FIRSTCARBONSOLUTIONS™

DRAFT
West Broadway Townhome Project
Initial Study/Mitigated Negative Declaration
City of Anaheim, Orange County, California

Prepared for:
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Report Date: April 29, 2022

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List of Tables

List of Exhibits

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ACRONYMS AND ABBREVIATIONS

µg/m^3	micrograms per cubic meter
AB	Assembly Bill
ACM	asbestos-containing material
ADA	Americans with Disabilities Act
ADT	Average Daily Traffic
AFY	acre-feet per year
AHERA	Asbestos Hazard Emergency Response Act
APN	Assessor's Parcel Number
APU	Anaheim Public Utilities
ARB	California Air Resources Board
AQMD	Air Quality Management District
BAU	business-as-usual
BERD	Built Environment Resource Directory
BGS	below ground surface
BMP	Best Management Practice
BPP	Basin Production Percentage
C-G	Commercial-General
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
CAL/OSHA	California Division of Occupational Safety and Health
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CBC	California Building Standards Code
CDC	Centers for Disease Control and Prevention
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
cfs	cubic feet per second
CH_4	methane
CMP	Congestion Management Plan
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPSEI	California Native Plant Society Electronic Inventory
CO	carbon monoxide

CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CPHI	California Points of Historical Interest
CPS	Connector Pipe Screen
CRHR	California Register of Historical Resources
CUP	Conditional Use Permit
CWA	Clean Water Act
DAMP	Drainage Area Management Plan
dB	decibels
dBA	A-weighted decibels
DCV	Design Capture Volume
DOC	California Department of Conservation
DPM	diesel particulate matter
DPR	California Department of Parks and Recreation
DTSC	California Department of Toxic Substances
du/acre	dwelling unit per acre
EIR	Environmental Impact Report
ESA	Environmental Site Assessment
EOP	Emergency Operations Plan
EPA	United States Environmental Protection Agency
EV	electric vehicle
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
GHG	greenhouse gas
GP	General Plan
GPA	General Plan Amendment
GPCD	gallons per capita per day
GPD	gallons per day
GPD/du	gallons per day per dwelling unit
GPPP	General Plan Plus Project
HCM	Highway Capacity Manual
HFC	hydrofluorocarbons
HOA	Homeowner's Association
HRA	Health Risk Assessment
ICU	Intersection Capacity Utilization

IPaC	Information for Planning and Consultation
IS/MND	Initial Study/Mitigated Negative Declaration
ITE	Institute of Transportation Engineers
kBTU	kilo-British Therman Unit
KSF	thousand square feet
kW	kilowatt
kWh	kilowatt-hour
LBP	lead-based paint
lbs	pounds
L_{eq}	equivalent sound level
LID	Low Impact Development
LOS	Level of Service
LRA	Local Responsibility Area
LST	localized significance threshold
MBTA	Migratory Bird Treaty Act
Metropolitan	Metropolitan Water District of Southern California
MGD	million gallons per day
MLD	Most Likely Descendant
MM	Mitigation Measure
mph	miles per hour
MRZ	Mineral Resource Zone
MS4	Municipal Separate Storm Sewer System
MT	metric tons
MWS	Modular Wetland System
N_2O	nitrous oxide
NAHC	Native American Heritage Commission
NIMS	National Incident Management System
NO_X	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
NRHP	National Register of Historic Places
OC Basin	Orange County Groundwater Basin
OCFCD	Orange County Flood Control District
OCP	organochlorine pesticide
OC San	Orange County Sanitation District
OCTA	Orange County Transportation Authority
OCWD	Orange County Water District
OSHA	Occupational Safety and Health Administration
OY	Opening Year

OYPP	Opening Year Plus Project
PDF	Project Design Feature
PFC	perfluorocarbon
PM	particulate matter
PM_{10}	particulate matter with aerodynamic diameter less than 10 microns
$PM_{2.5}$	particulate matter with aerodynamic diameter less than 2.5 microns
ppm	parts per million
PPV	peak particle velocity
PV	photovoltaic
RCNM	Roadway Construction Noise Model
REC	Recognized Environmental Condition
RHNA	Regional Housing Needs Assessment
RM-1	Multiple-Family Residential (3,350 square feet minimum lot area)
RM-2	Multiple-Family Residential (3,000 square feet minimum lot area)
RM-3	Multiple-Family Residential (2,400 square feet minimum lot area)
RM-3.5	Multiple-Family Residential (1,600 square feet minimum lot area)
RM-4	Multiple-Family Residential (1,200 square feet minimum lot area)
RSL	Regional Screening Level
RTP	Regional Transportation Plan
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCS	Sustainable Communities Survey
SF_6	sulfur hexafluoride
SLF	Sacred Land File
SoCAB	South Coast Air Basin
SO_X	sulfur oxides
SP	service population
SRA	State Responsibility Area
SRRE	Source Reduction and Recycling Element
STC	Sound Transmission Class
SUBTM	Subdivision Tentative Tract Map
SWIS	Solid Waste Information System
SWPPP	Storm Water Pollution Prevention Plan
TAC	toxic air contaminant
TCR	Tribal Cultural Resources
TIA	Traffic Impact Analysis

TPA	Transit Priority Area
USFWS	United States Fish and Wildlife Service
UWMP	Urban Water Management Plan
V/C	volume to capacity
VHFSZ	Very High Fire Severity Zone
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOC	volatile organic compounds
WAWPSS	West Anaheim Water Plan of Sanitary Sewers
WQMP	Water Quality Management Plan
YMCA	Young Men's Christian Association
ZEV	Zero-Emission Vehicles

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SECTION 1: INTRODUCTION

1.1 - Purpose

The purpose of this Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) is to identify any potential environmental impacts that would result from implementation of the West Broadway Townhomes Project (proposed project) in the City of Anaheim (City), in Orange County, California. Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15367, the City has discretionary authority over the proposed project and is the Lead Agency in the preparation of this Draft IS/MND and any additional environmental documentation required for the proposed project. The intended use of this document is to analyze the proposed project pursuant to the requirements of CEQA and to provide the basis for input from public agencies, organizations, and interested members of the public.

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

1.2 - Project Location

The project site is located at 1661 to 1673 West Broadway, in the City of Anaheim, in Orange County, California (Exhibit 1). The approximately 1.55-acre project site consists of two parcels, Assessor's Parcel Number (APN) 250-101-08 and 250-101-09. The project site is immediately north of Broadway, an east–west oriented roadway, and is approximately 0.56 mile west of Interstate 5 (I-5), the Santa Ana Freeway. As shown in Exhibit 2, the project site is in the western/central portion of the City. Regional access to the project site is from I-5 via Broadway, Lincoln Avenue, and Euclid Street exits.

1.3 - Environmental Setting

Land Uses and Zoning

The proposed project would demolish the existing buildings and improvements on the project site, which consist of three single-story multi-tenant office buildings and a shared asphalt parking lot. The tenants of the office buildings include various medical and dental offices, dental labs, a former pharmacy, an acupuncture practice, and a massage establishment. The project site also includes an illegal cannabis dispensary that has been reported to City of Anaheim Community Preservation Division for appropriate code enforcement action. From at least the 1930s until the early 1960s, the project site was an orchard. By 1963, the development on the project site consisted of one rectangular structure on the western portion of the project site. By 1972, the project site had been developed with all three existing structures and an asphalt parking lot.

The General Plan currently designates the project site for Office–Low land use (Exhibit 3).[1] The proposed project would require a General Plan Amendment (GPA) to modify the land use designation from Office–Low to Mid Density Residential. The Mid Density Residential land use designation provides for a wide range of residential uses, including detached, small-lot single-family homes, attached single-family homes, patio homes, zero lot line homes, duplexes, and townhouses. The Multiple-Family Residential Zones (RM-1, RM-2, RM-3, and RM-3.5) are the typical implementing zones for this land use designation. The permitted density range is from zero up to 27 dwelling units per gross acre (du/acre); the maximum density of the Mid Density Residential designation is 27.0 du/acre.[2]

The project site is within the "C-G" General Commercial Zone (Exhibit 4). The proposed project would require a zone change from the C-G Zone to the RM-3.5 Zone. The intent of the RM-3.5 Zone is to provide an attractive, safe, and healthy environment consisting of multiple-family units with a minimum building site area per dwelling unit of 1,600 square feet. This zone implements the Mid Density Residential and the Medium Density Residential land use designations in the General Plan. Buildings in the RM-3.5 Zone are limited to 40 feet in height. The proposed project would require a Conditional Use Permit (CUP) to permit 34 single-family attached dwellings in the Residential Planned Unit Development with modified setbacks between buildings, interior landscape setbacks, and street setbacks.

Surrounding Land Uses

North Residential 2-story apartment buildings in the "RM-4" Multiple-Family Residential zone.

South Residential 1-story, 2-story and 3-story apartment buildings and condominiums in the RM-4 Zone across Broadway.

East Residential 2-story apartments in the RM-4 Zone, Passion Bread of Life Christian Church in the Transitional (T) Zone.

West A strip mall with retail stores, hair salon, and laundromat; Shalom Mission Baptist Church; and the Anaheim Family Young Men's Christian Association (YMCA) in the C-G Zone.

1.4 - Project Description

The applicant, City Ventures Homebuilding, LLC, is proposing to develop 34 attached townhomes on an approximately 1.55-acre project site (Exhibit 5). The proposed project would include demolition of the three existing buildings and the parking lot on-site and the construction of five residential buildings, roadways, sidewalks, and associated improvements on the project site. Each building would include either six townhomes or eight townhomes. The proposed project would include the following floor plan variations:

- Six 1,062-square-foot, 2-bedroom, 2.5-bathroom townhomes (Plan 1).
- Four 1,342-square-foot, 2-bedroom, 2.5-bathroom townhomes with a loft (Plan 2a).

[1] City of Anaheim. 2004. City of Anaheim General Plan, Land Use Element. Figure LU-4, Land Use Plan. Revised March 9, 2021. Website: http://www.anaheim.net/DocumentCenter/View/9522. Accessed July 29, 2021.
[2] Ibid.

- Four 1,342-square-foot, 3-bedroom, 2.5-bathroom townhomes (Plan 2b).
- Ten 1,317-square-foot, 3-bedroom, 3-bathroom townhomes (Plan 3).
- Ten 1,633-square-foot, 4-bedroom, 4-bathroom townhomes with an optional den (Plan 4).

The proposed project would provide private roadways and parking, pedestrian walkways, common space, and landscaping. In the RM-3.5 Zone, required street setback for ground-floor patios is 12 feet; required interior structural setbacks are 20 feet for primary elevations of a 3-story building, and 5 feet for interior landscape setbacks. The required building-to-building setback between 3-story primary elevations is 40 feet. The proposed project's setbacks would be 10 feet for the ground-floor patios street setback, 15 feet for interior structural setbacks, 1-foot 4-inches for interior landscape setbacks, and 20 feet and 6 inches for setbacks between buildings. Density on the project site would be 21.93 dwelling units per acre, which would not exceed the maximum density of the proposed Mid Density Residential land use designation of 27 dwelling units per acre. The proposed project would provide a covered and gated trash enclosure on the west side of the project site.

The project applicant would request a GPA from Office-Low to Mid Density Residential, Zoning Reclassification from C-G to RM-3.5, Tentative Tract Map to create a 1-lot subdivision for condominium purposes, a CUP to modify setback standards, and a development agreement to provide a voluntary contribution to the City's affordable housing programs.

Parking and Circulation

Vehicles would access the project site via one main driveway entry from Broadway, located at the southwest corner of the project site. An internal private roadway system would provide two-way access to the surface parking lots and to the attached parking garages. The new roadway system would include a Fire Department turnaround per Anaheim Fire & Rescue standards. The proposed project would have 100 on-site parking spaces, consisting of 32 open parking spaces on the west side of the project site and 68 garage spaces, resulting in 2.94 spaces per home. The proposed parking spaces would meet the Code requirement of 100 spaces as shown in the tables below. Parking would include two accessible parking spaces. One parking space would be electric vehicle (EV) ready. Pedestrians would circulate within the proposed project via internal pedestrian walkways and sidewalks located throughout the site. Table 1 shows the required parking for the proposed project, and Table 2 shows the parking that would be provided as part of the proposed project.

Table 1: Required Parking

Unit Type	Unit Count	Required parking per unit	Required Spaces
2-bedroom	10	2.25	22.5
3-bedroom	14	3.0	42
4-bedroom	10	3.5	35
TOTAL	**34**	**2.94**	**100**

Table 2: Parking Provided

Parking Space Type	Spaces Provided
Garage	68
Head-In	30
Americans with Disabilities Act (ADA)-compliant	2
TOTAL	**100**

Open Space and Landscaping

The proposed project would provide 9,480 square feet of recreation-leisure area, which exceeds the Code requirement to provide 9,350 square feet. Recreation-leisure area would include 7,499 square feet of common areas and 1,981 square feet of private open space. The private open space would include 1,281 square feet of ground-level patios and 700 square feet of second-floor deck areas.

The proposed project would provide amenities that include interior community gathering areas with decorative paving and large trees. The total landscaped area, including landscape setbacks and deck areas, would be 11,782 square feet and would consist of street shade trees, screening trees, parking lot shade trees, landscape hedging around trash enclosures, décor pottery, patios, and common areas. Tree species to be planted would include species with low to medium irrigation needs, such as little gem magnolia (*Magnolia grandiflora "Little Gem")*, western sycamore (*Platanus racemose*), jacaranda (*Jacaranda mimosifolia*), southern live oak (*Quercus virginiana*), marina strawberry tree (*Arbutus unedo "Marina"*), and Hercules aloe (*Aloe "Hercules*"). Shrubs and groundcover would include species with very low to medium irrigation needs, such as desert spoon (*Dasylirion wheeleri*), brake lights red yucca (*Hesperaloe parviflora "Brake Lights"*), agave (*Agave spp.*), French lavender (*Lavandula dentata*), green cloud Texas sage (*Leucophyllum f. "Green Cloud"*), and star jasmine (*Trachelospermum jasminoides*) (Exhibit 6). Approval of the proposed project would include a condition of approval requiring a Homeowner's Association (HOA) to own and maintain all common area landscaping within the project site.

Building Design

The proposed project would include five plans. All homes would be three stories tall, or 38 to 40 feet in height, and would include attached 2-car side-by-side or tandem garages on the ground-level floor. The living spaces of the townhomes would be located on the second and third floors, and Plan 4 would include a bedroom on the first floor. Each townhome would have private patios or decks. The front exterior building material would consist of cement siding or fiber cement siding and stucco finish, with horizontal metal railings for the decks, vinyl window and door trim, and a decorative front entry door, as shown in Exhibit 7a and Exhibit 7b.

Infrastructure and Utilities

The proposed project would connect to existing water and sanitary lines on Broadway and would install stormwater drainage systems on-site. A transformer would be to be located in proximity to

the main driveway entry along Broadway. The proposed project would connect to existing water and sanitary lines on Broadway and would include the installation of stormwater management systems on-site. The entire site would be all electric and solar, therefore, there would be no gas usage on-site.

Construction

The applicant anticipates that construction the proposed project would begin September/October 2022 and the duration of construction would last between 18 to 24 months. Construction activities would include demolition of the existing paved surfaces and structures, site preparation, grading, building construction, architectural coatings, and paving. Construction of the proposed project would require 400 cubic yards of imported soil/fill material.

1.5 - Required Discretionary Approvals

As mentioned previously, the City of Anaheim has discretionary authority over the proposed project and is the CEQA Lead Agency for the preparation of this Draft IS/MND. In order to implement the project, the City would need to secure the following permits/approvals:

- Development agreement to permit a voluntary financial contribution to support the City's affordable housing programs
- General Plan Amendment for a land use designation change from Office – Low to Mid Density Residential.
- Zoning Map Amendment (Reclassification) from the C-G Zone to the RM-3.5 Zone.
- Tentative Tract Map (SUBTM) to create a 1-lot subdivision for condominium purposes.
- CUP to permit 34 Single-Family Attached Dwellings in the Residential Planned Unit Development with modified standards, including:
  - Setback between buildings, where 40 feet would be required, and 20 feet 6 inches would be provided.
  - Interior structural setbacks, where 20 feet would be required, and 15 feet would be provided.
  - Interior landscape setbacks, where 5 feet would be required, and 1-foot 4-inches would be provided.
  - Street setback for ground-floor patios, where 12 feet would be required, and 10 feet would be provided.

1.6 - Intended Uses of this Document

This Draft IS/MND has been prepared to determine the appropriate scope and level of detail required in completing the environmental analysis for the proposed project. This document will also serve as a basis for soliciting comments and input from members of the public and public agencies regarding the proposed project.

CEQA Guidelines Section 15073(d) states, "Where one or more state agencies will be a responsible agency or a trustee agency or will exercise jurisdiction by law over natural resources affected by the

project, or where the project is of Statewide, regional, or areawide environmental significance, the Lead Agency shall send copies of the proposed negative declaration or mitigated negative declaration to the State Clearinghouse for distribution to state agencies." Because the proposed project is not of Statewide, regional, or areawide environmental significance and there are no responsible or trustee agencies involved, the City will circulate the Draft IS/MND for a minimum of 20-day public review period. The public may provide comments concerning the analysis contained in the Draft IS/MND to:

Andy Uk, Associate Planner
City of Anaheim
200 South Anaheim Boulevard
Anaheim, CA 92805
Email: Auk@Anaheim.net

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

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5 2.5 0 5 Miles

Exhibit 1
Regional Location Map

00550087 • 10/2021 | 1_regional.mxd

CITY OF ANAHEIM
WEST BROADWAY TOWNHOME PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

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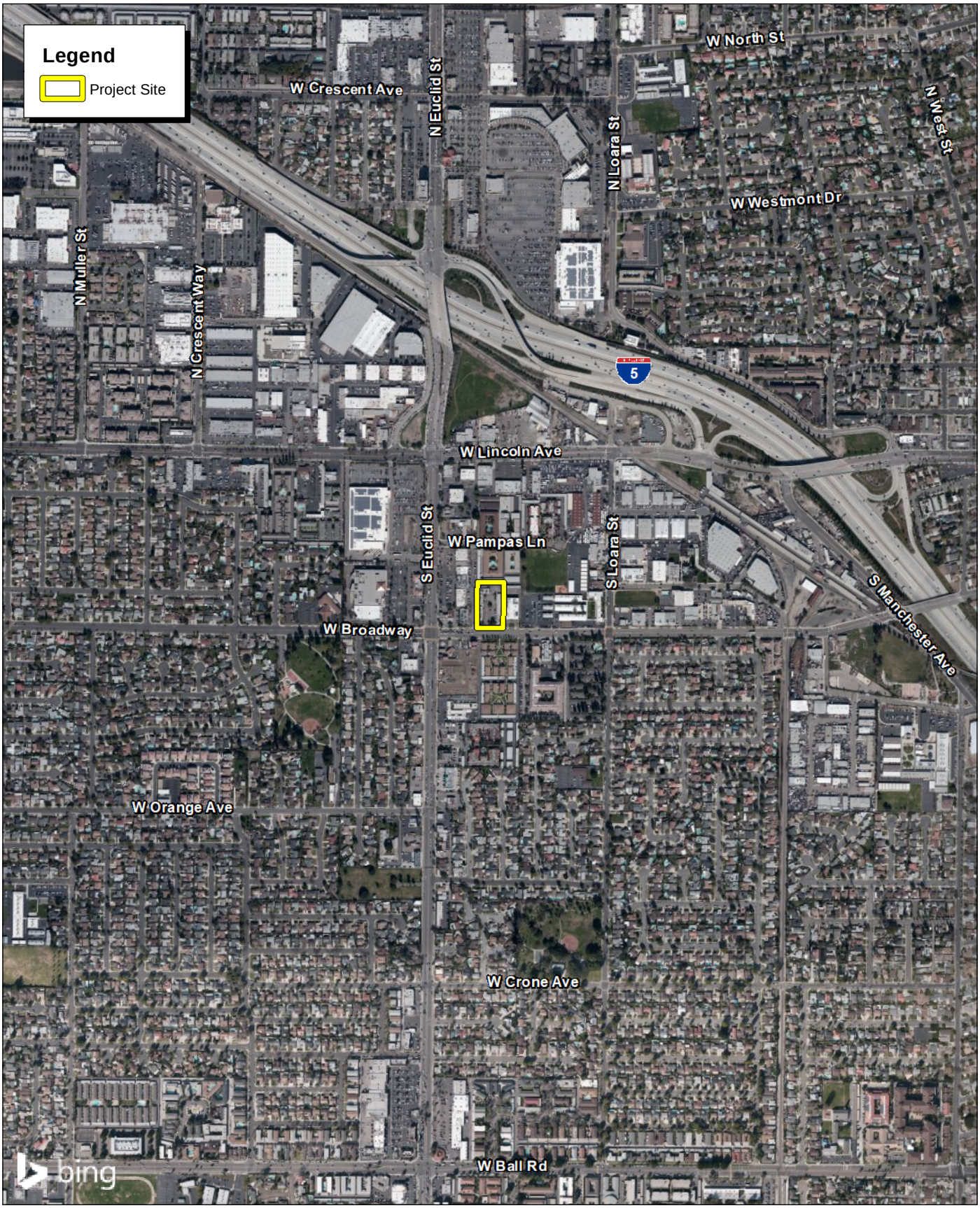

Source: Bing Aerial Imagery.

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1,000 500 0 1,000 Feet

Exhibit 2
Local Vicinity Map

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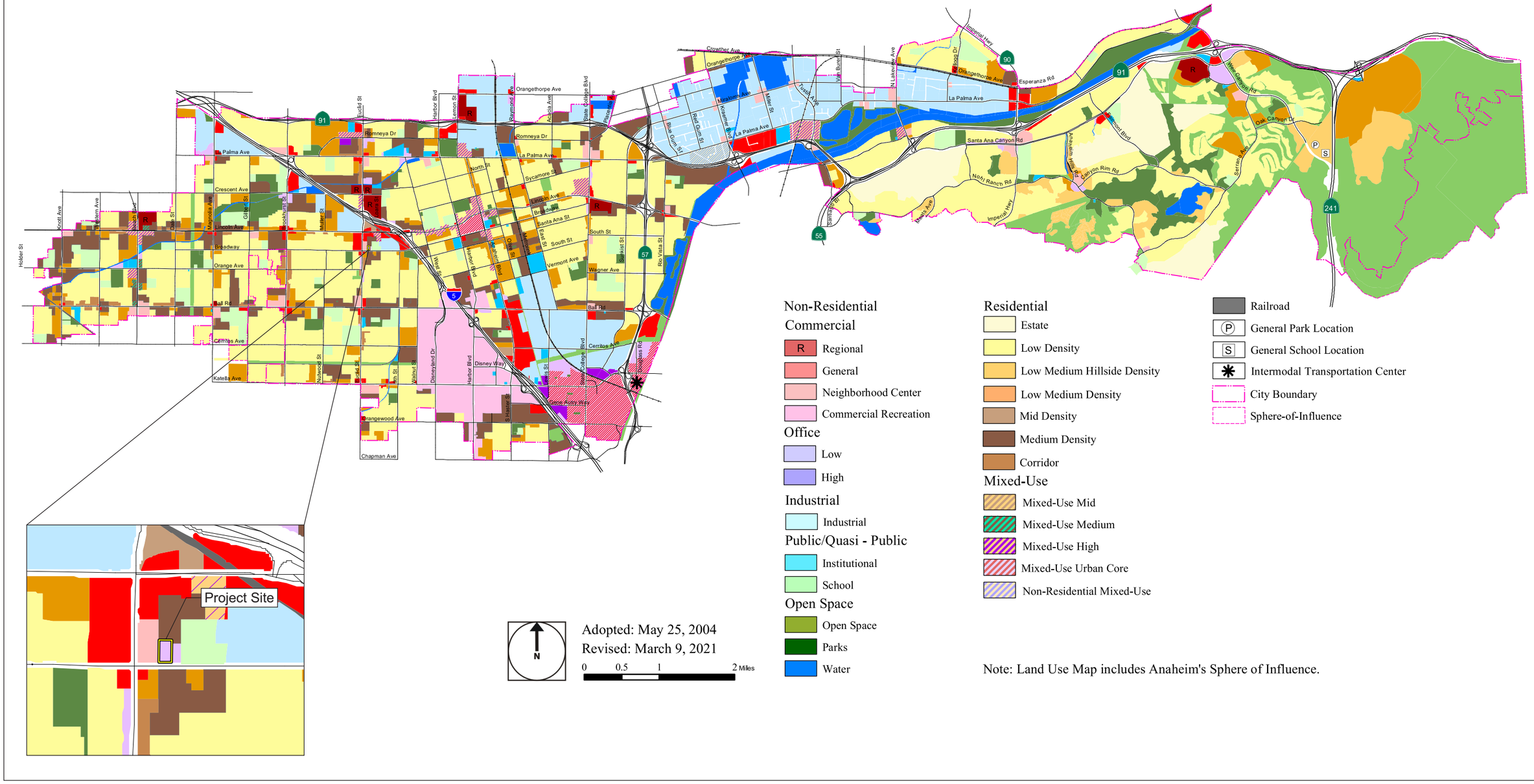

Source: City of Anaheim General Plan, Adopted May 25, 2004; Revised March 9, 2021.

