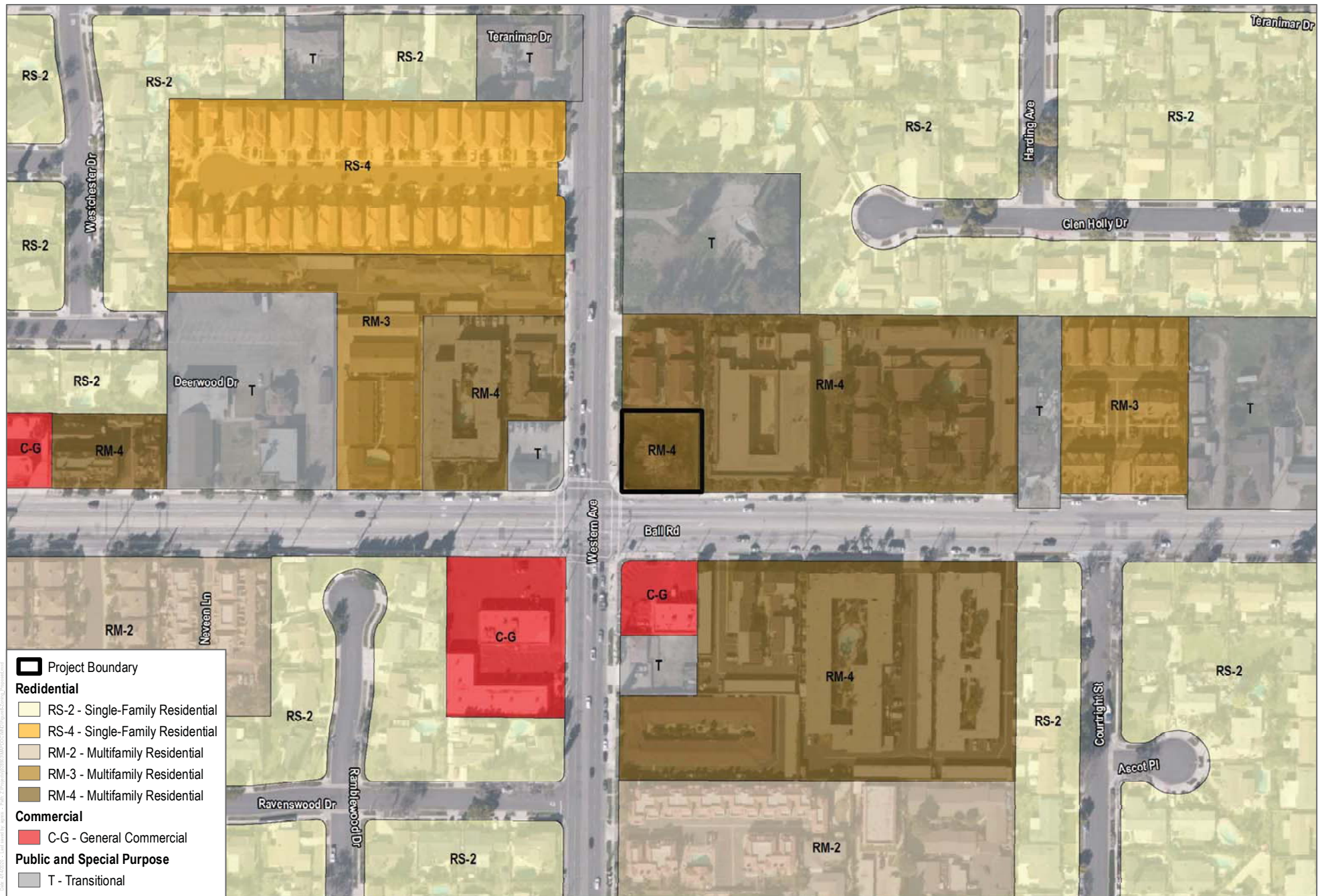
FIGURE 6C
 Site Plan - Second Floor
 3175 West Ball Road

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SOURCE: County of Orange 2020; Bing Maps

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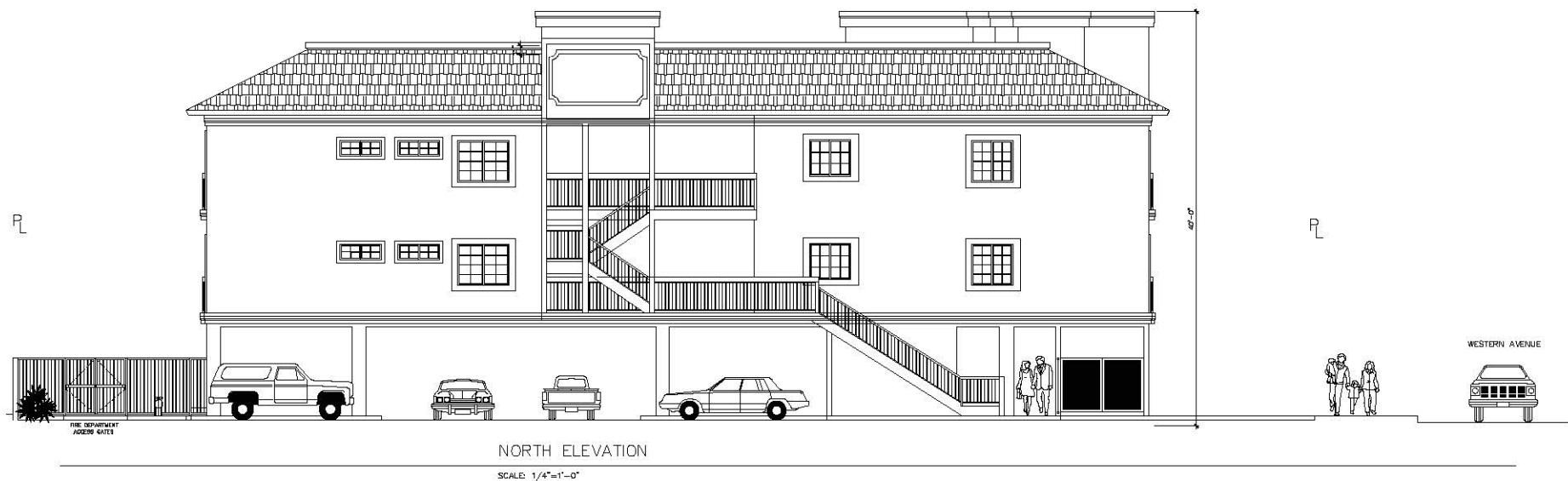


SOURCE: a&d design

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FIGURE 9A
Architectural Elevations
3175 West Ball Road

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SOURCE: a&d design

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FIGURE 9B
Architectural Elevations
3175 West Ball Road

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SOURCE: a&d design

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FIGURE 9C
Architectural Elevations
3175 West Ball Road

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Site Access, Internal Circulation, and Parking

The Project Site would be accessible from Ball Road via a 25-foot a right-in/right-out driveway located at the southwestern corner of the Project Site that would provide access to a central drive aisle and the Project's 27 parking spaces. Of the 27 parking spaces provided, the property owner or developer would assign 22 spaces to specific units, four would be unassigned, and one space would be for handicapped vehicles. The Project also provides pedestrian walkways throughout the Project Site. Additionally, the Applicant would install a sign in front of the Project driveway to indicate to drivers exiting the Project Site that the City only permits right turns out of the driveway to Ball Road.

Landscaping

Consistent with the requirements set forth in Chapter 18.46, Landscaping and Screening, of the Anaheim Municipal Code, the Applicant would provide landscape setbacks along the street frontages of the Proposed Project facing Ball Road and Western Avenue, including a minimum landscape setback of 16 feet along Western Avenue and along Ball Road, in conjunction with and Administrative Adjustment (ADJ2020-00444). In addition to shrubs and other groundcover, Section 18.46.030, Required Landscaping – Trees, of the Anaheim Municipal Code requires that the Applicant plant trees on the Project Site in the setbacks along Ball Road and Western Avenue at a minimum of one tree for every 20 linear feet of street frontage. Pursuant to this section, the size of these new trees must be a minimum of 24-inch box trees.

Utilities and Infrastructure Improvements

There are existing domestic water, sanitary sewer, stormwater, electrical and natural gas utilities immediately adjacent to the Project Site. The Project would connect to these utilities from their current locations within Ball Road and Western Avenue.

Stormwater Drainage

Currently, the Project Site is undeveloped and completely pervious. Within the vicinity of the Project site, a 24-inch-diameter storm drain is located adjacent to the Project Site's western boundary in Western Avenue, which receives stormwater flows from a catch basin located on the eastern side of Western Avenue. This 24-inch-diameter storm drain connects to a 60-inch-diameter storm drain located adjacent to the Project Site's southern boundary in Ball Road. This storm drain line also receives stormwater flows from a catch basin located along the northern side of Ball Road.

As part of the Proposed Project, the Project Site would be graded to have a highpoint in the northeasterly corner and direct flows through various storm water diversion devices towards the right of way on both Ball Road. and Western Avenue. The majority of stormwater collected on-site would be retained on the roof of the structure which will then be routed to two landscape areas on the West and South sides of the building. Other surrounding area drains for landscaped and parking areas surrounding the building would also be routed into the same landscape areas. Runoff from hardscape and parking areas would be diverted by sheet flowing towards a low point fitted with a concrete catch basin.

Once runoff is collected from various areas on-site and is diverted to the previously described landscape areas in the western and southern areas of the Project Site, all runoff would be diverted to a proposed 36-inch-diameter high-density polyethylene tank on the western side of the Project Site. The tank would be able to handle the

combined Design Capture Volume¹ of the single proposed drainage management area (DMA). Water would be stored in the tank before being pumped to a proposed biotreatment planter at a fixed rate to not overflow the planter. The bioretention planter would have a ponding depth of 6" before entering the catch basin inside the planter. After treatment from the planter, water would be diverted towards the proposed relocated catch basin (the old storm drain catch basin within Ball Road would be demolished) on the street via a 6-inch-diameter polyvinyl chloride pipes cored into the back of the catch basin, and subsequently to the 60-inch-diameter storm drain line adjacent to the Project Site's southern boundary in Ball Road.

Domestic Water and Sanitary Sewer

Anaheim Public Utilities Department would provide domestic water and sanitary sewer service. An existing water main is located within Western Avenue. The Proposed Project would connect to an existing 10-inch-diameter water line at two points in Western Avenue for domestic and irrigation purposes. An existing 8-inch-diameter City sewer line is located within Western Road. The Project would connect to this sewer line via a proposed 6-inch-diameter sewer lateral. An analysis on the 8-inch-diameter City sewer line indicates there is adequate capacity to handle the Project's sanitary sewer needs (City of Anaheim 2020c).

Natural Gas and Electric Service

Southern California Gas Company would provide natural gas service. The Proposed Project would connect to an existing underground gas line located within Western Avenue. The Anaheim Public Utilities Department would provide electric service. The Proposed Project would connect to an existing overhead electrical line located immediately adjacent to the Project Site's southeastern corner.

2.4 Construction and Phasing

The Applicant would construct the Project in a single phase, starting as early as January 2021, and lasting approximately 6 months. Construction would include site preparation, grading, trenching, construction, paving, and architectural treatments. For a breakdown of the construction schedule, refer to the California Emissions Estimator Model (CalEEMod) air quality modeling outputs provided in Appendix A.

2.5 Project Approvals

The Proposed Project would require the following discretionary approvals from the City Council prior to the issuance of grading and building permits and the start of construction:

- General Plan Amendment (GPA2016-00510) to change the Project Site's General Plan Land Use Designation from General Commercial to Low-Medium Residential
- Zoning Reclassification (RCL2016-00297) from the "C-G" General Commercial Zone to the "RM-4" Multiple-Family Residential Zone
- Administrative Adjustment (ADJ2020-00444) to allow reduced landscape setbacks of 16 feet adjacent to an arterial highway where 20 feet would be required; and an interior structural setback of 18 feet where 20 feet would be required.

¹ Per Section 7.II-2.4.3 of the Model Water Quality Management Plan, priority projects (of which the Proposed Project is one) must infiltrate, harvest and use, or biotreat/biofilter, the 85th percentile, 24-hour storm event, referred to as the design capture volume.

3 Initial Study Checklist

1. Project title:

3175 West Ball Road Apartments Project

2. Lead agency name and address:

City of Anaheim
Planning and Building Department, Planning Services Division
200 South Anaheim Boulevard, Suite 162
Anaheim, California 92805

3. Contact person:

Andy Uk, Associate Planner
auk@anaheim.net

4. Project location:

3175 West Ball Road
Anaheim, California 92804

5. Project sponsor's name and address:

Sarkis Tatarian
8469 Beach Circle
Cypress, California 90630
714.717.0400
sakotatarian@yahoo.com

6. Existing and Proposed General Plan Land Use Designation:

Existing: General Commercial
Proposed: Medium Density Residential

7. Existing and Proposed Zoning:

Existing: "C-G" General Commercial Zone
Proposed: "RM-4" Multiple-Family Residential Zone

8. Description of Proposed Project:

The Proposed Project would involve the construction of an 11-unit, 3-story apartment building, along with associated on-site and site-adjacent improvements such as parking, pedestrian walkways, and landscape areas. Refer to Section 2.3, Proposed Project, for a full description of the Proposed Project.

9. Surrounding land uses and setting (Briefly describe the project's surroundings):

The Project Site is located in a highly urbanized part of the City. The following mix of land uses surrounds the Project Site, including existing medium-density residential (36 dwelling units per acre) and commercial uses:

- North: Medium-density residential (36 dwelling units per acre)
- East: Medium-density residential (36 dwelling units per acre)
- South: Ball Road, followed by general commercial uses
- West: Western Avenue, followed by a dentist office and Medium-density residential (36 dwelling units per acre)

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

No other public agency approval is required.

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.

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology and Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards and Hazardous Materials |
| <input type="checkbox"/> Hydrology and Water Quality | <input type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

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 Proposed Project have been made by or agreed to by the Project Applicant. 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 measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the Proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the Proposed Project, nothing further is required.



Andy Uk, Associate Planner

July 07, 2020

Date

Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an Environmental Impact Report (EIR) is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significance

3.1 Aesthetics

	Potentially Significant Impact	Less-Than- Significant Impact With Mitigation Incorporated	Less-Than- Significant Impact	No Impact
I. AESTHETICS – Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

No Impact. Scenic vistas and other important visual resources are typically associated with natural landforms such as mountains such as mountains, foothills, ridgelines, and coastlines. The City's General Plan Green Element identifies the Hill and Canyon Area of the City, Santa Ana Mountains, and Santa Ana River as important visual landmarks within the City. Goal 2.1 of the Green Element states, "Preserve views of ridgelines, natural open space, and other scenic vistas wherever possible." To achieve this goal, the Green Element discusses four policies. These policies include controlling infill development on visually significant ridgelines, canyon edges and hilltops; encouraging development that preserves natural contours and views of existing backdrop ridgelines or prominent views; siting parks and other open space amenities to take advantage of natural vistas; and encouraging future development and public improvements to maximize private and public views of golf course fairways. In addition, the General Plan Green Element specifically states that golf courses and the Santa Ana River provide visual relief from the surrounding built environment (City of Anaheim 2020a).

The Project Site is located at the northeastern corner of the intersection of Ball Road and Western Avenue, surrounded by existing urbanized land uses, and in a highly developed area of the western part of the City. The Project Site is approximately 8 miles southwest from the nearest golf course (i.e., Coyote Hills Golf Course), and over 15 miles west of the Hill and Canyon area of the City, Santa Ana Mountains, and Santa

Ana River. The Proposed Project would not be within the viewshed of any scenic vistas or otherwise impact visual resources in the broader area surrounding the Project Site, because of the distances between the Project Site and these visual resources, the intervening natural topographic variations and constructed development located between the site and these resources. Therefore, no impacts associated with scenic vistas would occur.

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

No Impact. The nearest designated state scenic highway to the Project Site is the segment of SR-91 (Riverside Freeway) located approximately between SR-55 and the Orange County/Riverside County line (Caltrans 2019). This segment of SR-91 is located approximately 10 miles west of the Project Site. Additionally, the Project site is not located near a City-designated scenic expressway, as shown on Figure C-1 of the City's Circulation Element (City of Anaheim 2020a). The nearest scenic expressway is Santa Ana Canyon Road between Lakeview Avenue and Imperial Highway, over 11 miles to the east. Due to the significant distance between the Project Site and these roadways, and because of the amount of intervening natural topographic variations and constructed development between these roadways and the Project Site, the Proposed Project would not be located in the viewshed of a designated state scenic highway or City-designated scenic expressway. Therefore, no impacts associated with state scenic highways or City-designated scenic expressways would occur.

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

Less-than-Significant-Impact. The Project Site is located in an urbanized part of the City, at the northeastern corner of the intersection of Ball Road and Western Avenue, surrounded by existing multifamily residential and commercial uses. The Proposed Project involves a General Plan Amendment to change the Project Site's General Plan Land Use Designation from General Commercial to Low-Medium Residential; a Zoning Reclassification to change the Project Site's zoning designation from the "C-G" General Commercial Zone to the "RM-4" Multiple-Family Residential Zone; and an Administrative Adjustment to allow reduced landscape setbacks adjacent to an arterial highway and reduced interior structural setbacks. Upon approval of these discretionary actions, the Proposed Project would be a permitted use within the RM-4 Zone and would be consistent with the Low-Medium Residential General Plan Land Use Designation.

To ensure that adjacent land uses are aesthetically compatible with one another, and to prevent visual incompatibility issues between neighboring uses, the City requires a review of all building and site plans by the Building Division of the Planning Department pursuant to Section 18.90.110.010 of the Anaheim Municipal Code (City of Anaheim 2020b). The purpose of this review is to ensure that the design of a proposed development project is consistent with all applicable requirements, standards, and regulations set forth by the Anaheim Municipal Code, as well as other relevant local, state, and federal regulations. Included as part of this review, is an assessment of a project's architecture to ensure that the Applicant is proposing an integrated architectural theme that is compatible with and would complement the site and surrounding properties. As such, approval of the proposed General Plan Amendment, Zoning Reclassification, and Administrative Adjustment and compliance with the City's required building and site

plan review would ensure that the Proposed Project would not conflict with applicable zoning regulations governing scenic quality.

Additionally, the City's General Plan contains various goals, policies, and objectives related to scenic quality. Specifically, the Green Element contains goals, policies, and objectives related to the preservation and enhancement of natural and green spaces throughout the City, and the Community Design Element contains goals, policies, and objectives related to community-wide design features such as gateways, streets and public signage, as well as special policies for specific districts within the City. While these General Plan Elements do not provide specific development regulations, they do provide policy guidance that is intended to provide a practical framework for development within the City (City of Anaheim 2020a). Specific policies, goals, and objectives from the Green Element and Community Design Element of the City's General Plan related to scenic quality that are applicable to the Proposed Project, as well as the Proposed Project's consistency with these policies, goals, and objectives, are discussed below.

Green Element:

- Objective 3: Beautify arterial corridors with landscape plans, edge treatments and gateways
- *Consistency Analysis for Objective 3: The Proposed Project, which is located on Ball Road, a primary arterial, would include improvements to the frontage of Ball Road and Western Avenue consisting of a new sidewalk and landscaping.*
- Goal 2.1: Preserve views of ridgelines, natural open space and other scenic vistas wherever possible.
- *Consistency Analysis for Goal 2.1: As discussed above, the Proposed Project is not located within the viewshed of any scenic vistas or otherwise impact visual resources in the broader area surrounding the Project Site.*
- Policy 23.1-5: Continue to strengthen neighborhood and community identity by using tree species consistent with the City's Official Tree Species List.
- *Consistency Analysis for Policy 23.1-5: The Proposed Project would include tree species that are listed on the City's Official Tree Species List.*
- Goal 23.2: Complete the City's comprehensive program of corridor landscaping, including entryways, medians, and parkways, to strengthen the identity of major corridors and the City as a whole.
- *Consistency Analysis for Goal 23.2: The Proposed Project would include improvements to the frontage of Ball Road and Western Avenue consisting of a new sidewalk and landscaping, which would strengthen the identity of these major corridors.*

Community Design Element

- Goal 2.1: Attractively landscape and maintain Anaheim's major arterial corridors and prepare/implement distinctive streetscape improvement plans.
- *Consistency Analysis for Goal 2.1: The Proposed Project, which is located on Ball Road, a primary arterial, would include improvements to the frontage of Ball Road and Western Avenue consisting of a new sidewalk and landscaping.*
- Goal 4.1: Multiple-family housing is attractively designed and scaled to complement the neighborhood and provides visual interest through varied architectural detailing.

- *Consistency Analysis for Goal 4.1: The Applicant has designed the proposed residential building, and associated improvements, with a strong and appropriately scaled framework of architectural and landscape elements. The Proposed Project would be visually consistent with surrounding multi-family development within the Project area.*
- Policy 4.1-1: Reduce the visual impact of large-scale, multiple-family buildings by requiring articulated entry features, such as attractive porches, and detailed facade treatments, which create visual interest and give each unit more personalized design.
- *Consistency Analysis for Policy 4.1-1: The Proposed Project be an 11-unit apartment building, which in the context of other multi-family buildings in the City, is a relatively small building, and would be consistent with other multi-family development in the Project area. Additionally, the Proposed Project would include an articulated entry feature and variations in rooflines, wall articulation, window treatments, colors and building materials to create a visually interesting and high-quality appearance.*
- Policy 4.1-2: Discourage visually monotonous, multiple-family residences by incorporating different architectural styles, a variety of rooflines, wall articulation, balconies, window treatments, and varied colors and building materials on all elevations.
- *Consistency Analysis for Policy 4.1-2: The Proposed Project would include an articulated entry feature and variations in rooflines, wall articulation, window treatments, colors and building materials to create a visually interesting and high-quality appearance.*
- Policy 4.1-4: Reduce the visual impact of parking areas by utilizing interior courtyard garages, parking structures, subterranean lots, or tuck-under, alley-loaded designs.
- *Consistency Analysis for Goal 2.1: The Proposed Project would reduce the visual impact of parking areas by placing parking within an interior covered garage.*
- Policy 4.1-9: Where possible, underground or screen utilities and utility equipment or locate and size them to be as inconspicuous as possible.
- *Consistency Analysis for Policy 4.1-9: Given the disposition of existing overhead utilities and the limited extent of where these utilities front the Project Site, it is unfeasible to underground existing utilities as part of the Proposed Project. However, these utilities may be undergrounded in the future as part of the City's Underground Conversion Program.*
- Goal 17.1: Improve West Anaheim's residential neighborhoods and strategically locate quality retail development
- *Consistency Analysis for Goal 17.1-1: See Consistency Analysis for Policy 17.1-2 below.*
- Policy 17.1-2: Enhance the image of West Anaheim by continuing to implement streetscape and landscape improvements on major corridors and local streets.
- *Consistency Analysis for Goal 17.1-1 and Policy 17.1-2: Under the existing conditions, the Project site consists of an underutilized vacant lot. The Proposed Project would involve the development of an apartment building on the Project Site that features high-quality design, provides landscaping throughout the Project Site, including along Ball Road and Western Avenue, and provides sidewalk improvements. These Project components would strengthen the image of the Project Site and improve the overall visual character of an area within West Anaheim.*

As discussed above, with approval of the proposed General Plan Amendment, Zoning Reclassification, and Administrative Adjustment, the Proposed Project would not conflict with applicable zoning regulations governing scenic quality. Therefore, impacts associated with the visual character and quality of the Project Site and its surroundings would be less than significant.

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

Less-than-Significant Impact. Exterior lighting can be a nuisance to adjacent land uses that are sensitive to lighting. This nuisance, or light trespass, is the presence of unwanted light on properties located adjacent to a light source. The following analyzes the potential light and glare impacts associated with the Proposed Project.

Short-Term Construction Impacts

The Proposed Project would be required to comply with Chapter 6.70 of the Anaheim Municipal Code, which prohibits noise sources associated with construction between 7:00 a.m. and 7:00 p.m. As such, Project construction would be limited to the daytime hours, and nighttime lighting would not be required until the Proposed Project is operational. Therefore, no short-term construction impacts associated with light and glare would occur.

Long-Term Operational Impacts

The Proposed Project would introduce new sources of nighttime lighting from decorative exterior lighting and parking garages and within residences. In general, nighttime lighting would be required for safety and security and aesthetic purposes. Lighting from the Project Site would be visible from the residential and commercial properties that are adjacent to the Project Site. However, lighting would be typical of residential uses and would not include any intense lighting uses. Per the Proposed Project's plans, the Applicant has designed the exterior lighting to be shielded/hooded to prevent light trespass onto nearby properties, including the residences immediately north and east of the Project Site. Considering the existing sources of lighting in surrounding areas, including headlights along Ball Road and Western Avenue, streetlights, and exterior lighting from neighboring properties, the amount and intensity of nighttime lighting proposed on site would not be substantially greater or different from existing lighting in the surrounding area.

With regard to glare, the Applicant would construct the Proposed Project with a variety of building materials, including stucco, wood, and painted surfaces, many of which would have minimal or no reflective properties. All reflective materials such as glass, metals, and windows would be consistent with reflective building materials currently found in the surrounding area under existing conditions.

3.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
II. 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 Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

No Impact. The Project Site is located in a predominantly urbanized area. The California Department of Conservation's California Important Farmland Finder identifies the Project Site and surrounding area as Urban and Built-Up Land (CDOC 2020). The Project Site is not located on or adjacent to any parcels identified as Prime Farmland, Unique Farmland, or Farmland of State Importance (collectively called

Important Farmland). Due to the lack of Important Farmland on the Project Site and the surrounding area, development of the Proposed Project would not convert or otherwise convert any Important Farmland. Therefore, no impacts associated with conversion of Important Farmland would occur.

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

No Impact. The Project Site is located within the “C-G” General Commercial Zone and has a General Plan Land Use Designation of General Commercial. Neither the Project Site nor any surrounding parcel is within a zone for agricultural use. Additionally, the Project Site is not subject to a Williamson Act contract. Therefore, the Proposed Project would not conflict with an existing zone for agricultural use or conflict with a Williamson Act contract. No Impact would occur.

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

No Impact. The Project Site is located within a highly developed portion of the City. According to the City’s Zoning Map, the Project Site is not located on or adjacent to forestland, timberland, or timberland zoned Timberland Production. Therefore, no impacts associated with forest land or timberland zoning would occur.

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

No Impact. The Project Site is located within a largely urban setting. The Project Site is not located on or adjacent forestland. No private timberlands or public lands with forests are located in the City. Therefore, no impact associated with the loss or conversion of forestland would occur.

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

No Impact. As previously addressed, the Project Site is not located on or adjacent to any lands identified by either the state or the City as Important Farmland or forestland. The Proposed Project would not include any on-site or Project-adjacent improvements that would result in the conversion of Important Farmland or forestland uses. Therefore, no impacts associated with the conversion of Important Farmland or forestland would occur.

3.3 Air Quality

	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
III. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Less-than-Significant Impact. The Project Site is located within the South Coast Air Basin (SCAB), which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County, and is within the jurisdictional boundaries of South Coast Air Quality Management District (SCAQMD).

The SCAQMD administers the Air Quality Management Plan (AQMP) for the SCAB, which is a comprehensive document outlining an air pollution control program for attaining all California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The most recent adopted AQMP is the 2016 AQMP (SCAQMD 2017), which the SCAQMD Governing Board adopted in March 2017. The 2016 AQMP represents a new approach, focusing on available, proven, and cost-effective alternatives to traditional strategies while seeking to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gases (GHGs) and toxic risk, as well as efficiencies in energy use, transportation, and goods movement (SCAQMD 2017).

The purpose of a consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans, and, thus, if it would interfere with the region's ability to comply with federal and state air quality standards. The SCAQMD has established criteria for determining

consistency with the currently applicable AQMP in Chapter 12, Sections 12.2 and 12.3, in the SCAQMD CEQA Air Quality Handbook. The criteria are as follows (SCAQMD 1993):

- Whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP.
- Whether the project would exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

To address the first criterion regarding the Project's potential to result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP, Project-generated criteria air pollutant emissions were estimated and analyzed for significance. Section 3.3(b) addresses these emissions; detailed results of this analysis are included in Appendix A. As presented in Section 3.3(b), Project construction would not generate criteria air pollutant emissions that would exceed the SCAQMD thresholds, and the Project is not anticipated to generate operational criteria air pollutant emissions.

The second criterion regarding the Project's potential to exceed the assumptions in the AQMP or increments based on the year of Project buildout and phase is primarily assessed by determining consistency between the Project's land use designations and potential to generate population growth. In general, the Proposed Project would be consistent with, and would not conflict with or obstruct implementation of, the AQMP if the growth in socioeconomic factors is consistent with the underlying regional plans used to develop the AQMP (per Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook). The SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by the Southern California Association of Governments (SCAG) for its Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (SCAG 2016). SCAG bases its growth forecasts on general plans for cities and counties in the SCAB. The SCAQMD uses these growth forecasts for the development of the AQMP emissions inventory (SCAQMD 2017).² The SCAG 2016 RTP/SCS, and associated Regional Growth Forecast, are generally consistent with the local plans; therefore, the 2016 AQMP is generally consistent with local government plans.

