

**Draft Initial Study
WESTERN HIGH SCHOOL PRACTICE FIELD
PROJECT
Anaheim, CA
(Orange County)**

Prepared for:

ANAHEIM UNION HIGH SCHOOL DISTRICT
Facilities Planning – Design – Construction
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SECTION 1.0 – PROJECT DESCRIPTION AND ENVIRONMENTAL SETTING

1.1 PROJECT PURPOSE

Western High School is currently experiencing deteriorating campus building and athletic facilities. Anaheim Union High School District (District) proposes to improve athletic facilities by providing an artificial turf field facility with bleacher seating (Project). Measure H funds were approved through a bond measure in 2014, and the District outlined the actions considered through the Blueprint for the Future document. The Blueprint Committee comprises students, parents, staff, and community members. Key topics for the Blueprint for the Future include Student Learning; Technology for the Future; Safety and Security; Accountability and Finance; Energy Conservation and Sustainability; and Facilities, Fields, and Outdoor Areas.

1.2 PROJECT BACKGROUND

The District serves a student population of approximately 28,000 students in 19 public schools and is considered one of the largest school districts in California.

Western High School was built in the mid-1950s, with additions and/or renovations occurring in 1957, 1973, and 1993. Portable classroom buildings were installed in 2010. The school is located at 501 S. Western Avenue, Anaheim, CA 92804 and is situated in a residential area surrounded by housing on all sides and places of worship to the south. The school accommodates students from grades 9 through 12. The site is approximately 39 acres in size and encompasses 11 permanent buildings and 13 relocatable/portable buildings.

1.3 PROJECT LOCATION AND SITE CHARACTERISTICS

1.3.1 Location

Western High School is located on a 39-acre property comprising 11 permanent buildings and 13 portable buildings. Handel Stadium, which is used for District-wide events, is located at the northwestern portion of the campus and is not a part of this Project. The football/soccer field is located on the southern portion of campus, north of Orange Avenue and the existing parking lot.

1.3.2 General Plan Designation/Zoning

The Project site is designated as School within the General Plan. Additionally, the Project size is zoned Transitional, which includes land for agricultural uses in a transitory or interim use, or is restricted to limited uses because of special conditions, or not zoned to one of the zoning districts (City 2021a; City 2021b).

1.3.3 Surrounding Land Uses and Project Setting

Land uses and zoning designations surrounding the Proposed Project are provided below in Table 1. The Project site is located in the western portion of the City of Anaheim, and bound by Western Avenue and W. Orange Avenue.

There is an existing joint-use agreement with the City regarding field use where the fields could be rented out for private groups when they are not being used by the school.

Table 1. Surrounding Land Use and Zoning

Direction	Land Use	Zoning
North	Medium Density Residential	Multiple Family Residential (RM-4)
East	Low Density Residential	Single-Family Residential (RS-2)
South	Low and Medium Density Residential	Single-Family Residential (RS-2) and Multiple Family Residential (RM-4)
West	Low Density Residential	Single-Family Residential (RS-2)

1.4 PROJECT DESCRIPTION

The Proposed Project will consist of the following upgrades:

- Construction of a fenced-in artificial turf field within the existing school's athletic fields
- Construction of an observational press box/band tower
- Addition of metal shade structures with lighting, cameras, and Wi-Fi
- Installation of tiered bleachers under the metal shade structures
- Addition of four field lights
- Addition of scoreboard
- Construction of a modular concession building with restroom facilities
- Installation of an entry canopy, marquee, and fencing
- Provision of landscaping and access improvements
- High netting
- Flagpole
- Storm- and rainwater retention system
- Drinking fountains

1.4.1 Project Schedule

The Proposed Project is expected to occur over a 12-month period, between the first quarter of 2023 and the first quarter of 2024, approximately. Construction activities will take place between the hours of 7:00 a.m. to 4:00 p.m. Monday through Friday and 8:00 a.m. to 5:00 p.m. Saturday.

Construction Activities

Once the LLB contractor selection of the Proposed Project has been approved by the District's Board of Trustees, project construction activities will begin in the first quarter of 2023. The construction would begin after Division of the State Architect approval of plans and specifications is obtained and the contract for construction is awarded.

Construction equipment to be used during construction of the Proposed Project upgrades include the following items:

- Loaders
- Pickup trucks
- Backhoe
- Water truck
- Asphalt roller

- Excavators
- Grader
- Scraper
- Roller
- Paving machine
- Skidsteer
- Reachfork
- Drill rig
- Utility truck
- Crew truck
- Dump truck and transfer trailer

Demolition and Excavation

The existing natural turf field will be excavated for the installation of the artificial turf.

Staging Areas

Construction trailers and staging areas will be located in the southern portion of the student parking lot along Orange Avenue.

1.4.2 Best Management Practices

During construction activities, the following Best Management Practices (BMPs) will be implemented:

BMP-1: Nesting Bird Survey

If tree or vegetation removal is to occur between February 1 and September 15, the contractor or District shall retain a qualified biologist to conduct a survey to identify active bird nests no more than two weeks before the start of construction. Removal of any mature trees with active bird nests will be delayed until a qualified biologist determines that the subject bird(s) are no longer nesting or until juveniles have fledged.

A nesting bird preconstruction survey will be conducted by a qualified biologist and submitted to the District three days prior to demolition and/or vegetation removal activities during nesting bird season (February 15 through August 31) within 250 feet of the Project site for passerines and 500 feet for raptors and/or listed species, where feasible. Should nesting birds be found, an exclusionary buffer will be established by a qualified biologist. The buffer may be up to 500 feet in diameter depending on the species of nesting bird found. This buffer will be clearly marked in the field by construction personnel under guidance of the qualified biologist, and construction or clearing will not be conducted within this zone until the qualified biologist determines that the young have fledged or the nest is no longer active. Nesting bird habitat within the Project site will be resurveyed during bird breeding season if a lapse in construction activities lasts longer than seven days.

BMP-2: Cultural Resource

The District will require that the construction contractor, in the event a cultural resource (i.e., historic or prehistoric artifact, fossilized shell, or bone) is discovered during ground-disturbing activities, stop all work within the immediate area and notify the District, and that the find be evaluated by a qualified

archaeologist. If the find is determined to be potentially significant, the archaeologist, in consultation with the District and contractor, will develop a treatment plan. All work in the immediate vicinity of the unanticipated discovery will cease until the qualified archaeologist has evaluated the discovery or the treatment plan has been implemented.

BMP-3: Human Remains

If human remains or funerary objects are unearthed during any activities associated with the Project, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur within a 100-foot buffer of the find until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98.

If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC), or any Tribes known to have history in the region. The NAHC will then contact the deceased Native American's most likely descendant, who will then serve as consultant on how to proceed with the remains (i.e., avoid, reburial).

BMP-4: Air Quality Emissions

All off-road diesel-powered equipment (non-street legal) greater than 50 horsepower used on-site during construction of the project shall meet United States Environmental Protection Agency (EPA) Tier 4 off-road emission standards. If substantial evidence is provided by the permittee or its contractor that such equipment is not commercially available, then Tier 3 equipment may be utilized.

Commercial on-road and off-road diesel vehicles are subject to the idling limits of California Code of Regulations Title 13, Sections 2485 and 2449(d)(3), respectively. Construction equipment shall not idle for more than five consecutive minutes. The idling limit does not apply to: (1) idling when queuing beyond 100 feet from any restricted areas; (2) idling to verify that the vehicle is in safe operating condition; (3) idling for testing, servicing, repairing, or diagnostic purposes; (4) idling necessary to provide a power source for equipment or operations; to accomplish work for which the vehicle was designed (such as operating a crane); and (5) idling necessary to ensure safe operation of the vehicle.

Idling Equipment engines should be maintained in good condition and in proper tune, as per manufacturer's specifications.

BMP-5: Noise Ordinance

Per the Code of Ordinances of Orange County, Division 6 – Noise Control, noise sources associated with construction, repair, remodeling, or grading of any property shall not take place between the hours of 8:00 p.m. and 7:00 a.m. on weekdays, including Saturday, or at any time Sunday or a federal holiday. Noise sources associated with the maintenance of property shall take place between 7:00 a.m. and 8:00 p.m. on any day except Sunday or a federal holiday, or between the hours of 9:00 a.m. and 8:00 p.m. on Sunday or a federal holiday.

BMP-6: Fugitive Dust

During clearing, grading, and earthmoving, excessive fugitive dust emissions shall be controlled by regular watering and other dust preventive measures, including but not limited to the following:

- Materials excavated or graded shall be sufficiently watered to prevent excessive amounts of dust at least twice daily with complete coverage, preferably late morning and after work is completed for the day.
- Exposed soil areas and graded materials shall be treated to prevent fugitive dust. This may include watering, applying environmentally safe soil-stabilization materials, and/or roll-compaction as appropriate.
- Clearing, grading, and other earthmoving activities shall cease during periods of high winds (i.e., greater than 20 miles per hour averaged over one hour) to prevent excessive amounts of dust.
- Materials being transported off-site shall be either watered or securely covered to prevent excessive dust.

BMP-7: Site Runoff and Erosion

The Proposed Project shall implement site-specific BMPs under the guidelines of the Stormwater Pollution Prevention Plan (SWPPP) to address site runoff and erosion. Measures will include but are not limited to site watering, covering soil in inactive areas, placing gravels and fiber rolls to divert runoff, temporary sediment control fences to divert or create barriers to surface flows, or inlet inserts to trap/filter construction and stormwater flows leaving the site.

1.5 REQUIRED PERMITS AND APPROVALS

A public agency, other than the Lead Agency, that has discretionary approval power over a project is referred to under the *CEQA Guidelines* as a “Responsible Agency.” The Responsible Agencies and their corresponding approvals for this Proposed Project include:

State Agencies

- School Facilities Planning Division (Plan Approval)
- Office of Public School Construction (Approval of Funding)
- Division of the State Architect (Approval of Structural Fire, Life & Safety, and Access Compliance)

Regional Agencies

- Orange County Fire Department (Approval of Site Plan for Emergency Access)

Figure 1: Project Vicinity Map



Figure 2: Project Location Map

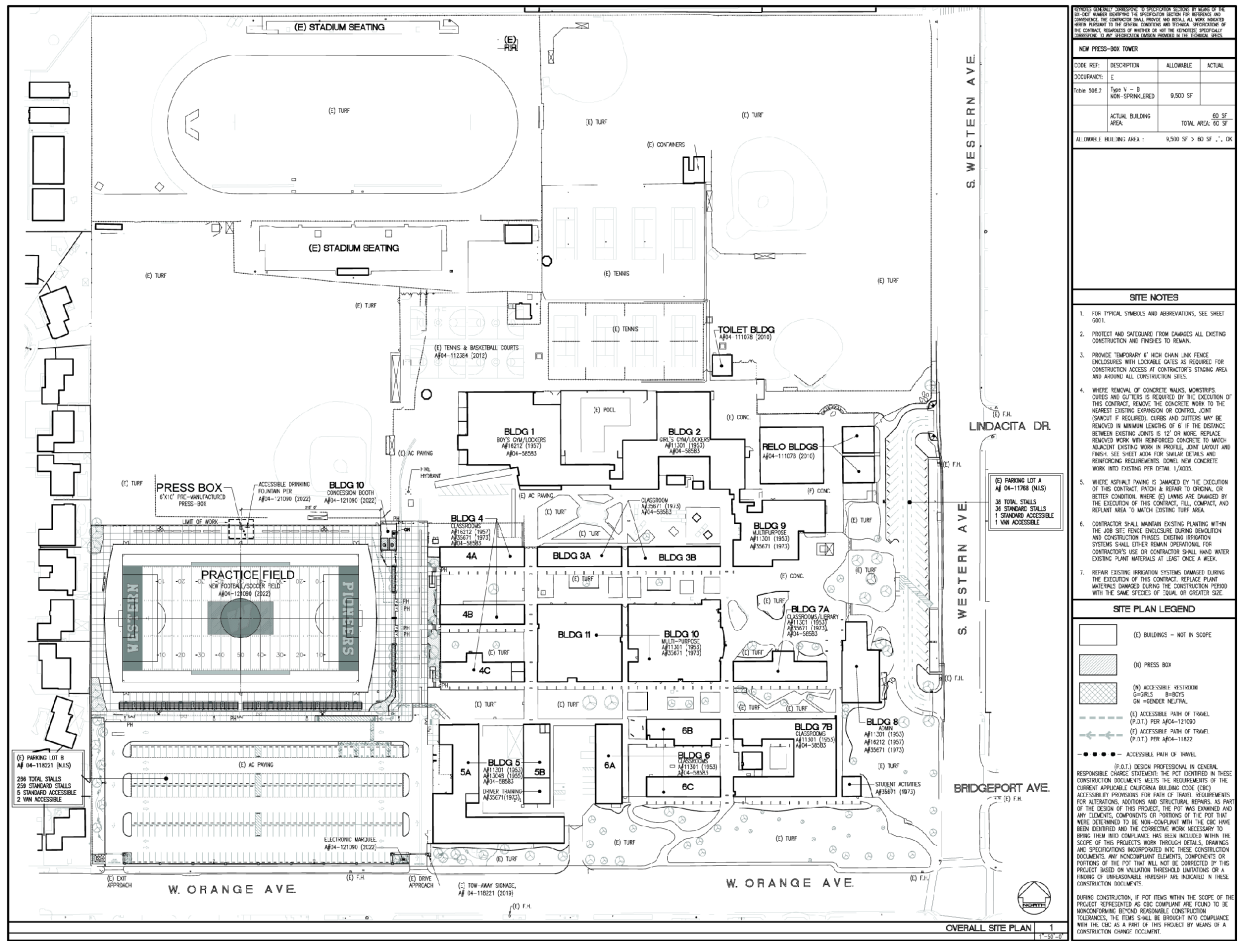


Figure 2
Western HS Stadium CEQA
Site Plan

SECTION 2.0 – ENVIRONMENTAL DETERMINATION

2.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would potentially be affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklists on the following pages. For each of the potentially affected factors, mitigation measures are recommended that would reduce the impacts to less than significant levels.

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

2.2 DETERMINATION

On the basis of this initial evaluation:

1. I find that the project **could not** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared. ☐
2. I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared. ☐
3. I find the proposed project **may have a significant effect** on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required. ☐
4. 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. ☐
5. I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or Negative Declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or Negative Declaration, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required. ☐

Signature

Date

Name

Title

SECTION 3.0 – 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. 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 offsite as well as onsite, 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 substantial evidence exists that an effect may be significant. If one or more “Potentially Significant Impact” entries are marked when the determination is made, an 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 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. 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 significant.

*Note: Instructions may be omitted from final document.

SECTION 4.0 – CHECKLIST OF ENVIRONMENTAL ISSUES

4.1 AESTHETICS

1.	AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 checked="" type="checkbox"/>	<input 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"/>

4.1.1 Impact Analysis

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

No Impact. The Proposed Project site is bounded by multifamily developments to the north, South Western Avenue to the east, Orange Avenue to the south, and single-family residential and Danbrook Elementary School to the west. Scenic views from the Project site may include the San Gabriel Mountains to the north and the Saddleback Mountains to the east. No scenic vistas would be obstructed by the Proposed Project. The City of Anaheim identifies the area east of State Route 55 and State Route 91, west of the Orange County Line, south of the Santa Fe Railroad right-of-way, and north of the present south city limits as part of its Scenic Corridor; however, the Proposed Project is not located within this zone (City 2022). The Project would involve the demolition of the existing football and soccer field and an installation of a new synthetic turf field. The addition of the press box tower would create a new feature that would be a maximum height of 33'10". The press box tower would be located toward the interior of the school, and no impact would occur to nearby residents. There would be no impact to scenic vistas.

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

Less Than Significant Impact. The Project site is approximately 2.2 miles south of California State Highway 91, a portion of which is officially designated as a State scenic highway. The section nearest to the Project site that is designated as a State scenic highway is located 10 miles east of the Project site (Caltrans 2022). Additional nearby highways include Interstate 5 and California State Highway 22, neither of which have scenic highway designations near the Project site. No rock outcroppings, historic buildings, or trees would be impacted by the Proposed Project. The Proposed Project would, therefore, have a less than significant impact.

- c) *Would the project, 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?*

Less Than Significant Impact. The Proposed Project includes the demolition of the existing field; the installation of a new all-weather field and bleachers; and other associated improvements. These changes would result in changes to the overall visual character and create new structures that were not previously part of the existing school. The Project would be consistent with the character of the surrounding structures, with the press box tower reaching a height of 33'10" and existing gymnasiums having an approximate height of 40 feet. The improved installations would not degrade the existing visual character or quality of the site or its immediate surroundings. The Proposed Project would also be consistent with zoning regulations. Impacts would be less than significant.

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

Less Than Significant Impact. The Proposed Project would not substantially increase lighting in the surrounding area relative to existing levels. Currently, no lighting is present on the existing field, with lighting sources coming from the existing stadium and baseball field. The Proposed Project site is in an urbanized area surrounded by residential neighborhoods. The Proposed Project would install a new field and bleachers in place of the existing field, thereby introducing four new light poles.

Musco Lighting prepared illumination summaries for the Proposed Project to calculate the illuminance, the energy of light hitting the surface of an area, of the proposed operations of the Project (Appendix A). The summaries provided the measurements for horizontal and vertical footcandles is included in Table 2. The unit of measurement used is a foot-candle (fc), which is a measurement of the light that is able to saturate one square foot. Horizontal foot-candles are the light intensity measured as it lands on a flat surface, while vertical foot-candles are light intensity measured as it lands on a vertical wall. Application examples of foot-candle measurements are provided below. These measurements are estimates as they may vary on the model and type of lighting used.

Table 2: Foot-candle Use Estimates

USE	ESTIMATED FOOT-CANDLES (FC)
Food courts	30 fc
Cashier stands	20–50 fc
Hotel bathrooms	20–50 fc
Department store	20–80 fc
Office reception and conference rooms	10–50 fc
Convention center stairways	5 fc
Exterior parking garages and vehicle storage	1–5 fc
School classrooms	30–50 fc
School hallways	10 fc
School gymnasiums	30–100 fc
High school football fields	30–70 fc
baseball and softball fields	30–100 fc

Source: LED Lighting Supply Recommended Foot Candle Chart

According to the vertical and horizontal foot-candle measurements at Western High School, the maximum measured intensity outside of the proposed field is 4.2 fc. The residences adjacent to the proposed field to the west along South Bella Vista Street have a range of 0.4 to 4.2 fc. Based on the comparison with the foot-candle estimates, the Proposed Project would result in the addition of new light and glare to the area. However, the intensity of the field lights would not be significant because of the diminishing intensity toward the edge of the school property. Furthermore, the Proposed Project would only permit the use of the field and field lights during school hours and some sporting events that would not go beyond 9:00 p.m.

Lighting will be included in accordance with District standards with lighting features designed to be angled toward the field and shielded to further minimize spillover outside of the field and onto nearby residences. The School and adjacent streets are already well lit and in an urban environment; therefore, the Project would not create a new source of substantial light or glare that would adversely affect the area. Impacts would be less than significant.

4.2 AGRICULTURE & FORESTRY RESOURCES

2.	AGRICULTURE & FOREST 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:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 the conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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4.2.1 Environmental Setting

Agricultural resources include prime farmland, farmland of statewide importance, unique farmland, farmland of local importance, and commercial grazing land as defined in the Guidelines for the Farmland Mapping and Monitoring Program, pursuant to Section 65570 of the Government Code; as well as land in a Williamson Act contract.

Prime farmland is land that has the best combination of physical and chemical characteristics for producing food, feed, fiber, forage, oilseed, and other agricultural crops with minimum inputs of fuel, fertilizer, pesticides, and labor and without intolerable soil erosion. (7U.S.C. 4201(c)(1)(A))

Unique farmland is land other than prime farmland that is used for the production of specific high-value food and fiber crops, such as, citrus, tree nuts, olives, cranberries, fruits, and vegetables. (7 U.S.C. 4201(c)(1)(B))

Additional farmland of statewide or local importance is land identified by state or local agencies for agricultural use but not of national significance. (7 U.S.C. 4201(c)(1)(C))

The California Legislature passed the Williamson Act in 1965 to preserve agricultural and open-space lands by discouraging premature and unnecessary conversion to urban uses. The act creates an arrangement whereby private landowners contract with counties and cities to voluntarily restrict their land to agricultural and compatible open-space uses.

The Williamson Act is a means to restrict the uses of agricultural and open-space lands to farming and ranching uses during the length of the contract period. The Williamson Act Program was also envisioned as a way for local governments to integrate the protection of open space and agricultural resources into their overall strategies for planning urban growth patterns.

4.2.2 Impact Analysis

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 Proposed Project site is designated in the City of Anaheim General Plan as School and zoned as Transitional, which includes land for agricultural uses in a transitory or interim use, or is restricted to limited uses because of special conditions, or not zoned to one of the zoning districts (City 2021a; City 2021b). Permitted uses within land zoned Transitional include agricultural uses, small-scale community-care facilities, mobile-home parks, public services, recreational uses, minor utilities, and others requiring conditional use permits or minor use permits. Land uses surrounding the Proposed Project include low- and medium-density residential. Surrounding zoning includes both Single-Family and Multiple-Family residential. The Proposed Project site is not identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on maps prepared

pursuant to the Department of Conservation (DOC 2022a). Therefore, the Proposed Project would not result in an impact associated with the conversion of farmland to non-agricultural use.

