

5. Environmental Analysis

5.11 LAND USE AND PLANNING

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential impacts to land use in the City of Brea from implementation of the proposed Brea 265 Specific Plan. Land use impacts can be either direct or indirect. Direct impacts are those that result in land use incompatibilities, division of neighborhoods or communities, or interference with other land use plans, including habitat or wildlife conservation plans. This section focuses on direct land use impacts. Indirect impacts are secondary effects resulting from land use policy implementation, such as an increase in demand for public utilities or services or increased traffic on roadways. Indirect impacts are addressed in other sections of this DEIR.

5.11.1 Environmental Setting

5.11.1.1 REGULATORY BACKGROUND

Regional Regulations

Southern California Association of Governments

SCAG is a council of governments representing Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. SCAG is the federally recognized metropolitan planning organization (MPO) for this region, which encompasses over 38,000 square miles. SCAG is a regional planning agency and a forum for addressing regional issues concerning transportation, the economy, community development, and the environment. SCAG is also the regional clearinghouse for projects requiring environmental documentation under federal and state law. In this role, SCAG reviews proposed development and infrastructure projects to analyze their impacts on regional planning programs. As the southern California region's MPO, SCAG cooperates with the South Coast Air Quality Management District, the California Department of Transportation, and other agencies in preparing regional planning documents. SCAG has developed regional plans to achieve specific regional objectives. The plans most applicable to the proposed project are discussed below.

Regional Transportation Plan/Sustainable Communities Strategy

The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), "Connect SoCal," was adopted in September 2020. Connect SoCal embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions, tribal governments, nonprofit organizations, businesses, and local stakeholders in the member counties. Connect SoCal is a long-range visioning plan that balances future mobility and housing needs with economic, environmental and public health goals. It builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies, and between the people whose collaboration can improve the quality of life for residents of southern Californians. Connect SoCal outlines over 4,000 transportation projects through 2045—highway improvements, railroad grade separations, bicycle lanes, new transit hubs, replacement bridges, etc. In addition, Connect SoCal is supported by a combination of transportation and land use strategies that outline how the region can achieve California's greenhouse gas emission reduction goals and federal Clean Air Act

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requirements. The plan also strives to achieve broader regional objectives, such as the preservation of natural lands, improvement of public health, increased roadway safety, support for the region's vital goods movement industries, and more efficient use of resources.

Local Regulations

Approximately 219.1 acres of the project site are within unincorporated Orange County in the City of Brea's sphere of influence. Approximately 43 acres of the project site is in the City of Brea.

Orange County General Plan

The unincorporated portion of the project site has the land use designations: 1B (Suburban Residential), 4 (Public Facilities), and 5 (Open Space) (Orange County 2015). Suburban Residential allows for a wide range of housing types, up to 0.5 to 18.0 dwelling units per acre, and 1 to 47 persons per acre. Public Facilities allows for major facilities built and maintained for public use and allows for a range of intensity and density, depending on the use. The Open Space land use designation provides for limited land uses that do not require a commitment of significant urban infrastructure. The General Plan states that

Open Space (5) areas are not necessarily committed to permanent open space uses. Certain property within the Open Space categories is committed, through public or private ownership, to remain as open space, but other property, due to market pressures to serve a growing County population may ultimately be developed in other ways. (Brea 2003, p. III-21).

Within the Open Space designation, buildings and structures should not exceed 20 percent of site coverage. The Open Space designation allows for approximately 9 employees per acre.

Orange County Code

The unincorporated portion of the project site is currently zoned A1(O), General Agriculture, with an oil production overlay (Orange County 2016). The General Agriculture zone allows for principal permitted uses including agriculture, community care facilities, parks/playgrounds/athletic fields, and single-family dwellings or mobile homes. Other uses are permitted with a site development permit and use permit. The oil production overlay zone permits oil drilling and production of oil, gas, and other hydrocarbon substances.

The southern portion of the project site adjacent to the Carbon Canyon Dam is in a FP-2 (Flood Plain 2) overlay zone. Pursuant to Orange County Code section 7-9-113.3(a)(2), the FP-2 applies to areas shown as "A," "A1" through "A30," "AO," "AE," "AH," "A99," and "M" on the December 3, 2009, or most current federal Flood Insurance Rate Maps (FIRMs) and Flood Hazard Boundary Maps (FHBMs) and to areas that the County has determined to be a special flood hazard area. Section 7-9-113 identifies permitted uses and regulations for floodplain areas.

City of Brea General Plan

The State of California mandates that every city adopt a comprehensive long-range plan that guides physical development and regulates land use. The City of Brea General Plan addresses the City's vision for and growth into the future. The General Plan guides future decision making about development, resource management,

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public safety, and community well-being. The General Plan addresses lands within the City and within its sphere of influence.

Existing City of Brea General Plan Designations

The eastern and western sides of the project site currently have a General Plan land use designation of Hillside Residential and Low Density Residential, respectively (see Figure 3-7, *Existing and Proposed General Plan Land Use Map*). The eastern side of the project site contains land within the City and unincorporated Orange County. The western side of the project site contains land in the City's sphere of influence.

The Hillside Residential land use designation allows for permitted uses, including detached single-family residences and ancillary uses, limited commercial recreational uses with discretionary review, places for religious worship (with discretionary review), public schools, group homes, and public and private hiking trails and related facilities. Permitted dwelling unit densities are calculated based on a three-step approach (described in Brea's General Plan p. 2-19), which includes determining averages slope, constraints and opportunities, and conformance to performance criteria.

The Low Density Residential land use designation permits low-density single-family dwellings and accessory buildings. Permitted dwelling unit density is between 1 to 6 dwelling units per acre and population density is approximately 16 persons per acre.

Goals and Policies

Four overarching goals guide Brea's General Plan:

- **Goal 1:** Create an inclusive community that strives to meet the needs of residents of all ages, income levels, occupations, family types, and lifestyles.
- **Goal 2:** Plan for the sustainable stewardship of natural resources.
- **Goal 3:** Provide a range of mobility options that reduce dependence on the automobile.
- **Goal 4:** Maintain a sustainable economic base to provide a solid fiscal foundation and diverse employment opportunities, and to ensure the provision of quality community facilities and services.

To implement these goals, the General Plan has five chapters, or elements: Community Development, Housing, Community Resources, Community Services, and Public Safety. These elements conform to the state's mandated elements. The Community Development and Housing elements closely relate to land use and are discussed in this chapter.

Community Development Element

The land use section of the Community Development Element defines the distribution of land uses and the intensity of development. It provides goals and policies that are used to guide implementation of land use objectives that provide for the present and future population.

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- **Policy CD-1.1.** Create neighborhoods that effectively integrate single-family and multi-family housing with convenience and neighborhood shopping centers, park and recreation areas, and other uses appropriate for the neighborhoods
- **Policy CD-1.2.** Maintain a land use structure that balances the provision of jobs and housing with available infrastructure and public and human services.
- **Policy CD-1.4.** Ensure that the City maintains a balance among residential, commercial, and industrial land uses.
- **Policy CD-1.5.** Provide opportunities for development of housing that responds to diverse community needs in terms of density, size, location, design, and cost.
- **Policy CD-1.9.** Encourage new development that is organized around compact, walkable, mixed-use neighborhoods and districts to conserve open space resources, minimize infrastructure costs, and reduce reliance on the automobile.
- **Policy CD-1.10.** Preserve open space wherever possible, especially in hillside areas.
- **Policy CD-1.15.** Strongly encourage the master planning of any large contiguous land holdings.
- **Policy CD-1.15 [sic].** Strongly encourage the rezoning and annexation of unincorporated properties in the City of Brea in order to avoid the creation of new County islands.
- **Policy CD-4.2.** Improve transportation, pedestrian, and visual connections between Brea Downtown and the rest of the community.
- **Policy CD-9.1.** Ensure that new commercial uses complement rather than compete with businesses along Imperial Highway and in Downtown.
- **Policy CD-9.2.** Accommodate emerging housing trends, and encourage pedestrian linkage to surrounding neighborhoods and activity centers.
- **Policy CD-9.3.** Encourage the establishment of community recreation and park facilities in the area.
- **Policy CD-9.4.** Support efforts to establish quality, community institutions in the area.
- **Policy CD-9.5.** Provide quality, affordable housing that would accommodate young families, college students, and educators.
- **Policy CD-9.6.** Preserve open space within this area, and provide outdoor recreation facilities.
- **Policy CD-9.7.** Strongly encourage the master planning of any large contiguous land holdings in this area.

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- **Policy CD-9.8.** Strongly encourage the rezoning and annexation of the unincorporated properties in this area into the City the Brea in order to avoid the creation of new County islands.

Housing Element

The Housing Element identifies strategies and programs that focus on the conservation and improvement of existing affordable housing; the provisions of adequate housing sites; assistance in the development of affordable housing; removal of governmental and other constraints to housing development; promotion of equal housing opportunities; and promotion of sustainability and energy efficiency.

- **Policy 2.1. Financial Resources** – Pursue expanded financial resources to support in the production of housing affordable to Brea’s workforce, disadvantaged communities, and special needs populations.
- **Policy 2.2. Mixed Income Housing** – Utilize the City’s Inclusionary Housing Ordinance as a tool to integrate affordable units within market rate developments, or pay an in-lieu fee to support the provision of affordable housing.
- **Policy 2.3. Provide Homeownership Assistance** – Encourage the provision of financial assistance to low and moderate first-time homebuyers through County and State programs.
- **Policy 2.4. Housing for Workforce** – Promote the City’s Affordable Housing Programs with employers in Brea.
- **Policy 2.5. Public/Private Partnerships** – Explore collaborative partnerships with major employers, educational institutions, non-profit organizations, and others in the provision of affordable, workforce and special needs housing.
- **Policy 3.6. Hillside Development** – Base densities in Brea’s hillsides on the ability of infrastructure, ingress and egress for evacuations, landform, physical constraints, and emergency response capabilities to support development.
- **Policy 3.7. Annexations** – Pursue phased annexation of Brea’s Sphere of Influence to provide additional growth opportunities for a range of housing types consistent with infrastructure capacities.
- **Policy 6.5. Transportation Alternatives and Walkability** – Incorporate transit and other transportation alternatives including walking and bicycling into the design of new development, particularly in areas within a half-mile of designated transit stops and the City’s “Tracks at Brea” walking and biking trail system.
- **Policy 6.6. Jobs/Housing Balance** – Encourage a closer link between housing and jobs in the community, including housing opportunities affordable to Brea’s modest income workforce.

