



11.0 Appendices



11.1 Initial Study/Notice of Preparation and Comment Letters

Notice of Preparation

Notice of Preparation

To: Reviewing Agencies and Interested Parties

From: City of Stanton

7800 Katella Avenue

(Address)

Stanton, CA 90680

Subject: Notice of Preparation of a Draft Environmental Impact Report

The City of Stanton

_____ will be the Lead Agency and will prepare an environmental impact report for the project identified below. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by our agency when considering your permit or other approval for the project.

The project description, location, and the potential environmental effects are contained in the attached materials. A copy of the Initial Study (is is not) attached.

The Initial Study is also available for review at the address shown above and on-line at: <http://ci.stanton.ca.us/Departments/Community-Development/Planning-Division>. Pursuant to CEQA Guidelines Section 21080.4, comments must be submitted within the 30-day public review period beginning March 22, 2019 and ending the close of business on April 22, 2019.

Please send your response to Kelly Hart at the address shown above. We will need the name for a contact person in your agency.

Project Title: Tina-Pacific Neighborhood Development Plan Project

Project Applicant, if any: Related California, 18201 Von Karma Avenue, Suite 900, Irvine, CA 92612

The City will conduct a public scoping meeting to present the project and the EIR process and to receive public comments and suggestions regarding the scope and content of the EIR. The meeting will be held on April 1, 2019 at 10:00 a.m. at the Stanton City Hall, 7800 Katella Avenue, CA 90680.

Date 3/19/19

Signature



Title Community and Economic Development Director

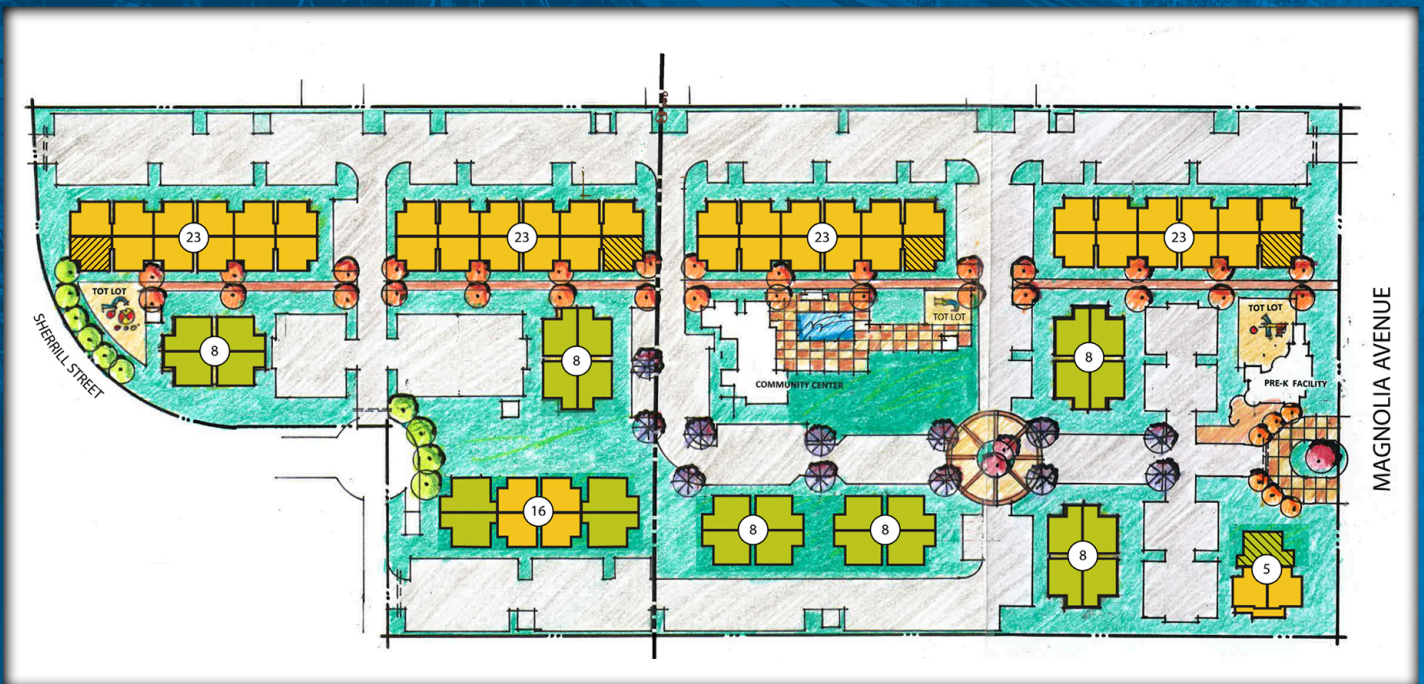
Telephone (714) 890-4286

Reference: California Code of Regulations, Title 14, (CEQA Guidelines) Sections 15082(a), 15103, 15375.

March 2019



Tina-Pacific Neighborhood Development Plan Project Initial Study



Prepared for:
City of Stanton

Prepared by:

Michael Baker
INTERNATIONAL

INITIAL STUDY

**Tina-Pacific Neighborhood
Development Plan Project**

Lead Agency:



CITY OF STANTON
7800 Katella Avenue
Stanton, California 90680
Contact: Ms. Kelly Hart
Community and Economic Development Director
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March 2019

JN 170136

This document is designed for double-sided printing to conserve natural resources.



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1.0 INTRODUCTION

1.1 BACKGROUND

The Tina-Pacific Neighborhood Development Plan Project (project) proposes to develop a 161-unit multi-family affordable housing development generally at the intersection of Magnolia Avenue and Pacific Avenue in the City of Stanton (City). To do so, the City is proposing to acquire 15 on-site parcels; relocate existing tenants; demolish all structures and existing street improvements; and vacate two public roadways (Tina Way and Pacific Avenue) and two public alleyways on-site. Based on the availability of funding, two development options are proposed. Both development options would have the same number of units, however one option would include a preschool facility and additional recreational amenities. The proposed project is discussed in detail in Section 2.0, *Project Description*. Following preliminary review, the City determined that the project is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA) (Public Resources Code Sections 21000 - 21177). This Initial Study addresses the potential for direct, indirect, and cumulative environmental effects associated with the project, as proposed.

1.2 PURPOSE

In accordance with State CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.) Section 15367, the City of Stanton is identified as the Lead Agency for the proposed project. Pursuant to Section 15063(a), the City is required to undertake the preparation of an Initial Study to determine if the proposed action will have a significant effect on the environment. The purposes of this Initial Study are to: (1) identify potential environmental impacts, (2) provide the Lead Agency with information to use as the basis for deciding whether to prepare an Environmental Impact Report (EIR) or Negative Declaration, (3) enable the Lead Agency to modify the proposed project (through mitigation of adverse impacts), (4) facilitate assessment of potential environmental impacts early in the design of the proposed project, and (5) provide documentation for the potential finding that the proposed project will not have a significant effect on the environment or can be mitigated to a level of insignificance (CEQA Guidelines, Section 15063[c]). This Initial Study is also an informational document providing an environmental basis for subsequent discretionary actions that could be required from other Responsible Agencies.

1.3 STATUTORY REQUIREMENTS AND AUTHORITY

CEQA Guidelines Section 15063 identifies specific disclosure requirements for inclusion in an Initial Study. Pursuant to those requirements, an Initial Study shall include: (1) a description of the proposed project, including the location of the project site; (2) an identification of the environmental setting; (3) an identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that some evidence exists to support the entries; (4) a discussion of ways to mitigate significant effects identified, if any; (5) an examination of whether the proposed project is compatible with existing zoning, plans, and other applicable land-use controls; and (6) the name(s) of the



person or persons who prepared or participated in the preparation of the Initial Study (CEQA Guidelines, Section 15063[d]).

1.4 PERMITS AND APPROVALS

The project as proposed in Section 2.0 would require the following permits and approvals from the City: Precise Plan of Development; Tentative Tract Map; Street Vacation; Conditional Use Permit; Density Bonus Concession; and Grading and Building Permits. Agencies such as the Santa Ana Regional Water Quality Control Board and South Coast Air Quality Management District could also require the City to obtain approvals for the proposed project. Coordination with other agencies may be required to determine the specific nature of any future permits or approvals.

1.5 INCORPORATION BY REFERENCE

The following documents were utilized during preparation of this Initial Study and are incorporated into this document by reference. These documents are available for review at Stanton City Hall located at 7800 Katella Avenue, Stanton, CA 90680.

- City of Stanton General Plan (adopted September 23, 2008). The *City of Stanton General Plan* (General Plan) provides a general, comprehensive, and long-range guide for community decision-making. The General Plan is organized into seven chapters, or topic areas that contain the mandatory elements as well as optional elements: Community Development; Community Design; Economic Development; Infrastructure and Community Services; Community Health and Safety; Housing; and Regional Coordination. Each of these chapters presents an overview of its scope, summary of conditions, key issues, and planning goals, strategies, and actions. Goals and strategies of the General Plan are applicable to all lands within the City's jurisdiction. The General Plan was utilized throughout this document as the fundamental planning document governing development at the project site. Background information and policy information from the General Plan is cited in several sections of this document.
- Stanton Municipal Code (current through Ordinance 1074 and the January 2018 code supplement). The *Stanton Municipal Code* (Municipal Code) consists of regulatory, penal, and administrative ordinances of the City. It is the method the City uses to implement control of land uses, in accordance with General Plan goals and strategies. Municipal Code Title 20, *Zoning*, encompasses the City's Zoning Code, which carries out the General Plan strategies by classifying and regulating the uses of land and structures within the City. The Zoning Code is adopted to protect and to promote the public health, safety, comfort, convenience, prosperity, and general welfare of residents and businesses in the City.



2.0 PROJECT DESCRIPTION

2.1 PROJECT LOCATION

The City of Stanton (City) is located in the northwestern portion of Orange County; refer to [Exhibit 2-1, *Regional Vicinity*](#). The City comprises approximately three-square miles and is bordered by the cities of Anaheim to the north and east, Garden Grove to the south and west, and Cypress to the west.

The proposed Tina-Pacific Neighborhood Development Plan Project (project) site is generally located in the northeast quadrant of the City, to the west of the intersection of Magnolia Avenue and Pacific Avenue. More specifically, the 10.27-acre project site is bounded by Tina Way to the north, Magnolia Avenue to the east, an alleyway south of Pacific Avenue to the south, and Sherrill Street to the west; refer to [Exhibit 2-2, *Site Vicinity*](#). The site encompasses 40 parcels as well as portions of two public streets (Tina Way and Pacific Avenue) and two alleyways. Regional access to the project site is provided via State Route 22 (SR-22) via the Beach Boulevard and Magnolia Avenue off-ramps. Local access to the project site is provided by Tina Way, Pacific Avenue, and two alleyways off Magnolia Avenue.

2.2 ENVIRONMENTAL SETTING

The project site is located in a developed and urbanized area of Stanton and is currently developed with 28 four-plex apartment buildings comprised of 112 residential units, the Illuminations Foundation Children's Resource Center (operated by the Second Harvest Food Bank of Orange County, Inc.), a community garden, and several vacant lots. Of the 112 residential units, 110 are currently occupied. Most of the vacant lots on-site are utilized as informal parking areas for neighborhood residents and one vacant lot has a portable building owned by the Illuminations Foundation for the intended extended operation of the Children's Resource Center; refer to [Exhibit 2-2](#).

GENERAL PLAN LAND USE DESIGNATION AND ZONING

Based on the *City of Stanton General Plan* (General Plan) Land Use Map and the City's Zoning Map, the project site is both designated and zoned High Density Residential.

The General Plan intends High Density Residential areas for the development of multi-family residential neighborhoods that provide a variety of housing types, with particular emphasis on ownership, and with provision for affordable housing. Densities range from 11.1 to 18 dwelling units per acre with an allowed density bonus of up to 35 percent (above the 18 dwelling units per acre) if developments provide affordable housing for low- and moderate-income households.

According to the City's Zoning Code, the High Density Residential (RH) zone is intended for a variety of multi-family attached housing types as well as accessory structures and uses, primarily located on larger lots along arterial highways. The RH zone may also allow nonresidential uses that complement and serve the



immediate neighborhood, including schools, parks, libraries, and public facilities. Quasi-residential uses (e.g., convalescent hospitals, supportive housing, and transitional housing) are also allowed. In accordance with the General Plan Housing Element *Residential Land Resources Appendix* and California Government Code Section 65583.2, properties in the RH zone may be developed at a net density of thirty dwelling units per acre or greater in order to meet lower income growth needs.

SURROUNDING LAND USES

Surrounding land uses include a mixture of commercial and residential uses as well as utility and railroad easements. More specifically, land uses surrounding the project site are as follows; refer to Exhibit 2-2:


- North: Tina Way bounds the project site to the north with single-family residences, designated Low Density Residential and zoned Single-Family Residential (RL) to the north of Tina Way.
- East: Magnolia Avenue bounds the project site to the east with commercial uses, designated General Commercial and zoned Commercial Neighborhood Zone (CN), along the east side of Magnolia Avenue. A small area to the east of the Magnolia Avenue and Pacific Avenue intersection is located within the City of Anaheim jurisdiction and includes single-family residences designated Low Density Residential under the *City of Anaheim General Plan Land Use Plan* and zoned Single-Family Residential (RS-1) under the *City of Anaheim Zoning Map*.^{1,2}
- South: A Southern California Edison (SCE) utility easement, designated and zoned Open Space (OS), is located to the south of the project site and is currently used as a nursery. Further south of the nursery are railroad tracks associated with the Union Pacific Railroad (UPRR).
- West: Sherrill Street and a portion of the SCE utility easement bound the project site to the west with single-family residences designated Low Density Residential and zoned RL west of Sherrill Street, and the SCE easement further west designated Public/Institutional and zoned Industrial General (IG) Zone.

¹ City of Anaheim, *Zoning Title 18 Map*, adopted June 8, 2004, amended July 19, 2018, <https://www.anaheim.net/DocumentCenter/View/1871/Zoning-Map?bidId=>, accessed November 29, 2018.

² City of Anaheim, *General Plan Land Use Plan*, adopted May 25, 2004, revised June 12, 2018, http://www.anaheim.net/DocumentCenter/View/9519/Z0-GeneralPlan_24x55_Map?bidId=, accessed December 14, 2018.



Source: Google Earth Pro, 2018.

 - Project Site

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TINA-PACIFIC NEIGHBORHOOD DEVELOPMENT PLAN PROJECT
INITIAL STUDY

Site Vicinity

Exhibit 2-2



2.3 BACKGROUND AND HISTORY

The original residential neighborhood was built in 1963 and consisted of 40 four-plex apartment buildings, with a four-car garage for each four-plex, and one single-family residence used as a caretaker's home. The development was operated as one large apartment complex under one property management company. In the 1970s, the complex was subdivided and each four-plex building was converted into individual parcels, creating 40 total parcels. Over time, the development began to deteriorate to a point where the neighborhood accounted for over 15 percent of police calls for service for the entire City.

In 2009, due to the deteriorated and blighted state of the neighborhood, and the significant calls for service, the Stanton City Council authorized the initiation of property acquisitions within the neighborhood in preparation for a future redevelopment project. From 2009 to 2012, the Stanton Redevelopment Agency purchased 25 of the 40 parcels in the neighborhood utilizing a mixture of low- and moderate-income housing funds and bond monies. Of the 25 parcels, the City relocated tenants from 12 properties and demolished the apartment complexes. In 2011, AB1X 26 was passed and upheld by the California Supreme Court to dissolve all redevelopment agencies in the State. As such, the Stanton Redevelopment Agency was dissolved, and the redevelopment of the project site was put on hold until such time when alternative funding sources could be identified. The City ceased purchasing properties and continues to maintain the remaining 13 acquired properties and its residents.

Additional funding for the proposed project was identified with the recent sale of a property owned by the Stanton Housing Authority property, successor to the Stanton Redevelopment Agency for housing related activities. The Stanton Housing Authority has partnered with a developer to complete the acquisition of the remaining 15 parcels, relocate all remaining tenants, and develop a 161-unit affordable housing project.

2.4 PROJECT CHARACTERISTICS

2.4.1 PROJECT DESCRIPTION

The proposed project involves constructing a 161-unit multi-family affordable housing development. To do so, the City is proposing to acquire the 15 remaining properties on-site; relocate all existing tenants; demolish all structures and existing street improvements; and vacate the two public roadways (Tina Way and Pacific Avenue) and two alleyways on-site. Based on the availability of funding, the City is proposing two development options as described below and illustrated on Exhibits 2-3a, *Conceptual Site Plan – Development Option One*, and 2-3b, *Conceptual Site Plan – Development Option Two*.