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

No Impact. There are no areas zoned for agricultural use on or near the Proposed Project site. Additionally, the City of Anaheim does not include any properties subject to the Williamson Act and has not reported to the DOC in 2020 and 2021 (DOC 2022b). Therefore, the Proposed Project would not result in an impact associated with Williamson Act lands or agricultural zoning.

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 City of Anaheim does not include any forest lands or timberland. Ornamental trees exist on the Proposed Project site; however, the proposed facility repairs would not result in any disturbance to the existing ornamental trees on site because the Project would take place within the existing field area. The Proposed Project would not result in an impact associated with forest land or timberland.

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

No Impact. Implementation of the Proposed Project would not result in any change to land use on site. Therefore, the Proposed Project would not result in an impact associated with forest land or the conversion of forest land to non-forest use.

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 the conversion of forest land to non-forest use?

No Impact. The Proposed Project site is located within a fully urbanized area. As per the City of Anaheim General Plan land use designations, the Proposed Project site is designated as Schools (City 2021a). Surrounding land use designations include Low and Medium Density Residential. The Project site is not within an area identified as Prime Farmland, Unique Farmland or Farmland of Statewide Importance (DOC 2022b). The Proposed Project would, therefore, have no impact.

4.3 AIR QUALITY

3.	AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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"/>

4.3.1 Environmental Setting

The Project site is located within the City of Anaheim in central Orange County. The Proposed Project site is located within the South Coast Air Basin (SCAB), and air quality regulation is administered by the South Coast Air Quality Management District (SCAQMD). The SCAQMD implements the programs and regulations required by the federal and state Clean Air Acts.

Atmospheric Setting

Air quality is a function of both the rate and location of pollutant emissions under the influence of meteorological conditions and topographical features. Atmospheric conditions such as wind speed, wind direction, and air temperature gradients interact with physical features of the landscape to determine their movement and dispersal and, consequently, their effect on air quality. The combination of topography and inversion layers generally prevents dispersion of air pollutants in the SCAB.

The climate of the SCAB is influenced by the semipermanent, high-pressure zone of the eastern Pacific, which results in a mild climate tempered by cool sea breezes. Although the SCAB has a semiarid climate, the air near the surface is typically moist due to the presence of a shallow marine layer. Except for infrequent periods when dry air is brought into the basin by offshore winds, the ocean effect is dominant. Periods of heavy fog are frequent; and low stratus clouds, often referred to as high fog, are a characteristic climate feature. Average temperatures for Anaheim, which is the nearest monitoring station to the Proposed Project site (WRCC 2017), range from an average low of 46.9 degrees Fahrenheit (°F) in December to an average high of 87.1°F in August. Rainfall averages approximately 14.09 inches a year, with almost all annual rainfall coming from the fringes of mid-latitude storms from late October to early April and summers being almost completely dry.

Winds are an important parameter in characterizing the air quality environment of a project site because they determine the regional pattern of air pollution transport and control the rate of dispersion near a source. Daytime winds in the SCAB are usually light breezes from off the coast as air moves regionally onshore from the cool Pacific Ocean. These winds are usually the strongest in the dry summer months. Nighttime winds in the SCAB result mainly from the drainage of cool air off the mountains to the east, and

they occur more often during the winter months and are usually lighter than the daytime winds. Between the periods of dominant airflow, periods of air stagnation may occur in both the morning and evening hours. Whether such a period of stagnation occurs is one of the critical determinants of air quality conditions on any given day.

During the winter and fall months, surface high-pressure systems north of the SCAB, combined with other meteorological conditions, can result in very strong winds from the northeast called Santa Ana winds. These winds normally have durations of a few days before predominant meteorological conditions are reestablished. The highest wind speed typically occurs during the afternoon due to daytime thermal convection caused by surface heating. This convection brings about a downward transfer of momentum from stronger winds aloft. It is not uncommon to have sustained winds of 60 miles per hour with higher gusts during a Santa Ana wind.

Regulatory Setting

The Proposed Project site lies within the SCAB, which is managed by the SCAQMD. National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) have been established for the following criteria pollutants: carbon monoxide (CO), ozone (O₃), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), inhalable particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), and lead. The CAAQS also set standards for sulfates, hydrogen sulfide, and visibility.

Areas are classified under the Federal Clean Air Act as either attainment or nonattainment areas for each criteria pollutant, based on whether the NAAQS have been achieved or not. Attainment relative to the state standards is determined by the California Air Resources Board (CARB). The SCAB has been designated by the federal Environmental Protection Agency (EPA) as a nonattainment area for O₃ and suspended particulates (PM_{2.5}). Currently, the SCAB is in attainment with the ambient air quality standards for CO, SO₂, PM₁₀ and NO₂. The SCAB is designated as partial nonattainment for lead based on two source-specific monitors in Vernon and in the City of Industry that are both near battery recycling facilities.

The EPA has designated the SCAB to be in extreme nonattainment for the 8-hour average ozone standard. The 1997 8-hour ozone NAAQS was strengthened from 0.08 parts per million (ppm) to 0.075 ppm, effective May 27, 2008. The 1997 8-hour ozone standard was revoked in implementation rules for the 2008 ozone NAAQS effective April 6, 2015. On October 1, 2015, the EPA again strengthened the 8-hour ozone NAAQS to 0.070 ppm effective December 28, 2015, retaining the same form as the previous 1997 and 2008 standards. The 2008 ozone NAAQS is a primary focus of the 2016 Air Quality Management Plan (AQMP).

Additionally, the EPA has designated the SCAB as nonattainment for PM_{2.5}. In 1997, the EPA established standards for PM_{2.5} (particles less than 2.5 micrometers), which were not implemented until March 2002. A subset of the PM₁₀ emissions, the PM_{2.5} standards were developed to complement the PM₁₀ standards that cover a full range of inhalable particle matter. For the PM₁₀ health standards, the annual PM₁₀ standard was revoked by the EPA on October 17, 2006; and the 24-hour average PM₁₀ nonattainment status was redesignated to attainment (maintenance) on July 26, 2013.

The 2012 AQMP provided measures to reduce PM_{2.5} emissions to within the federal standard by 2015. On January 25, 2013, the CARB approved the 2012 AQMP that was prepared per the federal Clean Air Act requirements to show attainment of the PM_{2.5} standard by the revised date of 2014. The 2012 AQMP built upon the approaches taken in the 2007 AQMP utilized to reduce PM_{2.5} emissions in the SCAB. On December 14, 2012, the EPA revised the primary annual PM_{2.5} NAAQS from 15 micrograms per cubic meter

($\mu\text{g}/\text{m}^3$) to $12 \mu\text{g}/\text{m}^3$. On March 3, 2017, the CARB approved the 2016 AQMP, which includes implementation strategies to meet the revised $\text{PM}_{2.5}$ standard.

The SCAB has been designated by CARB as a nonattainment area for O_3 , NO_2 , PM_{10} , $\text{PM}_{2.5}$, and lead. Currently, the SCAB is in attainment with the CAAQS for CO, SO_2 , and sulfates and is unclassified for visibility-reducing particles and hydrogen sulfide. The 2007, 2012, and 2016 AQMPs provide measures to meet the state standards for O_3 , NO_2 , PM_{10} , and $\text{PM}_{2.5}$.

4.3.2 Impact Analysis

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

Less Than Significant Impact. The South Coast AQMP is the air quality plan applicable to the Proposed Project site. The purpose of the AQMP is to provide direction that brings an area into compliance with federal and state air quality standards. The Proposed Project involves the demolition of the existing field and replacement of the field, as well as the addition of new bleachers and related accessory structures. During construction equipment required would introduce new temporary increases in emissions, including CO_2 , NO_2 , and PM. Additionally, the Project site would be watered at least once a day per SCAQMD Rule 403 to reduce dust emissions resulting from Project site activities. Construction of the Project would not introduce substantial emissions in the area. Other standard SCAQMD construction requirements that limit the time of day when construction may occur, as well as SCAQMD Rule 1108 that limits VOC content in asphalt and Rule 1113 that limits the VOC content in paints and solvents to minimize odor impacts from construction, would be complied with as well. Operational emissions associated with the Project are expected to be similar to existing conditions. Implementation of the Proposed Project would result in a less than significant impact.

- 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. Implementation of the Project would not result in a substantial increase of emissions during construction of the Project because construction would be temporary and short-term in nature, with construction activities expected to have a 12-month duration. Additionally, compliance with existing regulations set by the SCAQMD would ensure no net increase in criteria pollutants would occur. Operational emissions would remain similar to existing conditions because there is no change in land uses. The Proposed Project would result in a less than significant impact.

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

Less Than Significant Impact. The Proposed Project would not involve substantial construction activities and land uses would remain the same. The nearest sensitive receptors to the Proposed Project include the residential land uses immediately west of the Project site (less than 100 feet from the western edge of the school property), Danbrook Elementary School located northwest of the Project site, and students at Western High School. Construction of the Proposed Project would create air emissions that include fugitive dust and toxic air contaminant emissions from the operation of construction equipment; however, construction will only occur intermittently over a 12-month period. The ongoing operation of the Proposed Project is not anticipated to generate

emissions from any sources that would create substantial pollutant concentrations. Impacts would, therefore, 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. Individual responses to odors are highly variable and can result in a variety of effects. Generally, the impact of an odor results from a variety of factors, such as frequency, duration, offensiveness, location, and sensory perception. The frequency is a measure of how often an individual is exposed to an odor in the ambient environment. The intensity refers to an individual's or group's perception of the odor strength or concentration. The duration of an odor refers to the elapsed time over which an odor is experienced. The offensiveness of the odor is the subjective rating of the pleasantness or unpleasantness of an odor. The location accounts for the type of area in which a potentially affected person lives, works, or visits; the type of activity in which he or she is engaged; and the sensitivity of the impacted receptor.

The Proposed Project would not generate substantial emissions such as objectionable odors or dust. The objectionable odors that may be produced during the construction process would be temporary and would not likely be noticeable for extended periods of time beyond the Proposed Project site's boundaries. Students and staff would be prevented from accessing the Project site during construction activities, which would provide additional separation from odors produced during construction. Minor sources of odors associated with the Proposed Project would be primarily from the diesel equipment used during construction. As discussed in Section 4.3.2 Impact (a), construction activities are anticipated to be minor and would not include a significant amount of grading or demolition. Exhaust odors from diesel engines may be considered offensive to some individuals; however, diesel emissions will not be ongoing, and any emissions would disperse rapidly. Impacts would, therefore, be less than significant.

4.4 BIOLOGICAL RESOURCES

4.	BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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"/>
(b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<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"/>

4.	BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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"/>

4.4.1 Impact Analysis

- a) *Would the project have a substantial adverse effect, either directly or through habitat modification, on any species identified as 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 Proposed Project is located in a highly urbanized setting and is currently developed with Western High School, which consists of multiple one- and two-story structures. Vegetation at the Project site includes ornamental landscaping around the school buildings. The Proposed Project would include construction which would occur only at the football/soccer practice field adjacent to the existing classrooms (buildings 4A, 4B, 4C). Ground-disturbing activities would include the demolition of the football and soccer field and replacement with a synthetic turf practice field. While the potential for nesting birds within the current grandstand structure or nearby trees exists, a nesting bird survey would be completed as part of the BMPs included in the project. Impacts would be less than significant with mitigation.

- 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 or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

No Impact. The Project site does not contain any riparian habitat or sensitive natural communities. The Project site does not contain any vegetation or biological habitat that provides habitat for sensitive or special status species. The ornamental trees would not be altered during the construction of the Proposed Project. No impacts would occur.

- 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 not located on a federally protected wetland (USFWS 2022). Carbon Creek is located 0.14 mile southwest of the Project site and is a concrete-lined creek. This creek does

not support any wetland habitat, nor does the US Fish and Wildlife Service show any federally recognized wetlands within the channel near the Project site. Additionally, all work would be conducted within the Project site, and no impacts to the creek would occur. No impact to wetlands would occur.

- 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. There are no native biological habitats on the Project site, nor are any wildlife corridors located within the Project site due to the urban, built-out nature of the surrounding area. The Project site is currently urbanized and developed, with no wildlife habitat found on-site or in the western portion of Anaheim (City 2004). The implementation of the Project would have no impact regarding wildlife corridors.

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

No Impact. No local policies or ordinances protecting biological resources apply to the Project site. The District would not be required to comply with the City's tree protection ordinance, which applies to developments within the Scenic Overlay Zone. There would be no impact.

- 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 within the area of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. The Proposed Project consists of the demolition of an existing field and the installation of a new artificial turf field facility with bleacher seating, a concession building, press box, and restroom facilities. The Project site does not include any riparian or sensitive natural communities. The Project would not result in any impacts regarding conflict with adopted habitat conservation plans.

4.5 CULTURAL RESOURCES

5.	CULTURAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 type="checkbox"/>	<input checked="" type="checkbox"/>
(c)	Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.5.1 Impact Analysis

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

Less Than Significant Impact. Western High School is located on a 39-acre property comprising 11 permanent buildings and 13 portable buildings. Western High School was established in 1954; however, modifications and additional buildings were added to the site, including portable structures since that date. The School has had additions and/or renovations in 1957, 1973, and 1993. Renovation work has occurred over the years, with installation of portable classroom buildings occurring in 2010. Work associated with the Proposed Project would be completed on the existing field and would not involve any improvements to the existing permanent buildings, which have the potential to be designated as a historic resource. However due to extensive modifications and updates to the facilities since opening, it is unlikely these building would be eligible for consideration as historic resources. The Proposed Project would, therefore, have less than significant impacts to any historical resources.

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

No Impact. No known archaeological resources are located on the Proposed Project site. In addition, if any archaeological resources are encountered during construction activities, the District's Construction BMPs (see Section 1.5.3) related to cultural resources would be followed. Further, ground disturbance of any native soils or soils not previously disturbed would not occur as part of the Proposed Project. Therefore, no impacts are expected.

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

No Impact. The Proposed Project site is located in an urbanized area previously disturbed by past activities. In addition, if any human remains are encountered during construction activities, the District's Construction BMPs (see Section 1.5.3) related to cultural resources and procedures required by state law would be followed. Further, ground disturbance of any native soils or soils not previously disturbed would not occur as part of the Proposed Project. Therefore, no impacts are expected.

4.6 ENERGY

Con ti6.	ENERGY. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 type="checkbox"/>	<input checked="" 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"/>

4.6.1 Impact Analysis

- 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.

Construction-Related Energy Consumption

During construction, the Proposed Project would consume electricity to construct the new field and associated infrastructure. Electricity would be supplied to the Project site by Southern California Edison and would be obtained from the existing electrical lines near the Project site. The use of electricity from existing power lines rather than temporary diesel- or gasoline-powered generators would minimize impacts on fuel consumption. Electricity consumed during Project construction would vary throughout the construction period based on the construction activities being performed. Such electricity demand would be temporary and nominal, and would cease upon the completion of construction. Overall, construction activities associated with the Proposed Project would require limited electricity consumption that would not be expected to have an adverse impact on available electricity supplies and infrastructure. Therefore, the use of electricity during Project construction would not be wasteful, inefficient, or unnecessary.

Construction of the Proposed Project typically would not involve the consumption of natural gas. Natural gas would not be supplied to support construction activities; thus, there would be no demand generated by construction. Given that the Project site currently has natural gas service in the vicinity of the Project site, construction of the Proposed Project would be limited to installation of new natural gas connections within the Project site. Development of the Proposed Project would likely not require extensive infrastructure improvements to serve the Project site. Construction-related energy usage impacts associated with the installation of natural gas connections are expected to be confined to trenching to place the lines below surface. In addition, prior to ground disturbance, the proposed project would notify and coordinate with SoCalGas to identify the locations and depth of all existing gas lines and avoid disruption of gas service.

Construction activities associated with the Proposed Project would be required to adhere to all state and SCAQMD regulations for off-road equipment and on-road trucks, which provide minimum fuel efficiency standards. As such, construction activities for the Proposed Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources. Impacts regarding transportation energy would be less than significant. Development of the Project would not result in the need to manufacture construction materials or create new building material facilities specifically to supply the Proposed Project.

Operations-Related Energy Consumption

The Proposed Project would comply with all federal, State, and county requirements related to the consumption of natural gas, including CCR Title 24, Part 6: *Building Energy Efficiency Standards* and Part 11: *California Green Building Standards*. The CCR Title 24, Part 6 and Part 11 standards require numerous energy efficiency measures to be incorporated into the Proposed Project facility. Therefore, it is anticipated the Proposed Project will be designed and built to minimize electricity and natural gas use and that existing and planned electric and natural gas capacity and natural gas supplies would be sufficient to support the Proposed Project's natural gas demand. Thus, impacts to electricity and

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

It should be noted the Proposed Project will be designed and built to minimize transportation energy, and it is anticipated that existing and planned capacity and supplies of transportation fuels would be sufficient to support the Proposed Project's demand. Thus, impacts to transportation energy supply and infrastructure capacity would be less than significant, and no mitigation measures would be 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 Proposed Project would, at a minimum, comply with CCR Title 24, which regulates the amount of energy consumed by new development for heating, cooling, ventilation, and lighting. In addition, the City of Anaheim published its Greenhouse Emissions Reduction Plan, which included reduction targets for 2030, and 2045; this plan included improvements in electric consumption, and Project implementation would utilize energy efficient infrastructure to comply with the plan (City 2020a). Therefore, the Proposed Project would result in less than significant impacts associated with renewable energy or energy efficiency plans.

4.7 GEOLOGY AND SOILS

7.	GEOLOGY AND SOILS. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

7.	GEOLOGY AND SOILS. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 geological feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.7.1 Impact Analysis

- a) i) *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*

Less Than Significant Impact. The Project site is located approximately 7.8 miles northeast of the Newport-Inglewood Fault Zone (DOC 2022c). Although the Proposed Project is near a fault, the Project site is not located within a designated Alquist-Priolo Special Study Zone. Construction of the Proposed Project would not require deep excavation work that could affect any faults, nor would it create structures with long occupation periods that could face substantial impacts during earthquake events. The Project would be consistent with the City's safety codes and requirements. Impacts would be less than significant.

- ii) *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?*

Less Than Significant Impact. The Proposed Project site would include upgrades and creation of a new artificial turf field facility with bleacher seating, concession building, and restroom facilities. The Project site is located approximately 7.8 miles northeast of the Newport-Inglewood Fault Zone (DOC 2022c). Additionally, the renovations to the field would be consistent with the seismic safety and building codes and ADA accessibility requirements. Impacts would be less than significant.

- iii) *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?*

Less Than Significant Impact. Liquefaction is a process where soil behaves temporarily as a viscous liquid. Liquefaction typically occurs in areas where sediment is water-saturated during moderate to great earthquakes. The Department of Conservation (DOC 2022c) identifies that the area as susceptible to liquefaction. The Proposed Project includes construction of a new artificial turf field facility with bleacher seating, a concessions building, and restroom facilities. The Project site currently contains the field; overall, the use of the site would not change. Although the Project site is in an area with potential for liquefaction, the upgrading of the field would not include activities that would

increase hazards regarding seismic-related ground failure. The Proposed Project would, therefore, result in a less than significant impact.

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

No Impact. The Proposed Project site is not identified as an area prone to seismically induced landslides (DOC 2022c). The Project site is relatively flat, which would not induce or facilitate landslides. Implementation of the Project would result in no impact.

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

Less Than Significant Impact. The Proposed Project includes the demolition of the existing football and soccer field and the installation of an artificial turf field facility with bleacher seating, a concession building, and restroom facilities. The construction activities, including the demolition of the existing field, have the potential to result in soil erosion or the loss of topsoil. The other construction activities include upgrades and repairs that would have no impact related to soil erosion or loss of topsoil. With implementation of District BMPs, impacts will be less than significant. The BMPs noted above include the minimization of soil drop height during dumping, the application of water every four hours during active demolition, debris removal to reduce vehicle track out, and the prohibition of demolition activities when wind speeds exceed 25 miles per hour.

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. As discussed above, the Project site is not located in an area of slope instability but is susceptible to liquefaction (DOC 2022c). The Project site is relatively flat, and the Proposed Project includes replacement of the field and creation of an artificial turf field facility with bleacher seating, a concession building, and restroom facilities that would not result in an increased risk for landslide, lateral spreading (spreading of land on gentle slopes), subsidence (caving or sinking of land). The Project site is located in an area with the potential for liquefaction or collapse; however, given that the Project is simply the upgrading of existing facilities, it would not exacerbate any risks onsite regarding unstable soils. Therefore, impacts will 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. The Project site has been previously graded and developed with a school and field. The United States Department of Agriculture classifies the landform underlying the Proposed Project site as Metz loamy sand with soil containing minimal amounts of clay (USDA 2017). The native materials are capped locally by artificial fill where previously existing natural grades have been modified as part of urbanization. Due to the minimal clay content in the soil underlying the Proposed Project site, as well as previous grading and development on-site, it is unlikely that the Proposed Project site contains expansive soils. Implementation of the Proposed Project would not place new structures on expansive soils and would result in a less than significant impact.