City of Brea Municipal Code

The City of Brea Zoning Ordinance, Title 20 of the Brea Municipal Code, is designed to encourage the most appropriate use of land and to facilitate adequate provision for community facilities and utilities. Section

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20.04.010 of the municipal code establishes zones for allowable uses. Zoning designations are identified for areas in the city and its sphere of influence. The eastern portion of the project site is currently zoned HR, Hillside Residential, and the western portion of the portion of the project site is currently zoned R-1, Single-Family Residential (see Figure 3-8, *Existing and Proposed Zoning*). These designations apply to the portions of the project site in Brea and the sphere of influence.

Chapter 20.206, HR Hillside Residential Zone, indicates that the purpose of the HR zone is to achieve the City's objective to facilitate and permit the orderly development of property within the hillside areas through a set of hillside development standards aimed at protecting the public health, safety, and welfare; protecting and preserving natural and biological resources for the long-term benefit of the Brea community and the broader community; recognizing the inherent value in the properties subject to this chapter; allowing size, type, location, density, and intensity of development based on available infrastructure, the geographic steepness of terrain, presence of unique geographic conditions and constraints, and presence of environmentally sensitive areas; and optimizing the use of sensitive site design, grading, landscape architecture, and architecture, all to achieve the City's objectives.

Chapter 20.208, R-1 Single Family Residential Zone, indicates that the purpose of the R-1 zone is to provide an environment conducive to the development of single-family homes with no mixed or incompatible uses.

5.11.1.2 EXISTING CONDITIONS

The project site is south of Carbon Canyon Road, north and south of Lamber Road, east and west of Valencia Avenue, east of Rose Drive, and west of Carbon Canyon Regional Park. The Specific Plan area is bisected by Valencia Avenue, which runs north-south, and by Lambert Road, which runs east-west. The project site is an active oil operations site operated by Aera Energy, except for the southern agricultural area and the northwestern portion that operates as a nursery. There is no public access to the project site.

The project site has been used for oil production continuously since the early 1900s. Of the approximately 190 wells drilled on the site, 68 remain in operation and produce approximately 400 barrels per day. The 167.6 acres east of Valencia Avenue slope down from northeast to southwest, with more than 150 feet of elevation change. The 94.5 acres west of Valencia Avenue slope from north to south, with an average slope of about 3 percent. Most of the Specific Plan area is considered flat because it falls into the 0 to 10 percent slope range, with elevations gradually increasing in the northeastern portions of the site. A hilltop in the northeastern portion of the project site provides views of surrounding terrain.

5.11.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- LU-1 Physically divide an established community.
- LU-2 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.

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5.11.3 Plans, Programs, and Policies

There are no existing plans, programs, and policies applicable to the proposed project.

5.11.4 Environmental Impacts

The following impact analysis addresses the thresholds of significance; the applicable thresholds are identified in brackets after the impact statement.

Impact 5.11-1: Project implementation would not divide an established community. [Threshold LU-1]

The project site is being used for oil production, agricultural, and nursery uses, and Valencia Avenue and Lambert Road also run across the project site, separating the project site into east and west areas. There is no established community within the project site, and various land uses surround the project site, such as residential, school, open space, industrial, and vacant lots. Therefore, the proposed project would not physically divide an established community, and no impact is anticipated.

Level of Significance Before Mitigation: No impact.

Impact 5.11-2: Project implementation would not conflict with applicable plans adopted for the purpose of avoiding or mitigating an environmental effect. [Threshold LU-2]

This section discusses the proposed project’s consistency with applicable regional and local plans that are adopted for the purpose of avoiding or mitigating an environment effect.

2020–2045 RTP/SCS: Connect SoCal

Connect SoCal is a long-range visioning plan that balances future mobility and housing needs with economic, environmental and public health goals. The proposed project would develop a residential community that integrates bicycle paths, sidewalks, and trails within the site that would connect to existing pedestrian facilities in the surrounding community, thereby promote connectivity and walkability in a community that needs more housing. Table 5.11-1 evaluates the proposed project’s consistency with applicable RTP/SCS goals.

Table 5.11-1 SCAG’s Connect SoCal Consistency Analysis

Goals	Consistency Analysis
<ul style="list-style-type: none"> ▪ RTP/SCS G1: Encourage regional economic prosperity and global competitiveness. 	<p>Consistent. As discussed in the DEIR Section 5.14, <i>Population and Housing</i>, the proposed project would improve the existing jobs and housing imbalance from 2.98 (2020) without project condition to 2.80 with project condition. Recommended jobs-housing ratio is between 1.3 and 1.7, and Brea is a jobs-rich community needing more housing development. The RHNA allocation for the City for 2021-2029 housing-element cycle is 2,365 units. Development of 1,100 dwelling units would contribute to improving the job-housing balance in Brea and the region’s housing shortage. Its diverse housing options, including affordable housing, is important to the economic prosperity of the city and region. Therefore, 1,100 units, including 76 affordable units, would contribute to attracting skilled workers and encouraging regional economic development and competitiveness.</p>

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Table 5.11-1 SCAG's Connect SoCal Consistency Analysis

Goals	Consistency Analysis
<ul style="list-style-type: none"> ▪ RTP/SCS G2: Improve mobility, accessibility, reliability, and travel safety for people and goods. 	<p>Consistent. The proposed project includes travel lane improvements and pedestrian improvements within and around the project site. The proposed project would improve Carbon Canyon Road/Lambert Road, Valencia Avenue, and Rose Drive. The south side of Carbon Canyon Road would be improved to Major Highway Standard with three travel lanes; Lambert Road would be improved to Major Arterial Highway Standards with three travel lanes in each direction; and the east side of Rose Drive would be improved to Primary Highway with two travel lanes (instead of one). In addition, the proposed project includes pedestrian and bicycle improvements along roadways bordering the project site. The proposed project would develop bikeways and trails that would connect to existing bikeways and trails surrounding the project site. All roadway improvements and pedestrian facilities would be designed to meet applicable standards. Although the proposed project would increase trips generated in the project site, the proposed project would improve the jobs-housing balance in a jobs-rich city by providing housing and roadway improvements that meet the General Plan roadway designations. The roadway improvements would help maximize mobility, accessibility, reliability, and travel safety for all people and goods.</p>
<ul style="list-style-type: none"> ▪ RTP/SCS G3: Enhance the preservation, security, and resilience of the regional transportation system. 	<p>Not Applicable. As discussed in RTP/SCS G2, the proposed project includes roadway improvements that meet the designated roadway classifications and design standards of the City's Circulation Element. However, the proposed project is not a transportation project that could enhance the preservation, security, and resilience of the regional transportation system. This goal is not applicable.</p>
<ul style="list-style-type: none"> ▪ RTP/SCS G4: Increase person and goods movement and travel choices within the transportation system. 	<p>Consistent: See RTP/SCS G2.</p>
<ul style="list-style-type: none"> ▪ RTP/SCS G5: Reduce greenhouse gas emissions and improve air quality. 	<p>Inconsistent. Long-term emissions generated by the proposed project would not produce criteria air pollutants that exceed the South Coast AQMD's significance thresholds for project operations with mitigation, except for long-term VOC emissions that would exceed the threshold even with mitigation. The proposed project would also exceed South Coast AQMD's threshold for GHG emissions even with mitigation. The proposed project's construction impact would be reduced to a less than significant level with implementation of mitigation measures described in Section 5.3, <i>Air Quality</i>. Although the proposed project would provide needed housing development in a jobs-rich city and would help fulfill the City's RHNA allocation, the proposed project would not reduce GHG emissions and improve air quality. The proposed project is inconsistent with this goal.</p>
<ul style="list-style-type: none"> ▪ RTP/SCS G6: Support healthy and equitable communities. 	<p>Consistent: The proposed project includes a 13-acre sports park immediately north of the existing Brea Sports Park with various amenities such as a baseball field, tennis courts, soccer field, pickleball courts, a full basketball court, tartan track with fitness stations, innovative play area, shade structure, concession stand (approx. 900 square feet), restrooms with drinking fountain and bike racks, team warmup field, and parking. A 2.1-acre Staging Area park would allow residents to access neighboring Carbon Canyon Regional Park and Chino Hills State Park as well as other areas of the community through multiple routes. These recreation opportunities would be open to public, not just the residents of the Specific Plan.</p> <p>The proposed project also includes pedestrian and bicycle improvements along roadways bordering the project site. The proposed system of bikeways, trails, and sidewalks would link neighborhoods to key amenities and open space areas in the project site and connect to existing bikeways and trails surrounding the project site, including Brea Sports Park, Carbon Canyon Regional Park, and Chino Hills State Park. The proposed project would also connect to The Tracks at Brea Trail, linking the project site to the Town Center, employment center, Birch Hills Golf Course, and Downtown Brea. The provision of these various recreational and open space opportunities is consistent with the goal of supporting healthy and equitable communities.</p>

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Table 5.11-1 SCAG’s Connect SoCal Consistency Analysis