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Exhibit 3
General Plan Land Use Map

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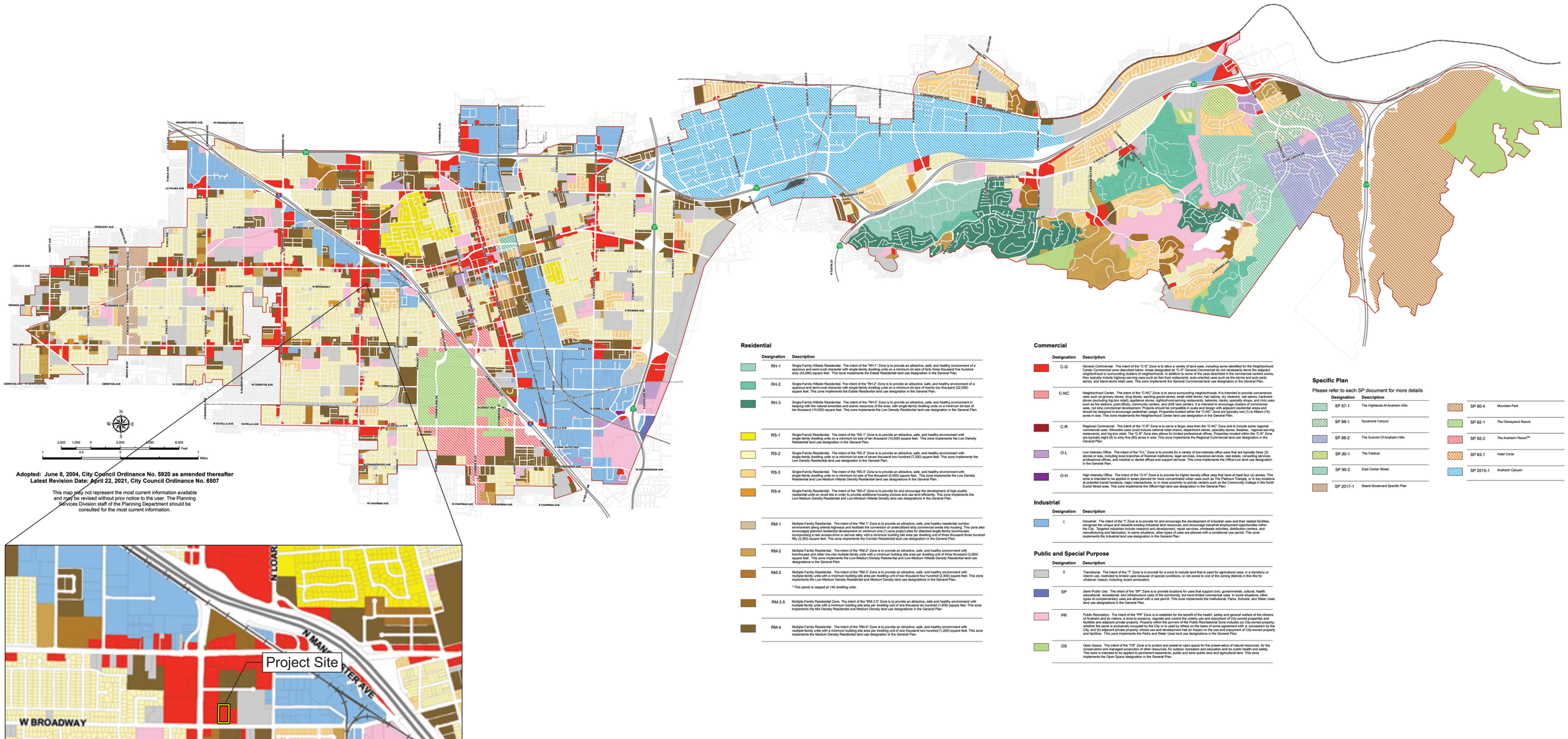

Source: City of Anaheim Zoning, Adopted June 8, 2004; Revised April 22, 2021.

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Exhibit 4
Zoning Map

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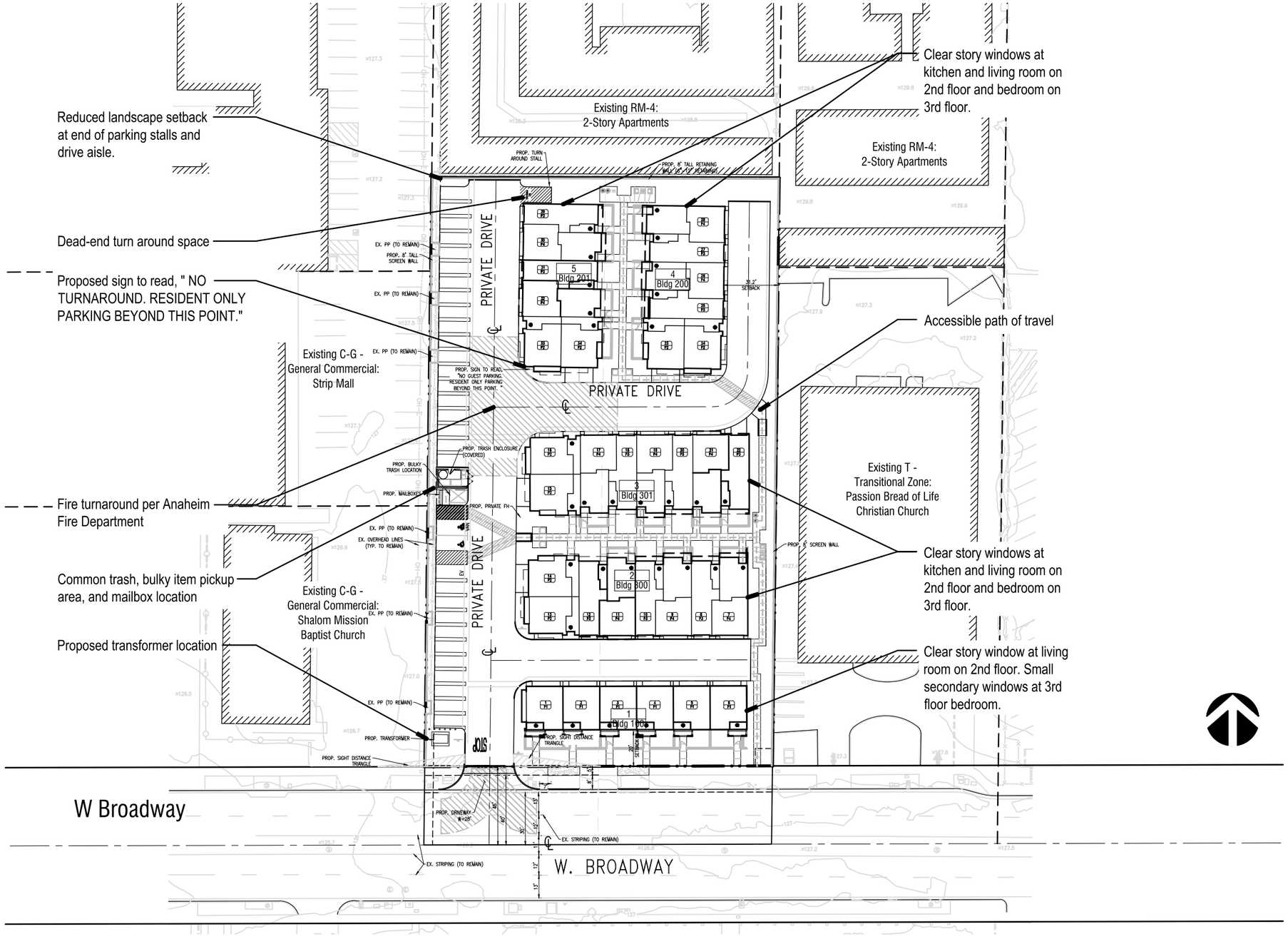

Source: WHA Architects, Planners, Designers, 03/22/2022.

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Exhibit 5
Site Plan

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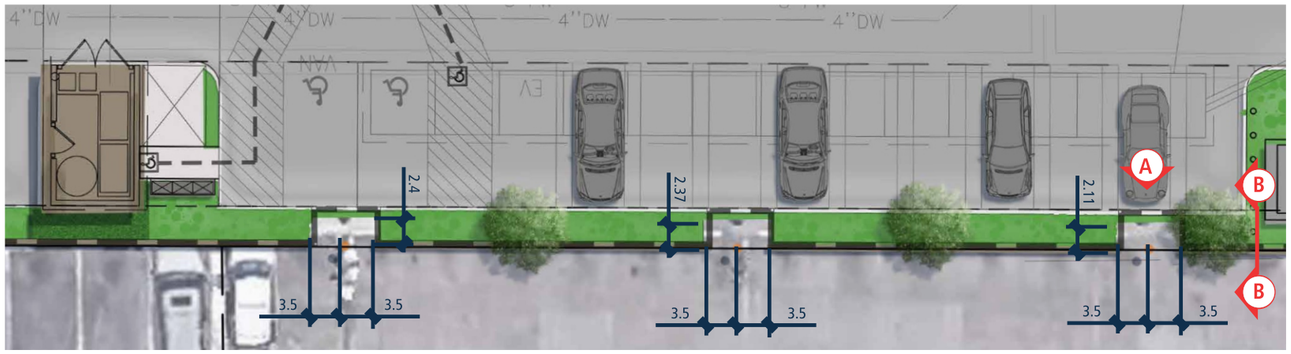
LEGEND

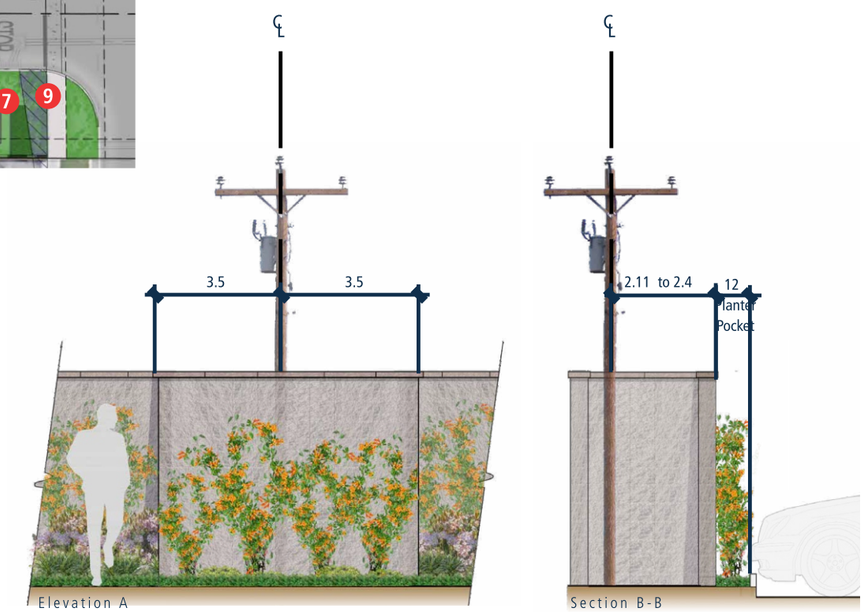
1. Street Trees at 20 o.c. maximum
2. Decor Pottery at Internal Paseo Entry
3. Low Patio Fence/Gate
4. Social Gathering Area with Accent Paving and Specimen Tree
5. Pedestrian Connection
6. Screening Tree
7. Landscape Hedge around the Transformer/Trash Enclosure
8. Parking lot shade trees
9. Sight Triangle
10. Power Pole Fence

Accessible Route/Path of Travel

*Total square footage of proposed landscape area: 11,782 sf.



POWER POLE AREA PLAN (N.T.S.)



LANDSCAPE TREATEMENT (N.T.S)

Source: C2|Collaborative, Landscape Architecture, 03/17/2022.

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Exhibit 6
Landscape Plan

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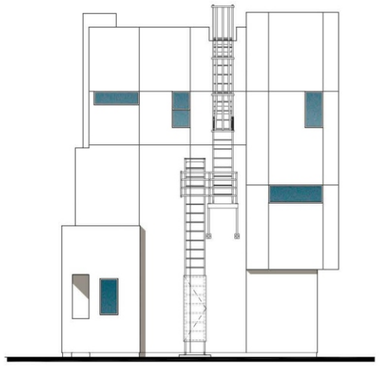

Right

Rear

Left

Refer to Landscape Drawings for wall, tree, and shrub locations

Note: Artist's conception, colors, materials and application may vary.

Front

buiLDiNG MAteriAL

Roof:	Flat with Parapet
Exterior:	Stucco Finish, Fiber Cement Siding
Deck Accents:	Horizontal Metal Railing
Window & Door Trim:	Vinyl
Entry Door:	Decorative Front Entry Door
Garage Door:	Sectional Garage Doors

0 4 8 16

Source: WHA Architects, Planners, Designers, 06/21/2021.

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Exhibit 7a
Conceptual Elevations

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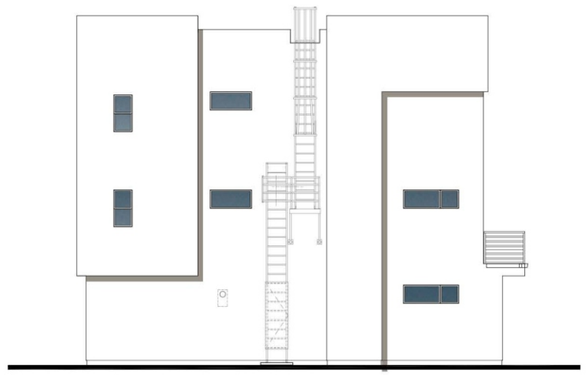
Right

Rear



Left

Refer to Landscape Drawings for wall, tree, and shrub locations

Note: Artist's conception, colors, materials and application may vary.

Front

buiLDiNG MAteriAL

Roof:	Flat with Parapet
Exterior:	Stucco Finish, Fiber Cement Siding
Deck Accents:	Horizontal Metal Railing
Window & Door Trim:	Vinyl
Entry Door:	Decorative Front Entry Door
Garage Door:	Sectional Garage Doors

Source: WHA Architects, Planners, Designers, 06/21/2021.

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Exhibit 7b
Conceptual Elevations

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SECTION 2: ENVIRONMENTAL CHECKLIST AND ENVIRONMENTAL EVALUATION

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

Environmental Determination

On the basis of this initial evaluation:

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

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

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

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

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

Date: May 4, 2022 Signed: _____

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

Environmental Evaluation

Setting

The City's General Plan discusses the City's ridgelines, views, and vistas in the Green Element. Although most of the western, northern, and southern areas of the City are built out, the Hill and Canyon area in the eastern portion of the City contains a significant amount of open space and borders on major open space resources, including the Chino Hills State Park, the Cleveland National Forest, and the Santa Ana River. Scenic highways are discussed in the Circulation Element of the General Plan. The intent of the California Scenic Highway program is to enhance the State's natural beauty and protect California's economic and social resources. Scenic Highways are transportation corridors where visual intrusions would impact views of natural beauty from the highway. State highways nominated for scenic designation must be included on the list of highways eligible for scenic designation in the State Scenic Highway System. Scenic highways are typically located within an unspoiled native habitat that showcases the unique aspects of the landscape.

Would the project:

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

Less than significant impact. Views and vistas of the natural contours of the Hill and Canyon area and the Santa Ana Mountains ridgeline are considered the primary aesthetic resource in the City. Other visual resources such as golf courses and the Santa Ana River also provide visual relief from the urban environment. The project site is approximately 11 miles west of the Hill and Canyon area

and approximately 10.5 miles northwest of the Santa Ana Mountains. The closest golf course to the project site is the Dad Miller Golf Course, approximately 1.4 miles west. Additionally, the Santa Ana River is approximately 4 miles east of the project site. The project site is characterized as flat and fully developed and is surrounded by mature trees and residential and commercial uses. Therefore, there are no scenic views available at the project site of any of the aesthetic resources identified in the General Plan. Partial views of the Santa Ana Mountains are available from the East Broadway right-of-way; however, those views would not be affected by the proposed project. Therefore, the proposed project would not significantly affect public viewpoints of scenic vistas, there would be no impact, and no mitigation is required.

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

Less than significant impact. Within the City, State Route (SR) 91, between SR-55 and Weir Canyon Road is officially designated as a Scenic Highway. The portion of SR-91 east of Weir Canyon is designated as an eligible Scenic Highway. However, neither of these scenic highways are within the project vicinity according to the General Plan Circulation Element Figure C-3, Scenic Highways.[3] The project site is located approximately 6.2 miles west of the SR-91 and approximately 7.2 miles west of the eligible Scenic Highway, the portion of SR-91 east of Weir Canyon. Additionally, there are no scenic resources located on the project site. Therefore, the proposed project would not damage scenic resources within a State Scenic Highway, there would be no impact and no mitigation is required.

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 proposed project is within a built-up, urbanized area. Presently, the project site is developed with three single-story multi-tenant office buildings with a shared asphalt parking lot and is zoned C-G. The proposed project consists of the development of 34 attached townhomes on the approximately 1.55-acre project site and would include a zone change from C-G to RM-3.5 Zone. This zone change would allow for multiple-family units with a minimum building site area per dwelling of 1,600 square feet. The development of the proposed project would result in a building site area per dwelling of approximately 1,985 square feet with is consistent with the zoning requirement for RM-3.5 Zone. The proposed project building heights would be 38 to 40 feet consistent with the RM-3.5 Zone building height limit of 40 feet.[4] The area surrounding the site does not otherwise contain any regulations governing scenic quality. Therefore, impacts would be less than significant, and no mitigation is required.

[3] City of Anaheim. 2004. Circulation Element. May. Website: https://www.anaheim.net/DocumentCenter/View/9520/D-0-Circulation-Element?bidId=. Accessed February 25, 2022.

[4] City of Anaheim. 2022. Anaheim Municipal Code. February. Website: https://codelibrary.amlegal.com/codes/anaheim/latest/anaheim_ca/0-0-0-65724. Accessed: February 25, 2022

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

Less than significant impact. The proposed project would develop 34 attached townhomes on an approximately 1.55-acre project site where the existing improvements, three single-story multi-tenant office buildings and a shared asphalt parking lot, would be demolished. The existing site includes exterior lighting on the existing buildings, but it does not include overhead lighting in the parking lot. Because the project site is previously developed, the increase in light and glare would not be substantially greater than the existing lighting at the project site. Additionally, the proposed project would comply with the City's Building Standards Code and would be designed to ensure that exterior lighting would have zero direct-beam illumination that would leave the project site. Therefore, impacts would be less than significant, and no mitigation is required.

Mitigation Measures

None required.

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

Environmental Evaluation

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

Setting

Information and analysis for Agricultural and Forest Services impacts are based on the City of Anaheim General Plan Land Use Element and the DOC Farmland Mapping and Monitoring Program (FMMP). In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by CAL FIRE regarding the State's inventory of forest land. Such information includes 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 ARB.

Would the project:

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

No impact. The project area is classified as Urban and Built-Up Land and is not adjacent to any farmlands, according to the DOC FMMP of the California Resources Agency.[5] The nearest farmland is classified as Unique Farmland and is located 1.5 miles south of the project site adjacent to the Union Pacific railroad. Additionally, there is farmland classified as Unique Farmland located 2.3 miles west of the project site near the intersection of Orange Avenue and South Sherill Street. The proposed project would not create impacts on any of these farmlands and would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to nonagricultural uses. Therefore, the proposed project would not have any significant impacts related to farmland conversion, and no impacts would occur.

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

No impact. The project site is currently zoned as C-G and would be rezoned as RM-3.5 (Exhibit 4: Zoning).[6] The project site is not currently zoned for agricultural uses, nor is it currently in agricultural production. Therefore, the proposed project would not conflict with any existing zoning for agricultural use. According to the DOC, the City of Anaheim does not contain Williamson Act Contract Land.[7] Therefore, the proposed project would not have any significant impacts related to potential conflicts with existing agricultural zoning or a Williamson Act Contract.

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

[5] California Department of Conservation (DOC). 2016. Important Farmland Finder. Website: https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed August 8, 2021.

[6] City of Anaheim. 2021. Zoning Title 18. Website: https://www.anaheim.net/DocumentCenter/View/1871/Zoning-Map?bidId=. Accessed August 8, 2021.

[7] California Department of Conservation (DOC). Division of Land Resource Protection. 2017. State of California Williamson Contract Land. Website: https://planning.lacity.org/eir/HollywoodCenter/Deir/ELDP/(E)%20Initial%20Study/Initial%20Study/Attachment%20B%20References/California%20Department%20of%20Conservation%20Williamson%20Map%202016.pdf. Accessed August 4, 2021.

No impact. The project site is currently zoned as C-G and would be rezoned as RM-3.5 (Exhibit 4).[8] The project site is not zoned as forest land or timberland and is not zoned for Timberland Production. Therefore, the proposed project would not conflict with existing zoning for Forest Land, Timberland, or timberland zoned Timberland Production. The proposed project would have no impacts related to forest land and timberland.

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

No impact. The project site is currently developed with office buildings and a parking lot and is located in an urbanized area. The project site does not currently contain forest land or agricultural land. Areas zoned as C-G or as RM-3.5 are not intended for forest uses. Therefore, the proposed project would not have any significant impacts related to loss or conversion of agricultural or forest land.

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

No impact. As discussed throughout this section, the proposed project would not result in impacts to farmland or forest land. The proposed project would not result in any other changes that could result in the conversion of farmland to non-agriculture uses or the conversion of forest land to non-forest uses. Therefore, there would be no impacts.

Mitigation Measures

None required.

[8] City of Anaheim. 2021. Zoning Title 18. Website: https://www.anaheim.net/DocumentCenter/View/1871/Zoning-Map?bidId=. Accessed August 8, 2021.

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

Environmental Evaluation

Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.

Setting

This analysis is partly based on the *Air Quality, Energy, and Greenhouse Gas Emissions Impact Analysis West Broadway Townhomes Project,* Vista Environmental, March 4, 2022, included in Appendix A.

Would the project:

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

Less than significant impact. To evaluate whether or not a project conflicts with or obstructs the implementation of the applicable air quality plan (2016 Air Quality Management Plan [AQMP] for the South Coast Air Basin [SoCAB]), the SCAQMD CEQA Air Quality Handbook states that there are two key indicators. These indicators are identified by the criteria discussed below.

1. **Indicator:** Whether the project would result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
2. **Indicator:** According to Chapter 12 of the SCAQMD CEQA Air Quality Handbook, the purpose of the General Plan consistency findings is to determine whether a project is inconsistent

with the growth assumptions incorporated into the air quality plan, and thus, whether it would interfere with the region's ability to comply with federal and California air quality standards.

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

Step 1: The project's contribution to air quality violations (SCAQMD's first indicator)
Step 2: Assumptions in AQMP (SCAQMD's second indicator)
Step 3: Compliance with applicable emission control measures in the AQMPs

Step 1: The Proposed Project's Contribution to Air Quality Violations

According to the SCAQMD, a project is consistent with the AQMP if the project would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.[9] If a project's emissions do not exceed the SCAQMD regional thresholds for volatile organic compounds (VOCs), nitrogen oxides (NO_X), carbon monoxide (CO), sulfur oxides (SO_X), or particulate matter (PM_{10} or $PM_{2.5}$), it follows that the project's emissions would not exceed the allowable limit for each project in order for the region to attain and maintain ambient air quality standards, which is the primary goal of air quality plans. As shown in Impact 2.3(b) below, the proposed project's regional construction and operational emissions would not exceed the SCAQMD regional thresholds of significance. Furthermore, as described in Impact 2.3(c) below, the proposed project's localized construction and operational emissions would not exceed the project location-specific SCAQMD localized construction and operational analyses use localized significance thresholds (LSTs). Considering this information, the proposed project's construction and operational emissions would not contribute substantially to potential air quality violations and thus would comply with the applicable air quality plan.