Although the Connect SoCal (also known as the 2020–2045 RTP/SCS) is the most recent RTP/SCS, the SCAQMD is still in the early stages of updating their AQMP. Therefore, the SCAG 2016 RTP/SCS and associated Regional Growth Forecast would be applicable in this analysis. The Final SCAG 2016 RTP/SCS provides population estimates for the years 2012 and 2040. To provide an interim year comparison, this analysis interpolates the City's projected population in the Project's operational year (2019) based on the average growth rate to compare with the estimated increase in population generated by the Project. The SCAG 2016 RTP/SCS estimates that the City's population will increase by approximately 58,100 people between 2012 and 2040, or approximately 2,075 people annually. Table 1 provides the SCAG 2016 RTP/SCS interpolated 2022 population forecasts for the City.

² Information necessary to produce the emission inventory for the SCAB is obtained from the SCAQMD and other governmental agencies, including the California Air Resources Board (CARB), the California Department of Transportation, and SCAG. Each of these agencies is responsible for collecting data (e.g., industry growth factors, socioeconomic projections, travel activity levels, emission factors, emission speciation profile, and emissions) and developing methodologies (e.g., model and demographic forecast improvements) required to generate a comprehensive emissions inventory. SCAG incorporates these data into its Travel Demand Model for estimating/projecting vehicle miles traveled and driving speeds. SCAG's socioeconomic and transportation activities projections in their 2016 RTP/SCS are integrated in the 2016 AQMP (SCAQMD 2017).

Table 1. SCAG 2016 RTP/SCS Regional Growth Forecast

Year	Population Estimate
2012	345,300
2022 ^a	366,050
2040	403,400

Source: SCAG 2016.

Note:

- ^a The population estimate for 2022 was interpolated based on the population forecast values for 2012 and 2040 provided in the SCAG 2016 RTP/SCS.

Pursuant to the household estimates provided in the SCAG Local Profiles Report, the average household size in the City in the year 2018 is 3.5 persons per household (SCAG 2019a). Based on this assumption, the proposed 11 residential units could generate 39 persons upon its completion in 2022.

As discussed in in this IS/MND, the Project site has a General Plan land use designation of General Commercial and is within the “C-G” General Commercial Zone. In order to facilitate the Project, the Project Applicant is requesting a General Plan Amendment to change the current land use and zoning designations to Residential Medium and RM-4 – Multiple-Family Residential. Although the Proposed Project is currently inconsistent with the General Plan land use designation for the Project Site, the Proposed Project would be consistent with the adjacent residential and commercial land uses and would be in substantial compliance with the Land Use Element goals and policies of the City’s General Plan. Furthermore, when compared to the General Plan land use designation used in the SCAG 2016 RTP/SCS, the Proposed Project’s proposed use of the Project site (i.e., Residential Medium) would be similar to, if not less intensive than, the assumed commercial use of the Project Site. Additionally, the Project is not a project of statewide, regional or area-wide significance (Section 15206(b) of the CEQA Guidelines states that a project is of statewide, regional, or area-wide significance if it would involve a net increase of over 500 residential dwelling units). Moreover, the addition of 39 persons in 2022 would only be 1.9 percent of the SCAG 2016 RTP/SCS interpolated annual population increase estimate of 2,075 persons, which would be a nominal deviation from the assumed Regional Growth Forecast. Therefore, implementation of the Project would not result in a conflict with, or obstruct implementation of, the applicable air quality plan (i.e., the 2016 AQMP). Accordingly, the Project would meet Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook.

Summary

As described previously, 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, and would not conflict with Consistency Criterion No. 1. Implementation of the Project would be not contribute significantly or exceed the demographic growth forecasts in the SCAG 2016 RTP/SCS; therefore, the Project would also be consistent with the SCAQMD 2016 AQMP, which based future emission estimates on the SCAG 2016 RTP/SCS. Thus, the Proposed Project would not conflict with Consistency Criterion No. 2. Based on these considerations, impacts related to the Proposed Project’s potential to conflict with or obstruct implementation of the applicable air quality plan would be less than significant.

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

Less-than-Significant Impact. Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the SCAQMD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, this analysis uses project-level thresholds of significance for criteria pollutants in the determination of whether a project's individual emissions would have a cumulatively considerable contribution on air quality. If a project's emissions would exceed the SCAQMD significance thresholds, the analysis would conclude that the Project would have a cumulatively considerable contribution. Conversely, projects that do not exceed the project-specific thresholds are generally not cumulatively significant (SCAQMD 2003).

Dudek conducted a quantitative analysis to determine whether the Proposed Project would result in a cumulatively considerable net increase in emissions of criteria air pollutants for which the NAAQS or CAAQS designates the SCAB as nonattainment for these emissions. Criteria air pollutants include ozone (O_3), nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide (SO_2), particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM_{10} ; coarse particulate matter), particulate matter with an aerodynamic diameter less than or equal to 2.5 microns ($PM_{2.5}$; fine particulate matter), and lead. The analysis included volatile organic compounds (VOCs) and oxides of nitrogen (NO_x), which are important because they are precursors to O_3 , as well as CO, sulfur oxides (SO_x), PM_{10} , and $PM_{2.5}$.

Regarding NAAQS and CAAQS attainment status,³ the SCAB is designated as a nonattainment area for federal and state O_3 and $PM_{2.5}$ standards (CARB 2017a; EPA 2018). The California Air Resources Board (CARB) and U.S. Environmental Protection Agency (EPA) designates the SCAB as a nonattainment area for state PM_{10} standards; however, it is an attainment area for federal PM_{10} standards. The nonattainment status is the result of cumulative emissions from various sources of air pollutants and their precursors within the SCAB, including motor vehicles, off-road equipment, and commercial and industrial facilities. The EPA and CARB also designates SCAB as an attainment area for federal and state CO and NO_2 standards, as well as for state SO_2 standards. Although the EPA designates the SCAB as nonattainment for the federal rolling 3-month average lead standard, CARB designates the SCAB as attainment for the state lead standard.⁴

The Project would result in emissions of criteria air pollutants for which CARB and EPA have adopted ambient air quality standards (i.e., the NAAQS and CAAQS). Projects that emit these pollutants have the potential to cause, or contribute to, violations of these standards. The SCAQMD CEQA Air Quality Significance Thresholds, as revised in April 2019, set forth quantitative emission significance thresholds for criteria air pollutants, which, if exceeded, would indicate the potential for a project to contribute to violations of the NAAQS or CAAQS. Table 2 lists the revised SCAQMD Air Quality Significance Thresholds (SCAQMD 2019).

³ An area is designated as in attainment when it is in compliance with the NAAQS and/or the CAAQS. These standards for the maximum level of a given air pollutant that can exist in the outdoor air without unacceptable effects on human health or the public welfare are set by the U.S. Environmental Protection Agency and CARB, respectively. Attainment = meets the standards; attainment/maintenance = achieves the standards after a nonattainment designation; nonattainment = does not meet the standards.

⁴ The phase-out of leaded gasoline started in 1976. Since gasoline no longer contains lead, the Proposed Project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

Table 2. SCAQMD Air Quality Significance Thresholds

Criteria Pollutants Mass Daily Thresholds		
Pollutant	Construction (in pounds/day)	Operation (in pounds/day)
VOC	75	55
NO _x	100	55
CO	550	550
SO _x	150	150
PM ₁₀	150	150
PM _{2.5}	55	55
Lead ^a	3	3
Toxic Air Contaminants and Odor Thresholds		
TACs ^b	Maximum incremental cancer risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic and Acute Hazard index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	

Source: SCAQMD 2019.

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = particulate matter with a diameter less than or equal to 10 microns (coarse particulate matter); PM_{2.5} = particulate matter with a diameter less than or equal to 2.5 microns (fine particulate matter); SCAQMD = South Coast Air Quality Management District; TAC = toxic air contaminant.

^a The phase-out of leaded gasoline started in 1976. Since gasoline no longer contains lead, the Proposed Project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

^b TACs include carcinogens and noncarcinogens.

The Project would result in a substantial contribution to an existing air quality violation of the NAAQS or CAAQS for O₃, which is a nonattainment pollutant, if the Proposed Project's construction or operational emissions exceed the SCAQMD VOC or NO_x thresholds shown in Table 2. SCAQMD intends these emission-based thresholds for O₃ precursors to serve as surrogates for an "ozone significance threshold" (i.e., the potential for adverse O₃ impacts to occur). SCAQMD uses this threshold because O₃ itself is not emitted directly, and the effects of an individual project's emissions of O₃ precursors (i.e., VOCs and NO_x) on O₃ levels in ambient air cannot be reliably or meaningfully determined through air quality models or other quantitative methods.

Construction Emissions

Proposed construction activities would result in the temporary addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment and soil disturbance) and off-site sources (i.e., on-road haul trucks, delivery trucks, and worker vehicle trips). Construction emissions can vary substantially from day to day, depending on the level of activity; the specific type of operation; and, for dust, the prevailing weather conditions. Therefore, this analysis can only approximately estimate such emission levels with a corresponding uncertainty in precise ambient air quality impacts.

The analysis used CalEEMod, Version 2016.3.2, to estimate emissions for construction of the Project. CalEEMod is a statewide computer model developed in cooperation with air districts, to quantify criteria pollutant and GHG emissions. CalEEMod input parameters, including the project size, construction schedule, number of worker/delivery/haul trips, and anticipated construction equipment utilization, were based on information provided by the Project Applicant and default model assumptions when Project-specific data was not available.

For conservatively estimating Project emissions, the analysis assumed that construction of the Project would start in January 2021 and would last approximately 6 months. Table 3 shows the construction phasing, schedule and duration; vehicle trip assumptions; and, construction equipment mix used for estimating the Project-generated emissions.

Table 3. Construction Scenario Assumptions

Construction Phase	Start Date	Finish Date	One-Way Vehicle Trips			Equipment		
			Average Daily Workers	Average Daily Vendor Trucks	Total Haul Trucks	Type	Quantity	Usage Hours
Site Preparation	01/04/2021	01/04/2021	6	0	0	Graders	1	8
						Tractors/loaders/backhoes	1	8
Grading	01/05/2021	01/06/2021	10	0	0	Concrete/industrial saws	1	8
						Rubber-tired dozers	1	1
						Tractors/loaders/backhoes	2	6
Building Construction	01/07/2021	05/26/2021	12	4	0	Cranes	1	4
						Forklifts	2	6
						Tractors/loaders/backhoes	2	8
Paving	05/27/2021	06/02/2021	18	0	0	Cement and mortar mixers	4	6
						Pavers	1	7
						Rollers	1	7
						Tractors/loaders/backhoes	1	7
Architectural Coating	06/03/2021	06/09/2021	2	0	0	Air compressors	1	6

Notes: See Appendix A for details.

Internal combustion engines used by construction equipment, trucks, and worker vehicles would result in emissions of VOCs, NO_x, CO, PM₁₀, and PM_{2.5}. PM₁₀ and PM_{2.5}. Entrained dust, which results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, would also generate emissions. The Project would be required to comply with SCAQMD Rule 403 to control dust emissions during any dust-generating activities. The Applicant would employ standard construction practices to reduce fugitive dust emissions include watering of the active grading areas two times per day, with additional watering depending on weather conditions.

Table 4 provides estimated maximum daily construction criteria air pollutant emissions from all on-site and off-site emission sources.

Table 4. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions

Year	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	<i>Pounds per Day</i>					
2021	22	8	8	<1	1	1
<i>SCAQMD Threshold</i>	75	100	550	150	150	55
Threshold exceeded?	No	No	No	No	No	No

Source: SCAQMD 2019.

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter; SCAQMD = South Coast Air Quality Management District.

See Appendix A for detailed results.

As shown in Table 4, daily construction emissions would not exceed the SCAQMD significance thresholds for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5} during Project construction.

Operational Emissions

The Project involves development of an 11-unit apartment complex. Operation of the Project would generate VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5} emissions from mobile sources, including vehicle trips from future residents; area sources, including the use of consumer products, architectural coatings for repainting, and landscape maintenance equipment; and energy sources. As discussed previously, this analysis quantified pollutant emissions associated with long-term operations using CalEEMod. The analysis estimated project-generated mobile source emissions on Project-specific trip rates. CalEEMod used default values to estimate emissions from the Project area and energy sources.

Table 5 presents the maximum daily area, energy, and mobile source emissions associated with operation (year 2022) of the Project. The values shown are the maximum summer or winter daily emissions results from CalEEMod. Appendix A provides details of the emission calculations.

Table 5. Estimated Maximum Daily Operational Criteria Air Pollutant Emissions

Emission Source	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	<i>Pounds per Day</i>					
Area	3	<1	7	<1	1	1
Energy	<1	<1	<1	<1	<1	<1
Mobile	<1	1	2	<1	1	<1
Total	3	1	8	<1	1	1
<i>SCAQMD Threshold</i>	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter; SCAQMD = South Coast Air Quality Management District.

See Appendix A for complete results.

Values of "<0.01" indicate that the estimated emissions are less than two decimals. The values shown are the maximum summer or winter daily emissions results from CalEEMod. The total values may not add up exactly due to rounding.

As shown in Table 5, the combined daily area, energy, and mobile source emissions would not exceed the SCAQMD operational thresholds for VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5}.

As discussed previously, the EPA and CARB has designated the SCAB as a federal nonattainment area for O_3 and $PM_{2.5}$, and a state nonattainment area for O_3 , PM_{10} , and $PM_{2.5}$. Construction and operational activities of the Proposed Project would generate VOC and NO_x emissions (precursors to O_3) and emissions of PM_{10} and $PM_{2.5}$. However, as indicated in Tables 3 and 5, Project-generated emissions would be minimal and would not exceed the SCAQMD emission-based significance thresholds for VOCs, NO_x , PM_{10} , or $PM_{2.5}$.

Cumulative localized impacts would potentially occur if construction of a project were to occur concurrently with another off-site project. Schedules for potential future projects near the Project area are currently unknown; therefore, pursuant to CEQA Guidelines Section 15145, potential impacts associated with two or more simultaneous projects would be speculative.⁵ However, future projects would be subject to CEQA and would require air quality analysis and, where necessary, mitigation. The implementation of control measures required by SCAQMD would reduce criteria air pollutant emissions associated with construction activity of future projects. SCAQMD Rule 403 Fugitive Dust, which sets forth general and specific requirements for all sites in the SCAQMD, and SCAQMD Rule 1113, which regulates VOC emissions in architectural coatings, would reduce cumulative PM_{10} , $PM_{2.5}$, and VOC emissions.

Based on the preceding considerations, the Project would not result in a cumulatively considerable increase in emissions of nonattainment pollutants, and impacts would be less than significant during construction and operation.

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

Less-than-Significant Impact. The following analysis assesses localized Project impacts associated with construction criteria air pollutants emissions.

Sensitive Receptors

Sensitive receptors are those individuals more susceptible to the effects of air pollution than the population at large. Air pollution is most likely to affect children, the elderly, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993). The closest sensitive receptor land uses are multifamily residences adjacent to the Project site to the north and east.

Localized Significance Thresholds

The SCAQMD recommends a localized significance threshold (LST) analysis to evaluate localized air quality impacts to sensitive receptors in the immediate vicinity of the Project site because of construction activities. The impacts were analyzed using methods consistent with those in the SCAQMD's Final Localized Significance Threshold Methodology (SCAQMD 2009). The Project is located in Source Receptor Area (SRA) 17 (Central Orange County). The Project's construction activities would occur over a 0.36-acre area; therefore, the LST analysis based its emissions thresholds on a 1-acre site. This is a conservative approach, as LSTs increase with the size of a project site. As mentioned previously, the closest sensitive receptors are

⁵ The CEQA Guidelines state that if a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact (14 CCR 15145).

multifamily residences adjacent to Project site to the north and east. The LSTs assumed for a distance of 25 meters, which is the shortest distance that the SCAQMD lookup tables provide for this analysis.

Project construction activities would result in temporary sources of on-site criteria air pollutant emissions associated with construction equipment exhaust and dust-generating activities. The maximum daily on-site construction emissions generated during construction of the Project is presented in Table 6 and compared to the SCAQMD localized significance criteria for SRA 17 to determine whether Project-generated, on-site construction emissions would result in potential LST impacts.

Table 6. Construction Localized Significance Thresholds Analysis

	NO ₂	CO	PM ₁₀	PM _{2.5}
Year	<i>Pounds per Day (on site)</i>			
2021	22	8	1	1
SCAQMD LST Criteria	188	3,351	63	26
Threshold Exceeded?	No	No	No	No

Source: SCAQMD 2009.

Notes: NO₂ = nitrogen dioxide; CO = carbon monoxide; PM₁₀ = particulate matter; PM_{2.5} = fine particulate matter; SCAQMD = South Coast Air Quality Management District; LST = localized significance threshold.

See Appendix A for detailed results.

Localized significance thresholds are shown for a 1-acre project site corresponding to a distance to a sensitive receptor of 82 feet (25 meters).

These estimates reflect control of fugitive dust required by Rule 403.

Greatest on-site CO emissions was from the building construction phase. The greatest PM₁₀ and PM_{2.5} emissions are associated with the grading phase while greatest NO₂ are associated with the architectural coating phase.

As shown in Table 6, proposed construction activities would not generate emissions in excess of site-specific LSTs; therefore, localized Project construction impacts would be less than significant. No mitigation is required.

CO Hotspots

Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed federal and/or state standards for CO are termed CO "hotspots." CO transport is extremely limited, because CO disperses rapidly with distance from the source. Under certain extreme meteorological conditions, however, CO concentrations near a congested roadway or intersection may reach unhealthy levels, affecting sensitive receptors. Typically, high CO concentrations are associated with severely congested intersections. Projects contributing to adverse traffic impacts may result in the formation of CO hotspots and require additional analysis if a project would result in a significant impact or contribute to an adverse traffic impact at a signalized intersection that would potentially subject sensitive receptors to CO hotspots. During construction of the Project, construction traffic would affect the intersections near the Project Site. However, construction activities would be temporary. Regarding long-term mobile-source emissions, the Project would not generate a substantial amount of traffic that would contribute to potential adverse traffic impacts that may result in the formation of CO hotspots. In addition, due to continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SCAB is steadily decreasing. Finally, as discussed in the Traffic Impact Analysis, all existing study intersections within the Project area would continue to operate at acceptable Level-of-Service after development of the

Project. Therefore, the Project would not generate additional traffic volumes, and impacts related to CO hot spots would be less than significant.

Toxic Air Contaminants

Toxic air contaminants (TACs) are defined as substances that may cause or contribute to an increase in deaths or in serious illness, or that may pose a present or potential hazard to human health. As discussed under the LST analysis, the nearest sensitive receptors to the Project are multifamily residences located adjacent to the Project site to the north and east.

Health effects from carcinogenic air toxics are usually described in terms of cancer risk. The SCAQMD recommends an incremental cancer risk threshold of 10 in 1 million. "Incremental cancer risk" is the net increased likelihood that a person continuously exposed to concentrations of TACs resulting from a project over a 9-, 30-, and 70-year exposure period will contract cancer based on the use of standard Office of Environmental Health Hazard Assessment risk-assessment methodology (OEHHA 2015). In addition, some TACs have non-carcinogenic effects. The SCAQMD recommends a Hazard Index of 1 or more for acute (short-term) and chronic (long-term) non-carcinogenic effects.⁶ TACs that the Project would potentially emit during construction activities associated with diesel particulate matter.

The Project would include diesel particulate matter emissions from heavy equipment operations and heavy-duty trucks. Heavy-duty construction equipment is subject to a CARB Airborne Toxics Control Measure for in-use diesel construction equipment to reduce diesel particulate emissions. As described for the LST analysis, PM₁₀ and PM_{2.5} (representative of diesel particulate matter) exposure would be minimal. According to the Office of Environmental Health Hazard Assessment, health risk assessments (which determine the exposure of sensitive receptors to toxic emissions) should be based on a 30-year exposure period for the maximally exposed individual resident; however, such assessments should also be limited to the period/duration of activities associated with the Proposed Project. The duration of the proposed construction activities would constitute a small percentage of the total 30-year exposure period. The construction period for the Project would be approximately 6 months, after which construction-related TAC emissions would cease. Due to this relatively short period of exposure and minimal particulate emissions on site, TACs generated during construction would not be expected to result in concentrations causing significant health risks.

Following completion of on-site construction activities, the Project would not involve routine operational activities that would generate TAC emissions. Operation of the Project would not result in any non-permitted direct emissions (e.g., those from a point source such as diesel generators). For the reasons previously described, the Proposed Project would not result in substantial TAC exposure to sensitive receptors near the Project Site, and impacts would be less than significant.

⁶ This analysis measures non-cancer adverse health risks against a hazard index, which is defined as the ratio of the predicted incremental exposure concentrations of the various non-carcinogens from the project to published reference exposure levels that can cause adverse health effects.

Health Effects of Criteria Air Pollutants

Construction and operation of the Project would generate criteria air pollutant emissions; however, the Proposed Project would not exceed the SCAQMD mass-emission thresholds, as shown in Tables 4 and 5.

VOCs would be associated with motor vehicles, construction equipment, and architectural coatings; however, Project-generated VOC emissions would not result in the exceedances of the SCAQMD thresholds. Generally, the VOCs in architectural coatings are of relatively low toxicity. Additionally, SCAQMD Rule 1113 restricts the VOC content of coatings for both construction and operational applications. VOCs and NO_x are precursors to O₃, for which the EPA and CARB designates the SCAB as nonattainment with respect to the NAAQS and CAAQS. The health effects associated with O₃ are generally associated with reduced lung function. The contribution of VOCs and NO_x to regional ambient O₃ concentrations is the result of complex photochemistry. The increases in O₃ concentrations in the SCAB due to O₃ precursor emissions tend to be downwind from the source location to allow time for the photochemical reactions to occur. However, the potential for exacerbating excessive O₃ concentrations would also depend on the time of year that the VOC emissions would occur because exceedances of the O₃ NAAQS and CAAQS tend to occur between May and October when solar radiation is highest. The holistic effect of a single project's emissions of O₃ precursors is speculative due to the lack of quantitative methods to assess this impact. Nonetheless, because VOC and NO_x emissions associated with construction and/or operation would not exceed the SCAQMD daily thresholds (as depicted in Tables 4 and 5), this analysis finds that the Project would not contribute substantially to regional O₃ concentrations and the associated health effects. Therefore, impacts are less than significant. No mitigation is required.

As shown in Tables 4 and 5, construction and operation of the Project would not exceed thresholds for PM₁₀ or PM_{2.5} and would not contribute to exceedances of the NAAQS and CAAQS for particulate matter or obstruct the SCAB from coming into attainment for these pollutants. Additionally, the Proposed Project would implement dust control strategies and be required to comply with SCAQMD Rule 403, which limits the amount of fugitive dust generated during construction. Due to the minimal contribution of particulate matter during construction and operation, this analysis finds that health impacts would be less than significant. No mitigation is required.

Construction and operation of the Project would not contribute to exceedances of the NAAQS and CAAQS for NO₂. Health impacts that result from NO₂ include respiratory irritation, which nearby receptors could experience during the periods of heaviest use of off-road construction equipment. However, Proposed Project construction would be relatively short term, and off-road construction equipment would be operating at various portions of the site and would not be concentrated in one portion of the Project Site at any one time. In addition, existing NO₂ concentrations in the area are well below the NAAQS and CAAQS standards. As indicated in Table 6, construction of the Project would result in a minimal increase in localized NO₂ emissions and would not contribute to exceedances of the NAAQS and CAAQS for NO₂. Therefore, the Project would not result in substantial NO₂ emissions or the potential health effects associated with NO₂. Impacts would be less than significant. No mitigation is required.

CO tends to be a localized impact associated with congested intersections. In terms of adverse health effects, CO competes with oxygen, often replacing it in the blood, thereby reducing the blood's ability to transport oxygen to vital organs. The results of excess CO exposure can include dizziness, fatigue, and impairment of central nervous system functions. This analysis previously states that CO hotspots were a

less-than-significant impact. Thus, the Project's CO emissions would not contribute to the health effects associated with this pollutant. In summary, health impacts of criteria air pollutants would be less than significant, and no mitigation is required.

Based on the preceding considerations, this analysis finds that health impacts associated with criteria air pollutants would be less than significant.

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

Less-than-Significant Impact. The occurrence and severity of potential odor impacts depend on numerous factors. The nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying, cause distress among the public, and generate citizen complaints.

During Project construction, exhaust from equipment may produce discernible odors typical of most construction sites. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment. However, such odors would disperse rapidly from the Project Site and generally occur at magnitudes that would not affect substantial numbers of people. Accordingly, impacts associated with odors during construction would be less than significant.

Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (SCAQMD 1993). Operation of the Project would not entail any of these potentially odor-causing land uses. Therefore, the Project would not create any new sources of odor during operation and would result in a less than significant odor impact.

3.4 Biological Resources

	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
IV. 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 Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

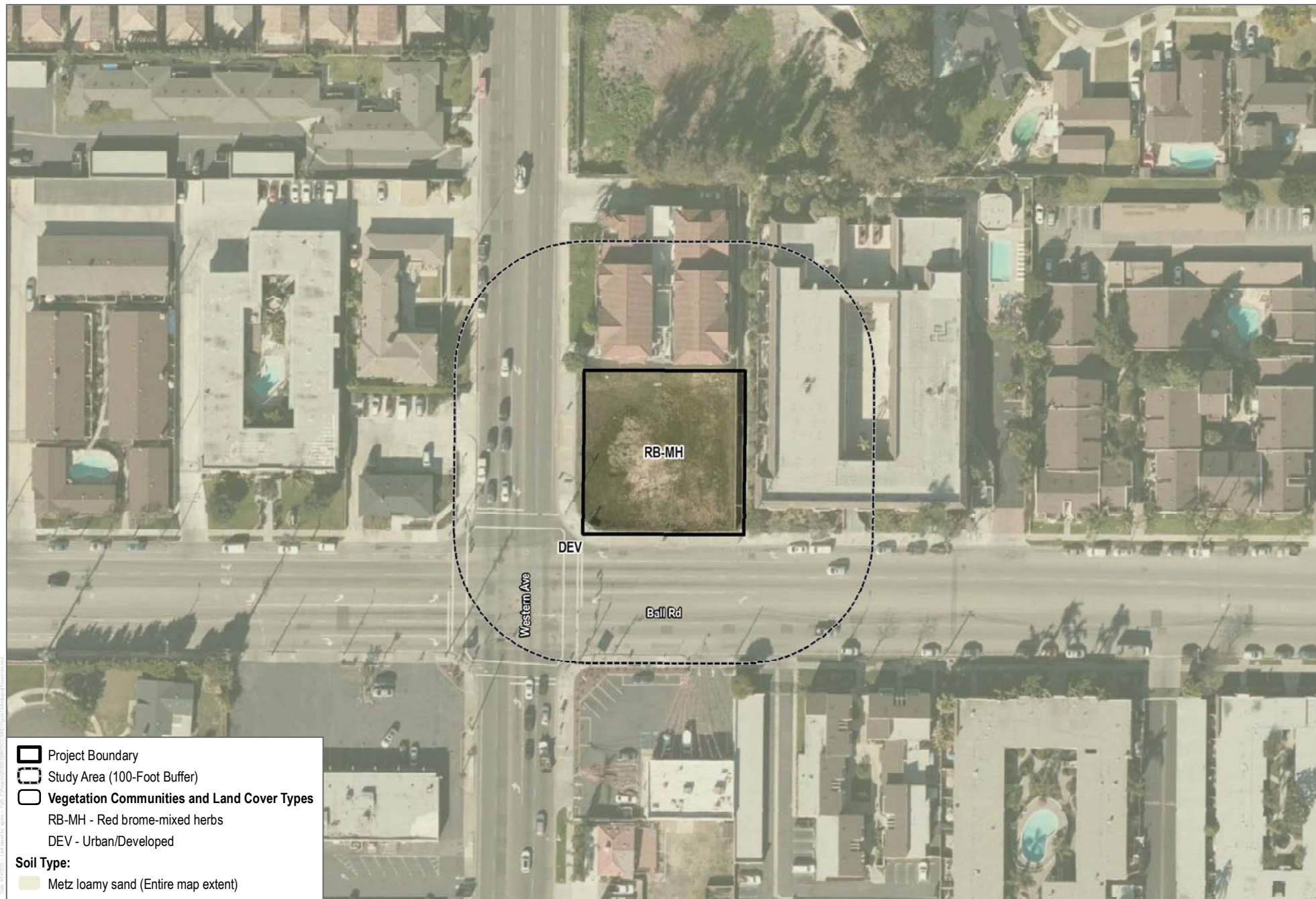
The following analysis relies on a biological resources assessment conducted by Dudek Biologist Tommy Molioo in April 2019. This assessment included a review of the latest available relevant literature, published research, maps, soil data, data on biological baselines, special-status habitats, and species distributions to determine those biological resources that have the potential to occur within the Project Site. To account for potential impacts that could occur to biological resources in the Project vicinity, this analysis covers the Project site and includes a 100-foot buffer around the Project Site (the Study Area). A field survey was conducted to characterize the environmental conditions, vegetation communities/land covers, and any plants or wildlife (including their habitats) within the Study Area that could be impacted during Project implementation. During the field survey, the Dudek Biologist catalogued and confirmed the existing conditions of vegetation communities and land covers. Vegetation communities were mapped according to the California Department of Fish and Wildlife (CDFW) List of Vegetation Alliances and Associations (or Natural Communities List), which is based on A Manual of California Vegetation, 2nd edition (Sawyer et. al. 2009). Dudek compiled a general inventory of plant and wildlife species detected by sight, calls, tracks, scat, or other field indicators, and made a determination concerning the potential for special-status species to occur within the Study Area. Additionally, Dudek conducted a preliminary investigation of the extent and distribution of jurisdictional waters of the United States regulated by the U.S. Army Corps of Engineers, jurisdictional waters of the state regulated by the SARWQCB, and CDFW jurisdictional streambed and associated riparian habitat.