Goals	Consistency Analysis
<ul style="list-style-type: none"> ▪ RTP/SCS G7: Adapt to a changing climate and support an integrated regional development pattern and transportation network. 	<p>Consistent: The proposed project includes roadway, bikeways, and pedestrian improvements that connect to the existing roadways, bikeways, and trails surrounding the project site; therefore, the proposed project would integrate into the existing transportation network. There are existing commercial, office, educational, and recreational uses that surround the project site, and development of the proposed project would place needed housing products in close proximity to existing nonresidential development so that VMT for the project can be minimized. As discussed in Section 5.17, <i>Transportation</i>, project-generated VMT per service population would be lower than Brea’s VMT per service population for the corresponding traffic analysis zones.</p>
<ul style="list-style-type: none"> ▪ RTP/SCS G8: Leveraging new transportation technologies and data-driven solutions that result in more efficient travel. 	<p>Consistent: The proposed roadway improvements, including new signalized intersections and modified existing signalized intersections, would be provided based on the Manual on Uniform Traffic Control Devices and incorporate transportation technologies and data-driven solutions to achieve more efficient travel.</p>
<ul style="list-style-type: none"> ▪ RTP/SCS G9: Encourage development of diverse housing types in areas that are supported by multiple transportation options. 	<p>Consistent. The proposed project would provide up to 450 low-density units and 650 medium-density units—a total of 1,100 units with an overall average density of 4.2 dwelling units per acre. The total of 1,100 units would also include 76 affordable housing units. The proposed project also provides multiple transportation options by providing roadways, sidewalks, bikeways, and trails on site. The on-site mobility systems would connect to existing pedestrian, bicycle, and trail networks across the city and open the project site to public access. The proposed project includes pedestrian and bicycle improvements, including bikeways and trails along Carbon Canyon Road, Lambert Road, Rose Drive, and Valencia Avenue. Therefore, the project site supports multiple transportation options, and development of 1,100 housing units would add to the city’s housing stock, diversifying the housing types in the city.</p>
<ul style="list-style-type: none"> ▪ RTP/SCS G10: Promote conservation of natural and agricultural lands and restoration of habitats. 	<p>Consistent: The project site contains agricultural fields and operations and 4.61 acres of nursery. The remaining areas consist of various biological resources habitats such as coastal sage scrub habitat, chaparral habitat, etc. The project site also contains a total of 39.65 acres of special status farmland, as discussed in Section 5.2, <i>Agriculture and Forestry Resources</i>. However, the project site is currently zoned R-1 Single-Family Residential and HR Hillside Residential, and although the proposed project would remove the existing biological habitats and impact sensitive plants and wildlife species, adequate mitigation measures have been provided, as discussed in Section 5.4, <i>Biological Resources</i>, to reduce potential impacts to less than significant level. The mitigation measure includes providing 70.65 acres of open space land for preservation adjacent to Chino Hills State Park. Therefore, the proposed project would promote restoration of habitats.</p>

Source: SCAG 2020.

City of Brea General Plan

A detailed analysis of the proposed project’s consistency with the applicable goals and policies of the City’s General Plan is provided in Table 5.11-2, *Consistency with General Plan Goals and Policies*. In accordance with the holding in *Sierra Club v. County of Napa*, 121 Cal. App.4th 1490 (2004),

... [a] project is consistent with a county’s general plan (and any specific plan adopted to further the objectives of the general plan) “if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment.” [Endangered Habitats League, Inc. v. County of Orange (2005) 131 Cal. App.4th 77, 782.] A given project need not be in perfect conformity with each and every general plan policy. To be consistent, a [project] must be ‘compatible with’ the objectives, policies, general land uses and programs specified in the general plan.

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Therefore, consistent with the holding in *Sierra Club v. County of Napa*, Table 5.11-2 analyzes why the proposed project is consistent (i.e., “compatible”) or inconsistent with the City of Brea General Plan, and how it would help implement and further various goals and policies of the General Plan.

Table 5.11-2 Consistency with General Plan Goals and Policies

Relevant Goals and Policies	Compliance Analysis
Overarching General Plan Goals	
<p>GOAL 1: Create an inclusive community that strives to meet the needs of residents of all ages, income levels, occupations, family types, and lifestyles.</p>	<p>Consistent. The Brea 265 Specific Plan would contribute to creating an inclusive community with varying housing types, providing up to 450 low-density units and 650 medium-density units (including 76 affordable housing units) with an overall average density of 4.2 dwelling units per acre as well as park/ recreational area and open space. The proposed project includes a 13-acre sports park with various amenities and a 2.1-acre Staging Area park that would be open to public to meet the needs of residents of all ages., income levels, occupations, family types, and lifestyles. Further, the proposed project would create a walkable community with open space and recreational opportunities that would connect to publicly accessible trails, parks, and open space. The proposed project’s varying housing types, recreation/open space, and active connectivity would support an inclusive community environment.</p>
<p>GOAL 2: Plan for the sustainable stewardship of natural resources.</p>	<p>Consistent. The Brea 265 Specific Plan incorporates a sustainable community design and development, including compact development, reduced impervious surfaces, improved water detention and conservation, and improved active transportation amenities that would conserve energy and water and preserve open space. Approximately 23 percent of the project site would be reserved for open space and parks/recreational space—47.5 acres of open space and 15.1 acres of parks/recreational space. Additionally, as part of mitigation for biological resources, the project applicant would be required to provide a minimum of 52.86 acres of open space offsite within or adjacent to the Chino Hills State Park.</p>
<p>GOAL 3: Provide a range of mobility options that reduce dependence on the automobile.</p>	<p>Consistent. The Brea 265 Specific Plan promotes active transportation (such as walking and bicycling) by incorporating sidewalks, trails, and landscaped parkways between the project site’s land uses that also provide access to public and common use areas. These pathways would further connect to the greater Brea community and nearby parks, including Brea Sports Park, Carbon Canyon Regional Park, and Chino Hills State Park. The proposed project also incorporates public right-of-way improvements, such as bicycle lanes and trails along Carbon Canyon Road, Lambert Road, Valencia Avenue, and Rose Drive that would promote active forms of transportation and connect to existing bikeways and pedestrian paths.</p> <p>Development of the Brea 265 Specific Plan would further place residents within walking distance to public parks and recreational facilities, commercial and office opportunities, and the Olinda Elementary School.</p>
<p>GOAL 4: Maintain a sustainable economic base to provide a solid fiscal foundation and diverse employment opportunities, and to ensure the provision of quality community facilities and services.</p>	<p>Consistent. The proposed project would contribute to a sustainable economic base by providing short-term construction jobs during the buildout of the Brea 265 Specific Plan and by providing housing for employees that work in the area.</p>
Community Development Element	
<p>GOAL CD-1: Provide a balance of land uses to meet the present and future needs of all residents.</p>	<p>Consistent: The Brea 265 Specific Plan would provide 1,100 housing units in an area previously used for oil production. The housing units would consist of single-family homes, detached cluster homes, townhomes, and apartments, including affordable housing units, to meet the diverse need of the community. The Specific Plan would also integrate a comprehensive walking and biking trail system that provides physical and visual connections to enhance walkability, linking neighborhoods to key amenities and open space areas within Brea 265 and to the</p>

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Table 5.11-2 Consistency with General Plan Goals and Policies

Relevant Goals and Policies	Compliance Analysis
	<p>existing trails in the greater Brea community and nearby Brea Sports Park, Carbon Canyon Regional Park, and Chino Hills State Park. As discussed in DEIR Section 5.14, <i>Population and Housing</i>, the proposed project is part of the planned growth for the city, would improve the existing jobs and housing balance from 2.98 under the existing condition (2020) to 2.80 with existing plus project condition. SCAG forecasts that the City's jobs-housing ratio would be 3.05 in 2045, improving from 3.14 in 2016. The recommended jobs-housing ratio is between 1.3 and 1.7, and Brea is now and is projected to be jobs-rich, needing more housing development. Provision of additional housing would promote balanced land uses in the city. The proposed project would also include a 13-acre park adjacent to the existing Brea Sports Park with various amenities, meeting recreational needs of Brea residents. Although no commercial uses are included in the proposed project, it places residences approximately 0.55 mile north of the Village at La Floresta, a commercial retail center. Provision of a diverse supply of housing in the city would also support preservation of employment centers and businesses, thereby contributing to providing a balance of land uses in the city.</p>
<ul style="list-style-type: none"> ▪ Policy CD-1.1. Create neighborhoods that effectively integrate single-family and multi-family housing with convenience and neighborhood shopping centers, park and recreation areas, and other uses appropriate for the neighborhoods. 	<p>Consistent. The Brea 265 Specific Plan would create an integrated community of 1,100 dwelling units that would consist of single-family detached homes, detached cluster homes, townhomes, attached motorcourt homes, and multifamily units. Pedestrian walking paths, bicycle paths, and trails with a system of open space, sports park, and recreational amenities would link various neighborhoods in the Specific Plan. These bicycle paths and trails would provide strong connections within the Specific Plan and to the greater Brea community, such as Chino Hills State Park, Carbon Canyon Regional Park, Olinda Elementary School, Brea Sports Park, Downtown Brea, and employment centers.</p>
<ul style="list-style-type: none"> ▪ Policy CD-1.2. Maintain a land use structure that balances the provision of jobs and housing with available infrastructure and public and human services. 	<p>Consistent. As discussed under Goal CD-1, Brea is now and is projected to be jobs-rich, needing more housing development. The buildout of the Specific Plan would include 1,100 dwelling units of low- and medium-density residential units with a target density of 4.2 dwelling units per acre. Development of housing units in a jobs-rich community would contribute to the balance of jobs and housing with adequate infrastructure and services.</p> <p>As discussed in Section 5.15, <i>Public Services</i>, the proposed project would result in a less than significant impact to public services with mitigation. As discussed in Section 5.19, <i>Utilities and Services Systems</i>, the proposed project would result in a less than significant impact to utilities with mitigation. Therefore, the proposed project would not exacerbate existing deficits in infrastructure and human services and would help maintain a balance of jobs and housing with infrastructure and public and human services.</p>
<ul style="list-style-type: none"> ▪ Policy CD-1.3. Endeavor to create a mixture of employment opportunities for all economic levels of citizens. 	<p>Consistent. The proposed project would create construction jobs, creating employment opportunities for all economic levels of citizens.</p> <p>As discussed under Goal CD-1, Brea is now and is projected to be jobs-rich, needing more housing development. The buildout of the Specific Plan would include 1,100 dwelling units of low- and medium-density residential units, with a target density of 4.2 dwelling units per acre. The proposed project could provide housing for employees that work in Brea.</p>
<ul style="list-style-type: none"> ▪ Policy CD-1.4. Ensure that the City maintains a balance among residential, commercial, and industrial land uses. 	<p>Consistent. As discussed under Goal CD-1, Brea is now and is projected to be jobs-rich, needing more housing development. Though the site is currently used for oil extraction and agriculture, the project site is zoned Hillside Residential and Single-Family Residential. The proposed project would contribute to the residential, commercial, and industrial land use balance.</p>
<ul style="list-style-type: none"> ▪ Policy CD-1.5. Provide opportunities for development of housing that responds to diverse 	<p>Consistent. The Brea 265 Specific Plan would allow for 1,100 dwelling units consisting of low- and medium-density residential units with a target density of 4.2</p>