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 rely on existing sewer infrastructure to accommodate wastewater disposal requirements, including the addition of new restrooms. The Project would not involve the use of septic tanks or any other alternative waste water disposal systems. No impact would occur.

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

No Impact. No known paleontological resources are located on the Proposed Project site. The Proposed Project site is located in an urbanized area previously disturbed by past activities. In addition, if any paleontological resources are encountered during construction activities, the District's Construction BMPs (see Section 1.4.2) related to cultural resources would be followed. Further, ground disturbance of any native soils or soils not previously disturbed would not occur as part of the Proposed Project. Therefore, no impacts are expected.

4.8 GREENHOUSE GAS EMISSIONS

8.	GREENHOUSE GAS EMISSIONS. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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"/>
(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"/>

4.8.1 Environmental Setting

Significant legislative and regulatory activities directly and indirectly affect climate change and greenhouse gases (GHGs) in California. The primary climate change legislation in California is AB 32, the California Global Warming Solutions Act of 2006. AB 32 focuses on reducing GHG emissions in California and requires that GHGs emitted in California be reduced to 1990 levels by the year 2020.

The California Air Resources Board (CARB) is the state agency charged with monitoring and regulating sources of emissions of GHGs in California that contribute to global warming to reduce emissions of GHGs. The CARB Governing Board approved the 1990 GHG emissions level of 427 million tonnes of CO₂ equivalent (MTCO₂e) on December 6, 2007. Therefore, in 2020, annual emissions in California are required to be at or below 427 MTCO₂e. In January 2017, the CARB Board approved the 2017 Climate Change Scoping Plan (Scoping Plan). The Scoping Plan aims to reduce 1990 levels by 40 percent by 2030. The Scoping Plan continues programs and activities that will be implemented primarily by state agencies but also includes actions by local government agencies. Primary strategies addressed in the Scoping Plan include new industrial and emission control technologies; alternative energy generation technologies; advanced energy conservation in lighting, heating, cooling, and ventilation; reduced-carbon fuels; hybrid and electric vehicles; and other methods of improving vehicle mileage. Local government will have a part in implementing some of these strategies. The Scoping Plan also calls for reductions in vehicle-associated GHG emissions through smart growth that will result in reductions in vehicle miles traveled (CARB 2017).

4.8.2 Impact Analysis

- 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. The Proposed Project would not increase the capacity of the school nor the number of activities that would occur at the Proposed Project site. During construction, equipment required would introduce new temporary increases in emissions; however, these would be temporary in nature and not result in a substantial increase short term emissions. No increases in long-term operational GHG emissions are anticipated to occur from the Proposed Project. Additionally, there would be no change in the current land uses. Therefore, implementation of the Proposed Project would result in a less than significant impact associated with greenhouse gas emissions.

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

Less Than Significant Impact. Neither the County nor SCAQMD has any specific plans, policies, or regulations adopted for reducing the emissions of GHGs. In 2020, the City of Anaheim published its Greenhouse Emissions Reduction Plan, which included reduction targets for 2030, and 2045; this plan included improvements in both electric consumption and conservation along with water usage (City 2020a). The Proposed Project's construction-related emissions are short-term and anticipated to be insignificant, and the operation of the Proposed Project would not create an increase in GHG emissions. The Proposed Project would not introduce a new use and would exist within the existing Western High School campus while also being required to comply with the current California Building Code; therefore, implementation of the Proposed Project would result in a less than significant impact associated with an applicable plan, policy, or regulation adopted for reducing the emissions of GHGs.

4.9 HAZARDS AND HAZARDOUS MATERIALS

9.	HAZARDS AND HAZARDOUS MATERIALS. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(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 type="checkbox"/>	<input checked="" 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 which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

9.	HAZARDS AND HAZARDOUS MATERIALS. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 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 checked="" type="checkbox"/>	<input 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"/>

4.9.1 Impact Analysis

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

Less Than Significant Impact. The Proposed Project will not include any significant structural renovations that would result in the accidental release of hazardous materials to the environment. The Proposed Project would involve the use of heavy equipment during construction that would emit emissions associated with internal combustion engines, (i.e., diesel and gasoline); however, once operational, the Proposed Project would only use chemicals associated with maintenance operations, including the use of commercial cleansers, lubricants, solvents, and paints, among other materials typically used in educational facilities. Maintenance materials would not be considered acutely hazardous and would be used in limited quantities at the Proposed Project site. Compliance with the existing regulations, including the manufacturer's product label and safety data sheets, would ensure that no significant hazard to the public, the students, or the environment would result through the routine transport, use, or disposal of hazardous materials. Therefore, implementation of the Proposed Project would result in less than significant impacts associated with the routine transport, use, or disposal of hazardous materials.

- 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?*

Less Than Significant Impact. The Proposed Project will not include any significant structural renovations that would result in the accidental release of hazardous materials to the environment. Because work would all be completed on the existing field area of the school, no asbestos-containing materials or lead-containing materials are expected to be discovered.

Additionally, as mentioned in Section 4.9.2 Impact (a), the construction phase of the Proposed Project would involve the use of equipment during construction that would emit emissions associated with internal combustion engines (i.e., diesel and gasoline); however, the use of fuels is regulated by the state and would be in compliance with all state regulations during construction. Operation of the

Proposed Project would be similar to existing operations and use of hazardous materials as part of maintenance activities would remain the same. Implementation of the Proposed Project would result in a less than significant impact associated with the release of hazardous materials.

- 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. The implementation of the Proposed Project includes creation of an artificial turf field facility with bleacher seating, a concession building, and restroom facilities at Western High School. The school closest to the Proposed Project site is Danbrook Elementary School, located immediately adjacent to and west of the Proposed Project site. As noted in the previous responses, the Proposed Project would involve the use of construction equipment that would emit emissions associated with internal combustion engines (i.e., diesel and gasoline). Once operational, the Proposed Project would involve minimal amounts of cleaning solvents and fuel for janitorial purposes and landscaping maintenance, which would be subject to federal, State, and local health and safety requirements, with materials being limited to staff use and access to students being prohibited. As discussed above in Impact 4.9.2 Impact (a), adherence to all local, county, State, and federal policies and regulations would reduce impacts to a level less than significant. Therefore, implementation of the Proposed Project would result in less than significant impacts associated with hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

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

No Impact. The Proposed Project site is not on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (SWRCB 2022; DTSC 2022); therefore, implementation of the Proposed Project would not result in an impact associated with known hazardous materials sites.

- e) *For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 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 Proposed Project site is located approximately 8.4 miles east of Long Beach Municipal Airport. Additionally, the Proposed Project site is not located within the Airport Influence Area for the Long Beach Municipal Airport or within its Runway Protection Zones (LACALUC 2018). Therefore, implementation of the Proposed Project would not result in an impact associated with a public airport.

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

Less Than Significant Impact. The Project site is surrounded by urbanized areas and residential structures. The Proposed Project would involve replacement of the football and soccer field with a new artificial turf field facility with bleacher seating, a concession building, and restroom facilities. These activities would not interference with established emergency response or emergency evacuation plans because there is no proposed alteration of infrastructure utilized in an evacuation plan. Therefore, implementation of the Proposed Project would result in a less than significant impact associated with an emergency evacuation plan.

- 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. The Proposed Project site is identified as a Non-Very High Fire Hazard Safety Zone (CAL FIRE 2022). Additionally, the Proposed Project is not located within or adjacent to wildlands or identified Very High Fire Hazard Safety Zones. Therefore, implementation of the Proposed Project would not result in an impact associated with wildland fires.

4.10 HYDROLOGY AND WATER QUALITY

10.	HYDROLOGY AND WATER QUALITY. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 flood 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 type="checkbox"/>	<input checked="" type="checkbox"/>

4.10.1 Impact Analysis

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

Less Than Significant Impact. The Proposed Project involves installation of an artificial turf field facility with bleacher seating, a concession building, and restroom facilities at the existing Western High School campus totaling approximately 3.2 acres of impacts. Work would be conducted outdoors on the existing field and would replace it with an artificial turf field. The disturbance would result in short-term impacts to site drainage during construction periods. If soil is not contained and is directly

exposed to rain, soil erosion and sediment could flow into the storm drain system, resulting in the potential degradation of water quality; however, the likelihood of a violation of water quality standards or waste discharge requirements would be reduced due to compliance with industry standard BMPs.

BMPs reduce the potential for erosion by implementing erosion and sediment control measures that regulate the amount and quality of runoff from a construction site. Due to the amount of soil disturbance (approximately 3.2 acres), the Proposed Project would be required to apply for a National Pollutant Discharge Elimination System (NPDES) permit and prepare a SWPPP based on the overall size of impacts associated with the Proposed Project. Implementation of BMPs, as well as implementation of new water retention systems, would ensure compliance with water quality standards and waste discharge requirements. Implementation of the SWPPP would reduce polluted stormwater runoff from the Project site and ensure compliance with the Orange County Water District (OCWD) Basin Alternative Plan. Therefore, implementation of the Proposed Project would result in less than significant impacts associated with water quality standards or waste discharge requirements.

- 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?*

Less Than Significant Impact. The Proposed Project involves installation of a new artificial turf field facility with bleacher seating, a concession building, and restroom facilities. The Proposed Project site is currently developed, and the majority of ground cover is pervious surface. These new facilities would introduce approximately 6,227 square feet of impervious surfaces. The Proposed Project would not significantly interfere with groundwater recharge, however, due to the inclusion of groundwater infiltration systems. Additionally, the Proposed Project would not increase the number of students or staff, and additional water resources would not be required to accommodate any such growth. Therefore, implementation of the Proposed Project would not result in impacts associated with groundwater recharge or groundwater depletion.

- 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. The Proposed Project site is in an urbanized location and is currently developed and mostly covered in impervious surfaces except for small areas landscaped with grass and trees. Ground disturbing activities would occur; and approximately 6,227 square feet of impervious surfaces would be introduced result from the practice facility however this would be offset by the use of infiltration systems in the turf. In addition, any construction which would result in ground disturbing activities would be required to utilize BMPs that would reduce any potential erosion or siltation on- or offsite. Further, the drainage pattern of the Proposed Project site and surrounding area is well established, and no streams or rivers are located on or near the Proposed Project site. Therefore, implementation of the Proposed Project would result in less than significant impacts associated with the existing drainage pattern.

- 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. The Proposed Project would not involve alteration of a stream or river. The Project site is located in an urban area and is partially covered with impervious surfaces. Demolition of the current field will involve re-grading for the replacement of the field with synthetic turf and infiltration systems. The new practice field which may incrementally increase the runoff would be offset by a new stormwater and rainwater retention system; this would not result in flooding on- or off-site. Implementation of the Project would result in a less than significant impact.

- iii) *Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources or polluted runoff; or*

Less Than Significant Impact. The Proposed Project would not impede any current stormwater drainage systems existing at the Project site. The Project includes improvements to the practice facility including drainage facilities associated with the artificial turf and restroom facilities, and these improvements would not create a substantial increase in runoff and maintenance required by artificial turf. The Proposed Project would remove the need for fertilizer and pesticides associated with turf fields that can run off into stormwater systems. Impacts would, therefore, be less than significant.

- iv) *Impede or redirect flood flows?*

Less Than Significant Impact. The Project site is located in a 0.2 percent flood hazard zone per the Federal Management Agency (FEMA 2022). The Project site is in Flood Zone X (Map # 06059C0109J), which is an area of 0.2 percent minimal flood hazard. Flood impacts would be less than significant.

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

No Impact. The Project site is located approximately 8.5 miles from the Pacific coast. Seiches are large waves generated by ground shaking effects within enclosed bodies of water. Tsunamis are tidal waves generated by fault displacement or major ground movement. The Project site is relatively flat and not located in any flood hazard, tsunami, or seiche zones. No impacts are expected.

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

No Impact. The Project would comply with all city, State, and federal regulations. Any construction that would result in ground disturbing activities would be required to utilize BMPs that would reduce any potential erosion or siltation on- or offsite. The Coastal Plain of Orange County Groundwater Basin has an approved alternative plan that established four management areas within the Basin, with the Proposed Project being located within the OCWD management area. The Basin Alternative Plan contains the region's water quality regulations and programs to implement the regulations (OCWD 2016). This plan allows OCWD to project future water demands based on historic water availability and demand.

As previously mentioned, the Project would apply for a NPDES permit and prepare a SWPPP. Implementation of the SWPPP would reduce polluted stormwater runoff from the Project site and

ensure compliance with the OCWD Basin Alternative Plan. Additionally, the Proposed Project would still allow groundwater recharge and not create need for additional water needs. No impacts are expected to occur.

4.11 LAND USE AND PLANNING

11.	LAND USE/PLANNING. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 type="checkbox"/>	<input checked="" type="checkbox"/>

4.11.1 Impact Analysis

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

No Impact. The public school at the Project site is bounded by residential developments to the north and west; Orange Avenue and South Western Avenue to the south and east, respectively; and Harvey Way to the south. The school is surrounded by single-family residences. The Proposed Project does not introduce new roads or facilities that would divide an established community. The Proposed Project includes the demolition and replacement of the field and new practice facility, which would not change current existing land uses. No impact 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?*

No Impact. The Project site is zoned Transitional and has a General Plan land use designation of School (City 2021a, 2021b) immediately surrounded by area designated as Low-Density Residential. The Proposed Project would not alter the function of the existing structure and would be compliant with the General Plan, as well as all relevant policies and regulations. No impacts are expected.

4.12 MINERAL RESOURCES

12.	MINERAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 type="checkbox"/>	<input checked="" type="checkbox"/>

4.12.1 Impact Analysis

- 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 State of California Division of Mines and Geology classified the Project site as a Mineral Resource Zone 4. There not adequate information indicating that no significant mineral deposits are present, and there is little likelihood of their presence in Anaheim (DOC 2022d). Currently the site operates as a field within an existing school, and no change in availability of mineral resources would occur. No impact 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. There are no existing or historic mineral resource sites in or near the Proposed Project site (DOC 2022e). In addition, the Project involves improvement of a field within an existing school and would not involve any mining or loss of mineral resources. Implementation of the Project would result in no impact.

4.13 NOISE

13.	NOISE Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 type="checkbox"/>	<input checked="" 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"/>

4.13.1 Environmental Setting

A Noise Study was prepared by Ldn Consulting, Inc. for the Proposed Project (Appendix B) that analyzes the potential noise impacts associated with the construction and operational activities at the site. Property lines surrounding the Project site are predominantly residential; therefore, a 60 dBA hourly noise standard would typically be applied per the City's Municipal Code. However, the school operations would be exempt under Chapter 6.70 of the Municipal Code. Section 6.72.040 states:

The following uses of sound-amplifying equipment and activities shall be exempt from the provisions of this chapter:

.050 Equipment and devices used as an integral part of any public or private institutional use lawfully permitted pursuant to Title 18 of this Code, including but not limited to, public and private educational institutions, and places of religious worship.

To determine the noise levels anticipated during an evening football game, noise measurements of a football game were conducted on Friday, October 28, 2022, between the hours of 6:00 p.m. and 9:00 p.m. at Western High School. The football game was held at Handel Stadium, a stadium used for District-wide events located at the northwestern portion of the campus. The noise levels during the measurements included people arriving to the game, crowds cheering, the high school band playing between plays and during intermissions, uses of the public announcements (PA) system, and then people leaving after the game. The primary noise levels consisted of crowds cheering, the high school band playing, and uses of the PA system. The average noise levels during the entire measurements were found to be roughly 58–65 dBA Leq.

To determine the noise levels anticipated during a band event, noise measurements of a band practice were conducted on Friday, November 18, 2022 between 7:30 a.m. and 8:00 a.m. at Western High School. Practice was held at the site of the proposed practice field. The practice included approximately 40 members of the school's marching band. The measurements were taken during the morning before normal school hours. The noise levels measured during the band practice were found to be roughly 70–79 dBA Leq during the entire practice.

4.13.2 Impact Analysis

- 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?*

Less Than Significant Impact.

Operational Noise Impacts

Based on the noise measurements taken during an evening football game at Handel Stadium at Western High School, it is possible to apply the noise levels to the practice field Project site. It was determined that noise levels could be as high as 68 dBA approximately 200 feet from the playing field. The nearest residences are located adjacent to the proposed practice field to the west. Although the proposed field will only be used for practice games, noise levels could potentially reach levels as high as those measured at Handel Stadium. Additionally, due to the close proximity to the residential property line to the west, noise levels are not expected to meet the City's noise threshold of 60 dBA. As stated above, these activities are existing and are exempt from the provisions of Section 6.70.010 of the City of Anaheim's Municipal Code.

Based on the noise measurements taken during band practice, it is possible to determine the noise levels at the nearest residences. The noise levels from the band practice along with the calculated hourly noise levels based upon the distances are shown below in Table 3 for the residential properties to the west, north, and east. Residential properties to the east of Western Avenue are located over 800 feet away and will be shielded by existing buildings.

Table 3: Band Practice Noise Levels

Property Line	Reference Noise Level (dBA)	Reference Distance (Feet)	Minimum Distance	Noise Reduction due to distance (dBA)	Resultant Noise Level (dBA Leq)
West	75	71.1	250	-10.5	60.6
North	50	79.1	950	-25.6	53.5
South	50	70.1	460	-19.3	50.8

Based on the property line noise levels determined from the football games and band practices, the high school's operational noise levels currently exceed and would likely continue to exceed the City's property line noise threshold at the surrounding residential uses. Though these events would occur only periodically, they would be expected to generate noise exceeding City standards at the nearest residences. As stated above, these activities are existing and are exempt from the provisions of Section 6.70.010 of the City of Anaheim's Municipal Code.

The equipment and devices used during the football games and band practices are an integral part of a public educational institution and, therefore, are exempt from the provisions of Section 6.70.011 of the City of Anaheim's Municipal Code. Pursuant to the City's Municipal Code, the existing and future operational uses are lawfully permitted.

Construction Noise Impacts

Project construction noise levels are considered exempt if activities occur within the hours of 7:00 a.m. and 7:00 p.m. as specified in the City of Anaheim Municipal Code, Section 6.70.010, unless approval is obtained from the City Building Official or City Engineer. At the time of this analysis, no Project construction activity is planned outside of the specified hours. Therefore, no impacts are anticipated, and no mitigation is required during construction of the Project. Additionally, all equipment should be properly fitted with mufflers, and all staging and maintenance would be conducted as far away for the existing residence as possible. Impacts would be less than significant.

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

Less Than Significant Impact. Groundborne vibration is an oscillatory motion that is often described by the average amplitude of its velocity in inches per second or, more specifically, peak particle velocity. Groundborne vibration is much less common than airborne noise. The Proposed Project would not cause groundbourne vibration impacts to sensitive receptors due to the demolition and replacement of the field and turf and other upgrades around the existing field. The construction activities are not expected to create a significant amount of groundborne vibration or groundborne noise. Impacts 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 us airport, would the project expose people residing or working in the project area to excessive noise levels?*

No Impact. As discussed in Section 4.9.2 Impact (e), the Proposed Project would not be located within an airport influence area and would not conflict with adopted or planned airport land use plans. The Project site is located over 8.4 miles east of the Long Beach Municipal Airport. The Proposed Project

would not be located within any airport influence areas (OCALUC 2007). No impacts are expected to occur.

4.14 POPULATION AND HOUSING

14.	POPULATION AND HOUSING. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 type="checkbox"/>	<input checked="" 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"/>

4.14.1 Impact Analysis

- 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)?*

No Impact. The Proposed Project consists of demolition and replacement of the existing football and soccer field and creation of a new artificial turf field facility with bleacher seating, a concession building, and restroom facilities. The Project would not create the need for additional housing in the area because the Project would not increase the capacity or student enrollment at Western High School. The Project would be located on an already existing school site with several roadways currently providing access to the site. The implementation of the Proposed Project would not result in an impact associated with population growth.

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

No Impact. The Proposed Project does not contain any residences or housing units to accommodate residential use. The upgrades to the existing practice field would not induce an increase in population. No impact would occur.

4.15 PUBLIC SERVICES

15.	PUBLIC SERVICES.	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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:				
	i) Fire Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	ii) Police Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.15.1 Impact Analysis

- a) i) *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 fire protection?*

No Impact. Fire protection services for the Project site would be provided the City of Anaheim Fire Department. The closest fire station located near the Project site is Station 11, which is approximately 0.3 mile east of the school. Fire protection service needs are generally related to the size of the population and geographic area served; the number and types of calls for service; and other community and physical characteristics. Because land uses at the Proposed Project site would remain the same as under current conditions, an increase in the demand for fire services resulting from the Proposed Project is not anticipated. The implementation of the Proposed Project would, therefore, not result in an impact.