Dudek searched the CDFW's California Natural Diversity Database (CDFW 2019a, 2019b, 2019c, 2020a, 2020b) and the California Native Plant Society's Inventory of Rare and Endangered Plants (CNPS 2020) to identify special-status biological resources from the region (Appendix B). Dudek searched the California Natural Diversity Database and California Native Plant Society based on the U.S. Geological Survey 7.5-minute topographic quadrangle map for Los Alamitos, where the Study Area is located, as well as the surrounding seven 7.5-minute quadrangle maps (i.e., Anaheim, South Gate, La Habra, Long Beach, Seal Beach, Newport Beach, and Whittier). Potential and/or historic drainages and aquatic features were investigated based on a review of U.S. Geological Survey topographic maps (1:24,000 scale), aerial photographs, the National Wetland Inventory database (USFWS 2020), and the Natural Resources Conservation Service Web Soil Survey (USDA 2020).

The Study Area contains disturbed and developed land due to previous development in west Anaheim. The Project Site has been a vacant lot since at least 1988, and has been subject to regular weed abatement activities that have resulted in a vegetation community dominated by non-native grasses and ruderal (weedy) forbs. There are no existing developments or structures on the Project Site. The site is relatively flat with an elevation of approximately 60 feet above mean sea level. There are no significant topographic features on the Project Site or in adjacent off site areas as the surrounding land use consists of residential and commercial development. No native vegetation communities or natural habitats occur on the Project Site, and several ornamental trees are located immediately adjacent to the Project Site associated with adjacent residential buildings.

The vegetation communities mapped for the Study Area include red brome-mixed herbs (RB-MH) and urban/developed land (DEV) as depicted on Figure 10, Biological Resources. Dominant plant species include red brome (*Bromus rubens madritensis*), wild oats (*Avena fatua*), filaree (*Erodium botrys*), short-podded mustard (*Hirschfeldia incana*), and bristly ox-tongue (*Helminthotheca echioides*). A limited number of wildlife species commonly found in urban settings were observed or detected during the field survey of the Study Area, including house finch (*Haemorhous mexicanus*), common raven (*Corvus corax*), and mourning dove (*Zenaidura macroura*). Other species expected to occur include house sparrow (*Passer domesticus*), California ground squirrel (*Spermophilus beecheyi*), and western fence lizard (*Sceloporus occidentalis*). According to soil maps prepared by the Natural Resources Conservation Service, the Study Area is mapped as containing Metz loamy sand (USDA 2020).

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SOURCE: County of Orange 2020; USDA NRCS; Bing Maps

FIGURE 10
Biological Resources
3175 West Ball Road

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

Less-than-Significant Impact. The Project Site is located within an entirely disturbed area surrounded by developed land. The vegetation on the Project Site consists of non-native grasses and ruderal (weedy) forbs that the property owner typically mows for weed abatement activities. No natural habitats occur on the Project Site, and the observed surface soils are significantly disturbed. The habitat quality on the Project Site is of very low value and does not provide suitable habitat to support any species that the CDFW or U.S. Fish and Wildlife Service identifies as a protected, candidate, sensitive, or special-status species in local or regional plans, policies, or regulations.

Although development of the Proposed Project would not affect trees, several ornamental trees (that are part of the adjacent residential developments' landscaping) are located adjacent to the eastern and northern boundaries of the Project Site, which could provide suitable habitat for nesting birds. The Migratory Bird Treaty Act and California Fish and Game Code 3500 et seq. further protect birds and their nests. The Proposed Project would not remove these trees, reducing the potential for a significant direct impact to occur. However, due to the proximity of the trees to the Project Site, implementation of the Proposed Project may result in an indirect impact from construction noise and increased human disturbance if construction activities occur during the general avian nesting season from February through August. California Fish and Game Code Sections 3503, 3503.5, 3513, and 3800, require the avoidance of the incidental loss of fertile eggs or nestlings, or activities that lead to nest abandonment. To avoid potential indirect impacts to nesting birds in conformance with the Migratory Bird Treaty Act and California Fish and Game Code, Mitigation Measure (MM-) BIO-1 would be required. MM-BIO-1 would require the Project Applicant to retain a qualified biologist to conduct pre-construction nesting bird surveys to ensure that no nests are located within the ornamental trees adjacent to the Project Site, in accordance with CDFW requirements, if construction activities were to occur during nesting season (typically between February 1 and September 1). Compliance with MM-BIO-1 and conformance with the Migratory Bird Treaty Act and California Fish and Game Code would ensure that the Proposed Project would not result in impacts to a protected bird species. Impacts associated with protected bird species would be less than significant after mitigation. Therefore, impacts to special-status plant and wildlife species would be less-than-significant.

MM-BIO-1 Prior to the issuance of a demolition, grading, and/or building permit for activities during the avian nesting season (i.e., February 1 and September 1), the property owner/developer shall submit a survey for active nests to the City of Anaheim Planning and Building Department conducted by a qualified biologist a maximum of 1 week prior to the activities to determine the presence/absence, location, and status of any active nests on or adjacent to the Project Site. The nesting bird survey shall consist of full coverage of the project footprint and an appropriate buffer, as determined by the biologist. If no active nests are discovered or identified, no further mitigation is required. In the event that active nests are discovered on site, a suitable buffer determined by the biologist (e.g., 30 to 50 feet for passerines) shall be established around any active nest. No ground-disturbing activities shall occur within this buffer until the biologist has confirmed that breeding/nesting is completed and the young have fledged the nest. Limits of construction to avoid a nest shall be established in the field by the biologist with flagging and stakes or construction fencing. Construction personnel shall be instructed regarding the ecological sensitivity of the fenced

area. The results of the survey shall be documented and filed with the City of Anaheim within 5 days after the survey.

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

No Impact. The Project Site is located within an upland area⁷ characterized by disturbed habitat and surrounded by existing development. There are no riparian habitats or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or U.S. Fish and Wildlife Service on the Project Site or in the immediate vicinity. Therefore, the Proposed Project would result in no impact to riparian habitat or other sensitive natural communities.

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

No Impact. The Project Site is located within an upland area characterized by disturbed habitat and surrounded by existing development. There are no drainages or watercourses on site or within the vicinity of the site. There are no wetlands mapped for the site on the National Wetlands Inventory (USFWS 2020), and the Dudek Biologist did not observe any wetlands or areas capable of supporting wetlands during the survey. The Project Site lacks suitable hydrology, soils, and vegetation to support wetland features. Therefore, the Proposed Project would have no impact on state or federally protected waters or wetlands.

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

No Impact. Meffe and Carrol (1997) define wildlife movement corridors, also referred to as dispersal corridors or landscape linkages, as linear features along which animals can travel from one habitat or resource area to another. The Project Site does not contain any greenbelts for wildlife movement or native vegetation capable of supporting the movement of wildlife, particularly corridors that facilitate movement of species between larger stands of native habitat. Construction of the Proposed Project would not result in the encroachment into or impediment of a wildlife corridor or nursery site that local wildlife could use. Therefore, the Proposed Project would have no impact on wildlife movement corridors or wildlife nursery sites.

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

No Impact. The Project Site is located within an entirely developed area in the City of Anaheim. Sections 11.12 and 13.12 of the Anaheim Municipal Code address the protection of landmark trees and street trees, respectively. No landmark tree shall be removed without prior approval of the City Council. Additionally, no person shall cut, trim, prune, plant, remove, spray, or in any other manner interfere with any street tree within the City without first having secured written permission from the Director of Community Services or his or her

⁷ According to the Army Corps of Engineers Wetland Delineation Manual, uplands are defined as any area that does not qualify as a wetland because the associated hydrologic regime is not sufficiently wet to elicit development of vegetation, soils, and/or hydrologic characteristics associated with wetlands (ACOE 1987).

designee. The Proposed Project would not result in the removal of any landmark trees or street trees as none are located within the Project Site, and the Proposed Project would not affect trees that are located beyond the eastern and northern boundaries of the Project Site. Additionally, Sections 18.18.30 and 18.18.040 provide regulations to preserve significant stands and single specified trees in the (SC) Overlay Zone to preserve the natural beauty of the Santa Ana Canyon environment. However, the Project is not located within the SC Overlay Zone⁸, and the Proposed Project would not conflict with the provisions of Sections 18.18.30 and 18.18.040 of the Anaheim Municipal Code. Therefore, the Proposed Project would not conflict with any local policies or ordinances protecting biological resources, and no impact would occur.

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

No Impact. The Project Site is not located within a Habitat Conservation Plan, Natural Community Conservation Plan, or similar plan. The Project Site is not located within or proximate to any Significant Ecological Area, Land Trust, or Conservation Plan. As such, construction of the Proposed Project would not conflict with an adopted conservation plan, and no impact would occur.

3.5 Cultural Resources

	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The basis for the following analysis is a Cultural Resources Report prepared for the Project Site in May 2019 by Dudek (Appendix C). As part of Cultural Resources Report, recent photographs of the Project Site, historic maps, aerial photographs, a California Historical Resources Information System records search conducted at the South Central Coast Information Center, a Native American Heritage Commission Sacred Lands File search, informal tribal consultation, and an intensive pedestrian survey were conducted.

⁸ Section 18.18.020 defines the SC Overlay Zone boundaries as the area of the City lying easterly of the intersection of the State Route 55/Costa Mesa and State Route 91/Riverside Freeways, westerly of the Orange County line, southerly of the Atchison, Topeka and Santa Fe Railroad right-of-way, and northerly of the present or any future south city limits of the City of Anaheim, with the exception of those properties within the Anaheim Canyon Specific Plan No. 2015-01 (SP2015-01) Zone.

- a) *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*

Less-than-Significant Impact. An E-Z Service Gas Station previously occupied the Project site from the early 1960s until it was demolished in 1988. The E-Z Service Gas station contained three USTs, including two 10,000-gallon tanks and one 500-gallon tank, which were also removed in 1988. Remediation efforts were conducted on the Project Site by hazardous materials specialists under contract with property owner at the time and under the oversight of the SARWQCB between 1988 and 2000, which involved extensive ground disturbance, including the removal of over 3,000 tons of petroleum-contaminated soil. The extensive amount of ground disturbance that has occurred on the Project Site for the construction and the demolition of the E-Z Service Gas Station, as well the ground disturbance associated with the remediation efforts, has likely destroyed any historical or archaeological deposits that may have once been present on the Project Site. In addition, Dudek did not identify any archaeological resources within the Project Site during the South Central Coast Information Center records search, the intensive pedestrian survey, the Native American Heritage Commission Sacred Lands File search or informal tribal consultation, or through Assembly Bill (AB) 52 and Senate Bill (SB) 18 consultation conducted by the City. Further, Dudek did not identify any prehistoric or historic archaeological resources within a 1-mile radius of the Project Site. Considering these factors, the likelihood that there are prehistoric or historic archaeological deposits on the Project Site would be low. As such, the Proposed Project would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5, and impacts would be less than significant.

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

Less-than-Significant-impact. As discussed above, the Project Site has been subject to extensive ground disturbance associated with construction, demolition, and remediation of an EZ-Service Gas Station, which involved removal of over 3,000 tons of petroleum-contaminated soil from the Project Site. Dudek did not identify any archaeological resources on the Project Site during the South Central Coast Information Center records search, the intensive pedestrian survey, the Native American Heritage Commission Sacred Lands File search or informal tribal consultation, or through AB 52 and SB 18 consultation conducted by the City. Further, Dudek did not identify any prehistoric or historic archaeological resources within a 1-mile radius of the Project Site. As such, the Proposed Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5, and impacts would be less than significant.

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

Less-than-Significant Impact with Mitigation Incorporated. As discussed above, the Project Site has been subject to extensive ground disturbance associated with construction, demolition, and remediation of an EZ-Service Gas Station. Nevertheless, because there is always the possibility, although extremely unlikely in this case, that human remains could be encountered during grading, MM-CUL-1 shall be required. MM-CUL-1 outlines procedures that would be implemented if skeletal remains are uncovered during construction activities in conformance with California Health and Safety Code, Section 7050.5, which includes stopping all construction work, notifying the county coroner immediately, and identifying a most likely descendant. With implementation of MM-CUL-1, impacts would be less than significant with mitigation incorporated.

- MM-CUL-1** If skeletal remains are uncovered during construction activities, all work shall stop immediately and the construction supervisor in charge at the Project Site shall notify the County Coroner of the find immediately, in conformance with the California Health and Safety Code, Section 7050.5. No further disturbance shall occur until the County Coroner makes a determination of origin and disposition pursuant to California Public Resources Code, Section 5097.98. If the human remains are determined to be prehistoric, the County Coroner shall notify the Native American Heritage Commission, which shall notify a most likely descendant. The most likely descendant shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials subject to City approval.

3.6 Energy

	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
VI. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) *Would the project 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. The short-term construction and long-term operation of the Project would require the consumption of energy resources in several forms at the Project Site and within the Project area. Construction and operational energy consumption is evaluated in detail below.

Energy Overview

Electricity

The City of Anaheim Public Utilities Department provides electricity service to the Project Site. Anaheim Public Utilities Department provides electric service to approximately 358,000 people and businesses across a 50-square-mile service area. According to the California Energy Commission, approximately 2,306 gigawatt-hours of electricity were used in Anaheim Public Utilities Department's service area in 2018 (CEC 2019a). According to the Anaheim Public Utilities 2017 Power Content Label, 34% of Anaheim Public Utilities Department's power came from renewable energy sources in 2017, including biomass/waste,

geothermal, hydroelectric, solar, and wind sources (APUD 2017). Due to the state's energy efficiency building standards and efficiency and conservation programs, California's electricity use per capita has remained stable for more than 30 years, while the national average has steadily increased (CEC 2015).

Natural Gas

SoCalGas serves the Project area. SoCalGas serves 21.6 million customers in a 20,000-square-mile service area that includes over 500 communities (SoCalGas 2020). In 2018 (the most recent year for which data is available), SoCalGas delivered 5,156 million therms of natural gas, with the majority going to residential uses (CEC 2019b). Demand for natural gas can vary depending on factors such as weather, price of electricity, the health of the economy, environmental regulations, energy-efficiency programs, and the availability of alternative renewable energy sources. Natural gas is available from a variety of in-state and out-of-state sources and is provided throughout the state in response to market supply and demand.

Petroleum

Transportation accounts for the majority of California's total energy consumption. According to the California Energy Commission, California used approximately 16 billion gallons of petroleum in 2019 (CEC 2019c). As technological advances, market trends, consumer behavior, and government policies could result in significant changes in fuel consumption by type and in total. At the federal and state levels, various policies, rules, and regulations have been enacted to improve vehicle fuel efficiency, promote the development and use of alternative fuels, reduce transportation-source air pollutants and GHG emissions, and reduce vehicle miles traveled (VMT).

Construction

Electricity

Anaheim Public Utilities Department would provide temporary electric power for as-necessary lighting and electronic equipment. The amount of electricity used during construction would be minimal, because typical demand would stem from electrically powered hand tools. The electricity used for construction activities would be temporary and minimal; therefore, Project construction would not result in wasteful, inefficient, or unnecessary consumption of electricity. Impacts would be less than significant.

Natural Gas

The Project Applicant does not anticipate the Proposed Project requiring natural gas during Project construction. Fuels used for construction would primarily consist of diesel and gasoline, discussed below. Any minor amounts of natural gas that Project construction activities may consume would be temporary and negligible and would not have an adverse effect; therefore, Project construction would not result in wasteful, inefficient, or unnecessary consumption of natural gas. Impacts would be less than significant.

Petroleum

Construction activities would require petroleum consumption throughout construction. Fuel consumed by construction equipment would be the primary energy resource expended over the course of construction. Transportation of construction materials and construction workers would also result in petroleum consumption. Heavy-duty construction equipment, vendor trucks, and haul trucks would use diesel fuel. Construction workers

would likely travel to and from the Project area in gasoline-powered vehicles. For purposes of modeling, it was assumed that construction would occur over a 6-month period as early as 2021.

Heavy-duty construction equipment associated with construction activities would rely on diesel fuel, as would haul and vendor trucks involved in delivery of materials to the Project Site. Construction workers would travel to and from the Project Site throughout the duration of construction. This analysis assumes that construction workers would travel to and from the site in gasoline-powered light-duty vehicles.

The Project Applicant would use heavy-duty construction equipment of various types during Project construction. Appendix A lists the assumed equipment usage for construction. As presented in Table 7, Hours of Operation for Construction Equipment, the analysis estimates that the Project's construction equipment would operate a total combined 3,513 hours.

Table 7. Hours of Operation for Construction Equipment

Phase	Hours of Equipment Use
Site Preparation	16
Grading	42
Building Construction	3,200
Paving	225
Architectural Coating	30
Total	3,513

Source: See Appendix A for details.

The analysis estimated fuel consumption from construction equipment by converting the total carbon dioxide (CO₂) emissions from each construction phase to gallons using the conversion factors for CO₂ to gallons of gasoline or diesel. The conversion factor for gasoline is 8.78 kilograms per metric ton CO₂ per gallon, and the conversion factor for diesel is 10.21 kilograms per metric ton CO₂ per gallon (The Climate Registry 2019). The estimated diesel fuel usage from construction equipment is shown in Table 8, Construction Equipment Diesel Demand

Table 8. Construction Equipment Diesel Demand

Phase	Pieces of Equipment	Equipment CO ₂ (MT) ^a	kg CO ₂ /Gallon ^b	Gallons
Site Preparation	2	0.43	10.21	41.88
Grading	4	1.05	10.21	101.95
Building Construction	5	50.43	10.21	4,901.18
Paving	7	2.35	10.21	229.98
Architectural Coating	1	0.64	10.21	62.52
Total				5,337.50

Sources:

^a See Appendix A for details.

^b The Climate Registry 2019.

Notes: CO₂ = carbon dioxide; MT = metric ton; kg = kilogram;.

Fuel consumption from worker and vendor trips was estimated by converting the total CO₂ emissions from the construction phase to gallons using the conversion factors for CO₂ to gallons of gasoline or diesel. Worker vehicles are assumed to be gasoline-fueled, and vendor/hauling vehicles are assumed to be diesel-fueled.

Calculations for total worker and vendor fuel consumption are provided in Table 9, Construction Worker Vehicle Gasoline Demand, and Table 10, Construction Vendor Truck Diesel Demand.

Table 9. Construction Worker Vehicle Gasoline Demand

Phase	Trips	Vehicle CO ₂ (MT) ^a	kg CO ₂ /Gallon ^b	Gallons
Site Preparation	6	0.03	8.78	3.27
Grading	20	0.10	8.78	10.89
Building Construction	1,200	5.73	8.78	653.08
Paving	90	0.43	8.78	48.99
Architectural Coating	10	0.05	8.78	5.44
Total				721.67

Sources:

^a See Appendix A for details.

^b The Climate Registry 2019.

Notes: CO₂ = carbon dioxide; MT = metric ton; kg = kilogram.

Table 10. Construction Vendor Truck Diesel Demand

Phase	Trips	Vehicle CO ₂ (MT) ^a	kg CO ₂ /Gallon ^b	Gallons
Site Preparation	0	0.00	10.21	0.00
Grading	0	0.00	10.21	0.00
Building Construction	400	4.88	10.21	478.25
Paving	0	0.00	10.21	0.00
Architectural Coating	0	0.00	10.21	0.00
Total				478.25

Sources:

^a See Appendix A for details.

^b The Climate Registry 2019.

Notes: CO₂ = carbon dioxide; MT = metric ton; kg = kilogram.

As shown in Tables 8 through 10, the analysis estimates that the Project would consume approximately 6,537 gallons of petroleum during the construction phase. For comparison, the state of California will likely consume approximately 9 billion gallons of petroleum over the course of the Proposed Project's construction phase, based on the California daily petroleum consumption estimate of approximately 78.6 million gallons per day (EIA 2019). Overall, because petroleum use during construction would be temporary, and would not be wasteful or inefficient, impacts would be less than significant.

Operation

Electricity

At full buildout, the Project's operational phase would require electricity. CalEEMod default values for electricity consumption for the apartments mid-rise land use were applied (CAPCOA 2017). The California Building Standards Commission approved and adopted the 2019 Title 24 standards in December 2018.

The 2019 standards became effective January 1, 2020. However, the most recent version of CalEEMod, which this analysis used, uses the 2016 version of Title 24 as a basis for energy modelling.

Table 11, Estimated Electrical Demand – Project Operation, provides operational electricity use for the Project.

Table 11. Estimated Electrical Demand – Project Operation

Land Use Type	Estimated Electrical Demand Anaheim Public Utilities Department (kilowatt-hours per year)
Apartments Mid-Rise	43,728

Source: See Appendix A for details.

As shown in Table 11, this analysis estimates that the Project would have a total electrical demand of approximately 43,728 kilowatt-hours per year. By comparison, in 2018, Anaheim Public Utilities Department supplied 2,306 gigawatt-hours of electricity to customers (CEC 2019a). Therefore, the Proposed Project would not result in a wasteful use of energy. Impacts related to operational electricity use would be less than significant.

Natural Gas

Building heating options would be the primary consumer of natural gas throughout operation of the Project. As described above and consistent with electricity use, this analysis estimated the Project's natural gas use using CalEEMod.

Table 12, Estimated Natural Gas Demand – Project Operation, shows the estimated natural gas use (in therms per year) for the Project during operation.

Table 12. Estimated Natural Gas Demand – Project Operation

Land Use Type	Estimated Natural Gas Demand (therms per year)
Apartments Mid-Rise	125,702

Source: See Appendix A for details.

As presented in Table 12, the analysis estimates that the Project would use approximately 125,702 therms of natural gas per year. By comparison, in 2018, SoCalGas supplied 5,156 million therms of natural gas to customers (CEC 2019b). Therefore, natural gas consumption impacts would be less than significant.

Petroleum

The majority of fuel consumption resulting from the Project's operational phase would be attributable to the use of visitor and delivery motor vehicles traveling to and from the Project site, as well as fuels used for alternative modes of transportation by visitors and deliveries.

Petroleum fuel consumption associated with motor vehicles traveling to and from the Project Site is a function of VMT because of Project operation. As shown in Appendix A, the analysis estimates that the annual vehicle VMT attributable to the Project would be approximately 244,326 VMT per year. Similar to

construction worker and vendor trips, the analysis estimated fuel consumption by converting the total CO₂ emissions to gallons using the conversion factors for CO₂ to gallons of gasoline or diesel. Based on the annual fleet mix provided in CalEEMod, the analysis assumed that 92.9% of the fleet range from light-duty to medium-duty vehicles and motorcycles would run on gasoline. The remaining 7.1% of vehicles represent medium-heavy duty to heavy-duty vehicles and buses/recreational vehicles, which would run on diesel.

Table 13, Mobile Source Fuel Consumption – Operation provides the calculations for annual mobile-source fuel consumption are provided in.

Table 13. Mobile Source Fuel Consumption – Project Operation

Fuel	Vehicle MT CO ₂	kg CO ₂ /Gallon	Gallons
Gasoline	94.94	8.78	10,813.72
Diesel	7.27	10.21	711.63
Total			11,525.35

Sources: See Appendix A for details (mobile source CO₂); The Climate Registry 2019 (kg/CO₂/gallon).

Notes: MT = metric ton; CO₂ = carbon dioxide; kg = kilogram.

As depicted in Table 13, Project operation would result in approximately 11,525 gallons of petroleum fuel usage per year. This is a conservative estimate, since it does not account for usage of electric vehicles (EVs). By comparison, California as a whole consumes approximately 28.7 billion gallons of petroleum per year (EIA 2019).

According to the U.S. Energy Information Administration, over the lifetime of the Project, the fuel efficiency of vehicles is expected to increase (EIA 2017). As such, the amount of petroleum consumed because of vehicular trips to and from the Project Site during operation would decrease over time. There are numerous regulations in place that require and encourage increased fuel efficiency, such as efforts to accelerate the number of plug-in hybrids and zero-emissions vehicles in California and increasingly stringent emissions standards (CARB 2011). As such, operation of the Project would use decreasing amounts of petroleum over time due to advances in fuel economy. Impacts related to operational petroleum use would therefore be less than significant.

In summary, although the Project would increase energy use, the use would be a small fraction of the statewide use and, due to efficiency increases, would diminish over time (particularly with respect to petroleum). Given these considerations, energy consumption associated with the Project would not be inefficient or wasteful and would result in a less than significant impact. No mitigation is required.

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

Less-than-Significant Impact. The Project would follow applicable energy standards and regulations during the construction phases. Part 6 of Title 24 of the California Code of Regulations was established in 1978 and serves to enhance and regulate California's building standards. Part 6 establishes energy efficiency standards for residential and nonresidential buildings constructed in California to reduce energy demand and consumption. The California Energy Commission updates Part 6 periodically (every 3 years) to incorporate and consider new energy efficiency technologies and methodologies. Title 24 also includes Part 11, California Green Building Standards Code (CALGreen). CALGreen institutes mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential and state-owned buildings, as well as, schools and

hospitals. The Project would meet all applicable Title 24 and CALGreen standards to reduce energy demand and increase energy efficiency. As such, impacts related to the Project's potential to conflict with plans for renewable energy and energy efficiency would be less than significant.

The Anaheim Public Utilities Department's Greenhouse Gas Reduction Plan (GHG Reduction Plan) demonstrates the City's commitment to pursue energy efficiency and reduce GHGs across the community and municipal operations (APUD 2015). The Project would be consistent with the intent of the Greenhouse Gas Reduction Plan since the Applicant has designed the Project to be inherently energy efficient by implementing measures as provided in the Title 24 and CALGreen standards. Homes built under the 2019 Standards will use about 7% less energy than the current 2016 standards. Furthermore, the 2019 Title 24 Standards require the construction of new residential buildings, to be solar ready to facilitate the installation of rooftop solar systems; this requirement would be applicable to the Proposed Project.

Overall, the Project would not conflict with existing energy standards and regulations; therefore, impacts during construction and operation of the Proposed Project would be less than significant. No mitigation is required.

3.7 Geology and Soils

	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
VII. 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) **Would the project 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.**

No Impact. The Alquist–Priolo Earthquake Zoning Act (Alquist–Priolo Act) requires the delineation of fault zones along active faults in California. The purpose of the Alquist–Priolo Act is to regulate development on or near active fault traces to reduce hazards associated with fault rupture. The Alquist–Priolo Earthquake Fault Zones are the regulatory zones that include surface traces of active faults. According to the City’s General Plan Safety Element (City of Anaheim 2020a), the City is located in an area considered to be seismically active, similar to most of Southern California. Active and potentially active faults are adjacent to the City. However, there are no faults underlying the City or any Alquist-Priolo Earthquake Fault Zones within the City. As such, although it is likely that the Project Site would experience strong ground shaking as a result of an earthquake over the life of the Proposed Project (refer to Section 3.7(a)(ii)), the Proposed Project would not be subject to surface rupture impacts as a result of a seismic event. Therefore, no impacts associated with fault rupture would occur.

ii) **Strong seismic ground shaking?**

Less-than-Significant Impact. Like most of Southern California, the Project Site is located within a seismically active area. Numerous faults considered active or potentially active have been mapped in Southern California, including within the City and in neighboring cities. Thus, the Proposed Project could expose future residents and their visitors to strong seismic ground shaking in the event of an earthquake.