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<p>community needs in terms of density, size, location, design, and cost.</p>	<p>dwelling units per acre. The proposed project would contribute a variety of housing options to the housing stock in Brea, including 76 affordable housing units.</p>
<ul style="list-style-type: none"> ▪ Policy CD-1.7. Create and maintain linked open spaces and pedestrian access that serve the entire community. ▪ Policy CD-1.8. Connect, where possible, all neighborhoods of the community and surrounding areas located with the City and Sphere of Influence with greenways and well-planned, well-located park areas. Maximize connections to hillside and open space areas. ▪ Policy CD-1.9. Encourage new development that is organized around compact, walkable, mixed-use neighborhoods and districts to conserve open space resources, minimize infrastructure costs, and reduce reliance on the automobile. ▪ Policy CD-1.10. Preserve open space wherever possible, especially in the hillside areas. 	<p>Consistent. The Brea 265 Specific Plan encourages compact development and sets aside hillside area as open space. The proposed project would provide 47.5 acres of open space and 15.1 acres of parks/recreational space. Sidewalks, bicycle lanes, and trails would connect the open space areas and parks/recreational spaces within the project site and to the surrounding community.</p> <p>The proposed project would further improve existing public rights-of-way with landscaping, bicycle lanes, and trails. The proposed project would provide bicycle lanes and trails along Carbon Canyon Road, Lambert Road, Valencia Avenue, and Rose Drive that would further increase the connection of the area with Carbon Canyon Park, Chino Hills State Park, Brea Sports Park, and Olinda Ranch Neighborhood Park. The proposed project would further provide 70.65 acres of open space land for preservation adjacent to Chino Hills State Park as part of biological resources mitigation.</p>
<ul style="list-style-type: none"> ▪ Policy CD-1.15. Strongly encourage the master planning of any large contiguous land holdings. ▪ Policy CD-1.16. Strongly encourage the rezoning and annexation of unincorporated properties in the City of Brea in order to avoid the creation of new County islands. 	<p>Consistent. The proposed project is a master planned community that includes 1,100 dwelling units on a 262.1-acre site. As part of the proposed project, the 219.1-acre portion of the project site currently within the City's sphere of influence would be annexed to the City and zoned "Brea 265 Specific Plan" to avoid the creation of new County islands.</p>
<p>GOAL CD-10: Maintain an effective regional transportation network.</p> <ul style="list-style-type: none"> ▪ Policy CD-10.1. Work continually with Caltrans to improve access to and from State Route 57. ▪ Policy CD-10.3. Cooperate with surrounding jurisdictions to ensure the efficient operation of the arterial network system. ▪ Policy CD-10.4. Work with Caltrans, the Orange County Transportation Authority, and surrounding jurisdictions to provide adequate capacity on regional routes for through traffic and to minimize cut-through traffic on the local street system. 	<p>Consistent. As discussed in Section 5.17, <i>Transportation</i>, and Appendix N to this DEIR, the traffic analysis evaluated traffic impacts to Caltrans facilities (two SR-57 ramps at Lambert Road and seven intersections along Imperial Highway), and the cumulative projects list included planned and/or approved projects in the vicinity of the project site in the cities of Brea, Fullerton, Placentia, Yorba Linda, and Chino Hills, thereby considering impacts of the proposed project beyond the limits of the project site. The proposed project would work with Caltrans to provide adequate capacity on regional routes for through-traffic to minimize cut-through traffic on the local street system. Refer to Section 5.17, <i>Transportation</i>.</p>
<ul style="list-style-type: none"> ▪ Policy CD-10.6. Recognize that Carbon Canyon Road will continue to serve high volumes of regional traffic despite its designation as a Modified Commuter. Thus, examine design solution alternatives that can improve the safety and efficiency of Carbon Canyon Road. 	<p>Consistent. Carbon Canyon Road is a two-way street that currently provides three travel lanes, narrowing to two travel lanes in the easterly direction along the project frontage. As part of the proposed project, the south side of Carbon Canyon Road from Valencia Avenue to east along the project frontage would be constructed to its ultimate half-section width per the City's Major Arterial Highway standard and provide three 12-foot travel lanes and an 8-foot bike lane in the eastbound direction, separated by a 14-foot median within 88 feet of paved width and a right-of way of 120 feet. The proposed roadway enhancements would improve safety and efficiency of Carbon Canyon Road. The proposed project would also be required to contribute its fair share to improvements at Valencia Avenue and at Lambert Road/Carbon Canyon Road. With improvements and fair-share contribution, the intersection is anticipated to operate at a better level of</p>

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	service than in preproject conditions. Therefore, the proposed project would be consistent with improving the safety and efficiency of Carbon Canyon Road. .
<p>GOAL CD-11: Provide a safe and efficient circulation system that meets the needs of the community.</p> <ul style="list-style-type: none"> ▪ Policy CD-11.1. Maintain a circulation system that is based upon and is in balance with the Land Use Element of the General Plan. ▪ Policy CD-11.2. Establish Level of Service goals for designated City streets, and ensure that new development maintains these service levels. 	<p>Consistent. The proposed project includes an internal circulation system of roadways, sidewalks, bicycle paths, and trails. The proposed project would include four main points of entry into the project site from surrounding roadways and multiple pedestrian access points that connect to existing trails and pedestrian facilities. The proposed roadway improvements include construction of Lambert Road, Carbon Canyon Road, Valencia Avenue, and Rose Drive fronting the project site to their ultimate half-section Major Arterial Highway and Primary Arterial standards, per City’s requirements. An emergency-only access would also be provided from Blake Road. Therefore, the proposed project’s internal roadways and points of connection with existing roadways would be consistent with the Circulation Element and promote a safe and efficient circulation system that meets the needs of the city. All roadway designs and improvements would be reviewed and approved by the City.</p> <p>The internal circulation system was evaluated, as discussed in Impact 5.17-3 in Section 5.17, <i>Transportation</i>, and determined to have a less than significant impact provided that proposed project design features are implemented. The proposed project would meet the established level of service goals established by the City.</p>
<ul style="list-style-type: none"> ▪ Policy CD-11.3. Plan neighborhood streets, pedestrian walks, and bicycle paths as a system of fully connected routes throughout the City. 	<p>Consistent. The project site is currently developed with agricultural and oil extraction facilities and is closed off to the surrounding communities. The proposed project would open and connect the project site to the surrounding community. The proposed project includes an internal network of streets, sidewalks, bicycle paths, and trails that supports automobile and pedestrian mobility throughout the project site. The proposed project’s internal mobility system connects to the city’s existing street, pedestrian, bicycle, and trail networks.</p>
<ul style="list-style-type: none"> ▪ Policy CD-11.4. Protect residential streets from arterial street traffic. 	<p>Consistent. The proposed project would develop a master planned residential community with an internal residential street network. The proposed project would not include any arterial streets. Further, development of the proposed project would not redirect arterial street traffic flows to existing residential streets.</p>
<ul style="list-style-type: none"> ▪ Policy CD-11.5. Use traffic calming measures in residential neighborhoods where warranted and appropriate to enhance safety for pedestrians. 	<p>Consistent. The interior local streets have been designed as pedestrian-oriented streets that incorporate traffic-calming measures. The interior streets would include a 5-foot-wide, curb-adjacent landscaped parkway and a 5-foot-wide sidewalk on both sides.</p>
<ul style="list-style-type: none"> ▪ Policy CD-11.6. Utilize creative methods to reduce congestion and improve circulation. 	<p>Consistent. The proposed project would develop a bicycle, trail, and sidewalk network throughout the project site that would connect to existing and proposed facilities surrounding the project site. The proposed project would also enhance existing roadways abutting the project site with bikeways and trails.</p>
<ul style="list-style-type: none"> ▪ Policy CD-11.10. Work with the Brea Olinda Unified School District to establish safe routes to all schools and to facilitate better circulation surrounding schools in the A.M. and P.M. peak traffic periods. 	<p>Consistent. Olinda Elementary School, immediately south of the western portion of the project site, is in Brea-Olinda Unified School District. As part of the proposed project, roadway enhancements (including bikeways and trails) along Valencia Avenue and Rose Drive would connect to existing pedestrian facilities on Birch Street. The enhancements would be designed and constructed to meet the City’s design standards to ensure safety.</p>
<ul style="list-style-type: none"> ▪ Policy CD-11.11. Examine alternative methods such as traffic calming, landscaping, provision of bike/transit lanes to slow traffic, improve street capacity, and increase safety. 	<p>Consistent. The proposed project would incorporate strategies to slow traffic and increase safety. The new residential streets would incorporate traffic-calming measures. Due the slow speeds, bicycles would share the on-site streets. The development under the proposed project would also incorporate lighting to illuminate roadways and pathways. Rights-of-way on-site and along Lambert</p>