- ii) *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 police protection?*

No Impact. The Proposed Project involves the demolition and replacement of the field among other upgrades in the existing field. The Anaheim Unified High School District maintains its own safety department to provide security for schools. The City of Anaheim police station closest to the Project site is located at 320 South Beach Boulevard, approximately 0.66 miles east of the Project site. The Project would not introduce an increase in population that would require additional police services on a regular basis. The Project would not result in an impact associated with police protection.

- iii) *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 schools?*

Less Than Significant Impact. The Proposed Project includes the removal of the existing field facilities and the creation of a new artificial turf field facility with bleacher seating, a concession building, and restroom facilities. The renovations would occur on school property at football/soccer practice field, which is located west of the Building 4 classrooms. The Proposed Project site's use would be limited during construction for a short period of time. Given that the Proposed Project site is a school, there may be some interruptions in the usage of the practice facility. The implementation of the Project would have a less than significant impact.

- iv) *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 parks?*

No Impact. The Proposed Project would not result in adverse physical impacts associated with the provision of new or physically altered facilities to maintain acceptable opportunities for parks. The closest parks to the Proposed Project site are Twila Reid Park at 3100 W. Orange Avenue (approximately 0.3 miles east of the Proposed Project site) and Hansen Park (approximately 0.7 miles southwest of the Proposed Project site). The Proposed Project would not directly or indirectly induce population growth. Therefore, implementation of the Proposed Project would not result in an impact associated with parks.

- v) *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 other public facilities?*

No Impact. The Proposed Project is not expected to impact any other public facilities.

4.16 RECREATION

16.	RECREATION. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

4.16.1 Impact Analysis

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

No Impact. The Project includes the demolition and replacement of the field, and of a new practice facility at Western High School. The Proposed Project would not directly or indirectly induce population that would increase the use of existing neighborhood, regional parks, or any other recreational facilities. As discussed above in Section 4.15.2 Impact (a.i), two recreational facilities are close to the Proposed Project site: Twila Reid Park (approximately 0.3 miles from the Proposed Project site) and Hansen Park (approximately 0.7 miles from the Proposed Project site) (Google 2022). Western High School does not use either of the nearby parks because the school provides its own recreational facilities to fulfill students' recreational needs. No impact would occur.

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

No Impact. The Proposed Project site is located at Western High School, which provides students with on-campus recreational facilities. Implementation of the Proposed Project would not require the construction or expansion of off-site recreational facilities. The Proposed Project is intended to upgrade school facilities for an existing student population and would not burden any facility beyond capacity by generating additional recreational users. Therefore, implementation of the Proposed Project would not result in an impact associated with the construction or expansion of recreational facilities.

4.17 TRANSPORTATION

17.	TRANSPORTATION. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, 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"/>
(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 type="checkbox"/>	<input checked="" type="checkbox"/>
(d)	Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.17.1 Environmental Setting

A memorandum was prepared by General Technologies and Solutions (GTS) to describe the vehicle miles traveled (VMT) screening analysis as well as a trip generation study for the Project (Appendix C).

4.17.2 Impact Analysis

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

Less Than Significant Impact. Given that the Project will serve the current student population and is not intended to increase the student enrollment, the Project will not generate net new trips. The trips on Saturdays, Sundays, as well as weekday PM peak hours are typically associated with sports practice, games, and other afterschool activities. The District reported that there is an existing joint-use agreement with the City regarding field use where the fields could be rented out for private groups when they are not being used by the school. However, trips for those private events renting the school facilities are local trips and considered as diverted trips from other sites and not net new trips (that is, events that would have taken place in other locations within the City).

The Proposed Project would not change the ongoing use of any existing roadways, bicycle lanes, or pedestrian paths. The Proposed Project includes creation of a new practice facility within the school's boundary, away from existing campus facilities. The Project is not expected to change any of the overall current traffic levels during operation. Although a minor increase in traffic would occur during construction, this impact will be short-term and limited in nature. Therefore, a less than significant impact would occur.

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

Less Than Significant Impact. The Proposed Project would be consistent with all City, State, and federal regulations. Pursuant to SB 743 technical guidance published by the Governor's Office of Planning and Research and the City of Anaheim Traffic Impact Analysis Guidelines for California Environmental Quality Act (June 2020), there are several screening procedures to potentially streamline project analysis (i.e., provide a presumptive non-impact finding and remove the need for a VMT analysis) (City 2020b). Prime among these are local-serving K-12 schools that can be presumed to have a less than significant transportation impact as well as projects generating fewer than 110 daily trips. The Project at hand satisfies both criteria, being a school with grades 9-12 school as well as generating fewer than 110 net new trips. Therefore, based on the VMT screening criteria, the Proposed Project represents a less than significant transportation impact based on VMT and no further VMT analysis is required.

- 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)?*

No Impact. The Proposed Project would not change any design features of the existing structures. There would be no change to the existing roadways, and the Project would not involve any incompatible uses. Implementation of the Project would not result in an impact.

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

No Impact. The Proposed Project would occur entirely within the Western High School campus and does not include changes to nearby roadways or emergency access routes. All lanes in the vicinity of the Proposed Project would remain open for emergency use; therefore, implementation of the Proposed Project would not result in an impact associated with emergency access.

4.18 TRIBAL CULTURAL RESOURCES

18.	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:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4.18.1 Impact Analysis

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

b) *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 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

a) **and b) Less Than Significant Impact.** The Proposed Project involves the replacement of the existing field and creation of new practice facilities at Western High School. Ground disturbance of any native soils or soils not previously disturbed will not occur as part of the Proposed Project. Previously, Tribal Cultural Resources have been discovered in creek areas, ridgelines, and vistas (City 2004). However, the Proposed Project site does not contain any of these features, and it is unlikely inadvertent discovery would occur. However, in the event that an inadvertent discovery does occur, BMPs as noted in section 1.4.2 would be implemented as needed. Additionally, AB 52 consultation was not required as part of the CEQA process due to the Proposed Project resulting in less than significant impacts and thus

being filed under a Notice of Exemption. Therefore, the Proposed Project would not result in an impact associated with tribal cultural resources.

4.19 UTILITIES AND SERVICE SYSTEMS

19.	UTILITIES/SERVICE SYSTEMS. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 wastes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4.19.1 Impact Analysis

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

Less Than Significant Impact. Implementation of the Proposed Project would not directly result in an increase in student or staff population. Post construction, the generation of wastewater and water usage on the Proposed Project site would not differ substantially from existing conditions. The demolition of the field and creation of the new artificial turf field facility with bleacher seating will decrease the perviousness of the area but would not substantially increase the generation of wastewater. Additionally, the site is already served by Anaheim Public Utilities and SoCal Gas, and addition of the new practice field would not substantially increase the need for electricity or natural gas on-site. Wastewater treatment is provided by the Orange County Sanitation District (OCSD) via wastewater connections from the City of Anaheim. Water supplies to the area are provided by the City of Anaheim and includes both groundwater and water purchased from the Metropolitan Water District. Telecommunications infrastructure would be expanded by use of Wi-Fi systems to connect to the existing network at Western High School. Therefore, implementation of the Proposed Project

would result in less than significant impacts associated with water and/or wastewater facilities, or other utility facilities.

- 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?*

No Impact. The City of Anaheim is responsible for supplying water to the Proposed Project site and for ensuring that the delivered water meets applicable California Department of Health Services standards for drinking water. Currently, the turf on the field is irrigated by water supplies provided by the City of Anaheim. While construction of the Proposed Project would require some expansion of water and wastewater infrastructure on-site, the new restroom facilities would support the existing student and staff populations. The Proposed Project would not allow for an increase the student or staff population once operational, but would support the existing population, and no water would be required for maintenance of the turf on the field. Accordingly, there would be no substantial increase in water supply requirements. In addition, the District would comply with local, regional, and state water conservation policies and would follow standard BMPs, including Title 22 regulations, to reduce water consumption. Implementation of the Proposed Project would not result in an impact associated with sufficient water supplies.

- 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?*

No Impact. As discussed above, the City of Anaheim provides sewer lines that connect to the OCSD, which treats wastewater within Orange County. Although the Proposed Project includes a new restroom facility, these are intended to serve the existing student and staff populations at the school and will not significantly increase wastewater needs. The Proposed Project would not result in a significant increase in population or result in a significant increase in wastewater. No impact would occur.

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

Less Than Significant Impact. During construction and operation of the Proposed Project, the District would comply with all city, county, and state solid waste diversion, reduction, and recycling mandates, including compliance with the county-wide Integrated Waste Management Plan (IWMP) (City 2004). Additionally, the Proposed Project would comply with City of Anaheim construction recycling requirements, which would require 65 percent of all debris be recycled/diverted (City 2022b). Therefore, implementation of the Proposed Project would result in a less than significant impact associated with waste regulations.

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

Less Than Significant Impact. The Proposed Project would not directly involve an increase in student or staff population and would not result in an operational increase in waste generation; however, construction of the Proposed Project would result in the generation of solid waste, including scrap lumber, concrete, residual waste, packaging material, plastics, and vegetation. To ensure optimal diversion of solid waste resources by a project, the District requires its contractors to comply with City

regulations regarding recycling or salvage nonhazardous waste materials generated during demolition and/or construction; foster material recovery and reuse; minimize disposal in landfills, and meet a goal of 65 percent of debris diversion (City 2022). Furthermore, impacts from construction activities will be short-term and intermittent, and will be minimized by BMPs and compliance with existing state solid waste reduction statutes. With the incorporation of these requirements into the Proposed Project, implementation of the Proposed Project would result in a less than significant impact associated with sufficient landfill capacity and would comply with all applicable regulations.

4.20 WILDFIRE

20.	WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>

4.20.1 Impact Analysis

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

Less Than Significant Impact. The Proposed Project will not impair an adopted emergency response plan or evacuation plan. The Proposed Project does not include any modifications of main roads that could be designated as emergency evacuation routes, nor does the Project include construction of facilities that would interfere with an emergency response or evacuation plan. Additionally, the Project is not located in area of High Fire Hazard zone; therefore, risks of wildfires are considered low (CAL FIRE 2022). Impacts would be less than significant.

b) *Would the project, 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?*

Less Than Significant Impact. The Proposed Project is not located within a Very High Fire Hazard Severity zone and, due to the type of Project, will not exacerbate wildfire risks (CAL FIRE 2022). Impacts would be less than significant.

- 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?*

Less Than Significant Impact. The Proposed Project does not include installation of any maintenance associated infrastructures that would exacerbate a fire risk. In addition, the Proposed Project is not located within a Very High Fire Hazard Severity zone. Impacts would be less than significant.

- 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?*

Less Than Significant Impact. The Proposed Project site does not include structures that would be exposed to downstream flooding or landslides. The Project does not include activities that would change the drainage or slope of the Project site. Impacts would be less than significant.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

21.	MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4.21.1 Impact Analysis

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

Less Than Significant Impact. The Project involves the demolition and replacement of the existing field and the creation of a new artificial turf practice field facility with bleacher seating. The upgrades

would not result in the destruction or significant modification of character defining features of the current structures. As discussed in Section 4.3, the Project site is located in an urbanized area that lacks native biological habitats. As discussed under Section 4.4, there were no historic resources or known archaeological or paleontological resources on-site. In addition, if any archaeological resources are encountered during construction activities, the District's Construction BMPs related to cultural resources will be followed. The Proposed Project will not have a significant impact on any fish, wildlife, or habitat. There are no streams, drainage courses, or wetlands located within the Project site vicinity. Therefore, the Proposed Project activities, including the implementation of the project design features noted in the project description, will have a less than significant impact regarding degrading the quality of the environment including biological and cultural resources.

- 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. In combination with other planned and pending development in the area, development of the Proposed Project would have less than significant cumulative impacts. Cumulative impacts for each applicable resource area have been addressed in the individual sections. Based on the preceding discussion, with implementation of the BMPs and Project Design Features included in this Initial Study, as well as compliance with existing regulations, the Proposed Project would not result in any significant adverse impacts. Impacts for other issue areas would be project specific. There are no other known projects currently in development that would affect the resource areas.

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

Less Than Significant Impact. Effects to human beings are generally associated with air quality, noise, traffic safety, geology/soils, and hazards/hazardous materials. As discussed in this Initial Study, with standard regulatory compliance and implementation of BMPs noted in Section 1.4.2, the Proposed Project would result in less than significant impacts related to these issues.

SECTION 5.0 – REFERENCES

The following is a list of references used in the preparation of this document.

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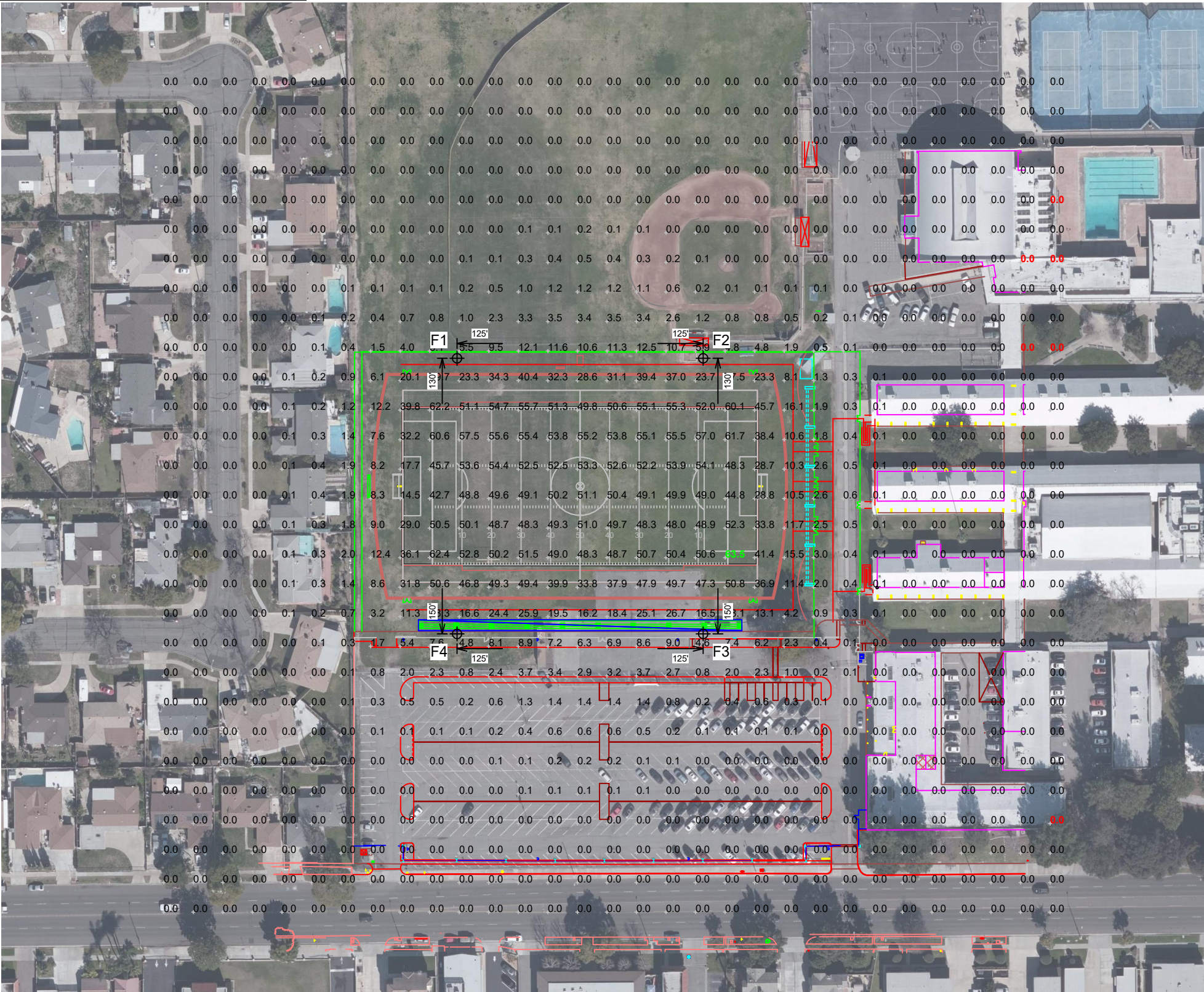
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APPENDIX A – Western High School Illumination Summary



EQUIPMENT LIST FOR AREAS SHOWN

Pole				Luminaires				
QTY	LOCATION	SIZE	GRADE ELEVATION	MOUNTING HEIGHT	LUMINAIRE TYPE	QTY / POLE	THIS GRID	OTHER GRIDS
2	F1-F2	80'	0'	15.52'	TLC-BT-575	2	2	0
				80'	TLC-LED-1500	8	8	0
2	F3-F4	80'	0'	25'	TLC-BT-575	2	2	0
				70'	TLC-LED-400	2	2	0
				80'	TLC-LED-1500	8	8	0
4	TOTALS					44	44	0



Western High School Football Soccer LED
Anaheim,CA

GRID SUMMARY

Name: Blanket Grid
Size: 360' x 195'
Spacing: 30.0' x 30.0'
Height: 3.0' above grade

ILLUMINATION SUMMARY

MAINTAINED HORIZONTAL FOOTCANDLES

Entire Grid

Scan Average: 6.19
Maximum: 64
Minimum: 0
Avg / Min: -

Max / Min: -

UG (adjacent pts): 127.09
CU: 0.91
No. of Points: 899

LUMINAIRE INFORMATION

Applied Circuits: A, B, C
No. of Luminaires: 44
Total Load: 51.96 kW

Guaranteed Performance: The ILLUMINATION described above is guaranteed per your Musco Warranty document and includes a 0.95 dirt depreciation factor.

Field Measurements: Individual field measurements may vary from computer-calculated predictions and should be taken in accordance with IESNA RP-6-15.

Electrical System Requirements: Refer to Amperage Draw Chart and/or the "Musco Control System Summary" for electrical sizing.

Installation Requirements: Results assume ± 3% nominal voltage at line side of the driver and structures located within 3 feet (1m) of design locations.

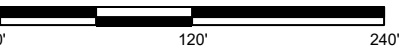


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ILLUMINATION SUMMARY



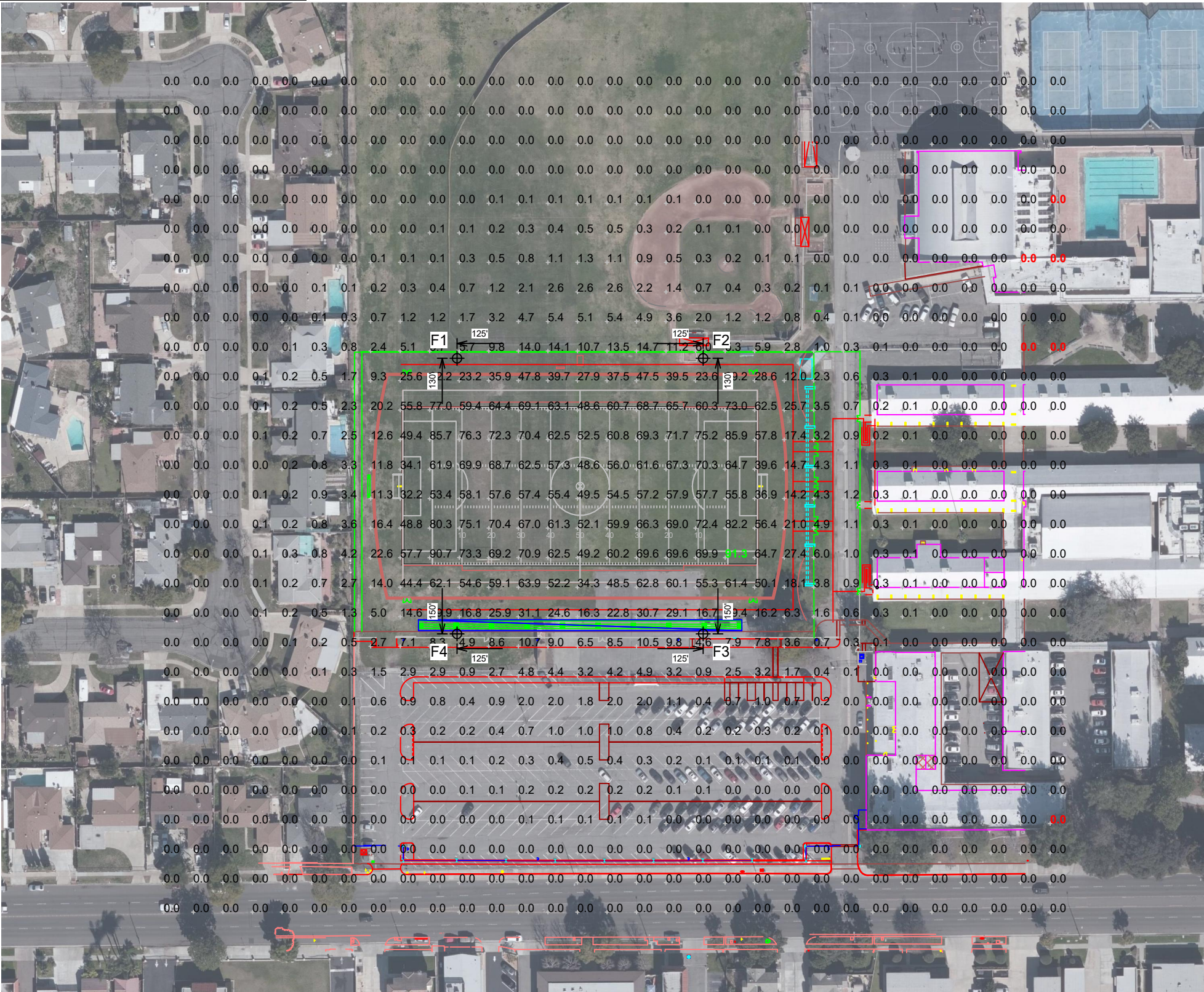
SCALE IN FEET 1 : 120



Pole location(s) ⚓ dimensions are relative to 0,0 reference point(s) ⊗

EQUIPMENT LIST FOR AREAS SHOWN

Pole				Luminaires				
QTY	LOCATION	SIZE	GRADE ELEVATION	MOUNTING HEIGHT	LUMINAIRE TYPE	QTY / POLE	THIS GRID	OTHER GRIDS
2	F1-F2	80'	0'	15.52'	TLC-BT-575	2	2	0
				80'	TLC-LED-1500	8	8	0
2	F3-F4	80'	0'	25'	TLC-BT-575	2	2	0
				70'	TLC-LED-400	2	2	0
				80'	TLC-LED-1500	8	8	0
4	TOTALS					44	44	0



Western High School Football Soccer LED
Anaheim,CA

GRID SUMMARY

Name: Blanket Grid
Size: 360' x 195'
Spacing: 30.0' x 30.0'
Height: 3.0' above grade

ILLUMINATION SUMMARY

MAINTAINED MAX VERTICAL FOOTCANDLES

Entire Grid

Scan Average: 7.90
Maximum: 91
Minimum: 0
Avg / Min: -
Max / Min: -
UG (adjacent pts): 70.09
CU: 0.91
No. of Points: 899

LUMINAIRE INFORMATION

Applied Circuits: A, B, C
No. of Luminaires: 44
Total Load: 51.96 kW

Guaranteed Performance: The ILLUMINATION described above is guaranteed per your Musco Warranty document and includes a 0.95 dirt depreciation factor.