DEVELOPMENT OPTION ONE

Phase I

Phase I encompasses 6.1 acres of the eastern portion of the project site closer to Magnolia Avenue. Development of Phase I would involve constructing an 83-unit residential development, consisting of 50 two-bedroom units (one of which would be occupied by an on-site property manager) and 33 three-bedroom units



rented to low-income households; refer to [Exhibit 2-3a](#). All buildings would have a maximum building height of two stories.

The dwelling units are proposed to be restricted, pursuant to the California Department of Housing and Community Development (HCD) or California Tax Credit Allocation Committee (TCAC), whichever is more restrictive, to the following affordability levels: (i) 21 units restricted at 30 percent HCD/TCAC Area Median Income (AMI), (ii) 9 units restricted at 45 percent HCD/TCAC AMI, (iii) 33 units restricted at 50 percent HCD/TCAC AMI, and (iv) 19 units restricted at 60 percent HCD/TCAC AMI. One on-site property manager unit would be provided free of charge.

Phase II

Phase II of the project encompasses approximately 4.1 acres of the western portion of the project site. Development of Phase II would involve constructing a 78-unit residential development, consisting of 54 two-bedroom units and 24 three-bedroom units. All structures would have a maximum building height of two stories.

The dwelling units are proposed to be restricted to the following affordability levels: (i) 20 units restricted at 30 percent HCD/TCAC AMI, (ii) 8 units restricted at 45 percent HCD/TCAC AMI, (iii) 31 units restricted at 50 percent HCD/TCAC AMI, and (iv) 18 units restricted at 60 percent HCD/TCAC AMI. Similar to the Phase I development, one on-site property manager unit would be provided free of charge. This second phase would be integrated into Phase I of the project as one cohesive livable community; refer to [Exhibit 2-3a](#). In order to consolidate both phases of the project, the City is proposing street vacations of Pacific Avenue and Tina Way and the two alleyways. [Table 2-1, Proposed Residential Phases](#), summarizes the proposed unit types and count by phase.

**Table 2-1
Proposed Residential Phases**

Phase	Dwelling Units
Phase I	
Unit 1 (Stacked Flat; two-bedroom)	50
Unit 2 (Stacked Flat; three-bedroom)	33
<i>Subtotal</i>	83
Phase II	
Unit 1 (Stacked Flat; two-bedroom)	54
Unit 2 (Stacked Flat; three-bedroom)	24
<i>Subtotal</i>	78
Total	161

The project would be required to comply with common open space requirements detailed in *Stanton Municipal Code* (Municipal Code) Section 20.420.050(e). As stated in Section 20.420.050(e), multi-family developments with 12 or more dwelling units are required to provide 30 percent of the total site area for usable open space for passive and active recreational uses. Thirty percent of the total site area is approximately 134,208 square feet. In compliance with Municipal Code Section 20.420.050(e), the proposed development would provide at least 134,208 square feet of common open space, including a community center located in the center of the site, two tot lots, and several landscaped pedestrian walkways between the proposed residential buildings to meet the City's common open space requirements.



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TINA-PACIFIC NEIGHBORHOOD DEVELOPMENT PLAN PROJECT
INITIAL STUDY

Conceptual Site Plan – Development Option One

Exhibit 2-3a



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TINA-PACIFIC NEIGHBORHOOD DEVELOPMENT PLAN PROJECT
INITIAL STUDY

Conceptual Site Plan – Development Option Two

Exhibit 2-3b



DEVELOPMENT OPTION TWO

Development Option Two proposes the same number of affordable housing units in the same two phases as Development Option One. Both options would have the same unit counts based on affordability levels. The only changes to the proposed site plan under Development Option Two is the inclusion of a 2,300-square foot preschool facility and one additional tot lot along Magnolia Avenue as well as a community pool in the center of the site. Priority to the preschool facility would be given to on-site residents with any additional capacity open to neighboring residents within the Magnolia Union Elementary School District.

The amenities proposed under Development Option One (i.e., a community center, two tot lots, and several landscaped pedestrian walkways between the proposed residential buildings) would similarly be developed under Development Option Two. With additional funding, the developer is also proposing to enhance building materials and façades. Overall, Development Option Two would provide at least 134,208 square feet of common open space area to comply with the open space requirements under Municipal Code Section 20.420.050(e).

LANDSCAPING

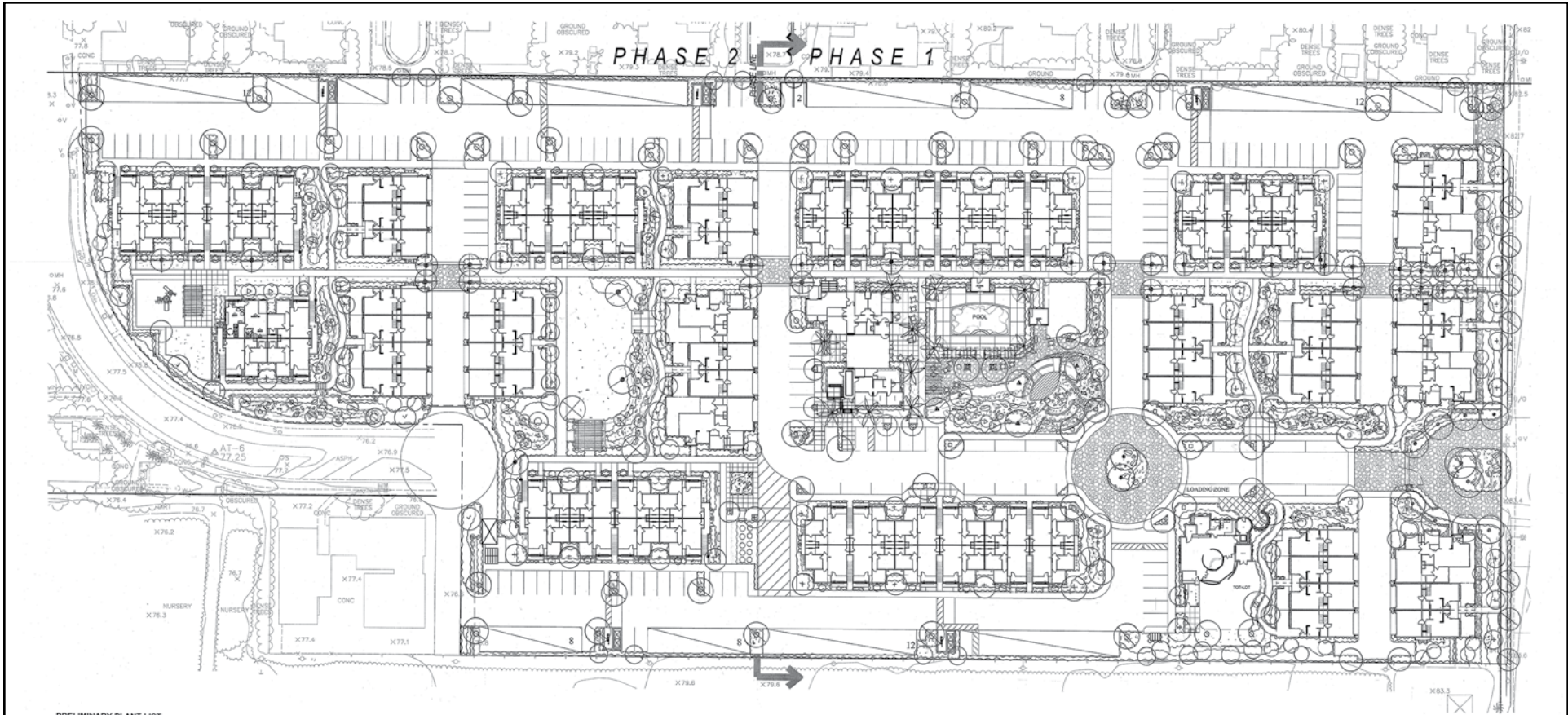
Exhibit 2-4, *Conceptual Landscape Plan*, illustrates the proposed landscaping on-site under both development options, which would include several varieties of trees, shrubs, grasses, groundcover, and vines throughout the project site. Tree species include Australian willow, California sycamore, coastal and southern live oak, date palms, Chilean mesquite, bailey acacia, eucalyptus, Mexican and western redbud, and Italian cypress, among others. These plants are planned along Magnolia Avenue and Sherrill Street and building and site perimeters, at the main entry, in the center of the entryway roundabout, in common open space areas, along pedestrian walkways, and in parking areas. Permanent automatic irrigation systems would be installed in all landscaped areas on-site, and all proposed landscaped areas would conform to the City's landscape standards and requirements per Municipal Code Chapter 20.315, *Landscaping Standards*. The landscaped areas would be maintained by the property owner.

SITE ACCESS

Under both development options, vehicular access to the project site would be provided from one main gated entry along Magnolia Avenue. One gated egress-only point would be constructed at the northwest corner of the site towards Sherrill Street. Emergency vehicle access would be provided via a gated entryway at the northeast corner of the site along Magnolia Avenue as well as two gated egress points at the southwest corner of the site; refer to Exhibits 2-3a and 2-3b.

PARKING

Municipal Code Section 20.320.030, *Number of Off-Street Parking Spaces Required*, details the number of parking spaces required for various uses, including the proposed multi-family use. However, as a multi-family development with 100 percent restricted affordable units, the project qualifies for by-right parking incentives per Municipal Code Section 20.330.040, *Concessions and/or Incentives*. Table 2-2, *Required and Proposed Parking Spaces*, details the required and proposed parking spaces for the project based on Municipal Code Sections 20.320.030 and 20.330.040.



PRELIMINARY PLANT LIST

Western Garden Zone 22
WUCOLS Region 3

SYMBOL	BOTANICAL NAME/COMMON NAME	SIZE	SPACING	WUCOLS
TREES				
○	<i>Gajera paniculata</i> Magnolia Ave.	Australian Willow	24' Box	30' O.C. L
○	<i>Zelkova serrata</i> So. Sherrill Street	Sawleaf Zelkova	24' Box	30' O.C. L
○	<i>Quercus agrifolia</i> OR Cercidium 'Aur' (Thornless)	Coastal Live Oak Palo Verde or Hybrid Desert	48' Box 48' Box	Per Plan L
○	<i>Quercus agrifolia</i> OR Quercus virginiana	Coastal Live Oak Southern Live Oak	30' Box 30' Box	Per Plan L Per Plan M

SYMBOL	BOTANICAL NAME/COMMON NAME	SIZE	SPACING	WUCOLS
Central Common Open Space				
○	<i>Phoenix dactyloides</i> 'Zahid'	Zahid Date Palm	20 FT. 8TH	Per Plan L
○	<i>Cercidium 'Aur'</i> (Thornless)	Palo Verde or Hybrid Desert	30' Box Multi-Branch	Per Plan L
○	<i>Prosopis juliflora</i>	Chicoan Mesquite	30' Box	Per Plan L
○	<i>Quercus agrifolia</i>	Coastal Live Oak	30' Box	Per Plan L
Secondary Open Space				
○	<i>Acacia baileyana</i>	Sally Acacia	24' Box	Per Plan L
○	<i>Cercis mexicana</i>	Mexican Redbud	24' Box	Per Plan L
○	<i>Cercis occidentalis</i>	Western Redbud	24' Box	Per Plan L
○	<i>Lagerstromia indica</i> 'Muskogee'	Crape Myrtle	30' Box Multi-Branch	Per Plan M
○	<i>Cupressus sempervirens</i> 'Tiny Towers'	Tiny Towers Italian Cypress	24' Box	Per Plan L

SYMBOL	BOTANICAL NAME/COMMON NAME	SIZE	SPACING	WUCOLS
Accent Trees				
○	<i>Cercidium 'Aur'</i> (Thornless)	Palo Verde or Hybrid Desert	30' Box Multi-Branch	Per Plan L
○	<i>Chionopsis leavis</i>	Desert Willow	24' Box	Per Plan L
○	<i>Lagerstromia indica</i> 'Muskogee'	Crape Myrtle	30' Box Multi-Branch	Per Plan M
○	<i>Arbutus 'Marina'</i>	Marina Arbutus	24' Box	Per Plan M
Infiltration Swales				
○	<i>Cercis c. 'Forest Pansy'</i>	Eastern Redbud	15 Gal.	Per Plan M
○	<i>Cercis c. 'Mexicana'</i>	Mexican Redbud	15 Gal.	Per Plan M
○	<i>Populus fremontii</i>	Western Cottonwood	15 Gal.	Per Plan M
○	<i>Sambucus mexicana</i>	Blue Elderberry	15 Gal.	Per Plan L
○	<i>Platanus racemosa</i>	California Sycamore	15 Gal.	Per Plan L
○	<i>Baccharis salicifolia</i>	Mulefat	5 Gal.	Per Plan M

SYMBOL	BOTANICAL NAME/COMMON NAME	SIZE	SPACING	WUCOLS
Building Perimeter				
○	<i>Arbutus 'Marina'</i>	Marina Arbutus	24' Box	Per Plan M
○	<i>Cupressus sempervirens</i>	Italian Cypress	24' Box	Per Plan L
○	<i>Acacia stenophylla</i>	Shoestring Acacia	24' Box	Per Plan L
○	<i>Rhus lancea</i>	African Sumac	24' Box	30' O.C. L
Garage Edge				
○	<i>Rhaphiophora indica</i>	Indian Hawthorn	5 Gal.	Per Plan L
Site Perimeter Buffer				
○	<i>Acacia aneura</i>	Mulga	24' Box	Per Plan L
○	<i>Acacia stenophylla</i>	Shoestring Acacia	24' Box	Per Plan L
○	<i>Eucalyptus nicholii</i>	Peppermint Gum Eucalyptus	24' Box	Per Plan L
○	<i>Melaleuca linariifolia</i>	Flax Leaf Paper Bark	15 Gal.	Per Plan L
○	<i>Pinus banksia</i> ssp. <i>elastica</i>	Elastic Pine	15 Gal.	Per Plan L

Source: Site Design Studio, Inc., May 2016

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TINA-PACIFIC NEIGHBORHOOD DEVELOPMENT PLAN PROJECT
INITIAL STUDY

Conceptual Landscape Plan

Exhibit 2-4



**Table 2-2
Required and Proposed Parking Spaces**

Unit Type	Required Parking Spaces ¹	By-right Reduced Parking Requirement Incentive ²	Proposed Parking Spaces			
			Phase I		Phase II	
			Resident	Guest	Resident	Guest
Studio	1 space	1 space	--	--	--	--
1 Bedroom	2 spaces		--	--	--	--
2 Bedroom	2.75 spaces	2 spaces	166	12	156	32
3 Bedroom	3.5 spaces					
4+ Bedroom Units	4 spaces and 0.5 spaces per additional bedroom	2.5 spaces	--	--	--	--
Every 3 Units	1 guest parking	--	--	--	--	--
Total Proposed Parking Spaces			322 residential spaces and 32 guest spaces			
Sources:						
¹ City of Stanton, Stanton Municipal Code Section 20.320.030, Number of Off-Street Parking Spaces Required.						
² City of Stanton, Stanton Municipal Code Section 20.330.040, Concessions and/or Incentives.						

As shown in Table 2-2, the by-right parking incentives would reduce the project’s required parking. Under both development options, Phase I would develop 83 two- and three-bedroom units, which would require 166 spaces, and Phase II would develop 78 two- and three-bedroom units that would require 156 spaces. In addition, Phase I and II would provide 20 and 12 guest parking spaces, respectively. Overall, the project would provide 322 on-site residential parking spaces and 32 guest spaces.

UTILITIES AND SERVICES

The following utilities and services would serve the project site:

- Water. Similar to existing conditions, the Golden State Water District (GSWD) West Orange County System would continue to provide water services to the proposed project. GSWD’s water supplies consist predominantly of groundwater pumped from the Orange County Groundwater Basin and imported water from the Colorado River Aqueduct and State Water Project distributed by the Metropolitan Water District of Southern California.
- Sewer. The City’s Public Works Department would continue to provide sanitary sewer services to the project site for collection and delivery to one of two wastewater treatment facilities operated by the Orange County Sanitation District (OCSD) in Fountain Valley and Huntington Beach.
- Drainage. Storm drain facilities are owned and maintained by the City’s Public Works Department. Under existing conditions, stormwater runoff is collected via existing curbs and gutters along Tina Way and Pacific Avenue. Similarly, the proposed neighborhood would utilize existing curbs and gutters in adjacent roadways for stormwater runoff collection.

PROPERTY ACQUISITION AND TENANT RELOCATION PROCESS

As part of the project, the City is proposing to acquire the 15 remaining non-City-owned parcels on-site and relocate all existing tenants. Voluntary relocation of all tenants is anticipated but there may be a need for eminent domain. The property acquisition and tenant relocation process would occur as part of the project.