According to the City’s General Plan Safety Element (City of Anaheim 2020a), the City is located between two major active fault zones: the Newport-Inglewood Fault Zone located to the southwest

and the Whittier-Elsinore Fault Zone located to the northeast. Both the Newport-Inglewood and the Whittier-Elsinore Faults are under the Alquist-Priolo Earthquake Fault Zoning Act. The Newport-Inglewood Fault Zone passes within approximately 7 miles of the western limits of the City. Although no onshore surface fault rupture has taken place since 1769, the Newport-Inglewood Fault Zone is capable of generating an earthquake with a magnitude of 6.9 on the Richter scale according to the City's General Plan EIR (City of Anaheim 2004).

The Whittier-Elsinore Fault Zone is the closest major fault system to the City and one of the largest in Southern California. The fault zone does not extend inside the City boundaries but approaches within less than 1 mile of the northeastern corner of the City. The Whittier-Elsinore Fault is currently active and capable of generating an earthquake of up to a magnitude of 6.8 on the Richter scale (City of Anaheim 2020a).

Appropriate measures to mitigate and minimize the effects of earthquakes and other geotechnical hazards are included in the California Building Code, with specific provisions pertaining to seismic load and design. The City of Anaheim has adopted the California Building Code as Chapter 15 (Building and Housing) of the Anaheim Municipal Code. The design and construction of the Proposed Project, in accordance with the California Building Code, would minimize the adverse effects of strong ground shaking to the greatest degree feasible during an earthquake.

In review, the Project Site is not in a considerably close range of an earthquake zone that would produce seismic activities that would cause surface ruptures. The City would require the Applicant to build the Proposed Project with geotechnical hazards that would comply with the California Building Code. Therefore, strong seismic ground shaking impacts would be less than significant.

iii) *Seismic-related ground failure, including liquefaction?*

Less-than-Significant Impact with Mitigation Incorporated. Soil liquefaction is a seismically induced form of ground failure that has been a major cause of earthquake damage in Southern California. Liquefaction takes place when granular materials become saturated by water, lose strength and transform from a solid to a liquid. Liquefaction generally occurs during significant earthquake activity, and structures located on soils such as silt or sand may experience significant damage during an earthquake because of the instability of structural foundations and the moving earth. Research and historical data indicate that loose granular materials situated at depths of less than 50 feet with silt and clay contents of less than 30% that are saturated by a relatively shallow groundwater table are most susceptible to liquefaction. These geological and groundwater conditions exist in parts of Southern California, typically in valley regions and alluviated floodplains.

Liquefaction has the potential to impact properties that are located along the Santa Ana River within the City and in western portions of the City. According to Figure S-3, Seismic and Geologic Hazards, of the City's General Plan Safety Element (City of Anaheim 2020a), the Project Site is located within an area susceptible to liquefaction.

Soil Exploration Company, Inc. performed a site-specific geotechnical study (Appendix D) to understand any development constraints because of the characteristics of the underlying soils. To mitigate for potential impacts related ground failure, including liquefaction, MM-GEO-1 shall be

required. MM-GEO-1 requires that the Proposed Project incorporate all applicable geotechnical recommendations made in the site-specific geotechnical study, including those related to seismic guidelines and liquefaction, into the Proposed Project's design and engineering. Application of these recommendations, including the recommendation to over excavate and recompact the existing surficial soils to provide adequate and uniform support for the Proposed Project, would further reduce the potential to expose people or structures to substantial risk of loss or injury due to liquefaction. Therefore, impacts associated with liquefaction would be less than significant with mitigation incorporated.

MM-GEO-1: The property owner/developer shall implement all recommendations in the approved Geotechnical Investigation report for the Proposed Project during site preparation, grading, and construction, and compliance with the approved Geotechnical Investigation shall be verified in the field by a qualified representative. The property owner/developer shall demonstrate to the City of Anaheim's Planning & Building Department and/or Public Works Department staff that all or equivalent recommendations in the *Preliminary Soil Investigation, Liquefaction Evaluation and Infiltration Test Report. Proposed Two-Story Apartment Complex with Partial Subterranean Parking, 3175 W. Ball Road, City of Anaheim, California*, prepared by Soil Exploration Company, Inc. September 12, 2016, or any updates to that report have been incorporated into the Proposed Project's design and grading plans.

iv) Landslides?

No Impact. The Project Site, and land within the surrounding area, is relatively flat and lacks any hillsides or other natural topographic features typically susceptible to landslides. According to Figure S-3, Seismic and Geologic Hazards, of the City's General Plan Safety Element (City of Anaheim 2020a), the Project Site is located outside of an area susceptible to earthquake-induced landslides. Therefore, no impacts associated with landslides would occur.

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

Short-Term Construction Impacts

Less-than-Significant Impact. The Proposed Project would involve earthwork and other construction activities that would disturb surface soils and temporarily leave exposed soil on the ground's surface. Common causes of soil erosion from construction sites include stormwater, wind, and soil that vehicles would track off site. To help curb erosion, Proposed Project construction activities must comply with all applicable federal, state, and local regulations for erosion control. The Proposed Project would be required to comply with standard regulations, including SCAQMD Rules 402 and 403, which would reduce construction erosion impacts. Rule 402 requires the Project Applicant to implement dust suppression techniques to prevent dust and soil erosion from creating a nuisance off site (SCAQMD 1976). Rule 403 requires the applicant to control fugitive dust with best available control measures so that it does not remain visible in the atmosphere beyond the property line of the emissions source (SCAQMD 2005).

In addition, the Proposed Project would be required to comply with Chapter 17.04, Grading, Excavations, Fills, Watercourses, of the Anaheim Municipal Code (City of Anaheim 2020b), which sets forth a series of requirements intended to minimize erosion impacts during construction activities to the extent feasible. These requirements include measures to be implemented on and adjacent to a construction site to control runoff. Consistency with RWCQB's National Pollutant Discharge Elimination System (NPDES) requirements would prevent accelerated erosion that has led to, or could lead to, degradation of water quality, damage to property, loss of topsoil and vegetation cover, disruption of water supply, and/or the deposition of sediments and associated nutrients. Therefore, short-term impacts associated with soil erosion and topsoil loss would be less than significant.

Long-Term Operational Impacts

Less-than-Significant Impact. Construction of the 11-unit apartment complex would improve the Project Site, including associated on-site and site-adjacent improvements such as parking, and pedestrian walkways and landscape areas. Collectively, these on-site areas would reduce the potential for soil erosion and topsoil loss. The structural and paved improvements would generally be impervious areas lacking any exposed soils. The landscape areas, although pervious, would contain ornamental vegetation that would help stabilize and retain surface soils on the Project Site. Therefore, long-term operational impacts associated with soil erosion and topsoil loss would be less than significant.

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

Less-than-Significant Impact with Mitigation Incorporated. Soil Exploration Company, Inc. performed a site-specific geotechnical study (Appendix D) to understand the specific development constraints because of the characteristics of the underlying soils. To mitigate for potential impacts related unstable geologic units or soils, MM-GEO-1 shall be required. MM-GEO-1 requires that the Proposed Project incorporate all applicable geotechnical recommendations made in the study, including the recommendation to over excavate and recompact the existing surficial soils to provide adequate and uniform support for the Proposed Project, into the design and engineering of the Proposed Project. Application of these recommendations would further reduce the potential to expose people or structures to substantial risk of loss or injury due to unstable geologic units or soils. Therefore, with implementation of MM-GEO-1 impacts associated with unstable geologic units or soils would be less than significant.

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

Less-than-Significant Impact with Mitigation Incorporated. According to the City's General Plan EIR, expansive soils those possessing g clay particles that react to moisture changes by shrinking (when they dry) or swelling (when they become wet). Expansive soils can also consist of silty to sandy clay. The extent of shrinking and swelling is influenced by the environment, such as alternating wet and dry cycles, and by the amount of clay in the soil. This physical change in the soils can react unfavorably with building foundations, concrete walkways, swimming pools, roadways, and masonry walls, etc.

The Proposed Project's site-specific geotechnical study (Appendix D) included an analysis of on-site soils. According to the geotechnical study, the expansion potential of near-surface soils at the Project Site is very low. Notwithstanding, to ensure all potential impacts relating to on-site soils are adequately addressed, MM-GEO-1 shall be required. MM-GEO-1 requires that the Proposed Project incorporate all applicable geotechnical recommendations made in the site-specific geotechnical study, including those related to expansive soils, into the design and engineering of the Proposed Project. Application of these recommendations would further reduce the potential to expose people or structures to substantial risk of loss or injury due to expansive soils. Therefore, with implementation of MM-GEO-1, impacts associated with expansive soils would be less than significant.

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

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

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

Less-than-Significant Impact. According to the City's General Plan EIR (City of Anaheim 2004), because most of the City is built-out, there are very few areas containing rock croppings that could potentially contain significant paleontological resources such as fossils. The Hill and Canyon Area of the City contain sedimentary rocks ranging in age from Late Cretaceous to Middle Miocene. The oldest sedimentary rocks belong to the upper Cretaceous Holz Shale and the Schulz Ranch Member of the Williams Formation. These strata are confined to the southeastern corner of the Hill and Canyon Area, and no fossils have been reported. Conversely, the Project area is not identified in the City's General Plan EIR as containing any rock croppings, being underlain by important sedimentary formations, or having sensitivity for paleontological resources, and the Hill and Canyon Area is 4 miles or more to the east of the Project Site. Moreover, as discussed previously in Section 3.5, Cultural Resources, the Project Site has been subject to extensive ground disturbance, including the removal of approximately 3,000 tons of soil. For these reasons, the Proposed Project would not directly, or indirectly, destroy a unique paleontological resource, and impacts would be less than significant.

3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Less-than-Significant Impact. Climate change refers to any significant change in measures of climate, such as temperature, precipitation, or wind patterns, lasting for an extended period (decades or longer). The Earth's temperature depends on the balance between energy entering and leaving the planet's system, and many factors (natural and human) can cause changes in Earth's energy balance. The greenhouse effect is the trapping and build-up of heat in the atmosphere (troposphere) near the Earth's surface. The greenhouse effect is a natural process that contributes to regulating the Earth's temperature, and it creates a livable environment on Earth. Human activities that emit additional GHGs to the atmosphere increase the amount of infrared radiation that gets absorbed before escaping into space, thus enhancing the greenhouse effect and causing the Earth's surface temperature to rise. Global climate change is a cumulative impact; a project contributes to this impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. Thus, CAPCOA recognizes GHG impacts exclusively as cumulative impacts (CAPCOA 2008).

A GHG is any gas that absorbs infrared radiation in the atmosphere; in other words, GHGs trap heat in the atmosphere. As defined in California Health and Safety Code Section 38505(g) for purposes of administering many of the state's primary GHG emissions reduction programs, GHGs include CO₂, methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride (see also 14 CCR 15364.5). The three GHGs evaluated herein are CO₂, CH₄, and N₂O, because these are the only GHG gases that the Proposed Project would be emit during project construction and/or operations.

Gases in the atmosphere can contribute to climate change both directly and indirectly.⁹ The Intergovernmental Panel on Climate Change developed the global warming potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The reference gas used is CO₂; therefore, this analysis measures the GWP-weighted emissions in metric tons (MT) of carbon dioxide equivalent (CO₂e). Consistent with CalEEMod Version 2016.3.2, this GHG emissions analysis assumed the GWP for CH₄ is 25 (emissions of 1 MT of CH₄ are equivalent to emissions of 25 MT of CO₂), and the GWP for N₂O is 298, based on the Intergovernmental Panel on Climate Change's Fourth Assessment Report (IPCC 2007).

⁹ Direct effects occur when the gas itself absorbs radiation. Indirect radiative forcing occurs when chemical transformations of the substance produce other GHGs, when a gas influences the atmospheric lifetimes of other gases, and/or when a gas affects atmospheric processes that alter the radiative balance of the Earth (e.g., affect cloud formation or albedo).

As discussed in Section 3.3 of this IS/MND, the Project is located within the SCAQMD's jurisdictional boundaries. In October 2008, the SCAQMD proposed recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of residential and commercial development projects as presented in its Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold (SCAQMD 2008). This document, which builds on the previous guidance prepared by the California Air Pollution Control Officers Association, explored various approaches for establishing a significance threshold for GHG emissions. The SCAQMD Governing Board did not adopt or approve the draft interim CEQA thresholds guidance document. However, in December 2008, the SCAQMD Governing Board adopted an interim 10,000 MT CO₂e per-year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency (see SCAQMD Resolution No. 08-35, December 5, 2008).

The SCAQMD formed a GHG CEQA Significance Threshold Working Group to work with SCAQMD staff on developing GHG CEQA significance thresholds until statewide significance thresholds or guidelines are established. From December 2008 to September 2010, the SCAQMD hosted working group meetings and revised the draft threshold proposal several times, although it did not officially provide these proposals in a subsequent document. The SCAQMD has continued to consider adoption of significance thresholds for residential and general land use development projects. The most recent proposal, issued in September 2010, uses the following tiered approach to evaluate potential GHG impacts from various uses (SCAQMD 2010):

- Tier 1.** Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.
- Tier 2.** Consider whether or not the proposed project is consistent with a locally adopted GHG reduction plan that has gone through public hearing and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.
- Tier 3.** Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 MT CO₂e per-year threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 MT CO₂e per year), commercial projects (1,400 MT CO₂e per year), and mixed-use projects (3,000 MT CO₂e per year). Under option 2, a single numerical screening threshold of 3,000 MT CO₂e per year would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.
- Tier 4.** Consider whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of AB 32 to reduce statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 MT CO₂e per-service population for project-level analyses and 6.6 MT CO₂e per-service population for plan-level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.
- Tier 5.** Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

CEQA Guidelines Section 15064.7(c) specifies that “[w]hen adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public

agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence.” The CEQA Guidelines do not prescribe specific methodologies for performing an assessment, establish specific thresholds of significance, or mandate specific mitigation measures. Rather, the CEQA Guidelines emphasize the lead agency’s discretion to determine the appropriate methodologies and thresholds of significance that are consistent with the manner in which other impact areas are handled in CEQA (CNRA 2009).

To determine the Project’s potential to generate GHG emissions that would have a significant impact on the environment, the Project’s GHG emissions were compared to the residential land use project quantitative threshold of 3,500 MT CO₂e per year. Per the SCAQMD guidance, the analysis should amortize construction emissions over the operational life of the project, which the SCAQMD guidance assumes to be 30 years (SCAQMD 2008). This impact analysis, therefore, compares amortized construction emissions to the proposed SCAQMD threshold of 3,500 MT CO₂e per year.

Construction Emissions

Construction of the Project would result in GHG emissions primarily associated with the use of off-road construction equipment, on-road trucks, and worker vehicles. The expected construction schedules (including information regarding phasing, equipment used during each phase, truck trips, and worker vehicle trips) assumed for the purposes of emissions estimation is provided in Table 3 and in Appendix A. On-site sources of GHG emissions include off-road equipment; off-site sources include trucks and worker vehicles. Table 14 presents construction GHG emissions for the Project from on-site and off-site emissions sources.

Table 14. Estimated Annual Construction Greenhouse Gas Emissions

	CO ₂	CH ₄	N ₂ O	CO ₂ e
Year	<i>Metric Tons per Year</i>			
2021	65.71	0.02	0.00	66.16
Amortized Construction Emissions				2.21

Source: See Appendix A for complete results.

Notes: CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; CO₂e = carbon dioxide equivalent.

As shown in Table 14, the estimated total GHG emissions in 2021 would be approximately 66 MT CO₂e. Amortized over 30 years, construction GHG emissions would be approximately 2 MT CO₂e per year. In addition, as with Project-generated construction criteria air pollutant emissions, GHG emissions generated during proposed construction activities would be short-term, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions.

Because there is no separate GHG threshold for construction, the evaluation of significance is part of the operational emissions analysis in the following text.

Operational Emissions

Once construction is complete, operation of the Project would generate GHG emissions through motor vehicle trips; landscape maintenance equipment operation (area source); energy use (natural gas and electricity); solid

waste disposal; and water supply, treatment, and distribution and wastewater treatment. This analysis used CalEEMod to calculate the annual GHG emissions based on the same operational assumptions.

The estimated operational Project-generated GHG emissions from area sources, energy usage, motor vehicles, solid waste generation, and water supply and wastewater generation are shown in Table 15.

Table 15. Estimated Annual Operational GHG Emissions

Source	CO ₂	CH ₄	N ₂ O	CO ₂ e
	<i>Metric Tons per Year</i>			
Area	3.60	<0.01	<0.01	3.71
Energy	59.08	<0.01	<0.01	59.24
Mobile	102.21	<0.01	0.00	102.33
Solid Waste	0.26	0.02	0.00	0.64
Water Supply and Wastewater Generation	5.91	0.02	<0.01	6.52
Total	171.06	0.04	<0.01	172.44
<i>Amortized Construction Emissions</i>				<i>2.21</i>
Total Net Operational + Amortized Construction GHGs				174.65

Notes: GHG = greenhouse gas; CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; CO₂e = carbon dioxide equivalent. Values of "<0.01" indicate that the estimated emissions are less than two decimals.

Source: See Appendix B for complete results.

As shown in Table 15, estimated annual Project-generated GHG emissions would be approximately 172 MT CO₂e per year because of Project operations only. After accounting for amortized Project construction emissions, total GHGs generated by the Project would be approximately 175 MT CO₂e per year. As such, annual operational GHG emissions with amortized construction emissions would not exceed the SCAQMD threshold of 3,500 MT CO₂e per year. Therefore, the Project's GHG contribution would be less than significant.

b) *Would the project generate conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Less-than-Significant Impact. The City adopted a GHG Reduction Plan in 2015; the Anaheim Public Utilities Department developed the plan to identify goals for 2020 and 2030 and to reduce community and municipal GHG emissions as mandated under AB 32. As discussed in Section 3.6(b), the Project would be consistent with the intent of the GHG Reduction Plan due to the Project following applicable energy standards and regulations during construction and operations. Therefore, the Project would meet the energy use reduction targets provided in the GHG Reduction Plan.

Consistency with CARB's Scoping Plan

The CARB Scoping Plan, approved by CARB in 2008 and updated in 2014 and 2017, provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. The Scoping Plan is not directly applicable to specific projects, nor does

CARB intend it to be used for project-level evaluations.¹⁰ Under the Scoping Plan, however, there are several state regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage, high-GWP GHGs in consumer products) and changes to the vehicle fleet (i.e., hybrid, electric, and more fuel-efficient vehicles) and associated fuels (e.g., Low Carbon Fuel Standard), among others.

Consistency with the Southern California Association of Governments 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy

SCAG's Connect SoCal (also known as the 2020–2045 RTP/SCS) is a long-range visioning plan that balances future mobility and housing needs with economic, environmental and public health goals. Connect SoCal charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians. Connect SoCal embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura. Successful implementation of the Connect SoCal would result in increasing transportation choices, reducing dependence on personal automobiles, encouraging growth in walkable/mixed-use communities with ready access to transit infrastructure and employment opportunities, and improving air quality. The Connect SoCal plan builds up the strategies identified in the 2016 RTP/SCS including land use strategies with the committed and projected transportation investments such that they emphasize system preservation and enhancement, active transportation, and land use integration. These strategies identify how the SCAG region can implement Connect SoCal and achieve related GHG reductions. The Project would develop the Project Site with 11 residential units and would not conflict with the goals of the Connect SoCal. Utilizing SCAG's Connect SoCal growth forecasts, the addition of 39 persons in 2022 would not exceed the growth assumptions in the Connect SoCal, as this would represent a nominal amount (2.2%) of the estimated annual growth within the City (SCAG 2020). Because the Connect SoCal was developed by working with local jurisdictions and utilizing the most up-to-date planning assumptions, the Project would be consistent with the Connect SoCal as well.

Consistency with Executive Order S-3-05 and Senate Bill 32

The Project would not impede the attainment of the GHG reduction goals for 2030 or 2050 identified in Executive Order (EO) S-3-05 and SB 32. EO S-3-05 establishes the following goals: California should reduce GHG emissions to 2000 levels by 2010, to 1990 levels by 2020, and to 80% below 1990 levels by 2050. SB 32 establishes a statewide GHG emissions reduction target whereby CARB, in adopting rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions, shall ensure that cumulatively statewide actions would reduce GHG emissions to at least 40% below 1990 levels by December 31, 2030. While there are no established protocols or thresholds of significance for that future

¹⁰ The Final Statement of Reasons for the amendments to the CEQA Guidelines reiterates the statement in the Initial Statement of Reasons that "[t]he Scoping Plan may not be appropriate for use in determining the significance of individual projects because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan" (CNRA 2009).

year analysis, CARB forecasts that compliance with the current Scoping Plan puts the state on a trajectory of meeting these long-term GHG goals, although the specific path to compliance is unknown (CARB 2014).

CARB has expressed optimism with regard to both the 2030 and 2050 goals. It states in the First Update to the Climate Change Scoping Plan that “California is on track to meet the near-term 2020 GHG emissions limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32” (CARB 2014). With regard to the 2050 target for reducing GHG emissions to 80% below 1990 levels, the First Update to the Climate Change Scoping Plan states that the level of reduction is achievable in California (CARB 2014). CARB believes that the state is on a trajectory to meet the 2030 and 2050 GHG reduction targets set forth in AB 32, SB 32, and EO S-3-05. The 2017 Scoping Plan (CARB 2017b) states:

The Scoping Plan builds upon the successful framework established by the Initial Scoping Plan and First Update, while identifying new, technologically feasible and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health, including in disadvantaged communities.

The Project would not interfere with implementation of any of the previously described GHG reduction goals for 2030 or 2050 because the Project would not exceed the SCAQMD’s recommended threshold of 3,500 MT CO₂e per year (SCAQMD 2008). Because the Project would not exceed the threshold, this analysis provides support for the conclusion that the Project would not impede the state’s trajectory toward the previously described statewide GHG reduction goals for 2030 or 2050.

The Project’s consistency with the state’s Scoping Plan would assist in meeting the City’s contribution to GHG emission reduction targets in California. With respect to future GHG targets under SB 32 and EO S-3-05, CARB has also made clear its legal interpretation that it has the requisite authority to adopt whatever regulations are necessary, beyond the AB 32 horizon year of 2020, to meet the SB 32 40% reduction target by 2030 and the EO S-3-05 80% reduction target by 2050. This legal interpretation by an expert agency provides evidence that California will adopt future regulations to continue the trajectory toward meeting these future GHG targets.

Based on the considerations previously outlined, the Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. This impact would be less than significant.

3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
IX. 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The following analysis is based on the Soil Vapor Investigation Report (Appendix E) prepared by Dudek in October 2017. The Soil Vapor Investigation Report (Appendix E) includes a human health risk assessment that uses the Department of Toxic Substances Control Screening Level Risk model to evaluate the carcinogenic and non-carcinogenic risk to future site occupants of the Project Site using maximum detected soil vapor concentrations from soil vapor samples taken from the Project Site by Jones Environmental on July 18, 2017. In the context of the human health risk assessment, a significant impact would occur if carcinogenic and non-carcinogenic health hazard indices exceed human health *de minimus* risk thresholds, which are one in a million for carcinogenic risks or 1.0 for the non-carcinogenic health hazard index. Additional detail is provided in Appendix E.

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

Short-Term Construction Impacts

Less-than-Significant Impact with Mitigation Incorporated. During construction of the Proposed Project, the Project Applicant and/or his/her contractor would likely handle potentially hazardous materials on the Project Site. These materials would include gasoline, diesel fuel, lubricants, and other petroleum-based products used to operate and maintain construction equipment. Handling these potentially hazardous materials would be temporary and would coincide with the short-term construction phase of the Proposed Project. Although these materials would likely be stored on the Project Site, storage would be required to comply with the guidelines set forth by each product's manufacturer, as well as in accordance with all applicable federal, state, and local regulations pertaining to the storage of hazardous materials. For the transport of hazardous materials, a hired licensed contractor would transport hazardous materials on and off the Project Site. The licensed contractor is required to follow procedures set forth by federal, state, and local requirements, pertaining to the transport of hazardous materials on and off the Project Site. Further, any handling, transport, use, or disposal of hazardous materials would comply with all relevant federal, state, and local agencies and regulations, including the EPA, California Department of Toxic Substances Control, California Occupational Safety and Health Administration, California Department of Transportation, Resource Conservation and Recovery Act, and the City of Anaheim's Certified Unified Program Agency.

In 1963, construction of an E-Z Serve gasoline station occurred on the Project Site and then in May 1988, the demolition of the E-Z Serve gasoline station took place, leaving the Project Site vacant. At the time of the demolition of the E-Z Serve gasoline station, Caliber Contractors, working on behalf of the property owner at the time, removed three 10,000-gallon underground gasoline USTs, one 550-gallon waste oil UST, and associated appurtenances from the Project Site. Upon removal, Caliber Contractors found the USTs to have leaked petroleum hydrocarbons into the soil and groundwater. Over the course of a decade, hazardous materials specialists under contract with property owner at the time and under the oversight of the SARWQCB performed site characterization efforts to identify the extent of contamination and identify safe procedures by which remediation activities could occur. Subsequently, hazardous materials specialists under contract with property owner at the time performed site remediation activities. Site characterization and remediation efforts included soil borings, hydropunch sampling, installation and sampling of groundwater monitoring wells, and a brief dual-phase vapor extraction/air sparge pilot test. Remediation activities ultimately involved excavation and removal of over 3,000-tons of petroleum-contaminated soil and groundwater monitoring and extraction at the site. On April 9, 2012, the SARWQCB issued a closure letter stating that remediation activities had remediated contaminants to acceptable levels for commercial and industrial use, but noted that if there were to be a change in land-use to a residential or more restrictive use (i.e., school, nursery, hospital, residential, or senior housing), a vapor human health risk assessment may be required (SARWQCB 2012).

Because the Proposed Project would require a land use change from commercial to residential, a soil vapor human health risk assessment was prepared (Appendix E) to evaluate on-site soils and estimate the potential human health risk to future building occupants due to vapor intrusion of gasoline-related VOCs from the subsurface.

As part of the Soil Vapor Investigation Report (Appendix E), Jones Environmental conducted soil vapor sampling on July 18, 2017. No contaminants were detected in the soil samples collected; however, soil vapor sampling indicated the presence of VOCs (mainly the gasoline constituents benzene, ethylbenzene, toluene, and xylenes) in the subsurface at the Project Site. The sampling also detected concentrations of chloroform, isopropylbenzene, and styrene that were above the laboratory reporting limits¹¹, indicating their concentrations should be analyzed in the context of their potential impacts on human health.

The Soil Vapor Investigation Report (Appendix E) includes a human health risk assessment, conducted by Dudek. The health risk assessment uses the Department of Toxic Substances Control Screening Level Risk model, with inputs from the sampling event. The model utilizes these inputs to evaluate the carcinogenic and non-carcinogenic risk to future site occupants using the maximum detected soil vapor concentrations of all detected VOCs. The model's results indicate that the modeled excess carcinogenic risk for the Project Site is "one in a million", which is equal to the *de minimus* human health risk threshold of one in a million. The calculated cumulative non-carcinogenic health hazard index at the site is 0.03, which is below the threshold value of 1.0. These carcinogenic and non-carcinogenic health hazard indices are equal to or below human health *de minimus* risk thresholds. Nevertheless, to minimize risk to construction workers who would handle subsurface soils on the Project Site and to properly manage excavated soils and any extracted groundwater, mitigation measures (MM-) HAZ-1, MM-HAZ-2, and MM-HAZ-3 would be required:

MM-HAZ-1 Prior to the issuance of Grading and Building Permits, the property owner/developer shall prepare and submit a site-specific Health and Safety Plan to the Planning and Building Department.

The site-specific Health and Safety Plan shall require that the property owner/developer include the following instructions to its construction contractor: "The construction contractor shall use a photoionization detector (PID) to regularly inspect the exposed soil for evidence of any contamination." These instructions shall be included on all plans pertaining to subsurface construction activities for the Proposed Project. The site-specific Health and Safety Plan shall identify air monitoring action levels based on the benzene Cal-OSHA permissible exposure limit (PEL) to protect worker health and safety. The site-specific Health and Safety Plan shall note measures to be taken if air monitoring in the breathing zone of site workers indicates concentrations above the action levels. These measures could include the use of personal protective equipment, including air purifying respirators, or engineering controls, as well as site perimeter monitoring.