Field Measurements: Individual field measurements may vary from computer-calculated predictions and should be taken in accordance with IESNA RP-6-15.

Electrical System Requirements: Refer to Amperage Draw Chart and/or the "Musco Control System Summary" for electrical sizing.

Installation Requirements: Results assume ± 3% nominal voltage at line side of the driver and structures located within 3 feet (1m) of design locations.



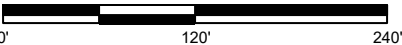
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ILLUMINATION SUMMARY



SCALE IN FEET 1 : 120



Pole location(s) ⚓ dimensions are relative to 0,0 reference point(s) ⊗

APPENDIX B – Noise Study



NOISE STUDY

Western High School Practice Field

City of Anaheim CA

Prepared For:

**Chambers Group, Inc.
5 Hutton Centre Dr, Suite 750
Santa Ana, CA 92707**

Prepared by:

Edin Consulting, Inc.

**42428 Chisolm Trail
Murrieta, CA 92562
760-473-1253**

January 3, 2023

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GLOSSARY OF TERMS

Sound Pressure Level (SPL): a ratio of one sound pressure to a reference pressure (L_{ref}) of 20 μ Pa. Because of the dynamic range of the human ear, the ratio is calculated logarithmically by $20 \log (L/L_{ref})$.

A-weighted Sound Pressure Level (dBA): Some frequencies of noise are more noticeable than others. To compensate for this fact, different sound frequencies are weighted more.

Minimum Sound Level (L_{min}): Minimum SPL or the lowest SPL measured over the time interval using the A-weighted network and slow time weighting.

Maximum Sound Level (L_{max}): Maximum SPL or the highest SPL measured over the time interval the A-weighted network and slow time weighting.

Equivalent sound level (L_{eq}): the true equivalent sound level measured over the run time. L_{eq} is the A-weighted steady sound level that contains the same total acoustical energy as the actual fluctuating sound level.

Day Night Sound Level (LDN): Representing the Day/Night sound level, this measurement is a 24 –hour average sound level where 10 dB is added to all the readings that occur between 10 pm and 7 am. This is primarily used in community noise regulations where there is a 10 dB “Penalty” for night time noise. Typically LDN’s are measured using A weighting.

Community Noise Exposure Level (CNEL): The accumulated exposure to sound measured in a 24-hour sampling interval and artificially boosted during certain hours. For CNEL, samples taken between 7 pm and 10 pm are boosted by 5 dB; samples taken between 10 pm and 7 am are boosted by 10 dB.

Octave Band: An octave band is defined as a frequency band whose upper band-edge frequency is twice the lower band frequency.

Third-Octave Band: A third-octave band is defined as a frequency band whose upper band-edge frequency is 1.26 times the lower band frequency.

Response Time (F,S,I): The response time is a standardized exponential time weighting of the input signal according to fast (F), slow (S) or impulse (I) time response relationships. Time response can be described with a time constant. The time constants for fast, slow and impulse responses are 1.0 seconds, 0.125 seconds and 0.35 milliseconds, respectively.

EXECUTIVE SUMMARY

This noise study has been completed to determine the noise impacts associated with the construction or operational activities from the Western High School Practice Field Project at the Western High School site in the City of Anaheim. The project is the construction and operation of upgraded athletic facilities on the Western High School campus.

The Project consists of a new artificial turf field at the existing football/soccer field intended to provide a practice field for Western High School use. The Project includes an observational Press Box, high netting, a scoreboard, modular concession building with restroom facilities, tiered bleachers under new metal shade structures with lighting/cameras and Wi-Fi, field lighting, entry canopy, marquee, fencing, landscaping and access improvements. The upgraded facility will offer enhanced exterior learning opportunities and increased safety for sports and student assemblies.

Operational Noise Levels

Based upon the property line noise levels determined from the football games and band practices, the high school's operational noise levels currently exceed and would likely continue to exceed the City's property line noise threshold at the surrounding residential uses. Though these events would occur only periodically, they would be expected to generate noise exceeding City standards at the nearest residences.

The equipment and devices used during the football games and band practices are an integral part of a public educational institution and therefore are exempt from the provisions of Section 6.70.010 of the City of Anaheim's Municipal Code. Pursuant to the City's Municipal Code, the existing and future operational uses are lawfully permitted and therefore no impacts are anticipated.

Construction Noise Levels

Project construction noise levels are considered exempt if activities occur within the hours specified in the City of Anaheim Municipal Code, Section 6.70.010 of 7:00 a.m. and 7:00 p.m. unless approval is obtained from the City Building Official or City Engineer. At the time of this analysis, no Project construction activity is planned outside of the specified hours. Therefore, no impacts are anticipated and no mitigation is required during construction of the Project. Additionally, all equipment should be properly fitted with mufflers and all staging and maintenance should be conducted as far away for the existing residence as possible.

1.0 PROJECT INTRODUCTION

1.1 Purpose of this Study

The purpose of this Noise study is to determine both construction and operational noise levels generated from the project to offsite uses.

1.2 Project Location

The project is located on the Anaheim Unified School District's Western High School Campus at 501 S Western Avenue within the City of Anaheim. Western High School is located in a built-out, urban area and is predominantly surrounded by residential and commercial uses. The campus is bound by Danbrook Elementary School and residential to the west; residential apartments to the north; S Western Avenue and residential to the east; and Orange Avenue, a church, and residential apartments to the south. Western Avenue and Orange Avenue provide primary access to the school vicinity and the school parking lots. A general project vicinity map is shown in Figure 1-A on Page 3 of this report; additionally, a site aerial map of the existing site is shown in Figure 1-B on Page 4 of this report.

1.3 Project Description

Western High School was built in the mid-1950's with additions and/or renovations in 1957, 1973, and 1993. Renovation work has occurred over the years with installation of portable classroom buildings occurring in 2010. The school is located at 501 S Western Avenue, Anaheim, CA 92804 and is situated in a residential area surrounded by housing on all sides and places of worship to the south. The school accommodates students from Grade 9 -12. The site is approximately 39 acres in size and encompasses 11 permanent buildings and 13 relocatable/portable buildings.

Western High School currently faces deteriorating campus building and athletic facilities. Anaheim Union High School District (District) proposes to improve athletic facilities by providing an artificial turf field facility with bleacher seating (Project). Measure H Funds were approved through a bond measure in 2014, and the District outlined the actions considered through the "Blueprint for the Future" document. The Blueprint Committee is comprised of students, parents, staff, and community members. Key topics for the Blueprint for the Future include: Student Learning, Technology for the Future, Safety and Security, Accountability and Finance, Energy Conservation and Sustainability, and Facilities, Fields, and Outdoor Areas.

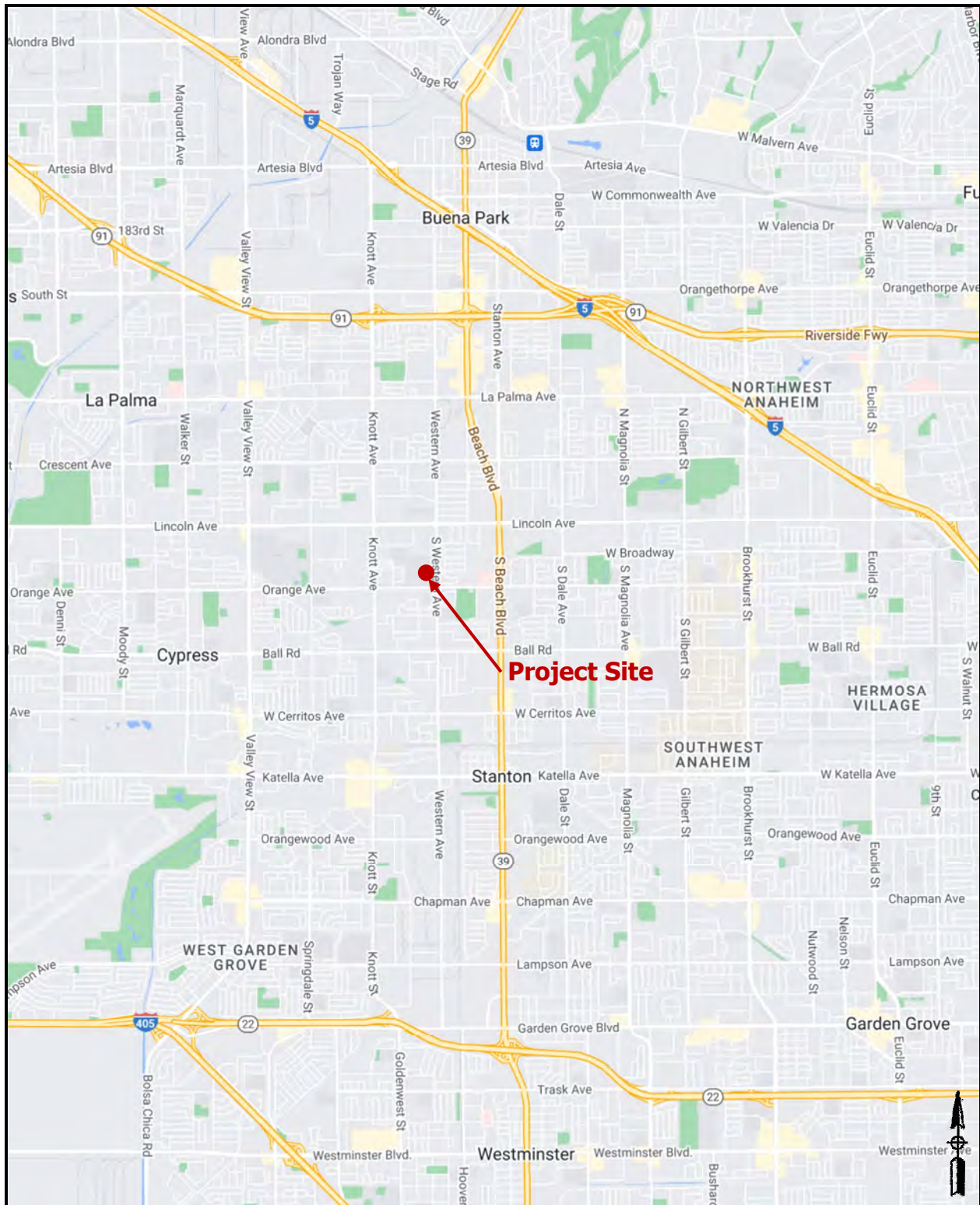
The new artificial turf field at the existing football/soccer field is intended to provide a practice field for Western High School use. The Project includes an observational Press Box, high netting, a scoreboard, modular concession building with restroom facilities, portable tiered bleachers under new metal shade structures with lighting/cameras and Wi-Fi, field lighting, entry canopy, marquee, fencing, landscaping and access improvements. The upgraded facility will offer enhanced exterior learning opportunities and increased safety for sports and student assemblies. The development plan is shown in Figure 1-C on Page 5 of this report.

The Project will consist of the following upgrades:

- *Construction of a fenced in artificial turf field within the existing school's athletic fields.*
- *Construction of an observational Press Box*
- *Addition of metal shade structures with lighting/cameras and Wi-Fi*
- *Provision of portable tiered bleachers under the metal shade structures*
- *Addition of four field lights*
- *Addition of scoreboard*
- *Construction of a modular concession building with restroom facilities*
- *Installation of an entry canopy, marquee and fencing*
- *Provision of landscaping and access improvements*
- *High netting*
- *Flagpole*
- *Storm/rain water retention system*

The project purpose supports the existing school and community population. The proposed athletic facilities component of the project does not include the construction of any new classrooms, and would not increase the student enrollment capacity of the campus. Furthermore, the project site is located in a fully developed urban area. Consequently, the project would not induce additional growth.

Figure 1-A: Project Vicinity Map



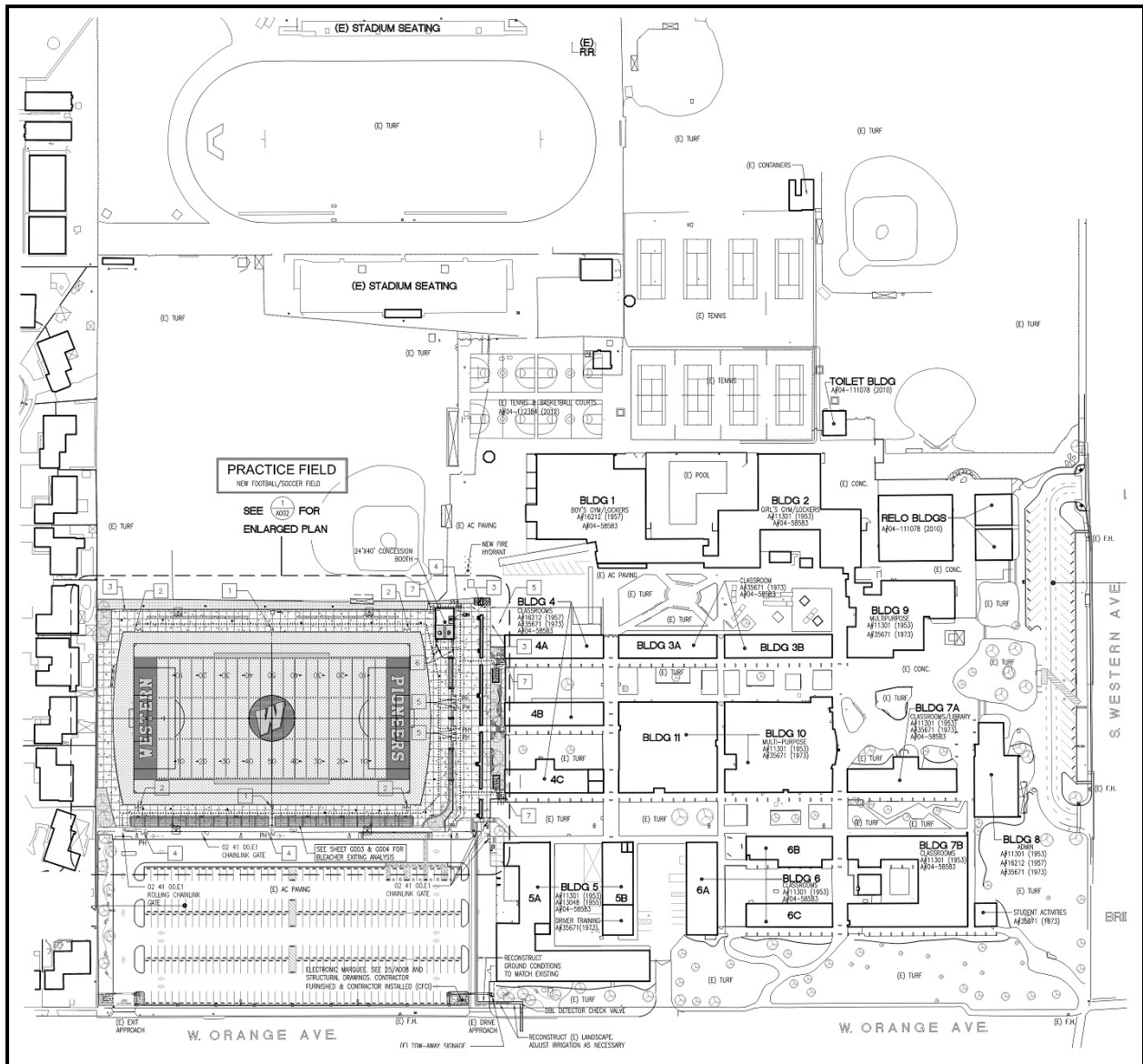
Source: Google Maps, 2022

Figure 1-B: Existing Site Layout



Source: Nearmap, 2022

Figure 1-C: Development Plan



2.0 ACOUSTICAL FUNDAMENTALS

Noise is defined as unwanted or annoying sound which interferes with or disrupts normal activities. Exposure to high noise levels has been demonstrated to cause hearing loss. The individual human response to environmental noise is based on the sensitivity of that individual, the type of noise that occurs and when the noise occurs.

Sound is measured on a logarithmic scale consisting of sound pressure levels known as a decibel (dB). The sounds heard by humans typically do not consist of a single frequency but of a broadband of frequencies having different sound pressure levels. The method for evaluating all the frequencies of the sound is to apply an A-weighting to reflect how the human ear responds to the different sound levels at different frequencies. The A-weighted sound level adequately describes the instantaneous noise whereas the equivalent sound level depicted as Leq represents a steady sound level containing the same total acoustical energy as the actual fluctuating sound level over a given time interval.

The Community Noise Equivalent Level (CNEL) is the 24 hour A-weighted average for sound, with corrections for evening and nighttime hours. The corrections require an addition of 5 decibels to sound levels in the evening hours between 7 p.m. and 10 p.m. and an addition of 10 decibels to sound levels at nighttime hours between 10 p.m. and 7 a.m. These additions are made to account for the increased sensitivity during the evening and nighttime hours when sound appears louder.

A vehicles noise level is from a combination of the noise produced by the engine, exhaust and tires. The cumulative traffic noise levels along a roadway segment are based on three primary factors: the amount of traffic, the travel speed of the traffic, and the vehicle mix ratio or number of medium and heavy trucks. The intensity of traffic noise is increased by higher traffic volumes, greater speeds and increased number of trucks.

Because mobile/traffic noise levels are calculated on a logarithmic scale, a doubling of the traffic noise or acoustical energy results in a noise level increase of 3 dBA. Therefore the doubling of the traffic volume, without changing the vehicle speeds or mix ratio, results in a noise increase of 3 dBA. Mobile noise levels radiant in an almost oblique fashion from the source and drop off at a rate of 3 dBA for each doubling of distance under hard site conditions and at a rate of 4.5 dBA for soft site conditions. Hard site conditions consist of concrete, asphalt and hard pack dirt while soft site conditions exist in areas having slight grade changes, landscaped areas and vegetation. On the other hand, fixed/point sources radiate outward uniformly as it travels away from the source. Their sound levels attenuate or drop off at a rate of 6 dBA for each doubling of distance.

3.0 SIGNIFICANCE THRESHOLDS AND STANDARDS

3.1 Operational Noise

Stationary sources of noise are governed under the local Municipal Code, Chapter 6.70, Sound Pressure Levels. Section 6.70.010 simply states that "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 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."

Exceptions

Section 6.72.040 states that the following uses of sound-amplifying equipment and activities shall be exempt from the provisions of this chapter: "Equipment and devices used as an integral part of any public or private institutional use lawfully permitted pursuant to this Code, including but not limited to, public and private educational institutions, and places of religious worship."

3.2 Construction Noise

The City recognizes that construction noise is difficult to control and restricts allowable hours for this intrusion. Section 6.70.010 of the City Municipal Code states that the sound created by construction or building repair of any premises within the City shall be exempt from the applications of the chapter between the hours of 7:00 a.m. and 7:00 p.m. Compliance with these provisions is mandatory and as such, does not constitute mitigation under CEQA. Still, construction, even when restricted to within these hours, presents a nuisance value when conducted in proximity to sensitive receptors and the impact is considered as potentially significant.