2.5 PHASING/CONSTRUCTION

As detailed above, the project would be developed in two phases under both development options: Phase I would construct an 83-unit development and Phase II would construct a 78-unit development; refer to [Exhibit 2-3](#). Phase I is anticipated to be constructed over a period of 12 months, beginning December 2020 through November 2021. Construction of Phase II would occur at a later date when adequate financing and funding is secured, which is anticipated to occur in December 2021 at the earliest. At that time, Phase II would be constructed over a period of 12 months, beginning December 2021 through November 2022. Earthwork would be balanced on-site and would not require any import or export of materials.

2.6 AGREEMENTS, PERMITS, AND APPROVALS

The City of Stanton, as Lead Agency, has discretionary authority over the project proposal, which includes the following:

- Certification of the Environmental Impact Report;
- Precise Plan of Development;
- Tentative Tract Map;
- Street Vacation;
- Conditional Use Permit;
- Density Bonus Concession; and
- Issuance of applicable Grading and Building Permits.

In addition, the following permits/approvals may be required of other agencies:

- NPDES Construction General Permit and Operations Permit – Santa Ana Regional Water Quality Control Board; and
- Construction Permit – South Coast Air Quality Management District.



3.0 INITIAL STUDY CHECKLIST

3.1 PROJECT DESCRIPTION AND BACKGROUND

1. Project Title:

Tina-Pacific Neighborhood Development Plan Project

2. Lead Agency Name and Address:

City of Stanton, 7800 Katella Avenue, Stanton, CA 90680

3. Contact Person and Phone Number:

Ms. Kelly Hart
Community and Economic Development Director
714.890.4213

4. Project Location:

The proposed 10.27-acre project site is generally located at the intersection of Magnolia Avenue and Pacific Avenue in the northeast quadrant of the City of Stanton.

5. Project Sponsor's Name and Address:

City of Stanton, 7800 Katella Avenue, Stanton, CA 90680

Related California, 18201 Von Karman Avenue, Suite 900, Irvine, CA 92612

6. General Plan Designation:

Based on the *City of Stanton General Plan Land Use Map*, the project site is designated High Density Residential.

7. Zoning:

The project site is zoned High Density Residential (RH) by the *City of Stanton Zoning Map*.

8. Description of Project:

The Tina-Pacific Neighborhood Development Plan Project (project) proposes to develop a 161-unit multi-family affordable housing development generally at the intersection of Magnolia Avenue and Pacific Avenue in the City of Stanton (City). To do so, the City is proposing to acquire 15 parcels on-site; relocate existing tenants; demolish all structures and existing street improvements; and vacate two public



roadways (Tina Way and Pacific Avenue) and two public alleyways on-site. Project approval would require a Precise Plan of Development, Tentative Tract Map, Street Vacation, Conditional Use Permit, Density Bonus Concession, Planned Development Permit, and CEQA Clearance.

9. Surrounding Land Uses and Setting:

Surrounding uses in proximity to the project site include a mixture of commercial and residential uses, as well as utility and railroad easements.

10. Other public agencies whose approval is required:

- NPDES Construction General Permit – Santa Ana Regional Water Quality Control Board; and
- Construction Permit – South Coast Air Quality Management District.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

In compliance with Assembly Bill 52, the City distributed letters to applicable Native American tribes informing them of the proposed project on February 4, 2019. As detailed in Section 4.18, Tribal Cultural Resources, the EIR will evaluate the project’s potential impacts to tribal cultural resources and summarize the City’s consultation efforts with applicable Native American tribes.

12. Environmental Factors Potentially Affected:

The environmental factors checked below potentially would be affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages. Please see the Initial Study for additional information.

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



3.2 DETERMINATION

On the basis of this initial evaluation:

<input type="checkbox"/>	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
<input type="checkbox"/>	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
<input checked="" type="checkbox"/>	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
<input type="checkbox"/>	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
<input type="checkbox"/>	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

<i>Kelly Hart</i>	City of Stanton
Signature	Agency
Ms. Kelly Hart, Community and Economic Development Director	3/19/19
Printed Name/Title	Date

3.3 EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including offsite as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the Lead Agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial



evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.

4. “Negative Declaration: Less Than Significant with Mitigation” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The Lead Agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, “Earlier Analyses,” may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less Than Significant with Mitigation,” describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a. the significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significance.



3.4 CEQA CHECKLIST

Description	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
I. AESTHETICS: Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
II. AGRICULTURE AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and the forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
III. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



Description		Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
b)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c)	Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d)	Result in other emissions (such as those leading to odors adversely affecting a substantial number of people)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
IV.	BIOLOGICAL RESOURCES: Would the project:				
a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c)	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
V.	CULTURAL RESOURCES: Would the project:				
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to in § 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c)	Disturb any human remains, including those interred outside of dedicated cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
VI.	ENERGY: Would the project:				
a)	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



Description		Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
VII.	GEOLOGY AND SOILS: Would the project:				
a)	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i)	Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii)	Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii)	Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv)	Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b)	Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e)	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
VIII.	GREENHOUSE GAS EMISSIONS: Would the project:				
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b)	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
IX.	HAZARDS AND HAZARDOUS MATERIALS: Would the project:				
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



Description		Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
X.	HYDROLOGY AND WATER QUALITY: Would the project:				
a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i)	Result in substantial erosion or siltation on- or off-site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii)	Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii)	Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv)	Impede or redirect flood flows?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
XI.	LAND USE AND PLANNING: Would the project:				
a)	Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b)	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XII.	MINERAL RESOURCES: Would the project:				
a)	Result in the loss of availability of a known mineral resource of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b)	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



Description		Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
XIII.	NOISE: Would the project result in:				
a)	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b)	Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c)	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XIV.	POPULATION AND HOUSING: Would the project:				
a)	Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
XV.	PUBLIC SERVICES:				
a)	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
	Fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Schools?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Other public facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
XVI.	RECREATION:				
a)	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XVII.	TRANSPORTATION: Would the project:				
a)	Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



Description		Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
b)	Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? ³	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c)	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d)	Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
XVII I.	TRIBAL CULTURAL RESOURCES:				
a)	Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i)	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii)	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
XIX.	UTILITIES AND SERVICE SYSTEMS: Would the project:				
a)	Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c)	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

³ While this Appendix G Checklist Question has been modified by the Natural Resources Agency to address consistency with CEQA Guidelines section 15064.3, subdivision (b), which relates to use of the vehicle miles traveled (VMT) as the methodology for evaluating traffic impact, the City has not yet adopted a VMT methodology to address this updated Appendix G Checklist Question. Thus, the analysis is based on the City's adopted traffic analysis methodology, which requires use of level of service to evaluate traffic impacts of a project.



Description		Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
d)	Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e)	Comply with Federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XX.	WILDFIRE: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b)	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c)	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d)	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XXI.	MANDATORY FINDINGS OF SIGNIFICANCE				
a)	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b)	Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



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4.0 ENVIRONMENTAL EVALUATION

The following evaluation provides responses to the questions in the Initial Study. A brief explanation for each question in the Initial Study is provided to adequately support each impact determination. All responses consider the whole of the action involved including construction and operational impacts as well as direct and indirect impacts. Environmental factors potentially affected by the proposed project are presented below and organized according to the format of the Checklist.

4.1 AESTHETICS

Would the project:

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

No Impact. The General Plan does not list any scenic vistas within the City of Stanton. No impact would occur in this regard.

- b) *Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?*

No Impact. Based on the California Department of Transportation's (Caltrans) California Scenic Highway Mapping System, there are no scenic highways near the project site.⁴ The closest officially designated or eligible State scenic highways are Highway 1 (Pacific Coast Highway) located approximately 8.3 miles to the southwest and State Route 91 (SR-91), located approximately 8.9 miles to the northeast. Views of the project site from Highway 1 or SR-91 are not readily afforded from the project site due to topographic conditions and intervening structures. Thus, project development would have no impact on scenic resources within a State scenic highway.

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

Less Than Significant Impact. The project site is surrounded in all directions by urbanized uses. As a result, project implementation would not substantially degrade the existing visual character or quality of the site and its surroundings. Currently, the project site is developed with 28 single-story four-plex apartment buildings, the Illuminations Foundation Children's Resource Center, a community garden, a portable building, and several vacant (disturbed) lots. Most of the vacant lots on-site are utilized as informal parking areas for neighborhood residents and illegal refuse disposal.

⁴ California Department of Transportation, *California Scenic Highway Mapping System*, http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/, accessed December 5, 2018.



Additionally, a portable building currently used for the intended extended operation of the Children's Resource Center is located within the western extent of the project site. Ornamental landscaping and mature trees are scattered throughout the project site, primarily along the apartment unit frontages. Other visible features include walls and fencing, overhead power lines, and other utilities.

The proposed project would substantially enhance the visual quality of the site and its surroundings by redeveloping the site with a 161-unit, two-story multi-family residential apartment community spread across 13 buildings and connected by internal roadways. A variety of private residential open space would be distributed throughout the project site. Development Option One would include several recreational amenities on-site, including a community center, two tot lots, and several landscaped pedestrian walkways between the proposed residential buildings; refer to Exhibit 2-3a, Conceptual Site Plan – Development Option One. Development Option Two would include those same amenities with the addition of a preschool facility and one additional tot lot along Magnolia Avenue along with a pool at the community center; refer to Exhibit 2-3b, Conceptual Site Plan – Development Option Two. Pursuant to the City's landscape standards and requirements, various trees, shrubs, grasses, groundcover, and vines would be planted throughout the project site; refer to Exhibit 2-4, Conceptual Landscape Plan. The developer also plans to seek additional funding to enhance building materials and façades.

According to the City's Zoning Map, the site is zoned High Density Residential (RH). Per Municipal Code Section 20.210.010(D), *High Density Residential (RH) Zone*, the RH zone is intended for a variety of multi-family attached housing types as well as accessory structures and uses, primarily located on larger lots along arterial highways. As indicated in Table 4.11-2, Development Standards Consistency Analysis, the project would be consistent with development standards specific to residential zones within the City. Further, in conformance with Municipal Code Chapter 20.530, *Site Plan and Design Review*, the City would review the project to ensure that it is compatible and complementary to its neighboring uses as part of its Site Plan and Design Review process. As a result, the project would not conflict with applicable zoning or other regulations governing scenic quality, and impacts would be less than significant.

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

Less Than Significant Impact. The site is in an urbanized area of Stanton that has various sources of light and glare. Sources include street lights and vehicular lights along Tina Way, Magnolia Avenue, and Pacific Avenue, residential lighting to the north and west, and building and signage lighting from adjacent commercial uses to the east. The site itself also has light sources generated by the existing apartment buildings, the Illuminations Foundation Children's Resource Center, and the portable building.

The types of land uses that are typically sensitive to excess light and glare include residential uses, hospitals, senior housing, and other types of uses where excessive light may disrupt sleep. Existing light sensitive uses in the project vicinity include residential uses to the north and west of the project site. The proposed project would generate new light sources associated with nighttime illumination for the proposed buildings, parking areas, and internal roadways. Nighttime illumination would also



be used to enhance security and safety for pedestrians and vehicles within the apartment community. Vehicular traffic generated by the project would also contribute to light and glare in the project area. These new light and glare sources would be partially visible to the light sensitive uses in the project vicinity. Municipal Code Section 20.300.080, *Outdoor Light and Glare*, includes several requirements to minimize the impacts of outdoor lighting on sensitive uses. The general outdoor lighting standards identified by Municipal Code Section 20.300.080 include:

- Outdoor lighting fixtures shall be designed, shielded, aimed, located, and maintained to shield adjacent properties and to not produce glare onto adjacent properties or roadways. Parking lot light fixtures and light fixtures on buildings shall be full cut-off fixtures.
- In parking lots, light fixture poles shall not be more than 30 feet in height and lamps shall be high pressure sodium (HPS), unless modified by approval of a Minor Variance in compliance with Municipal Code Chapter 20.555, *Variances and Minor Variances*.
- Street lighting shall be provided in compliance with the requirements of the Department of Public Works.
- Flashing, revolving, or intermittent exterior lighting visible from any lot line or street shall be prohibited, except if approved as an accessory feature on a temporary basis in conjunction with a Temporary Use Permit issued in compliance with Municipal Code Chapter 20.540, *Temporary Use Permits, Annual Advertising Permits and Special Event Permits*.

Pursuant to Municipal Code Section 20.300.080, the average maintained lighting levels for the proposed project shall not exceed 0.5 foot-candles at lot line boundaries and 1.0 foot-candles at buildings, parking lots, or other areas. The maximum-to-average ratio shall not exceed 2.5 to 1.

Additionally, the project's light sources would be similar to those of the surrounding land uses. Because the surrounding area is largely developed, the lighting associated with the project's improvements and structures would not substantially increase light and glare in the project vicinity. Compliance with Municipal Code regulations would ensure light and glare impacts are less than significant.



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4.2 AGRICULTURE AND FORESTRY RESOURCES

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

Would the project:

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

No Impact. Per the California Department of Conservation, the project site is situated within urban and built-up land.⁵ As the project site is predominantly developed with residential properties and several disturbed lots, no agricultural resources exist within the project site. Land designated as Unique Farmland is located adjacent to the project's southern boundary within a Southern California Edison (SCE) easement and is currently utilized as a nursery. Development of the project would not impact the SCE easement area and thus, would not convert any farmland to non-agricultural use. No impacts would occur in this regard.

- b) ***Conflict with existing zoning for agricultural use, or a Williamson Act contract?***

No Impact. The project site is zoned High Density Residential. Thus, the project would not conflict with existing zoning for agricultural use. There are also no lands under an existing Williamson Act contract.⁶ As such, no impacts would occur.

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

No Impact. As stated above in Response 4.2(b), the project site is not zoned for any agricultural, forest land, timberland, or timberland production. Project implementation would not affect any

⁵ California Department of Conservation, *Orange County Important Farmland 2016*, September 2018, <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/ora16.pdf>, accessed December 4, 2018.

⁶ California Department of Conservation, *Agricultural Preserves 2004 Williamson Act Parcels, Orange County, California*, 2004, ftp://ftp.consrv.ca.gov/pub/dlrp/wa/Orange_WA_03_04.pdf, accessed December 4, 2018.



existing lands zoned for forest land, timberland, or timberland production nor cause rezoning. Therefore, no impacts would occur.

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

No Impact. Refer to Response 4.2(c).

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

No Impact. Refer to Responses 4.2(a) and 4.2(c).



4.3 AIR QUALITY

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

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

Potentially Significant Impact. The project site is located within the South Coast Air Basin (Basin), which is governed by the South Coast Air Quality Management District (SCAQMD). The U.S. Environmental Protection Agency (EPA) has classified the Basin as a non-attainment area for Federal and State air quality standards. The SCAQMD *CEQA Air Quality Handbook* specifies the main criteria that must be addressed to determine consistency with the SCAQMD's *2016 Air Quality Management Plan* (AQMP). Because project implementation (temporary construction-related and long-term operational impacts) could result in potentially significant impacts involving conflicts or obstruction of implementation of the AQMP, further analysis will be conducted as part of the EIR.

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

Potentially Significant Impact. Refer to Response 4.3(a).

Short-Term (Construction) Emissions

Demolition and construction activities associated with the project would generate pollutant emissions from demolition, grading/excavation, operation of construction equipment, and construction vehicle activities. These activities could result in a cumulatively considerable net increase of criteria pollutants in the Basin. An analysis of the project's impacts from construction-related activities will be conducted as part of the EIR to determine whether the project's construction-related emissions would exceed SCAQMD thresholds.

Long-Term (Operational) Emissions

Long-term air quality impacts typically consist of mobile source emissions generated from project-related traffic and from stationary source emissions from combustion to produce space heating, water heating, other miscellaneous heating, or air conditioning, consumer products, and landscaping. An air quality analysis will be conducted for the proposed project to determine if operation-related activities would exceed SCAQMD's regional significance thresholds. This topic will be addressed in the EIR.



c) *Expose sensitive receptors to substantial pollutant concentrations?*

Potentially Significant Impact. Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. The California Air Resources Board (CARB) has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis.

Sensitive uses near the project site include adjacent single-family residences to the north, across Tina Way, to the east across Magnolia Avenue, and to the west across Sherrill Street. Project-related demolition, grading, and excavation operations could result in air quality impacts to sensitive receptors. Construction of the project would also increase short-term construction vehicle trips on area roadways and result in associated air pollutants. Construction-related air quality impacts to sensitive receptors will be analyzed utilizing the SCAQMD's Localized Significance Thresholds (LST) methodology. Operational impacts of the project, including project-generated vehicle trips and on-site landscaping and maintenance may also expose sensitive uses to substantial pollutants. These impacts require additional analysis in the EIR and specific emissions quantification to assess their level of potential significance.

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

Less Than Significant Impact. The proposed project would not emit objectionable odors that would affect a substantial number of people. Pursuant to SCAQMD Rule 402, projects that typically create emissions that could lead to odor nuisance include facilities such as wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities.

Emissions and odors generated by the proposed residential project, which would not include project-attributes or facilities that would create objectionable odors, are not expected to be significant or highly objectionable and would be required to comply with SCAQMD Rule 402. Therefore, no impacts would occur in this regard.