Step 2: Assumptions in the Air Quality Management Plan

The development of emission burdens used in AQMPs to demonstrate compliance with ambient air quality standards is based, in part, on land use patterns contained within local general plans. Therefore, it is reasonable to conclude that if a project is consistent with the applicable general plan land use designation, and if the general plan was adopted prior to the applicable AQMP, then the growth of Vehicle Miles Traveled (VMT) and/or population generated by said project would be consistent with the growth in VMT and population assumed within the AQMP. The City of Anaheim adopted its General Plan in 2004, which is prior to the adoption of the AQMP in 2016. The City adopted its General Plan Land Use Map in 2004 and has revised it as recently as March 2019. As previously discussed, the project site is currently designated as Office-Low (O-L) in the General Plan Land Use Plan and is zoned General Commercial (C-G). The proposed project consists of the development of 34 townhomes on 1.55 net acres, which would result in a density of 22 dwelling units per acre. As such, the project applicant is requesting a General Plan Amendment and Zoning

[9] South Coast Air Quality Management District (SCAQMD). 1993. CEQA Air Quality Handbook. April. Website: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993). Accessed March 16, 2022.

Amendment to redesignate and rezone the project site to Mid Density Residential, which allows for up to 27 dwelling units per acre, and to rezone the project site to RM-3.5, which allows a minimum building site area per dwelling unit of 1,600 square feet.

The proposed project would require a GPA to modify the land use designation from Office–Low to Mid Density Residential and a zone change from the C-G Zone to the RM-3.5 Zone. The proposed townhomes would be a compatible use to the existing multi-family residential uses that are located to the north, northeast, and south sides of the project site, and would provide housing in close proximity to the existing commercial uses to the west and the church and school to the east, which would promote a walkable community. The project site is also close to the Euclid-Broadway Orange County Transportation Authority (OCTA) bus stop that is located 350 feet west of the project site. Furthermore, the majority of the project trips and associated emissions associated with the project site would have been accounted for in the AQMP as trips and emissions associated with the existing Office-Low development. As further described in the Land Use and Planning section of this document, implementation of the proposed project would not cause any significant adverse effects associated with land use and planning. Emissions associated with the current allowable land use and the proposed use of the project site would be comparable. As described later in this document, under Population and Housing, impacts associated with the project's potential to induce substantial unplanned population growth was found to be less than significant. Considering the project's less than significant impacts related to land use and population, growth supported by the proposed project is reasonably accounted for in the AQMP.

Step 3: Control Measures

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

Summary

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

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

Less than significant impact. This impact is related to the cumulative effect of a project's regional criteria pollutant emissions. As described above, the region is currently in nonattainment for ozone, PM_{10}, and $PM_{2.5}$. By its nature, air pollution is largely a cumulative impact resulting from emissions generated over a large geographic region. The nonattainment status of regional pollutants is a result of past and present development within the SoCAB, and this regional impact is a cumulative impact. In other words, new development projects (such as the proposed project) within the SoCAB would

contribute to this impact only on a cumulative basis. No single project would be sufficient in size, by itself, to result in nonattainment of regional air quality standards. Instead, a project's emissions may be individually limited, but cumulatively considerable when taken in combination with past, present, and future development projects. All new development that would result in an increase in air pollutant emissions above those assumed in regional air quality plans would contribute to cumulative air quality impacts.

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

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

The proposed project's regional construction and operational emissions, which include both on- and off-site emissions, are evaluated separately below. Construction and operational emissions from the proposed project were estimated using the California Emissions Estimator Model (CalEEMod) version 2020.4.0. A detailed description of the assumptions used to estimate emissions and the complete CalEEMod output files are contained in Appendix A.

Cumulative Construction Emissions

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

Table 3 presents the proposed project's maximum daily construction emissions for each construction activity and during the entire construction duration using the worst-case summer or winter daily construction-related criteria pollutant emissions for each construction phase. All construction activities would comply with applicable SCAQMD rules and regulations, including Rule 403, to minimize fugitive PM dust emissions. For detailed assumptions, methodologies, and models used to estimate emissions, please refer to Appendix A, Section 8, Modeling Parameters and Assumptions.

Table 3: Project-Generated Regional Construction Emissions

Construction Activity	Regional Pollutant Emissions (pounds per day)1					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Demolition	1.77	17.96	14.76	0.03	1.68	0.95
Site Preparation	1.35	14.92	7.45	0.02	3.20	1.78
Grading	1.62	18.63	10.01	0.03	3.82	2.11
Building Construction—2022	1.78	12.96	14.04	0.03	1.05	0.69
Combined Building Construction - 2023, Paving and Architectural Coatings	32.27	19.65	25.05	0.04	1.57	1.03
Project Maximum Daily Emissions	**32.27**	**19.65**	**25.05**	**0.04**	**3.82**	**2.11**
SCAQMD Significance Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
CO = carbon monoxide
NO_X = oxides of nitrogen
PM_{10} = particulate matter with aerodynamic diameter less than 10 microns
$PM_{2.5}$ = particulate matter with aerodynamic diameter less than 2.5 microns
SCAQMD = South Coast Air Quality Management District
SO_X =sulfur oxides
VOC = volatile organic compounds
[1] Assumes compliance with SCAQMD Rule 403.
Source of emissions: CalEEMod Output (see Appendix A).
Source of thresholds: South Coast Air Quality Management District (SCAQMD) 2015.

As shown in Table 3, the proposed project's regional daily construction emissions would not exceed any of SCAQMD's thresholds of significance. Therefore, the proposed project would not result in a cumulatively considerable net increase in construction emissions, and this impact would be less than significant.

Cumulative Operational Emissions

Following construction of the proposed project, long-term operational emissions would be generated from day-to-day project operations. Operational emissions for land use development projects are typically distinguished as mobile-, area-, and energy-source emissions. Mobile-source emissions are those associated with automobiles that would travel to and from a project site. Area-source emissions are those associated with natural gas combustion for space and water heating, landscape maintenance activities, and periodic architectural coatings. Energy-source emissions are those associated with electricity consumption and are more pertinent for greenhouse gas (GHG) emissions than for air quality pollutants. For detailed assumptions, methodologies, and models used to estimate emissions, please refer to Appendix A, Section 8, Modeling Parameters and Assumptions. As described in Appendix A, the proposed project would demolish and remove the existing office buildings and associated driveways. Emissions from the existing office buildings and driveways were estimated according to the parameters presented in Appendix A and were included in the baseline

emissions when determining net project operational emissions. Table 4 presents the proposed project's maximum daily operational emissions between summer and winter seasons.

Table 4: Operational Regional Pollutants

Operational Activity	Regional Pollutant Emissions (pounds per day)[1]					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area	1.49	0.03	2.80	<0.00	0.02	0.02
Energy	0.02	0.14	0.06	<0.00	0.01	0.01
Mobile	0.66	0.66	6.09	0.01	1.53	0.41
Total Net Project Daily Emissions	**2.17**	**0.84**	**8.95**	**001**	**1.55**	**0.44**
SCAQMD Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
VOC = volatile organic compounds
NO_X = oxides of nitrogen
CO = carbon monoxide
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
PM_{10} = particulate matter with aerodynamic diameter less than 10 microns
$PM_{2.5}$ = particulate matter with aerodynamic diameter less than 2.5 microns
[1] Emissions shown represent the maximum daily emissions from summer and winter seasons for each operational emission source and pollutant. Therefore, total daily operational emissions represent maximum daily emissions that could occur throughout the year.
Source of emissions: CalEEMod Output (see Appendix A).
Source of thresholds: South Coast Air Quality Management District (SCAQMD) 2015.

As shown in Table 3, the proposed project's net daily operational emissions would not exceed any of SCAQMD's thresholds of significance. Considering that the proposed project's net long-term operational emissions would not exceed any significance thresholds, the proposed project would not result in a cumulatively considerable net increase of operational emissions. The cumulative impact from long-term operation of the proposed project would therefore be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than significant impact. This impact evaluates the potential for the proposed project's construction and operational emissions to expose sensitive receptors to substantial pollutant concentration. Sensitive receptors are defined as those individuals who are sensitive to air pollution, including children, the elderly, and persons with preexisting respiratory or cardiovascular illness. For purposes of CEQA, the SCAQMD considers a sensitive receptor to be a location where a sensitive individual could remain for 24 hours, such as residences, hospitals, or convalescent facilities.[10] Commercial and industrial facilities are not included in the definition because employees do not

[10] South Coast Air Quality Management District (SCAQMD). (2006). Final –Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds. October. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/particulate-matter-(pm)-2.5-significance-thresholds-and-calculation-methodology/final_pm2_5methodology.pdf?sfvrsn=2. Accessed March 16, 2022.

typically remain on-site for 24 hours. However, when assessing the impact of pollutants with 1-hour or 8-hour standards (such as NO_2 and CO), commercial and/or industrial facilities would be considered sensitive receptors.

The closest sensitive receptors to the project site are residents at the multi-family homes located as near as 50 feet north of the project site. The nearest school is Loara Elementary School, which is located as near as 135 feet east of the project site. This analysis evaluates the potential for construction- and operational-related criteria air pollutant, ozone precursor, and toxic air contaminant (TAC) emissions to impact sensitive receptors.

Localized Significance Threshold Analysis—Criteria Pollutants

The localized construction and operational analyses use thresholds (i.e., LSTs) represent the maximum emissions for a project that would not cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standard.[11] LSTs are based on the ambient concentrations of that pollutant within the Source Receptor Area where a project is located, the distance to the nearest sensitive receptor, and the size of the project site, all of which are the primary factors that influence pollutant concentrations. If a project's construction or operational emissions are under those thresholds, it follows that the project would not cause or contribute to an exceedance of the standard and would not expose sensitive receptors to substantial pollutant concentrations.

Localized Construction Analysis

As discussed in Section 8 of the Air Quality and Greenhouse Gas Analysis Report (Modeling Parameters and Assumptions; see Appendix A), the LST Methodology only applies to on-site emissions and states that "off-site mobile emissions from the project should not be included in the emissions compared to LSTs." Therefore, for purposes of the construction LST analysis, only on-site emissions are compared with the applicable LSTs. As outlined in Appendix A, Section 9.2, Thresholds of Significance, the project site is located in Air Monitoring Area 17, which covers the central portion of Orange County. The Lookup Tables provided in the LST Methodology include project site acreage sizes of 1-acre, 2-acres, and 5-acres. Since the project site is 1.55 acres, the 1-acre and 2-acre project sites shown in the Lookup Tables were interpolated in order to calculate the 1.55-acre threshold that has been utilized in this analysis. According to the SCAQMD, Southern California is divided into 41 Source Receptor Areas. The nearest off-site sensitive receptors are residents at the multi-family homes located as near as 50 feet (15 meters) north of the project site. According to LST Methodology, any receptor located closer than 25 meters (82 feet) shall be based on the 25-meter thresholds. Table 4 presents the proposed project's maximum daily on-site emissions compared with the applicable LSTs. Emissions estimates account for implementation of SCAQMD Rule 403, which is required for all projects regardless of significance.

[11] South Coast Air Quality Management District (SCAQMD). (2006). Final –Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds. October. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/particulate-matter-(pm)-2.5-significance-thresholds-and-calculation-methodology/final_pm2_5methodology.pdf?sfvrsn=2. Accessed March 16, 2022.

Table 5: Comparison of Construction LSTs and Project Construction Emissions

Activity	Maximum On-site Emissions (pounds per day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Demolition	16.79	14.06	1.42	0.88
Site Preparation	14.66	7.14	3.08	1.75
Grading	17.19	9.32	3.55	2.03
Building Construction—2022	12.56	12.89	0.65	0.58
Combined Building Construction, Paving and Architectural Coatings – 2023	20.10	23.58	1.08	0.95
Maximum Daily Construction Emissions	**20.10**	**23.58**	**3.55**	**2.03**
Construction Localized Significance Threshold[1]	**100**	**12**	**5**	**7**
Exceed Threshold?	**No**	**No**	**No**	**No**

Notes:
CO = carbon monoxide
NO_X = nitrogen oxides
PM_{10} = particulate matter with aerodynamic diameter less than 10 microns
$PM_{2.5}$ = particulate matter with aerodynamic diameter less than 2.5 microns
Phases are assumed to not overlap; therefore, the maximum daily emissions are from the highest representative phase.
PM_{10} and $PM_{2.5}$ emissions are from the mitigated output to reflect compliance with SCAQMD Rule 403—Fugitive Dust.
[1] The nearest off-site sensitive receptors to the project site are multi-family homes located as near as 50 feet (15 meters) north of the project site. According to SCAQMD methodology, all receptors closer than 25 meters are based on the 25-meter threshold.
Source of emissions: CalEEMod Output (Appendix A).
Source of thresholds: South Coast Air Quality Management District (SCAQMD) 2009, for Source Receptor Area 17, 25 meters, 5-acre site.

As shown in Table 5, the proposed project's maximum daily on-site emissions would not exceed any of the applicable SCAQMD LSTs. Therefore, the proposed project's construction activities would not cause or contribute substantially to an existing or future ambient air quality standard violation. Accordingly, the proposed project's construction-related criteria air pollutant and ozone precursor concentrations would not expose sensitive receptors to substantial pollutant concentrations. This impact would be less than significant.

Localized Operational Analysis

Similar to the construction LST analysis above, the applicable operational LSTs were obtained for a project located in Source Receptor Area 17. As described above, the LST Methodology recommends that only on-site emissions are evaluated using LSTs. Because a majority of the proposed project's mobile-source emissions would occur on the local and regional roadway network away from the project site, only the on-site area-, energy-, and mobile-source emissions were included in this analysis. Table 6 presents the proposed project's maximum daily on-site emissions compared with the applicable LSTs.

Table 6: Comparison of Operational LSTs and Project Operational Emissions(Unmitigated)

Operational Activity	On-site Emissions (pounds per day)[1]			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Area	0.03	2.80	0.02	0.02
Energy	0.14	0.06	0.01	0.01
Mobile	0.02	0.15	0.04	0.01
Maximum On-site Daily Emissions	**0.19**	**3.02**	**0.06**	**0.04**
Operations Localized Significance Threshold	**100**	**612**	**2**	**1**
Exceed Threshold?	**No**	**No**	**No**	**No**

Notes:
CO = carbon monoxide
NO_X= nitrogen oxides
PM_{10} = particulate matter with aerodynamic diameter less than 10 microns
$PM_{2.5}$ = particulate matter with aerodynamic diameter less than 2.5 microns
SCAQMD = South Coast Air Quality Management District
Unmitigated results were used to calculate totals.
[1] The nearest off-site sensitive receptors to the project site are multi-family homes located as near as 50 feet (15 meters) north of the project site. According to SCAQMD methodology, all receptors closer than 25 meters are based on the 25-meter threshold.
Source: Calculated from SCAQMD's Mass Rate Lookup Tables for one and two acres in Air Monitoring Area 17, Central Orange County.

As shown in Table 5, the proposed project's maximum daily on-site operational emissions would not exceed any of the applicable SCAQMD LSTs. Therefore, the proposed project's operational activities would not cause or contribute substantially to an existing or future ambient air quality standard violation. Accordingly, the proposed project's operational criteria air pollutant and ozone precursor concentrations would not expose sensitive receptors to substantial pollutant concentrations. This impact would be less than significant.

Toxic Air Pollutants—On-site Workers

A variety of state and national programs protect workers from safety hazards, including high air pollutant concentrations, according to the California Division of Occupational Safety and Health (Cal/OSHA) and the Centers for Disease Control and Prevention (CDC).[12]

On-site workers are not required to be addressed through this Health Risk Assessment (HRA) process. A document published by the California Air Pollution Control Officers Association (CAPCOA), Health Risk Assessments for Proposed Land Use Projects, indicates that on-site receptors are included in risk assessments if they are persons not employed by the project.[13] Persons not

[12] Centers for Disease Control and Prevention (CDC). 2012. Healthy Housing Reference Manual, Chapter 5: Indoor Air Pollutants and Toxic Materials. Website: https://www.cdc.gov/nceh/publications/books/housing/cha05.htm. Accessed March 16, 2022.
[13] California Air Pollution Control Officers Association (CAPCOA). 2009. Health Risk Assessments for Proposed Land Use Projects. Website: http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA_HRA_LU_Guidelines_8-6-09.pdf. Accessed March 16, 2022.

employed by the proposed project would not remain on-site for any significant period. Therefore, an HRA for on-site workers is not required or recommended.

Toxic Air Pollutants—Construction

Construction activities associated with the proposed project are anticipated to generate TAC emissions from diesel particulate matter (DPM) associated with the operation of trucks and off-road equipment and from possible asbestos in the structures to be demolished.

Diesel Particulate Matter Emissions

The greatest potential for TAC emissions would be related to DPM emissions associated with heavy equipment operations during construction of the proposed project. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of "individual cancer risk." "Individual cancer risk" is the likelihood that a person exposed to concentrations of TACs over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. It should be noted that the most current cancer risk assessment methodology recommends analyzing a 30-year exposure period for the nearby sensitive receptors.[14]

Given the relatively limited number of heavy-duty construction equipment, the varying distances that construction equipment would operate to the nearby sensitive receptors, and the short-term construction schedule, the proposed project would not result in a long-term (i.e., 30 or 70 years) substantial source of TAC emissions and corresponding individual cancer risk. In addition, California Code of Regulations Title 13, Article 4.8, Chapter 9, Section 2449 regulates emissions from off-road diesel equipment in California. This regulation limits idling of equipment to no more than 5 minutes and requires equipment operators to label each piece of equipment and provide annual reports to ARB of their fleet's usage and emissions. This regulation also requires systematic upgrading of the emission Tier level of each fleet, and currently no commercial operator is allowed to purchase Tier 0 or Tier 1 equipment, and by January 2023 no commercial operator is allowed to purchase Tier 2 equipment. In addition to the purchase restrictions, equipment operators need to meet fleet average emissions targets that become more stringent each year between years 2014 and 2023. As of January 2019, 25 percent or more of all contractors' equipment fleets must be Tier 2 or higher. Therefore, no significant short-term TAC impacts from DPM emissions would occur during construction of the proposed project.

Asbestos Emissions

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

[14] Office of Environmental Health Hazard Assessment (OEHHA). 2015. Air Toxics Hot Spots Program Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments. February. Website: https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf. Accessed March 16, 2022.

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

As such, construction of the proposed project would result in a less than significant exposure of sensitive receptors to substantial pollutant concentrations.

Toxic Air Pollutants—Operations

Common sources of TACs include high-traffic freeways, distribution centers, large gas-dispensing facilities, and dry cleaners. The proposed project would not include those uses and therefore would not emit TACs.

Local CO Hotspot Impacts from Project-Generated Vehicle Trips

CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential impacts to sensitive receptors. The analysis provided in Appendix A, Section 10.3, Impact Analysis, shows that no local CO Hotspots are anticipated to be created at any nearby intersections from the vehicle traffic generated by the proposed project. Therefore, operation of the proposed project would result in a less than significant exposure of off-site sensitive receptors to substantial pollutant concentrations.

Local Criteria Pollutant Impacts from On-site Operations

The local air quality impacts from the operation of the proposed project would occur from on-site sources such as architectural coatings, landscaping equipment, and on-site usage of natural gas appliances. The analysis provided in Appendix A, Section 10.3, Impact Analysis, found that the operation of the proposed project would not exceed the local NO_X, CO, PM_{10} and $PM_{2.5}$ thresholds of significance discussed above in Appendix A, Section 9.2, Thresholds of Significance. Therefore, the ongoing operations of the proposed project would create a less than significant operations-related impact to local air quality due to on-site emissions, and no mitigation would be required.

Operations-Related Toxic Air Contaminant Impacts

Particulate matter (PM) from diesel exhaust is the predominant TAC in most areas and according to The California Almanac of Emissions and Air Quality 2013 Edition prepared by the ARB, about 80 percent of the outdoor TAC cancer risk is from diesel exhaust. Some chemicals in diesel exhaust, such as benzene and formaldehyde, have been listed as carcinogens by State Proposition 65 and the Federal Hazardous Air Pollutants program. Because of the nominal number of diesel truck trips that are anticipated to be generated by the ongoing operation of the proposed townhomes, a less than significant TAC impact would be created from the ongoing operations of the proposed project, and no mitigation would be required.

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

Less than significant impact. Odors can cause a variety of responses. The impact of an odor is dependent on interacting factors such as frequency (how often), intensity (strength), duration (in

time), offensiveness (unpleasantness), location, and sensory perception. While offensive odors rarely cause any physical harm, they still can be very unpleasant, leading to considerable distress and often generating citizen complaints to local governments and regulatory agencies. Odor-related symptoms reported in a number of studies include nervousness, headache, sleeplessness, fatigue, dizziness, nausea, loss of appetite, stomachache, sinus congestion, eye irritation, nose irritation, runny nose, sore throat, cough, and asthma exacerbation.[15]

The SCAQMD's role is to protect the public's health from air pollution by overseeing and enforcing regulations. The SCAQMD's resolution activity for odor compliance is mandated under California Health and Safety Code Section 41700, and falls under SCAQMD Rule 402. This rule states, "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property."

Construction-related Odors

Potential sources that may emit odors during construction activities include exhaust from diesel construction equipment. However, because of the temporary nature of these emissions, the intermittent nature of construction activities, and the highly diffusive properties of DPM exhaust, nearby receptors would not be affected by diesel exhaust odors associated with project construction. Odors from these sources would be localized and generally confined to the immediate area surrounding the project site. The proposed project would utilize typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. Impacts would be less than significant.

Operational-related Odors

The proposed project would develop multi-family residential uses that would not be considered typical odor-generating land uses. Land uses typically considered associated with odors include wastewater treatment facilities, waste disposal facilities, or agricultural operations. Minor sources of odors, such as exhaust from mobile sources, are not typically associated with numerous odor complaints, but are known to have temporary and less concentrated odors. The vehicle trips generated by the proposed project would occur throughout the day, so the exhaust would not be heavily concentrated for extended periods. Considering the low intensity of potential odor emissions, the proposed project's operational activities would not expose receptors to objectionable odor emissions. Impacts would be less than significant.

Mitigation Measures

None required.

[15] South Coast Air Quality Management District (SCAQMD).2007 Air Quality Management Plan. June. Website: https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/2007-air-quality-management-plan. Accessed March 16, 2022.

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

Environmental Evaluation

Setting

The findings of this section are based, in part, on the results of the site visit conducted on August 2, 2021, by FirstCarbon Solutions (FCS) Biologist Kimberly Gibson, and are included in Appendix B. The project site is located in highly developed and urbanized area of the City of Anaheim. The project site consists of office buildings and a parking lot, with most currently in operations as doctor offices and pharmacies.

Vegetation present is entirely ornamental with several jacaranda trees (*Jacaranda mimosifolia*) and palms trees present as well as ornamental shrubs and plotted plants in front of some of the operational buildings. There are several of patches of lawn grasses with lavender (*Lavandula* sp.), pothos (*Epipremnum aureum*), agave (*Agave* sp.), and heavenly bamboo (*Nandina domestica*). Wildlife activity during the site visit was low and consisted entirely of avian species. Species observed included rock pigeons (*Columba livia*), Anna's hummingbird (*Calypte anna*), black phoebe (*Sayornis nigricans*), and house finch (*Haemorhous mexicanus*).

Would the project:

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

Less than significant impact with mitigation incorporated. An FCS Biologist reviewed the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB), a special-status species and plant community account database, the United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) system, and the California Native Plant Society Electronic Inventory (CNPSEI) of Rare and Endangered Vascular Plants of California database for the *Anaheim, California* USGS 7.5-minute Topographic Quadrangle Map and its eight neighboring quads.[16,17,18]

The literature search found that 43 special-status plant species and 45 special-status animal species have been recorded within the regional vicinity of the project site. Of these species, eight special-status plants and 17 special-status animal species have been recorded within 5 miles of the project site (Appendix B). The overwhelming majority of these species are not expected to occur due to the lack of suitable habitat on the project site, the project site being situated outside of their known geographic range or have been have locally extirpated due to extensive urbanization and habitat modification of the surrounding area. No special-status plant species are expected to occur due the lack of natural vegetation communities and lack of suitable natural substrate present on-site.

The project site is entirely developed and contains little suitable habitat for most special-status animal species. The site does contain over a dozen of ornamental trees of sufficient size to provide suitable nesting locations for native migratory or resident birds that are protected under the Migratory Bird Treaty Act (MBTA) and/or CDFW Code. Additionally, smaller birds could nest within the eaves of the existing buildings or on top of the several light posts and telephone poles found on-site. Suitable nesting trees are present on properties immediately adjacent the project site as well. As a result, there is still potential, albeit very low potential, that special-status birds may choose to nest on-site or within the immediate vicinity.