4.0 OPERATIONAL NOISE LEVELS

This section examines the potential operational noise source levels associated with the operation of the project. Noise from a fixed or point source drops off at a rate of 6 dBA for each doubling of distance. Which means a noise level of 70 dBA at 5 feet would be 64 dBA at 10 feet and 58 dBA at 20 feet. Property lines surrounding the project site are predominantly residential therefore a 60 dBA hourly noise standard would typically be applied per the City's Municipal Code. However, the school operations would be exempt under Chapter 6.70 of the Municipal Code.

4.1 Property Line Noise Levels

Events conducted within the athletic field currently include football, soccer, track and field, and band practices. The highest use of the field would be from evening football practice games. These events are existing and would occur only periodically.

Football Games

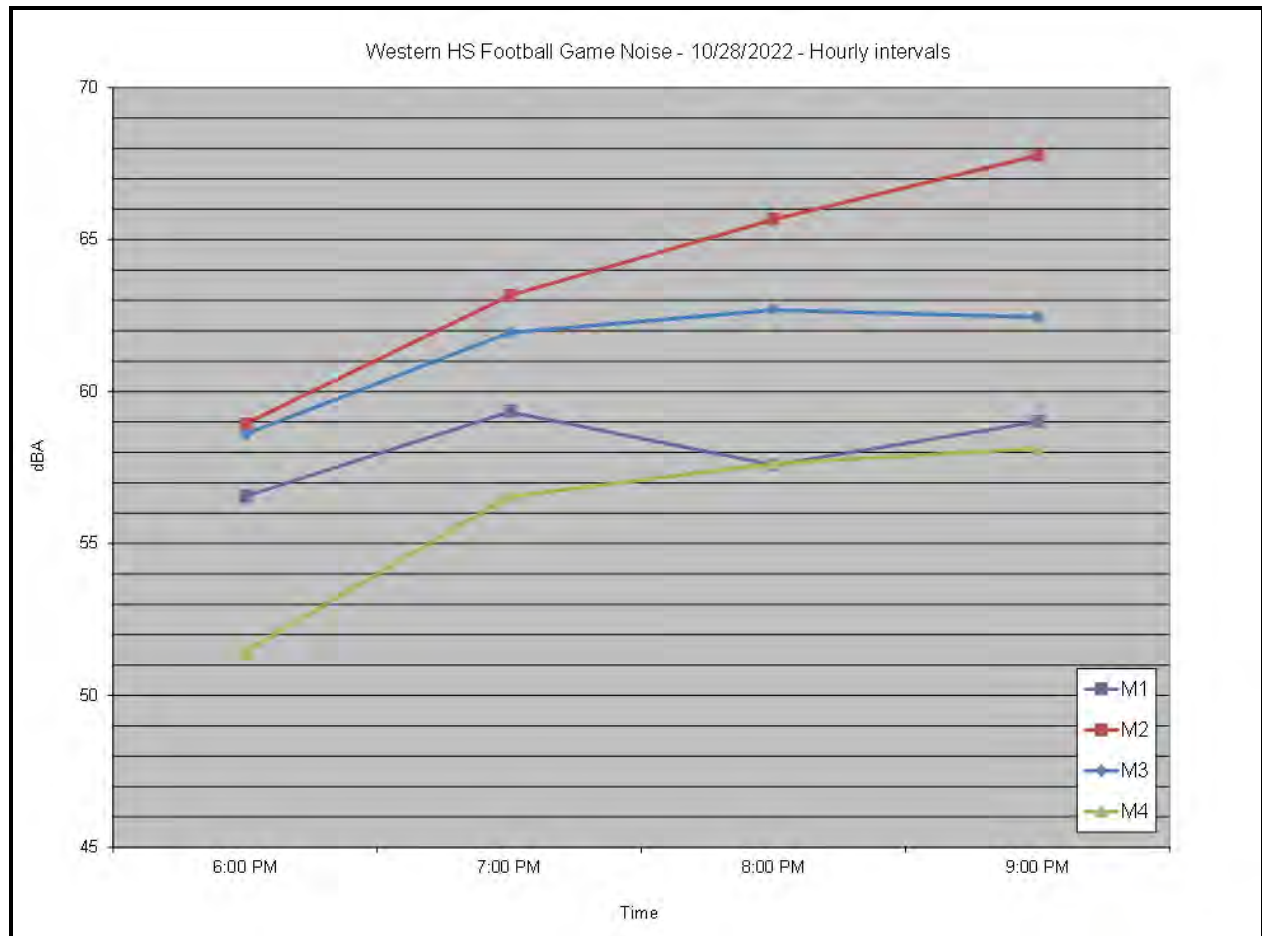
To determine the noise levels anticipated during an evening football game, noise measurements of a football game were conducted on Friday, October 28th between the hours of 6 pm and 9 pm at Western High School. The football game was held at Handel Stadium, a stadium used for District-wide events located at the northwestern portion of the campus. The measurements were taken in the evening hours when community noise levels are lower due to lower traffic volumes on adjacent roadways.

The noise levels during the measurements included people arriving to the game, crowds cheering, the high school band playing between plays and during intermissions along with the public announcements (PA) system and then people leaving after the game. The primary noise levels consisted of crowds cheering, the high school band playing along with the public announcements (PA) system. The average noise levels during the entire measurements were found to be roughly 58-65 dBA Leq as seen in Table 4-1. The hourly noise levels ranged from 51-68 dBA Leq as can be seen graphically in Figure 4-A below.

Table 4-1: Measured Noise Levels (during the entire game)

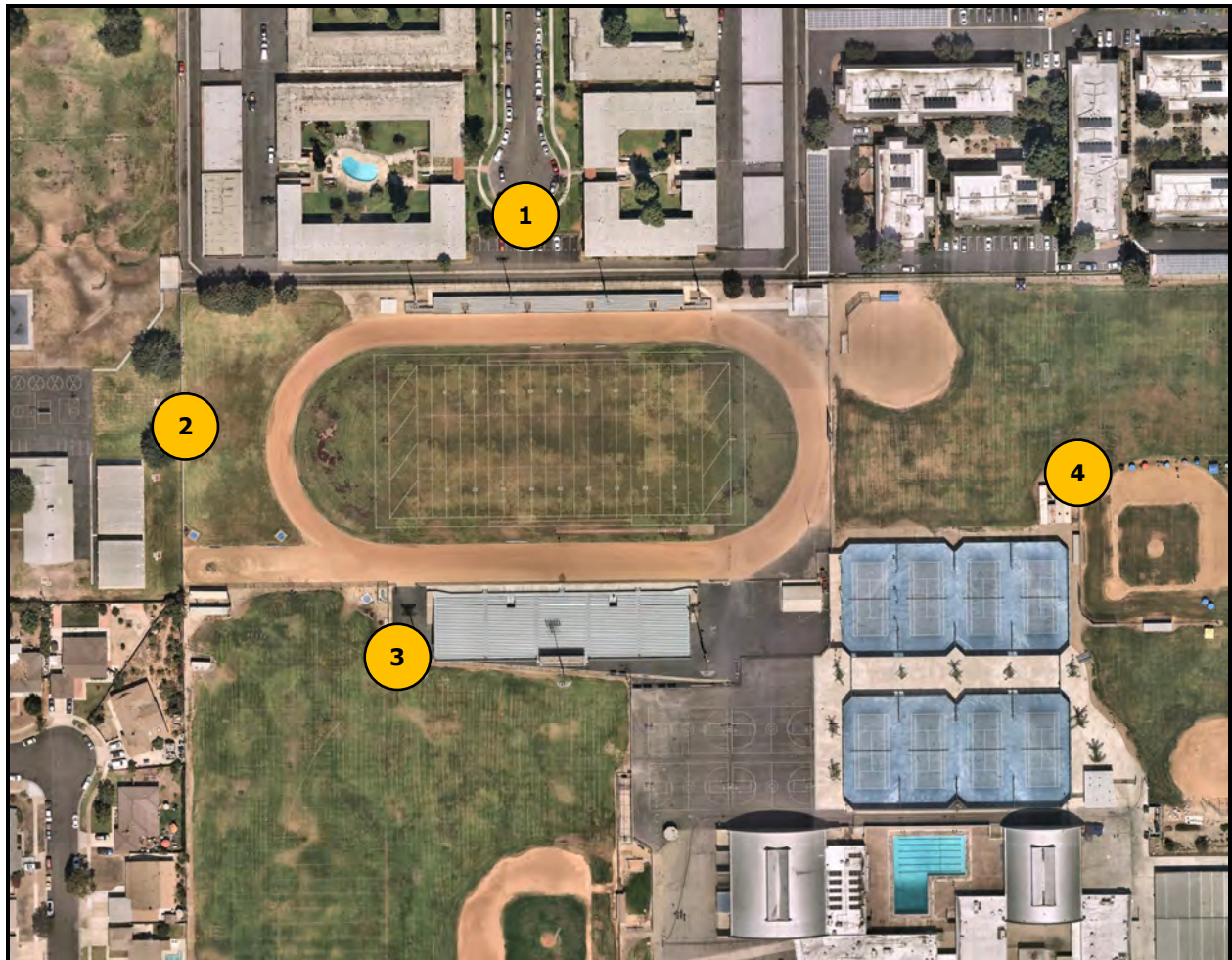
Location	Primary Noise Source	Date and Time	Average Noise Levels (dBA Leq)
M1	Football Game Activities (combination of PA System, Band playing and Crowd cheering)	October 28, 2022 6:00-9:00 p.m.	58.5
M2			65.4
M3			62.8
M4			59.5
Source: Ldn Consulting at Western High School Football Game.			

Figure 4-A: Noise Monitoring Results – Hourly Intervals



The noise measurements were taken using Larson-Davis Spark 706 Type 2 sound level meters, programmed, in "slow" mode, to record noise levels in "A" weighted form. The sound level meters were equipped with a windscreen during all measurements. The sound level meters were calibrated before and after the monitoring using a Larson-Davis calibrator, Model CAL 150. The noise monitoring locations are provided in Figure 4-B. The noise measurement data is provided as an attachment to this report.

Figure 4-B: Noise Monitoring Locations (Football Game)



Band Practice

To determine the noise levels anticipated during a band event, noise measurements of a band practice were conducted on Friday, November 18th between 7:30 am and 8:00 am at Western High School. Practice was held at the site of the proposed practice field. The practice included approximately 40 members of the school's marching band. The measurements were taken

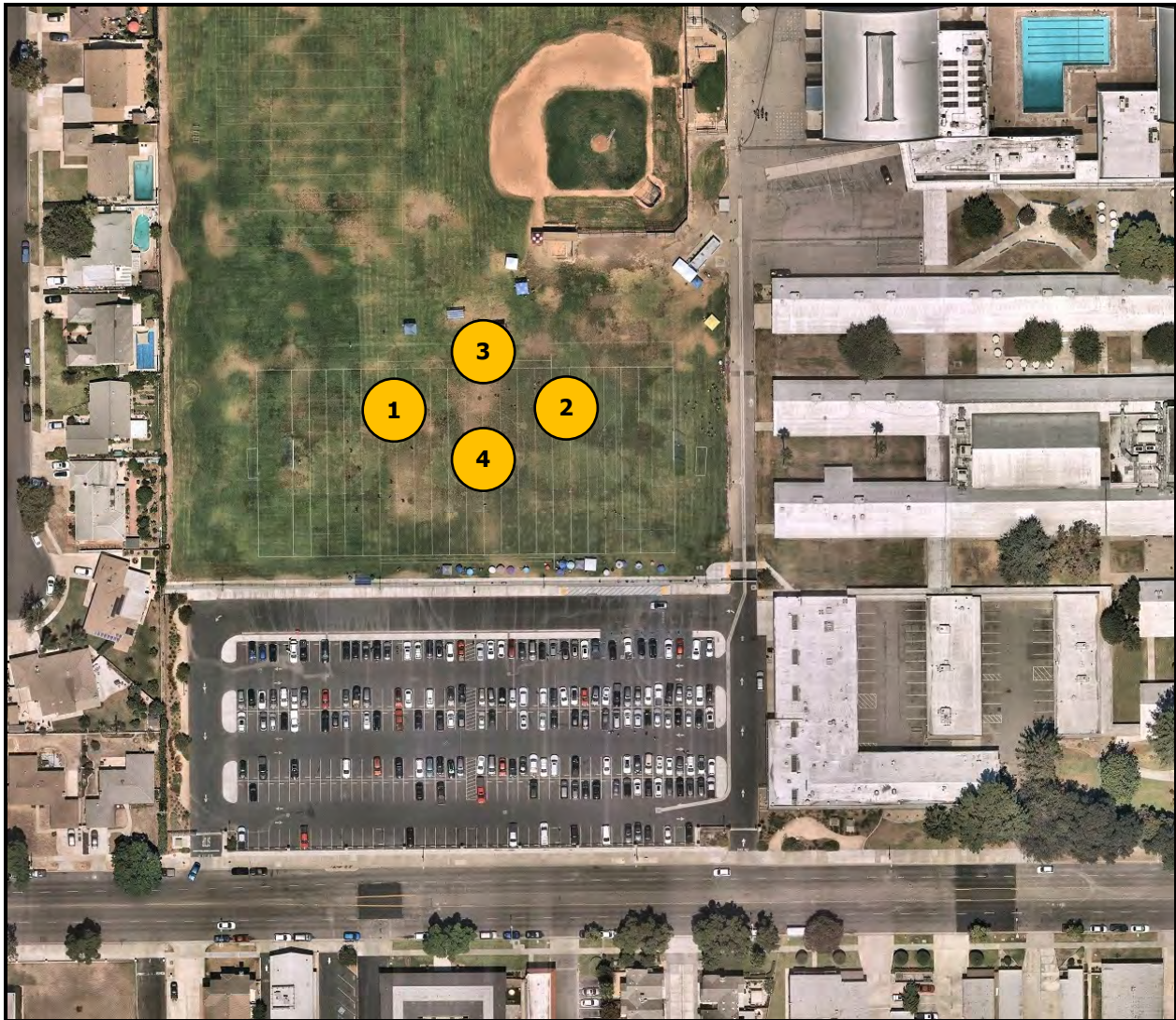
during the morning before normal school hours. The results of the noise level measurements are presented in Table 4-2. The noise levels measured during the band practice were found to be roughly 70-79 dBA Leq during the entire practice, in close proximity of the band within the field, during the entire practice.

Table 4-2: Measured Noise Levels (during entire band practice)

Location	Primary Noise Source	Date and Time	Average Noise Levels (dBA Leq)
M1	Band Practice	November 18, 2022 7:30-8:00 p.m.	71.1
M2			72.7
M3			79.1
M4			70.1
Source: Ldn Consulting at Western High School Band Practice.			

The noise measurements were taken using Larson-Davis Spark 706 Type 2 sound level meters, programmed, in "slow" mode, to record noise levels in "A" weighted form. The sound level meters were equipped with a windscreen during all measurements. The sound level meters were calibrated before and after the monitoring using a Larson-Davis calibrator, Model CAL 150. The noise monitoring locations are provided in Figure 4-C. The noise measurement data is provided as an attachment to this report.

Figure 4-C: Noise Monitoring Locations (Band Practice)



4.2 Findings and Conclusions

Findings

Based on the noise measurements taken during an evening football game at Handel Stadium at Western High School, it is possible to apply the noise levels to the practice field project site. It was determined that noise levels could be as high as 68 dBA approximately 200-feet from the playing field. The nearest residences are located adjacent to the proposed practice field to the west. Although the proposed field will only be used for practice games, noise levels could potentially reach levels as high as those measured at Handel Stadium. Additionally, due to the close proximity to the residential property line to the west, noise levels are not expected to meet the City's noise threshold of 60 dBA. As stated above, these activities are existing and are

exempt from the provisions of Section 6.70.010 of the City of Anaheim's Municipal Code.

Based on the noise measurements taken during band practice, it is possible to determine the noise levels at the nearest residences. The noise levels from the band practice along with the calculated hourly noise levels based upon the distances are shown below in Table 4-3 for the residential properties to the west, north, and east. Residential properties to the east of Western Avenue are located over 800-feet away and will be shielded by existing buildings.

Table 4-3: Band Practice Noise Level

Property Line	Reference Noise Level (dBA)	Reference Distance (Feet)	Minimum Distance to Property Line (Feet)	Noise Reduction due to distance (dBA)	Resultant Noise Level (dBA Leq)
West	75	71.1	250	-10.5	60.6
North	50	79.1	950	-25.6	53.5
South	50	70.1	460	-19.3	50.8

Based upon the property line noise levels determined from the football games and band practices, the high school's operational noise levels currently exceed and would likely continue to exceed the City's property line noise threshold at the surrounding residential uses. Though these events would occur only periodically, they would be expected to generate noise exceeding City standards at the nearest residences. As stated above, these activities are existing and are exempt from the provisions of Section 6.70.010 of the City of Anaheim's Municipal Code.

Conclusions

The equipment and devices used during the football games and band practices are an integral part of a public educational institution and therefore are exempt from the provisions of Section 6.70.011 of the City of Anaheim's Municipal Code. Pursuant to the City's Municipal Code, the existing and future operational uses are lawfully permitted.

5.0 CONSTRUCTION NOISE LEVELS

Construction noise represents a short-term impact on the ambient noise levels. Noise generated by construction equipment includes haul trucks, water trucks, graders, dozers, loaders and scrapers can reach relatively high levels. Grading activities typically represent one of the highest potential sources for noise impacts. The most effective method of controlling construction noise is through local control of construction hours and by limiting the hours of construction to normal weekday working hours. Division 4 of Article 9.5 of the City of San Diego Municipal Code (SDMC) addresses the limits of disturbing or offensive construction noise. The SDMC states that, with the exception of an emergency, it is unlawful to conduct any construction activity as to cause, at or beyond the property lines of any property zoned residential, an average sound level greater than 75 decibels during the 12-hour period from 7:00 a.m. to 7:00 p.m.

The U.S. Environmental Protection Agency (U.S. EPA) has compiled data regarding the noise generating characteristics of specific types of construction equipment. Noise levels generated by heavy construction equipment can range from 60 dBA to in excess of 100 dBA when measured at 50 feet. However, these noise levels diminish rapidly with distance from the construction site at a rate of approximately 6 dBA per doubling of distance. For example, a noise level of 75 dBA measured at 50 feet from the noise source to the receptor would be reduced to 69 dBA at 100 feet from the source to the receptor, and reduced to 63 dBA at 200 feet from the source.

The project site is generally flat with existing grades already near proposed grades. Therefore, no significant grading activities are anticipated. Grading activities would be limited to minor grade adjustments required for the preparation of the proposed surface improvements.

5.1 Construction Noise Levels

The Project is expected to occur over a 12 month period, approximately between the 4th Quarter of 2022 and the 4th Quarter of 2023. Construction activities will take place between the hours of 7:00 a.m. to 4:00 p.m. on Monday through Friday and 8:00 a.m. to 5:00 p.m. on Saturday. Construction Activities Once the Project has been approved by the District's Board of Trustees Education, project construction activities could begin in the 4th Quarter of 2022. The construction would begin after the Division of the State Architect (DSA) approval of plans and specifications is obtained and the contract for construction is awarded.

The existing natural turf field will be excavated for the installation of the artificial turf. Construction equipment to be used during construction of the Project upgrades include the following items: loaders, pick-up trucks, backhoe, water truck, crane, asphalt paver, and excavators.

5.2 Conclusions

Project construction noise levels are considered exempt if activities occur within the hours specified in the City of Anaheim Municipal Code, Section 6.70.010 of 7:00 a.m. and 7:00 p.m. unless approval is obtained from the City Building Official or City Engineer. At the time of this analysis, no Project construction activity is planned outside of the specified hours. Therefore, no impacts are anticipated and no mitigation is required during construction of the Project. Additionally, all equipment should be properly fitted with mufflers and all staging and maintenance should be conducted as far away from the existing residence as possible.