Emissions from construction equipment, such as diesel exhaust, and from volatile organic compounds from architectural coatings and paving activities, may generate odors; however, these odors would be temporary, intermittent, and not expected to affect a substantial number of people. Additionally, noxious odors would be confined to the immediate vicinity of the construction equipment. By the time such emissions reach any sensitive receptor sites, they would be diluted to well below any level of air quality concern. Furthermore, short-term construction-related odors are expected to cease upon the drying or hardening of the odor-producing materials. Therefore, impacts associated with operation- and construction-generated odors would be less than significant.



4.4 BIOLOGICAL RESOURCES

Would the project:

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

No Impact. The project site is located within a developed, urbanized area with no sensitive species or habitats. The site is improved with 28 single-story four-plex apartment buildings, the Illuminations Foundation Children's Resource Center, a community garden, a portable building, and several vacant (disturbed) lots currently utilized as informal parking areas for residents. The site has minimal landscaping and scattered ornamental trees along Tina Way and Pacific Avenue. The area to the south of the site is designated Open Space and is currently utilized as a nursery.

Based on the project site's disturbed condition, demolition of existing on-site uses and development of the project would not adversely impact any candidate, sensitive, or special status biological resources. The existing nursery to the south of the site also would not be impacted by project construction or operations. Thus, no impacts would occur in this regard.

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

No Impact. Riparian habitats are those occurring along the banks of rivers and streams. Sensitive natural communities are natural communities that are considered rare in the region by regulatory agencies, known to provide habitat for sensitive animal or plant species, or known to be important wildlife corridors.

There are no riparian habitats in the project area. The closest mapped riparian habitat is the Stanton Storm Channel approximately 0.3 miles to the west of the site across Dale Avenue and the Southern California Edison easement area.⁷ Additionally, the Stanton Storm Channel is a concrete-lined channel with no riparian habitat within the channel. Given the distance from the project site, construction and operations of the project would not impact the Stanton Storm Channel. Overall, the project site has been heavily disturbed by existing development and no riparian habitat or other sensitive natural community exists within the project area. Additionally, the project area is not included in local or regional plans, policies, or regulations that identify riparian habitat or other sensitive natural communities. No impacts would occur in this regard.

⁷United States Fish and Wildlife Services, *National Wetlands Inventory Wetlands Mapper*, <https://www.fws.gov/wetlands/Data/Mapper.html>, 2018, accessed December 5, 2018.



- c) ***Have a substantial adverse effect on State or Federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?***

No Impact. Wetlands are defined under the Federal Clean Water Act as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that normally does support, a prevalence of vegetation adapted to life in saturated soils. Wetlands include areas such as swamps, marshes, and bogs. The project site is completely developed and surrounded by urban development; no State or Federally protected wetlands are located on-site. As stated above, the closest mapped wetland is the Stanton Storm Channel, which is a concrete-lined channel, and thus, does not support wetland habitat. As such, the proposed development would not involve the direct removal, filling, hydrological interruption, or other direct or indirect impact to wetlands under jurisdiction of regulatory agencies. No impacts are anticipated in this regard.

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

Less Than Significant Impact. The project site consists entirely of developed or disturbed habitat and is surrounded by other urban uses. While a nursery is located to the south of the project site, the site itself does not have any significant areas that may currently be used as wildlife corridors or nursery sites for native and migratory wildlife. The minimal landscaping and vegetation on-site also do not provide suitable nesting habitat for migratory birds. Additionally, the Migratory Bird Treaty Act (MBTA) governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. Therefore, if any nesting migratory birds are found within the ornamental trees on-site, construction workers would be required to halt activities until the young have fledged, until a qualified biologist has determined the nest is inactive, or until appropriate mitigation measures that respond to the specific situation have been developed and implemented in consultation with the regulatory agencies. Compliance with the MBTA would ensure impacts are reduced to less than significant levels.

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

Less Than Significant Impact. Street trees in Stanton are protected under Municipal Code Chapter 12.20, *Street Tree Plan*, which states that no person, firm or corporation is allowed to plant, remove, replace or cause to be planted, removed or replaced any tree within a dedicated right-of-way without having first obtained a permit in writing from the City engineer to do so. Additionally, all work in planting, removing or replacing a street tree is required to be done to the satisfaction of the City's Community and Economic Development Director. Project development would involve removing ornamental trees along Tina Way and Pacific Avenue and planting of new trees based on the proposed landscape plan; refer to Exhibit 2-4, Conceptual Landscape Plan. As such, project compliance with Municipal Code Chapter 12.20 would ensure impacts are less than significant.



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

No Impact. According to the California Department of Fish and Wildlife, the proposed project is located within the plan area of the Orange County Transportation Authority (OCTA) Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP).⁸ The OCTA NCCP/HCP encompasses all of Orange County and involves the acquisition, conservation, and enhancement of natural habitat as mitigation for impacts on biological resources from freeway capital improvement projects.⁹ No natural habitat is present on-site and thus, the site would not be a candidate for conservation or enhancement under the OCTA NCCP/HCP. Additionally, the project is not a freeway capital improvement project. As such, development of the project would not conflict with the OCTA NCCP/HCP and no impacts would occur in this regard.

⁸ California Department of Fish and Wildlife, *California Regional Conservation Plans*, October 2017, <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>, accessed December 5, 2018.

⁹ Orange County Transportation Authority, *Implementing Agreement for the Orange County Transportation Authority Natural Community Conservation Plan (NCCP)/Habitat Conservation Plan (HCP)*, 2016.



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4.5 CULTURAL RESOURCES

Would the project:

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

Potentially Significant Impact. The project site encompasses 28 single-story four-plex apartment buildings, the Illuminations Foundation Children's Resource Center, a community garden, a portable building, and several vacant (disturbed) lots. The project proposes to demolish all remaining buildings and structures on-site to construct the proposed multi-family development. Existing buildings planned for demolition could be identified as historic resources. Thus, a Cultural/Paleontological Resources Assessment, including a historic evaluation, will be prepared to evaluate the project's potential impact and will be analyzed in the EIR.

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

Potentially Significant Impact. The City, including the project site, is built out and in a highly developed, urban area of Orange County. However, construction activities would involve excavation and grading activities that could uncover previously undiscovered archaeological resources on-site. Further evaluation, including a Cultural/Paleontological Resources Assessment, is necessary and will be considered in the EIR to assess potential project impacts in this regard.

- c) ***Disturb any human remains, including those interred outside of dedicated cemeteries?***

Potentially Significant Impact. Due to the level of past disturbance on-site, it is not anticipated that human remains, including those interred outside of formal cemeteries, would be encountered during earth removal or disturbance activities. However, excavation below existing grading could uncover previously undiscovered human remains. If human remains are found, those remains would require proper treatment, in accordance with applicable laws, including State of California Public Resources Health and Safety Code Section 7050.5-7055. Potential impacts to human remains will be further evaluated in the EIR.



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4.6 ENERGY

Would the project:

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

Potentially Significant Impact. Energy consumption associated with the project could result in potential direct and indirect environmental impacts. Such impacts include the depletion of nonrenewable resources (e.g., oil, natural gas, coal, etc.) and emissions of pollutants during both construction and operations. The EIR will analyze the project's energy consumption impacts related to electricity, natural gas, and transportation fuel for vehicle trips associated with the new development as well as the fuel necessary for project construction.

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

Potentially Significant Impact. Title 24 regulated by the California Energy Commission (CEC) regulates energy efficiency standards for residential and non-residential buildings. Compliance with the most recent 2016 standards would substantially reduce Statewide electricity and natural gas consumption. Additionally, the California Green Building Code (California Code of Regulations, Title 24, Part 11) is a mandatory construction code requiring new residential and commercial buildings to comply with mandatory measures under five topical areas: planning and design; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality. The City does not have a local energy action plan; however, the EIR will evaluate the project's consistency with State renewable energy and energy efficiency standards.



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4.7 GEOLOGY AND SOILS

Would the project:

- a) ***Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:***
- i. ***Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?***

No Impact. The project site is not underlain by an Alquist-Priolo Earthquake Fault Zone.¹⁰ Thus, project implementation would not involve impacts associated with earthquake fault rupture.

- ii. ***Strong seismic ground shaking?***

Less Than Significant Impact. The project area, like the rest of Southern California, is situated within a seismically active region as the result of being located near the active margin between the North American and Pacific tectonic plates. According to the General Plan, active faults in the region include the Newport-Inglewood – Rose Canyon Fault Zone, Elsinore Fault Zone – Whittier Section, Norwalk Fault, Elysian Park Fault, and San Andreas Fault. Active and potentially active faults within southern California could produce seismic shaking at the project site, and it is likely that the proposed project would periodically experience ground shaking as a result of moderate to large magnitude earthquakes.

In accordance with the California Building Code (CBC) and Municipal Code Section 16.36.010, *California Existing Building Code Adopted*, structures built for human occupancy must be designed to meet or exceed the CBC standards for earthquake resistance. The CBC includes earthquake safety standards based on a variety of factors including occupancy type, types of soils and rocks on-site, and strength of probable ground motion at the project site. Pursuant to Municipal Code Section 16.55.014, *Soil Engineering and Engineering Geology Reports*, a site-specific soil and engineering geology report would be required for the proposed project to determine on-site geologic conditions and appropriate design parameters. The City Building Official or City Engineer would ensure incorporation of the soil and engineering geology report's recommended actions as a condition to the grading permit. Compliance with the CBC and the recommendations identified in the project's soil and engineering geology report would reduce impacts to less than significant levels.

¹⁰ California Geologic Survey, *Earthquake Zones of Required Investigation Anaheim Quadrangle*, http://gmw.conservacion.ca.gov/SHP/EZRIM/Maps/ANAHEIM_EZRIM.pdf, accessed December 6, 2018.



iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. The potential for seismic-related ground failure is associated with the probability of severe ground shaking because of a nearby active fault. Liquefaction is the phenomenon that occurs when saturated granular soils develop high pore water pressures during seismic shaking and behave like a heavy fluid. This phenomenon generally occurs in areas of high seismicity where groundwater is shallow and loose granular soils or hydraulic fill soils subject to liquefaction are present. For liquefaction to develop, loose granular sediments below the groundwater table must be present; and shaking of sufficient magnitude and duration must occur.

According to the General Plan, the entire City is located in a liquefaction hazard zone. Pursuant to Municipal Code Section 16.55.014, a site-specific soil and engineering geology report would be required for the proposed project to determine on-site geologic conditions and appropriate design parameters. The City Building Official or City Engineer would ensure incorporation of the soil and engineering geology report's recommended actions as a condition to the project's grading permit. Thus, upon implementation of the recommendations identified in the project's soil and engineering geology report, as required by the Municipal Code, impacts related to seismic-related ground failure would be less than significant.

iv. Landslides?

No Impact. According to the General Plan, the City does not have the potential for landslides. Further, the project site and surrounding areas are generally flat, and void of topographical features capable of producing a landslide. No impact would occur in this regard.

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

Less Than Significant Impact. Erosion is the natural movement of rock and soil from place to place. Common agents of erosion in the project region include wind and flowing water. Significant erosion typically occurs on steep slopes where stormwater and high winds can carry topsoil down hillsides. Erosion can be increased greatly by earthmoving activities if erosion-control measures are not used.

Construction Activities

Project grading activities would have the potential to result in soil erosion or loss of topsoil. However, soils would be balanced on-site (no soil import or export activities) and development of the project site is subject to local and State codes and requirements for erosion control and grading during construction. The project would be required to demonstrate compliance with the National Pollutant Discharge Elimination System (NPDES) permitting process to reduce short-term construction-related impacts, including the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP). The proposed project's construction contractor would be required to prepare and implement a SWPPP and associated best management practices (BMPs) in compliance with the Construction General Permit during grading and construction. Adherence to the BMPs in the



SWPPP would reduce, prevent, or minimize soil erosion from project-related grading and construction activities. The project would be required to comply with South Coast Air Quality Management District (SCAQMD) Rule 403, which would reduce the potential for wind erosion by requiring implementation of dust control measures during construction. Following compliance with the established regulatory framework (i.e., NPDES and SCAQMD Rule 403), project construction would result in less than significant impacts involving soil erosion and loss of topsoil.

Operational Activities

The project site is located within a highly urbanized area with minimal elevation changes. At project completion, the project site would be developed as a multi-family residential apartment community complete with landscape improvements and would not contain exposed soil. As a result, project operations would not result in substantial soil erosion or loss of topsoil and no impact would occur in this regard.

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

Less Than Significant Impact. Evaluation of liquefaction and landslides is provided in Responses 4.7(a)(iii) and (iv), respectively. Pursuant to Municipal Code Section 16.55.014, a site-specific soil and engineering geology report would be required for the proposed project to determine on-site geologic conditions and appropriate design parameters as they relate to lateral spreading, subsidence, and collapse. The City Building Official or City Engineer would ensure incorporation of the soil and engineering geology report's recommended actions as a condition to the project's grading permit. Thus, upon implementation of the recommendations identified in the project's soil and engineering geology report, as required by the Municipal Code, impacts related to unstable geologic units or soils would be less than significant.

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

Less Than Significant Impact. Expansive soils are found associated with soils, alluvium, and bedrock formations that contain clay minerals susceptible to expansion under wetting conditions and contraction under drying conditions. Depending upon the type and amount of clay present in a geologic deposit, these volume changes (shrink and swell) can cause severe damage to slabs, foundations, and concrete flatwork. Collapsible soils undergo a volume reduction when the pore spaces become saturated causing loss of grain-to-grain contact and possibly dissolving of interstitial cement holding the grains apart. The weight of overlying structures can cause uniform or differential settlements and damage to foundations and walls. Pursuant to Municipal Code Section 16.55.014, a site-specific soil and engineering geology report would be required for the proposed project to determine on-site geologic conditions and appropriate design parameters as they relate to expansive soils. The City Building Official or City Engineer would ensure incorporation of the soil and engineering geology report's recommended actions as a condition to the project's grading permit. Thus, upon implementation of the recommendations identified in the in the project's soil and



engineering geology report, as required by the Municipal Code, impacts related to expansive soils would be less than significant.

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

No Impact. No septic tanks or alternative wastewater disposal systems are proposed for the project. The proposed project would be connected to existing sewer mainlines and service lines, which are currently available in the project area. Therefore, no impact would occur in this regard.

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

Potentially Significant Impact. Although the project site is developed and located in an urbanized area of the City, construction activities associated with the project could impact previously undiscovered paleontological resources on-site. A Cultural/Paleontological Resources Assessment will be prepared and the project's potential impacts will be evaluated in the EIR.



4.8 GREENHOUSE GAS EMISSIONS

Would the project:

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

Potentially Significant Impact. Greenhouse gases (GHGs) are gases in the atmosphere that absorb and emit radiation from the sun. The main GHGs that are found in the earth's atmosphere are water vapor, carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), ozone (O₃), hydrofluorocarbons (HCFs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). Direct GHG emissions include emissions from construction activities, area sources, and mobile (vehicle) sources. Indirect GHG emissions are generated by incremental electricity consumption and waste generation. Because the proposed project could generate greenhouse gas emissions that may have a significant impact on the environment during both construction and operational activities, project-related GHG emissions will be quantified and analyzed in the EIR, to determine the significance of potential impacts.

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

Potentially Significant Impact. Refer to Response 4.8(a), above. Since the project could potentially result in impacts related to GHGs, further analysis will be provided in the EIR related to conflicts with plans, policies, or regulations reducing the emissions of GHGs.



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4.9 HAZARDS AND HAZARDOUS MATERIALS

Would the project:

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

Potentially Significant Impact. Exposure of the public or the environment to hazardous materials could occur through improper handling or use of hazardous materials or hazardous wastes particularly by untrained personnel, a transportation accident, environmentally unsound disposal methods, or fire, explosion, or other emergencies.

Demolition activities could expose the public and construction workers to hazardous substances such as asbestos or lead-based paints. Contaminated structures or soils (e.g., mold and lead) could also expose workers to health or safety risks. There is also a possibility of accidental release of hazardous substances, such as fuels, greases, paints, and cleaning materials during construction.

Hazardous materials associated with operational activities of the residential development would include minor cleaning products along with the occasional use of pesticides and herbicides for landscape maintenance. Thus, project operations could result in the accidental release of hazardous cleaning and landscape maintenance products.

Overall, construction and operational activities associated with the proposed project could cause a significant hazard to the public or environment through the routine use, transport, or disposal of hazardous materials. Potential impacts will be further analyzed in the EIR.

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

Potentially Significant Impact. Accidental conditions can arise as a result of routine transport, use, and/or storage of hazardous materials; refer to Response 4.9(a). Further, construction and operational activities could also result in accidental conditions involving associated with hazardous materials. Potential impacts will be evaluated in the EIR.