[16] California Department of Fish and Wildlife (CDFW). 2021. CNDDB RareFind 5 California Natural Diversity Database Query for Special-Status Species. Website: https://map.dfg.ca.gov/rarefind/view /RareFind.aspx. Accessed May 6, 2021.

[17] United States Fish and Wildlife Service (USFWS). 2021 Information for Planning and Consultation (IPaC). Website: https://ecos.fws.gov/ipac/. Accessed May 6, 2021.

[18] California Native Plant Society (CNPS). 2020. California Native Plant Society Rare and Endangered Plant Inventory (CNPSEI). Website: http://www.rareplants.cnps.org/. Accessed May 6, 2021.

The development of the proposed project has the potential to impact protected bird nests due to the removal of this vegetation or indirectly harm birds though the generation of noise, lights, and other man-made disturbances that could result in the abandonment of eggs or young. Compliance with the regulatory requirements of the federal MBTA and Sections 3503, 3503.5, 3513 of the California Fish and Game Code, which protect active nests of avian species including common raptor species. As per MM BIO-1, removal of trees and vegetation shall be avoided during the nesting season (generally February 1 to August 31). If site preparation activities are proposed during the nesting/breeding season, a qualified Biologist shall prepare a pre-construction survey within 72 hours prior to vegetation removal to determine whether active nests of species protected by the MBTA or the CDFW Code are present in the construction zone. With implementation of MM BIO-1 impacts related to candidate, sensitive, or special-status species would be less than significant.

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

No impact. The project site is entirely developed and surrounded by extensive urban development in all directions. The site does not contain any naturally occurring vegetation communities that could be considered as sensitive such as riparian or coastal sage scrub habitats. Therefore, no impact would occur.

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. The project site is entirely developed and no wetlands or other hydrological features that meet criteria as waters of the United States or waters of the State are present within the proposed project site. Additionally, the project site is not located adjacent to any known potentially jurisdictional water body. No impact would occur.

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

Less than significant impact. The project site is entirely developed and is surrounded in all directions by extensive urban development, including roadways and other man-made structures that serve as barriers to wildlife movement. Therefore, no impact would occur.

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

No impact. The project site contains 19 ornamental trees including 12 Mexican fan palms (*Washingtonia robusta*), two queen palms (*Syagrus romanzoffiana*), two jacaranda trees (*Jacaranda mimosifolia*) and three beaked yuccas (*Yucca rostrata*). All 19 trees would need to be removed to accommodate the proposed project.

FCS reviewed the Anaheim Municipal Code regarding any applicable ordinances regarding tree preservation. [19] The project site is not located within the Scenic Corrdior Overlay Zone where additional tree preservation ordinances would apply.[20] The project site does not contain any "Landmark Trees" as defined by the Anaheim Municipal Code. None of the trees present on-site are located along the planting strip bordering Broadway and therefore likely do not meet the City's definition as a "Street Tree" and be subject to the City's Street Tree Ordinance.[21] Therefore, the proposed project would not have any significant impacts related to conflicts with local policies or ordinances protecting biological resources.

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

No impact. The proposed project lies within boundaries the OCTA Natural Community Conservation Plan/Habitat Conservation Plan, but it is not applicable to the proposed project.[22] This plan only applies to highway improvement and does not apply to mixed use developments such as the proposed project. Therefore, no impact would occur.

Mitigation Measures

MM BIO-1 Protection of Active Bird Nests (includes pre-construction survey and implementation of avoidance buffer, if found).

1. The removal of trees and vegetation shall be avoided during the nesting season (generally February 1 to August 31), if feasible. If avoidance of tree and vegetation removal during the nesting season is infeasible, then the following measures shall be required:
   a. If ground-disturbing or vegetation-removing construction activities occur during the nesting season (February 1 to August 31), pre-construction surveys shall be conducted by a qualified Biologist within 72 hours prior to scheduled tree removal, to determine whether or not active nests are present in the construction zone.
   b. If an active nest is located during pre-construction surveys, a qualified Biologist shall determine an appropriately sized avoidance buffer based on the species and anticipated disturbance level. A qualified Biologist shall delineate the avoidance buffer using Environmentally Sensitive Area fencing, pin flags, and or yellow caution tape. The buffer zone shall be maintained around the active nest site(s) until the young have fledged and are foraging independently. No construction activities or construction foot traffic is allowed to occur within the avoidance buffer(s).

[19] Anaheim Municipal Code. 2021. City of Anaheim. Website: https://codelibrary.amlegal.com/codes/anaheim/latest/overview. Accessed May 6, 2021.
[20] Anaheim Municipal Code. 2021. Chapter 18.18.040 Tree Preservation. City of Anaheim. Website: https://codelibrary.amlegal.com/codes/anaheim/latest/anaheim_ca/0-0-0-66504. Accessed April 14, 2021.
[21] Anaheim Municipal Code. 2021. Chapter 13.12 STREET TREES*. City of Anaheim. Website: https://codelibrary.amlegal.com/codes/anaheim/latest/overview. Accessed April 14, 2021.
[22] California Department of Fish and Wildlife (CDFW). 2020. NCCP Plan Summaries. Website: https://wildlife.ca.gov/conservation/planning/nccp/plans. Accessed April 6, 2021.

c. The qualified Biologist shall monitor the active nest during construction activities to prevent any potential impacts that may result from the construction of the proposed project, until the young have fledged.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.5 Cultural Resources and Tribal Cultural Resources *Would the project:*				
a) Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
d) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☒	☐	☐
e) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (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.	☐	☒	☐	☐

Environmental Evaluation

Setting

This section describes the existing cultural resources and Tribal Cultural Resources (TCR) setting and potential impacts from project implementation. The descriptions and analysis in this section are based, in part, on information provided by the California Native American Heritage Commission (NAHC), South Central Coastal Information Center (SCCIC), National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), California Historical Landmarks list, California Points of Historical Interest list (CPHI), California Built Environment Resource Directory (BERD) for Orange County. Relevant non-confidential records search results, NAHC correspondence, and paleontological reports are provided in Appendix C.

South Central Coastal Information Center

A records search and literature review were conducted on September 23, 2021, at the SCCIC located at California State University, Fullerton for the project site and the 0.5-mile radius surrounding the project site. The purpose of this review was to access existing cultural resource survey reports, archaeological site records, historic aerial photographs, and historic maps and evaluate whether any previously documented prehistoric or historic archaeological sites, architectural resources, cultural landscapes, or other resources exist within or near the project site.

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

Pedestrian Survey and Site Visit

On October 6, 2021, FCS Staff Archaeologist, Natalie Adame conducted a pedestrian survey for unrecorded cultural resources at the project site. The survey covered the subject property in its entirety, beginning in the northeast corner of the project site and moving west, using north–south transects spaced at standard 15-meter intervals whenever possible. The project site is entirely developed, consisting of several medical offices, a residential unit and minor associated landscaping elements. Visibility of native soils was therefore very poor, less than 5 percent, and only in areas of minor landscaping. Soils in sections of poor visibility were intermittently inspected using a hand trowel. Observed soils consisted of yellowish-brown silty sand (Munsell 10YR 5/6). Survey conditions were documented using digital photographs and field notes. During the survey, Ms. Adame examined all areas of the exposed ground surface for prehistoric artifacts (e.g., fire-affected rock, milling tools, flaked stone tools, tool-making debris, ceramics), soil discoloration and depressions that might indicate the presence of a cultural midden, faunal and human osteological remains, and features indicative of the former presence of structures or buildings (e.g., postholes, standing exterior walls, foundations) or historic debris (e.g., glass, metal, ceramics). Particular attention was paid to the built environment and recording buildings and structures that appeared to be over 45 years of age. A review of historic aerials indicates that there are two structures over the age of 45 located within the project boundaries that have not been previously evaluated.

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

Native American Heritage Commission

On July 29, 2021, FCS sent a request to the NAHC on behalf of the City of Anaheim in an effort to determine whether any sacred sites are listed on its Sacred Lands File (SLF) for the project site and its 0.5-mile search radius, and to receive a consultation list of any tribal representatives who may be interested in consulting on the project pursuant to Assembly Bill (AB) 52.

A response was received on August 27, 2022, indicating that the SLF search results did not locate the presence of Native American cultural resources in the immediate project area. The NAHC included a list of 17 tribal representatives available for consultation. To ensure that all Native American knowledge and concerns over potential TCRs that may be affected by the project are addressed, FCS sent a letter containing project information and requesting any additional information to each Tribal Representative on September 2, 2021. On November 23, 2021, the Gabrieleño Band of Mission Indians-Kizh Nation requested full-time monitoring during all ground-disturbing activities and that their recommendations be included as mitigation measures within the CEQA document. On December 20, 2021, the Juaneño Band of Mission Indians requested full-time monitoring during ground disturbance in native soil. The tribe also provided recommendations that have been included as mitigation measures within the CEQA document.

Historic Built Environment Assessment

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

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

Two built environment resources more than 45 years old were identified within the project site: 1661 West Broadway constructed circa 1958 and 1673 West Broadway constructed circa 1963. The buildings were recorded and evaluated for historical significance on the appropriate set of California Department of Parks and Recreation (DPR) Forms in consideration of CRHR and City designation criteria and integrity requirements (Appendix C). The property was found ineligible under all designation criteria due to a lack of significant historical associations and architectural merit. No historical resources were identified within the project site as a result of this study.

Cultural Resources

Would the project:

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

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

The records search conducted at the SCCIC for the project site determined that 10 historical resources have been recorded within the 0.5-mile search radius, none of which are located the project site. Additionally, the pedestrian survey identified two potentially historic structures, which was evaluated by South Environmental, included in Appendix C, and was found ineligible under all designation criteria due to a lack of significant historical associations and architectural merit. No other potential resources were identified during the pedestrian survey; however, it is possible that earthmoving activities associated with project construction could encounter previously undiscovered historical resources. Historical resources can include but are not limited to stone, bone, or wood artifacts or features, or sites including privies, standing structures, or fences. Damage or destruction of these resources would be a potentially significant impact; thus, implementation of Mitigation Measure (MM) CUL-1 would establish a procedure for handling historical resources that may be discovered prior to and during project construction. Therefore, impacts associated with historical resources would be less than significant with mitigation incorporated.

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

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

The records search conducted at the SCCIC for the project site and its 0.5-mile surrounding radius, failed to identify any archaeological resources. In addition, the results of the pedestrian survey did not locate or identify any archaeological resources. Nevertheless, it is possible that earthmoving activities associated with project construction could encounter previously undiscovered archaeological resources. Archaeological resources can include but are not limited to stone, bone, wood or shell artifacts or features, including hearths and structural elements. Damage or destruction of these resources would be a potentially significant impact. Implementation of MM CUL-1 would ensure that this potential impact is reduced to a less than significant level.

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

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

In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5, Health and Safety Code Section 7050.5, and Public Resources Code Sections 5097.94 and 5097.98 must be followed. MM CUL-2 further specifies the procedures to follow in the event human remains are uncovered. Along with compliance with these guidelines and statutes, implementation of this mitigation would reduce potential impacts related to human remains to a less than significant level.

Tribal Cultural Resources

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

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

Less than significant impact with mitigation incorporated. The records search conducted at the SCCIC, which included a search of the CRHR, did not identify any listed or eligible TCRs that would be adversely affected by the proposed project. Additionally, the NAHC SLF's search results did not identify any TCRs in the project vicinity. Should any undiscovered TCRs be encountered during project construction, implementation of MM CUL-1 and MM CUL-2, would reduce potential impacts to a less than significant level.

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

Less than significant impact with mitigation incorporated.

No TCRs significant to the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1 have been identified by the Lead Agency. FCS conducted tribal outreach with the 17 tribal representatives identified by the NAHC. In compliance with AB 52, the City distributed letters to Native American tribes that have previously requested notification for AB 52 consultation, notifying each tribe of the opportunity to consult with the City regarding the proposed project. Consultation letters were mailed on September 2, 2021.

On November 23, 2021, the Gabrieleño Band of Mission Indians-Kizh Nation requested full-time monitoring during all ground-disturbing activities and that their recommendations be included as mitigation measures within the CEQA document. On December 20, 2021, the Juaneño Band of Mission Indians requested full-time monitoring during ground disturbance in native soil. The tribe also provided recommendations to be included as mitigation measures within the CEQA document.

To reduce potential impacts, and consistent with input from tribal representatives, should any undiscovered TCRs be encountered during project construction, implementation of MM CUL-1 and CUL-2, in addition to the MM TCR-1 through MM TCR-3 provided by the Juaneño Band of Mission Indians and the Gabrieleño Band of Mission Indians-Kizh Nation, would reduce potential impacts to a less than significant level.

Cultural Resources Mitigation Measures

MM CUL-1 An Archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology shall perform an inspection of the site for potential archaeological resources once grubbing, ground clearing, and demolition are complete, and prior to any grading or project-related ground disturbance. In the event exposed soils indicate cultural materials may be present, this may be followed by regular or periodic archaeological monitoring as determined by the Archaeologist, but full-time archaeological monitoring is not required at this time.

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

If the resources are determined to be unique historic resources as defined under Section 15064.5 of the CEQA Guidelines, mitigation measures shall be identified by the Archaeological Monitor and recommended to the Lead Agency. Appropriate mitigation measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds.

No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these resources. Any archaeological artifacts

recovered as a result of mitigation shall be donated to a qualified scientific institution approved by the Lead Agency where they would be afforded long-term preservation to allow future scientific study.

MM CUL-2 In the event of an accidental discovery or recognition of any human remains, Public Resources Code Section 5097.98 must be followed. In this instance, once project-related earthmoving begins and if there is accidental discovery or recognition of any human remains, the following steps shall be taken:

1. There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the County Coroner is contacted to determine whether the remains are Native American and if an investigation of the cause of death is required. If the Coroner determines the remains to be Native American, the Coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours, and the NAHC shall identify the person or persons it believes to be the "most likely descendant" of the deceased Native American. The Most Likely Descendant (MLD) may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains, and any associated grave goods as provided in Public Resources Section 5097.98, or
2. Where the following conditions occur, the landowner or his/her authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity either in accordance with the recommendations of the MLD or on the project site in a location not subject to further subsurface disturbance:
   - The NAHC is unable to identify a MLD or the MLD failed to make a recommendation within 48 hours after being notified by the commission.
   - The descendant identified fails to make a recommendation.
   - The landowner or his authorized representative rejects the recommendation of the descendant, and the mediation by the NAHC fails to provide measures acceptable to the landowner.

Tribal Cultural Resources Mitigation Measures

MM TCR-1 **Retention of a Native American Monitor Prior to Commencement of Ground-Disturbing Activities**

Prior to the commencement of any grading and/or construction activity, the owner/developer shall coordinate with the Gabrieleño Band of Mission Indians–Kizh Nation Native American tribe in retention of a Native American Monitor (Tribal Monitor) and a copy of the executed contract shall be submitted to the City of Anaheim Planning and Building Department. The Tribal Monitor shall only be present on-site during the construction phases

that involve ground-disturbing activities within undisturbed native sediments. Ground-disturbing activities may include, but are not limited to, demolition of existing structures, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the project site. The Tribal Monitor shall complete daily monitoring logs that shall provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the project site grading and excavation activities are completed, or when the Tribal Representatives and Monitor have indicated that the project site has a low potential for impacting archaeological or Tribal Cultural Resources (TCRs).

MM TCR-2 **Unanticipated Discovery of Human Remains and Associated Funerary Objects**

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

MM TCR-3 **Procedures for Burials and Funerary Remains**

In the event that human remains are uncovered during ground-disturbing activities, the owner/developer shall cease ground-disturbing activities and contact the County Coroner, Tribal Monitor, and Archaeologist to inform of the discovery. The owner/developer shall coordinate and consult with the County Coroner, Tribal Monitor and Archaeologist for advisory on the matter, protocol, and any applicable mitigating requirements. Additionally, If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as the Native American Heritage Commission (NAHC) shall be contacted by the owner/developer to determine proper treatment and disposition of the remains. To protect the area in which the Native American human remains are present, development activity shall cease until consultation with the MLD is complete regarding recommendations pursuant to Public Resources Section 5097.98. Discovery of human remains shall also follow CEQA Guidelines Section 15064.5; Public Resources Section 7050.5 and Public Resources Section 5097.98.

MM TCR-4 Prior to the commencement of any grading and/or construction activity, the owner/developer shall retain a Native American Monitor (Tribal Monitor) and a copy of the executed contract shall be submitted to the City of Anaheim Planning and Building Department. The Tribal Monitor shall only be present on-site during the construction phases that involve ground-disturbing activities within undisturbed native sediments. Ground-disturbing activities may include, but are not limited to, demolition of existing structures, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the project site. The Tribal Monitor shall complete daily monitoring logs that shall provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the project site grading and excavation activities are completed, or when the Tribal Representatives and Tribal Monitor have indicated that the project site has a low potential for impacting archaeological or Tribal Cultural Resources (TCRs).

Upon discovery of any archaeological or TCRs, construction activities shall cease in the immediate vicinity of the find until the find can be assessed. All archaeological and/or TCRs unearthed by project construction activities shall be evaluated by the qualified Archaeologist and Tribal Monitor. If the resources are Native American in origin, the Tribal Representative shall coordinate with the owner/developer regarding treatment and curation of these resources. Typically, the Tribe shall request reburial or preservation for educational purposes. Work may continue on other parts of the project site while evaluation and, if necessary, mitigation takes place (CEQA Guidelines SS 15064.5(f)). If a resource is determined by the qualified Archaeologist to

constitute a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County, the Copper Center, or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.

In the event that human remains are uncovered during ground-disturbing activities, the project developer shall cease ground-disturbing activities and contact the County Coroner, Tribal Monitor, and Archaeologist to inform of the discovery. The project developer shall coordinate and consult with the County Coroner, Tribal Monitor, and Archaeologist for advisory on the matter, protocol, and any applicable mitigating requirements. Additionally, If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as the Native American Heritage Commission (NAHC) shall be contacted by the project developer to determine proper treatment and disposition of the remains. To protect the area in which the Native American human remains are present, development activity shall cease until consultation with the MLD is complete regarding recommendations pursuant to Public Resources Section 5097.98. Discovery of human remains shall also follow CEQA Guidelines Section 15064.5; Public Resources Section 7050.5 and Public Resources Section 5097.98**.**

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

Environmental Evaluation

Setting

A significant energy use impact would occur if the proposed project would result in the wasteful, inefficient, and unnecessary consumption of energy during construction or operational activities. The proposed project would be determined to conflict with or obstruct a State or local plan for renewable energy or energy efficiency if construction and operation of the buildings and appliances would not adhere to the energy use reduction measures included in the California Green Building Code or required by the City of Anaheim. This analysis is partly based on the *Air Quality, Energy, and Greenhouse Gas Emissions Impact Analysis West Broadway Townhomes Project,* Vista Environmental, March 4, 2022, included in Appendix A.

Would the project:

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

Less than significant impact. A significant impact would occur if the proposed project would result in the wasteful, inefficient, or unnecessary use of energy.

The proposed project would impact energy resources during construction and operation. Energy resources that would be potentially impacted include electricity, natural gas, and petroleum-based fuel supplies and distribution systems. This analysis includes a discussion of the potential energy impacts of the proposed project, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. A general definition of each of these energy resources are provided below.

Electricity, a consumptive utility, is a man-made resource. The production of electricity requires the consumption or conversion of energy resources, including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources, into energy. The delivery of electricity involves a number of system components, including substations and transformers that lower transmission line power

(voltage) to a level appropriate for on-site distribution and use. The electricity generated is distributed through a network of transmission and distribution lines commonly called a power grid. Conveyance of electricity through transmission lines is typically responsive to market demands. In 2019, the City of Anaheim Public Utilities provided 2,085.89 Gigawatt-hours per year of electricity to the City.[23]

Natural gas is a combustible mixture of simple hydrocarbon compounds (primarily methane) that is used as a fuel source. Natural gas consumed in California is obtained from naturally occurring reservoirs, mainly located outside the State, and delivered through high-pressure transmission pipelines. The natural gas transportation system is a nationwide network and, therefore, resource availability is typically not an issue. Natural gas satisfies almost one-third of the State's total energy requirements and is used in electricity generation, space heating, cooking, water heating, industrial processes, and as a transportation fuel. Natural gas is measured in terms of cubic feet. In 2020, Orange County consumed 594.63 million therms of natural gas.[24]

Petroleum-based fuels currently account for a majority of the California's transportation energy sources and primarily consist of diesel and gasoline types of fuels. However, the State has been working on developing strategies to reduce petroleum use. Over the last decade California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHG emissions from the transportation sector, and reduce VMT. Accordingly, petroleum-based fuel consumption in California has declined. In 2017, 1,382 million gallons of gasoline and 61 million gallons of diesel was sold in Orange County.[25]

The following section calculates the potential energy consumption associated with the construction and operations of the proposed project and provides a determination if any energy utilized by the proposed project is wasteful, inefficient, or unnecessary consumption of energy resources.

Construction Energy

The construction activities for the proposed project are anticipated to include demolition of the three existing office buildings and associated driveways and parking lots on the project site; site preparation and grading of the 1.55-acre project site; construction of the townhomes; paving of the on-site roads and parking areas, sidewalks, and hardscapes; and application of architectural coatings. The proposed project would consume energy resources during construction in three general forms:

- Petroleum-based fuels used to power off-road construction vehicles and equipment on the project site, construction worker travel to and from the project site, as well as delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities);

[23] California Energy Commission. 2016. Electricity Consumption by Entity. Website: http://www.ecdms.energy.ca.gov/elecbyutil.aspx. Accessed March 16, 2022.
[24] California Energy Commission. 2016. Gas Consumption by County. Website: http://www.ecdms.energy.ca.gov/gasbycounty.aspx. Accessed March 16, 2022.
[25] California Energy Commission. 2019. Gasoline Listing. Website: https://ww2.energy.ca.gov/almanac/transportation_data/gasoline/. Accessed March 16, 2022.

- Electricity associated with the conveyance of water that would be used during project construction for dust control (supply and conveyance) and electricity to power any necessary lighting during construction, electronic equipment, or other construction activities necessitating electrical power; and,
- Energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Construction-Related Electricity

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

Since the project site already has electrical service, it is anticipated that only nominal improvements would be required to Anaheim Public Utilities distribution lines and equipment with development of the proposed project. Where feasible, the new service installations and connections would be scheduled and implemented in a manner that would not result in electrical service interruptions to other properties. Compliance with City's guidelines and requirements would ensure that the proposed project fulfills its responsibilities relative to infrastructure installation, coordinates any electrical infrastructure removals or relocations, and limits any impacts associated with demolition, grading, construction, and development. Construction of the project's electrical infrastructure is not anticipated to adversely affect the electrical infrastructure serving the surrounding uses or utility system capacity.

Construction-Related Natural Gas

Construction of the proposed project typically would not involve the consumption of natural gas. Natural gas would not be supplied to support construction activities, thus there would be no demand generated by construction. Since the project site is adjacent to roads that currently have natural gas lines, construction of the proposed project would be limited to installation of new natural gas connections within the project site. Development of the proposed project would likely not require extensive infrastructure improvements to serve the project site. Construction-related energy usage impacts associated with the installation of natural gas connections are expected to be confined to trenching in order to place the lines below surface. In addition, prior to ground

disturbance, the proposed project would notify and coordinate with SoCalGas to identify the locations and depth of all existing gas lines and avoid disruption of gas service. Therefore, construction-related impacts to natural gas supply and infrastructure would be less than significant.

Construction-Related Petroleum Fuel Use

Petroleum-based fuel usage represents the highest amount of transportation energy potentially consumed during construction, which would be utilized by both off-road equipment operating on the project site and on-road automobiles transporting workers to and from the project site and on-road trucks transporting equipment and supplies to the project site.

The off-road construction equipment fuel usage was calculated through use of the off-road equipment assumptions and fuel use assumptions shown in Appendix A, Section 8.2, Energy Use Calculations, which found that the off-road equipment utilized during construction of the proposed project would consume 32,033 gallons of fuel. The on-road construction trips fuel usage was calculated through use of the construction vehicle trip assumptions and fuel use assumptions shown in Appendix A, Section 8.2, Energy Use Calculations, which found that the on-road trips generated from construction of the proposed project would consume 7,875 gallons of fuel. As such, the combined fuel used from off-road construction equipment and on-road construction trips for the proposed project would result in the consumption of 39,908 gallons of petroleum fuel. This equates to 0.003 percent of the gasoline and diesel consumed annually in Orange County. As such, the construction-related petroleum use would be nominal when compared to current countywide petroleum usage rates.