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<p>GOAL CD-13: Provide for an extensive, integrated, and safe bicycle, hiking, and pedestrian network throughout the community, and make Brea a pedestrian-friendly community.</p> <ul style="list-style-type: none"> ▪ Policy CD-13.1. Develop and maintain a comprehensive and integrated system of bikeways that promotes bicycling riding for commuting and recreation. ▪ Policy CD-13.2. Provide for safe and convenient pedestrian connections to and from Downtown, other commercial districts, neighborhoods, and major activity centers within the City. ▪ Policy CD-13.4. Require new developments to provide for the use of alternative modes of transit via internal trails or travel ways – public or private – for pedestrians and vehicles other than cars. New developments shall include such features as well-designed sidewalks and parkways, bike lanes and paths, and dedicated bus turn-outs. 	<p>Road, Carbon Canyon Road, Valencia Avenue, and Rose Drive would be landscaped, including landscaped raised medians.</p> <p>Consistent. The proposed project includes an extensive system of trails, sidewalks, and bicycle paths. On-site, the proposed project would incorporate a trail system that connects to existing trails in the project site vicinity. These trails are designed to allow for direct connections or through neighboring communities to existing trails outside of the project site, including the Tracks at Brea Trail, El Cajon Trail, Chino Hills Trail, and Carbon Canyon Regional Park Trail, consistent with the intent of the Brea Trails Plan. The proposed project’s sidewalks and roadways would connect to existing and proposed bicycle paths and trails along Lambert Road, Carbon Canyon Road, Valencia Avenue, and Rose Drive. As part of the proposed project, roadway enhancement would add bikeways, trails, and landscaping along the aforementioned roads. Development of the proposed project would open up a site to the community that was previously closed off, contributing a pedestrian and bicycle friendly network throughout the city.</p> <p>The project site is in close proximity to existing office, commercial, and educational uses. The proposed project’s roadway improvements along adjacent roadways would support the use of active forms of transportation to these areas.</p>
<p>GOAL CD-27: Promote balanced growth with supporting public services infrastructure.</p>	<p>Consistent. Development of the proposed project would be concurrent with public utility extensions, including but not limited to water, wastewater, and electricity lines. As discussed in Section 5.19, <i>Utilities and Service Systems</i>, the proposed project is expected to be adequately served by the proposed improvements and would not adversely impact the existing public services infrastructure provided that applicable mitigation measures are implemented. As discussed in Section 5.15, <i>Public Services</i>, the proposed project would be adequately served by existing public services with mitigation.</p>
<ul style="list-style-type: none"> ▪ Policy CD-27.1. Integrate land use and transportation planning to provide adequate transportation system service standards. 	<p>Consistent. Refer to the discussion under Policy CD-11.6.</p>
<ul style="list-style-type: none"> ▪ Policy CD-27.2. Monitor and maintain service levels standards for public services and infrastructure. ▪ Policy CD-27.3. Ensure that new development is in balance with the provision of services and/or funding. 	<p>Consistent. Refer to the discussion for Goal CD-27.</p>
<p>GOAL CD-28: Assist in the provision of adequate regional and local transportation facilities.</p> <ul style="list-style-type: none"> ▪ Policy CD-28.1. Cooperate with other agencies to address regional issues and opportunities related growth, transportation, infrastructure, and other planning issues. ▪ Policy CD-28.2. Promote the expansion and development of alternative methods of transportation. 	<p>Consistent. The proposed project includes roadway enhancements that include bicycle lanes and pedestrian paths that connect to the existing local and regional bikeways and trails to promote alternative methods of transportation. There are also four bus lines that operate in the vicinity of the project site. The proposed project would coordinate with Caltrans and the City of Placentia as applicable to reduce traffic impacts, as discussed in Section 5.17 <i>Transportation</i>, so that adequate regional and local transportation facilities are provided.</p>
<ul style="list-style-type: none"> ▪ Policy CD-28.3. Encourage the development of housing within close proximity to jobs and services. 	<p>Consistent: The project site is in close proximity to existing commercial, office, and institutional uses that serve the community, and the proposed project would provide 1,100 housing units.</p>

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Housing Element	
<p>GOAL 2.0: Assist in the provision of adequate housing to meet the needs of the community. Establish a balanced approach to meeting housing needs that includes the needs of both renter and owner households.</p> <ul style="list-style-type: none"> ▪ Policy 2.1. Financial Resources. Pursue expanded financial resources to support in the production of housing affordable to Brea’s workforce, disadvantaged communities, and special needs populations. . ▪ Policy 2.2. Mixed Income Housing. Utilize the City’s Inclusionary Housing Ordinance as a tool to integrate affordable units within market rate developments, or pay an in-lieu fee to support the provision of affordable housing. 	<p>Consistent. The proposed project includes low- and medium-density housing with average target density of 4.2 dwelling units per acre (du/ac). Each planning area within the Specific Plan would be either from 1.0 to 6.0 du/ac or from 6.1 to 12.0 du/ac. The City’s RHNA allocation during the 2021-2029 housing-element cycle is 2,365 units. Therefore, development of 1,100 units on the project site would assist in fulfilling the City’s share of regional housing needs. The proposed project also includes 76 affordable housing units.</p>
<p>GOAL 3.0: Provide adequate housing sites through appropriate land use, zoning, and specific plan designations to accommodate Brea’s share of regional housing growth needs.</p>	<p>Consistent. The project site is currently zoned HR (Hillside Residential) and R-1 (Single Family Residential), and the proposed project would use the City’s Hillside Zoning Ordinance as a foundation for implementing the Specific Plan for applicable areas.</p> <p>The City of Brea’s RHNA allocation for the 2021-2029 planning period is 2,365 units. The proposed project would provide 1,100 units, including 76 affordable units, including 25 very-low income and 51 low income units, to accommodate the City’s share of regional housing needs. The proposed project would also allow for the development of seven housing product types, therefore increasing the City’s housing supply and positively contributing to the overall housing needs of the City and the region.</p>
<ul style="list-style-type: none"> ▪ Policy 3.6. Hillside Development. Base densities in Brea’s hillsides on the ability of infrastructure, ingress and egress for evacuations, landform, physical constraints, and emergency response capabilities to support development. 	<p>Consistent. The eastern portion of the project site is currently zoned Hillside Residential, and while the proposed project would change the existing zoning on site to Brea 265 Specific Plan, the proposed project would be designed in accordance with the intent of the Hillside Development Policy. The proposed project provides adequate ingress and egress for evacuations and emergency response, as discussed in Section 5.17, <i>Transportation</i>. Development under the proposed project would be mindful of the changing topography and preserve portions of the hillside areas as open space.</p>
<ul style="list-style-type: none"> ▪ Policy 3.7. Annexation. Pursue phased annexation of the Brea’s Sphere of Influence to provide additional growth opportunities for a range of housing types consistent with infrastructure capacities. 	<p>Consistent. Upon approval of the project by the City, the unincorporated portion of the project site in the City’s sphere of influence would be annexed into the City, consistent with the 2005 pre-annexation agreement. As discussed in Section 5.19, <i>Utilities and Service Systems</i>, the proposed project is expected to be adequately served by existing public utilities with mitigation. Further, as discussed in Section 5.15, <i>Public Services</i>, the proposed project would be adequately served by existing public services.</p>
<p>GOAL 6.0: Promote a healthy and sustainable Brea through support of existing and new housing which minimizes reliance on natural resources and automobile use.</p> <ul style="list-style-type: none"> ▪ Policy 6.5. Transportation Alternatives and Walkability. Incorporate transit and other transportation alternatives including walking and bicycling into the design of new development, particularly in areas within a half-mile of 	<p>Consistent: The proposed project includes an extensive system of trails, sidewalks, and bicycle paths. On-site, the proposed project would incorporate a trail system that connects to existing trails in the project site vicinity. These trails are designed to allow for direct connections or through neighboring communities to existing trails outside of the project site, including the Tracks at Brea Trail, El Cajon Trail, Chino Hills Trail, and Carbon Canyon Regional Park Trail, consistent with the intent of the Brea Trails Plan. The proposed project’s sidewalks and roadways would connect to existing and proposed bicycle paths and trails along Lambert Road, Carbon Canyon Road, Valencia Avenue, and Rose Drive. As part of the proposed project, roadway enhancement would add bikeways, trails, and</p>

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<p>designated transit stops and the City's "Tracks at Brea" walking and biking trail system.</p> <ul style="list-style-type: none"> ▪ Policy 6.6. Jobs/Housing Balance – Encourage a closer link between housing and jobs in the community, including housing opportunities affordable to Brea's modest income workforce. 	<p>landscaping along the aforementioned roads. Development of the proposed project would open up a site to the community that was previously closed off, contributing a pedestrian and bicycle friendly network throughout the city.</p> <p>The proposed project would provide 76 affordable housing units and the project site is in close proximity to existing office, commercial, and educational uses, thereby increasing housing supplies where demands are present. As discussed in Section 5.14, <i>Population and Housing</i>, the proposed project would improve the jobs-housing balance in the city from the current 2.98 ratio to 2.80.</p>
Community Resources	
<p>GOAL CR-1: Provide a variety of parks and recreation facilities that meet the diverse needs and interests of the community.</p> <ul style="list-style-type: none"> ▪ Policy CR-1.1. Develop a high-quality network of parks and recreational facilities that meet the needs of families, young adults, seniors, children, and disabled individuals. ▪ Policy CR-1.2. Provide similar or equal levels of parks and recreational facilities to all areas of the community. ▪ Policy CR-1.3. Use the following as standards for park development, recognizing that the function of a particular park also affects classification within the system: [Refer to the table on Page 4-13 of the Brea General Plan]. ▪ Policy CR-1.4. Incorporate into large-scale residential developments small neighborhood parks and greens suitable for unstructured play and passive recreation. ▪ Policy CR-1.5. Develop, wherever possible, recreation facilities that have multi-use capabilities and high degree of adaptability to more intensive use or uses as recreation demand changes and/or population density increases. ▪ Policy CR-1.6. Provide similar or equal attention to the development of facilities for individualized activities (casual park use, bicycling, walking, running, skating and riding) as is given to organized recreation and sports. 	<p>Consistent. The proposed project includes approximately 47.5 acres of open space and 15.1 acres of parks/recreational facilities on site. In addition, the proposed project includes a network of bicycle/pedestrian and public trails that connect to a larger trail network in the city.</p> <p>The 13-acre sports park adjacent to the Brea Sports Park would provide various recreation amenities such as a baseball field, tennis courts, soccer field, pickleball courts, a full basketball court, tartan track with fitness stations, innovative play area, shade structure, concession stand, restrooms with drinking fountain and bike racks, team warmup field, and parking. The 2.1-acre Staging Area Park would include shade structure with picnic tables and trash receptacles, restroom with drinking fountain and bike racks, and gated secure parking. The Staging Area Park trailhead would allow residents to access neighboring Carbon Canyon Regional Park and Chino Hills State Park as well as other areas of the community, through multiple accessible routes. The gated parking area would be open to the public during the operating hours. These parks and open spaces would be connected through trails for walking, hiking, and bicycling. Therefore, these open space and recreational opportunities would meet the diverse needs and interests of the community.</p>
<p>GOAL CR-2: Protect and preserve existing parks and recreation facilities.</p> <ul style="list-style-type: none"> ▪ Policy CR-2.1. Protect existing public parks and open space areas from non-recreational uses. 	<p>Consistent. The existing project site does not contain parks or recreational facilities. Development under the proposed project would open the project site to the surrounding community and would incorporate parks, open space, and recreational facilities, as discussed in Goal CR-1.</p>
<p>GOAL CR-3: Maximize use of open space areas capable of supporting park-type activities.</p> <ul style="list-style-type: none"> ▪ Policy CR-3.5. Coordinate efforts with other public agencies regarding State and federal programs for existing and potential trail systems, recreational facilities, and recreation programs. ▪ Policy CR-3.6. Encourage the development of recreational facilities by the private sector, 	<p>Consistent. See Goal CR-1.</p>