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

Potentially Significant Impact. Walter Elementary School is located 300 feet to the south of the project site at 10802 Rustic Lane in the City of Anaheim. The EIR will evaluate the project's potential impacts related to emitting hazardous emissions and handling hazardous materials, substances, or waste within one-quarter mile of an existing school.



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

No Impact. Government Code Section 65962.5 requires the Department of Toxic Substance Control and State Water Resources Control Board to compile and update a regulatory sites listing (per the criteria of the Section). The California Department of Health Services is also required to compile and update, as appropriate, a list of all public drinking water wells that contain detectable levels of organic contaminants and that are subject to water analysis pursuant to Section 116395 of the Health and Safety Code. Section 65962.5 requires the local enforcement agency, as designated pursuant to Section 18051 of Title 14 of the California Code of Regulations (CCR), to compile, as appropriate, a list of all solid waste disposal facilities from which there is a known migration of hazardous waste.

The project site is not listed pursuant to Government Code Section 65962.5.¹¹ Thus, no impact would result in this regard.

- e) ***For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?***

No Impact. The closest public use airport is the Fullerton Municipal Airport approximately 4.4 miles to the north of the project site. Given the distance, the project site is not located within the Fullerton Municipal Airport Impact Zone.¹² Thus, no impact would result in this regard.

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

Less Than Significant Impact. The City of Stanton does not have an adopted emergency response plan or emergency evacuation plan. However, the County of Orange Emergency Operations Center (EOC) functions as the communication and coordination center for the County and disaster preparedness, providing a central point for coordinating operational, administrative, and support needs of the County. It also assists in coordination and communication between the County and the State Office of Emergency Services during Countywide and Statewide emergency response and recovery operations. Construction and operations of the proposed residential development would not impair implementation of or physically interfere with the County-adopted emergency operations plans. Impacts would be less than significant in this regard.

¹¹ California Environmental Protection Agency, *Cortese Listing*, <https://calepa.ca.gov/sitecleanup/corteselist/>, accessed February 14, 2019.

¹² Orange County Airport Land Use Commission, *Airport Environs Land Use Plan for Fullerton Municipal Airport*, November 18, 2004, https://www.ocair.com/commissions/aluc/docs/FMA_AELUP-November-18-2004.pdf, accessed December 19, 2018.



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

No Impact. The project site consists of, and is surrounded by, urban/developed land; no areas of wildland are present in the project vicinity. Additionally, the California Department of Forestry and Fire Protection does not identify any Very High Fire Hazard Severity Zones in the City of Stanton.¹³ Therefore, project implementation would not expose people or structures to a significant risk involving wildland fires, and no impacts would occur in this regard.

¹³ California Department of Forestry and Fire Protection, *Orange County Very High Fire Hazard Severity Zones in LRA, As Recommended by CAL FIRE*, October 2011, http://frap.fire.ca.gov/webdata/maps/orange/fhszl_map.30.jpg, accessed December 19, 2018.



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4.10 HYDROLOGY AND WATER QUALITY

Would the project:

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

Potentially Significant Impact. As part of Section 402 of the Clean Water Act, the U.S. Environmental Protection Agency (EPA) has established regulations under the National Pollutant Discharge Elimination System (NPDES) program to control direct storm water discharges. In California, the State Water Regional Control Board (SWRCB) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The NPDES program regulates industrial pollutant discharges, which include construction activities. The SWRCB works in coordination with the Regional Water Quality Control Boards (RWQCB) to preserve, protect, enhance, and restore water quality. The project site is within the jurisdiction of the Santa Ana RWQCB.

Construction

Dischargers whose projects disturb one or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the SWRCB's General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility.

The General Construction Permit requires the project applicant to prepare and implement a storm water pollution prevent plan (SWPPP). The SWPPP would specify best management practices (BMPs) to be used during construction of the project to minimize or avoid water pollution. These BMPs would include measures to contain runoff from vehicle washing at the construction site, prevent sediment from disturbed areas from entering the storm drain system using structural controls (i.e., sand bags at inlets), and cover and contain stockpiled materials to prevent sediment and pollutant transport. Implementation of the BMPs would ensure runoff and discharges during the project's construction phase would not violate any water quality standards.

The Applicant would be required to prepare a Notice of Intent for submittal to the Santa Ana RWQCB providing notification of intent to comply with the General Construction Permit. Additionally, the SWPPP would be required to be reviewed/approved by the City (or designee), for water quality construction activities on-site. Compliance with NPDES requirements would reduce short-term construction-related impacts to water quality to a less than significant level.



Operations

The project would be regulated under the NPDES Phase I Municipal Stormwater Permits issued by the Santa Ana RWQCB for Orange County. Since 1990, operators of municipal separate storm sewer systems are required to develop a stormwater management program designed to prevent harmful pollutants from impacting water resources via stormwater runoff. The Orange County Stormwater Program (Stormwater Program) is a cooperative of the County of Orange, Orange County Flood Control District (OCFCD), and all 34 Orange County cities. As the Principal Permittee on the Santa Ana RWQCB NPDES permits, the County guides development and implementation of the Stormwater Program, collaborating regularly with co-permittees to ensure compliance and prevent ocean pollution.

The Stormwater Program's specific water pollutant control elements are documented in the Drainage Area Management Plan (DAMP). The DAMP satisfies the NPDES permit conditions for creating and implementing an Urban Runoff Management Program (URMP). The intent of an URMP is to reduce pollutant discharges to the maximum extent practicable (MEP) for the protection of water quality at receiving water bodies and the support of designated beneficial uses. The DAMP contains guidance on both structural and nonstructural BMPs for meeting these goals. With implementation of the DAMP requirements (as required by Municipal Code Chapter 6.20.040, *Control of Urban Runoff*), the project would be required to prepare a Water Quality Management Plan (WQMP) in accordance with the requirements of the NPDES standards. The WQMP would specify BMPs to be used in project design and project operation to minimize operational water quality impacts. As such, potential impacts in this regard will be further analyzed within the EIR.

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

Potentially Significant Impact. The project site is built out with 28 single-story four-plex apartment buildings, the Illuminations Foundation Children's Resource Center, a community garden, a portable building, and several vacant (disturbed) lots. There are no designated groundwater recharge basins or infrastructure in the project area. However, the EIR will analyze whether there is sufficient groundwater supply to meet the project's estimated water demand or whether new or expanded entitlements would be needed; refer to Response 4.18(d).

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

- i) Result in substantial erosion or siltation on- or off-site?***

Potentially Significant Impact. In long-term operational conditions, the entire site would be covered with buildings, landscaped areas, and hardscape improvements, and no bare soil would be left vulnerable to erosion or siltation on- or off-site. However, construction activities could



result erosion or siltation impacts (i.e., when soils are exposed during earthwork). As such, potential impacts in this regard will be further analyzed within the EIR.

ii) *Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site?*

Potentially Significant Impact. The project site does not contain any streams, rivers, or other drainage features, and is currently developed with 28 single-story four-plex apartment buildings, the Illuminations Foundation Children’s Resource Center, a community garden, a portable building, and several vacant (disturbed) lots. At project completion, the site would mostly be developed with impervious surfaces with the exception of landscaped areas and recreational spaces. The EIR will evaluate whether project development would result in flooding on- or off-site due to an increase in surface runoff.

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

Potentially Significant Impact. Refer to Responses 4.10(a) and 4.10(c)(ii). Further analysis will be required in the EIR to address stormwater runoff impacts related to the project. As part of the analysis in the EIR, the capacity of the existing stormwater drainage system down-gradient of the project site will be considered.

iv) *Impede or redirect flood flows?*

Potentially Significant Impact. Refer to Response 4.10(c)(ii) and 4.10(c)(iii).

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

No Impact.

Flood Hazard

According to the Federal Emergency Management Agency (FEMA) flood hazard maps, the project site is designated as Zone X.¹⁴ Zone X is located outside of the special flood hazard areas subject to inundation by the one percent annual chance of flood (100-year floodplain), and no floodplain management regulations are required. Further, according to the General Plan, no areas within the City are located within a 100-year flood zone. As a result, no impacts would occur in this regard.

¹⁴ Federal Emergency Management Agency, *FEMA Flood Map Service Center*, <https://msc.fema.gov/portal/search?AddressQuery=stanton%2C%20ca#searchresultsanchor>, accessed December 6, 2018.



Tsunami

A tsunami is a sea wave caused by a sudden displacement of the ocean floor, most often due to earthquakes. The project site is located approximately 8.3 miles inland of the Pacific Ocean. Thus, project implementation would not subject people or structures to risk of tsunami inundation and no impacts would occur.

Seiche

A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. There are no water bodies in the project area that could pose a flood hazard due to a seiche. No impact would occur in this regard.

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

Potentially Significant Impact. The *Santa Ana River Basin Water Quality Control Plan* (Basin Plan) establishes water quality standards for ground and surface waters within the Santa Ana River Basin, which includes the City, and is the basis for the Santa Ana RWQCB's regulatory programs.

The 2014 Sustainable Groundwater Management Act requires local public agencies and groundwater sustainability agencies in high- and medium-priority basins to develop and implement groundwater sustainability plans (GSPs) or prepare an alternative to a GSP. The City is located within the Coastal Plan of Orange County groundwater basin, which is designated as a medium-priority basin and regulated by the Orange County Water District (OCWD).¹⁵ OCWD, in conjunction with the City of La Habra and Irvine Ranch Water District, prepared the *Basin 8-1 Alternative*, which is functionally equivalent to a GSP and sets forth basin management goals and objectives and describes how the basin is managed, including a description of basin hydrogeology, water supply monitoring programs, management and operation of recharge facilities, water quality protection and management, and natural resource and collaborative watershed programs.

The EIR will analyze whether development of the project would conflict or obstruct implementation of the Basin Plan or *Basin 8-1 Alternative*.

¹⁵ California Department of Water Resources, *SGMA Portal GSA Map Viewer*, <https://sgma.water.ca.gov/webgis/index.jsp?appid=gasmaster&rz=true>, accessed January 24, 2019.



4.11 LAND USE AND PLANNING

Would the project:

a) *Physically divide an established community?*

No Impact. The proposed project would not physically divide an established community. The adjacent single-family residences to the north, east, and west are already physically separated from the project site by Tina Way, Magnolia Avenue, and Sherrill Street, respectively. A nursery currently occupies land to the south of the project site, and commercial uses are located to the east across Magnolia Avenue. Thus, development of the proposed project would not physically divide an established community, and no impacts would occur in this regard.

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

Less Than Significant Impact.

General Plan Consistency

Based on the General Plan Land Use Map, the site is designated High Density Residential. The General Plan intends High Density Residential areas for the development of multi-family neighborhoods that provide a variety of housing types, with particular emphasis on ownership, and with provision for affordable housing. Densities range from 11.1 to 18 dwelling units per acre with an allowed density bonus of up to 35 percent (above the 18 dwelling units per acre) if developments provide affordable housing for low- and moderate-income households. The proposed affordable housing development would be permitted under the current General Plan land use designation. Thus, no General Plan Amendment would be required, and the project would be consistent with the General Plan.

Table 4.11-1, *General Plan Community Development Chapter Strategy Consistency Analysis*, analyzes the project's consistency with relevant General Plan Community Development Chapter (the City's Land Use Element) goals and strategies. As demonstrated in Table 4.11-1, the project is consistent with the relevant General Plan Community Development Chapter goals and strategies.



**Table 4.11-1
General Plan Community Development Chapter Strategy Consistency Analysis**

Relevant General Plan Community Development Chapter Strategies	Project Consistency Analysis
<u>Goal LU-1.1:</u> Create an economic and fiscal balance of residential, commercial, and industrial uses.	
<u>LU-1.1.1:</u> Encourage land uses which maximize economic development and enhance the quality of life.	<u>Consistent.</u> The proposed project would revitalize a blighted neighborhood by redeveloping the site into a 161-unit affordable housing development. The project would be developed in accordance with the existing High Density Residential land use designation for the site and would provide various residential amenities. Under Development Option One, amenities would include a community center, two tot lots, and several landscaped pedestrian walkways between the proposed residential buildings. Development Option Two would provide the same amenities as Development Option One as well as a community pool, pre-kindergarten school site, and an additional tot lot. Compared to existing conditions, the project would enhance the use of the site and quality of life for future on-site residents as well as residents of the adjacent residential communities. The proposed neighborhood would also contribute towards the City's economic development in providing new housing and introducing new residents to Stanton.
<u>LU-1.1.2:</u> Ensure adjacent land uses are compatible with one another.	<u>Consistent.</u> The proposed multi-family residential development would be compatible with adjacent uses, including single-family residences to the north, east, and west, as well as commercial uses to the east. The project would be consistent with the existing High Density Residential designation for the site, and thus, would remain consistent with adjacent land uses as planned under the General Plan.
<u>Goal LU-3.1:</u> A range and balance of residential densities which are supported by adequate city services.	
<u>LU-3.1.1:</u> Preserve single-family residential neighborhoods.	<u>Consistent.</u> The project site is currently developed with multi-family residential uses and is designated High Density Residential. As such, the project would not result in the loss of any single-family residential neighborhoods.
<u>Goal LU-4.1:</u> Ensure the continued revitalization within the existing redevelopment project area.	
<u>LU-4.1.1:</u> Maintain commitment to revitalizing commercial and residential properties within the redevelopment project area.	<p><u>Consistent.</u> The General Plan was adopted in 2008 prior to the dissolution of the Stanton Redevelopment Agency in February 2012 in accordance with AB1X 26. As such, this strategy is related to the City's redevelopment efforts prior to 2012.</p> <p>Nevertheless, the project site was an identified redevelopment area within Stanton. As detailed in Section 2.3, Background and History, from 2009 to 2012, the Stanton Redevelopment Agency purchased 25 of the 40 parcels on-site in an effort to redevelop the neighborhood. When AB1X 26 passed, the Stanton Redevelopment Agency was dissolved, and the City lost funding to acquire the remaining parcels on-site. With the recent sale of a Stanton Housing Authority property, successor to the Stanton Redevelopment Agency for housing related activities, additional funding for the proposed project was identified. The Stanton Housing Authority has partnered with a developer to complete the acquisition of the remaining 15 parcels, relocate all remaining tenants, and develop a 161-unit affordable housing project. As such, the City has maintained its commitment to revitalizing the project site with the proposed project.</p>



Table 4.11-1, continued

Relevant General Plan Community Development Chapter Strategies	Project Consistency Analysis
<p><u>Goal LU-4.2:</u> Encourage greater property owner participation in the revitalization process.</p>	
<p><u>LU-4.2.1:</u> Broaden the scope of revitalization efforts to include as many strategies and programs as is feasible to encourage the participation of property and business owners.</p>	<p><u>Consistent.</u> Similar to Strategy LU-4.1.1, this strategy is related to the City’s redevelopment efforts prior to the dissolution of the Stanton Redevelopment Agency per AB1X 26. As such, this strategy is not applicable to the project.</p> <p>Nevertheless, the environmental clearance process under the California Environmental Quality Act (CEQA) requires and promotes public participation in the environmental review of projects. As required under CEQA Guidelines Section 15105, the EIR for this project will be made available for a 45-day public review period during which the public, including property and business owners in the project area, can review and provide comments on the document. Subsequent public meetings and hearings conducted as part of the CEQA process would also provide opportunity for public commenting.</p>
<p><u>Goal LU-7.1:</u> Provide infrastructure to create foundation for future development.</p>	
<p><u>LU-7.1.1:</u> Ensure a rational nexus with the public infrastructure and services created by the new development.</p>	<p><u>Consistent.</u> Any infrastructure improvements required to serve the proposed multi-family residential development would be determined in consultation with the City and would be based on technical analyses that identify a rational nexus between the project and any infrastructure improvements. For example, a Traffic Impact Analysis will be prepared in support of the EIR that identifies the project’s potential impacts to the level of service of existing intersections and roadways and required improvements (if any), in the form of mitigation measures, to reduce such impacts to less than significant levels.</p>
<p><u>LU-7.1.2:</u> Ensure adequate funding for the financing of public facilities and capital improvements related to new development.</p>	<p><u>Consistent.</u> The proposed project would be required to pay development impact fees associated with new development, including parkland fees in accordance with Municipal Code Chapter 19.42, <i>Dedication of Land for Park Facilities and Payment of In Lieu Fees</i>, and drainage fees pursuant to Municipal Code Section 19.18.020, <i>Drainage Fees</i>.</p>

Zoning Code Consistency

According to the City’s Zoning Map, the site is zoned High Density Residential (RH). Per Municipal Code Section 20.210.010(D), *High Density Residential (RH) Zone*, the RH zone is intended for a variety of multi-family attached housing types as well as accessory structures and uses, primarily located on larger lots along arterial highways. The RH zone may also allow nonresidential uses that complement and serve the immediate neighborhood, including schools, parks, libraries, and public facilities. Quasi-residential uses (e.g., convalescent hospitals, supportive housing, and transitional housing) are also allowed. In accordance with the General Plan Housing Element *Residential Land Resources Appendix* and California Government Code Section 65583.2, properties in the RH zone may be developed at a net density of thirty dwelling units per acre or greater in order to meet lower income growth needs. The proposed multi-family affordable housing development would be permitted under the existing RH zone and would not require a Zone Change.