Construction activities associated with the proposed project would be required to adhere to all State and SCAQMD regulations for off-road equipment and on-road trucks, which provide minimum fuel efficiency standards. As such, construction activities for the proposed project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources. Impacts regarding transportation energy would be less than significant. Development of the project would not result in the need to manufacture construction materials or create new building material facilities specifically to supply the proposed project. It is difficult to measure the energy used in the production of construction materials such as asphalt, steel, and concrete; however, it is reasonable to assume that the production of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business.

Operational Energy

The ongoing operation of the proposed project would require the use of energy resources for multiple purposes including, but not limited to heating, ventilating, air conditioning (HVAC), refrigeration, lighting, appliances, and electronics. Energy would also be consumed during operations related to water usage, solid waste disposal, landscape equipment and vehicle trips.

Operations-Related Electricity

Operation of the proposed project would result in consumption of electricity at the project site. As detailed in Appendix A, Section 8.2, Energy Use Calculations, the proposed project would consume 58,953 kilowatt-hours (kWh) per year of electricity. This equates to 0.0028 percent of the electricity

consumed annually by Anaheim Public Utilities. As such, the operations-related electricity use would be nominal when compared to current electricity usage rates in the City.

It should be noted that the proposed project would be required to meet the 2019 Title 24, Part 6 building energy efficiency standards that have been developed to meet the State's goal of zero net energy use for new homes. The zero net energy use would be achieved through a variety of measures to make new homes more energy efficient and by also requiring installation of photovoltaic (PV) systems of adequate size to generate enough electricity to meet the zero-net energy use standard. The size of the PV system required for the project pursuant to the 2019 Title 24 standards was calculated above in Section 8.1, CalEEMod Model Input Parameters, which found that the proposed project would need to install at least 43.3 kilowatts (kW) of PV panels within the proposed project. Although, the CalEEMod model found that with implementation of the 2019 Title 24 Part 6 standards, that the proposed project would continue to utilize a nominal amount of power, it should be noted that the electricity usage and emission rates utilized by the CalEEMod model are based on regional average usage rates for existing homes, which were not all built to the most current Title 24 Part 6, standards, so the CalEEMod model provides a conservative or worst-case analysis of electricity use from the proposed project. Therefore, it is anticipated the proposed project would be designed and built to minimize electricity use and that existing and planned electricity capacity and electricity supplies would be sufficient to support the proposed project's electricity demand. Thus, impacts with regard to electrical supply and infrastructure capacity would be less than significant and no mitigation measures would be required.

Operations-Related Natural Gas

Operation of the proposed project would result in increased consumption of natural gas at the project site. As detailed in Appendix A, Section 8.2, Energy Use Calculations, the proposed project would consume 561 kilo-British Thermal Unit (kBTU) per year of natural gas. This equates to 0.0009 percent of the natural gas consumed annually in Orange County. As such, the operations-related natural gas use would be nominal, when compared to current natural gas usage rates in the County.

It should be noted that the proposed project would comply with all federal, State, and County requirements related to the consumption of natural gas, which includes California Code of Regulations Title 24, Part 6 Building Energy Efficiency Standards and California Code of Regulations Title 24, Part 11: California Green Building Standards Code (CALGreen). California Code of Regulations Title 24, Part 6 and Part 11 standards require numerous energy efficiency measures to be incorporated into the proposed structures, including enhanced insulation as well as use of efficient natural gas appliances and HVAC units. Therefore, it is anticipated the proposed project would be designed and built to minimize natural gas use and that existing and planned natural gas capacity and natural gas supplies would be sufficient to support the proposed project's natural gas demand. Thus, impacts with regard to natural gas supply and infrastructure capacity would be less than significant and no mitigation measures would be required.

Operations-Related Vehicular Petroleum Fuel Usage

Operation of the proposed project would result in increased consumption of petroleum-based fuels related to vehicular travel to and from the project site. As detailed Appendix A, Section 8.2, Energy

Use Calculations, the proposed project would consume 19,159 gallons of petroleum fuel per year from vehicle travel. This equates to 0.0013 percent of the gasoline and diesel consumed in Orange County annually. As such, the operations-related petroleum use would be nominal, when compared to current petroleum usage rates.

It should be noted that, the proposed project would comply with all federal, State, and City requirements related to the consumption of transportation energy that includes CALGreen that require the proposed project to include EV charging spaces on the project site as well as providing preferred Clean Air vehicle parking spaces. The proposed project would also be located next to the existing Euclid-Broadway OCTA bus stop, which would encourage the use of public transportation. Therefore, it is anticipated the proposed project would be designed and built to minimize transportation energy through the promotion of the use of electric-powered vehicles and it is anticipated that existing and planned capacity and supplies of transportation fuels would be sufficient to support the proposed project's demand. Thus, impacts with regard transportation energy supply and infrastructure capacity would be less than significant and no mitigation measures would be required.

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

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

Less than significant impact. The proposed project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. The applicable energy plan for the proposed project is the City of Anaheim General Plan Green Element, adopted May 2004. The proposed project's consistency with the energy conservation policies from the General Plan are shown in Table 7.

Table 7: Proposed Project Compliance with General Plan Energy Conservation Policies

General Plan Policy	Proposed Project Implementation Actions
Continue to maintain and update energy conservation programs and information provided on the City's website.	**Not Applicable.** The policy is only applicable to City Staff for maintain the City's website.
Encourage increased use of passive and active solar design in existing and new development (e.g., orienting buildings to maximize exposure to cooling, effects of prevailing winds and locating landscaping and landscape structures to shade buildings).	**Consistent.** The proposed project would be required to provide a minimum of 43.3 kilowatts (kW) of photovoltaic (PV) solar panels in order to meet the Title 24 Part 6 rooftop solar PV requirements. In addition, the proposed project has been designed to orient buildings to maximize exposure to cooling and the landscape plan has been designed to locate landscaping to shade structures.

General Plan Policy	Proposed Project Implementation Actions
Encourage energy-efficient retrofitting of existing buildings throughout the City.	**Not Applicable.** The proposed project consists of the demolition of the existing structures on the project site and construction of new buildings. No existing structures would remain on-site that could be retrofitted.
Continue to provide free energy audits for the public.	**Not Applicable.** The policy is only applicable for the City as a service that the City provides.
Source: City of Anaheim 2004.	

As shown in Table 7, the proposed project would be consistent with all applicable energy conservation policies from the General Plan. Therefore, the proposed project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Impacts would be less than significant.

Mitigation Measures

None required.

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

Environmental Evaluation

Setting

The analysis in this section is based, in part, on the Geotechnical Investigation prepared by Alta California Geotechnical, Inc. (Alta), on January 4, 2021, included in Appendix D of this document. Alta conducted a subsurface investigation on December 10, 2020, consisting of the excavation, logging and select sampling of four hollow-stem auger borings up to a maximum depth of 31 feet

and the installation of two five-foot-deep wells for infiltration testing. Laboratory testing was performed on bulk and ring samples obtained during the field investigation. Based on Alta's findings during the subsurface investigation, the laboratory test results, and previous experience in the area, it is Alta's opinion that the development of the site is feasible from a geotechnical perspective.

Would the project:

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

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

Less than significant impact. The project site is located in Southern California, which is seismically active. According to the Geotechnical Investigation, the project site is located in the Peninsular Ranges geomorphic province, which characterizes the southwest portion of Southern California where there are major active fault zones. The project site is located in an area that is characterized by a series of parallel, northwest trending faults that exhibit right lateral dip-slip movement.

Several large, active fault systems including the Elsinore-Whittier, Newport-Inglewood, and the San Andreas Fault occur in the region surrounding the site. The nearest known active faults (defined by movement occurring less than 11,700 years ago) are the Puente Hills Fault, located 3.2 miles from the project site; the Newport-Inglewood Fault, located 7 miles from the project site; the Elsinore Fault, located 8 miles from the project site; the San Joaquin Hills Fault, located 9.1 miles from the project site; the San José Fault, located 12.2 miles from the project site; and the Palos Verdes Fault, located 16.1 miles from the project site. The project site is not within an Alquist-Priolo Fault Hazard Zone.[26] The Geotechnical Investigation determined that active faults are not known to exist within the project site, and the site is not within a California State designated earthquake fault zone. Accordingly, the potential for fault surface rupture on the subject site is very low. Therefore, impacts would be less than significant.

ii) Strong seismic ground shaking?

Less than significant impact. The proposed project could be at risk of strong seismic ground shaking hazards caused by earthquakes along other active regional faults. The 2019 California Building Standards Code (CBC) requires use-modified spectral accelerations and velocities for most structural designs. The proposed project would comply with the seismic design parameters using soil profile types identified in the 2019 CBC, which would minimize the risk of adverse effects from strong seismic ground shaking. Therefore, impacts would be less than significant.

[26] Alta California Geotechnical, Inc. (Alta). 2021. Geotechnical Investigation.

iii) Seismic-related ground failure, including liquefaction?

Less than significant impact. Seismic agitation of relatively loose saturated sands, silty sands, and some silts can result in a buildup of pore pressure. If the pore pressure exceeds the overburden stresses, a temporary quick condition known as liquefaction can occur. Liquefaction effects can manifest in several ways including: (1) loss of bearing; (2) lateral spread; (3) dynamic settlement; and (4) flow failure. Lateral spreading has typically been the most damaging mode of failure.

In general, the more recent that a sediment has been deposited, the more likely it would be susceptible to liquefaction. Other factors that must be considered are groundwater, confining stresses, relative density, and the intensity and duration of seismically-induced ground shaking.

Groundwater was not encountered during Alta's subsurface investigation to a depth of 31 feet below ground surface (BGS). The seismic hazard zone report for the area indicates that historic high groundwater elevation is greater than 50 feet below the existing ground surface. The site is not located in a liquefaction zone per the seismic hazard map. Based on the depth to groundwater, the Geotechnical Investigation concluded that the potential for liquefaction to occur on-site is considered minimal. Therefore, impacts would be less than significant.

iv) Landslides?

Less than significant impact. According to the Safety Element of the General Plan, landslides have occurred in the steep slopes of the Hill and Canyon area.[27] Figure S-2 of the General Plan, which shows area of landslide potential, indicates that the project site is not in an area that has potential for earthquake-induced landslides. Therefore, impacts would be less than significant.

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

Less than significant impact with mitigation incorporated. Grading and construction of the project could expose large amounts of soil and could result in soil erosion if effective erosion control measures are not used. Best Management Practices (BMPs) for erosion control are required under National Pollution Discharge Elimination System (NPDES) regulations pursuant to the federal Clean Water Act (CWA). NPDES requirements for construction projects 1 acre or more in area are set forth in the General Construction Permit issued by the California State Water Resources Control Board (State Water Board Order No. 2009-0009-DWQ). Furthermore, the proposed project's land clearing, grading, and construction activities would be required to comply with SCAQMD Rules 403 and 403.2 regulating fugitive dust emissions, thus minimizing wind erosion from ground-disturbing activities. The Geotechnical Investigation for the project site also provided recommendations for the site, which are provided in Appendix D and incorporated in MM GEO-1. MM GEO-1 would require the applicant to implement the recommendations related to site preparation and grading, which would minimize soil erosion. Therefore, with implementation of the NPDES requirements and MM GEO-1, the proposed project would not generate substantial erosion. Impacts would be less than significant.

[27] City of Anaheim. 2004. City of Anaheim General Plan, Safety Element. Website: https://www.anaheim.net/DocumentCenter/Home/View/2039. Accessed November 19, 2021.

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

Less than significant with mitigation incorporated. Based on the literature review and subsurface investigation conducted as part of the Geotechnical Investigation, the site is underlain by undocumented artificial fill and alluvium. The Geotechnical Investigation determined that the potential for collapse at the project site is minimal and would be minimized with implementation of MM GEO-1, which contains recommendations related to the removal of unsuitable soils.

According to Figure S-2 of the General Plan, which shows areas of liquefaction potential, the project site is not in an area that has potential for liquefaction.[28] Figure S-2 also indicates that the project site is not at an area that is at risk of landslides. Therefore, impacts related to liquefaction and landslides would be less than significant.

Furthermore, the undocumented artificial fill upper portions of young alluvial fan deposits at the project site are considered compressible and unsuitable to support the proposed improvements. Recommended removal depths presented in the Geotechnical Investigation would be implemented pursuant to MM GEO-1. With implementation of the mitigation measures, impacts related to the potential for on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse 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 shrink or swell as the moisture content decreases or increases, which can shift, crack, or break structures built on such soils. According to the Geotechnical Investigation, the samples taken from the project site were tested to determine the potential for expansion on the project site. Based on the results, it is anticipated that the majority of materials on-site are “very low” to “low” in expansion potential. Therefore, impacts would be less than significant.

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

No impact. The proposed project would connect to the existing sewer system operated by the City of Anaheim. Septic tanks or alternative wastewater disposal systems would not be used. Therefore, no impact would occur.

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

Less than significant impact with mitigation incorporated. As part of the cultural resources assessment, a paleontological records search request was submitted to the Natural History Museum

[28] City of Anaheim. 2004. City of Anaheim General Plan, Safety Element. Website: https://www.anaheim.net/DocumentCenter/Home/View/2039. Accessed November 19, 2021.

of Los Angeles County and results were received August 5, 2021, and are included in Appendix C. The paleontological record search for this project focused on the Anaheim quadrangle. Only three invertebrate and one microfossil localities are recorded; no significant paleontological resources have been found in the quadrangle. The results indicate that the project site and its surrounding 0.5-mile search area are on Holocene deposits. Holocene deposits are too young to be fossiliferous and therefore have no paleontological potential or sensitivity. Thus, project-related excavations are not expected to disturb any older deposits. However, it is possible that potentially significant prehistoric remains could be found on the project site since buried fossils often go undetected during a walkover survey. Because the potential for paleontological resources exists within the project site and has not yet been examined, MM GEO-2, which provides precautions for incidental findings of paleontological resources on-site, is required. Impacts would be less than significant with mitigation incorporated.

Mitigation Measures

MM GEO-1 The owner/developer would be required to implement the recommendations provided on Page 14 through Page 32 in the Geotechnical Investigation prepared by Alta California Geotechnical, Inc. (Alta), on January 4, 2021. The Geotechnical recommendations that are explained in detail on Page 14 through Page 32 of the Geotechnical Investigation shall be implemented. These include general earthwork requirements for site preparation, removal of unsuitable soils, over-excavation of building pads, compaction standards, groundwater and seepage, documentation, treatment of removal bottoms, fill placement, moisture content, mixing, import soils, utility trenches, back-cut stability, stormwater infiltration systems, and boundary conditions. Additionally, these include requirements related to structural design, foundation design, foundation systems, slabs, moisture barriers, seismic design, walls, footing excavations, slabs and walkways, concrete design, corrosion, pavement design, as well as lot maintenance, and future plan reviews. The Geotechnical Investigation included in Appendix D is incorporated herein by reference as fully set forth in this mitigation measure.

MM GEO-2 If it is determined that fossil-bearing sediments are present on-site, a qualified Monitor shall be required to be present during any ground-disturbing activities during the project. In the event that fossils or fossil-bearing deposits are discovered during construction activities, excavations within a 100-foot radius of the find shall be temporarily halted or diverted, and the owner/developer shall retain a qualified Paleontologist to examine the discovery. The Paleontologist shall document the discovery in accordance with Society of Vertebrate Paleontology standards. The Paleontologist shall determine procedures that would be followed before construction activities are allowed to resume at the location of the find. If the owner/developer determines that avoidance is not feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of construction activities on the discovery. The plan shall be submitted to the City of Anaheim for review and approval prior to implementation, and the owner/developer shall adhere to the recommendations in the plan.

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

Environmental Evaluation

Setting

This analysis is partly based on the *Air Quality, Energy, and Greenhouse Gas Emissions Impact Analysis West Broadway Townhomes Project,* Vista Environmental, March 4, 2022, included in Appendix A.

Gases that trap heat in the atmosphere are referred to as GHGs. The effect is analogous to the way a greenhouse retains heat. Common GHGs include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFC), perfluorocarbons (PFC), and sulfur hexafluoride (SF_6). There have been significant legislative and regulatory activities that directly and indirectly affect climate change and GHGs in California. The primary climate change legislation in California is AB 32, the California Global Warming Solutions Act of 2006, focusing on reducing GHG emissions in California. The proposed project would generate a variety of GHG emissions during construction and operation, including several defined by AB 32, such as CO_2, CH_4, and N_2O.

To describe how much global warming a given type and amount of GHG may cause, the carbon dioxide equivalent (CO_2e) is used. The calculation of the CO_2e is a consistent methodology for comparing GHG emissions since it normalizes various GHG emissions to a consistent reference gas, CO_2. For example, CH_4's warming potential of 25 indicates that CH_4 has 25 times greater warming effect than CO_2 on a molecule-per-molecule basis. A CO_2e is the mass emissions of an individual GHG multiplied by its global warming potential.

SCAQMD GHG Thresholds

The project site is located within the City of Anaheim and is within the SoCAB, which is under the jurisdiction of the SCAQMD. The SCAQMD formed a working group in 2008 to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the SoCAB. The working group developed several different options that are contained in the SCAQMD Draft Guidance Document—Interim CEQA GHG Significance Threshold (Interim GHG Thresholds) that could be applied by lead agencies. The working group has not provided additional guidance since

release of the interim guidance in 2008. The SCAQMD Board has not approved the thresholds; however, the Guidance Document provides substantial evidence supporting the approaches to significance of GHG emissions that can be considered by the lead agency in adopting its own thresholds. The current interim thresholds consist of the following tiered approach:

- Tier 1 consists of evaluating whether or not a project qualifies for any applicable exemption under CEQA.
- Tier 2 consists of determining whether a project is consistent with a GHG Reduction Plan. If a project is consistent with a qualifying local GHG Reduction Plan, it does not have significant GHG emissions.
- Tier 3 consists of screening values, which the lead agency can choose, but must be consistent with all projects within its jurisdiction. A project's construction emissions are averaged over 30 years and are added to the project's operational emissions. If a project's emissions are below one of the following screening thresholds, a project's impacts are considered less than significant:
  - All land use types: 3,000 metric tons (MT) CO_2e per year.
  - Based on land use type: residential: 3,500 MT CO_2e per year; commercial: 1,400 MT CO2e per year; or mixed use: 3,000 MT CO_2e per year.
- Tier 4 has the following options:
  - Option 1: Reduce business-as-usual (BAU) emissions by a certain percentage; this percentage is currently undefined.
  - Option 2: Early implementation of applicable AB 32 Scoping Plan measures.
  - Option 3: 2020 target for service population (SP), which includes residents and employees: 4.8 MT CO_2e/SP/year for projects and 6.6 MT CO_2e/SP/year for plans.
  - Option 3: 2035 target of 3.0 MT CO_2e/SP/year for projects and 4.1 MT CO_2e/SP/year for plans.
- Tier 5 involves mitigation offsets to achieve target significance threshold.

The SCAQMD provided substantial evidence in support of its threshold approach. The SCAQMD discusses its draft thresholds in the following excerpt:[29]

> The overarching policy objective with regard to establishing a GHG significance threshold for the purposes of analyzing GHG impacts pursuant to CEQA is to establish a performance standard or target GHG reduction objective that will ultimately contribute to reducing GHG emissions to stabilize climate change. Full implementation of the Governor's Executive Order S-3-05 would reduce GHG emissions 80 percent below 1990 levels or 90 percent below current levels by 2050. It is anticipated that achieving the Executive Order's objective would contribute to worldwide efforts to cap GHG concentrations at 450 parts per million (ppm), thus stabilizing global climate.

[29] South Coast Air Quality Management District (SCAQMD) 2008. Interim CEQA Greenhouse Gas (GHG) Significance Threshold. October. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf. Accessed March 17, 2022.

> As described below, staff's recommended interim GHG significance threshold proposal uses a tiered approach to determining significance. Tier 3, which is expected to be the primary tier by which the AQMD will determine significance for projects where it is the lead agency, uses the Executive Order S-3-05 goal as the basis for deriving the screening level. Specifically, the Tier 3 screening level for stationary sources is based on an emission capture rate of 90 percent for all new or modified projects. A 90 percent emission capture rate means that 90 percent of total emissions from all new or modified stationary source projects would be subject to some type of CEQA analysis, including a negative declaration, a mitigated negative declaration, or an environmental impact.

In summary, the SCAQMD's draft threshold uses the Executive Order S-3-05 goal as the basis for the Tier 3 screening level. Achieving the Executive Order's objective would contribute to worldwide efforts to cap CO_2 concentrations at 450 ppm, thus stabilizing global climate. In 2010, the SCAQMD Tier 3 threshold was expanded to include non-industrial projects, as explained in the minutes from the most recent working group meeting.[30]

To determine whether the proposed project would have a significant impact with respect to the generation of GHG emissions, this analysis utilizes the SCAQMD's draft local agency Tier 3 threshold of 3,000 MT CO_2e per year for al projects.

The City of Anaheim has not adopted a Climate Action Plan or GHG reduction strategy that would be applicable to the proposed project; therefore, the second CEQA Checklist question (Criterion b) is evaluated by assessing the proposed project for its consistency with the ARB's adopted Scoping Plan and with the ARB's 2017 Climate Change Scoping Plan Update.

Would the project:

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

Less than significant impacts. The proposed project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, and would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing GHG emissions. The proposed project would consist of a residential development with 34 townhomes. The proposed project is anticipated to generate GHG emissions from area sources, energy usage, mobile sources, waste disposal, water usage, and construction equipment.

The City of Anaheim has adopted the Greenhouse Gas Reduction Plan, July 2015, that details measures for the City that includes new development within the City to implement in order to meet the State's 2030 GHG emission reduction target of 40 percent below 1990 baseline levels. In order to show consistency with the GHG Reduction Plan, quantification of the proposed project's GHG emissions is not required. As such, the proposed project's GHG emissions have been provided for

[30] South Coast Air Quality Management District (SCAQMD). 2010. Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #15. September 28. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf. Accessed March 17, 2022.

informational purposes only. The project's GHG emissions have been calculated with the CalEEMod model based on the construction and operational parameters detailed in Appendix A, Section 8.1, CalEEMod Model Input Parameters. A summary of the results is shown below in Table 8, and the CalEEMod model run is provided in Appendix A.

Table 8: Project-Related Greenhouse Gas Annual Emissions

Category	Greenhouse Gas Emissions (Metric Tons per Year)			
	CO_2	CH_4	N_3O	CO_2e
Area	0.57	<0.00	<0.00	0.59
Energy	71.22	<0.00	<0.00	71.46
Mobile	169.46	0.01	0.01	17.93
Solid Waste	1.59	0.09	<0.00	3.93
Water and Wastewater	26.91	0.06	<0.00	28.81
Construction	12.50	0.17	<0.00	12.61
Total GHG Emissions	**282.25**	**0.17**	**0.01**	**289.32**
			SCAQMD Draft Threshold of Significance	**3,000**

Notes:
CH_4 = methane
CO_2 = carbon dioxide
CO_2e = carbon dioxide equivalent
GHG = greenhouse gas
N_3O = nitrous oxide
SCAQMD = South Coast Air Quality Management District
Sources: CalEEMod Version 2020.4.0.

The data provided in Table 8 shows that the proposed project would create 289.32 MT CO_2e per year. For reference purposes Table 8 also shows, the SCAQMD's draft threshold of 3,000 MT CO_2e, which the proposed project would be within this threshold. In addition, as detailed below in Impact 2.8(b), the proposed project would be consistent with the applicable measures in the GHG Reduction Plan. Therefore, a less than significant generation of GHG would occur from development of the proposed project. Impacts would be less than significant

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

Less than significant impact. The proposed project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions. The Anaheim Public Utilities adopted the Greenhouse Gas Reduction Plan (GHG Reduction Plan), July 2015. The GHG Reduction Plan was prepared to assist the City's power supplies in conforming to the GHG emissions reductions as mandated under AB 32. The GHG Reduction Plan provides a utilities GHG emission reduction targets of 20 percent below 1990 levels by the year 2020 and a 40 percent below 1990 levels by 2030. The Plan provides reduction targets for energy usage, PV rooftop installations, and use of EVs.