MM-HAZ-2 Prior to issuance of Grading or Building Permits, the property owner/developer shall submit to the Planning and Building Department notes on plans that indicate that if potential contamination indicators are identified during excavation based on visual observations and/or air monitoring the soil will be segregated and evaluated. Soil impacted by petroleum hydrocarbons may be stained or odorous. Stained soil may have bluish to dark gray discoloration. Discoloration may remain even after the product has naturally degraded. If suspect petroleum hydrocarbon-impacted soils are observed during excavation, the soil will be segregated and evaluated. Evaluation will include collection of samples for total petroleum hydrocarbons (TPH) and volatile organic compound (VOC) analysis. The number of samples to be collected will be based on potential disposal facility requirements. If

¹¹ The smallest concentration (or amount) of analyte, that can be reported by a laboratory is called the laboratory reporting limit.

concentrations of TPH and VOCs are below direct exposure human health soil screening levels (Regional Water Quality Control Board Environmental Screening Levels), then the soil may remain on-site. If the concentrations exceed the screening levels, then the soil will be removed from the Project Site and properly disposed of off-site in accordance with local, State, and Federal regulations.

Visually screening the soil will be accompanied by air monitoring using a photoionization detector (PID) or other organic vapor analyzer. In accordance with South Coast Air Quality Management District (SCAQMD) regulations (specifically Rule 1166), VOC-contaminated soil, if identified at the Project Site during excavation activities, will be properly managed. VOC-contaminated soil, as defined in Rule 1166, consists of soil with concentrations of 50 parts per million or greater when measured within 3 inches of the soil using a PID calibrated with hexane. If volatile organics are measured at concentrations of 50 parts per million or greater when measured within 3 inches of the soil using a PID calibrated with hexane, then the excavation, stockpile management, and agency notification shall comply with SCAQMD Rule 1166. If identified, VOC-contaminated soil, as defined in Rule 1166, shall be removed from the Project Site and properly disposed of off-site in accordance with local, State, and Federal regulations.

MM-HAZ-3

Prior to issuance of Grading or Building Permits, the property owner/developer shall submit to the Planning and Building Department notes on plans that indicate that during construction, should groundwater be encountered and require extraction, any extracted groundwater will be managed in accordance with the National Pollutant Discharge Elimination System (NPDES) permit for construction dewatering, in accordance with existing regulations. The NPDES permit will require monitoring of volatile organic compound concentrations in the extracted groundwater per the Monitoring and Reporting Program developed at the time of issuance of a NPDES permit. Prior to the issuance of Building Permits, the property owner/developer shall submit to the Planning and Building Department a memorandum or report indicating whether construction dewatering was requiring during site preparation and grading. If construction dewatering is necessary, the Monitoring and Reporting Program and memorandum or report shall identify whether effluent concentrations at the end of dewatering increased compared to the initial concentrations. The Monitoring and Reporting Program and memorandum or report shall be submitted to the Planning and Building Department.

If the effluent concentrations at the end of dewatering increased compared to the initial concentrations, the Planning and Building Department shall require that the property owner/developer retain a qualified environmental professional to reevaluate the potential human health risk under the residential scenario based on the effluent VOC concentrations at the end of dewatering. If the qualified environmental consultant determines that the potential human health risk under the residential scenario exceeds *de minimis* thresholds of one in a million for cancer risk or the non-cancer hazard index risk value of 1.0, the property owner/developer shall be responsible for informing the Planning and Building Department and Santa Ana Regional Water Quality Control Board in writing of the discovery. The property owner/developer shall be responsible for coordinating with the qualified environmental consultant to ensure that the vapor mitigation noted in Mitigation

Measure (MM-) HAZ-4 is designed to sufficiently mitigate vapor impacts to human health and safety of future occupants at the Project Site.

With the incorporation of mitigation, short-term impacts associated with the use, transport, and disposal of hazardous materials would be less than significant.

Long-Term Operational Impacts

Less-than-Significant Impact with Mitigation Incorporated. As a residential land use, potentially hazardous materials associated with operation of the Proposed Project would include those materials typically associated with cleaning and maintenance activities. Although these materials would vary, they would generally include household cleaning products, solvents, paints, fertilizers, and herbicides and pesticides. The EPA considers many of these materials as household hazardous wastes, common wastes, and universal wastes. The EPA also considers these types of wastes common to businesses and households and to pose a lower risk to people and the environment than other hazardous wastes when properly handled, transported, used, and disposed of (EPA 2020). Because of less-stringent standards than other hazardous wastes, many of these wastes do not need the same special handling as hazardous wastes typically would under federal, state, and local regulations. The regulations typically allow unlicensed individuals to handle and dispose of these types of wastes.

Additionally, any potentially hazardous material handled on the Project Site would be limited in quantity and concentration, consistent with other similar residential uses located in the City, and any handling, transport, use, and disposal of such material would comply with applicable federal, state, and local agencies and regulations. Furthermore, as mandated by the Occupational Safety and Health Administration, required postings of Materials Safety Data Sheets, accompanying all hazardous materials stored on the Project Site, would inform on-site personnel and residents of the necessary remediation procedures in the case of accidental release (OSHA 2020). Therefore, long-term impacts associated with the release of hazardous materials into the environment would be less than significant.

Although it was determined in the Soil Vapor Investigation Report (Appendix E) that the presence of VOCs on the Project Site did not exceed the *de minimis* risk level, as the risk level was equal to the *de minimis* level, the Soil Vapor Investigation Report (Appendix E) recommended vapor intrusion measures. These measures would minimize risk to future residents of the Proposed Project, as outlined in MM-HAZ-4:

MM-HAZ-4 Prior to the issuance of Grading and Building Permits, the property owner/developer shall submit plans to the Planning and Building Department, showing that the property owner/developer has incorporated at least one of following options into the Proposed Project:

- Option A: Limiting vapor intrusion into future residences through use of a well-ventilated ground-level garage that is not intended for human occupation; or
- Option B: Installation of a sub-slab liner/passive ventilation to limit vapor intrusion to the future residences.

With the incorporation of MM-HAZ-4, long-term impacts associated with the use, transport, and disposal of hazardous materials would be less than significant. (Note that based on the current site plan [see Figure 6a], the Proposed Project's design already incorporates a well-ventilated ground-level garage that is not

intended for human occupation, and thus, barring any significant redesign that removes this ground-level garage component of the Proposed Project, this mitigation measure has been satisfied through a Project design feature).

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

Short-Term Construction Impacts

Less-than-Significant Impact with Mitigation Incorporated. As discussed in Section 3.9(a), Dudek prepared a Soil Vapor Investigation Report (Appendix E) to determine if the health risks involved with soil vapor at the Project Site would affect future occupants of the Proposed Project. Results of the Soil Vapor Investigation Report indicated that carcinogenic and non-carcinogenic risks at the Project Site are below equal to or human health *de minimis* risk thresholds.

To minimize risk to construction workers who would handle subsurface soils MM-HAZ-1, MM-HAZ-2, and MM-HAZ-3 would be required. With the incorporation of mitigation, short-term impacts associated with the use, transport, and disposal of hazardous materials would be less than significant.

Long-Term Operational Impacts

Less-than-Significant Impact with Mitigation Incorporated. As a residential land use, potentially hazardous materials associated with operation of the Proposed Project would include those materials typically associated with cleaning and maintenance activities. Although these materials would vary, they would generally include household cleaning products, solvents, paints, fertilizers, and herbicides and pesticides. The EPA considers many of these materials to be household hazardous wastes, common wastes, and universal wastes. The EPA considers these types of wastes common to businesses and households and to pose a lower risk to people and the environment than other hazardous wastes when individuals properly handle, transport, use, and dispose of them (EPA 2020). Federal, state, and local regulations typically allow individuals to handle and dispose of these types of wastes under less-stringent standards than other hazardous wastes, and many of these wastes do not need management as hazardous waste.

Additionally, any potentially hazardous material handled on the Project Site would be limited in quantity and concentration, consistent with other similar residential uses located in the City, and any handling, transport, use, and disposal of such material would comply with applicable federal, state, and local agencies and regulations. Additionally, as mandated by the Occupational Safety and Health Administration, a Materials Safety Data Sheet would accompany all hazardous materials stored on the Project Site. The Materials Safety Data Sheet would inform on-site personnel and residents of the necessary remediation procedures in the case of accidental release (OSHA 2020). Therefore, long-term impacts associated with the use, transport, and disposal of hazardous materials would be less than significant.

Although the Soil Vapor Investigation Report (Appendix E) determined that the presence of VOCs on the Project Site did not exceed the *de minimis* risk level, as the risk level was equal to the *de minimis* level, the report recommended vapor intrusion measures to minimize risk to future residents of the Proposed Project, as outlined in MM-HAZ-4. With the incorporation of mitigation, long-term impacts associated with the use, transport, and disposal of hazardous materials would be less than significant.

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

Less-than-Significant Impact. Land uses and activities typically associated with hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste include heavy commercial, manufacturing, research, and industrial uses. The Proposed Project does not include any such uses or activities.

In addition, as a residential land use, potentially hazardous materials associated with operation of the Proposed Project would include those materials typically associated with cleaning and maintenance activities, including household hazardous wastes, common wastes, and universal wastes. The EPA considers these materials to be common to businesses and households and to pose a lower risk to people and the environment than other hazardous wastes when individuals properly handle, transport, use and dispose of them (EPA 2020). Further, any potentially hazardous material handled on the Project Site would be limited in quantity and concentration, consistent with other similar residential uses located in the City, and any handling, transport, use, and disposal of such material would comply with applicable federal, state, and local agencies and regulations.

As such, even though the closest school to the Project Site (Twila Reid Elementary School) is 0.22 miles north of the Project Site, the Proposed Project would not emit hazardous emissions or include handling of hazardous or acutely hazardous materials, substances, or wastes. Therefore, impacts associated with the emitting or handling of hazardous materials within 0.25 miles of a school would be less than significant.

- d) ***Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?***

Less-than-Significant Impact. The Hazardous Waste and Substances Sites (Cortese) List is a planning document used by the state, local agencies, and developers to comply with the CEQA requirements in providing information about the locations of hazardous materials release sites. California Government Code Section 65962.5 requires the California EPA to develop, at least annually, an updated Cortese List. The Department of Toxic Substances Control is responsible for a portion of the information contained in the Cortese List. Other state and local government agencies are required to provide additional hazardous material release information for the Cortese List.

From 1963 to 1988 the Project Site was developed with an E-Z Serve gasoline station, which was found to have leaking underground storage tanks that released gasoline products into the soil. Because of this release, the State Water Resources Control Board listed the Project Site on its Leaking Underground Storage Tank List. Over the course of a decade, hazardous materials specialists under contract with property owner at the time on the Project Site under the oversight of the SARWQCB undertook efforts to remediate on-site soils, and in 2012, the State Water Resources Control Board closed the case (Appendix E). As discussed in Section 3.9(a), it was determined in the Soil Vapor Investigation Report (Appendix E) that the presence of VOCs resulting from this leaking underground storage case would not pose a threat to the Proposed Project and its residents. The Project Site is not located on any other regulatory database, such as the EnviroStor database maintained by the Department of Toxic Substances Control (DTSC 2020). As such, impacts would be less than significant.

- 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 nearest airport is Los Alamitos Joint Forces Training Base, located approximately 2.5 miles to the southwest, which is a military airfield. The closest public airport to the Project Site is Fullerton Municipal Airport, which is located approximately 5.0 miles northeast of the Project Site in the City of Fullerton. The Project Site is not part of the Airport Land Use Commission (ALUC) Airport Environs Land Use Plan for Los Alamitos Joint Forces Training Base or for Fullerton Municipal Airport (ALUC 2004, 2016). The Project Site is outside of the areas that the ALUC regulates land use with respect to air crash hazards. The Project Site is also outside of the areas where ALUC would limit the heights of structures to prevent airspace obstructions for aircraft approaching or departing an airport. The Proposed Project would not result in safety hazards related to aircraft operations. Therefore, no impacts associated with public airport hazards would occur.

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

No Impact. According to Figure C-1, Planned Roadway Network, in the City's General Plan Circulation Element (City of Anaheim 2020a), West Ball Road is identified as a Primary Arterial, and Western Avenue is identified as a Secondary Arterial. Both of these roadway facilities traverse the City and connect to regional facilities, including I-5, SR-91 and SR-39. Due to this local and regional connectivity, in the unlikely event of an emergency, both of these Project-adjacent roadway facilities would serve as emergency evacuation routes for first responders and residents. As discussed in Section 3.16, Transportation, the Proposed Project would not adversely affect operations on the local or regional circulation system, and as such, would not affect the use of these facilities as emergency response routes. Therefore, no impacts associated with an emergency response plan or emergency evacuation plan would occur.

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

No Impact. According to Figure S-5, Fire Protection Areas, of the City's General Plan Safety Element (City of Anaheim 2020a), the Project Site is located outside of a Fire Hazard Severity Zone. Existing development surrounds the Project Site and it is within an urbanized portion of the City, away from any urban/wildland interface. Therefore, no impacts associated with wildland fire hazards would occur.

3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Short-Term Construction Impacts

Less-than-Significant Impact. Project construction would include earthwork activities that could potentially result in erosion and sedimentation, which could subsequently degrade downstream receiving waters and

violate water quality standards. Stormwater runoff during the construction phase may contain silt and debris, resulting in a short-term increase in the sediment load of the municipal storm drain system. The construction of the Project may result in construction-related substances such as oils, fuels, paints, solvents, trash, and sanitary waste inadvertently spilled or released on the Project Site and subsequently conveyed via stormwater to nearby drainages, watersheds, and groundwater.

The Construction General Permit requires development and implementation of a stormwater pollution prevention plan (SWPPP). Among the mandated items included within a SWPPP are project design features intended to protect against the potential discharge of construction-related substances, as well as substantial soil erosion because of water and wind erosion, commonly known as best management practices (BMPs). Typical BMPs include maintaining or creating drainages to convey and direct surface runoff from bare areas and installing physical barriers such as berms, silt fencing, wattles, straw bales, and gabions. BMPs also include good housekeeping practices such as properly storing hazardous materials, properly managing waste/trash, and regularly inspecting equipment. The implementation of a Construction General Permit, including preparation of an SWPPP and incorporation of BMPs, would ensure that the proper measures are in place to prevent, to the extent feasible, stormwater runoff from conveying sediments, pollutants, and other constituents off site to downstream receiving waters.

In addition, the Project would be required to comply with Chapter 17.04, Grading, Excavations, Fills, Watercourses, of the Anaheim Municipal Code (City of Anaheim 2020b), which sets forth a series of requirements intended to minimize erosion impacts during construction activities to the extent feasible. These requirements include measures to be implemented on and adjacent to a construction site to control runoff, consistent with NPDES requirements imposed by SARWQCB. Implementation of these requirements would prevent accelerated erosion that has led to, or could lead to, degradation of water quality, damage to property, loss of topsoil and vegetation cover, disruption of water supply, and the deposition of sediments and associated nutrients. Therefore, short-term construction impacts associated with water quality would be less than significant.

Long-Term Operational Impacts

With respect to operation of the Proposed Project, future uses on-site that could contribute pollutants to stormwater runoff in the long term include parking areas (through small fuel and/or fluid leaks), uncovered refuse storage/management areas, landscape/open space areas (if pesticides/herbicides and fertilizers are improperly applied), and general litter/debris (e.g., generated during facility loading/unloading activities). During storm events, the first few hours of moderate to heavy rainfall could wash a majority of pollutants from the paved areas where, without proper stormwater controls and BMPs, those pollutants could enter the municipal storm drain system before eventually being discharged to adjacent waterways (in this case, Carbon Canyon Creek, Coyote Creek, San Gabriel River Reach 1, San Gabriel River Estuary, San Pedro Bay Near/Off Shore Zone, and its discharge into the Pacific Ocean). The majority of pollutants entering the storm drain system in this manner would be dust, litter, and possibly residual petroleum products (e.g., motor oil, gasoline, diesel fuel). Certain metals, along with nutrients and pesticides from landscape areas, can also be present in stormwater runoff. Between periods of rainfall, surface pollutants tend to accumulate, and runoff from the first significant storm of the year ("first flush") would likely have the largest concentration of pollutants.

Stormwater quality within the Santa Ana Region (of which the Project site is a part) is managed by the SARWQCB, which administers the *NPDES Permit and Waste Discharge Requirements for the County of Orange, Orange County Flood Control District and, and the Incorporated Cities of Orange County within the Santa Ana Region* (Municipal Separate Storm Sewer System [MS4] Permit). The MS4 Permit requires Permittees, including the City, to implement a development planning program to address stormwater pollution. These programs require project applicants for certain types of projects to implement a Water Quality Management Plan (WQMP) throughout the operational life of each projects. The purpose of a WQMP is to reduce the discharge of pollutants in stormwater and to eliminate increases in pre-existing runoff rates and volumes by outlining BMPs, which must be incorporated into the design plans of new development and redevelopment (SARWQCB 2011a).

Per the MS4 Permit, and as described in the Model Water Quality Management Plan for the Santa Ana Region of Orange County, a project-specific WQMP is required to manage the discharge of stormwater pollutants from development projects to the “maximum extent practicable” (SARWQCB 2011b). The maximum extent practicable is the standard for control of stormwater pollutants, as set forth by Section 402(p)(3)(iii) of the Clean Water Act. However, the Clean Water Act does not quantitatively define the term maximum extent practicable. As implemented, maximum extent practicable varies with conditions. In general, to achieve the maximum extent practicable standard, co-permittees must require deployment of whatever BMPs are technically feasible (that is, are likely to be effective) and are not cost prohibitive. To achieve fair and effective implementation, criteria and guidance for those controls must be detailed and specific, while also offering the right amount of flexibility or exceptions for special cases. A project-specific WQMP’s compliance with the requirement to achieve the maximum extent practicable standard is documented within the project-specific WQMP through the completion of worksheets that document the feasibility or infeasibility of the deployment of BMPs.

As a Permittee subject to the MS4 permit, the City is responsible for ensuring that all new development and redevelopment projects comply with the MS4 Permit, as required Chapter 10.09, National Pollution Discharge Elimination System, of the Anaheim Municipal Code (City of Anaheim 2020b). In accordance with the requirements of the MS4 Permit, a preliminary WQMP was prepared for the Proposed Project by CRF Engineering, Inc. in December 2019 (Appendix F). As detailed in the project-specific WQMP, the Proposed Project would incorporate the low impact development BMPs, including structural and non-structural BMPs to ensure that the Proposed Project does not degrade surface or ground water quality. The Proposed Project’s preliminary WQMP was conditionally approved by the City’s Public Works Department. In addition, the WQMP includes an Operations & Maintenance Plan to ensure BMPs are managed throughout the life of the Proposed Project. Implementation of the applicable BMPs per the WQMP would reduce storm water pollutants and water quality impacts to a less than significant level. Impacts would be less than significant.

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

Groundwater Supplies

Less-than-Significant Impact. According to the City of Anaheim’s 2015 Urban Water Management Plan (City of Anaheim 2016a), the City depends on a combination of imported water, local groundwater, and recycled water to meet its water needs. The City works with the Metropolitan Water District of Southern California (Metropolitan) and Orange County Water District (OCWD) to ensure a safe and reliable water supply that

will continue to serve the community in periods of drought and shortage. The sources of imported water supplies include the Colorado River and the State Water Project provided by Metropolitan.

The City's main source of water supply is groundwater from the Orange County Groundwater Basin (Basin). Currently, the City relies on approximately 70% groundwater and 30% imported water. The 2015 Urban Water Management Plan anticipates that the same water supply mix will be available to the City through 2040 (City of Anaheim 2016a). OCWD manages the Basin for the benefit of municipal, agricultural, and private groundwater producers and is responsible for the protection of water rights to the Santa Ana River in Orange County and the management and replenishment of the Basin.

OCWD is the groundwater manager over the Basin, and the producers are the local retailers of the groundwater supplies. OCWD prepared a Groundwater Management Plan, which it last updated in July 2015 (OCWD 2015). The Groundwater Management Plan identifies OCWD's goals and management objectives in protecting and managing the Basin. This plan describes Basin hydrogeology, water supply monitoring, management and operation of recharge facilities, groundwater replenishment system, seawater intrusion monitoring and barrier management, and water quality protection.

OCWD manages the Basin to allow utilization of up to 500,000 acre-feet of storage capacity of the Basin during dry periods, acting as an underground reservoir and buffer against drought. OCWD operates the Basin to keep the target dewatered Basin storage at 200,000 acre-feet as an appropriate accumulated overdraft. OCWD has made substantial investment in facilities, Basin management, and water rights protection, resulting in the elimination and prevention of adverse long-term overdraft conditions.

OCWD actively manages the Basin to ensure that groundwater produced within the Basin and supplied to retailers does not result in overdraft conditions or other adverse impacts to the Basin. By managing the Basin, OCWD assures the long-term sustainability of the Basin and groundwater supplies. As such, although the Project would rely on water supplies composed of groundwater, the OCWD actively manages the Basin to ensure that existing and future development does not adversely affect groundwater levels and supplies. Therefore, impacts associated with groundwater supplies would be less than significant.

Groundwater Recharge

Less-than-Significant Impact. Although the Project Site is currently undeveloped, the Project Site is composed of a single 0.36-acre parcel located in an urbanized part of the City. Additionally, the Project Site was once subject to the release of petroleum product, which has since been remediated by a previous property owner (under the oversight of the SARWQCB) to acceptable levels deemed acceptable for human occupation by the SARWQCB. Nonetheless, residual soil vapors within the acceptable risk levels for human occupation remain in on-site soils, making groundwater recharge infeasible at the Project Site, according to CRF Engineering, Inc. (see Appendix F for further detail). For these reasons, and given the Project Site's minimal size, the parcel is not an important location for groundwater recharge, and the Project would not substantially impair groundwater recharge necessary to replenish the City's water supply. Therefore, impacts associated with groundwater recharge would be less than significant.

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

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

Less-than-Significant Impact. Under existing conditions, the entirety of the ground surface is covered with soil. Thus, implementation of the project would increase the amount of impervious areas on site and alter the existing drainage patterns; however, the Project Site does not currently have infiltration basins or drainage systems in place to control stormwater runoff. Implementation of the Proposed Project would result in the development of an 11-unit apartment building that would feature an engineered drainage system to control, manage, and treat stormwater runoff prior to conveying it into the City's storm drain system. Implementation of these stormwater facilities would reduce erosion and siltation during operation. Additionally, a storm water flow rate analysis was conducted as part of the preliminary drainage report (prepared by CRF Engineers Inc. in December 2019; see Appendix G), and it determined that, with the incorporation of the proposed on-site storm water infrastructure, the Proposed Project would result in lower flow rates than existing conditions. The Proposed Project would not result in a negative impact to the City's storm drain system, because the flow leaving the Project Site would be less than existing conditions. Therefore, implementation of the Proposed Project would not result in substantial erosion or siltation on or off-site, and impacts 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 in Section 3.10(ii), a storm water flow rate analysis was conducted as part of the preliminary drainage report (prepared by CRF Engineers Inc. in December 2019; see Appendix G). The storm water flow rate analysis determined that with the incorporation of the proposed on-site storm water infrastructure, the Proposed Project would result in lower flow rates than existing conditions. The Proposed Project would not result in a negative impact to the City's storm drain system, because the flow leaving the Project Site would be less than existing conditions. Therefore, implementation of the Proposed Project would not result in substantial erosion or siltation on or off-site, and impacts 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.

Short-Term Construction Impacts

Less-than-Significant Impact. Construction activities would be subject to the NPDES stormwater program, which includes obtaining coverage under the NPDES Construction General Permit. SARWQCB administers the NPDES Permit Program, in the Project area. This permit program helps control water pollution by regulating point sources that discharge pollutants into receiving waters.

The Construction General Permit requires development and implementation of a SWPPP. The SARWQCB mandates that the SWPPP include project design features, commonly known as BMPs, intended to protect against substantial soil erosion because of water and wind erosion. The implementation of a Construction General Permit, including preparation of an SWPPP and incorporation of BMPs, would ensure that the proper measures are in place to prevent, to the extent feasible, stormwater runoff from conveying sediments and other constituents off site to downstream receiving waters.

In addition, the Project would be required to comply with Chapter 17.04, Grading, Excavations, Fills, Watercourses, of the Anaheim Municipal Code (City of Anaheim 2020b), which sets forth a series of requirements intended to minimize erosion impacts during construction activities to the extent feasible. These requirements include measures to be implemented on and adjacent to a construction site to control runoff, consistently with NPDES requirements imposed by SARWQCB. The measures prevent accelerated erosion that has led to, or could lead to, degradation of water quality, damage to property, loss of topsoil and vegetation cover, disruption of water supply, and the deposition of sediments and associated nutrients. Therefore, short-term construction impacts associated with water quality degradation would be less than significant.

Long-Term Operational Impacts

Less-than-Significant Impact. Implementation of the Proposed Project would result in the development of an 11-unit apartment building that would feature an engineered drainage system to control, manage, and treat stormwater runoff prior to conveying it into the City's storm drain system. Implementation of these stormwater facilities would reduce the amounts of pollutants exiting the Project Site during operation and would also reduce the velocities and flows of stormwater leaving the Project Site, thereby reducing the potential to exceed the capacity of stormwater systems or contribute substantial sources of polluted runoff. Therefore, long-term operational impacts associated with water quality degradation would be less than significant.

iv) *impede or redirect flood flows?*

No Impact. According to Figure S-6, Flood Hazard Areas, and Figure S-7, Dam Inundation Areas, of the City's Safety Element, the Project Site is not located within a flood hazard area or dam inundation area (City of Anaheim 2020a); therefore, no impacts associated with flooding would occur. Therefore, the placement of an 11-unit apartment building within an urbanized area would have no effect on flood flows, and no impacts would occur in this regard.

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

No Impact. Refer to Section 3.10(c)(iv). The Project Site is not near a lake that could be vulnerable to a seiche during high winds. Also, the Project Site is not within a coastal area or river delta that could be impacted by a tsunami. Finally, the topography of the site and Project area is relatively flat and would not be subject to significant impacts from mudflow. Thus, no impact would occur.

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

Less-than-Significant Impact. The Proposed Project would comply with regional and local regulations requiring preparation of a SWPPP, and would not obstruct existing water quality control plans or groundwater sustainable management plans. In addition, the Project Site is not a suitable site for groundwater recharge; and, therefore the Proposed Project would not introduce impervious areas over a significant groundwater recharge zone. Therefore, impacts associated with a conflict with a water quality control plan or sustainable groundwater management plan would be less than significant.

3.11 Land Use and Planning

	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
XI. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) **Would the project physically divide an established community?**

No Impact. The physical division of an established community typically refers to the construction of a linear feature (such as a major highway or railroad tracks) or removal of a means of access (such as a local road or bridge) that would impair mobility within an existing community or between a community and outlying area. Under the existing conditions, the Project Site does not serve as a connection between established communities. Instead, the City facilitates connectivity within the area surrounding the Project Site via local roadways and pedestrian sidewalks. Therefore, no impacts associated with physical division of an established community would occur.

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

Less-than-Significant Impact. The Proposed Project is in the City of Anaheim and therefore subject to the City's General Plan and Municipal code, which guide local development.

The Proposed Project would include a General Plan Amendment (GPA2016-00510) to change the Project Site's General Plan land use designation from General Commercial to Residential Medium, and a Zoning Reclassification (RCL2016-00297) from the "C-G" General Commercial Zone to the "RM-4" Multiple-Family Residential Zone.

While the Proposed Project would change the Project Site's existing General Plan Land Use designation and zoning, other multifamily residential uses are located in the area surrounding area. These residential developments include the three- and two-story multi-family developments along Ball Road and Western Avenue, immediately adjacent to the Project Site. These nearby properties are within the RM-4 Zone with corresponding land use designations of Residential Mid Density and Residential Medium Density, among other single-family residential and commercial land uses.

According to Section 18.06.040, Intent of Individual Zones, of the Anaheim Municipal Code (City of Anaheim 2020b), the intent of the RM-4 Zone is to provide an attractive, safe, and healthy environment with multiple-family units with a minimum building site area per dwelling unit of 1,200 square feet. This zone implements the Medium Density Residential land use designation in the General Plan.

Municipal Code Chapter 18.06, Multiple-Family Residential, sets forth various requirements pertaining to development within the RM-4 Zone, including minimum lot size, dimensions, and coverage; maximum density, height, and setbacks; and landscape coverage (City of Anaheim 2020b). The Proposed Project would comply with these development standards, with the exception of two development standards relating to landscape setbacks adjacent to an arterial highway and interior structural setbacks. However, the Proposed Project would include the processing and approval of an Administrative Adjustment (ADJ2020-00444), pursuant to the provisions of Section 18.62.040 of the Anaheim Municipal Code, which allows the Planning Director or Planning Commission (if the Planning Director refers an administrative adjustment to the Planning Commission) to grant waivers of certain development standards. With approval of the proposed Administrative Adjustment (ADJ2020-00444), and with compliance with the remaining development standards, the Proposed Project would be constructed consistently with the intent and purpose of the RM-4 Zone, ensuring that the Proposed Project is consistent with its General Plan land use designation, and would also provide an attractive, safe, and healthy setting for residents.