Municipal Code Section 20.210.030, *Residential Zone Development Standards*, identifies development standards specific to residential zones within the City. Table 4.11-2, *Development Standards Consistency Analysis*, details the project’s consistency with applicable development regulations.

**Table 4.11-2
Development Standards Consistency Analysis**

Development Standard	High Density Residential (RH) Zoning Requirement ^{1, 2}	Proposed Project	Does Project Satisfy Requirement?
Density	11.1 to 18.0 dwelling units per acre	Based on the site’s maximum permitted density of 18.0 dwelling units per acre, the 10.27-acre project site is allowed a maximum of 184 units on-site. The project proposes 161 units.	Yes
Setbacks			
Street Side	10 feet or 10 percent of lot width, whichever is greater, up to 20 feet maximum	20 feet	Yes
Rear	One-story: 15 feet Two-story: 20 feet Three-story: 25 feet	20 feet	Yes
Maximum Building Height	Three stories (40 feet maximum)	27 to 29 feet	Yes
Impervious Surface Coverage	70 percent (maximum percentage of total gross lot area that may be covered by structures and impervious surfaces)	60 percent	Yes
Landscape Requirement	Remaining percentage of total gross lot area not covered by impervious surfaces (e.g., 30 percent if impervious surfaces cover the maximum 70 percent allowed)	40 percent	Yes
Parking Spaces	0 to 1-bedroom: 1 space 2 to 3-bedroom: 2 spaces 4+ bedroom: 2.5 parking spaces	322 residential spaces and 32 guest spaces	Yes

Source:

¹ City of Stanton, *Stanton Municipal Code*, Section 20.210.030, *Residential Zone Development Standards*, 2018.

² City of Stanton, *Stanton Municipal Code*, Section 20.330.040, *Concessions and/or Incentives*, 2018.

As shown in Table 4.11-2, the project would be consistent with applicable development standards. Additionally, the discretionary actions required by the City include a Precise Plan of Development, Tentative Tract Map, Street Vacation, Conditional Use Permit, and Density Bonus Concession as detailed below.

Precise Plan of Development. The proposed project requires a Precise Plan of Development associated with the project’s site plan and design review application. As part of the review, the City is required to make a number of findings, including, but not limited to, determining whether the project is allowed within the subject zone; the project is designed so that the project is not a detriment to the public health, safety, or general welfare; proposed structures and improvements are suitable for the site; the site plan and design is consistent with the City’s Design Standards and Guidelines; and the



project is designed compliant with the City's Zoning Code, Municipal Code Title 16, *Buildings and Construction*, and all other applicable City regulations and policies. City approval of the site plan and design review application would ensure the project's requested Precise Plan of Development entitlement.

Tentative Tract Map. Municipal Code Chapter 19.10, *Tentative Maps; Procedures*, details the procedures required to file and obtain approval for tentative parcel maps and tentative tract maps. The project is requesting a Tentative Tract Map to subdivide the site's parcels appropriately to develop the proposed 161-unit multi-family residential development. The proposed tentative tract map would be approved by the City based on the findings that the map and proposed design and improvements of the project is consistent with the General Plan; the site is physically suitable for the proposed development and density; the requirements under CEQA have been satisfied; and the design of the project would not cause substantial environmental damage or serious public health problems, among other findings detailed in Section 19.10.100, *Findings Required*. Approval of the proposed Tentative Tract Map for the subdivision of the project site would result in the project's compliance with Municipal Code Chapter 19.10.

Street Vacation. The project proposes to vacate Pacific Avenue, Tina Way, and the two public alleyways on-site to develop the proposed multi-family neighborhood. The proposed street vacations are required to be shown on the Tentative Tract Map and would be reviewed by the City concurrently with the Tentative Tract Map during site plan and design review. Upon approval of the proposed Tentative Tract Map, the Street Vacation would also be approved.

Conditional Use Permit. A Conditional Use Permit is required as the application mechanism to consider the density bonus concession detailed below.

Density Bonus Concession. As a multi-family development with 100 percent restricted affordable units, the project qualifies for by-right parking incentives per Municipal Code Section 20.330.040, *Concessions and/or Incentives*. Thus, the parking incentive allowed under the Density Bonus Concession would be processed with the Conditional Use Permit.

Based on the analysis above, the proposed project would not conflict with goals and policies in the General Plan or applicable regulations under the Zoning Code. As such, the project would result in less than significant impacts in this regard.



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4.12 MINERAL RESOURCES

Would the project:

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

No Impact. Areas designated by the California Geological Survey as Mineral Resource Zone (MRZ) 2 are areas where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists. The project site is not mapped as MRZ 2, instead it is mapped as MRZ 4, which is defined as areas where available information is inadequate for assignment to any other MRZ.¹⁶ Additionally, the project site is currently developed with 28 existing fourplex apartment buildings, the Illuminations Foundation Children's Resource Center, a community garden, a portable building, and several vacant lots from previously demolished residential buildings, and thus, is not available as a mining site. As such, project development would not cause the loss of availability of mineral resources valuable to the region and State, and no impact would occur.

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

No Impact. Refer to Response 4.12(a).

¹⁶ California Department of Conservation, *Mineral Land Classification Map Aggregate Resources Only, Anaheim Quadrangle*, 1981, ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_143/PartIII/Plate_3-18.pdf, accessed December 4, 2018.



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4.13 NOISE

Would the project result in:

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

Potentially Significant Impact. Noise from project-related construction activities would be generated by two primary sources: 1) the transport of workers and equipment to and from the construction site; and 2) the noise related to active construction equipment and operations. These noise sources could result in impacts to nearby sensitive receptors.

The project would also generate long-term operational noise through new stationary and mobile noise sources associated with the proposed residential development (e.g., vehicular traffic; heating, cooling, and ventilation [HVAC] units; and landscaping maintenance). The EIR will evaluate the existing noise environment and the potential for project-generated noise to substantially increase existing noise levels at surrounding land uses. The EIR will assess project-related noise environments with respect to applicable noise standards.

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

Potentially Significant Impact. Groundborne vibration or noise would primarily be associated with demolition and construction activities. These temporary increased levels of vibration could impact vibration-sensitive land uses surrounding the project site and will be evaluated in the EIR.

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

No Impact. The closest private airstrip to the project site is the Joint Forces Training Base (JFTB) Los Alamitos, which includes the Los Alamitos Army Airfield in the City of Los Alamitos approximately 3.5 miles to the southwest of the site. Given the distance, the project would not expose future residents to excessive noise levels associated with the Los Alamitos Army Airfield. No impacts would occur.



The closest public use airport is the Fullerton Municipal Airport approximately 4.4 miles to the north of the project site. Given the distance, the project site is not located within the Fullerton Municipal Airport Impact Zone.¹⁷ Thus, no impact regarding excessive airport noise levels would occur.

¹⁷ Orange County Airport Land Use Commission, *Airport Environs Land Use Plan for Fullerton Municipal Airport*, November 18, 2004, https://www.ocair.com/commissions/aluc/docs/FMA_AELUP-November-18-2004.pdf, accessed December 19, 2018.



4.14 POPULATION AND HOUSING

Would the project:

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

Potentially Significant Impact. A project could induce population growth in an area either directly, through the development of new residences or businesses, or indirectly, through the extension of roads or other infrastructure. The project involves the demolition of 28 fourplex apartment buildings (112 units) and the construction of 161 new multi-family units in its place. As part of the project, the City is also proposing to relocate all existing tenants. It is speculative at this point to determine whether all existing residents on-site would relocate within, or outside of, the City. Thus, this analysis conservatively assumes the existing residents could relocate elsewhere within the City, thereby resulting in a net increase of 161 units. As such, project implementation could induce direct population growth in the City through development of new residences. The EIR will evaluate the project's impacts related to population growth.

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

Potentially Significant Impact. The City is proposing to acquire the 15 remaining parcels not currently owned by the City and to relocate all existing tenants on-site in order to construct the multi-family residential development. Therefore, the project would displace all 112 units and their residents. The tenant relocation and property acquisition process will be evaluated as part of the project in the EIR.



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4.15 PUBLIC SERVICES

Would the project:

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

i. *Fire protection?*

Potentially Significant Impact. The proposed project would introduce 161 multi-family residential apartment units. Based on the City's average household size of 3.58, the project would introduce up to 576 new residents on-site.¹⁸ The Orange County Fire Authority (OCFA) will be contacted to confirm relevant existing conditions, project impacts, and recommended mitigation measures. The discussion will focus on the potential alteration of existing facilities, extension, or expansion of new facilities, and the increased demand on services based on the proposed land use. The EIR will evaluate the ability of the project to receive adequate service based on applicable City standards and, where adequate services are not available, will identify the effects of inadequate service, and recommended mitigation measures if necessary.

ii. *Police protection?*

Potentially Significant Impact. Based on the City's average household size of 3.58, the project would introduce up to 576 new residents on-site. The Orange County Sheriff's Department (OCSD) will be contacted to confirm relevant existing conditions, project impacts, and recommended mitigation measures as they relate to police protection services. The discussion will focus on the potential alteration of existing facilities, extension, or expansion of new facilities, and the increased demand on police protection services based on the proposed land use. The EIR will evaluate the ability of the project to receive adequate service based on applicable City standards and, where adequate services are not available, will identify the effects of inadequate service, and recommended mitigation measures if necessary.

iii. *Schools?*

Potentially Significant Impact. Based on the City's average household size of 3.58, the project would introduce up to 576 new residents on-site. The project site is served by the Magnolia School District (MSD) and Anaheim Union High School District (AUHSD). The MSD and AUHSD will be contacted to confirm relevant existing conditions, project impacts, and recommended

¹⁸ California Department of Finance, *Report E-5: Population and Housing Estimates for Cities, Counties, and the State, January 1 2011-2018, with 2010 Benchmark*, May 2018.



mitigation measures as they relate to school services. The discussion will focus on the potential alteration of existing facilities, extension, or expansion of new facilities, and the increased demand on MSD schools based on the proposed land use. The EIR will evaluate the ability of the project to receive adequate service based on applicable City standards and, where adequate services are not available, will identify the effects of inadequate service, and recommended mitigation measures if necessary.

iv. Parks?

Less Than Significant Impact. The City does not have a parkland-to-population standard; however, the General Plan notes that while the City may not realistically be able to meet the Quimby Act's standard of 3.0 acres per 1,000 residents, the City has a goal of providing facilities to meet community demand. Currently, the City owns and operates ten parks that total 37.11 acres.¹⁹ Based on the City's existing population of 39,470, the existing parkland to population ratio is 1.06 acres per 1,000 residents.²⁰

Based on the City's average household size of 3.58, the project would introduce up to 576 new residents on-site. As a result, the project would have a parkland demand of 1.73 acres, based on the State's standard of 3.0 acres per 1,000 residents. Additionally, the population demand associated with the proposed project could increase the use of existing neighborhood and regional parks and other recreational facilities.

It should be noted that a variety of private residential open space would be distributed throughout the project site. Development Option One would include several recreational amenities on-site, including a community center, two tot lots, and several landscaped pedestrian walkways between the proposed residential buildings; refer to Exhibit 2-3a, Conceptual Site Plan – Development Option One. Development Option Two would include those same amenities with the addition of a preschool facility and one additional tot lot along Magnolia Avenue along with a pool at the community center; refer to Exhibit 2-3b, Conceptual Site Plan – Development Option Two.

Due to the amount and variety of open spaces provided by the project, it is not anticipated that project residents would use external parks and recreational facilities such that substantial physical deterioration would occur or be accelerated. Nonetheless, Municipal Code Chapter 19.42, *Dedication of Land for Park Facilities and Payment of In-Lieu Fees*, requires that developments involving tentative maps, tentative parcel maps, or condominium projects consisting of 51 or more dwelling units dedicate land to the City for park facilities and/or pay in lieu fees. Compliance with Municipal Code Chapter 19.42 would ensure the project's impacts concerning parks and recreational facilities and increased use of existing facilities would be less than significant.

¹⁹ City of Stanton Website, *Parks and Facilities*, <http://ci.stanton.ca.us/Departments/Community-Services/Parks-and-Facilities>, accessed December 12, 2018.

²⁰ California Department of Finance, *Report E-5: Population and Housing Estimates for Cities, Counties, and the State, January 1 2011-2018, with 2010 Benchmark*, May 2018.



v. Other public facilities?

Potentially Significant Impact. Based on the City's average household size of 3.58, the project would introduce up to 576 new residents on-site. Library services for the City are provided by the Orange County Public Libraries (OCPL). The EIR will confirm relevant existing conditions, project impacts, and recommended mitigation measures as they relate to library services. The discussion will focus on the potential alteration of existing facilities, extension, or expansion of new facilities, and the increased demand on library services based on the proposed land use. The EIR will evaluate the ability of the project to receive adequate service based on applicable City standards and, where adequate services are not available, will identify the effects of inadequate service, and recommended mitigation measures if necessary.



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4.16 RECREATION

Would the project:

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

Less Than Significant Impact. Refer to Response 4.15(a)(iv).

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

Less Than Significant Impact. Refer to Response 4.15(a)(iv). Development Option One would include several recreational amenities on-site, including a community center, two tot lots, and several landscaped pedestrian walkways between the proposed residential buildings; refer to Exhibit 2-3a, Conceptual Site Plan – Development Option One. Development Option Two would include those same amenities with the addition of a preschool facility and one additional tot lot along Magnolia Avenue along with a pool at the community center; refer to Exhibit 2-3b, Conceptual Site Plan – Development Option Two. The project is not anticipated to require the construction of new or expansion of existing recreational facilities in the project area. As such, impacts would be less than significant in this regard.



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4.17 TRANSPORTATION

Would the project:

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

Potentially Significant Impact. The project site is located adjacent to a number of existing transportation facilities. Bus stops located along Magnolia Avenue and Katella Avenue are served by the Orange County Transportation Authority. While there are no bicycle lanes along Magnolia Avenue, Tina Way, Pacific Avenue, or Sherrill Street, there are pedestrian sidewalks along these roadways. The project proposes to vacate Pacific Avenue, Tina Way, and two public alleyways on-site, which would remove pedestrian facilities (i.e., sidewalks). The project's potential impacts to existing transportation facilities will be further analyzed in the EIR.

- b) ***Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?***²¹

Potentially Significant Impact. The project may result in temporary short-term traffic impacts during construction activities, particularly along Magnolia Avenue. Operational traffic impacts may also occur due to an increase in vehicle trips in the project area associated with the proposed residential development. A Traffic Impact Analysis will be prepared to assess existing traffic conditions, forecast project-generated traffic volumes and distribution, and forecast traffic conditions in the project buildout year with and without the project. Impacts related to compliance with plans and policies that establish measures of effective performance of the circulation system will be discussed in more detail in the EIR.

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

Potentially Significant Impact. While the project would not introduce incompatible uses to the area roadways, the project proposes to vacate Pacific Avenue, Tina Way, and two public alleyways on-site. The project proposes new ingress/egress points to the site along Magnolia Avenue and Sherrill Street. As shown on Exhibits 2-3a, Conceptual Site Plan – Development Option One, and 2-3b, Conceptual Site Plan – Development Option Two, vehicular access to the project site would be provided from one main gated entry along Magnolia Avenue with one gated egress point at the northwest corner of the site towards Sherrill Street. Emergency vehicle access would be provided

²¹ While this Appendix G Checklist Question has been modified by the Natural Resources Agency to address consistency with CEQA Guidelines section 15064.3, subdivision (b), which relates to use of the vehicle miles traveled (VMT) as the methodology for evaluating traffic impact, the City has not yet adopted a VMT methodology to address this updated Appendix G Checklist Question. Thus, the analysis is based on the City's adopted traffic analysis methodology, which requires use of level of service to evaluate traffic impacts of a project.



via a gated entryway at the northeast corner of the site along Magnolia Avenue with two gated egress points in the southwest corner of the site. The EIR will evaluate the project's traffic hazard impacts related to the project's internal circulation and ingress/egress points.

d) Result in inadequate emergency access?

Potentially Significant Impact. As stated above, vehicular access to the project site would be provided from one main gated entry along Magnolia Avenue with one gated egress point at the northwest corner of the site towards Sherrill Street. Emergency vehicle access would be provided via a gated entryway at the northeast corner of the site along Magnolia Avenue with two gated egress points in the southwest corner of the site; refer to Exhibits 2-3a and 2-3b. The EIR will evaluate the project's potential impacts related to emergency access.