ATTACHMENT A

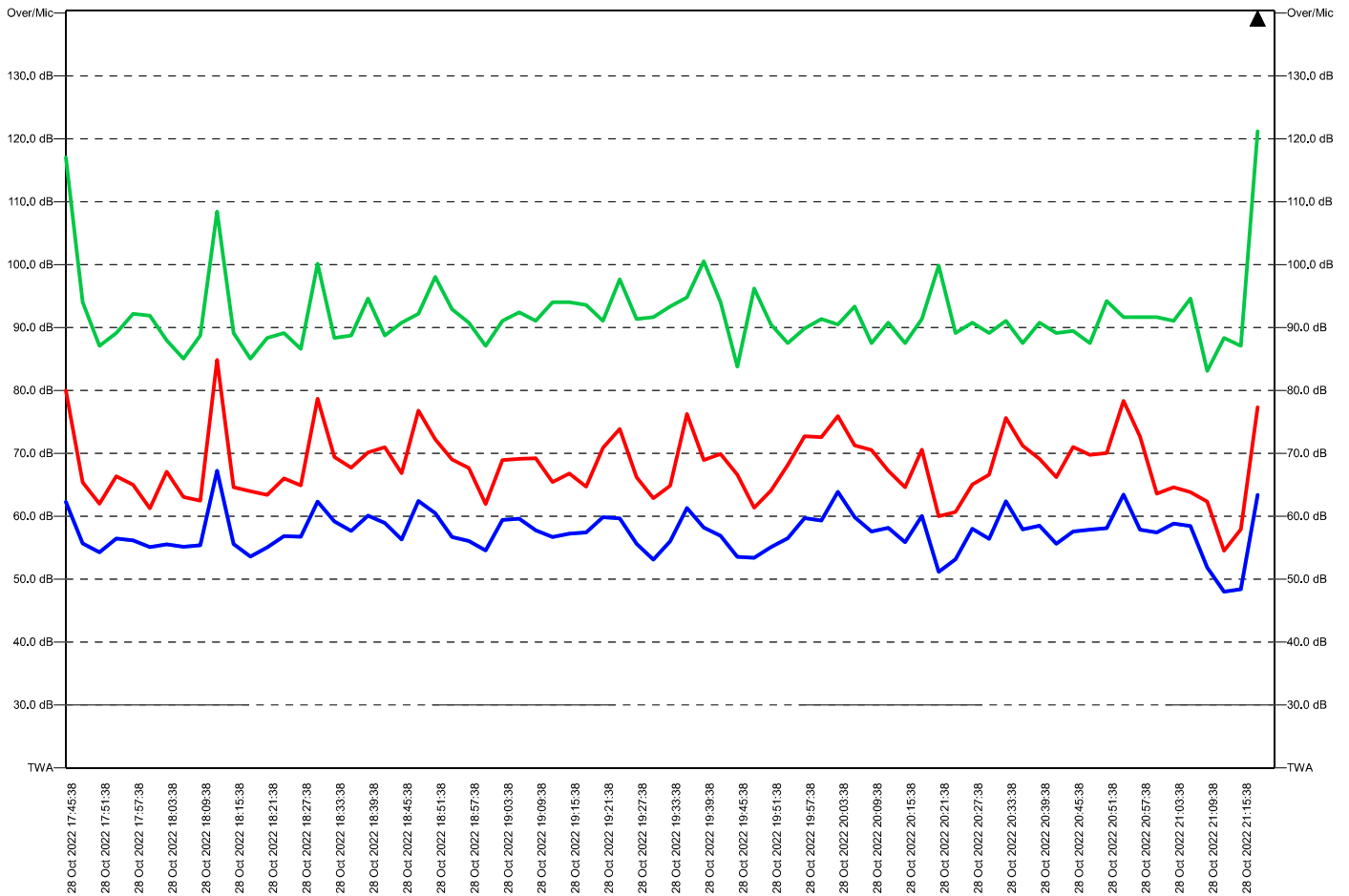
NOISE MEASUREMENT DATA

Serial Number:	02996	Start:	28 Oct 2022 18:18:11
Model Number:	706	Stop:	28 Oct 2022 21:09:11
RMS Weighting:	A Weighting	Run Time:	02:51:00
Peak Weighting:	Unweighted	Pre Calibration:	None
Detector:	Slow	Post Calibration:	29 Oct 2022 20:39 13.50 dBA
Gain:	30 dB	Deviation:	—
Sample Period:	60 seconds	Periods:	171

Exchange Rate:	3	Dose:	0.0 %
Threshold:	30.0 dBA	Projected Dose:	0.1 %
Criterion Level:	90.0 dBA	Leq:	58.5 dBA
Criterion Duration:	8.0 hours	TWA:	58.5 dBA
		TWA (8):	55.1 dBA
L10:	60.5 dBA	Lmax:	84.6 dBA
L30:	56.5 dBA	Lpeak (max):	120.9 dB
L50:	53.5 dBA	SEA:	120.9 dB
L70:	51.0 dBA	Lep (8):	55.1 dBA
L90:	48.0 dBA	SE:	0.0 Pa ² hr

Note:

Time History

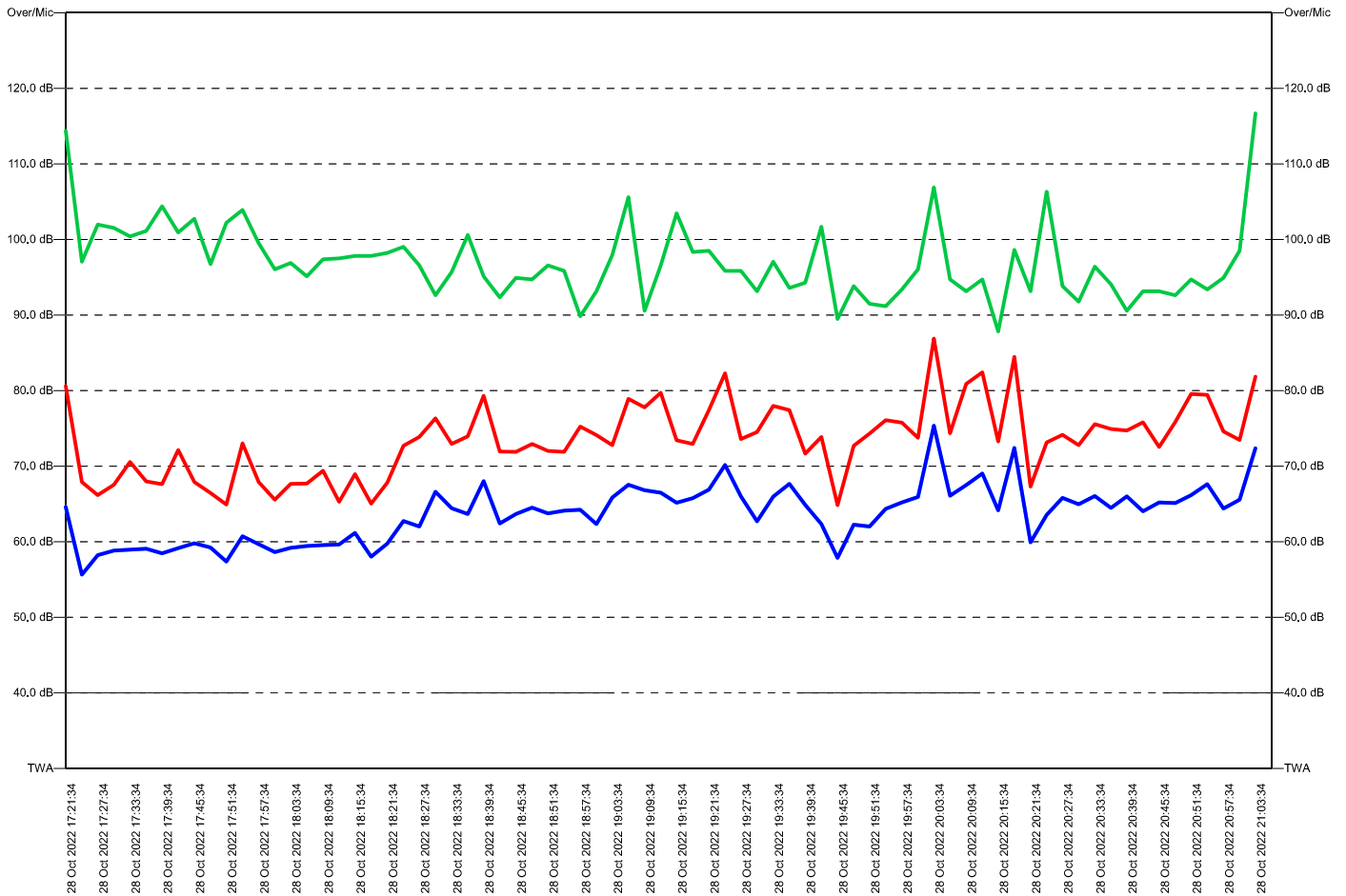


Serial Number:	17806	Start:	28 Oct 2022 17:21:34
Model Number:	706RC	Stop:	28 Oct 2022 21:04:34
RMS Weighting:	A Weighting	Run Time:	03:43:00
Peak Weighting:	Unweighted	Pre Calibration:	None
Detector:	Slow	Post Calibration:	29 Oct 2022 14:15 13.60 dBA
Gain:	30 dB	Deviation:	—
Sample Period:	60 seconds	Periods:	223

Exchange Rate:	3	Dose:	0.2 %
Threshold:	30.0 dBA	Projected Dose:	0.3 %
Criterion Level:	90.0 dBA	Leq:	65.4 dBA
Criterion Duration:	8.0 hours	TWA:	65.4 dBA
		TWA (8):	62.0 dBA
L10:	68.0 dBA	Lmax:	86.9 dBA
L30:	63.5 dBA	Lpeak (max):	116.7 dB
L50:	60.5 dBA	SEA:	--- dB
L70:	58.0 dBA	Lep (8):	62.0 dBA
L90:	55.0 dBA	SE:	0.0 Pa ² hr

Note:

Time History

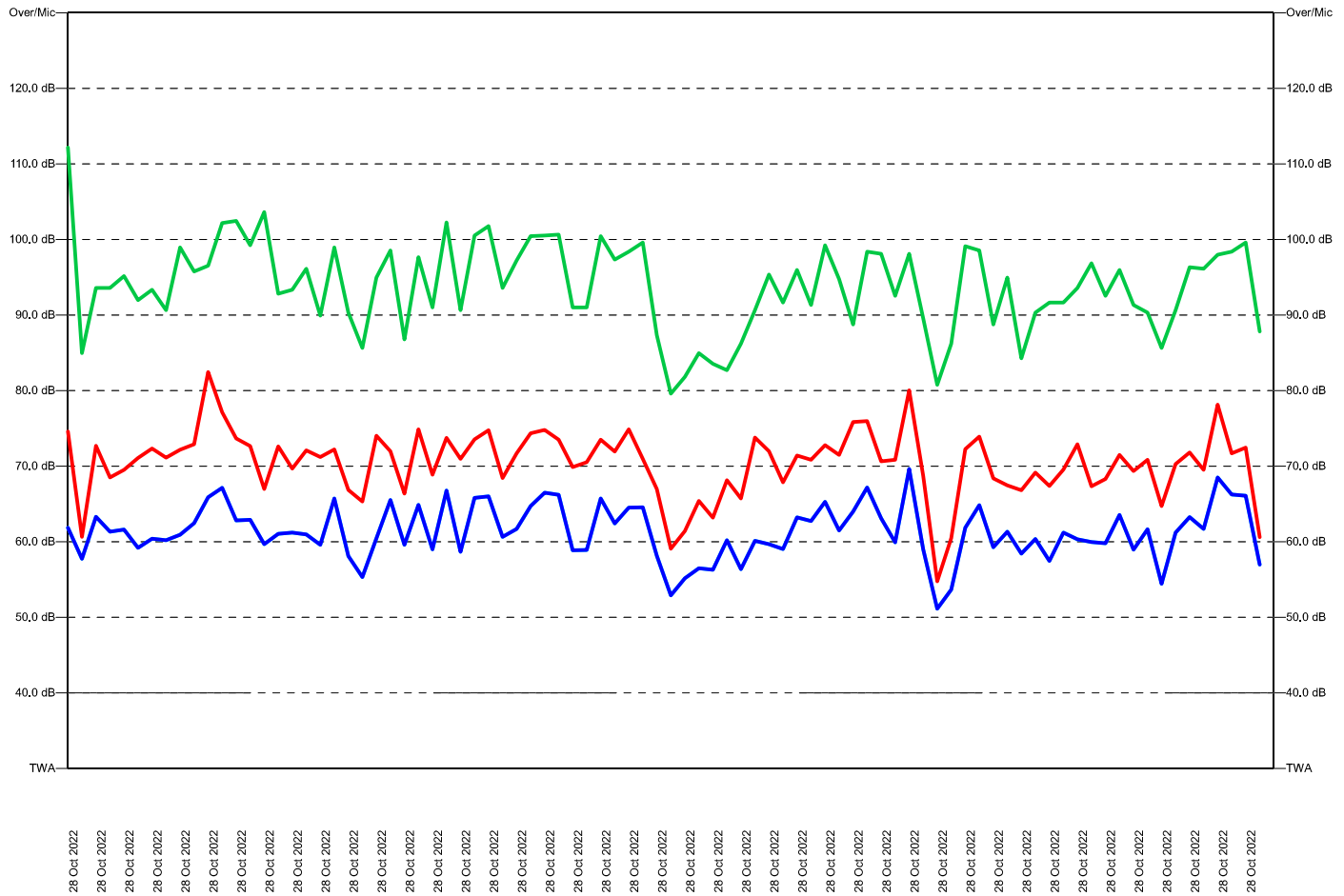


Serial Number:	02996	Start:	28 Oct 2022 18:18:11
Model Number:	706	Stop:	28 Oct 2022 21:09:11
RMS Weighting:	A Weighting	Run Time:	02:51:00
Peak Weighting:	Unweighted	Pre Calibration:	None
Detector:	Slow	Post Calibration:	29 Oct 2022 20:39 13.50 dBA
Gain:	30 dB	Deviation:	—
Sample Period:	60 seconds	Periods:	171

Exchange Rate:	3	Dose:	0.1 %
Threshold:	30.0 dBA	Projected Dose:	0.2 %
Criterion Level:	90.0 dBA	Leq:	62.8 dBA
Criterion Duration:	8.0 hours	TWA:	62.8 dBA
		TWA (8):	58.3 dBA
L10:	67.0 dBA	Lmax:	82.5 dBA
L30:	60.0 dBA	Lpeak (max):	112.2 dB
L50:	56.0 dBA	SEA:	--- dB
L70:	53.5 dBA	Lep (8):	58.3 dBA
L90:	51.0 dBA	SE:	0.0 Pa ² hr

Note:

Time History

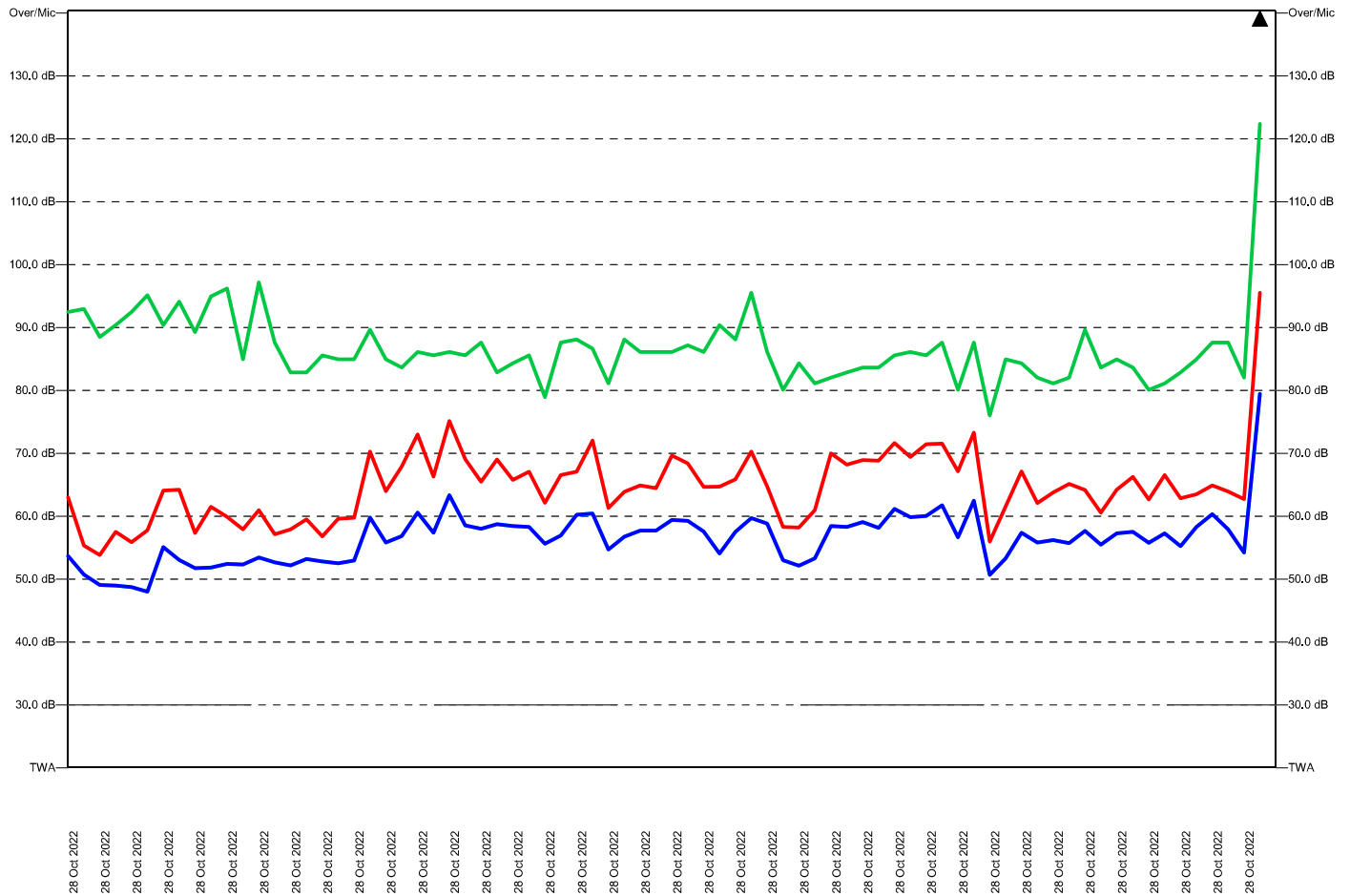


Serial Number:	02998	Start:	28 Oct 2022 17:28:11
Model Number:	706	Stop:	28 Oct 2022 21:14:11
RMS Weighting:	A Weighting	Run Time:	03:46:00
Peak Weighting:	Unweighted	Pre Calibration:	None
Detector:	Slow	Post Calibration:	29 Oct 2022 21:25 13.10 dBA
Gain:	30 dB	Deviation:	—
Sample Period:	60 seconds	Periods:	226

Exchange Rate:	3	Dose:	0.0 %
Threshold:	30.0 dBA	Projected Dose:	0.1 %
Criterion Level:	90.0 dBA	Leq:	59.5 dBA
Criterion Duration:	8.0 hours	TWA:	59.5 dBA
		TWA (8):	56.3 dBA
L10:	60.5 dBA	Lmax:	95.3 dBA
L30:	56.0 dBA	Lpeak (max):	122.1 dB
L50:	53.5 dBA	SEA:	122.1 dB
L70:	51.5 dBA	Lep (8):	56.3 dBA
L90:	49.5 dBA	SE:	0.0 Pa ² hr

Note:

Time History

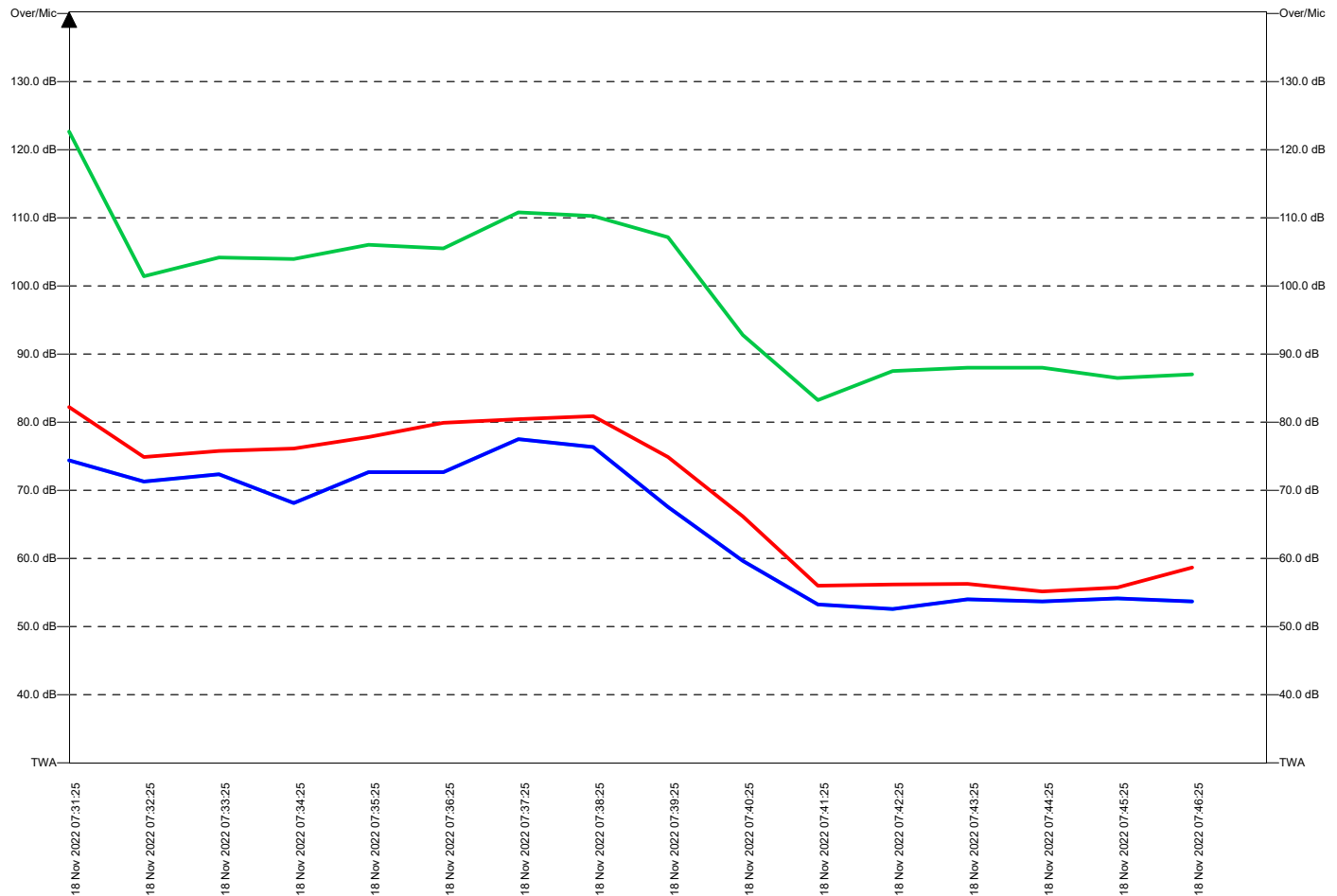


Serial Number:	17806	Start:	18 Nov 2022 07:31:25
Model Number:	706RC	Stop:	18 Nov 2022 07:47:25
RMS Weighting:	A Weighting	Run Time:	00:16:00
Peak Weighting:	Unweighted	Pre Calibration:	16 Nov 2022 10:43 12.80 dBA
Detector:	Slow	Post Calibration:	5 Dec 2022 08:48 12.80 dBA
Gain:	30 dB	Deviation:	0.0 dB
Sample Period:	60 seconds	Periods:	16