The City of Anaheim will thoroughly review all plans for the Proposed Project to ensure compliance with all applicable development standards set forth in the Anaheim Municipal Code and other relevant land use plans, policies, and regulations. Therefore, impacts associated with applicable land use plans, policies, and regulations would be less than significant.

3.12 Mineral Resources

	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
XII. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

No Impact. The Green Element of the Anaheim General Plan identifies regionally significant mineral resources in parts of East Anaheim, Anaheim Canyon, and the Hill and Canyon Areas. These resources primarily consist of aggregate, sand, and gravel (City of Anaheim 2020a). These parts of the City are four miles or more east of the Project Site. Figure G-3, Mineral Resources Map, of the General Plan Green Element (City of Anaheim 2020a) shows the location of regionally significant aggregate resource areas and mineral resource zones. The Project Site is not within any of these mineral resource areas. The Project Site is in a developed part of the City; no mineral extraction activities occur on or adjacent to the Project Site; and no known mineral resources are present on site. Therefore, no impacts associated with the loss of known mineral resources would occur.

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

No Impact. As discussed previously, no regionally significant aggregate resource areas or mineral resource zones are located on or adjacent to the Project Site. Additionally, no mineral extraction activities occur on or adjacent to the Project Site. Therefore, no impacts associated with the loss of availability of a locally important mineral resource recovery site would occur.

3.13 Noise

	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
XIII. 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Noise is an unwanted sound, that is loud or unpleasant or a cause of disturbance. Sound may be described in terms of level or amplitude (measured in decibels), frequency or pitch (measured in hertz or cycles per second), and duration (measured in seconds or minutes). The standard unit of measurement of the amplitude of sound is the decibel (dB). Because the human ear is not equally sensitive to sound at all frequencies, a special frequency-dependent rating scale, the A-weighted decibel scale (dBA), relates noise to human sensitivity. The dBA performs this compensation by discriminating against low and very high frequencies in a manner approximating the sensitivity of the human ear. Several descriptors of noise (noise metrics) exist to help predict average community reactions to the adverse effects of environmental noise, including traffic-generated noise, on a community. These descriptors include the equivalent noise level over a given period (L_{eq}), the statistical sound level, the day-night average noise level (L_{dn}), and the community noise equivalent level (CNEL). Each of these descriptors uses units of dBA. Table 16 provides examples of A-weighted noise levels from common sounds. In general, human sound perception is such that a change in sound level of 3 dB is barely noticeable and a change of 5 dB is clearly noticeable. Humans perceive a change of 10 dB as doubling or halving of the sound level.

Table 16. Typical Sound Levels in the Environment and Industry

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
—	110	Rock band
Jet flyover at 300 meters (1,000 feet)	100	—
Gas lawn mower at 1 meter (3 feet)	90	—
Diesel truck at 15 meters (50 feet), at 80 kilometers per hour (50 mph)	80	Food blender at 1 meter (3 feet) Garbage disposal at 1 meter (3 feet)
Noisy urban area, daytime gas lawn mower at 30 meters (100 feet)	70	Vacuum cleaner at 3 meters (10 feet)
Commercial area Heavy traffic at 90 meters (300 feet)	60	Normal speech at 1 meter (3 feet)
Quiet urban daytime	50	Large business office Dishwasher, next room
Quiet urban nighttime	40	Theater, large conference room (background)
Quiet suburban nighttime	30	Library
Quiet rural night time	20	Bedroom at night, concert hall (background)
—	10	Broadcast/recording studio
Lowest threshold of human hearing	0	Lowest threshold of human hearing

Source: Caltrans 2013a.

Note: dBA = A-weighted decibel.

L_{eq} is a sound energy level averaged over a specified period (typically no less than 15 minutes for environmental studies). L_{eq} is a single numerical value that represents the amount of variable sound energy received by a receptor during a time interval. For example, a 1-hour L_{eq} measurement would represent the average amount of energy contained in all the noise that occurred in that hour. L_{eq} is an effective noise descriptor because of its ability to assess the total time-varying effects of noise on sensitive receptors. L_{max} is the greatest sound level measured during a designated time interval or event.

Unlike the L_{eq} metrics, L_{dn} and CNEL metrics always represent 24-hour periods, usually on an annualized basis. L_{dn} and CNEL also differ from L_{eq} because they apply a time-weighted factor designed to emphasize noise events that

occur during the evening and nighttime hours (when speech and sleep disturbance is of more concern). “Time weighted” refers to the fact that L_{dn} and CNEL penalize noise that occurs during certain sensitive periods. In the case of CNEL, noise occurring during the daytime (7:00 a.m.–7:00 p.m.) receives no penalty. Noise during the evening (7:00 p.m.–10:00 p.m.) is penalized by adding 5 dB, while noise occurring during the nighttime (10:00 p.m.–7:00 a.m.) is penalized by adding 10 dB. L_{dn} differs from CNEL in that the daytime period is 7:00 a.m.–10:00 p.m., thus eliminating the evening period. L_{dn} and CNEL are the predominant criteria used to measure roadway noise affecting residential receptors. These two metrics generally differ from one another by no more than 0.5 dB to 1 dB and as such, noise analysis often treats these metrics as equivalent to one another.

Vibration

Vibration is an oscillatory motion through a solid medium in which the motion’s amplitude is in terms of displacement, velocity, or acceleration. Vibration can be a serious concern, causing buildings to shake and rumbling sounds. In contrast to noise, vibration is not a common environmental problem. It is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. Some common sources of vibration are trains, buses on rough roads, and construction activities, such as blasting, pile driving, and heavy earthmoving equipment.

Vibration analysis uses several different methods to quantify vibration. According to the Federal Transit Administration, peak particle velocity (PPV) is the maximum instantaneous peak of the vibration signal. Vibration analysis typically uses PPV to describe vibration impacts to buildings and measures the impact in inches/second (FTA 2018). Vibration analysis typically uses the root mean square amplitude to describe the effect of vibration on the human body, defined as the average of the squared amplitude of the signal. Vibration analysis uses the decibel notation to measure root mean square. The decibel notation acts to compress the range of numbers required to describe vibration.

High levels of vibration may cause physical personal injury or damage to buildings. However, vibration levels rarely affect human health. Instead, most people consider vibration to be an annoyance that can affect concentration or disturb sleep. In addition, high levels of vibration can damage fragile buildings or interfere with equipment that is highly sensitive to vibration (e.g., electron microscopes). Most perceptible indoor vibration is from sources within buildings, such as operation of mechanical equipment, movement of people, or slamming of doors. Typical outdoor sources of perceptible vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If the roadway is smooth, the vibration from traffic is rarely perceptible.

Sensitive Receptors

Noise- and vibration-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas are noise and vibration sensitive, and may warrant unique measures to protect from intruding noise. Sensitive receptors near the Project Site include residential uses located to the north, east, southeast, and west of the Project Site. The residential uses north of the Project Site are the closest sensitive receptors, located approximately 10 feet from the boundary of the Project Site. These sensitive receptors represent the nearest sensitive land uses with the potential for the Proposed Project to impact because of construction or operation of the Proposed Project.

Existing Noise Conditions

On April 23, 2019, a Dudek noise specialist conducted noise monitoring in the field and recorded ambient noise measurements with a sound-level meter, near the Project Site. The purpose of the noise monitoring is to characterize the existing noise levels (Figure 11, Noise Measurement/Modeling Locations). Table 17 provides the location, date, and time the noise measurements were taken. The sound-level meter equipment used to record noise measurements is a Soft dB Piccolo sound-level meter equipped with a 0.5-inch, pre-polarized condenser microphone with pre-amplifier. The sound-level meter meets the current American National Standards Institute standard for a Type 2 (General Use) sound-level meter. The Dudek noise specialist used a field calibrator to verify the accuracy of the sound-level meter, before and after the noise measurements were taken. Additionally, the Dudek noise specialist took the noise measurements with the microphone positioned approximately 5 feet above the ground.

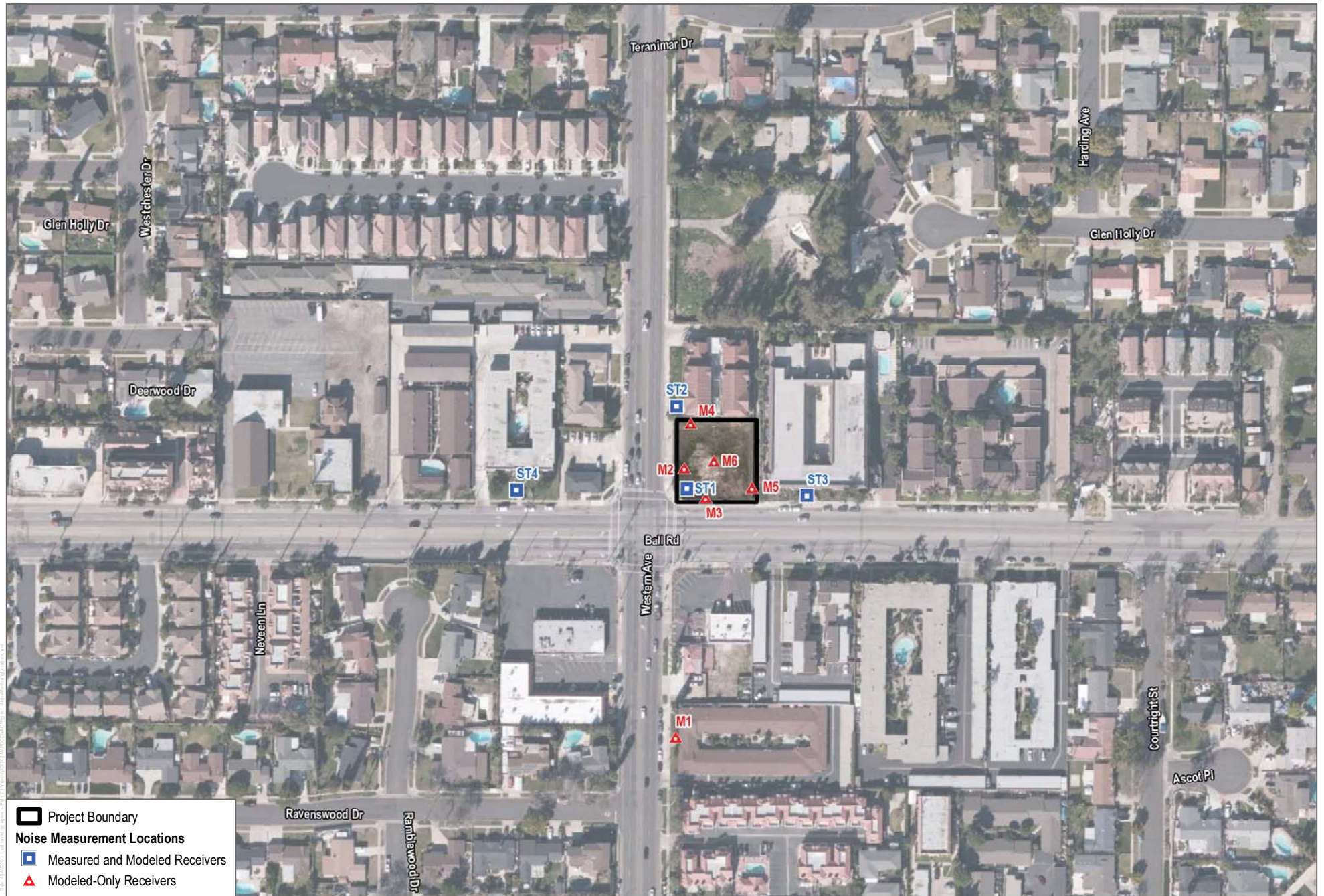
Table 17. Measured Noise Levels

Receptors	Location	Date	Time	L _{eq} (dBA)	L _{max} (dBA)
ST1	On-site, adjacent to the corner of South Western Avenue and West Ball Road	4/23/19	10:38 a.m. to 10:53 a.m.	71.6	83.5
ST2	North of Project Site, east of South Western Avenue and multifamily residences	4/23/19	11:03 a.m. to 11:18 a.m.	70.5	85.2
ST3	East of Project Site, north of West Ball Road and multifamily residences	4/23/19	11:37 a.m. to 11:52 a.m.	71.5	84.7
ST4	West of Project Site, north of West Ball Road and multifamily residences	4/23/19	12:02 p.m. to 12:17 p.m.	70.6	81.7

Source: Appendix H.

Notes: L_{eq} = equivalent continuous sound level (time-averaged sound level); L_{max} = maximum sound level during the measurement interval; dBA = A-weighted decibels.

Dudek conducted short-term noise measurements at four locations (ST1 through ST4) adjacent to the Project alignment. ST1 represents the existing ambient noise levels on site near the corner of South Western Avenue and West Ball Road. ST2 is located along the east side of South Western Avenue, and represents ambient noise levels at the adjacent multifamily residences. ST3 and ST4 are located east and west of the Project Site, respectively, and represent existing ambient noise levels at the multifamily residences located there. Table 17 provides the measured energy-averaged (L_{eq}) and maximum (L_{max}) noise levels for these locations. Appendix H provides the field noise measurement data sheets. The primary noise sources at the sites identified in Table 17 consisted of traffic on Western Avenue and Ball Road. As shown in Table 17, the measured sound levels ranged from approximately 71 dBA to 72 dBA L_{eq}.



SOURCE: County of Orange 2020; Bing Maps

FIGURE 11
Noise Measurement / Modeling Locations

3175 West Ball Road

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Regulatory Setting

The City of Anaheim General Plan and Municipal Code contains standards that regulate the exposure of persons to or the generation of excessive noise levels. The General Plan Noise Element includes the following goals and policies regarding noise that are applicable to the Proposed Project:

Goal 1.1

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

Policies:

1. Update City regulations to adopt Land Use Compatibility for Community Noise Exposure and California Interior and Exterior Noise Standards as appropriate.
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.
3. Consider the compatibility of proposed land uses with the noise environment when preparing, revising or reviewing development proposals.
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.
5. Encourage proper site planning and architecture to reduce noise impacts.
6. Discourage the siting of sensitive uses in areas in excess of 65 dBA CNEL without appropriate mitigation.
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.

Policies

1. 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.
2. Require that development generating increased traffic and subsequent increases in the ambient noise level adjacent to noise-sensitive land uses provide appropriate mitigation measures.

Goal 3.1

Protect residents from the effects of “spill over” or nuisance noise emanating from the City’s activity centers.

Policies

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.
2. 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.
3. Require that construction equipment operate with mufflers and intake silencers no less effective than originally equipped.
4. 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.

In addition to the General Plan Noise Element, the City of Anaheim Municipal Code contains the following ordinances regarding noise that are applicable to the Proposed Project:

Chapter 6.70 Sound Pressure Levels

Section 6.70.010 Established

Sound produced in excess of the sound pressure levels permitted herein are hereby determined to be objectionable and constitute 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 sixty 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 (3) readings taken at two (2) minute intervals. To have valid readings, the levels must be five (5) decibels or more above the levels prevailing at the same point when the source's 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 sounds 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. (Ord. 2526 § 1 (part); June 18, 1968; Ord. 3400 § 1; February 11, 1975; Ord. 6020 § 1; April 25, 2006.)

Section 18.40.090 - Sound Attenuation For Residential Developments

Section 18.40.090 of the City's Municipal Code addresses noise levels for new residential developments involving the construction of two or more dwelling units and located within six hundred feet of any railroad, freeway, expressway, major arterial, primary arterial or secondary arterial, as designated by the Circulation Element of the General Plan. According to the Circulation Element of the General Plan, West Ball Road is identified as a Primary Arterial, and Western Avenue is identified as a Secondary Arterial, and because the Project Site fronts both of these roadways, the provisions of Section 18.40.090 are applicable to the Proposed Project. Per Section 18.40.090, 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. Additionally, the Planning Commission may grant a deviation from the requirements, provided the evidence presented shows that all of the following conditions exist:

- The deviation from prescribed levels does not pertain to interior noise levels;
- The deviation does not exceed five (5) dB CNEL above the prescribed levels for exterior noise; and
- Measures to attenuate noise to the prescribed levels would compromise or conflict with the aesthetic value of the project.

Significance Thresholds

An increase of 3 dBA is considered barely perceivable to most healthy ears. Typically, an increase of 5 dBA or greater is considered one of significance, as such an increase is considered readily perceptible. According to the City of Anaheim General Plan/Zoning Code Update EIR's Noise Section 5.10.3, Thresholds of Significance:

Mobile-source noise (i.e., vehicle noise) is preempted from local regulation, but is still subject to CEQA. Here, a change of 5 dBA would denote a significant impact if their resultant noise level were to remain within the objectives of the General Plan (e.g., 65 dBA (CNEL) at a residential location), or 3 dBA if the resultant level were to meet or exceed the objectives of the General Plan (Caltrans defines a noise increase as substantial when the predicted noise levels with the project would exceed existing noise levels by 12 dBA Leq.). Also note that an impact is only potentially significant if it affects a receptor. An increase in noise in an uninhabited location would not denote a significant impact.

- a) ***Would the project result in 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?***

Short-Term Construction Impacts

Less-than-Significant Impact With Mitigation Incorporated. Construction noise and vibration levels are temporary phenomena, which can vary from hour to hour and day to day, depending on the equipment in use, the operations, and the distance between the source and receptor.

Equipment that would be in operation during proposed construction would include, in part, excavators, concrete saws, compressors, welders, and paving equipment. Table 18 presents typical maximum noise levels for various pieces of construction equipment at a distance of 50 feet (note that these are maximum

noise levels). Typically, construction equipment operates in alternating cycles of full power and low power, producing average noise levels less than the maximum noise level presented in Table 18. The average sound level of construction activity also depends on the amount of time that the equipment operates and the intensity of construction activities during that time.

Table 18. Typical Construction Equipment Noise Emission Levels

Equipment	Typical Sound Level (dBA) 50 Feet from Source
Air compressor	81
Backhoe	80
Compactor	82
Concrete mixer	85
Concrete pump	82
Concrete vibrator	76
Crane, mobile	83
Dozer	85
Generator	81
Grader	85
Impact wrench	85
Jackhammer	88
Loader	85
Paver	89
Pneumatic tool	85
Pump	76
Roller	74
Saw	76
Truck	88

Source: FTA 2018.

Note: dBA = A-weighted decibels.

For the equipment typically used to complete a development project such as the Proposed Project, the maximum noise levels at 50 feet would be approximately 89 dBA, although the hourly noise levels would vary. Construction noise in a well-defined area typically attenuates at approximately 6 dB per doubling of distance. Project construction would take place within approximately 20 feet of the nearest noise-sensitive land uses (residences to the north). More typically, construction would take place both far and near relative to any of the nearby residences; the typical construction source – receiver distance would be approximately 50 feet.

The Federal Highway Administration's Roadway Construction Noise Model (RCNM) (FHWA 2008) was used to estimate construction noise levels. Although the Federal Highway Administration funded and promulgated the model, noise analysis often uses the RCNM for non-roadway projects because Project Applicants for non-roadway projects typically use the same types of construction equipment used for roadway projects. Input variables for the RCNM consist of the receiver/land use types, the equipment type and number of each (e.g., two graders, a loader, a tractor), the duty cycle for each piece of equipment (e.g., percentage of hours the equipment typically works per day), and the distance from the noise-sensitive receiver. The modeling for the Proposed Project did not assume any topographical or structural shielding. The RCNM has default duty-cycle values for the various pieces of equipment; the RCNM derived these

defaults from an extensive study of typical construction activity patterns. Dudek's noise analysis used these default duty-cycle values.

Construction scenario assumptions, including phasing and equipment mix, were based on the CalEEMod default values developed for the air quality and GHG emissions impacts analysis. Dudek assessed the construction noise levels at two distances for each Project phase. The first represents the anticipated construction noise that may be experienced at the nearest sensitive receptor (residences nearest to the Proposed Project, located to the north) when construction equipment is operating at the nearest Project boundary. The second represents the anticipated construction noise experienced at the nearest residences during typical conditions, when construction equipment would operate both near and far from the nearest Project boundary. Table 19 summarizes these estimated construction noise levels, with separate calculations provided for the different types of construction activities that would occur for this Project. Appendix H provides the RCNM inputs and outputs.

Table 19. Construction Noise Model Results Summary

Construction Phase	Construction Noise at Representative Receiver Distances (Leq (dBA))	
	<i>Nearest Residence/Nearest Construction Activity (approx. 25 feet away)</i>	<i>Nearest Residence/Typical Construction Activity Distance (approx. 50 feet away)</i>
Demolition	93	86
Site preparation	91	84
Grading	92	85
Building construction	88	82
Paving	86	80
Architectural coatings	82	74

Source: Appendix G.

Notes: Leq = equivalent sound level; dBA = A-weighted decibel.

As shown in Table 19, the construction noise levels at the nearest noise-sensitive land uses (existing residences located north of the Project Site) are predicted to range from approximately 82 to 93 dBA Leq when construction would take place adjacent to the northern project boundary. More typically, when construction would occur at locations throughout the Project Site, noise levels would range from approximately 74 to 86 dBA Leq.

As previously discussed, the Anaheim Municipal Code exempts construction noise from the City's stationary noise standards, if the construction takes place between the hours of 7:00 a.m. and 7:00 p.m. The City and the Applicant both expect that construction activities associated with the Proposed Project would take place exclusively within the permitted hours.

Although the Proposed Project would expose nearby residences to construction noise levels that would be audible at times, the exposure would be short term and would cease upon completion of the construction of the Proposed Project. Project-related construction noise would not violate the City's standards for construction noise. Therefore, short-term construction impacts associated with an exceedance of applicable noise standards would be less than significant.

However, construction noise levels would be higher at times than existing ambient daytime noise levels; particularly within proximity of the Applicant's proposed construction activities (see Tables 16 and 19). Therefore, noise impacts from construction could be potentially significant. However, MM-NOI-1 (Construction Noise Reduction) would reduce construction noise associated with the Proposed Project and MM-NOI-2 (Notification) would ensure that the Project Applicant informs nearby receptors of construction activities. The effectiveness of the measures listed in MM-NOI-1 would vary from several dB (which in general is a relatively small change) to 10 or more dB (which would be as a substantial change). The range of effectiveness would vary based on various factors, including the equipment in use, the original condition of the equipment, the specific location of the noise source and receiver, and others. Installation of a temporary noise barrier, for example, would vary in effectiveness depending upon the degree to which the line-of-sight between the source and receiver is broken. The noise reduction achieved by a barrier typically ranges from 5 dB to 10 dB. The noise reduction achieved by equipment silencers would range from several dB to well over 10 dB. Limiting equipment idling could reduce overall noise levels up to several dB. However, the measures listed in MM-NOI-1, when applied in conjunction, would result in a substantial decrease in construction noise. Additionally, while MM-NOI-2 would not reduce construction noise levels, it would ensure that receptors in the Project area are prepared for any nuisances that may occur, and would allow them to plan accordingly. Upon implementation of MM-NOI-1 and MM-NOI-2, impacts would be less than significant.

MM-NOI-1 Prior to issuance of Grading or Building Permits, the property owner/developer and/or its construction contractor, shall submit plans to the Planning and Building Department with notes indicating compliance with the following measures during construction:

1. Construction activities shall be permitted only between the hours of 7:00 a.m. and 7:00 p.m. In the event that construction is required to extend beyond these times, extended hours permits shall be required.
2. Pumps and associated equipment (e.g., portable generators) shall be shielded from sensitive uses using local temporary noise barriers or enclosures, or shall otherwise be designed or configured so as to minimize noise at nearby noise-sensitive receivers.
3. Staging of construction equipment shall not occur within 20 feet of any noise- or vibration-sensitive land uses.
4. All noise-producing equipment and vehicles using internal combustion engines shall be equipped with mufflers; air-inlet silencers where appropriate; and any other shrouds, shields, or other noise-reducing features in good operating condition that meet or exceed original factory specification. Mobile or fixed "package" equipment (e.g., arc-welders, air compressors) shall be equipped with shrouds and noise control features that are readily available for that type of equipment.
5. All mobile or fixed noise-producing equipment used for the Project that are regulated for noise output by a local, state, or federal agency shall be in compliance with regulations.
6. Idling equipment shall be kept to a minimum and moved as far as practicable from noise-sensitive land uses.
7. Electrically powered equipment shall be used instead of pneumatic or internal combustion powered equipment, where feasible.

8. Material stockpiles and mobile equipment staging, parking, and maintenance areas shall be located as far as practicable from noise-sensitive receptors.
9. The use of noise-producing signals, including horns, whistles, alarms, and bells, shall be used for safety warning purposes only.

MM-NOI-2 Prior to issuance of Grading and Building Permits, the property owner/developer shall submit evidence to the Planning and Building Department that effective communication with local residents will be maintained prior to and during construction. Specifically, the property owner/developer or their representative shall inform local residents of the schedule, duration, and progress of the construction. Additionally, the property owner/developer shall provide residents contact information for noise- or vibration-related complaints. Evidence of compliance may include copies of letters and mailing lists for adjacent property owners and residents, photographs of posting of information on site, or any other such information as deemed compliant by the Planning and Building Director and/or his/her designee.

Long-Term Operational Impacts

Less-Than-Significant Impact with Mitigation Incorporated. Long-term operational noise associated with the Proposed Project would primarily consist of off-site traffic noise along adjacent roadways (specifically along South Western Avenue and Ball Road). In addition, the proposed residences on site would be subject to traffic noise from South Western Avenue and Ball Road. The Proposed Project would also generate conversational noise from people; music; children playing; dogs barking; car startups; car alarms; vehicles entering and exiting private driveways; noise from heating, ventilation, and air conditioning units; and noise from landscape maintenance activities. However, these secondary noise sources would not be of a type or scale that would be unusual or otherwise incompatible with the adjacent land uses. The section below addresses the primary noise source (traffic noise).

Project-Related Traffic Noise Effects on Off-Site Receptors

The Proposed Project would generate traffic along South Western Avenue and Ball Road. The City does not have a specific noise criterion for evaluating off-site noise impacts to residences or noise-sensitive areas from Project-related traffic. For the purposes of this noise analysis, such impacts are considered significant when they result in an exceedance of the applicable noise standard (i.e., noise planning threshold of 65 dBA CNEL for noise-sensitive land uses) or cause an increase of 5 dBA compared to existing noise levels. An increase or decrease in noise level of at least 5 dBA is required before a noticeable change in community response would be expected (Caltrans 2013a). Thus, Project-related traffic resulting in the exceedance of the 65 dBA CNEL noise standard at a noise-sensitive land use not already in excess of the standard and/or in a clearly perceptible increase (+5 dBA) in noise levels is considered significant.

ADVANTEC Consulting conducted traffic modeling at noise measurement locations ST-2 through ST4, as well as at other off-site noise sensitive receiver locations (M1), to capture potential noise impacts in the surrounding area (Figure 11). Dudek assessed potential noise impacts from traffic using the Federal Highway Administration's Traffic Noise Model Version 2.5 (FHWA 2004). Information used in the model included site geometry; adjacent roadway speed limits; and the Existing, Existing plus Project, Future (General Plan Buildout)

without Project, and Future (General Plan Buildout) with Project traffic volumes, as provided in the Traffic Impact Analysis prepared for the Proposed Project (Appendix G, Traffic Impact Analysis).

Dudek modeled noise levels at representative existing off-site and future on-site noise-sensitive receivers (Figure 11). The modeling anticipated receivers at five feet above the local ground elevation, except for the future on-site receivers, for which the modeling anticipated receivers at ground level and at second-floor facade floor levels, as appropriate. Table 20, Traffic Noise (Existing and Existing plus Project) summarizes the results of the traffic modeling for the Existing and Existing plus Project scenarios. Appendix H, Noise, provides the Traffic Noise Model input/output files. As shown, project-related traffic would result in a noise level increase of 0 dB CNEL (when rounded to whole numbers) along Ball Road and Western Avenue Site. The additional traffic from the Proposed Project would be minimal in the context of the relatively high traffic volumes on the adjacent arterial roadways. Noise increases would be well below the significance threshold of 5 dB.

Table 20. Traffic Noise (Existing and Existing-Plus-Project)

Modeled Receptor	Existing Noise Level (dBA CNEL/L _{dn})	Existing plus Project Noise Level (dBA CNEL/L _{dn})	Noise Level Increase (dB)
ST1: On-site, adjacent to the corner of South Western Avenue and West Ball Road	70	70	0
ST2: North of Project Site, east of South Western Avenue and multifamily residences	70	70	0
ST3: East of Project Site, north of West Ball Road and multifamily residences	67	67	0
ST4: West of Project Site, north of West Ball Road and multifamily residences	67	67	0
M1: South of Project Site, east of South Western Avenue (multifamily residences)	68	68	0

Source: Appendix H.