For energy usage, the GHG Reduction Plan provides a target of a 15 percent reduction by 2020 and a 30 percent reduction by 2030 of the energy utilized by homes in the City of Anaheim. This target would be met through application of State regulations including California Code of Regulations Title 24, Part 6. The 2019 Title 24 Building Standards went into effect on January 1, 2020, and are required to be met for the proposed project's structures. Homes built with the 2019 Standards will use about 7 percent less energy than the current 2016 Standards. It should also be noted that the 2016 Title 24 Standards included new energy efficiency requirements that resulted in new homes being 15 percent more efficient than the 2013 Title 24 Part 6 Standards that were in effect at the time of the preparation of the GHG Reduction Plan. Therefore, through implementation of the State regulations the proposed project would meet the energy use reduction targets provided in the GHG Reduction Plan.

For PV rooftop installations, the GHG Reduction Plan provides a target of 27,000 kW of PV systems installed by 2020 and 37,000 kW of PV systems installed by 2030. This target would be met through application of State regulations including Title 24, Part 6 that requires the proposed project to install a minimum of 43.3 kilowatts of photovoltaic solar panels onto the proposed townhomes. Therefore, through implementation of the State regulations the proposed project would assist the City in meeting the PV rooftop installation targets provided in the GHG Reduction Plan.

For EV, the GHG Reduction Plan provides a target of 2,000 low- or Zero-Emission Vehicles (ZEV) by 2020 and 5,000 low- or ZEVs by 2030. As detailed on the site plan for the proposed project, the proposed project would provide at least one EV charging station. Therefore, development of the proposed project would assist the City in meeting the EV usage targets provided in the GHG Reduction Plan.

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

Mitigation Measures

None required.

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

Environmental Evaluation

Setting

The analysis in this section is based, in part, on the Phase I Environmental Site Assessment (Phase I ESA) and Phase II ESA prepared by Stantec Consulting Services, Inc. (Stantec), on October 23, 2020, included as Appendix E of this document. Based on historical documents, the project site was formerly used for agricultural purposes until the early 1960s. Therefore, the historical use of the project site for agricultural purposes can be a potential environmental concern due to the possible use of pesticides and herbicides containing heavy metals used to prohibit the growth of weeds. Accordingly, Stantec advanced six shallow borings to 3 feet BGS on October 8, 2020, to collect soil

samples for chemical analysis to determine whether pesticides and heavy metals associated with herbicides were present at levels that represent a Recognized Environmental Condition (REC) or that are of concern to residential development. Soil samples were collected at the 0.5-1.0-foot interval, 1.5-2.0-feet interval, and the 2.5-3.0-feet interval. The shallow soil sample (0.5-1.0-foot) from the borings were analyzed for organochlorines pesticides (OCPs) by United States Environmental Protection Agency (EPA) test method 8081A and the metals arsenic and lead by EPA test method 6010B.

Would the project:

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

Less than significant impact. Construction of the proposed project would include the transport, use, and disposal of limited quantities of hazardous materials necessary for construction, including fuel and solvents. The use of these hazardous materials would be short-term and would be handled in accordance with standard construction practices, as well as with applicable federal, State, and local regulations. The primary regulatory requirements include SCAQMD Rule 1166 volatile organic compound emissions) and Rule 1466 (fugitive dust-toxic air contaminants). The proposed project would include residential development that would not involve hazardous materials, substances, or waste during operation of the proposed project. The proposed project could involve the use of materials associated with routine maintenance of the project site, such as cleaning and landscaping. These uses would not involve the routine transport, use, or disposal of quantities of hazardous materials that could create a significant hazard to the public or environment. These hazardous materials would be stored, handled, and disposed of in accordance with applicable regulations. Thus, the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials with compliance with the regulatory requirements. Therefore, impacts would be less than significant, and no mitigation is required.

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

Less than significant with mitigation incorporated. As discussed above, the Phase I ESA and Phase II ESA determined that the project site was previously used for agricultural purposes until the 1960s. Therefore, Stantec identified the possible use of pesticides as a potential REC and collected soil samples for testing. Only one detection of OCPs was detected in one soil sample; however, it was below the EPA Regional Screening Level (RSL) and the California Department of Toxic Substances Control (DTSC) residential screening level. No additional OCPs were detected in any of the soil samples. Lead was detected in all six soil samples; however, all of the detections were well below the DTSC residential screening level for lead. Additionally, arsenic was detected in all six soil samples, which are above the EPA RSL for residential use, but within the Southern California regional background levels for arsenic. Based on these results, historical agricultural use does not represent a REC or a human health risk in contemplation of the proposed project. Additionally, as discussed in the Phase I ESA and Phase II ESA, environmental records search conducted for the proposed project identified no RECs, HRECs or de minimis conditions at or near the project site.

Given the ages of the existing buildings on the project site (circa 1960s), the Phase I ESA and Phase II ESA identified the presence of asbestos-containing materials (ACMs) and lead-based paint (LBP) as probable. Therefore, as detailed in MM HAZ-1, a comprehensive, pre-demolition ACM survey in accordance with the sampling protocol of the Asbestos Hazard Emergency Response Act (AHERA) would be conducted prior to any activities with the potential to disturb building materials, in order to determine whether ACM are present. Further, in the event ACM is detected, proper removal and disposal of the materials identified would occur prior to any demolition. In addition, any LBP at the project site would be removed in accordance with all applicable laws, including Occupational Safety and Health Administration (OSHA) guidelines. As such, impacts would be less than significant with the implementation of MM HAZ-1.

As discussed in Impact 2.9(a), federal, State, and local laws, regulations address the storage, use, handling, and disposal of any hazardous materials that might be used during construction. Compliance with applicable laws and regulations would reduce the risk of hazardous material incidents during construction to a less than significant level. Therefore, project construction activities would not create a significant hazard to the public or to the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

During operation, the proposed project would not generate or facilitate the generation of hazardous materials. The proposed project could involve the transport and use of materials associated with routine maintenance of the project site, however, the types and quantities of materials used and stored on-site would not be of a significant quantity to create a reasonably foreseeable upset or accident. Therefore, operation of the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant, and no mitigation is required for operations of the proposed project.

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

Less than significant impact. The proposed project would be located at 1661 to 1673 West Broadway, in the City of Anaheim. The nearest schools to the project site would be the Montessori Education Center (1658 West Broadway), approximately 300 feet across the street from the project site, and Loara Elementary School (1601 West Broadway), approximately 0.15 mile east of the project site. As discussed in Impact 2.9(a), construction of the proposed project would include limited use of hazardous materials, such as fuel and solvents, to operate construction activity. However, use of these hazardous materials would be in compliance with all applicable local, State, and federal regulations. During operation of the proposed project, limited use of hazardous materials would likely be used for building maintenance. Similarly, these hazardous materials would be stored, handled, and disposed of in accordance with applicable regulations. Thus, the proposed project does not propose any uses, which could potentially generate hazardous materials in significant quantities that would have an impact to surrounding schools. Therefore, the schools in close proximity to the project site would not be affected by hazardous emission or materials. Impacts would be less than significant, and no mitigation is necessary.

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

Less than significant impact. Government Code Section 65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List, maintained by the DTSC. The Cortese List contains hazardous waste and substance sites as well as hazardous substance sites selected for remedial action; historic Cortese sites; and sites with known toxic material identified through the abandoned site assessment program. The proposed project would not be located on a site which is included on a hazardous materials site list compiled pursuant to California Government Code Section 65962.5. The closest sites recognized by the Cortese List are approximately 0.25 mile north of the project site are an active Voluntary Cleanup site located at 1687 West Lincoln Avenue and the After 5 Tux Shop, which is classified as a State Response site and is being further evaluated by DTSC for site cleanup.[31] None of the activities occurring at these sites would be close enough to the project site to have an impact. Therefore, the proposed project would not create a significant hazard to the public or the environment. No impact would occur, and not mitigation is required.

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

No impact. The proposed project would be located at 1661 to 1673 West Broadway, in the City of Anaheim. The nearest airports to the project site would be Fullerton Municipal Airport, approximately 3.6 miles northwest of the project site, the Joint Forces Training Base Los Alamitos, approximately 7 miles southwest of the project site, and the Long Beach Airport, approximately 12 miles west of the project site. The project site is not within the Airport Influence Areas of these two airports and is not located within an airport land use plan. Therefore, the proposed project would not result in a safety hazard or excessive noise for people working or residing at the project site. No impact would occur, and no mitigation is required

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

Less than significant impact. The City's Emergency Operations Plan (EOP), adopted in 2017, establishes a comprehensive framework of policy and guidance for emergency and disaster response operations.[32] The EOP provides comprehensive policy and guidance for emergency and response operations, and details the responsibilities of residents, organizations, and City-departments. The City uses Anaheim Alert to contact residents immediately during emergencies to provide information regarding evacuations. However, the EOP does not contain specific evacuation routes. During construction of the proposed project, construction activities would not require the complete closure of West Broadway or any other public or private streets and would be temporary in nature. Thus, construction of the proposed project would not impede the use surrounding roadways for

[31] California Department of Toxic Substances Control (DTSC). 2022. Envirostor Hazardous Waste and Substances Site List Map. Accessed January 14, 2022. Available: https://www.envirostor.dtsc.ca.gov/public/map/?global_id=15280010.

[32] City of Anaheim. 2017. Emergency Operation Plan. Accessed January 17, 2022. Available: https://www.anaheim.net/DocumentCenter/View/21657/City-of-Anaheim-EOP-2017.

emergencies or access for emergency response vehicles. Operation of the proposed project would not interfere with roadways and would provide internal circulation for emergency vehicle access. Therefore, the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Thus, impacts would be less than significant, and no mitigation is required.

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

No impact. CAL FIRE has mapped fire threat potential throughout California and ranks fire threats on a scale of no fire threat, moderate, high, and very high fire severity. According to the CAL FIRE Hazard Severity Zone Map Viewer, the project site is located within a Local Responsibility Area (LRA). Land within an LRA is either located within a Very High Fire Hazard Severity Zone (VHFHSZ) or a non-VHFHSZ. The project site is designated as a non-VHFHSZ. Further, the project site is in a developed, built-up urban area that is not adjacent to any Very High Fire Hazard Zone (VHFHZ) or wildland areas. Therefore, the proposed project would not expose people or structures to a significant risk involving wildland fires. No impact would occur, and no mitigation is required.

Mitigation Measures

MM HAZ-1 The owner/developer shall conduct a comprehensive, pre-demolition asbestos-containing materials (ACM) survey in accordance with the sampling protocol of the Asbestos Hazard Emergency Response Act (AHERA) prior to any activities with the potential to disturb building materials, in order to determine whether ACMs are present. The owner/developer shall submit the ACM survey to the City prior to issuance of a demolition permit. In the event that ACMs are detected, the proper removal and disposal, consistent with existing regulations, of the building materials would occur prior to any activities with the potential to disturb them.

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

Environmental Evaluation

Setting

The analysis in this section is based, in part, on the Preliminary Hydrology Study and the Preliminary Water Quality Management Plan for the proposed project prepared by C & V Consulting, Inc., in July 2021, included in Appendix F of this document. Presently, the project site contains approximately 88 percent impervious coverage. Drainage at the project site generally flows in the southern direction toward the West Broadway right-of-way. Stormwater entering West Broadway continues to flow west through catch basins and into an existing City of Anaheim public 42-inch reinforced concrete

storm drainpipe. This drainage facility conveys runoff west to the Carbon Creek Channel at South Dale Avenue. The Carbon Creek Channel eventually confluences with the San Gabriel River and ultimately outlets into the Pacific Ocean at San Pedro Bay.

Would the project:

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

Less than significant impact with mitigation incorporated. The proposed project would include the development of 34 attached, multi-family townhomes with associated resident and guest parking areas and recreational areas. Construction of the proposed project would include the demolition of existing buildings at the project site and grading. The project site would be graded to convey stormwater as surface flow to one proposed curb inlet catch basin near the southern property line of the site on W Broadway. The proposed catch basin would convey low flows to a proposed infiltration system designed to infiltrate the entire Design Capture Volume (DCV), the volume of the stormwater runoff based on design capture storm depth. During storm events that produce a larger runoff volume than the DCV, stormwater could pond in the proposed catch basin and into a proposed storm drainpipe that would convey the overflow into a junction structure and then into the existing 42-inch public storm drainpipe in West Broadway. Emergency (secondary) overflow could pond around the proposed catch basin and sheet flow into the right-of-way of Broadway over the proposed driveway. Upon entering the public storm drain, site runoff would follow the historic drainage pattern and drain to Carbon Creek Channel.

During construction, impacts to water quality could occur during demolition and grading when erosion could occur. As discussed under Section 3.8, Geology and Soils, construction of the proposed project could expose large amounts of soil and could result in soil erosion. The proposed project would be subject to the General Construction Permit, NPDES requirements, and the requirements contained within the Orange County Drainage Area Management Plan (DAMP), which require the use of BMPs to reduce the project's impact on water quality. The DAMP contains guidelines on structural and nonstructural BMPs for meeting the NPDES goals, and the General Construction Permit requires the project to prepare a Storm Water Pollution Prevention Plan (SWPPP), which is required to include erosion control BMPs. BMPs include erosion controls, sediment controls, wind erosion controls, tracking controls, non-stormwater management, and waste and materials management. Further, the proposed project would comply with MM GEO-1 requires the applicant to implement the measures related to site preparation and grading contained within the Geotechnical Investigation, which would minimize soil erosion.

The Orange County Flood Control District (OCFCD), the County of Orange, and the City of Anaheim discharge pollutants from their Municipal Separate Storm sewer System (MS4s). The County's Low Impact Development (LID) Ordinance requires projects comply with NPDES MS4 Permit water quality requirements. Thus, all new developments and redevelopments that would have at least one acre of impervious surfaces are required to prepare a Water Quality Management Plan (WQMP), including the proposed project. The Preliminary WQMP for the proposed project is included in Appendix F. Further, the City requires that all significant redevelopment projects, defined as projects that add or replaces 5,000 or more square feet of impervious surfaces, to comply with Orange County's LID requirements.

The proposed project would redevelop the existing project site, which contains approximately 8,125 square feet of pervious surface and approximately 59,579 square feet of impervious surfaces, to develop approximately 67,704 square feet of impervious surfaces. Thus, the proposed project would comply with the County's LID requirements and implement infiltration BMPs to treat the required stormwater runoff volume. Biotreatment BMPs would also be utilized as a form of pre-treatment prior to entering the proposed infiltration systems. The proposed development would utilize one a BioClean Urban Pond system to retain and infiltrate the entire DCV. The Urban Pond system is an underground infiltration gallery with several rectangular modules with an offset 3-legged design with two narrow legs running parallel and one wider leg running perpendicular. The proposed Urban Pond would have an open bottom and would be underlain by a gravel bed for infiltration. In addition, one Modular Wetland System (MWS) Biofiltration vault would be utilized to provide pre-treatment of street runoff prior to entering the infiltration system. The MWS Biofiltration vault utilizes a 3-phase treatment train by collecting the stormwater runoff in a Pre-Treatment Chamber, Planting or "Wetland" Chamber and Discharge Chamber. The proposed project would also include an on-site catch basin, which would be equipped with a Connector Pipe Screen (CPS) device sized for the 1-year 1-hour storm event for the area tributary to the catch basin. The system would be designed to provide enough static volume to retain 100 percent of the DCV, and the gravel bed surface area would provide sufficient surface area infiltrate this entire volume within 48 hours.

Therefore, with implementation of the described BMPs, compliance with the applicable permits and plans, and MM GEO-1, the proposed project would not violate any water quality standards or waste discharge requirements.

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

Less than significant impact. As discussed previously, the proposed project would connect to existing water and sanitary lines on Broadway and would install stormwater drainage systems on-site. According to City's 2020 Urban Water Management Plan (UWMP), the City relies on a combination of imported water, local groundwater, and a small amount of recycled water to meet its water needs. The City works together with two primary agencies, Metropolitan Water District of Southern California (Metropolitan) and Orange County Water District (OCWD) to ensure a reliable water supply that would continue to serve the City in periods of drought and shortage. The City's main source of water supply is groundwater from the Orange County Groundwater Basin (OC Basin). The City has historically relied on approximately 70 percent groundwater (previous 10-year average) and 30 percent imported water from Metropolitan to supply its customers. The City has historically operated 18 active groundwater wells to supply potable water to its customers; however, recently the City has taken 14 wells out of service due to water quality concerns related to contaminants known as polyfluoroalkyl substances (PFAS). The City is implementing a new Groundwater Treatment Program that would allow the City to remove PFAS to acceptable State mandated levels.[33]

[33] City of Anaheim. 2020. Urban Water Management Plan. Available: https://www.anaheim.net/DocumentCenter/View/37199/Anaheim-2020-UWMP?bidId=. Accessed February 16, 2022.

OCWD regulates groundwater levels in the OC Basin by regulating the annual amount of pumping. The regulation is based on establishing the Basin Production Percentage (BPP), the percentage of each producer's total water supply that comes from groundwater pumped from the OC Basin. The BPP is set based on groundwater conditions, availability of imported water supplies, and basin management objectives.[34] The project site is located on the OC Basin. The proposed project would affect groundwater supplies if the basin recharge would be impacted. Typically, basin recharge occurs through either the natural percolation of rainwater through the ground or the artificial recharge that occurs at spreading grounds, modular wetlands, etc., which results in the percolation of that captured water into the ground.

Presently, the existing project site is composed of 12 percent pervious surfaces (approximately 8,125 square feet) and 88 percent impervious surfaces (approximately 59,579 square feet). The proposed project would ultimately result in 100 percent impervious surfaces (approximately 67,704). Thus, the increase in impervious area at the project site would reduce the amount of pervious area available for groundwater recharge through the percolation of rainwater. However, as discussed above, the proposed project would include one BioClean Urban Pond system, one MWS Biofiltration vault, and one on-site catch basin, which would retain and infiltrate stormwater as artificial recharge of groundwater.

Further, as discussed in the UWMP, groundwater levels are managed within a safe basin operating range to protect the long-term sustainability of the OC Basin and to protect against land subsidence. OCWD regulates groundwater levels in the OC Basin by regulating the annual amount of pumping. Thus, the proposed project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the proposed project would impede the basins' sustainable groundwater management. Therefore, impacts would be less than significant, and no mitigation is required.

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

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

Less than significant with mitigation incorporated. As discussed in Impact 2.10(a), the proposed project could result in erosion and siltation during construction demolition and grading. However, the proposed project would comply with the General Construction Permit, NPDES requirements, and DAMP requirements, which require the use of BMPs to reduce the project's impact on water quality. Thus, the proposed project would prepare a SWPPP and implement erosion controls, sediment controls, wind erosion controls, tracking controls, non-stormwater management, and waste and materials management. Further, the proposed project would comply with MM GEO-1 requires the applicant to implement the recommendations related to site preparation and grading contained

[34] City of Anaheim. 2020. Urban Water Management Plan. Available: https://www.anaheim.net/DocumentCenter/View/37199/Anaheim-2020-UWMP?bidId=. Accessed February 16, 2022.

within the Geotechnical Investigation, which would minimize soil erosion. Thus, impacts to erosion and siltation would be less than significant with the implementation of MM GEO-1.

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

Less than significant impacts. According to the City's Master Plan of Storm Drainage for Carbon Creek Channel Tributary Area, the project site is located within Drainage Basin 8. Drainage Basin 8 has a tributary drainage area of approximately 1100 acres consisting of two drainage areas. The project site is located within the Drainage Area 8-1, which is defined by the City to drain into an existing storm drain that conveys runoff to Carbon Creek. Stormwater runoff entering Broadway continues to flow west into an existing City of Anaheim public 42-inch reinforced concrete storm drainpipe that turns into a 90-inch reinforced concrete storm drain pipe slightly east of the intersection of West Broadway and South Gilbert Street. At Magnolia Avenue, runoff continues into a 96-inch reinforced concrete pipe where it eventually enters the Carbon Creek Channel at South Dale Avenue. The Carbon Creek Channel eventually confluences with the San Gabriel River and ultimately outlets into the Pacific Ocean at San Pedro Bay. The storm drain line that runs in Broadway has a capacity of 455 cubic feet per second (cfs) which is equivalent to 45 percent of the 10-year storm event.

As discussed above, the proposed drainage system would collect and convey stormwater runoff to the proposed infiltration system designed to retain and infiltrate the entire DCV within a drawdown time of 48 hours. During larger storm events and when the infiltration system is at capacity, stormwater would overflow within the proposed on-site catch basin and be conveyed off-site via junction structures into the existing public 42-inch storm drain in Broadway. The proposed on-site catch basin would be equipped with a CPS device for certified full capture system requirements and storm drain signage would be implemented. Thus, the proposed project would not contribute to any on or off-site flood, and impacts would be less than significant. No mitigation is required.

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

Less than significant impact. As discussed in Impact 2.10(c)(ii) above, the proposed drainage runoff would be collected by a series of area drains and by a proposed sump curb inlet catch basin within the proposed private drive aisle and conveyed to a BioClean Urban Pond infiltration system designed to retain and infiltrate the entire DCV. Pre-treatment of the roof and street surface runoff DCV would be provided by proposed MWS Biofiltration vault prior to entering the infiltration system. During storm events that produce a runoff volume greater than the DCV, stormwater would overflow within the proposed catch basin and be conveyed off-site through a junction structure to the existing public City 42-inch storm drain in West Broadway. The proposed drainage pattern matches the existing historical drainage pattern from the site. Runoff from this area historically flows in the westerly direction and ultimately enters Carbon Creek Channel which flows in the southeasterly direction toward the Pacific Ocean. Thus, the proposed project would not contribute to runoff that exceeds the stormwater drainage system as it would be designed to accommodate the entire DCV. In fact, the results from this Preliminary Hydrology Study, included in Appendix F, demonstrate that the

proposed project would generate a slightly lower volume to Broadway than the existing condition. Therefore, impacts would be less than significant, and no mitigation is required.

(iv) impede or redirect flood flows?

Less than significant impact. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) 06059C0129J, the project site is located within Zone X, which indicates 0.2 percent annual chance of flood hazards; areas of 1 percent annual chance of flood with average depths less than one foot or with drainage areas of less than 1 square mile.[35] In other words, this designation identifies a low chance of flood hazard and that the project site is not located in a Special Flood Hazard Area. Additionally, the proposed project includes project features that would be designed to accommodate the entire DCV and would generate a slightly lower volume of stormwater to Broadway than the existing condition. Therefore, the proposed project is not in a flood hazard area and would not contribute to flooding on-site. Thus, impacts would be less than significant, and no mitigation is required.

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

Less than significant impact. As described in Impact 2.10(c)(iv) above, the proposed project is not located in a flood hazard area and would have less than significant impacts related to flood hazard. Further, the City's General Plan Dam Inundation Map indicates that the project site it outside the general limits of the flood impact zone associated with Prado Dam failure, Carbon Canyon Dam failure, and Walnut Canyon Reservoir dam failure.

Tsunamis are sea waves that are generated in response to large-magnitude earthquakes. When these waves reach shorelines, they sometimes produce coastal flooding. Seiches are the oscillation of large bodies of standing water, such as lakes, which can occur in response to ground shaking. According to the California Tsunami Hazard Area Map, the project site is located outside a Tsunami Hazard Area.[36] Further, the project site is approximately 10.85 miles from the Pacific Ocean, which is the closest large body of standing water, therefore, the chance of seiche is low. Given this information, the opportunity for project inundation is extremely low, and thus, impacts related to release of pollutants during inundation is less than significant. No mitigation is required.

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

Less than significant impact. The proposed project would develop 34 dwelling units, resulting an estimated 116 new residents. According to the UWMP, the City uses a methodology of 51.1 gallons per capita per day (GPCD) for new development. Therefore, the proposed project would generate a water demand of 5,927.6 gallons per day (GPD) or approximately 6.6 acre-feet per year (AFY).

[35] Federal Emergency Management Agency (FEMA). 2020. National Flood Hazard Layer FIRMette, 06059C0129J. Available: https://msc.fema.gov/arcgis/rest/directories/arcgisjobs/nfhl_print/mscprintb_gpserver/j444eeb2108664ccbb74593a45c5552a3/scratch/FIRMETTE_93b9d572-5338-4a9c-b707-9250f6774b71.pdf. Accessed February 16, 2021.

[36] California Department of Conservation. 2022. California Tsunami Maps and Data. Available: https://www.conservation.ca.gov/cgs/tsunami/maps. Accessed February 16, 2022.