4.18 TRIBAL CULTURAL RESOURCES

As of July 1, 2015, California Assembly Bill 52 (AB 52) was enacted and expanded CEQA by establishing a formal consultation process for California tribes within the CEQA process. The bill specifies that any project may affect or cause a substantial adverse change in the significance of a tribal cultural resource would require a lead agency to “begin consultation with a California Native American tribe that is traditional and culturally affiliated with the geographic area of the proposed project.” Section 21074 of AB 52 also defines a new category of resources under CEQA called tribal cultural resources.” Tribal cultural resources are defined as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe” and is either listed on or eligible for the California Register of Historical Resources or a local historic register, or if the lead agency chooses to treat the resource as a tribal cultural resource.

On February 19, 2016, the California Natural Resources Agency proposed to adopt and amend regulations as part of AB 52 implementing Title 14, Division 6, Chapter 3 of the California Code of Regulations, CEQA Guidelines, to include consideration of impacts to tribal cultural resources pursuant to Government Code Section 11346.6. On September 27, 2016, the California Office of Administrative Law approved the amendments to Appendix G of the CEQA Guidelines, and these amendments are addressed within this Initial Study.

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

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

Potentially Significant Impact. Refer to Response 4.5(a). Existing residential buildings on-site planned for demolition could have historic significance. A Cultural/Paleontological Resources Assessment, including a historic evaluation, will be prepared to analyze potential project impacts to historic resources. Additionally, pursuant to AB 52, the City will consult with Native American tribes to determine whether the project would impact any known tribal cultural resources in the project area. Potential impacts in this regard will be further analyzed in the EIR.

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

Potentially Significant Impact. Refer to Response 4.18(a)(i). Although the project area is developed and urbanized, previously undiscovered or unknown tribal cultural resources could potentially be affected during ground-disturbing activities (i.e., grading and excavation). In compliance with AB 52, the City distributed letters on February 4, 2019 to potentially affected tribes for consultation regarding the proposed project. The EIR will include further analysis related to resources potentially affected by the project that may be subject to criteria set forth in Public Resources Code Section 5024.1(c).



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4.19 UTILITIES AND SERVICE SYSTEMS

Would the project:

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

Potentially Significant Impact.

Water

Water services in Stanton are provided by the Golden State Water Company's (GSWC) West Orange County System (WOCS). The WOCS will be contacted to confirm relevant existing conditions, potential project impacts, and recommended mitigation measures. The analysis will focus on the project's anticipated water demand and whether existing water supply sources and facilities would be able to accommodate such demand and, where adequate services are not available, will identify the effects of inadequate service, and recommended mitigation measures.

Wastewater

The City's wastewater collection system is maintained by the Public Works Department's Sewer Maintenance Program and wastewater flow is treated at the Orange County Sanitation District (OCSD) Reclamation Plant No. 1 in Fountain Valley and Reclamation Plant No. 2 in Huntington Beach. The EIR will analyze the proposed project's net increase in wastewater generation compared to the site's existing uses. The OCSD will also be contacted to confirm relevant existing conditions, potential project impacts, and recommended mitigation measures. Potential impacts will be further evaluated in the EIR.

Stormwater Drainage

The Engineering Division of the Public Works Department owns and maintains the storm drains within the City limits. Redevelopment of the project site into the proposed residential apartment community could change runoff rates or volumes that could result in adverse impacts to existing storm drain capacities. The EIR will evaluate whether new or expanded storm drain facilities would be required to accommodate the proposed project.

Dry Utilities

Electricity, natural gas, and telecommunication facilities in Stanton are provided by Southern California Edison, Southern California Gas, and Frontier Communication or AT&T, respectively. Future residents of the proposed project would utilize these existing services and would be required to pay applicable connection and service fees. Additionally, pursuant to Municipal Code Chapter 3.24, *Utility User Tax*, future residents would be required to pay utility user taxes for electricity, natural



gas, and telephone services for general governmental purposes of the City. As these utility facilities are already present and serving the existing residents on-site, impacts to dry utility providers would be less than significant.

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

Potentially Significant Impact. As discussed in Response 4.19(a), water supplies for the City are provided by the WOCS. Utilizing WOCS' *2015 Urban Water Management Plan*, the EIR will analyze whether there is sufficient water supply to meet the project's estimated water demand in addition to reasonably foreseeable future development during normal, dry, and multiple dry years. Potential impacts will be further evaluated in the EIR.

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

Potentially Significant Impact. Refer to Response 4.19(a). The EIR will analyze whether the OCSD has adequate capacity to serve the project plus existing commitments.

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

Less Than Significant Impact. Solid waste collection services in Stanton are contracted with CR&R, Incorporated, which operates Stanton Disposal Services. In 2017, the City disposed over 97 percent of its solid waste at the Frank R. Bowerman Sanitary Landfill at 11002 Bee Canyon Access Road in the City of Irvine.¹ The Frank R. Bowerman Sanitary Landfill has a maximum permitted throughput of 11,500 tons per day, remaining capacity of 205,000,000 cubic yards, and anticipated closure date of 2053.²

Construction

The proposed project would require demolishing the existing residential units and the disposal of all construction/demolition debris (soil, asphalt, demolished materials, etc.) during the construction process. The construction/demolition debris would occur once and would not have the capability to substantially affect the capacity of regional landfills. As stated, the Frank R. Bowerman Sanitary Landfill has a remaining capacity of 205,000,000 cubic yards, which would adequately accommodate project-generated construction waste.

¹ California Department of Resources Recycling and Recovery, *Jurisdiction Disposal by Facility, Disposal during 2017 for Stanton*, <https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility>, accessed February 14, 2019.

² California Department of Resources Recycling and Recovery, SWIS Facility Detail: Frank R. Bowerman Sanitary LF (30-AB-0360), <https://www2.calrecycle.ca.gov/swfacilities/Directory/30-AB-0360/>, accessed February 14, 2019.



Further, all construction activities would be subject to conformance with relevant Federal, State, and local requirements related to solid waste disposal. Specifically, the project would be required to demonstrate compliance with the California Integrated Waste Management Act of 1989 (AB 939), which requires all California cities to “reduce, recycle, and re-use solid waste generated in the State to the maximum extent feasible.” The California Integrated Waste Management Act of 1989 requires that at least 50 percent of waste produced is recycled, reduced, or composted. The project would also be required to demonstrate compliance with the 2016 (or most recent) Green Building Code, which includes design and construction measures that act to reduce construction-related waste through material conservation measures and other construction-related efficiency measures. Compliance with these programs would ensure the project’s construction-related solid waste impacts would be less than significant.

Operation

Based on a multi-family residential solid waste generation rate of 4 pounds per household per day,³ the existing 110 occupied units on-site would generate approximately 440 pounds per day (ppd) of solid waste. Assuming the highest density development option is constructed, Development Option Two would introduce 161 multi-family units and a 2,300-square foot preschool facility. As such, Development Option Two would generate approximately 660 ppd of solid waste. Therefore, the net increase in solid waste generated on-site would be approximately 220 ppd; refer to Table 4.19-1, Project-Generated Solid Waste.

As stated above, the Frank R. Bowerman Sanitary Landfill has a maximum daily throughput and remaining capacity substantially greater than the project’s net increase in solid waste generation of 220 ppd. As such, operational solid waste impacts would be less than significant.

**Table 4.19-1
Project-Generated Solid Waste**

Land Use	Amount	Solid Waste Generation Rate ¹	Generated Solid Waste (ppd)
Existing Uses			
Residential	110 units	4 pounds per household per day	440
<i>Existing Solid Waste Generation</i>			440
Proposed Project (Development Option Two)			
Residential	161 units	4 pounds per household per day	644
Preschool (Institutional)	2,300 SF	7 pounds per 1,000 SF per day	16
<i>Project-Generated Solid Waste</i>			660
Net Increase			220
Notes: ppd = pounds per day; SF = square feet			
Sources: California Department of Resources Recycling and Recovery, <i>Estimated Solid Waste Generation Rates</i> , https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates , accessed February 14, 2019.			

³ California Department of Resources Recycling and Recovery, *Estimated Solid Waste Generation Rates*, <https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>, accessed February 14, 2019.



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

Less Than Significant Impact. As stated above, AB 939, the Integrated Waste Management Act of 1989 (California Public Resources Code Sections 40000 et seq.), requires all local governments to develop source reduction, reuse, recycling, and composting programs to reduce tonnage of solid waste going to landfills. Cities must divert at least 50 percent of their solid waste generation into recycling. Compliance with AB 939 is measured for each jurisdiction, in part, as actual disposal amounts compared to target disposal amounts. Actual disposal amounts at or below target amounts comply with AB 939. Target solid waste disposal amounts for the City of Stanton are 6.7 ppd per resident and 35.1 ppd per employee. Actual disposal rates for Stanton in 2017, the latest year for which data are available, are 5.5 ppd per resident and 26.8 ppd per employee, which are below target rates.⁴

AB 1327, the California Solid Waste Reuse and Recycling Access Act of 1991 (California Public Resources Code Sections 42900 et seq.) required the California Integrated Waste Management Board to develop a model ordinance requiring adequate areas for the collection and loading of recyclable materials in development projects. Local agencies were then required to adopt and enforce either the model ordinance or an ordinance of their own by September 1, 1993. Per Municipal Code Section 6.01.100, *Construction and Demolition Materials Management Plans*, the project is required to prepare a construction and demolition materials management plan that details the estimated volume or weight of construction and demolition materials, the amount that would be diverted via reuse or recycling, and the vendor or facility that would collect or divert the materials, among other requirements.

Overall, the project would be required to comply with laws and regulations governing solid waste disposal, and impacts would be less than significant.

⁴ California Department of Resources Recycling and Recovery, *Per Capita Disposal Rates Trends, Stanton 2007-2017*, accessed February 14, 2019.



4.20 WILDFIRE

If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:

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

No Impact. According to the California Department of Forestry and Fire (CAL FIRE) *Orange County Very High Fire Hazard Severity Zones in SRA Map*, the City of Stanton is not located in or near a State responsibility area nor is the City classified as a very high fire hazard severity zone.²⁶ Therefore, no impact would occur in this regard.

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

No Impact. Refer to Response 4.20(a).

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

No Impact. Refer to Response 4.20(a).

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

No Impact. Refer to Response 4.20(a).

²⁶ California Department of Forestry and Fire Protection, *Orange County Fire Hazard Severity Zones in SRA*, November 7, 2007, http://frap.fire.ca.gov/webdata/maps/orange/fhszs_map.30.jpg, accessed January 24, 2019.



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4.21 MANDATORY FINDINGS OF SIGNIFICANCE

Would the project:

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

Potentially Significant Impact. As concluded in Section 4.4, *Biological Resources*, the project site is built out with the 28 existing fourplex apartment buildings, the Illuminations Foundation Children's Resource Center, a community garden, and several vacant lots. No sensitive plant and animal species occur on-site. Thus, the project would have no impacts on sensitive plant and animal species. However, Section 4.5, *Cultural Resources*, and Section 4.18, *Tribal Cultural Resources*, conclude that archaeological, paleontological and tribal cultural resources may be adversely impacted by project development. Therefore, further analysis will be conducted as part of the EIR.

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

Potentially Significant Impact. A significant impact may occur if a proposed project, in conjunction with related projects, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together. Further analysis will be conducted as part of the EIR to determine whether the project would have impacts that are individually limited, but cumulatively considerable.

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

Potentially Significant Impact. As concluded within this Initial Study, project implementation could result in potentially significant environmental impacts that may have adverse effects on human beings. Therefore, further analysis will be conducted as part of the EIR in this regard.



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NATIVE AMERICAN HERITAGE COMMISSION
Cultural and Environmental Department
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West Sacramento, CA 95691 Phone (916) 373-3710
Email: nahc@nahc.ca.gov
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APR - 8 2019

April 2, 2019

Kelly Hart
City of Stanton
7800 Katella Ave
Orange, CA 90680

COMMUNITY DEVELOPMENT

RE: SCH# 2019039134 Tina-Pacific Neighborhood Development Plan Project, Orange County

Dear Ms. Hart:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101; 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
 - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
 - a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
 - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
 - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subs. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email

address: Steven.Quinn@nahc.ca.gov.

Sincerely,



for

Steven Quinn

Associate Governmental Program Analyst

cc: State Clearinghouse



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA USPS AND E-MAIL:

April 16, 2019

khart@ci.stanton.ca.us

Kelly Hart, Director

City of Stanton, Community and Economic Development Department

7800 Katella Avenue

Stanton, CA 90680

Notice of Preparation of an Environmental Impact Report for the Proposed Tina-Pacific Neighborhood Development Plan Project

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. South Coast AQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Environmental Impact Report (EIR). Please send South Coast AQMD a copy of the EIR upon its completion. Note that copies of the EIR that are submitted to the State Clearinghouse are not forwarded to South Coast AQMD. Please forward a copy of the EIR directly to South Coast AQMD at the address shown in the letterhead. **In addition, please send with the EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files¹. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, South Coast AQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

South Coast AQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. South Coast AQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from South Coast AQMD's Subscription Services Department by calling (909) 396-3720. More guidance developed since this Handbook is also available on South Coast AQMD's website at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). South Coast AQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

South Coast AQMD has also developed both regional and localized significance thresholds. South Coast AQMD staff requests that the Lead Agency quantify criteria pollutant emissions and compare the results to South Coast AQMD's CEQA regional pollutant emissions significance thresholds to determine air

¹ Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

quality impacts. South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found here: http://www.aqmd.gov/docs/default-source/ceqa/handbook/South_Coast_AQMD-air-quality-significance-thresholds.pdf. In addition to analyzing regional air quality impacts, South Coast AQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by South Coast AQMD staff or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis.

In the event that the Proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Guidance² on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF.

Mitigation Measures

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are

² In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's Air Quality and Land Use Handbook: A Community Health Perspective. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: <https://www.arb.ca.gov/ch/landuse.htm>.

available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including:

- Chapter 11 “Mitigating the Impact of a Project” of South Coast AQMD’s *CEQA Air Quality Handbook*. South Coast AQMD’s CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>
- South Coast AQMD’s Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- South Coast AQMD’s Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf>
- CAPCOA’s *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Alternatives

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a “no project” alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

Permits and South Coast AQMD Rules

In the event that the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the EIR. The assumptions in the air quality analysis in the EIR will be the basis for permit conditions and limits. For more information on permits, please visit South Coast AQMD’s webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to South Coast AQMD’s Engineering and Permitting staff at (909) 396-3385.

School Facilities

Based on a review of the Project Description in the Notice of Preparation, South Coast AQMD staff found that the Proposed Project would include, among others, construction of a 2,300-square-foot preschool on 10.27 acres. South Coast AQMD staff recommends that the Lead Agency review California Public Resources Code Section 21151.8 and CEQA Guidelines Section 15186 to determine if the Proposed Project is subject to the consultation requirements and meet the appropriate CEQA requirements, if applicable. For a search of South Coast AQMD permitted facilities pursuant to California Public Resources Code Section 21151.8 and CEQA Guidelines Section 15186, please fill out the “Grid Search Request Form” that is available at: <http://www.aqmd.gov/docs/default-source/aqmd-forms/Permit/ab3205-request-form.pdf>.

Data Sources

South Coast AQMD rules and relevant air quality reports and data are available by calling South Coast AQMD’s Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available at South Coast AQMD’s webpage at: <http://www.aqmd.gov>.

South Coast AQMD staff is available to work with the Lead Agency to ensure that project air quality and health risk impacts are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov or (909) 396-3308.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

ORC190322-11

Control Number



ORANGE COUNTY FIRE AUTHORITY

P. O. Box 57115, Irvine, CA 92619-7115

1 Fire Authority Way, Irvine, CA 92602

Brian Fennessy, Fire Chief • www.ocfa.org • (714) 573-6000 / Fax (714) 368-8843

April 9, 2019

City of Stanton
Planning Division
Attn: Kelly Hart
7800 Katella Avenue
Stanton, CA 90680

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APR 17 2019

COMMUNITY DEVELOPMENT

Ref: Notice of Preparation of a Draft Environmental Impact Report Tina Pacific Neighborhood Development Plan

Dear Kelly Hart:

Thank you for the opportunity to review the subject document. The Orange County Fire Authority (OCFA) provides fire protection and emergency medical services response to the project area. Services include: structural fire protection, emergency medical and rescue services, education and hazardous material response. OCFA also participates in disaster planning as it relates to emergency operations, which includes high occupant areas and schools sites and may participate in community disaster drills planned by others. Resources are deployed based upon a regional service delivery system, assigning personnel and equipment to emergency incidents without regard to jurisdictional boundaries. The equipment used by the department has the versatility to respond to both urban and wildland emergency conditions. The following are our comments:

We believe that with the following measures this project should be less than significant impact:

- The project is subject to review by the City and the OCFA for various construction document plan checks for the applicable fire life safety codes and regulations. The project will be subject to the current editions of the CBC, CFC and related codes.
- Structures of this size and occupancy are required to have automatic fire sprinkler systems designed per NFPA 13 as required in the current CBC, CFC.
- A water supply system to supply fire hydrants and automatic fire sprinkler systems is required. Fire flow and hydrant spacing shall meet the minimums identified in the codes. Please refer to the California Fire Code Appendix section. These tables are also located in OCFA Guideline B09, Attachment 23.
- Fire apparatus and personnel access to and around structures shall meet the minimum development standards of the OCFA and California Fire Code requirements. Please reference Section 2 of the OCFA's Guideline B-09 at www.ocfa.org.