Exchange Rate:	3	Dose:	42.9 %
Threshold:	0.0 dBA	Projected Dose:	1286.3 %
Criterion Level:	60.0 dBA	Leq:	71.1 dBA
Criterion Duration:	8.0 hours	TWA:	71.1 dBA
		TWA (8):	56.3 dBA
L10:	75.5 dBA	Lmax:	82.1 dBA
L30:	71.5 dBA	Lpeak (max):	122.5 dB
L50:	57.5 dBA	SEA:	122.5 dB
L70:	53.5 dBA	Lep (8):	56.3 dBA
L90:	52.5 dBA	SE:	0.0 Pa ² hr

Note:

Time History

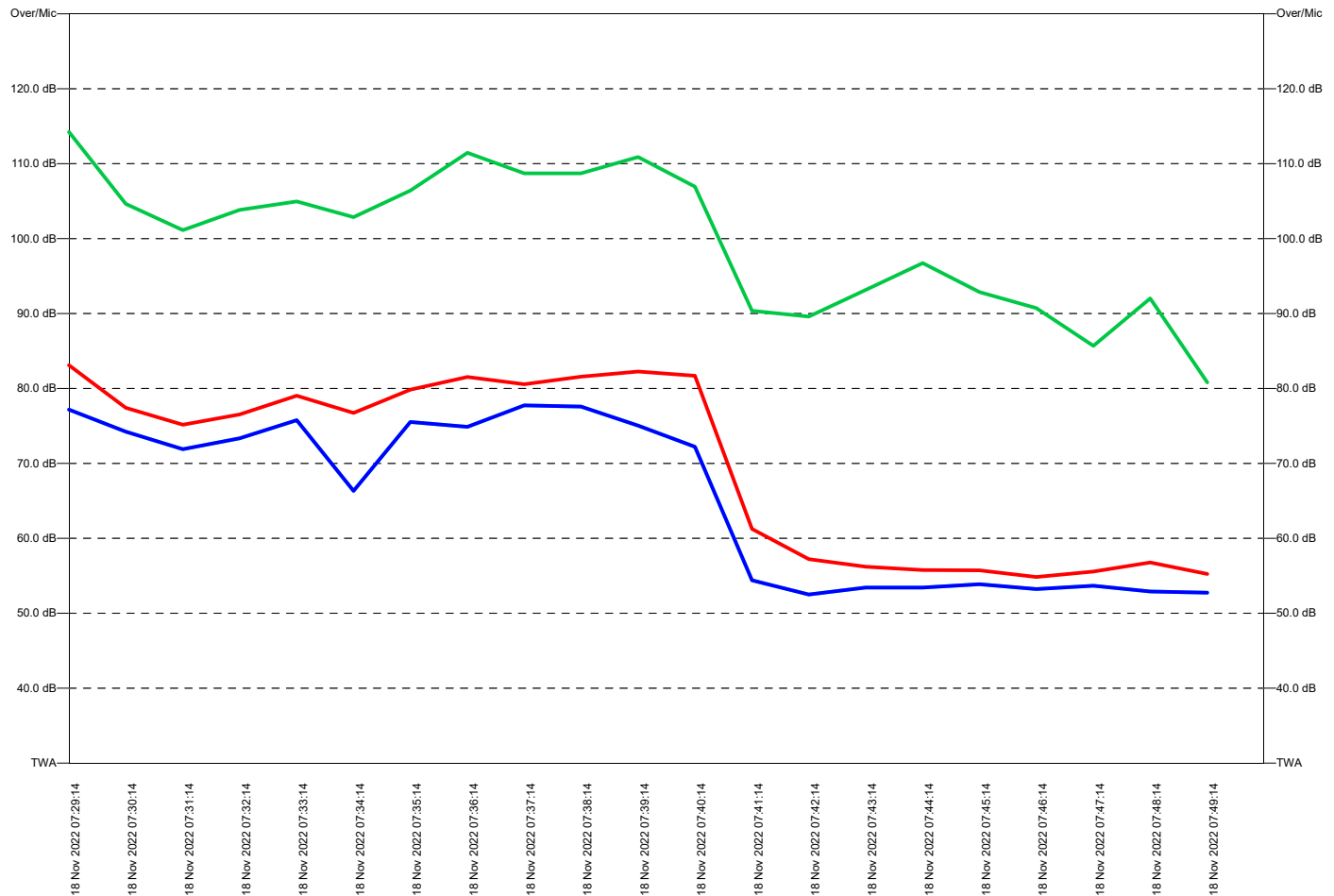


Serial Number:	02998	Start:	18 Nov 2022 07:29:14
Model Number:	706	Stop:	18 Nov 2022 07:50:14
RMS Weighting:	A Weighting	Run Time:	00:21:00
Peak Weighting:	Unweighted	Pre Calibration:	10 Nov 2022 09:25 13.30 dBA
Detector:	Slow	Post Calibration:	5 Dec 2022 08:33 13.10 dBA
Gain:	30 dB	Deviation:	-0.2 dB
Sample Period:	60 seconds	Periods:	21

Exchange Rate:	3	Dose:	81.9 %
Threshold:	0.0 dBA	Projected Dose:	1871.1 %
Criterion Level:	60.0 dBA	Leq:	72.7 dBA
Criterion Duration:	8.0 hours	TWA:	72.7 dBA
		TWA (8):	59.1 dBA
L10:	77.5 dBA	Lmax:	83.1 dBA
L30:	73.0 dBA	Lpeak (max):	114.3 dB
L50:	56.0 dBA	SEA:	--- dB
L70:	53.5 dBA	Lep (8):	59.1 dBA
L90:	52.0 dBA	SE:	0.0 Pa ² hr

Note:

Time History

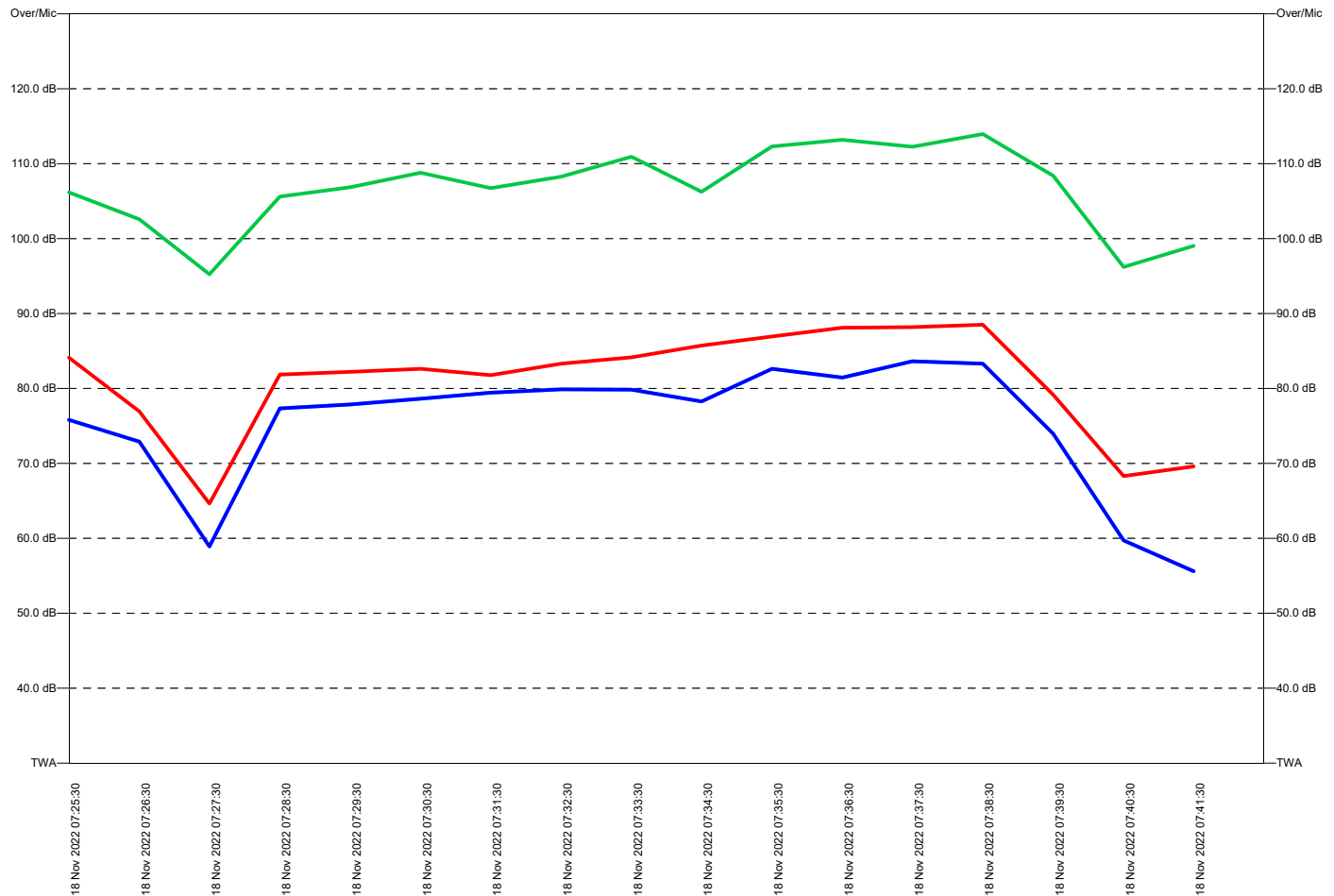


Serial Number:	02995	Start:	18 Nov 2022 07:25:30
Model Number:	706	Stop:	18 Nov 2022 07:42:30
RMS Weighting:	A Weighting	Run Time:	00:17:00
Peak Weighting:	Unweighted	Pre Calibration:	16 Nov 2022 10:50 12.80 dBA
Detector:	Slow	Post Calibration:	5 Dec 2022 08:28 12.90 dBA
Gain:	30 dB	Deviation:	0.1 dB
Sample Period:	60 seconds	Periods:	17

Exchange Rate:	3	Dose:	290.5 %
Threshold:	0.0 dBA	Projected Dose:	8201.9 %
Criterion Level:	60.0 dBA	Leq:	79.1 dBA
Criterion Duration:	8.0 hours	TWA:	79.1 dBA
		TWA (8):	64.6 dBA
L10:	83.0 dBA	Lmax:	88.5 dBA
L30:	80.0 dBA	Lpeak (max):	114.0 dB
L50:	74.5 dBA	SEA:	--- dB
L70:	61.0 dBA	Lep (8):	64.6 dBA
L90:	53.0 dBA	SE:	0.0 Pa ² hr

Note:

Time History

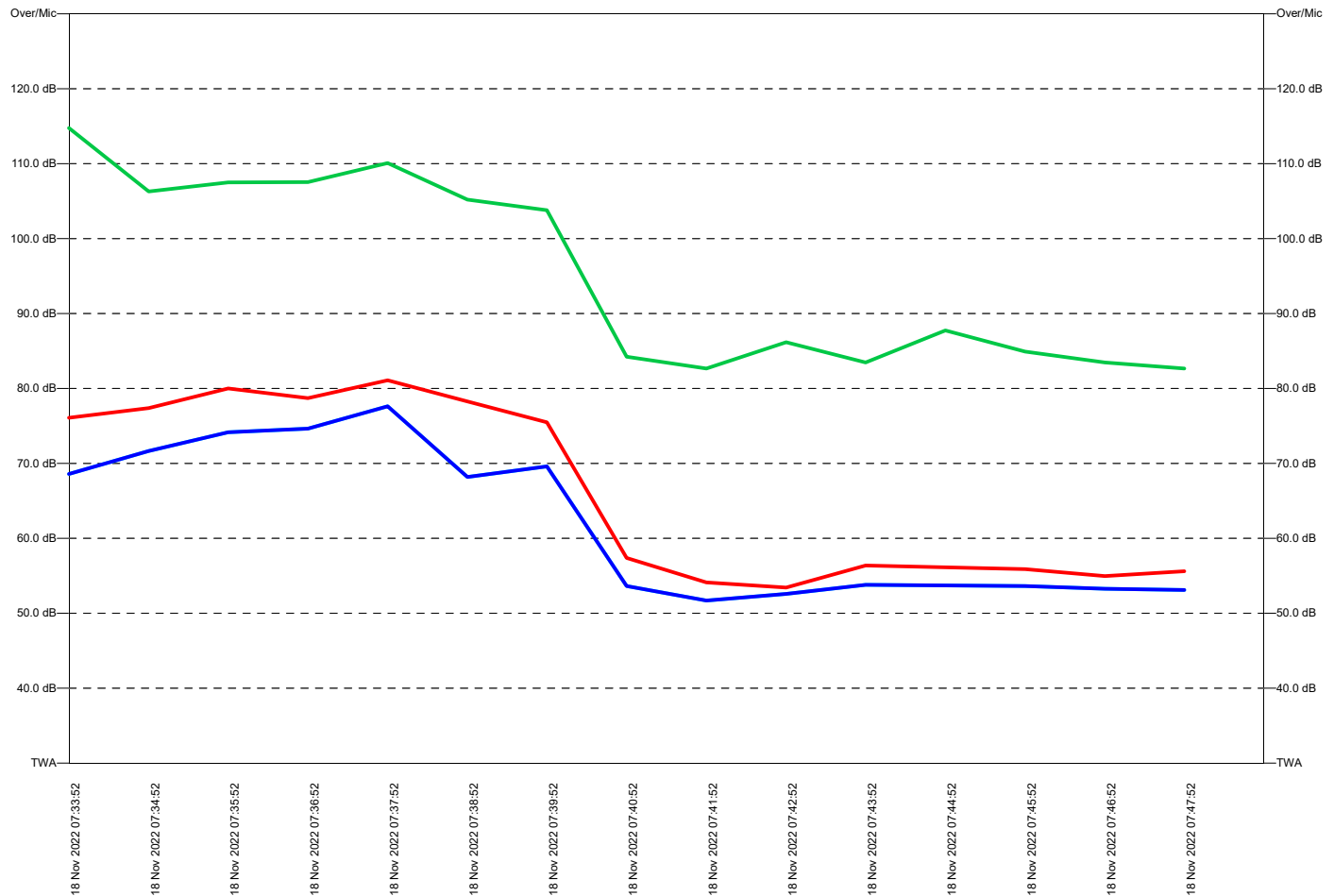


Serial Number:	02996	Start:	18 Nov 2022 07:33:52
Model Number:	706	Stop:	18 Nov 2022 07:48:52
RMS Weighting:	A Weighting	Run Time:	00:15:00
Peak Weighting:	Unweighted	Pre Calibration:	16 Nov 2022 10:48 13.20 dBA
Detector:	Slow	Post Calibration:	5 Dec 2022 08:30 13.30 dBA
Gain:	30 dB	Deviation:	0.1 dB
Sample Period:	60 seconds	Periods:	15

Exchange Rate:	3	Dose:	31.8 %
Threshold:	0.0 dBA	Projected Dose:	1018.6 %
Criterion Level:	60.0 dBA	Leq:	70.1 dBA
Criterion Duration:	8.0 hours	TWA:	70.1 dBA
		TWA (8):	55.0 dBA
L10:	75.5 dBA	Lmax:	81.1 dBA
L30:	66.0 dBA	Lpeak (max):	114.8 dB
L50:	54.0 dBA	SEA:	--- dB
L70:	53.0 dBA	Lep (8):	55.0 dBA
L90:	52.0 dBA	SE:	0.0 Pa ² hr

Note:

Time History



APPENDIX C – VMT Analysis & Trip Generation Memo





MEMORANDUM

Date:	January 2, 2023	GTS: 220509
To:	Eunice Bagwan, Chambers Group	
From:	Rawad Hani, GTS	
Subject:	Western High School Field Project Vehicle Miles Traveled (VMT) Analysis and Trip Generation	

This memorandum describes the vehicle miles traveled (VMT) screening analysis for the proposed Western High School Field Project (Project), in Anaheim, CA.

The Project consists of the construction of a new enclosed artificial turf field within existing school's athletic fields located at 501 S Western Avenue in the City of Anaheim.

The VMT analysis evaluated the project using the City of Anaheim VMT guidelines outlined in the June 2020 *City of Anaheim Traffic Impact Analysis Guidelines for California Environmental Quality Act* (Guidelines).

Analysis Background

On December 28, 2018, the California Office of Administrative Law cleared the revised California Environmental Quality Act (CEQA) guidelines for use. Among the changes to the guidelines was removal of vehicle delay and level of service from consideration under CEQA. With the adopted guidelines, transportation impacts are to be evaluated based on a project's effect on vehicle miles traveled (VMT).

Project Background

Western High School is located at 501 S Western Avenue, Anaheim, CA 92804 and is situated in a residential area surrounded by housing on all sides and places of worship to the south. The school accommodates students from Grade 9 -12. The site is approximately 39 acres in size and encompasses 11 permanent buildings and 13 relocatable/portable buildings.

The new artificial turf field at the existing football/soccer field is intended to provide a practice field for Western High School use. The Project includes an observational Press Box, high netting, a scoreboard, modular concession building with restroom facilities, portable tiered bleachers under new metal shade structures with lighting/cameras and wifi, field lighting, entry canopy, marquee, fencing, landscaping and access improvements. The upgraded facility will offer enhanced exterior learning opportunities and increased safety for sports and student assemblies.

The project will serve the current student population and is not intended to increase the student enrollment.

Trip Generation

The Institute of Transportation Engineers (ITE) *Trip Generation Manual* (most recent edition is 11th Edition, 2021) is typically utilized to estimate daily project trip generation. The Trip Generation Manual does not separately include trip generation data for school practice fields as these uses are typically incorporated in the trip generation rates for the school.

The daily trip generation for Western High School is presented in Table 1 for weekday and weekend. The number of students of 1,942 is used for these calculations as per the California Department of Education enrollment figures.

Table 1. Western High School Trip Generation

Land Use	ITE Land Use Code	Units	Weekday		Saturday ²	
			Rate	Estimated Trips	Rate	Estimated Trips
High School	525	Students ¹	1.94 per Student	3,767	0.68 per Student	1,321
Net New Trips				0		0

1. Enrollment is 1,942 per California Department of Education (<https://www.cde.ca.gov/sdprofile/details.aspx?cds=30664313038239>)

2. Saturday Rates are reported as they are typically higher (more conservative) than Sundays. Sunday rate is 0.25 versus 0.68 for Saturday

As the Project will serve the current student population and is not intended to increase the student enrollment, the project will not generate net new trips. The trips on Saturdays, Sundays, as well as weekday PM peak hours are typically associated with sports practice, games, and other after school activities.

The district reported that there is an existing joint-use agreement with the City regarding field use where the fields could be rented out for private groups when they are not being used by the school. However, trips for those private events renting the school facilities are local trips and considered as diverted trips from other sites and not net new trips (that is events that would have taken place in other locations within the City).

VMT Screening Analysis

Pursuant to SB 743 technical guidance published by OPR and *The City of Anaheim Traffic Impact Analysis Guidelines for California Environmental Quality Act* (June 2020), there are several screening procedures to potentially streamline project analysis (i.e., provide a presumptive non-impact finding and remove the need for a VMT analysis). Prime among these are local-serving K-12 schools that can be presumed to have a less than significant transportation impact as well as project generating less than 110 daily trips.

The Project at hand satisfies both criteria being a school with grades 9-12 school as well as generating less than 110 net new trips.

Therefore, based on the VMT screening criteria, the proposed Project represents a less than significant transportation impact based on VMT and no further VMT analysis is required.

Conclusion

Based on the VMT analysis as shown above, the project doesn't constitute a significant impact for VMT.