As discussed above in Impact 2.10(b), the City's main source of water supply is groundwater from the OC Basin, which is managed by OCWD. The City does not have its own Groundwater Management Plan; however, the OCWD maintains a Groundwater Management Plan, which was most recently updated in 2015. According to the OCWD Groundwater Management Plan, OCWD regulates groundwater levels in the OC Basin by regulating the annual amount of pumping. The primary mechanism used by OCWD to manage pumping is the BPP. The BPP is a percentage of each producer's water supply that comes from groundwater pumped from the basin. The BPP is set on an annual basis and is uniform for all Producers. Groundwater pumping above the BPP is assessed an additional charge that creates a disincentive for over-producing.

The proposed project is expected to be operational by 2025. According to the UWMP, by 2025 the BPP for the City would be 82 percent. However, the City's 2025 water supply and demand forecast in the UWMP projected the local groundwater supply as the amount needed to meet projected demands after subtracting the available supply from Metropolitan (14,000 AFY) and recycled water supply (120 AFY), rather than using the amount of groundwater available to the City based on the BPP. The City would utilize local groundwater supplies first and supplement with imported water as needed to meet demands. Given this information, water supply from groundwater is expected to be approximately 48,182 AFY in 2025, which is approximately 77 percent of the total water supply for the City, which approximately 62,302 AFY. For the same year, the City's total demand is expected to be 58,878 AFY. The proposed project would create an additional demand of approximately 6.6 AFY, which is approximately 0.01 percent of the total demand. Thus, there is excess groundwater supply available for the City, and the water supply demanded by the proposed project would be negligible. Therefore, impacts would be less than significant, and no mitigation is required.

Mitigation Measures

Implement MM GEO-1.

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

Environmental Evaluation

Setting

Information and analysis for Land Use and Planning impacts are based on the City of Anaheim's General Plan Land Use Element and Anaheim Municipal Code. The proposed project would include the development of 34 attached townhomes on an approximately 1.55-acre project site. The proposed project would include demolition of all the existing buildings and parking areas on-site and the construction of five residential buildings, roadways, sidewalks, and associated improvements. The project site is currently designated for Office–Low land use by the City of Anaheim General Plan Land Use Element and would require a GPA to change the land use to Mid Density Residential. The project site is currently located within the C-G Zone and would be rezoned RM-3.5 as part of the proposed project.

Would the project:

a) Physically divide an established community?

Less than significant impact. The project site is in a highly developed and urbanized area. Surrounding land uses include multi-family residential buildings and religious institutions to the north, south, and east, and a strip mall to the west. Surrounding properties are in the RM-4, C-G, and T zones. The proposed project would meet all development standards of the RM-3.5 zone with approval of a CUP.

The project site is located within an urbanized area in the City Anaheim and is not large enough or otherwise configured in such a way that would create a physical barrier within an established community. A typical example of such a barrier would be a project that involved a continuous right-of-way, such as a roadway, which would divide a community and impede access between parts of the community. Therefore, implementation of the proposed project would not disrupt the surrounding land uses or divide the physical arrangement of the established communities to the north, south, and east of the project site. Therefore, the proposed project would not physically divide an established community, and impacts would be less than significant, and no mitigation is required.

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

Less than significant impact. The proposed project would include a GPA to change the General Plan land use designation from Office–Low to Mid Density Residential and reclassify the property from the C-G Zone to the RM-3.5 Zone. As described above, the land uses to the north, south, and east of the project site are designated by the General Plan for multi-family residential land uses. As such, the proposed GPA would be consistent with the existing surrounding land uses, and with approval of these changes, the proposed project would not conflict with any applicable land use plan, policy, or regulation. Impacts are therefore considered less than significant, and no mitigation is required.

Mitigation Measures

None required.

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

Environmental Evaluation

Setting

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

Would the project:

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

No impact. According to the City of Anaheim General Plan Green Element, mineral resources are located in the northeastern part of the City, especially along the northern side of the Santa Ana River, and are mapped as Mineral Resource Zone 2 (MRZ-2). The General Plan identifies this area as a Regionally Significant Aggregate Resource Area.[37] The MRZ-2 designation represents, "areas where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists." The project site is located in the western portion of the City and is not located in either of these zones; therefore, project implementation would not affect any known mineral deposits. Additionally, the project site is currently zoned C-G and would be rezoned RM-3.5. The C-G Zone and the RM-3.5 Zone do not permit mineral extraction; therefore, project implementation would not result in the loss of availability of a known mineral resource. Thus, no impacts would occur, and no mitigation is required.

[37] City of Anaheim. 2020. Anaheim General Plan Green Element Figure G-3, *Mineral Resource Map*. Website: http://www.anaheim.net/DocumentCenter/View/9521. Accessed August 4, 2021.

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

No impact. The City of Anaheim General Plan currently designates the project site as G-C, and the proposed project would include a rezoning of the site to RM-3.5. These zones do not permit mineral extraction. Furthermore, the project site is in an urbanized area consisting of residential and office uses and does not support mineral extraction operations; therefore, no impacts would occur, and no mitigation is required.

Mitigation Measures

None required.

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

Environmental Evaluation

Setting

The following analysis is based on the Noise Impact Analysis prepared by Vista Environmental, March 14, 2022, and included in its entirety in Appendix A.

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?

Less than significant impact. The proposed project would not generate 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. The following section calculates the potential noise emissions associated with the temporary construction activities and long-term operations of the proposed project and compares the noise levels to the City standards.

Construction-Related Noise

The construction activities for the proposed project are anticipated to include demolition of the three existing office buildings and associated driveways and parking lots on the project site; site preparation and grading of the 1.55-acre project site; construction of the townhomes; paving of the on-site roads and parking areas, sidewalks and hardscapes; and application of architectural coatings.

Noise impacts from construction activities associated with the proposed project would be a function of the noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities. The nearest sensitive receptors to the project site are residents at the multi-family homes located as near as 50 feet north of the project site. There are also multi-family homes located as near as 110 feet south of the project site, and a church located as near as 20 feet east of the project site.

Section 6.70.010 of the City's Municipal Code exempts construction noise that occurs between 7:00 a.m. and 7:00 p.m. from the stationary noise standard of 60 decibels (dB) at the nearby residential property lines. All construction activities associated with the proposed project would occur during the allowable hours for construction activities as detailed in Section 6.70.010 of the Municipal Code. However, the City construction noise standards do not provide any limits to the noise levels that may be created from construction activities and even with adherence to the City standards; the resultant construction noise levels may result in a significant substantial temporary noise increase to the nearby residents.

In order to determine whether the proposed construction activities would create a significant substantial temporary noise increase, the Federal Transit Administration (FTA) construction noise criteria thresholds detailed in Appendix A, Noise Impact Analysis Section 4.1, Federal Regulations, have been utilized, which shows that a significant construction noise impact would occur if construction noise exceeds 80 A-weighted decibel (dBA) equivalent sound level (L_{eq}) over an 8-hour period during the daytime at the nearby homes or exceeds 85 dBA L_{eq} over an 8-hour period during the daytime at the church to the east, which is considered a commercial use. Construction noise impacts to the nearby sensitive receptors have been calculated through use of the Roadway Construction Noise Model (RCNM) and the parameters and assumptions detailed in Appendix A, Noise Impact Analysis Section 6.1, Construction Noise, of this report, including Construction Equipment Noise Emissions and Usage Factors. The results are shown below in Table 9.

Table 9: Construction Noise Levels at Nearby Homes

Construction Phase	Construction Noise Levels (dBA L_{eq}) at:		
	Multi-family Homes to the North[1]	Multi-family Homes to the South[2]	Church to the East[3]
Demolition	73	71	78
Site Preparation	72	70	77
Grading	72	70	77
Building Construction	72	70	77
Paving	0	68	76
Painting	6	59	66
FTA Construction Thresholds[4]	**80**	**80**	**85**
Exceed Threshold?	**No**	**No**	**No**

Construction Phase	Construction Noise Levels (dBA L_{eq}) at:		
	Multi-family Homes to the North[1]	Multi-family Homes to the South[2]	Church to the East[3]

Notes:
FTA = Federal Transit Administration
[1] The multi-family homes to the north are located as near as 220 feet from the center of the project site.
[2] The multi-family homes to the south are located as near as 280 feet from the center of the project site.
[3] The church to the east is located as near as 120 feet from the center of the project site.
[4] FTA Construction Noise Thresholds obtained from Appendix D, Table A above.
Source: Roadway construction Noise Model (RCNM) Federal Highway Administration (FTA) 2006.

Table 9 shows that the greatest noise impacts would occur during the demolition phase, with a noise level as high as 73 dBA L_{eq} at the multi-family homes to the north, 71 dBA L_{eq} at the multi-family homes to the south, and 78 dBA L_{eq} at the church to the east. The calculated construction noise levels shown in Table 9 are within the FTA daytime construction noise standard of 80 dBA at the nearby homes and within the 85 dBA noise standard at the church to the east. Therefore, through adherence to the allowable construction times detailed in Section 6.70.010 of the Municipal Code, the proposed project would not create a substantial temporary increase in ambient noise levels from construction of the proposed project. Impacts would be less than significant.

Operational-Related Noise

The proposed project would consist of a residential development with 34 townhomes. Potential noise impacts associated with the operations of the proposed project would be from project-generated vehicular traffic on the nearby roadways. In addition, the proposed development would be adjacent to Broadway, which may create exterior and interior noise levels in excess of City standards at the proposed townhomes. The noise impacts to the nearby existing homes and proposed townhomes have been analyzed separately below.

Roadway Vehicular Noise Impact to Nearby Homes

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

Policy 3 under Goal 2.I of the General Plan Noise Element requires new development that generates increased traffic and subsequent increases in noise to noise-sensitive land uses to provide appropriate mitigation. However, since the General Plan does not define what increase in roadway noise would be considered significant, the noise increase thresholds detailed in the General Plan EIR has been utilized in this analysis. The General Plan EIR utilized a mobile-source noise threshold of a 5 dBA increase threshold where the Without Project roadway noise levels are below 65 dBA CNEL at the nearest homes; or a 3 dBA increase threshold where the Without Project roadway noise levels are 65 dBA Community Noise Equivalent Level (CNEL) or higher.

The potential off-site traffic noise impacts created by the ongoing operations of the proposed project have been analyzed through utilization of the Federal Highway Administration (FHWA) model and parameters described in Appendix A, Noise Impact Analysis, Section 6.2, Operations-Related Noise, and the FHWA model traffic noise calculation spreadsheets are also provided in Appendix A. The proposed project's potential off-site traffic noise impacts have been analyzed for the existing year and opening year and General Plan Buildout scenarios that are discussed separately below.

Existing Year Conditions

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

Table 10: Existing Year Traffic Noise Contributions

Roadway	Segment	dBA CNEL at Nearest Receptor[1]			Increase Threshold[2]
		Existing	Existing Plus Project	Project Contribution	
Euclid Street	South of West Broadway	66.1	66.1	0.0	+3 dBA
West Broadway	West of Euclid Street	67.4	67.4	0.0	+3 dBA
West Broadway	East of Euclid Street	65.0	65.0	0.0	+3 dBA
Building Construction	East of Project Driveway	65.0	65.0	0.0	+3 dBA

Notes:
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibel
[1] Distance to nearest residential use shown in Table D, does not take into account existing noise barriers.
[2] Increase Threshold obtained from General Plan Goal 2.1, Policy 3 detailed above in Section 4.3.
Source: Federal Highway Administration (FHWA) Traffic Noise Prediction Model FHWA-RD-77-108.

Table 10 shows that the proposed project's permanent roadway noise increases to the nearby homes from the generation of additional vehicular traffic would not exceed the allowable noise increase thresholds detailed above. The proposed project would only increase the Average Daily Traffic (ADT) volumes by a maximum of 0.71 percent; therefore, the project-related roadway noise increase is negligible, as shown in Table 10. A minimal increase in traffic on a busy roadway often results in no measurable increase in traffic noise. Therefore, the proposed project would not result in a substantial permanent increase in ambient noise levels for the existing conditions. Impacts would be less than significant.

Opening Year Conditions

The proposed project's potential off-site traffic noise impacts have been calculated through a comparison of the Opening Year scenario to the Opening Year With Project scenario. The results of this comparison are shown in Table 11.

Table 11: Opening Year Project Traffic Noise Contributions

Roadway	Segment	dBA CNEL at Nearest Receptor[1]			Increase Threshold[2]
		Existing	Existing Plus Project	Project Contribution	
Euclid Street	South of West Broadway	66.2	66.2	0.0	+3 dBA
West Broadway	West of Euclid Street	67.5	67.5	0.0	+3 dBA
West Broadway	East of Euclid Street	65.1	65.1	0.0	+3 dBA
Building Construction	East of Project Driveway	65.1	65.1	0.0	+3 dBA

Notes:
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibel
[1] Distance to nearest residential use shown in Table D, does not take into account existing noise barriers.
[2] Increase Threshold obtained from General Plan Goal 2.1, Policy 3 detailed above in Section 4.3.
Source: Federal Highway Administration (FHWA) Traffic Noise Prediction Model FHWA-RD-77-108.

Table 11 shows that the proposed project's permanent roadway noise increases to the nearby homes from the generation of additional vehicular traffic would not exceed the FTA's allowable increase thresholds detailed above. The proposed project would only increase ADT volumes by a maximum of 0.71 percent; therefore, the project-related roadway noise increase is negligible, as shown in Table 11. A minimal increase in traffic on a busy roadway often results in no measurable increase in traffic noise. Therefore, the proposed project would not result in a substantial permanent increase in ambient noise levels for the opening year conditions. Impacts would be less than significant.

General Plan Buildout Conditions

The proposed project's potential off-site traffic noise impacts have been calculated through a comparison of the General Plan Buildout scenario to the General Plan Buildout With Project scenario. The results of this comparison are shown in Table 12.

Table 12: General Plan Buildout Project Traffic Noise Contributions

Roadway	Segment	dBA CNEL at Nearest Receptor[1]			Increase Threshold[2]
		Existing	Existing Plus Project	Project Contribution	
Euclid Street	South of West Broadway	67.5	67.5	0.0	+3 dBA
West Broadway	West of Euclid Street	67.7	67.7	0.0	+3 dBA
West Broadway	East of Euclid Street	65.4	65.4	0.0	+3 dBA
Building Construction	East of Project Driveway	65.4	65.4	0.0	+3 dBA

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

Notes:
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibel[1] Distance to nearest residential use shown in Table D, does not take into account existing noise barriers.
[2] Increase Threshold obtained from General Plan Goal 2.1, Policy 3 detailed above in Section 4.3.
Source: Federal Highway Administration (FHWA) Traffic Noise Prediction Model FHWA-RD-77-108.

Table 12 shows that the proposed project's permanent roadway noise increases to the nearby homes from the generation of additional vehicular traffic would not exceed the FTA's allowable increase thresholds detailed above. The proposed project would only increase the ADT volumes by a maximum of 0.71 percent; therefore, the project-related roadway noise increase is negligible, as shown in Table 12. A minimal increase in traffic on a busy roadway often results in no measurable increase in traffic noise. Therefore, the proposed project would not result in a substantial permanent increase in ambient noise levels for the General Plan Buildout conditions. Impacts would be less than significant.

Roadway Noise Impacts to the Proposed Townhomes

The proposed project would consist of a residential development with 34 townhomes. Goal 1.1 Part 5 of the General Plan discourages the siting of new homes in areas in excess of 65 dBA CNEL without appropriate mitigation. Section 18.40.090.050 of the Municipal Code requires that exterior noise within common recreation areas of multiple-family dwelling projects be attenuated to a maximum of 65 dBA CNEL and requires the interior of new multiple-family units to be attenuated to 45 dBA CNEL.

It is anticipated that the primary source of noise impacts to the project site would be traffic noise from Broadway that is adjacent to the south side of the project site. The FHWA traffic noise prediction model parameters used in this analysis are discussed in detail in Appendix A, Noise Impact Analysis, Section 6.2, Operations-Related Noise, and the FHWA model printouts are also provided in Appendix A. The exterior and interior noise impacts to the proposed townhomes have been analyzed separately below.

Exterior Noise Impacts

Table 13 shows the calculated roadway noise levels at the private patio areas of the proposed townhomes. It should be noted that this provides for a more conservative analysis than what is required from Section 18.40.090.050, which only requires the common recreation areas to meet the 65 dBA CNEL exterior noise standard. The proposed project includes Project Design Feature (PDF) NOI-1**,** which provided a required 3-foot-high fence that is located on the south side of Building 1 patios as depicted on the Wall Plan (see Appendix A, Noise Impact Analysis) to be constructed of solid material that has a minimum 15 Sound Transmission Class (STC) rating or higher, which would reduce noise impacts. The roadway noise levels were calculated at the private patio areas of the proposed townhomes with implementation of PDF NOI-1, and the results are shown in Table 13.

Table 13: Proposed Townhomes Private Patio Areas Roadway Noise Levels

Building 1 Unit	Roadway	Exterior Noise Levels at Private Patio Areas (dBA CNEL)	Exceed City's 65 dBA CNEL Exterior Noise Standard?
1	West Broadway	63.4	No
4	West Broadway	64.8	No
6	West Broadway	64.8	No

Notes:
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibel
[1] Calculated noise levels account for solid patio wall as depicted in PDF NOI-1.
Source: Federal Highway Administration (FHWA) RD-77-108 Model.

Table 13 shows that with application of PDF NOI-1, the roadway noise levels at the private patio areas would be reduced to within the City's 65 dBA CNEL exterior noise standard. Exterior noise impacts to the proposed townhomes would be less than significant.

Interior Noise Impacts

For the interior noise levels of the proposed townhomes, Table N-3 of the General Plan details that the interior noise level for homes with closed windows and mechanical ventilation would provide a minimum of 20 dBA exterior to interior noise level reduction. PDF NOI-1 has been included in this analysis to ensure that each townhome has a forced air mechanical ventilation system so that windows may be kept in the closed position. The anticipated noise levels have been calculated at the first, second, and third floor façades and interior of the nearest proposed townhomes to Broadway, and the results are shown below in Table 14.

Table 14: Proposed Townhomes Interior Noise Levels from Roadway Noise

Building 1 Unit Number	Floor	Road Noise Level at façade of Townhomes (dBA CNEL)	Townhomes Interior Noise Level1 (dBA CNEL)	Exceed City's 45 dBA CNEL Interior Noise Standards?
1	First	61.6	41.6	No
	Second	64.5	44.5	No
	Third	64.2	44.2	No
2	First	63.3	43.3	No
	Second	64.5	44.5	No
	Third	64.2	44.2	No
3	First	63.6	53.6	No
	Second	64.5	44.5	No
	Third	64.2	44.2	No

Notes:

Building 1 Unit Number	Floor	Road Noise Level at façade of Townhomes (dBA CNEL)	Townhomes Interior Noise Level1 (dBA CNEL)	Exceed City's 45 dBA CNEL Interior Noise Standards?

CNEL = Community Noise Equivalent Level
dBA = A-weighted decibel
[1] Interior noise level based on a 20 dB exterior to interior noise reduction rate (City of Anaheim, 2004)
Source: Federal Highway Administration (FHWA) RD-77-108 Model.

Table 14 shows that the interior noise levels at the proposed townhomes that are adjacent to Broadway would be within the Section 18.40.090.050 of the Municipal Code interior noise standard of 45 dBA CNEL. Therefore, the roadway noise impacts at the interior of the proposed townhomes would be less than significant.

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

Less than significant. The proposed project would not generate or expose persons to excessive groundborne vibration or groundborne noise levels. The following section analyzes the potential vibration impacts associated with the construction and operations of the proposed project.

Construction-Related Vibration Impacts

The construction activities for the proposed project are anticipated to include demolition of the three existing office buildings and associated driveways and parking lots on the project site; site preparation and grading of the 1.55-acre project site; construction of the townhomes; paving of the on-site roads and parking areas, sidewalks and hardscapes; and application of architectural coatings. Vibration impacts from construction activities associated with the proposed project would typically be created from the operation of heavy off-road equipment. The nearest sensitive receptors to the project site are residents at the multi-family homes located as near as 50 feet north of the project site. There are also multi-family homes located as near as 110 feet south of the project site and a church located as near as 20 feet east of the project site.

Since neither the General Plan nor the Municipal Code provide a quantifiable vibration threshold for construction equipment, California Department of Transportation (Caltrans) guidance that is detailed in Appendix A, Noise Impact Analysis, Section 4.2, State Regulations, has been utilized, which defines the threshold of perception from transient sources at 0.25 inch per second peak particle velocity (PPV).

The primary source of vibration during construction would be from the operation of a bulldozer. From Appendix A, Noise Impact Analysis, a large bulldozer would create a vibration level of 0.089 inch per second PPV at 25 feet. Based on typical propagation rates, the vibration level at the nearest off-site structure that may contain sensitive receptors (a church 20 feet to the east) would be 0.11 inch per second PPV. The vibration level at the nearest off-site structure with sensitive receptors would be below the 0.25 inch per second PPV threshold detailed above. Therefore, a less than significant vibration impact is anticipated from construction of the proposed project.

Operations-Related Vibration Impacts

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

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

Less than significant. The proposed project may expose people residing or working in the project area to excessive noise levels from aircraft. The nearest airport is Fullerton Municipal Airport, which is located as near as 3.5 miles northwest of the project site. The project site is located outside of the 60 dBA CNEL noise contours of this airport. Therefore, the proposed project would not be exposed to excessive aircraft noise. Impacts would be less than significant.

Mitigation Measures

None required.

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

Environmental Evaluation

Setting

According to the U.S. Census Bureau QuickFacts page, the City has an estimated population of 346,824 people as of April 2020. The approximate persons per household as of 2020 is estimated to be 3.39 persons. Given that the proposed project would develop 34 dwelling units, the proposed project is estimated to generate approximately 116 new residents.[38]

Would the project:

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

Less than significant impact. As described above, the proposed project would generate 116 new residents, which is approximately 0.03 percent, a negligible increase, of the City's total population in 2020. Additionally, the Southern California Association of Governments (SCAG) Demographics and Growth Technical Report, included as part of the 2020-2045 Connect SoCal Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) forecasts that the City's population would increase to 416,800 persons and 122,700 households by 2045.[39] Therefore, this population growth of 116 persons is not considered unplanned. Additionally, the City's Regional Housing Needs Assessment (RHNA) for the 6th Cycle planning period identifies the future housing need of 17,411 units. The proposed project would contribute 34 dwelling units to the future housing need for the 6th Cycle planning period. Therefore, the proposed project would not induce substantial unplanned population growth in the City, either through new housing or proposing new businesses or indirectly

[38] U.S. Census Bureau. 2020. City of Anaheim Quickfacts. Available: https://www.census.gov/quickfacts/anaheimcitycalifornia. Accessed February 16, 2022.

[39] Southern California Association of Governments (SCAG). 2020. Connect SoCal Demographics and Growth Forecast Technical Report. Available: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579. Accessed February 16, 2022.

through extension of roads or other infrastructure. Therefore, a less than significant impact would occur, and no mitigation is required.

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

No impact. The existing project site consists of three single-story multi-tenant office buildings and a shared asphalt parking lot and does not contain any residential dwelling units. Therefore, the proposed project would not displace any people or housing. No impact would occur, and no mitigation is required.

Mitigation Measures

None required.

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

Environmental Evaluation

Setting

The information in this section is based, in part, on correspondence with City of Anaheim public service providers, included as Appendix G of this report. Correspondence consisted of responses to an inquiry sent via email to public service providers on Friday, August 6, 2021. Responses were provided to FCS between August 17 and August 19, 2021.

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

a) Fire protection?

Less than significant impact. Anaheim Fire & Rescue provides fire protection services to the project site. Anaheim Fire & Rescue is a full service organization designed to provide essential public safety and emergency services to the community and its visitors. Currently 11 engines, six trucks, two battalion chiefs, and two medic units (assigned to the Disneyland Resort 14 hours per shift) are staffed daily by 71 members from 11 fire stations.

Anaheim Fire & Rescue operates a 3-shift system and has established a minimum staffing of 71 suppression personnel per shift, per day. This includes two battalion chiefs and the personnel assigned, under contract, to the Disneyland Resort. Anaheim Fire & Rescue maintains a minimum of four firefighters on 13 front-line companies and three firefighters on three front-line companies.