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<p>including small parks and large-scale facilities requiring a high level of supporting services, supplies, and maintenance. Recreational facilities should be available to all members of the public.</p> <ul style="list-style-type: none"> ▪ Policy CR-3.7. Develop parks and recreation facilities in a manner that ensures that a minimum of damage to the environment occurs, while still providing a high quality recreation experience. 	
<p>GOAL CR-4: Preserve open space aggressively for diverse purposes – as a visual and scenic resource, for habitat conservation, to protect watersheds, and for recreation.</p> <ul style="list-style-type: none"> ▪ Policy CR-4.1. Protect and preserve open space wherever possible. ▪ Policy CR-4.2. Select areas for open space preservation using an evaluation system that incorporates the following selection criteria: connectivity, access/recreations, sensitive areas, natural features, subdivision pattern, and buffer zones. ▪ Policy CR-4.3. Work aggressively with the Orange County, Los Angeles County, State, and other appropriate public agencies, private entities, and landowners to conserve, protect, and enhance open spaces and natural resources, particularly within the sphere of influence. 	<p>Consistent. The project site is currently being used for oil production and agricultural uses. However, the project site contains various special status vegetation communities, plant and wildlife species, natural sensitive habitats, and jurisdictional resources—Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife (CDFW). Therefore, as part of mitigating effort, the project applicant is required to prepare and implement a Habitat Conservation Plan to mitigate impacts to various special status species and sensitive and critical habitats through restoration and reestablishment activities. It is anticipated that the restoration and reestablishment activities would occur on 52.86 acres of off-site open space lands, to be dedicated/preserved within and immediately adjacent to the existing Puente-Chino Hills wildlife corridor, as determined by the US Fish and Wildlife Service, which may include properties owned by SWEPI Retained Drill Sites and Aera Energy oil retained lands that are within or adjacent to Chino Hills State Park. The proposed project would also coordinate with the USACE, RWQCB, and CDFW to receive necessary permits (401 certification, 404 permit, 408 permit, and 1602 Streambed Alteration Agreement) prior to disturbance of any jurisdictional resources.</p> <p>The proposed project would preserve approximately 47.5 acres of land as open space and provide an additional 15.1 acres of land as parks and recreation space. The project site is also currently zoned for HR (Hillside Residential) and R-1, not for open space. Therefore, the proposed project is consistent with the goal of preserving open space aggressively for diverse purposes.</p>
<p>GOAL CR-5: Provide a flexible and balanced open space and conservation plan.</p> <ul style="list-style-type: none"> ▪ Policy CR-5.1. Create an open space network that is part of both the natural and urban fabric of Brea and connects to the regional open space system. ▪ Policy CR-5.2. Encourage compatible uses and activities near open space areas such as schools, parks, residential, and agricultural uses. 	<p>Consistent. See Goal CR-4. Additionally, the proposed project would preserve 47.5 acres of open space on-site. Trails through the proposed project's open space and parks/recreation space would connect to the existing trails in the vicinity of the project site, including Carbon Canyon Park, Brea Sports Park, and the Tracks at Brea Trail. A 13-acre sports park would be provided immediately north of the existing Brea Sports Park, and a 2.1-acre staging area park would allow trailhead access to neighboring Carbon Canyon Regional Park and Chino Hills State Park as well as other areas of the community through multiple routes.</p> <p>The proposed project would develop a residential community with recreational commercial and recreation/parks that are compatible with open space areas on and adjacent to the project site.</p>

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<p>Goal CR-6: Provide an extensive trail system that links all areas of Brea.</p> <ul style="list-style-type: none"> ▪ Policy CR-6.1. Create linkages to trails within Carbon Canyon and Chino Hills State Park existing and proposed trail system. ▪ Policy CR-6.2. Coordinate trails placement with landowners and conservation biologists knowledgeable of the area. ▪ Policy CR-6.3. Provide a useful, enjoyable, safe, and efficient trail system for equestrians and hikers, with the following objectives and standards: <ul style="list-style-type: none"> • Provide multi-purpose trails, where possible, to serve hikers, bicyclers, and horseback riders • Link trails with adjacent City, County, and State trail systems • Maintain trail areas in good condition, and free of litter and debris • Design trails to be flexible and site-specific to minimize the impact on adjacent property and fragile habitats • Provide a trail system with both short and long hikes/rides and serve the needs of both beginning and advanced hikers/riders • Utilize citizen volunteers to assist in the development, maintenance and operation of trails and facilities • Keep citizens aware of the trail system through publication of a trails map which also notes safety and courtesy tips • Separate trails from automobile traffic when possible in order to provide safe conditions for riders and walkers • Provide appropriate signs to mark all trails • Design trails entrances to prevent unwanted trail usage by motorized vehicles • Locate trails to provide linkages between open space and the City greenway system ▪ Policy CR-6.4. Work to incorporate recreational amenities such as trail systems, bike paths, and jogging paths with existing drainage ways, open-space corridors, and utility rights-of-way so that natural resources are retained as assets in the community's recreational system and natural environment. ▪ Policy CR-6.5. Coordinate efforts with other public agencies regarding State and federal programs for existing and potential trail systems, recreational facilities, and recreation programs. ▪ Policy CR-6.6. Develop the trail system illustrated in Figure CR-2. 	<p>Consistent. The proposed project includes an extensive trail system that would connect to existing trails in the vicinity of the project site. The pedestrian circulation system within Brea 265 would provide connections to three major city and regional trail systems, including neighboring Carbon Canyon Regional Park Trail, Olinda Oil Museum and Trail, and the Tracks at Brea Trail. The proposed bikeway system is also designed to facilitate continuous bicycle access throughout the project site and provide linkage to the regional and local bikeway networks, consistent with the City's General Plan Bikeway Plan.</p> <p>Trails on-site would be maintained by the HOA and would be kept free of litter and debris. Trails would lead to publicly accessible vista points where feasible. The proposed project would contribute to the City's trail system.</p> <p>In addition to the trail system, the proposed project would develop sidewalks and bikeways, which would connect to existing pedestrian facilities along roadways.</p>

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<ul style="list-style-type: none"> ▪ Policy CR-6.7. Require new developments to provide access and linkage to the citywide trail system. 	
<p>GOAL CR-7: Encourage an urban and walkway trail system within the urban areas of the City.</p> <ul style="list-style-type: none"> ▪ Policy CR-7.1. Encourage the development of landscaping, walkways, and bike trails that provide direct pedestrian access between work places and residential neighborhoods. ▪ Policy CR-7.2. Provide shielded safety lighting along trails and other public and private walkways separated from a street. 	<p>Consistent. Refer to the discussion for Goal 3 and Goal CR-6 (and associated policies) and Goal PS-3 (and associated policies).</p>
<p>GOAL CR-8: Preserve and maintain wildlife and animal movement corridors</p> <ul style="list-style-type: none"> ▪ Policy CR-8.1. Preserve key wildlife migration corridors and habitat areas. ▪ Policy CR-8.2. Provide adequate wildlife crossings where roadways have severed habitat areas. ▪ Policy CR-8.3. Cooperate with regional agencies and authorities with similar goals in protecting and enhancing wildlife and animal movement corridors. ▪ Policy CR-8.4. Regular monitoring of medium and large mammals is necessary to gauge the effectiveness of wildlife corridors and to identify or increases in wildlife populations. 	<p>Consistent. The project site is not within an identified wildlife corridor or a wildlife linkage. However, the project site is within critical habitat for the California coastal gnatcatcher. With the incorporation of Mitigation Measures BIO-1 through BIO-3 in Section 5.4, <i>Biological Resources</i>, the proposed project would result in a less than significant impact. The mitigation measures would ensure that the project impacts relating to wildlife and animal movement would be less than significant. Refer to Section 5.4, <i>Biological Resources</i>.</p>
<p>GOAL CR-9: Preserve and maintain open space, natural habitat, and vegetation communities that support wildlife species and animals.</p> <ul style="list-style-type: none"> ▪ Policy CR-9.1. Support regional and sub-regional efforts to acquire, develop, operate, and maintain an open space system extending from the Puente Hills to the Chino Hills. ▪ Policy CR-9.2. Preserve the integrity of blue line streams and riparian habitat areas. ▪ Policy CR-9.3. Preserve and restore the habitat value of creek corridors through the preservation of native plants and the replacement of invasive, non-native plants with native plants. ▪ Policy CR-9.4. Protect sensitive plant species resources from the impacts of development. 	<p>Consistent. With the incorporation of Mitigation Measures BIO-1 through BIO-4, the proposed project would result in a less than significant impact. The mitigation measures would ensure that the project impacts relating to vegetation communities, wildlife, habitats, waterways, and sensitive species would be less than significant. Refer to Section 5.4, <i>Biological Resources</i>.</p>