Notes: CNEL = community noise equivalent level; dB = decibel; dBA = A-weighted decibel; L_{dn} = day-night average sound levels

Table 21, Traffic Noise (Future and Future with Project) summarizes the noise levels associated with traffic under future (i.e., General Plan Buildout) without the Proposed Project and with the Proposed Project. The change in traffic noise levels associated with the Proposed Project would be 0 dB (rounded to whole numbers) compared to the without Project noise levels. These changes would be well below the significance threshold of 5 dB. Therefore, long-term operational impacts associated with project-related traffic noise would be less than significant.

Table 21. Traffic Noise (Future and Future Plus Project)

Modeled Receptor	Future (General Plan Buildout) without Project Noise Level (dBA CNEL/L _{dn})	Future (General Plan Buildout) with Project Noise Level (dBA CNEL/L _{dn})	Noise Level Increase (dB)
ST1: On-site, adjacent to the corner of South Western Avenue and West Ball Road	71	71	0

Table 21. Traffic Noise (Future and Future Plus Project)

Modeled Receptor	Future (General Plan Buildout) without Project Noise Level (dBA CNEL/L _{dn})	Future (General Plan Buildout) with Project Noise Level (dBA CNEL/L _{dn})	Noise Level Increase (dB)
ST2: North of Project Site, east of South Western Avenue and multifamily residences	70	70	0
ST3: East of Project Site, north of West Ball Road and multifamily residences	68	68	0
ST4: West of Project Site, north of West Ball Road and multifamily residences	67	67	0
M1: South of Project Site, east of South Western Avenue (multifamily residences)	69	69	0

Source: Appendix H

Note: CNEL = community noise equivalent level; dB = decibel; dBA = A-weighted decibel; L_{dn} = day-night average sound levels

Off-Site Traffic Noise Effects on On-Site Receptors

Exterior Noise Levels

Table 22, Traffic Noise (Future with Project) at On-Site Residential Receivers, provides the results of the noise analysis for traffic noise levels at proposed on-site noise-sensitive receivers. On-site future noise-sensitive receiver locations consisted of the exterior facades of the second- and third-floor levels facing South Western Avenue and West Ball Road, as well as the enclosed second-floor level courtyard area. Per the Proposed Project plans, none of the proposed residential units would have usable outdoor private spaces (i.e., patios or balconies). In addition, the first-floor level would consist of a parking garage, partially below-grade. Therefore, the first-floor level is not noise-sensitive and the modeling did not include this level for the purposes of potential on-site noise impacts.

As shown in Table 22, the results of the noise modeling indicate that exterior on-site noise levels would range from approximately 64 to 70 dBA CNEL at second- and third-floor facade elevations. The common exterior area (i.e., the interior courtyard) noise level would be approximately 35 dBA CNEL. The common area space would comply with the City noise standard for transportation noise for residential areas (65 dBA CNEL). Per the Proposed Project plans, none of the proposed residential units would have usable outdoor private spaces (i.e., patios or balconies). Therefore, long-term operational impacts associated with off-site traffic noise on the Project Site's exterior spaces would be less than significant.

Table 22. Traffic Noise (Future with Project) at On-Site Residential Receivers

Receiver Location	2nd floor Noise Level (dBA CNEL/L _{dn})	3rd floor Noise Level (dBA CNEL/L _{dn})
M2: Proposed residential units - west side	70	70
M3: Proposed residential units - south side	70	70

Table 22. Traffic Noise (Future with Project) at On-Site Residential Receivers

Receiver Location	2nd floor Noise Level (dBA CNEL/L _{dn})	3rd floor Noise Level (dBA CNEL/L _{dn})
M4: Proposed residential units - north side	64	64
M5: Proposed residential units - east side	64	64
M6: Interior courtyard	35	n/a

Source: Appendix H.

Notes: n/a = Not applicable (no second-floor courtyard).

Interior Noise Levels

The City and the state require that interior noise levels not exceed an L_{dn}/CNEL of 45 dBA within the habitable rooms of residences. Typically, with the windows open, building shells provide approximately 15 dB of noise reduction. Thus, rooms exposed to an exterior CNEL/L_{dn} greater than 60 dBA could result in an interior CNEL/L_{dn} greater than 45 dB. The California Building Code recognizes this relationship and, therefore, requires interior noise studies when exterior noise analysis projects noise levels to exceed 60 dBA CNEL/L_{dn}.

The data shown in Table 22 indicates that the Future with Project noise levels at the facades of the proposed residential units with a side-exposure (i.e., the north-facing and east-facing sides of the building) would be approximately 64 dBA CNEL/L_{dn}. The Future with Project noise levels at the facades of the proposed residential units adjacent to South Western Avenue and West Ball Road (i.e., the south-facing and west-facing sides of the building) would be approximately 70 dBA CNEL/L_{dn}. Thus, the unmitigated interior noise level within the habitable rooms of these dwelling units could exceed the 45 dBA L_{dn} noise criterion. With the 45 dBA CNEL/L_{dn} interior limit and the calculated exterior traffic noise levels shown in Table 22, the required attenuation (reduction) due to the residential building construction elements can be calculated. Based on those details, the required minimum attenuation is 19 dBA (64 dBA–45 dBA), or 19 Sound Transmission Class (STC) points for the north- and east-facing sides of the building, and 25 dBA (70 dBA–45 dBA), or 25 STC points for the south- and west-facing sides of the building.

Hopkins (2015) states that the attenuation performance of a building shell by the relative area (in square feet) that is composed of solid wall, windows, or doors. If each component has an STC rating high enough to satisfy the attenuation target, then it is not necessary to evaluate the composite wall STC rating. However, if there are components that have an STC rating below the target, then the analysis must identify the area of each component in order to perform a more detailed analysis. For residential structures meeting standard civil codes and architectural standards, the walls, roof and doors will far exceed the minimum needed STC ratings of 19 (for north- and east-facing residential units) and 25 (for south- and west-facing residential units). The building component with a potential to not meet or exceed the minimum STC rating would be the windows. Because the building's design details (such as window type) have not yet been completed, a MM-NOI-3 is provided requiring that the windows selected for habitable rooms have minimum STC ratings of 19 – 25 and would thus provide sufficient noise reduction to ensure that the interior noise level would be 45 dBA CNEL/L_{dn} or less. Therefore, with mitigation noise impacts with regard to interior noise levels would be less than significant.

MM NOI-3 Prior to issuance of a building permit, the property owner/developer shall submit final design plans, to the City of Anaheim Planning and Building Department, specifying that windows in habitable rooms will have the following minimum Sound Transmission Class (STC) ratings:

- Windows with northern and eastern-facing exposures: 19 STC or greater
- Windows with southern and western-facing exposures: 25 STC or greater

By specifying windows with these minimum STC ratings, the proposed residential design will result in compliance with the 45 dBA CNEL/ L_{dn} interior noise levels as required by the California Building Code and California Noise Insulation Standards (Title 24 and 25 of the California Code of Regulations) and the City of Anaheim.

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

Less-than-Significant Impact. Construction activities that might expose persons to excessive ground-borne vibration or ground-borne noise could cause a potentially significant impact. Neither the Anaheim Municipal Code nor the General Plan provides a quantifiable vibration threshold. However, the General Plan EIR utilized a vibration threshold of 0.2 inch per second PPV threshold to determine vibration impacts associated with implementation of the General Plan. Research performed by Caltrans (Caltrans 2013b) derived the 0.2 inch per second PPV threshold. Since the City has utilized the 0.2 inch per second PPV threshold, it is also utilized in the analysis of vibration impacts for the Proposed Project.

Information from Caltrans indicates that the vibration analysis may characterize transient vibrations (such as construction activity) with a PPV of approximately 0.035 inches/second as barely perceptible, and vibration levels of 0.24 inches/second as distinctly perceptible. The heavier pieces of construction equipment, such as bulldozers, would have PPV of approximately 0.089 inches/second or less at a distance of 25 feet (FTA 2018).

Ground-borne vibration attenuates over short distances. At the existing residential uses nearest to the construction area (approximately 25 feet) and with the anticipated construction equipment, the PPV would be approximately 0.089 inches/second at the residences when construction occurs at or near the northern Project boundary. Thus, vibration would likely be perceptible for the nearest residences to the Project Site when heavy equipment is operating along the northern and eastern boundaries of Project Site but would be below the City's vibration threshold of 0.2 inches/second.

The Proposed Project consists of a residential development, which the property owner/developer does not anticipate to include any machinery or activities capable of producing substantial levels of groundborne vibration. Thus, concerning the entire Proposed Project, impacts associated with ground-borne vibration would be less than significant.

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

No Impact. The nearest airport is Los Alamitos Army Airfield, located approximately 2.5 miles to the southwest. Fullerton Municipal Airport is located approximately 3.8 miles to the north-northeast. According to the City General Plan Noise Element (City of Anaheim 2004), the City is not located within the 65 dBA CNEL noise contours for any commercial or private airports, and fixed-wing aircraft are typically too high to add measurably to local noise. Additionally, no private airstrips are located in the Project vicinity. Therefore, no impacts associated with public or private airport noise would occur.

3.14 Population and Housing

	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
XIV. 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Less-than-Significant Impact. SCAG is the federally designated Metropolitan Planning Organization for six Southern California counties, including Orange County. SCAG develops plans for transportation, growth management, and hazardous waste management, and develops a regional growth forecast, which forms a foundation for SCAG's regional plans and regional air quality plans developed by the South Coast Air Quality Management District.

SCAG prepares several plans to analyze and address regional growth, including the Regional Housing Needs Assessment (RHNA). The RHNA is mandated by the State Housing Law as part of a periodic process of updating local housing elements in city and county general plans. The RHNA contains a forecast of housing needs within each jurisdiction in the SCAG region for 8-year periods. The 5th Cycle RHNA Allocation Plan, the RHNA that is currently in effect, covers a planning period of October 2013 through October 2021. The RHNA shows a need for 412,721 additional housing units within the SCAG region. Of the SCAG region

allocation, the total assigned to the City is 5,702 units (SCAG 2012). Once the RHNA is established, local jurisdictions decide how to address their housing needs through the process of updating general plan housing elements. The City's latest housing element was produced in 2014 for the years 2014–2021. SCAG is in the process of developing the sixth cycle RHNA allocation plan, which will be in effect from October 2021 through October 2029.

The Proposed Project would directly induce population growth in the City by constructing 11 apartment units on a property that currently does not include residential land uses. Pursuant to the household estimates provided in the SCAG 2019 Local Profiles Report, the average household size in the City in the year 2018 is 3.5 persons per household (SCAG 2019a). Based on this assumption, the proposed 11 residential units could generate 38 persons upon completion in 2022.

Figure 2-1 of the City General Plan Housing Element (City of Anaheim 2020a) indicates that the City anticipates an additional 28,456 new residents between 2020 and 2030. The 38 new residents generated by the Proposed Project would represent less than 1% of the 28,456 new residents expected. In addition, as discussed in the Project Description and Section 3.19, Utilities and Service Systems, utilities and infrastructure are already in place for the Project Site to support the Proposed Project and its new residents. Further, the Proposed Project would assist the City in meeting its housing needs by converting an undeveloped infill commercial area into new housing opportunities. The Proposed Project would also contribute to state-mandated RHNA housing goals and would be consistent with regional efforts to boost housing growth to meet regional housing needs. In its 5th cycle RHNA, SCAG identifies the City's share of housing needs as 5,702 new units (SCAG 2012). In response to the RHNA allocation, cities must update the Housing Element of the General Plan to address how to meeting the housing needs allocation. Cities must prepare an annual progress report on the jurisdiction's status and progress in implementing its housing element, and thus, meeting its RHNA allocation. According to the 5th cycle annual progress report permit summary, maintained by the California Department of Housing and Community Development, as of June 2019, the City has issued 6,376 permits for housing developments. However, not all of the issued housing permits meet the requirements of categories in the 5th Cycle RHNA Allocation Plan, such as housing permits for very low income and low income housing, and therefore the City still has a deficiency of 3,059 permits across these RHNA categories, and additional housing development is needed in the City (HCD 2019). Further, as previously indicated, SCAG is in the process of developing the sixth cycle RHNA allocation plan, which is expected to be adopted by October 2020, and would be in effect from 2021 through 2029. While the 6th cycle RHNA methodology is still awaiting approval, the estimated allocation for the City would be 17,412 housing units (SCAG 2019b). Therefore, the Proposed Project would not result in substantial unplanned population growth in the City as a result of increased housing opportunities, as the number of new residents generated by the Proposed Project (i.e., 38) would be a nominal increase over what is currently anticipated (i.e., less than 1% growth); infrastructure is already in place for the Project Site to support the Proposed Project and its new residents; and the Proposed Project would assist the City and region in meeting housing needs. Therefore, impacts associated with population growth would be less than significant.

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

No Impact. No residential land uses currently exist on the Project Site, and the Proposed Project would not displace any existing housing. As such, the Project Site also does not presently support a residential population and would not displace any people. Therefore, no impacts associated with displacement of people would occur.

3.15 Public Services

	Potentially Significant Impact	Less-Than- Significant Impact With Mitigation Incorporated	Less-Than- Significant Impact	No Impact
XV. PUBLIC SERVICES				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Fire protection?

Less-than-Significant Impact. The Anaheim Fire and Rescue (AFR) provide fire protection services in the City. The AFR operates 11 fire stations composed of 11 engine companies and 6 truck companies, and employs approximately 200 firefighters, 2 battalion chiefs, and various other support staff (AFR 2020). The AFR is responsible for all fire, rescue, and medical aid calls throughout the City. AFR #11 (3100 West Orange Avenue) is the closest fire station to the Project Site, located approximately 0.8 miles via local roads from the site. The second nearest fire station is AFR #4 (2736 West Orange Avenue), which is roughly 1.7 miles via local roads from the Project Site. In 2019, the AFR received approximately 39,000 calls for service (City of Anaheim 2020d). In the context of the entire City's population, which the California Department of Finance, Demographic Research Unit estimates to be 357,325 as of January 1, 2020 (DOF 2020), the AFR received approximately 1.1 calls per 10 residents in the City per year. As discussed previously, the Proposed Project involves the development of an 11-unit apartment complex, which would support an estimated 39 persons. Assuming an approximate call generation rate of 1.1 calls per 10 residents per year, the Proposed Project would generate approximately 5 calls per year. Given the minimal number of calls for service that could potentially be generated by future occupants at the Project Site, it is anticipated that AFR would be able to accommodate the Proposed Project without the need for new or physically altered governmental facilities. Further, the Project Site is located in a developed portion of the City that is within the existing service area of the AFR, which eliminates the need to extend the service area of AFR. Additionally, impacts to fire services are anticipated to be adequately funded by an increase in tax revenue, over an extended period of time, relative to the increase in development intensity. Additional fire personnel and associated

facilities and equipment would be provided through the annual Operating Budget and Capital Improvement Program review process. As part of this annual process, fire department needs would be assessed and budget allocations would be revised accordingly to ensure that adequate levels of service are maintained throughout the City. As such, given the minimal number of calls for service that would potentially be generated by future occupants at the Project Site, the fact that the Project Site is within the existing service boundaries of the AFR, and the fact that the annual budget review process would ensure that adequate levels of service are maintained throughout the City, impacts associated with AFR facilities would be less than significant.

Police protection?

Less-than-Significant Impact. The Anaheim Police Department (APD) provides police protection services to the City. The APD operates out of its headquarters (425 South Harbor Boulevard), East Station (8201 East Santa Ana Canyon Road), and West Station (320 South Beach Boulevard), and employs approximately 400 sworn officers and a support staff of over 173 (City of Anaheim 2020d). The nearest police station to the Project Site is the headquarters (320 South Beach Boulevard), located approximately 1.3 miles via local roads from the Project Site. In 2019, the APD received approximately 192,000 calls for service (City of Anaheim 2020d). In the context of the entire City's population, which the California Department of Finance, Demographic Research Unit estimates to be 357,325 as of January 1, 2020 (DOF 2020), the AFR received approximately 5.37 calls per 10 residents in the City per year. As discussed previously, the Proposed Project involves the development of an 11-unit apartment complex, which would support an estimated 39 persons. Assuming an approximate call generation rate of 5.37 calls per 10 residents per year, the Proposed Project would generate approximately 21 calls per year. Given the minimal number of calls for service that could potentially be generated by future occupants at the Project Site, it is anticipated that APD would be able to accommodate the Proposed Project without the need for new or physically altered governmental facilities. Further, the Project Site is located in a developed portion of the City that is within the existing service area of the APD, which eliminates the need to extend the service area of APD. Additionally, impacts to fire services are anticipated to be adequately funded by an increase in tax revenue, over an extended period of time, relative to the increase in development intensity. Additional police personnel and associated facilities and equipment would be provided through the annual Operating Budget and Capital Improvement Program review process. As part of this annual process, police department needs would be assessed and budget allocations would be revised accordingly to ensure that adequate levels of service are maintained throughout the City. As such, given the minimal number of calls for service that would potentially be generated by future occupants at the Project Site, the fact that the Project Site is within the existing service boundaries of the APD, and the fact that the annual budget review process would ensure that adequate levels of service are maintained throughout the City, impacts associated with APD facilities would be less than significant.

Schools?

Less-than-Significant Impact. The Anaheim Elementary School District (AESD) provides elementary school education services (kindergarten through 6th grade) for students in the project area. The AESD is composed of 23 schools located throughout the City (AESD 2020). Twila Reid Elementary School (720 South Western Avenue) is the closest AESD school to the Project Site, located approximately 0.2 miles north. According to the California Department of Education, during the 2019–2020 school year, AESD had an enrollment of

16,928 students (CDE 2020a), which is a decline of approximately 2,236 students from 5 years ago (the 2014–2015 school year).

Regarding middle and high school educational services, the Anaheim Union High School District (AUHSD) serves students in 7th through 12th grades who live in the Project area. The Anaheim Union High School District is composed of 21 schools located throughout the central and western portions of the City (AUHSD 2017). Orangeview Junior High School (3715 West Orange Avenue) and Western High School (1765 West Cerritos Avenue) are the nearest AUHSD schools to the Project Site, located approximately 1.3 miles and 0.5 miles northwest, respectively, of the site. The California Department of Education indicates that enrollment was at 29,832 students for the 2019–2020 school year (CDE 2020b), which is a decline of approximately 1,827 students from 5 years ago (the 2014–2015 school year).

Using the student generation rates used in the City General Plan EIR, multi-family residential land uses generate .116 elementary school students, 0.013 middle school students, and 0.032 high school students per dwelling unit. At 11 residential units, the Project could generate approximately two elementary school students, one middle school student, and one high school student. Because the AESD and AUHSD experienced declines in student enrollment, it is likely that each school district has the capacity and facilities to accept what equates to a nominal increase in students generated by the Project.

In addition, the Project would be subject to SB 50, which requires the payment of mandatory impact fees to offset any impact to school services or facilities. In accordance with SB 50, the Applicant would pay its fair share of school impact fees based on the number of proposed dwelling units and square footage. Therefore, impacts associated with AESD and AUHSD facilities would be less than significant.

Parks?

Less-than-Significant Impact. The Proposed Project would include 11 residential units that would house approximately 39 residents. This analysis anticipates that at least a portion of these residents would patronize the various public park and recreation facilities located throughout the project area. The closest park to the Project Site is the Twila Reid Park, which is located 0.7 miles northeast of the site and provides a range of passive and active recreational amenities, including a playground, open play area, barbecues, a basketball court, softball field, and restroom facilities.

The Proposed Project would be subject to the state's Quimby Act, which requires development projects to set aside land, donate conservation easements, or pay in-lieu fees for park improvements. Pursuant to the Quimby Act, the Applicant would pay its fair share of in-lieu fees based on the number and type of dwelling units. In addition, the project would include common areas located throughout the Project Site. These areas include passive sitting areas with water features, barbecue and picnic areas, and courtyard areas between some of the condominium units. These on-site amenities would provide an alternative to off-site public parks and recreational facilities, allowing the project's residents to recreate on the Project Site while incrementally reducing the project's impacts to off-site public park and recreational facilities. Therefore, impacts associated with park facilities would be less than significant.

Other public facilities?

Less-than-Significant Impact. It is reasonable to assume that at least a portion of the approximately 39 residents generated by the Project would patronize public facilities such as local library branches operated

by the City. The Anaheim Public Library system consists of a central library, six branches, the Heritage Center, Books on the Go! (self-service kiosk at Anaheim Regional Transportation Intermodal Center), and a bookmobile. The Haskett Branch (2650 W Broadway) is the closest library to the Project Site, located approximately 2.1 miles northeast of the Project Site.

The Anaheim Public Library system has 308,223 library card holders with 1.3 million annual visits in FY 18/19. Haskett Library has 106,266 card holders with 183,010 annual visits during FY18/19 which translates to 587 visitors per day at the Haskett Library alone. The Project would add approximately 39 residents, which represents roughly 0.02% of the existing City residents served by the Anaheim Public Library system. Population growth affects online resources because the basis for licensing fees for these databases, eBooks, and other digital resources are generally the population of the library's service area. 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. However, the threshold for determining impacts pursuant to CEQA is based upon whether the project would 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. The impacts to the overall availability per capita of books, media, computers, and library public service space would not create significant physical or environmental impacts. Therefore, project-related impacts to library facilities would be less than significant and no mitigation measures are required.

3.16 Recreation

	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
XVI. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- 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. As mentioned in Section 3.14(a), pursuant to the household estimates provided in the SCAG 2019 Local Profiles Report, the average household size in the City in the year 2018 is 3.5 persons per household (SCAG 2019a). Based on this assumption, the proposed 11 residential units could generate 38 persons upon completion in 2022. This analysis anticipates that at least a portion of these residents would patronize the various public park and recreation facilities located throughout the Project area. The Proposed Project would be subject to the state's Quimby Act, which requires development projects to set aside land, donate conservation easements, or pay in-lieu fees for park improvements. Pursuant to the Quimby Act, the Project Applicant would pay its fair share of in-lieu fees based on the number and type of dwelling units. In addition, the Proposed Project would include common areas located throughout the Project Site. These areas include a courtyard area in the center of the Project Site and a recreation room on the third floor. These on-site amenities would provide an alternative to off-site public parks and recreational facilities, allowing the Project's residents to recreate on the Project Site while incrementally reducing the Project's impacts to off-site public park and recreational facilities. Therefore, impacts associated with the increased use of existing recreational facilities 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?***

Less-than-Significant Impact. The Proposed Project would include common areas located throughout the Project Site. These areas include a courtyard and a recreation room. These amenities would be fully contained on the Project Site and are part of the Proposed Project. As such, this IS/MND accounts for any potential environmental impacts related to the construction and operation of these on-site recreational amenities, as part of the impact assessment conducted for the entirety of the Project. No adverse physical effects beyond those already disclosed in this IS/MND would occur due to the implementation of the Proposed Project's on-site recreational facilities. Therefore, impacts associated with the construction or expansion of recreational facilities would be less than significant.

3.17 Transportation

	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
XVII.TRANSPORTATION – Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The California Natural Resources Agency adopted revised CEQA Guidelines on December 28, 2018. Among the changes to the guidelines was the removal of vehicle delay and level of service (LOS) from consideration for transportation impacts under CEQA. With the adopted Guidelines, transportation impacts are to be evaluated based on a project's effect on vehicle miles traveled (VMT). Lead agencies were allowed to continue using their current impact criteria until June 30, 2020, or to opt into the revised transportation guidelines as required in CEQA Section 15064.3. On June 23, 2020, the City of Anaheim City Council adopted the Vehicle Miles Travelled Thresholds of Significance for purposes of analyzing transportation impacts and also approved the *Traffic Impact Analysis Guidelines for California Environmental Quality Act Analysis* (TIA Guidelines) (City of Anaheim 2020e). For the purposes of this IS/MND, the Proposed Project's transportation impacts are evaluated using a VMT-based approach, consistent with CEQA Section 15064.3. Additionally, the City's General Plan Circulation Element contains policies relating to LOS and traffic congestion. While the revised CEQA Guidelines prohibit a lead agency from using vehicle delay and LOS to evaluate a Proposed Project's transportation impact, the following analysis provides the Proposed Project's consistency with these policies, as well as the City of Anaheim Criteria for Preparation of Traffic Impact Studies for informational purposes.

City of Anaheim General Plan and Traffic Impact Study Criteria Significance Thresholds

The City of Anaheim's General Plan Circulation Element (City of Anaheim 2020a) has the following policies relating to LOS and traffic congestion:

- **Goal 2.1:** Maintain efficient traffic operations on City streets and maintain a peak hour level of service not worse than D at street intersections.

In addition, the City's *Criteria for Preparation of Traffic Impact Studies* (City of Anaheim 2016b) establishes thresholds for project-related increases in traffic for roadway segments and intersections. For roadways, a project would create a significant impact if the roadway segments operates at LOS D, E, or F under peak-hour conditions and the project traffic increases the volume to capacity (V/C) ratio by 0.01 or greater. For intersections, a project would create a significant impact if it causes an intersection to operate from LOS D (minimum satisfactory LOS) or better, to LOS E or F with addition of project traffic, or if the project contributes the following V/C increases at LOS C, D, E, or F:

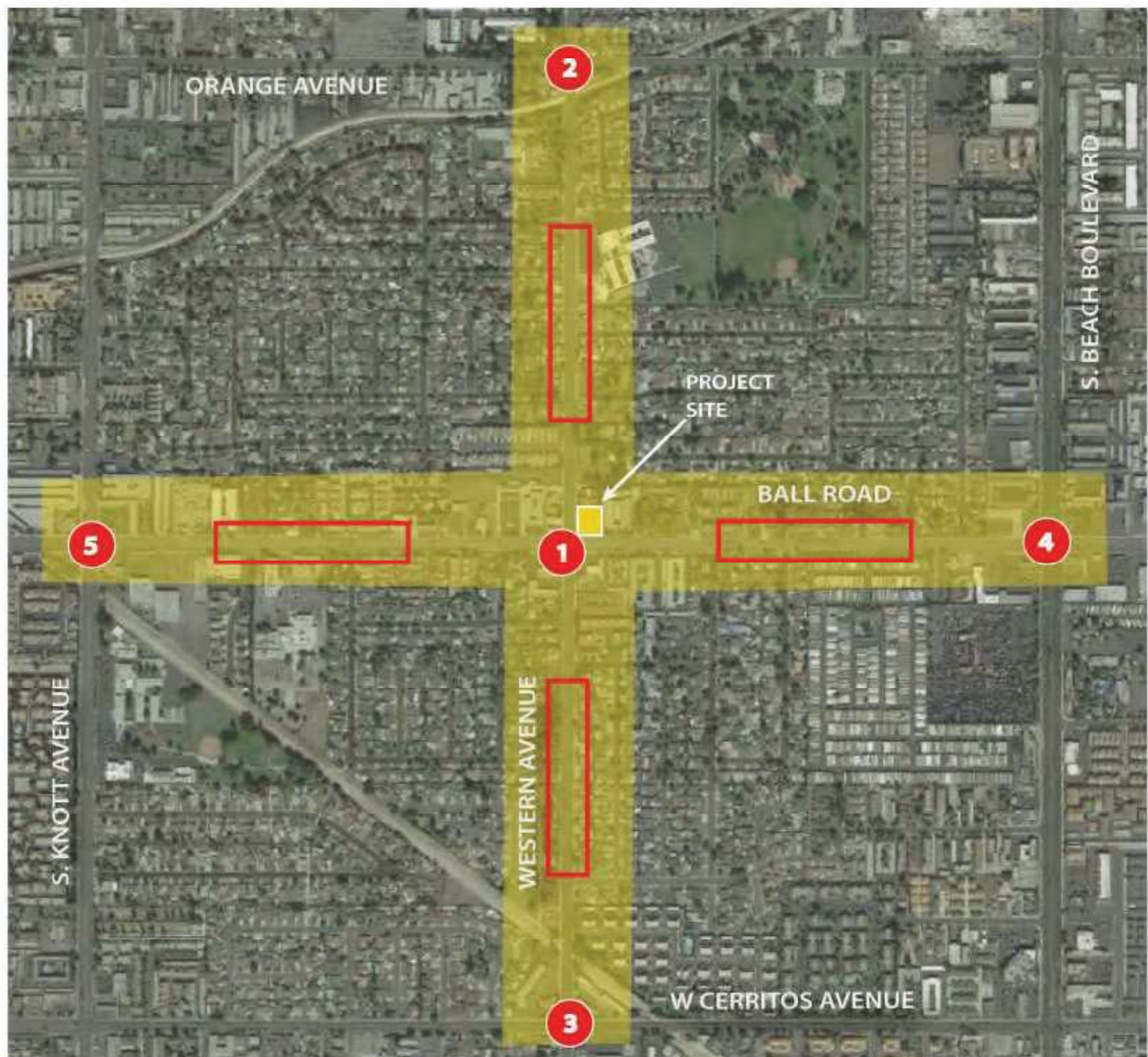
- Increase ≥ 0.050 if final V/C ratio $> 0.700 - 0.800$ (LOS C)
- Increase ≥ 0.030 if final V/C ratio $> 0.800 - 0.900$ (LOS D)
- Increase ≥ 0.010 if final V/C ratio > 0.900 (LOS E and F)

ADVANTEC Consulting Engineers prepared a Traffic Impact Analysis (TIA) in February 2020 (Appendix I) to assess transportation impacts associated with the Proposed Project. The scope of analysis conducted in the TIA is consistent with the City of Anaheim Criteria for Preparation of Traffic Impact Studies (City of Anaheim 2016b) and based on consultation with City Engineering staff. The TIA includes quantification of the trip generation and trip distribution associated with the Proposed Project, and the resulting impacts on existing weekday AM and PM peak hour intersection operations at five intersections and four roadway segments (see Figure 12, Study Area Intersections and Roadway Segments).