In addition, we would like to point out that all standard conditions with regard to development, including water supply, built in fire protection systems, road grades and width, access, building materials, and the like will be applied to this project at the time of

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RESIDENTIAL SPRINKLERS AND SMOKE DETECTORS SAVE LIVES

plan submittal. Thank you for providing us with this information. Please contact me at 714-573-6199 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Tamera Rivers", written in a cursive style.

Tamera Rivers

Management Analyst
Strategic Services Section
tamyrivers@ocfa.org
714-573-6199



RECEIVED
APR 22 2019

April 18, 2019

COMMUNITY DEVELOPMENT

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Ms. Kelly Hart
Community and Economic Development Director
City of Stanton
7800 Katella Avenue
Stanton, CA 90680

Subject: Tina-Pacific Neighborhood Development Plan Project Initial Study

Dear Ms. Hart:

Thank you for providing the Orange County Transportation Authority (OCTA) with the Initial Study for the Tina-Pacific Neighborhood Development Plan Project (Project). The following comments are provided for your consideration.

New residential land use construction provides an opportunity to encourage a variety of travel choices. We encourage the City to consider inclusion of short/long-term bicycle parking and bicycle facilities for residents and guests. Short-term parking in the ratio of one bicycle parking space for every four units might be considered, and inclusion of a secure ground floor indoor bicycle storage area may serve long-term bicycle parking.

Throughout the development of this project, we encourage communication with OCTA on any matters discussed herein. If you have any questions or comments, please contact me at (714) 560-5907 or at dphu@octa.net.

Sincerely,

Dan Phu
Manager, Environmental Programs

CHIEF EXECUTIVE OFFICE

Darrell E. Johnson
Chief Executive Officer

April 19, 2019



www.kennedycommission.org
17701 Cowan Ave., Suite 200
Irvine, CA 92614
949 250 0909

Ms. Kelly Hart, Community & Economic Development Director
City of Stanton
7800 Katella Ave.
Stanton, CA 90680

RE: Initial Study for the Tina-Pacific Neighborhood Development Plan Project

Dear Ms. Hart:

The Kennedy Commission (the Commission) is a coalition of residents and community organizations that advocates for the production of homes affordable for families earning less than \$20,000 annually in Orange County. Formed in 2001, the Commission has been successful in partnering with Orange County jurisdictions to create effective housing policies that have led to the construction of new homes affordable to lower income working families.

Thank you for the opportunity to review and comment on the Initial Study for the Tina-Pacific Neighborhood Development Plan Project. As the City moves forward with the initial planning process for the proposed project, the Commission recommends the City to consider the following:

1. Provide meaningful outreach to existing residents and stakeholders to discuss the project timeline and the potential impacts existing residents may experience from the proposed Tina-Pacific Neighborhood Development Plan Project.
2. Conduct a comprehensive analysis on the significant impacts the plan will have on existing residents. Will existing residents be displaced? How much and what type of relocation benefits will be provided by the City to existing residents if they are displaced by this project?
3. Provide an option for the right of first refusal to existing residents and residents who will be displaced by this project.
4. Ensure the proposed project will provide rents at a deeper affordability level for very low- and extremely low-income residents.

Ranked among the top ten least affordable metropolitan areas in the country¹, Orange County is suffering from an affordable housing crisis. A resident must earn at least \$36.08 per hour to afford a two-bedroom apartment at a fair market rent of \$1,876 a month.² Over the past seven years, Orange County renters have paid an average of \$355 more a month and rents are projected to continually rise.³ During 2000 to 2015, Orange County's inflation-adjusted median rent increased by 28 percent while the median renter income decreased by 9 percent.⁴

¹ Out of Reach 2018- The High Cost of Housing, National Low Income Housing Coalition, p.14, 2018.

² Out of Reach 2018- The High Cost of Housing, National Low Income Housing Coalition, p.38, 2018.

³ Southern Californians Scrimp to Get By As Average Rents Hit \$1,900, Orange County Register, February 15, 2018.

For the 2014-2021 Housing Element planning period, the City has a Regional Housing Needs Assessment (RHNA) of 68 very low- and 49 low-income households. To-date, the City has not built any very low-income or low-income units in the City; however, for the above moderate-income units, the City has constructed 96 units or 69% of the 140 above moderate-income RHNA. With a remaining RHNA need of 117 lower income homes, it is important the City support the development of affordable homes for lower income households in the City. In addition, in accordance with the General Plan Housing Element Residential Land Resources Appendix, properties in the High Density Residential (RH) zone, such as the parcels in the proposed project, may be developed at a net density of thirty dwelling units per acre or greater in order to meet lower income growth needs.⁵

The impact of this crisis is dire. Many Orange County renters are rent burdened where they spend more than 30% of their income towards housing costs. Struggling to make ends meet, many households take on more jobs or live in overcrowded substandard households. With high rents, low vacancy rates and an increasing number of residents needing affordable homes, the supply of affordable homes being built for lower income households has also not kept up with the demand. An additional 92,738 affordable rental homes are needed to address Orange County's housing needs for lower income renters.⁶

With high housing costs and significant lack of affordable homes, many workers and families, especially those who earn lower wages, struggle financially to live in the city they work in. These impacts not only hurt workers and families but may also impact the city's economic competitiveness and attractiveness to major employers to provide jobs. Locating homes, specifically affordable homes, near transit, job centers and neighborhood services will decrease travel costs and allow individuals to save money and spend it elsewhere in the City. In particular, the environmental impacts of a development are especially less drastic when a person can afford to live and spend their money in the same community in which they work in.

In 2016, the average commute time to work for Orange County residents was approximately 29 minutes and approximately 82% of commuters drove alone.⁷ Improving location accessibility and connectivity reduces the dependency for residents, especially for lower income households and workers, to drive their automobiles. This will lead to decreased environmental impacts, such as vehicles miles traveled (VMT) and greenhouse gas emissions, which will contribute to the project's overall purpose and intent to create a sustainable transit oriented neighborhood. The project will also align with the Sustainable Communities and Climate Protection Act of 2008 (SB 375) and help the City implement and comply with SB 375 goals of reducing VMT and greenhouse gas emissions.

⁴ California Rents Have Risen to Some of the Nation's Highest. Here's How that Impacts Residents, Orange County Register, February 15, 2018.

⁵ Initial Study Tina-Pacific Neighborhood Development Plan Project, City of Stanton, March 2019.

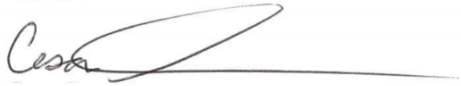
⁶ Orange County's Housing Emergency and Proposed Solutions, California Housing Partnership Corporation, p. 1, May 2018.

⁷ Profile of Orange County, Southern California Association of Governments, p. 18, May 2017.

Ms. Kelly Hart
April 19, 2019
Page 3 of 3

The Commission looks forward to partnering with the City to increase affordable home opportunities for lower income working households in the City. Please keep us informed of any updates and meetings regarding the Tina-Pacific Neighborhood Development Plan Project. If you have any questions, please contact me at (949) 250-0909 or cesarc@kennedycommission.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cesar', followed by a long horizontal line extending to the right.

Cesar Covarrubias
Executive Director

DEPARTMENT OF TRANSPORTATION

DISTRICT 12

1750 EAST FOURTH STREET, SUITE 100

SANTA ANA, CA 92705

PHONE (657) 328-6267

FAX (657) 328-6510

TTY 711

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April 22, 2019

Kelly Hart
City of Stanton
7800 Katella Ave.
Stanton, CA 90680

File: IGR/CEQA
SCH: # 2019039134
12-ORA-2019-01097
SR 39; PM 10.924
SR 22; PM 4.833

Dear Ms. Hart,

Thank you for including the California Department of Transportation (Caltrans) in the review of Notice of Preparation (NOP) and the Initial Study (IS) for the proposed Tina-Pacific Neighborhood Development Plan Project, located at the intersection of Magnolia Avenue and Pacific Avenue. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability.

The proposed project involves constructing a 161-unit multi-family affordable housing development. To do so, the City is proposing to acquire the 15 remaining properties on-site; relocate all existing tenants; demolish all structures and existing street improvements; and vacate the two public roadways (Tina Way and Pacific Avenue) and two alleyways on-site.

The site is located to the west of the intersection of Magnolia Avenue and Pacific Avenue. More specifically, the 10.27-acre project site is bounded by Tina Way to the north, Magnolia Avenue to the east, an alleyway south of Pacific Avenue to the south, and Sherrill Street to the west. The site encompasses 40 parcels as well as portions of two public streets (Tina Way and Pacific Avenue) and two alleyways. Regional access to the project site is provided via State Route 22 (SR-22) via the Beach Boulevard (SR 39) and Magnolia Avenue off-ramps.

The project site is .9 miles east of SR 39 and 2.7 north of SR 22, the Garden Grove freeway. Both SR 39 and SR 22 are owned and operated by Caltrans. Caltrans is a responsible agency and has the following comments:

Traffic Operations

1. The Initial Study states that "...regional access to the project site is provided via State Route 22 (SR-22) via the Beach Boulevard and Magnolia Avenue off-ramps." Regional access is also provided along I-5. Please include I-5 in your analysis and provide a traffic analysis report for review.

Project Management

At this time, there are several Caltrans projects in the area that the City should be aware of and take into consideration when creating a timeline for the Tina-Pacific Neighborhood Development Plan Project.

Route	PM	Location	Description	Begin CON (M500)	End CON (M600)
39	9.67-9.67	In Stanton, on SR 39 at Chapman Avenue	Modify signals, add safety lighting, "ladder" stripes on crosswalk, refresh pavement delineation and bringing ADA to standards.	May 2021	August 2022
39	9.87-10.50	In Orange County in Stanton from 0.1 mi to south of Bever Place to 0.1 mi north of Stanton Storm Channel	Rehabilitate drainage systems, alleviate flooding	November 2016	September 2022
39	11.46-12.9	On Beach Boulevard within the city limits of Anaheim	Benefit-Cost analysis to relinquish SR-39 segment within the City of Anaheim limits.	April 2025	August 2026
39	11.68-12.20	On Route 39, install new traffic signal, center median, wrought iron fence, modify crosswalk, and updating ADA to current standard	Install new traffic signal, center median, wrought iron fence, modify crosswalk, and updating ADA to current standard.	September 2016	March 2018 <i>Recently Completed</i>

Storm Water

Any runoff draining into Caltrans Right of Way must fully conform to the current discharge requirements of the Regional Water Quality Control Board (RWQCB) to avoid impacting water quality. Permittee shall fully conform to the requirements of the Caltrans Statewide National Pollutant Discharge Elimination System (NPDES) Storm Water Permit, Order No. 99-06-DWQ, NPDES No. CAS000003, adopted by the State Water Resources Control Board (SWRCB) on July 15, 1999, in addition to the BMPs specified in the Caltrans Storm Water Management Plan (SWMP). When applicable, the Permittee will also conform to the requirements of the General NPDES Permit for Construction Activities, Order No. 99-08-DWQ, NPDES No. CAS000002, and any subsequent General Permit in effect at the time of issuance of this Encroachment Permit. These permits regulate storm water and non-storm water discharges associated with year-round construction activities.

Transportation Planning

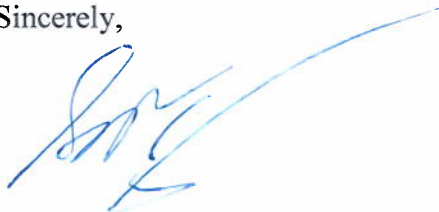
1. In the next stage, please consider discussing potential impacts and mitigation measures to bicycle facilities near the project site. Although there are no existing bicycle facilities directly adjacent to the site, there are still existing bicycle facilities located nearby.
2. Please discuss potential impacts and mitigation measures to pedestrian facilities on and near the project site. The document notes that the project may remove pedestrian facilities if it vacates Pacific Avenue, Tina Way, and two public alleyways.
3. Additionally, Walter Elementary School is located just south of the project site. Please consider discussing potential safety measures that the project may include for students attending this school.
4. Please submit a copy of the Traffic Impact Analysis to Caltrans upon completion for review. It is noted that there may be potentially significant transportation impacts for the project and the appropriate measures should be considered to mitigate these impacts.

Permits

In the event of any activity in the Caltrans's right-of-way, an encroachment permit will be required. For specific details on Encroachment Permits procedure, please refer to Encroachment Permits Manual. This Manual is available on the web site:
www.dot.ca.gov/hq/traffops/developserv/permits.

Please continue to coordinate with Caltrans for any future developments that could potentially impact State transportation facilities. If you have any questions, please do not hesitate to contact Julie Lugaro at 657-328-6368 or Julie.lugaro@dot.ca.gov.

Sincerely,



SCOTT SHELLEY
Branch Chief, Regional-IGR-Transit Planning
District 12

April 22, 2019

NCL-19-007

Kelly Hart, Community and Economic Development Director
City of Stanton
7800 Katella Avenue
Stanton, CA 90680

Subject: Notice of Preparation for the Tina-Pacific Neighborhood Development Plan Project Draft EIR

Dear Ms. Hart:

Thank you for the opportunity to comment on the Notice of Preparation for the Tina-Pacific Neighborhood Development Plan Project Draft EIR. The County of Orange offers the following comments for your consideration.

OC Infrastructure Programs /Flood Programs/Hydrology

1. The Project Area is tributary to the Orange County Flood Control District's (OCFCD) facilities. A map/exhibit should identify and indicate these regional flood control facilities that will likely be impacted by the proposed project. Drainage Facility Base maps that depict existing local and regional drainage facilities owned by the Orange County Flood Control District (OCFCD) are available for review at <http://www.ocflood.com/docs/drawings>.
2. The proposed project runoff drains to the local drainage system and flows toward the Dale-Cerritos Storm Drain (OCFCD Facility No. C02P08) and ultimately drains into the Stanton Storm Drain (OCFCD Facility No. C02S01). Please be advised that the mentioned channels contain deficient segments and are not capable of conveying runoff from a 100-year storm event. The potential development sites should not worsen existing conditions or shift flooding problems upstream or downstream of the proposed development.
3. The hydrology and hydraulic impacts resulting from the project must be assessed. These analyses of possible impacts to OCFCD's existing facilities and appropriate mitigation measures should be conducted in consultation with OC Public Works/OC Infrastructure Programs. The analyses must be consistent with the prevailing criteria of the Orange County Hydrology Manual (OCHM), Addendum No. 1 to the OCHM, the Orange County Flood Control Design Manual, the Orange County Local Drainage Manual, and other related design criteria.
4. Since the City of Stanton is responsible for land use planning and development within City limits, the City should review and approve all local hydrology and hydraulic analyses including the needed 100-year flood protection for the proposed development. Appropriate mitigation measures should be provided to address adverse impacts, and minimize increased runoff resulting from the project.
5. The City of Stanton, as floodplain administrator, should ensure that floodplains are properly identified and that structures are located outside the FEMA 100-year floodplain, or designed in conformance with local floodplain ordinances, and Federal Emergency Management Agency (FEMA) regulations.

6. All work within or adjacent to any OCFCD right-of-way or flood control facilities shall be conducted so as not to adversely impact structural integrity, hydraulic flow conditions, access and maintainability. Furthermore, all proposed projects within OCFCD's right-of-way should be reviewed and approved by OC Public Works, and the work should be conducted only after an encroachment permit has been obtained. For information regarding the permit application process and other details please refer to the Encroachment Permits Section link on OC Public Works' website at: http://www.ocpublicworks.com/ds/permits/encroachment_permits. Technical reviews and approvals for the proposed work will be accomplished within the permit process.

If you have any questions regarding these comments, please contact Sahar Parsi at (714) 647-3988 or Penny Lew at (714) 647-3990 in OC Infrastructure Programs or Cindy Salazar at (714) 667-8870 in OC Development Services.

Sincerely,



Richard Vuong, Manager, Planning Division
OC Public Works Service Area/OC Development Services
300 North Flower Street
Santa Ana, California 92702-4048
Richard.Vuong@ocpw.ocgov.com

cc: Sahar Parsi, OC Flood Programs/Hydrology & Floodplain Management
Penny Lew, OC Flood Programs/Hydrology & Floodplain Management