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Relevant Goals and Policies	Compliance Analysis
<ul style="list-style-type: none"> ▪ Policy CR-9.5. Manage areas of diverse wildlife habitat as a natural resource and prevent major destruction or disruption. ▪ Policy CR-9.6. Use specific management programs using sound ecological principles and professionally accepted methods are necessary to protect and restore sensitive animal populations and their habitats. 	
<p>GOAL CR-10: Pursue aggressively the preservation and protection of scenic resources.</p> <ul style="list-style-type: none"> ▪ Policy CR-10.1. Create and enforce special standards for development occurring within potential scenic highway corridors. 	<p>Consistent. As discussed in Section 5.1, <i>Aesthetics</i>, the proposed project would not adversely affect the existing scenic resources, including parks and recreation facilities, dedicated open space, prominent ridgelines, view corridors, and scenic view points as identified in the Community Resources Element Figure CR-4, Scenic Resources.</p>
<ul style="list-style-type: none"> ▪ Policy CR-10.3. Manage stands of mature trees, particularly native species, as unique and visual resources. 	<p>Consistent. The proposed project would result in removal of most trees on-site, including mature and native trees. However, impacts from removal of these trees would be less than significant, as discussed in Impact 5.4-1 in Section 5.4, <i>Biological Resources</i>, because they are not locally rare and still common throughout their range. And the adjacent Chino Hills and nearby Puente and Whittier Hills support a large mature and native tree population.</p>
<ul style="list-style-type: none"> ▪ Policy CR-10.4. Preserve major rock outcroppings as unique landmarks and visual resources to the maximum extent possible. 	<p>Consistent. The proposed project implements the City of Brea and the County of Orange grading standards. The Specific Plan would preserve the area adjacent to Carbon Canyon Regional Park to the east to take advantage of the varying terrain with trail connections and view opportunities. Grading is intended to respond to the project site's landforms and topography.</p>
<ul style="list-style-type: none"> ▪ Policy CR-10.5. Preserve stream courses in their natural state, as they represent a recreation resource, provide community identity, and serve as unifying corridors in the planning area. 	<p>Consistent. As discussed in Section 5.4, <i>Biological Resources</i>, four drainages run through the project site totaling 4,499 linear feet. Development of the proposed project would remove most of these drainages. However, these drainages are not currently accessible to the public and do not currently represent a recreation source. Since the drainages are closed off to the public, the drainages do not provide a community identity nor serve as a unifying corridor. Moreover, the proposed project would be required to mitigate impacts to jurisdictional resources through restoration/reestablishment of impacted areas at a 3:1 ratio at an off-site open space area to be dedicated by the project applicant. Therefore, development under the proposed project would not deplete an existing recreation resource. In addition, with implementation of identified mitigation measures in Section 5.4, impacts to jurisdictional waters would be less than significant.</p>
<ul style="list-style-type: none"> ▪ Policy CR-10.6. Work aggressively with Orange County, Los Angeles County, State, and other appropriate public agencies, private entities and landowners to conserve, protect and enhance natural resources, particularly within the sphere of influence. 	<p>Consistent. The proposed project would be required to coordinate with CDFW, US Fish and Wildlife Service, USACE, and RWQCB to receive necessary permits prior to disturbance of any special and sensitive biological resources.</p>
<p>GOAL CR-13: Improve air quality</p> <ul style="list-style-type: none"> ▪ Policy CR-13.1. Implement City-wide traffic flow improvements. ▪ Policy CR-13.2. Promote energy conservation and recycling by public and private sectors. ▪ Policy CR-13.3. Integrate air quality planning with land use, economic development, and transportation planning. 	<p>Inconsistent. As discussed in Section 5.3, <i>Air Quality</i>, the proposed project would result in a less than significant construction air quality impact with the incorporation of Mitigation Measure AQ-1, but would have significant and unavoidable operational air quality impacts even with mitigation. The proposed project would exceed the South Coast AQMD's threshold for volatile organic compounds (VOC) but emissions for other criteria pollutants would not be exceeded. As discussed in Section 5.8, <i>Greenhouse Gas Emissions</i>, the proposed project would result in significant and unavoidable GHG emissions impact even with mitigation. Therefore, the proposed project would conflict with</p>

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Relevant Goals and Policies	Compliance Analysis
<ul style="list-style-type: none"> ▪ Policy CR-13.5. Encourage alternative modes of transportation, such as walking, biking, and public transportation to reduce emissions associated with automobile use. ▪ Policy CR-13.6. Cooperate with the South Coast Air Quality Management District and Southern California Association of Governments in their efforts to implement the regional Air Quality Management Plan. ▪ Policy CR-13.7. Work with other responsible federal, State, and County agencies to decrease air pollution emissions occurring within the air basin. ▪ Policy CR-13.8. Cooperate and participate in regional air quality management planning, programs, and enforcement measures. 	<p>the South Coast AQMD and SCAG's efforts to implement the regional air quality management plan and contribute adversely to emissions in the air basin.</p> <p>The proposed project would comply with the Building Energy Efficiency Standards (Title 24) and incorporate energy efficiency features, water conservation features, and materials efficiency to promote energy conservation.</p> <p>The Brea 265 Specific Plan encourages sustainability through developing a mobility network with roadways, pedestrian and bicycle trails and sidewalks, and pathways that link different areas of the project site and link to existing pedestrian facilities. This encourages alternative modes of transportation, such as walking and biking, to reduce emissions associated with automobile use.</p> <p>As discussed in Section 5.17, <i>Transportation</i>, project-generated VMT per service population would lower than Brea's VMT per service population for the corresponding traffic analysis zones. Therefore, VMT impacts would be less than significant.</p>
<p>GOAL CR-14: Preserve historically significant landmarks and/or sites, individual structures, objects, and neighborhoods, and encourage appropriate rehabilitation.</p> <ul style="list-style-type: none"> ▪ Policy CR-14.1. Ensure design compatibility of new development within close proximity to designated historic structures and neighborhoods. ▪ Policy CR-14.2. Create historic districts for areas with a concentration of historically and architecturally significant structures. ▪ Policy CR-14.3. Review all development and rehabilitation proposals affecting historic structures, landmarks, and objects in terms of site design and building design. ▪ Policy CR-14.4. Explore funding resources/alternatives for rehabilitation and restoration of historic structures. ▪ Policy CR-14.5. Encourage the recycling and re-use of existing historic structures through incentive programs. ▪ Policy CR-14.6. Discourage the demolition of structures eligible for listing in the National Register of Historic Places and/or the State Historic Landmarks, the County, and/or the local historic register. ▪ Policy CR-14.7. Preserve and enhance the City's history and tradition through inclusion of historic sites and other resources in the City's park lands. ▪ Policy CR-14.8. Accommodate heritage elements in recreation programs and events. 	<p>Consistent. Development under the Brea 265 Specific Plan would not result in the adverse change of historical resources. As discussed under Impact 5.5-1 in Section 5.5, <i>Cultural Resources</i>, the Brea-Olinda Oil Field District was not recommended eligible for listing in the California Register. The development at the project site would not remove historically significant landmarks, sites, or structures.</p> <p>With regard to archeological and paleontological materials, compliance with Mitigation Measures CUL-1 and GEO-1, respectively, would reduce impacts to a less than significant level.</p>

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Table 5.11-2 Consistency with General Plan Goals and Policies

Relevant Goals and Policies	Compliance Analysis
Public Safety Element	
<p>GOAL PS-2: Improve community safety and reduce opportunities for criminal activity through appropriate physical design.</p> <ul style="list-style-type: none"> ▪ Policy PS-2.1. Develop defensible space guidelines to be used in the review of development proposals. ▪ Policy PS-2.2. Maximize natural surveillance through physical design features, including well-lighted driveways, walkways, and exteriors; visible entryways from surrounding structures and businesses; well-defined walkways and gates; and landscaping that does not obscure visibility. ▪ Policy PS-2.3. Ensure that community areas and amenities such as transit stops, sidewalks, plazas, and parks are appropriately lighted, free of hidden spaces, and patrolled. ▪ Policy PS-2.4. Practice active surveillance measures in certain areas such as parking structures. 	<p>Consistent. As discussed in Section 5.15, <i>Public Services</i>, the proposed project would have a less than significant impact to police protection services with the implementation of PPP PS-10 through PPP PS-12 and incorporation of Mitigation Measure PS-1. The east side of the project site would have gated entries except for the entry into the staging area park and emergency-only access from Blake Road. The west side of the project site would not have gated entries. The new sports park and the staging area park would provide adequate lighting and visible entryways to encourage natural surveillance. The residential areas would be fenced. Active and passive security measures would deter criminal activity at the project site.</p>
<p>GOAL PS-3: Provide safe pedestrian environments citywide.</p> <ul style="list-style-type: none"> ▪ Policy PS-3.1. Ensure that pedestrian safety is enhanced and maintained through the inclusion of well-designed streets, sidewalks, crosswalks, traffic control devices, and school routes throughout Brea. ▪ Policy PS-3.2. Require all developments to provide adequate safety lighting in pedestrian areas and parking lots. ▪ Policy PS-3.3. Provide shielded safety lighting along trails and other public and private walkways separated from a street. 	<p>Consistent. The proposed project would develop sidewalks, trails, and bicycle paths throughout the project site that would connect to existing pedestrian facilities in the vicinity of the project site. The proposed project would also provide trails and bicycle paths along public roadways, including Lambert Road, Carbon Canyon Road, Valencia Avenue, and Rose Drive. All roadways and pedestrian facilities developed as part of the proposed project would be designed and constructed to meet the City's standards to promote a safe pedestrian environment. Roadways, pedestrian amenities, and parking areas on-site would be lit to provide a measure of safety.</p>
<p>GOAL PS-4: Protect the community from the hazards associated with the transportation, use, and storage of hazardous materials in the urban environment.</p> <ul style="list-style-type: none"> ▪ Policy PS-4.2. Reduce the risks associated with ground transportation hazards. ▪ Policy PS-4.3. Work with responsible Federal, State, and County agencies to identify and regulate the disposal of toxic materials. 	<p>Consistent. As discussed in Section 5.9, <i>Hazards and Hazardous Materials</i>, the proposed project would have a less than significant impact regarding hazards and hazardous materials with the incorporation of Mitigation Measures HAZ-1 through HAZ-12. The incorporation of the identified mitigation measures would ensure that impacts relating to the handling and transportation of such materials or potential release of hazardous substances are less than significant. The development under the Brea 265 Specific Plan would further be required to comply with all applicable federal, State, and local regulations regarding hazardous materials.</p> <p>With regard to policy PS-4.2, the proposed project would include roadways and bicycle and pedestrian facilities that would be designed and constructed to reduce pedestrian-vehicle conflicts and reduce transportation hazards.</p>