The Proposed Project would have one right in/right out driveway on Ball Road. According to the TIA, the Proposed Project would generate approximately six AM and six PM peak hour trips. For the purposes of the TIA, the analysis distributed trips generated by the Proposed Project to the surrounding street based on existing travel patterns derived from traffic counts. Figure 13, Project Trip Distribution, shows the AM and PM peak hour distribution of Project trips to the study intersections.

The TIA evaluated AM and PM peak hour intersection operations for the five intersections and four roadway segments under the following scenarios:

- Existing Conditions (2019)
- Existing Plus Project Conditions (2019)
- Opening Year (Existing + Approved Projects) (2021)
- Opening Year + Project (Existing + Approved Projects + Project) (2021)
- General Plan Buildout Base Conditions (2035)
- General Plan Buildout Conditions + Project (2035)



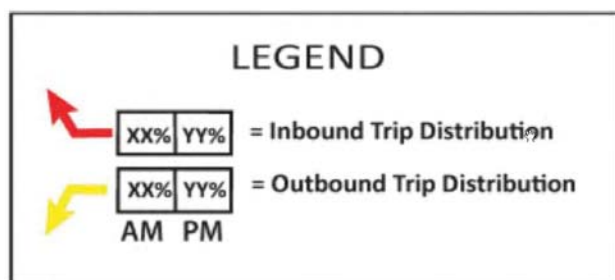
SOURCE: Advantec Consulting Engineers, 2020

FIGURE 12

Study Area Intersections and Roadway Segments

3175 West Ball Road

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SOURCE: Advantec Consulting Engineers, 2020

FIGURE 13
Project Trip Distribution
3175 West Ball Road

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Vehicle Miles Traveled Significance Thresholds

As noted previously, on June 23, 2020, the City adopted the Vehicle Miles Travelled Thresholds of Significance for purposes of analyzing transportation impacts and also approved the TIA Guidelines. Per the City's TIA Guidelines, certain projects that meet specific screening criteria are presumed to have a less than significant impact with respect to CEQA Section 15064.3 absent substantial evidence to the contrary (City of Anaheim 2020e). There are three project-screening types that lead agencies can apply to effectively screen projects from project-level assessment. A project only needs to fulfill one of the screening types below to qualify for screening. These screening types are summarized below¹²:

- **Type 1: Transit Priority Area Screening.** A Transit Priority Area is defined as a half-mile area around an existing major transit stop or an existing stop along a high-quality transit corridor. Projects located within a Transit Priority Area may be presumed to have a less than significant VMT impact absent substantial evidence to the contrary. This presumption may not be appropriate if the project has a total floor area ratio of less than 0.75, includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction, is inconsistent with the applicable Sustainable Communities Strategy, or replaces affordable residential units with a smaller number of moderate- or high-income residential units.
- **Type 2: Low VMT Area Screening.** A low VMT-generating area is an area that has a VMT per service population metric that is 15% below the County average. 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. Other employment-related and mixed-use projects within a low VMT-generating area may also be presumed to have a less than significant impact if the project can reasonably be expected to generate a VMT per service population metric similar to the existing land uses in the low VMT area.
- **Type 3: Project Type Screening.** Some project types are presumed to have a less than significant transportation impact absent substantial evidence to the contrary as their uses are local serving in nature. Projects that are presumed to have a less than significant impact due to their local serving nature include local-serving K-12 schools, neighborhood and community parks, day care centers, certain local-serving retail uses less than 50,000 square feet, student housing projects on or adjacent to college campuses, community and religious assembly uses, public services, local-serving community colleges, affordable or supportive housing, convalescent and rest homes, senior housing, and projects generating less than 110 daily vehicle trips.

Projects not screened through the steps above shall complete a VMT analysis and forecasting to determine if they would result in a significant VMT impact. VMT thresholds to determine potential VMT impacts are provided below.

- A project would result in a significant project-generated VMT impact if the baseline project-generated or cumulative project-generated VMT per service population exceeds 15% below the County of Orange baseline VMT per service population.
- The project's effect on VMT would be considered significant if the baseline or cumulative link-level boundary Citywide VMT per service population increases under the plus project condition compared to the no project condition.

¹² Note that this discussion provides a limited summary of the projects that may be screened from project-level assessment. For a full list of projects, definitions, and circumstances that preclude listed project types from being effectively screened, refer to the City's TIA Guidelines (City of Anaheim 2020e).

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

Less-than-Significant Impact. The Proposed Project would not conflict with an applicable plan, ordinance, or policy that establishes measures of effectiveness for the performance of the circulation system, as further discussed below.

The TIA analyzed five intersections and four roadway segments during weekday AM and PM peak hour conditions. The TIA determined that with the addition of the Proposed Project, there would be no significant impacts to the study intersections or roadway segments under Existing Conditions (2019), Opening Year (2021), and General Plan Buildout Base Conditions (2035). Under all conditions, the peak hour intersection operations did not exceed the standard acceptable threshold for intersection service level (LOS D). Thus, impacts to the circulation system would be less than significant.

The General Plan includes policies that provide for an integrated network of bicycle and pedestrian facilities, as well as for the needs of transit users. The General Plan calls for the construction and enhancement of a bike route network to encourage non-motorized transport between neighborhoods and between neighborhoods, in addition to key destinations for commute, recreational, and other purposes (Goals 2.2, 3.1, 7.1, and 8.1). Additionally, the City of Anaheim Bicycle Master Plan (City of Anaheim 2017) includes a map of existing and planned bikeways throughout the City. According Bicycle Master Plan, the City plans to implement a Class II bike lane on Ball Road from Western Avenue to Gramont Street. An existing Class II bike lane is located on Western Avenue fronting the Project Site. Pedestrian sidewalks are located along Ball Road and Western Avenue. Additionally, an existing Orange County Transportation Authority bus stop is located within the public right-of-way/sidewalk on Ball Road, along the Project Site's frontage.

The Proposed Project would involve modifications to the public right-of-way within Western Avenue and Ball Road. The Proposed Project would involve modifications to the pedestrian sidewalks, including the bus stop. The Proposed Project would construct final sidewalks pursuant to City Standards. Modifications to the bus stop would be coordinated with the City and with the Orange County Transportation Authority. Additionally, the Proposed Project would not include components that would preclude the City from constructing a Class II bicycle lane along Ball Road. Implementation of the Proposed Project would not conflict with existing circulation facilities, including transit, roadway, bicycle, or pedestrian facilities. Therefore, impacts associated with programs, plans, ordinances, or policies addressing the circulation system 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. According to Attachment B of the TIA Guidelines, the Proposed Project is located with a census tract that has an average VMT per service population metric that is more than 15% below the countywide average. Per TIA Guidelines, residential 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 TIA Guidelines states that this presumption would apply if following is true:

- The project is composed of similar land types and of a similar density to the land uses within that zone
- The project is assumed to generate VMT per service population that is similar to those existing uses.

The Proposed Project is a multi-story, multi-family residential development. The proposed use is similar to adjacent properties, particularly on Ball Road. Since the Proposed Project is similar to the surrounding multi-family properties, it is assumed to generate VMT per service population metric that is similar to the surrounding properties. Therefore, the Project could be screened from a VMT analysis, and would result in a less than significant impact with regard to CEQA Section 15064.3, per the City's TIA Guidelines.

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

Less-than-Significant Impact. The Project Applicant would be responsible the construction of the Proposed Project's driveway as well as the Proposed Project's frontage improvements (pedestrian facilities, utility connections, landscape areas) adjacent to Ball Road and Western Avenue. The Project Site would be accessible via a 25-foot right-in/right-out driveway located at the southwestern corner of the Project Site on Ball Road. The Proposed Project's driveway would be in proximity to the intersection of Ball Road and Western Avenue. Given the limited space between the Proposed Project's driveway and the intersection of Ball Road and Western Avenue, vehicles exiting the Project Site will not be permitted to cross Ball Road to access eastbound lanes of Ball Road. As such, the Proposed Project would include the installation of signage at this driveway to indicate clearly to vehicles exiting the Project Site that only right turns are permitted. The Project Applicant would design these on-site and adjacent improvements in accordance with all applicable design standards set forth by the City, which it established to ensure safe and efficient vehicular circulation on City roadway facilities. In addition, the City reviews all site plans to ensure that adequate line-of-sight is provided at all driveways, making sure that no structures or landscaping block the views of vehicles entering and exiting a site. As such, the Proposed Project would not introduce any sharp curves, dangerous intersections, or incompatible uses. Therefore, impacts associated with hazardous design features or incompatible land uses would be less than significant.

- d) ***Would the project result in inadequate emergency access?***

No Impact. The Project Site would be accessible via a 25-foot right-in/right-out driveway located at the southwestern corner of the Project Site on Ball Road. The Proposed Project's driveway would be designed and constructed to City standards and comply with City width, clearance, and turning-radius requirements. The Project Site would be accessible to emergency responders during construction and operation of the Proposed Project. Additionally, the Proposed Project would not involve any components that could potentially interfere with use of Ball Road or Western Avenue by emergency vehicles. Because the Proposed Project would comply with all applicable local requirements related to emergency vehicle access and circulation, the Proposed Project would not result in inadequate emergency access. Therefore, no impacts associated with inadequate emergency access would occur.

3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less-Than- Significant Impact With Mitigation Incorporated	Less-Than- Significant Impact	No Impact
XVIII. 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:				
a) 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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The basis for the following analysis is a Cultural Resources Report prepared for the Project Site in May 2019 by Dudek (Appendix C). As part of Cultural Resources Report, recent photographs of the Project Site, historic maps, aerial photographs, a California Historical Resources Information System records search conducted at the South Central Coast Information Center, a Native American Heritage Commission Sacred Lands File search, informal tribal consultation, and an intensive pedestrian survey were conducted.

Additionally, the City conducted tribal consultation in accordance with AB 52 and SB 18. Correspondence between the City and the Native American Tribes is provided in Appendix J, Tribal Cultural Resources Consultation Correspondence).

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

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

Less-than-Significant Impact. As discussed in Section 3.5, the Project Site has been subject to previous development, demolition activities, and excavation activities, and the Project Site is not eligible or listed in the CRHR or local register of historical resources (California Public Resources

Code Section 21074) (Appendix C). Implementation of the Proposed Project would not result in any substantial adverse change in a tribal cultural resource (TCR) defined pursuant to California Public Resources Code Section 5024.1 or California Public Resources Code Section 5020.1(k). Impacts would be less than significant.

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

Less-than-Significant with Mitigation Incorporated. There are no known TCRs within the boundaries of the Project Site. The Project Site has been subject to previous development, demolition activities, and excavation activities, and does not meet any of the historical resources criteria outlined in the California Public Resources Code Section 2024.1.

In considering the significance of the resource to a California Native American tribe, the City contacted the NAHC for the listing of tribes with traditional lands or cultural places located within the boundaries of the Project Site and to search the Sacred Lands File (SLF). The SLF search result was negative. The City contacted the tribes per the NAHC listing, and only one tribal representative responded—Andrew Salas of Gabrieleño Band of Mission Indians - Kizh Nation.

The Gabrieleño Band of Mission Indians - Kizh Nation considers the Project Site to be within its ancestral tribal territory, descending from a higher degree of kinship than traditional or cultural affiliation. They also indicated that the Project Site is in a sensitive area and may cause a substantial adverse change in the significance of their TCRs. For this reason, they recommended a tribal monitor(s) be present during ground-disturbing activities. Upon discovery, if the finds are determined to be Native American, the coroner will notify the NAHC as mandated by state law who will then appoint a Most Likely Descendent. The Gabrieleno Band of Mission Indians - Kizh Nation indicated that to the tribe, the term “human remains” encompasses more than human bones, but also the burial of funerary objects with the deceased, and the ceremonial burning of human remains. These remains are to be treated in the same manner as human bones that remain intact. Associated funerary objects are objects that are reasonably believed to have been placed with individual human remains either at the time of death or later as part of the death rite or ceremony of a culture. Other items made exclusively for burial purposes or to contain human remains can also be considered associated funerary objects. Because there is a possibility that grading and excavation activities during implementation of the Proposed Project could impact previously undisturbed TCRs, MM-TCR-1 shall be required to reduce this potential impact to a less than significant level.

MM-TCR-1 Prior to the commencement of any grading and/or construction activity, the property owner/developer shall retain a Native American Monitor and a copy of the executed contract shall be submitted to the City of Anaheim Planning and Building Department. The Tribal monitor will only be present on-site during the construction phases that involve ground-disturbing activities. Ground disturbing activities are defined by the Gabrieleño Band of Mission Indians-Kizh Nation as activities that

may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the Project area. The Tribal Monitor will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the Project Site grading and excavation activities are completed, or when the Tribal Representatives and monitor have indicated that the Project Site has a low potential for impacting Tribal Cultural Resources.

Upon discovery of any archaeological resources, construction activities shall cease in the immediate vicinity of the find until the find can be assessed. All archaeological resources unearthed by project construction activities shall be evaluated by the qualified archaeologist and Tribal monitor approved by the Gabrieleño Band of Mission Indians-Kizh Nation. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the property owner/developer regarding treatment and curation of these resources. Typically, the Tribe will request reburial or preservation for educational purposes. Work may continue on other parts of the Project Site while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5[f]). If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and California Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.

3.19 Utilities and Service Systems

	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Less-than-Significant Impact. The Proposed Project would extend utility service lines, from their existing locations adjacent to the Project Site, onto the Project Site. These utility lines include water, wastewater, stormwater drainage, electric power, natural gas, and telecommunications services. Given that the activity of connecting utilities from their current locations onto the Project Site require ground disturbance and the use of heavy machinery associated with trenching, the connection of these utility services to the Proposed Project could potentially result in environmental effects. However, the extension of these utility lines is part of the Proposed Project analyzed herein. As such, this IS/MND has already accounted for any potential environmental impacts related to these components of the Proposed Project as part of the impact assessment conducted for the entirety of the Proposed Project. No adverse physical effects beyond those already disclosed in this IS/MND would occur because of implementation of the Proposed Project's utility

system connections. Additionally, the Proposed Project would constitute a nominal increase in utility usage beyond what has already been accounted for in growth projections for the City (i.e., the utility usage associated with use of the Project Site for multi-family uses would be a nominal increase compared to the utility usage associated with use of the Project Site for commercial uses, especially given the size of the Project Site at 0.36 acre), and by each utility provider. No modifications to utility infrastructure would be necessary outside of the Project Site. As such, impacts associated with the construction or expansion of utility line connections would be less than significant.

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

Less-than-Significant Impact. According to the City's 2015 Urban Water Management Plan (City of Anaheim 2016a), the City depends on a combination of imported water, local groundwater, and recycled water to meet its water needs. The City works together with two primary agencies, Metropolitan and OCWD to ensure a safe and reliable water supply that will continue to serve the community in periods of drought and shortage. The sources of imported water supplies include the Colorado River and the State Water Project provided by Metropolitan.

The City's main source of water supply is groundwater from the Basin. Currently, the City relies on approximately 70% groundwater and 30% imported water. The City's Urban Water Management Plan anticipates the same water supply mix to be available to the City through 2040. Table 23 provides the City's projected water demand and supplies for the single- and multiple-year dry year scenario.

Table 23. Multiple Dry Years Supply and Demand Comparison (AF)

Dry Year Scenario	Supply and Demand	2020	2025	2030	2035	2040
First Year	Supply totals	65,774	70,605	71,089	71,070	71,172
	Demand totals	65,774	70,605	71,089	71,070	71,172
	Difference	0	0	0	0	0
Second Year	Supply totals	65,774	70,605	71,089	71,070	71,172
	Demand totals	65,774	70,605	71,089	71,070	71,172
	Difference	0	0	0	0	0
Third Year	Supply totals	65,774	70,605	71,089	71,070	71,172
	Demand totals	65,774	70,605	71,089	71,070	71,172
	Difference	0	0	0	0	0

Source: City of Anaheim 2016a.

Every urban water supplier is required to assess the reliability of their water service to its customers under normal, dry, and multiple dry water years. The City depends on a combination of imported and local supplies to meet its water demands. The City has taken numerous steps to ensure it has adequate

supplies. Various factors may affect the reliability of supplies such as legal, environmental, water quality, and climatic. With the projects and programs implemented by Metropolitan, OCWD, and the City, these agencies are projected to have water supplies to meet full-service demands. Metropolitan's 2015 UWMP found that they would be able to meet full-service demands of its member agencies from 2020 through 2040 during normal, single dry, and multiple dry years (City of Anaheim 2016a).

As discussed, the City's water demands can be met under multiple dry years and supply is expected to meet projected demand due to diversified supply and conservation measures. As such, although use of the Project Site for multi-family uses would result in a slight increase in water demand when compared to the anticipated use of the Project Site for commercial uses (as was anticipated in the City's Urban Water Management Plan), any increase would be nominal, especially given the size of the Project Site at 0.36 acre. Given the nominal nature of this deviation, the City's projected current and future supplies would be able to serve the Proposed Project. Therefore, impacts associated with water facilities and supplies would be less than significant.

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

Less-than-Significant Impact. The Orange County Sanitation District Reclamation Plant No. 1, located in the City of Fountain Valley, and Reclamation Plant No. 2, located in the City of Huntington Beach would receive wastewater transported via trunk sewers, generated from the Project area. The effluent discharge to the ocean is a blend of advanced primary and secondary treated wastewater, as specified in the OCSD's NPDES permit. Both of these reclamation plants are required to comply with the treatment requirements specified in the NPDES permits issued by SARWQCB.

Reclamation Plant No. 1 currently has a design capacity of 144 million gallons per day (mgd), and Reclamation Plant No. 2 has a design capacity of 108 mgd (City of Anaheim 2004). Although these treatment capacities would expand in the future, these existing design capacities would be sufficient to serve the Project. For the 2019–2020 fiscal year, average wastewater flows at Reclamation Plant No. 1 were 119 mgd, while flows at Reclamation Plant No. 2 were 70 mgd, totaling 189 mgd (OCSD 2020). Thus, under their current design capacities, Reclamation Plant Nos. 1 and 2 have a collectively surplus treatment capacity of approximately 71 mgd.

The Project does not include industrial uses or activities that would require unique wastewater treatment processes and the Project would generate the same types of municipal wastewater currently generated throughout the City. Additionally, the Project's wastewater generation would represent only a nominal fraction of this present surplus treatment capacity, and because Reclamation Plant Nos. 1 and 2 are required to adhere to the treatment requirements specified in the NPDES permits issued by SARWQCB, wastewater produced by the Project and requiring treatment would comply with SARWQCB's treatment requirements. Therefore, impacts associated with wastewater treatment requirement would be less than significant.

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

Less-than-Significant Impact. The City contracts with a franchised hauler to transport its solid waste to material recovery facilities located in various parts of the City. However, the Olinda Alpha Landfill, near the City of Brea primarily intakes remaining waste, produced by the City. Additionally, the Frank R. Bowerman Landfill near the City of Irvine and the Prima Deshecha Landfill near the City of San Juan Capistrano receives refuse, generated from the City. Lastly, trash trucks may need to transport material to one or the other, to ensure that the trucks do not exceed the maximum permitted daily tonnage at a particular landfill.

The California Department of Resources Recycling and Recovery publishes solid waste generation rates based on land use types. According to the California Department of Resources Recycling and Recovery, multifamily residential uses can generate solid waste at a rate of approximately 12.231 pounds per dwelling unit per day (CalRecycle 2020a). Based on these generation rates, the project's 11 residential units could generate solid waste at a rate of approximately 134.5 pounds per day.¹³

Olinda Alpha Landfill has a permitted maximum daily throughput of 8,000 tons (CalRecycle 2020b), the Frank R. Bowerman Landfill has a permitted maximum daily throughput of 11,500 tons (CalRecycle 2020c), and the Prima Deshecha Landfill has a permitted maximum daily throughput of 4,000 tons (CalRecycle 2020d). As such, even when considering the impending closure of the Olinda Alpha Landfill in or around 2021, solid waste generated by the Project would represent a nominal percentage of the collective maximum daily throughput permitted for the local landfills. Therefore, impacts associated with solid waste disposal would be less than significant.

- e) ***Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?***

Less-than-Significant Impact with Mitigation Incorporated. Under AB 939, the Integrated Waste Management Act of 1989, the City is required to develop source reduction, reuse, recycling, and composting programs to reduce the amount of solid waste entering landfills. AB 939 mandates local jurisdictions to divert at least 50% of their solid waste generation into recycling. To ensure the Proposed Project complies with the requirements of AB 939, MM-UTL-1 requires the property owner/developer to submit Project plans to the Public Works Department, Streets and Sanitation Division, for review and approval to ensure that the plans comply with AB 939, as well as the County of Orange and City of Anaheim Integrated Waste Management Plans as administered by the City of Anaheim to the maximum extent feasible. Therefore, with implementation of MM-UTL-1, impacts associated with solid waste disposal regulations would be less than significant.

MM-UTL-1 Prior to the final building and zoning inspections of each development, the property owner/developer shall submit Project plans and a Solid Waste Management Plan to the Streets and Sanitation Division of the Public Works Department for review and approval to ensure that the plans comply with AB 939, and the Solid Waste Reduction Act of 1989, and the County of Orange and City of Anaheim Integrated Waste Management Plans as administered by the City of Anaheim to the maximum extent feasible, which shall be

¹³ Note that this estimate does not account for diversion of recyclables from the solid waste stream, and thus, should be considered a conservative projection.

determined by the Streets and Sanitation Division. Implementation of said plans shall commence upon occupancy and shall remain in full effect as required by the Street and Sanitation Division and may include, at its discretion, the following plan components:

- Detailing the locations and design of on-site recycling facilities.
- Participating in the City of Anaheim's "Recycle Anaheim" program or other substitute program as may be developed by the City or governing agency.

3.20 Wildfire

	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
XX. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

No Impact. The Project site is not located within a Fire Hazard Severity Zone or a Very High Fire Hazard Severity Zone according to the Local Responsibility and State Responsibility Area maps by the California Department of Forestry and Fire Protection (CAL FIRE) (CAL FIRE 2011a-b). In addition, the Project site is located within a developed portion of the City. As discussed in Section 3.9, Hazards and Hazardous Materials, the Proposed Project would not significantly affect emergency response or evaluation activities and the Project would not conflict with or impair implementation of an emergency evacuation plan. As such, the Project would not expose

people or structures to significant risk involving wildland fires, exacerbate wildfire risks, or otherwise result in wildfire-related impacts. Therefore, no impacts associated with wildfire would.

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

No Impact. The Project site is not located within a Fire Hazard Severity Zone or a Very High Fire Hazard Severity Zone according to the Local Responsibility and State Responsibility Area maps by CAL FIRE (CAL FIRE 2011a-b). In addition, the Project site is located within a developed portion of the City. Further, the Project site contains only limited amounts of ruderal vegetation and does not contain extensive amounts of vegetation or wildland fuel. Therefore, it is not anticipated that the Proposed Project, due to slope, prevailing winds, and other factors, would exacerbate wildfire risks or expose future occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Thus, the Proposed Project would not expose people or structures to significant risk involving wildland fires, exacerbate wildfire risks, or otherwise result in wildfire-related impacts. Therefore, no impacts associated with wildfire would occur.

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

No Impact. The Project site is not located within a Fire Hazard Severity Zone or a Very High Fire Hazard Severity Zone according to the Local Responsibility and State Responsibility Area maps by CAL FIRE (CAL FIRE 2011a-b). The Project Site is located within a developed portion of the City and the Proposed Project would connect to existing utilities around the Project Site. The Proposed Project would not require installation or maintenance of other associated infrastructure such as fuel breaks, power lines, or other utilities that would exacerbate fire risk. As such, the Proposed Project would not expose people or structures to significant risk involving wildland fires, exacerbate wildfire risks, or otherwise result in wildfire-related impacts. Therefore, no impacts associated with wildfire would occur.

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

No Impact. The Project site is not located within a Fire Hazard Severity Zone or a Very High Fire Hazard Severity Zone according to the Local Responsibility and State Responsibility Area maps by CAL FIRE (CAL FIRE 2011a-b). As discussed in Section 3.8, Geology and Soils, and Section 3.10, Hydrology and Water Quality, the Proposed Project would not result in significant risks associated with flooding, landslides, runoff, or drainage changes, and the Proposed Project does not propose the use of fire (such as for a controlled vegetation burn) that would result in post-fire slope instability. Further, the Project Site is located within a developed portion of the City that is not susceptible to wildland fires, given its considerable distance from open, natural areas. Thus, the Project would not expose people or structures to significant risk involving wildland fires, exacerbate wildfire risks, or otherwise result in wildfire-related impacts. Therefore, no impacts associated with wildfire would occur.

3.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less-Than-Significant Impact With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
XXI. 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- 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 Impact With Mitigation Incorporated. As discussed in Section 3.4, Biological Resources; Section 3.5, Cultural Resources, and Section 3.18, Tribal Cultural Resources, with the incorporation of mitigation (MM-BIO-1, MM-CUL-1, and TCR-1, to minimize potential impacts related to biological resources, cultural resources, and tribal cultural resources, the Proposed Project would not result in impacts to tribal cultural resources. Therefore, the Proposed Project would not 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, 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)?***

Less-than-Significant Impact With Mitigation Incorporated. As addressed throughout this IS/MND, the Proposed Project would have no impact, a less-than-significant impact, or a less-than-significant impact with mitigation incorporated with respect to all environmental impact areas. Cumulative impacts of several resource areas have already been addressed in individual resource sections, Section 3.13, Noise; and Section 3.17, Transportation. CalEEMod was used to assess the air quality and GHG emissions impacts resulting from the Proposed Project, concluding less-than-significant impacts. Noise and traffic assessments conducted as part of this IS/MND considered cumulative increases in traffic and concluded that cumulative impacts would be less than significant. Some of the other resource areas (i.e., Section 3.1, Aesthetics; Section 3.2, Agricultural and Forestry Resources; Section 3.6, Energy, Section 3.10, Hydrology and Water Quality; Section 3.11, Land Use and Planning; Section 3.12, Mineral Resources; Section 3.14, Population and Housing; Section 3.15, Public Services; Section 3.16, Recreation; and Section 3.20, Wildfire) were determined to have a less-than-significant or no impact compared to existing conditions, and thus, the Proposed Project would not contribute to cumulative impacts related to these environmental topics. Other issues areas (i.e., Section 3.5, Cultural Resources; Section 3.7, Geology and Soils; Section 3.9, Hazards and Hazardous Materials, and Section 3.18, Tribal Cultural Resources) are by their nature site-specific, and impacts at one location do not add to impacts at other locations or create additive impacts.

For all resource areas analyzed, with the incorporation of feasible mitigation measures (MM-BIO-1, MM-CUL-1, MM-GEO-1, MM-HAZ-1, MM-HAZ-2, MM-NOI-1 through MM-NOI-3, MM-TRC-1, and MM-UTL-1) identified within this IS/MND (see Section 3.4, Biological Resources; Section 3.5, Cultural Resources; Section 3.7, Geology and Soils; Section 3.9, Hazards and Hazardous Materials; Section 3.13, Noise; Section 3.18, Tribal Cultural Resources; and Section 3.19 Utilities and Service Systems), the Proposed Project’s individual-level impacts would be reduced to less-than-significant levels, which would, in turn, reduce the potential for these impacts to be considered part of any possible cumulative impact. Therefore, the Proposed Project would not result in individually limited but cumulatively considerable impacts.

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

Less-than-Significant Impact With Mitigation Incorporated. As evaluated throughout this document, with incorporation of mitigation (MM-BIO-1, MM-CUL-1, MM-GEO-1, MM-HAZ-1, MM-HAZ-2, MM-NOI-1 through MM-NOI-3, MM-TRC-1, and MM-UTL-1), environmental impacts associated with Proposed Project would be reduced to less-than-significant levels. Thus, the Proposed Project would not directly or indirectly cause substantial adverse effects on human beings.

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