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Table 5.11-2 Consistency with General Plan Goals and Policies

Relevant Goals and Policies	Compliance Analysis
<p>GOAL PS-5: Minimize the public's exposure to potential hazards associated with existing and abandoned oil facilities.</p> <ul style="list-style-type: none"> ▪ Policy PS-5.1. Work closely with responsible State and Federal agencies to ensure that active oil field operations comply with all current regulations and, once oil field operations cease, that appropriate closure and clean-up activities occur. ▪ Policy PS-5.2. Continue to support the regulations of the California Division of Oil, Gas, and Geothermal Resources regarding abandoned oil facilities. ▪ Policy PS-5.3. Require comprehensive investigation, disclosures, and remediation of any former oil field property proposed for an alternative use. 	<p>Consistent. The implementation of the Brea 265 Specific Plan would redevelop a site that was used for oil extraction and agricultural uses into a residential development. Development at the project site would comply with local, state, and federal regulations for the closure of oil field operations and handling of hazardous materials.</p> <p>As discussed in Section 5.9, <i>Hazards and Hazardous Materials</i>, the proposed project would have a less than significant impact regarding hazards and hazardous materials with the incorporation of Mitigation Measures HAZ-1 through HAZ-12.</p>
<p>GOAL PS-6: Protect the community from wildland fires.</p> <ul style="list-style-type: none"> ▪ Policy PS-6.1. Consider implementing a vegetation management plan that considers non-traditional methods of controlling vegetation, such as prescribed burning, in undeveloped areas. ▪ Policy PS-6.2. Encourage residents to plant and maintain fire-retardant slope cover to reduce the risk of brush fire in areas adjacent to the canyons, and develop and implement stringent site design and maintenance standards for areas with high fire potential. To the extent possible, native, non-evasive plant material are encouraged. ▪ Policy PS-6.3. Assure provision of adequate fire equipment access and fire suppression resources to all developed and open space areas. ▪ Policy PS-6.4. Require new development to ensure that the City's five-minute fire response time be maintained. 	<p>Consistent. As discussed in Section 5.20, <i>Wildfire</i>, the proposed project would result in a less than significant impact with regard to wildfire. The proposed project includes fuel modification zones (see Figure 5.20-1) along its northern and eastern boundaries. The fuel modification zones would include a wet zone with 100 percent removal of undesirable shrubs and a thinning zone with 50 percent thinning of shrubs.</p> <p>These areas may include approved plant species from Brea Fire and OC Fire guidelines.</p> <p>The development of the Specific Plan would be designed to meet the City's Fire Code, which would ensure adequate provision and access to fire equipment and resources. Additionally, the project applicant is required submit an overall Fire Master Plan at the time of the project approval to be reviewed and approved by the City of Brea Fire Department as conditions of approval. The conditions of approval would also require that the project applicant submit separate fire plans at the time of tentative tract map review process for individual planning areas to be reviewed and approved by the Brea Fire Department (PPP PS-5).</p> <p>The existing average response times for Brea Fire ranges from 4 minutes 47 seconds to 5 minutes 4 seconds, where the City's goal is to respond within 4 minutes for the first fire apparatus to arrive on scene, and 8 minutes for a multiunit response team arrive on scene. As discussed under Section 5.15, <i>Public Services</i>, and Section 5.20, <i>Wildfire</i>, the proposed project would have a less than significant impact to fire protection services and from wildfire with implementation of PPP PS-1 through PPP PS-9.</p>

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Table 5.11-2 Consistency with General Plan Goals and Policies

Relevant Goals and Policies	Compliance Analysis
<p>GOAL PS-7: Reduce the risk to the community from flooding hazards.</p> <ul style="list-style-type: none"> ▪ Policy PS-7.1. Cooperate and work with the Orange County Flood Control District to ensure District flood control facilities are well maintained and capable of accommodating, at a minimum, 100-year storm flows. ▪ Policy PS-7.2. Require that new developments minimize stormwater and urban runoff into drainage facilities by incorporating design features such as detention basins, on-site water features, or other strategies. ▪ Policy PS-7.3. Maintain an active storm drain inspection program. ▪ Policy PS-7.4. Protect critical facilities located within areas subject to flooding. ▪ Policy PS-7.5. Evaluate and monitor water storage facilities to determine which facilities are not self-contained and might pose an inundation hazard to downstream properties. ▪ Policy PS-7.6. Employ strategies and design features that will reduce the amount of impervious surfaces (i.e. paved area) for new development projects. 	<p>Consistent. As discussed in Section 5.10, <i>Hydrology and Water Quality</i>, the project site is not located within a 100-year flood hazard zone, but a portion of the project site east of Rose Drive is within the flood hazard zone for the Carbon Canyon Dam. With the implementation of Mitigation Measure HYD-1 (in Section 5.10), the proposed project would have a less than significant impact to flooding hazards.</p> <p>The proposed project would include an on-site drainage system. Water quality and detention basins would be provided within the project site. This would minimize the amount of stormwater runoff leaving the Site. The Specific Plan also identifies the use of water quality basins as potential stormwater treatment areas.</p> <p>The proposed project would increase impervious surfaces compared to existing conditions; however, as discussed in Section 5.10, potential impacts to drainage would be less than significant with implementation of PPP HYD-1 through PPP HYD-3. The drainage system on-site would be maintained and inspected by the City.</p>
<p>Source: City of Brea General Plan.</p>	

Land Use Designation and Zoning

Approximately 219.1 acres of the northern portion of the project site is in unincorporated Orange County, and 43 acres of the southern portion of the project site is in the City of Brea. The unincorporated portion of the project site is currently zoned A1(O), General Agriculture with an oil production overlay (Orange County 2016). The unincorporated portion of the project site has the land use designations: 1B (Suburban Residential), 4 (Public Facilities), and 5 (Open Space) (Orange County 2015). The southern portion of the project site, within the City of Brea, is zoned HR (Hillside Residential) with a corresponding General Plan land use designation of Hillside Residential.

The Local Agency Formation Commission identifies lands for cities' annexation and establishes cities' spheres of influence. A city may identify zoning and land use designations for areas within its sphere of influence for when such lands are annexed into the city. The eastern side of the project site within the sphere of influence is rezoned HR (Hillside Residential), with a corresponding General Plan land use designation of Hillside Residential (similar to the portion of the project site within the City of Brea). The western side of the project site is rezoned Single-Family Residential (R-1), with a corresponding General Plan land use designation of Low Density Residential.

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With approval of the proposed project and the Development Agreement, the 219.1-acre portion of the project site within the sphere of influence would be annexed to the City, consistent with the 2005 pre-annexation agreement between the City of Brea, County of Orange, and Aera Energy (project applicant). In addition, the project site would have a new General Plan Land Use designation of Brea 265 Specific Plan. The Brea 265 Specific Plan land use and development standards are developed based on the City's Hillside Zoning Ordinance. Approval of the proposed project and requested discretionary actions, including the Development Agreement, would allow for the proposed development under the Brea 265 Specific Plan.

Conclusion

As discussed under Impact 5.11-2, the proposed project would be consistent with many goals and policies of the City's General Plan and SCAG's RTP/SCS.

Level of Significance Before Mitigation: Less than significant impact.

5.11.5 Cumulative Impacts

The proposed project involved an amendment to the General Plan Land Use designations and zoning classifications for the project site, but as demonstrated in Impact 5.11-2, the proposed project would be consistent with most goals and policies of the City's General Plan. Land use and zoning regulations are derivatives of a City's general police power. As shown in *Sierra Club v. County of Napa*, 121 Cal. App.4th 1490 (2004), a given project need not be in perfect conformity with each and every general plan policy. To be consistent, a [project] must be "compatible with" the objectives, policies, general land uses and programs specified in the general plan. Table 5.11-1 provides an analysis as to why the proposed project is consistent (i.e., "compatible") with SCAG's adopted RTP/SCS, and Table 5.11-2 provides an analysis of why the proposed project is compatible with the City of Brea General Plan. Other development projects in the city are also required to demonstrate consistency with the City's General Plan and other applicable policies and regulations governing land use prior to approval. The proposed project would allow for additional employment opportunities during construction and provide necessary housing units to meet the RHNA allocation and to improve the City's overall jobs-housing balance while providing adequate supporting infrastructure and services. Implementation of cumulative development, when combined with the proposed project, would not result in cumulatively considerable land use impacts.

5.11.6 Level of Significance Before Mitigation

Upon implementation of the plans, programs, and policies, the following impacts would be less than significant: 5.11-1 and 5.11-2.

5.11.7 Mitigation Measures

No mitigation measures are required.

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5.11.8 Level of Significance After Mitigation

Impacts are less than significant prior to mitigation. Therefore, no significant unavoidable adverse impacts relating to land use remain.

5.11.9 References

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