Anaheim Fire & Rescue has adopted and follows the expectations of the National Incident Management System (NIMS), a program used in the United States to coordinate emergency preparedness and incident management among various federal, State, and local agencies.[40]

Table 15: City of Anaheim Fire Service Facilities

Station	Address	Equipment
Downtown Station 1	500 East Broadway Street	Paramedic Engine 1, Truck 1, Type 3-301, Ambulance 1, and Rehab-1
Brookhurst Station 2	2141 West Crescent Avenue	Paramedic Engine 2 and Truck 2 US&R two Ambulance 2
Resort Station 3	1717 South Clementine Street	Paramedic Engine 3, Truck 3, Type 3-309, Paramedic 3 (Disney), Ambulance 3, and Light Air 3
Orange Station 4	2736 West Orange Avenue	Paramedic Engine 4
La Palma Station 5	2540 La Palma	Paramedic Engine 5 Type 3-305, MMRS 1 and Ambulance 5
Euclid Station 6	1330 South Euclid Street	Paramedic Engine 6, Truck 6, Battalion 2, Ambulance 6, and Hazmat 6 Paramedic 6 (Disney)
Stadium Station 7	2222 East Ball Road	Paramedic Engine 7
Riverdale Station 8	4555 East Riverdale Avenue	Battalion 1, Paramedic Engine 8, Truck 8, Type 6-601, and Type 3-308
Anaheim Hills Station 9	6300 East Nohl Ranch Road	Paramedic Engine 9, Type 6-602 Water Tender 1 and Ambulance 9
Weir Canyon Station 10	8270 East Monte Vista Road	Paramedic Truck 10, Type 3-310
Twila Reid Station 11	3078 West Orange Avenue	Paramedic Engine 11 OES Engine 414, Ambulance 11, and OES Type 3-1211
Source: Anaheim Fire & Rescue 2021.		

Fire stations are strategically located in the City of Anaheim to ensure an efficient demand response to all risk hazards and to maintain recommendations for response times. National response time standards require the first engine to respond within 5 minutes to 90 percent of all incidents and within 8 minutes to the remaining 10 percent. Anaheim Fire & Rescue also requires a truck company to respond within a maximum of 10 minutes to 100 percent of all incidents. The site is currently served by Anaheim Fire & Rescue via the existing infrastructure. Current response times average 3 minutes and 37 seconds for all calls. Additionally, both automatic and mutual aid agreements exist with surrounding jurisdictions.

[40] Young, Lindsey. Interim Fire Marshal, Anaheim Fire and Rescue. Personal communication: email.

The first responding station to the proposed project would be Station 6, located 1.1 miles south of the project site. According to Anaheim Fire & Rescue, there is no anticipated reduction in service level due to the proposed project, and the proposed project is compliant with all currently adopted codes and standards at the time of plan submittal. Development fees would include Fire Department plan check at $137 per hour, and inspection at $68 per hour. Additional fees for fire protection systems vary by system type and size and can be found on the City of Anaheim's website.[41]

Because the proposed project would not reduce service levels and would comply with the required development fees, impacts associated with fire protection services would be less than significant.

b) Police protection?

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

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

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

The existing uses on the site are currently served by Anaheim Police Department. The nearest police station to the project site is the Main Station, located 1.4 miles east of the project site. Existing Police Department facilities would be sufficient to serve the additional demand associated with the proposed project along with the existing demand of the area. For these reasons, the proposed project would not result in a need for new or expanded police protection facilities. Therefore, impacts would be less than significant.

c) Schools?

Less than significant impact. The proposed project is within the Anaheim Elementary School District boundary. Elementary school aged children would be serviced by Loara Elementary School, located

[41] Young, Lindsey. Interim Fire Marshal, Anaheim Fire & Rescue. Personal communication: email.

at 1601 West Broadway. Loara Elementary School is located approximately 0.2 mile from the project site. The current district-wide enrollment is 15,252 students; current capacity is 17,725.

Loara Elementary School is home to approximately 516 students in grades kindergarten through sixth grade and has a housing capacity of 575 seats. Current student generation factors used by the Anaheim Elementary School District are 0.23 per unit for single-family attached homes, and 0.15 per unit for multi-family units. Based on the higher generation rate of 0.23 students per unit for a more conservative estimate, the proposed project would generate eight students in grades K-6. The school district does have the ability to accommodate the demand of the proposed project as part of the existing facilities, as the Loara Elementary School is below enrollment capacity. The increase of students as a result of the proposed project would not cause the school to exceed the enrollment capacity; therefore, the proposed project would not significantly impact school services.

The proposed project would pay the required school district development fees of $2.04 per square-foot for single-family and multi-family attached housing. Payment of the fees would satisfy the requirements of AB 2926 and SB 50 to offset impacts to school services. Therefore, impacts would be less than significant.

According to correspondence with the Anaheim Elementary School District, closure of traffic lanes and sidewalks could have an impact on school vehicle, bus, and pedestrian traffic during construction of the proposed project.[42] However, any closures related to project construction would be temporary and would comply with applicable City guidelines, regarding partial closures and detours. Thus, impacts would be less than significant, and no mitigation is required.

d) Parks?

Less than significant impact. See Section 2.16 for further discussion. The City of Anaheim's Citywide standard of parkland is 2 acres per 1,000 residents. The current provision of parkland acreage is 1.05 acres per 1,000 residents. According to the Anaheim General Plan, Green Element Figure G-1, the project site is not located within a Park Deficiency Area.[43] The park that would serve the proposed project is Chaparral Park, located at 1770 West Broadway, which is 0.3 mile west of the project site. Chaparral Park was developed around 1971, and the majority of the recreational amenities are in need of upgrades. Amenities including the restrooms, an abandoned wading pool, and a play area. The amenities and park facilities, including irrigation and electrical facilities, need improvements.

Additionally, future residents of the proposed project would use the Downtown Community Center located at 250 East Center Street, which is located 1.9 miles east of the project site. The Downtown Community Center was dedicated in 1998 and has a 4,200-square-foot assembly hall, a senior center, and an art gallery.[44] The buildings at the Downtown Community Center have served and

[42] Chavarria, Jesse. Assistant Superintendent for Administrative Services, Anaheim Elementary School District. Personal communication: email. August 18, 2021.

[43] City of Anaheim. 2020. General Plan Green Element. Website: https://www.anaheim.net/DocumentCenter/View/9521#:~:text=he%20Green%20Element%20combines%20Anaheim's,philosophy%20is%20broad%20and%20inclusive. Accessed March 11, 2022.

[44] Anaheim Community Services. 2021. Downtown Anaheim Community Center. Website: https://www.anaheim.net/1018/Downtown-Community-Center. Accessed November 2, 2021.

continue to serve many residents since it opened and are also currently in need of upgrades.[45] Additionally, the proposed project would offer amenities such as interior community gathering areas, which would provide an alternative to public community gathering areas for residents of the proposed project. Furthermore, the proposed project is located approximately 500 feet from Loara Elementary School, which provides additional recreational opportunities and community space through formal and informal joint use agreements with the City.[46]

The proposed project would bring new residents, which would create additional demand on park and recreational facilities. The City of Anaheim has adopted a park in lieu fees resolution. The proposed project would comply with the impact fees of $183,196.76 for 34 residential units.[47] Pursuant to the Quimby Act and Anaheim Municipal Code Section 17.34.010, which requires park in lieu fee for projects with 50 or fewer units, the proposed project would be subject to its fair share of in lieu fees based on the number and type of dwelling units. According to the City of Anaheim Development Impact Fee Justification Study, impact fees are used for the acquisition, installation, and construction of public facilities identified on a needs lists and appropriate administrative costs to mitigate the direct and cumulative impacts of new development in the City. Fees are based on an equivalent development unit method to fairly allocate costs to new development and determine the appropriate fee levels that would provide a source of funds to pay for the proposed facilities.[48] With payment of the required fees, impacts would be less than significant.

e) Other public facilities?

Less than significant impact. The Anaheim Public Library system includes a central library and six branch libraries, along with the Anaheim Heritage Center, Books on the Go! (self-service kiosk at Anaheim Regional Transportation Intermodal Center), and a mobile library. The Anaheim Public Library system has 308,223 library card holders, with 1.3 million annual visits in Fiscal Year 2018/2019. Central Library, which is located at 500 West Broadway, would serve the proposed project. Central Library is located 1.3 miles east of the project site. Additionally, Euclid Library is 1.1 miles south of the project site.

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

The proposed project's impacts to the overall availability per capita of books, media, computers, and library public service space would not result in significant physical or environmental impacts.

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[45] Jimenez, JJ. Principal Project Planner, Community Services Department, City of Anaheim. Personal communication: email. August 24, 2021.

[46] City of Anaheim. 2020. General Plan Green Element. Website: https://www.anaheim.net/DocumentCenter/View/9521#:~:text=he%20Green%20Element%20combines%20Anaheim's,philosophy%20is%20broad%20and%20inclusive. Accessed March 11, 2022.

[47] Ibid.

[48] David Tausig & Associates, Inc. 2017. Development Impact Fee Justification Study. September. Website: https://www.anaheim.net/DocumentCenter/View/21273/Development-Impact-Fee-Study. Accessed March 11, 2022.

Therefore, project-related impacts to library facilities would be less than significant, and no mitigation measures are required.

Mitigation Measures

None required.

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

Environmental Evaluation

Setting

The City of Anaheim owns and operates nearly 50 developed parks totaling almost 700 acres. Park facilities include neighborhood, community, and special use parks. Furthermore, the City has over 50 miles of developed and proposed riding and hiking trails. The City currently maintains park dedication standards that require new development in the City to ensure that 2 acres of parkland would be developed for each 1,000 residents. Depending on the magnitude of residential development, the dedication may be in the form of direct dedication of improved land, the payment of fees in lieu of dedication, or a combination of both. The City has a park dedication ordinance, and every year the City Council adopts a resolution setting park dedication fee.

The current provision of parkland acreage is 1.05 acres per 1,000 residents. The park that would serve the proposed project is Chaparral Park, located at 1770 West Broadway. Chaparral Park was developed around 1971, and the majority of the recreational amenities in need of upgrades. Amenities including the restrooms, an abandoned wading pool, and a play area. The amenities and park facilities, including irrigation and electrical facilities, need improvements.

Additionally, future residents of the proposed project would use the Downtown Community Center located at 250 East Center Street. The Downtown Community Center was dedicated in 1998 and has a 4,200-square-foot assembly hall, a senior center, and an art gallery.[49] The buildings at the Downtown Community Center have served and continue to serve many residents since it opened and are also currently in need of upgrades.[50]

[49] Anaheim Community Services. 2021. Downtown Anaheim Community Center. Website: https://www.anaheim.net/1018/Downtown-Community-Center. Accessed November 2, 2021.

[50] Jimenez, JJ. Principal Project Planner, Community Services Department, City of Anaheim. Personal communication: email. August 24, 2021.

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

Less than significant impact. As previously discussed, the development of the proposed project would result in 116 new residents to the City, which would increase the demand on existing neighborhood and regional parks. Given the City's park dedication standards, the proposed project would be required to develop approximately 0.23 acre of parkland, approximately 10,019-square-feet or pay in lieu fees.

The proposed project would provide 9,525 square feet of open space. Open space on the project site would include 7,544 square feet of common areas and 1,981 square feet of private open space. The private open space would include 1,281 square feet of ground-level patios and 700 square feet of second-floor deck areas. However, the proposed project would not develop additional parks. Therefore, as discussed previously in Impact 2.15(d), the proposed project would be required to pay the City's adopted park in lieu fees, which would be approximately $183,196.76 for 34 residential units.[51] With payment of the required fees, and inclusion of the proposed project's 9,525 square feet of open space, impacts would be less than significant.

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

No impact. As discussed above, although the project includes open space, the project does not propose the construction or expansion of public recreational facilities. The proposed project would result 116 new residents, which would place additional demand on the existing parks. The proposed project would comply with the City's park dedication standard and pay in lieu fees to the City. Therefore, the proposed project would not result in adverse physical impacts associated with such facilities. Thus, no impact would occur and no mitigation is required

Mitigation Measures

None required.

[51] Jimenez, JJ. Principal Project Planner, Community Services Department, City of Anaheim. Personal communication: email. August 24, 2021.

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

Environmental Evaluation

Setting

The analysis contained in this section is partially based on the Traffic Impact Analysis (TIA) prepared by TJW Engineering, Inc. in October 2021, included in Appendix H.

Changes to the CEQA Guidelines were adopted in December 2018 to implement SB 743. CEQA Guideline 15064.3, which describes criteria for evaluating a project's transportation impacts, provides that VMT is generally "the most appropriate measure of transportation impacts," and that except for roadway capacity projects, a project's effect on traffic delays "shall not constitute a significant environmental impact." These provisions went into effect July 1, 2020. Therefore, the VMT analysis evaluated the applicable City of Anaheim screening thresholds to determine whether the proposed project would be expected to create impacts related to VMT.

Trip generation represents the amount of traffic, both inbound and outbound, produced by the proposed project. Determining trip generation for a proposed project is based on projecting the amount of traffic that the specific land uses being proposed would produce. Industry standard Institute of Transportation Engineers (ITE) Trip Generation Manual trip generation rates were used to determine trip generation of for most of the proposed project land uses. Table 16 summarizes the projected AM peak-hour, PM peak-hour and daily trip generation of the proposed project. The proposed project is projected to generate 229 daily trips, 14 AM peak-hour trips, and 17 PM peak-hour trips. The existing uses on the project site generate 338 daily trips. Therefore, the proposed project would result in 159 fewer total daily trips than the existing uses. The proposed project would result in 18 fewer AM peak-hour trips and 24 fewer PM peak-hour trips than existing uses.

Table 16: Proposed Project Trip Generation

Proposed Land Use	Qty	Daily Trips (ADTs)		AM Peak-hour					PM Peak-hour				
		Rate	Volume	Rate	In:Out Split	Volume			Rate	In:Out Split	Volume		
						In	Out	Total			In	Out	Total
Existing													
Medical Offices (720)	6.22 KSF	36.00	224	3.10	79:21	15	4	19	3.93	30:70	7	17	24
General Offices (712)	7.93 KSF	14.39	114	1.67	82:18	11	2	13	2.16	34:66	6	11	17
Subtotal			338			26	6	32			13	28	41
Proposed													
Multi-family Housing (Mid-Rise) (221)	34 DU	5.44	185	0.36	26:74	3	9	12	0.44	61:39	9	6	15
Net Total			**-109**			**-23**	**5**	**-18**			**-2**	**-22**	**-24**

Notes:
ADT = Average Daily Traffic
DU = dwelling unit
KSF = thousand square feet
Source: TJW Engineering, Inc., 2021.

Regional access to the project site is from I-5 via Broadway, Lincoln Avenue, and Euclid Street exits. Site access is planned via one full access driveway along Broadway. The proposed project is anticipated to be built and generating trips in 2022.

Would the project:

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

Less than significant impact. The TIA determined that implementation of the proposed project would not conflict with applicable programs or plans related to circulation. The findings indicate that the proposed project does not warrant improvements to the study intersection because impacts would be less than significant. The roadway analysis results indicate that impacts to roadway segments would also be less than significant (see Appendix A, Noise Report, and Appendix H, Traffic Impact Analysis). Therefore, the proposed project is anticipated to be consistent with the General Plan. Thus, the proposed project would comply with the applicable programs and plan applicable to transportation.

The proposed project would include a pedestrian-friendly design including sidewalks and streetlights for pedestrians. The sidewalks would connect to the existing sidewalks along Broadway. Furthermore, a Class II bicycle lane is proposed along Broadway and an existing Class II bicycle lane is located along South Euclid Street, approximately 382 feet west of the project site. The nearest bus stop is located approximately 382 feet west of the project site near the intersection of South Euclid Street and Broadway. This bus stop provides service to OCTA Route 37. Approximately 0.25-mile north of the project site is another bus stop which provides service to OCTA Route 42. The proposed project would not result in any adverse impacts to public transit, bicycle, or pedestrian facilities.

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

Less than significant impact. Based on the City of Anaheim Traffic Impact Analysis Guidelines for California Environmental Quality Act Analysis (June 2020), some project types are presumed to have a less than significant transportation impact, as their uses can be considered local serving in nature. Among the list of various uses, projects generating less than 110 daily vehicle trips can be presumed to have a less than significant impact. The proposed project is projected to generate 229 total daily trips. The existing uses on the project site generate 338 daily trips. Therefore, the proposed project would result in 159 fewer total daily trips than the existing uses. As such, the proposed project will generate less than 110 daily vehicle trips. Furthermore, the proposed project would result in 18 fewer AM peak-hour trips and 24 fewer PM peak-hour trips. Therefore, the proposed project can be presumed to have a less than significant impact under Type 3: Project Type Screening per the City's Guidelines for VMT analysis. Thus, impacts would be less than significant, and no mitigation is required.

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

Less than significant impact. The proposed project would replace existing driveway access to the project site on Broadway with a new driveway off Broadway to the project site. The driveway would provide full access onto Broadway. The proposed project would also include internal roadways to provide circulation within the development. The project driveway and internal roadways would be developed to comply with the City Building Division and Fire & Rescue Department standards. The proposed project would develop 34 townhomes and would not include the use of any incompatible vehicles or equipment, such as farm equipment. The proposed project is surrounded by a residential uses to the north, south, and east; churches to the east and west; and commercial uses to the west. Therefore, the proposed project's residential development would be compatible with the surrounding uses. Thus, the proposed project would not substantially increase hazards due to design or incompatible uses. Thus, impacts are less than significant, and no mitigation is required.

d) Result in inadequate emergency access?

Less than significant impact. As previously discussed, the proposed project would provide site access via a driveway on Broadway, which is required to be compliant with City Building Division and Fire & Rescue Department standards. This compliance includes that the project driveways and

internal circulation would accommodate standard fire lane turning radiuses and hammerhead turnaround maneuvers. To ensure compliance, the Anaheim Fire & Rescue would review project plans for final approval prior to issuance of a building permit. Further, it is not anticipated that construction of the proposed project would require the closure of any public roadways. Temporary construction activities would not impede the use of the road for emergencies or access for emergency response vehicles. Thus, impacts are less than significant, and no mitigation is required.

Mitigation Measures

None required.

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

Environmental Evaluation

Setting

According to the City's UWMP, the City relies on a combination of imported water, local groundwater, and a small amount of recycled water to meet its water needs. The City works together with two primary agencies, Metropolitan and the OCWD, to ensure a reliable water supply that would continue to serve the City in periods of drought and shortage. The City's main source of water supply is groundwater from the OC Basin. The City has historically relied on approximately 70 percent groundwater (previous 10-year average) and 30 percent imported water from Metropolitan to supply its customers. The same water supply mix is anticipated to be available to the City through 2040.

The City's Sewer and Storm Drain Maintenance Division is responsible for maintenance of the City's sewer and storm drain lines. The proposed project is within the West Anaheim Water Plan of Sanitary Sewers (WAWPSS), adopted in June 2019. The WAWPSS study area consists of approximately 7,450 acres in gross area and approximately 870,000 linear feet of sewer pipelines

that serve a population of approximately 140,500 people. The area is essentially fully developed and designated as a mix of residential, commercial, and industrial land uses. A majority of the wastewater from the WAWPSS study area drains into one of the Orange County Sanitation District (OC San) trunk sewers for further treatment and final discharge. OC Sans trunk sewers within the WAWPSS study area are located on Knott Avenue, Western Avenue, Orange Avenue, Magnolia Avenue and Euclid Avenue. The remainder of the wastewater flows into neighboring cities including Buena Park, Stanton, and Garden Grove.

The Anaheim Public Utilities (APU) Department's Electrical Division currently provides electricity to residents and business industry. The distribution system consists of approximately 1,200 circuit miles of transmission and distribution lines, over 700 miles of which are underground. In order to facilitate the safe and efficient transfer of electricity to residences and businesses, 13 distribution substations are located throughout the City. Anaheim obtains its electric supply from its resources located in or near Anaheim and across the western United States. To round out its electric supply, the City of Anaheim participates in seasonal power exchanges as well as additional market purchases where necessary.[52] Telecommunication services are provided to the City through various companies including AT&T, Spectrum, Cox Communications, and Frontier.

Although the project site is currently developed, to provide a more conservative analysis no deductions have been made to account for existing development demands on utilities in this section.

Would the project:

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

Less than significant impact. The proposed project would develop 34 attached townhomes on an approximately 1.55-acre project site. The proposed project would connect to existing water and sanitary lines on Broadway and would install stormwater drainage systems on-site. A transformer would be to be located in proximity to the main driveway entry along Broadway.

The proposed project's water needs would be met by the City. The proposed project would connect to existing water lines in Broadway and would not require additional water infrastructure to be built of expanded. Further, as described previously in Impact 2.10(d), the proposed project is estimated to result in 116 new residents. Using the UWMP methodology,[53] the proposed project would generate a water demand of 5,927.6 GPD or approximately 6.6 AFY. This demand constitutes approximately 0.01 percent of the total demand. Therefore, the proposed project does not require and would not result in the construction of new water facilities or expansion of existing facilities. Impacts would be less than significant, and no mitigation is required

[52] City of Anaheim. 2004. Anaheim General Plan/Zoning Code Update EIR. Available: http://www.anaheim.net/DocumentCenter/View/2195/513-Public-Services-and-Facilities?bidId=. Accessed February 17, 2022.

[53] City of Anaheim. 2020. Urban Water Management Plan. Available: https://www.anaheim.net/DocumentCenter/View/37199/Anaheim-2020-UWMP?bidId=. Accessed February 16, 2022.

As discussed above, the City's Sewer and Storm Drain Maintenance Division is responsible for maintenance of the City's sewer and storm drain lines. The project site is currently developed and the proposed project is within the WAWPSS. The proposed project would connect to the existing sewer lines in Broadway. The proposed project would ultimately result in a land use designation of Mid Density Residential. According to the WAWPSS land use categories and flow factors, the adjusted flow rates for townhouses for buildout condition would be approximately 215 gallons per day per dwelling unit (GPD/du).[54] Therefore, the proposed project would generate approximately 7,310 GPD. Using the office use generation factor of 1,650 GPD/acre, the existing site generates approximately 2,558 GPD. Therefore, the proposed project would represent an increase in flow of approximately 4,752 GPD. However, according to the WAWPSS, the City's expects an increase in residential demands on the sewer system and that the household growth would remain stable. Further, the deficient pipelines identified by WAWPSS are not located within the project's vicinity. Thus, the proposed project would not require, or result in, the construction of new sewer facilities or expansion of existing facilities. Impacts would be less than significant, and no mitigation is required.

As previously discussed, the proposed project would include on-site stormwater capture infrastructure. The proposed project would implement infiltration BMPs to treat the required stormwater runoff volume. Biotreatment BMPs would also be utilized as a form of pre-treatment prior to entering the proposed infiltration systems. The proposed development would utilize one a BioClean Urban Pond system to retain and infiltrate the entire DCV. The Urban Pond system is an underground infiltration gallery with several rectangular modules with an offset 3-legged design with two narrow legs running parallel and one wider leg running perpendicular. The proposed Urban Pond would have an open bottom and would be underlain by a gravel bed for infiltration. In addition, one MWS Biofiltration vault would be utilized to provide pre-treatment of street runoff prior to entering the infiltration system. The MWS Biofiltration vault utilizes a 3-phase treatment train by collecting the stormwater runoff in a Pre-Treatment Chamber, Planting or "Wetland" Chamber and Discharge Chamber. The proposed project would also include an on-site catch basin, which would be equipped with a CPS device sized for the 1-year 1-hour storm event for the area tributary to the catch basin. The system would be designed to provide enough static volume to retain 100 percent of the DCV, and the gravel bed surface area would provide sufficient surface area infiltrate this entire volume within 48 hours. Thus, the proposed project would not require new or expanded stormwater treatment facilities. Impacts would be less than significant, and no mitigation is required.

The APU Department's Electrical Division currently provides electricity to residents and business industry. The project entire site would be powered by electric and solar, therefore, there would be no gas usage on-site. The proposed project would be located in an urbanized area and connect to existing electric and telecommunication infrastructure; no off-site infrastructure improvements would be required. The proposed project would not substantially increase service demand for utility providers through substantial unplanned population growth and existing capacity would be sufficient to support project residents. Therefore, impacts would be less than significant, and no mitigation is required

[54] City of Anaheim. 2019. West Anaheim Mater Plan of Sanitary Sewers. Available: https://www.anaheim.net/DocumentCenter/View/27618/West-Anaheim-MPSS-2019. Accessed February 16, 2022.

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

Less than significant impact. As discussed previously, the City relies on a combination of imported water, local groundwater, and a small amount of recycled water to meet its water needs. The City works together with two primary agencies, Metropolitan and OCWD to ensure a safe and reliable water supply that would continue to serve the community in periods of drought and shortage. The City's main source of water supply is groundwater from the OC Basin. The City has historically relied on approximately 70 percent groundwater (previous 10-year average) and 30 percent imported water from Metropolitan to supply its customers. Metropolitan's principal sources of water are the Colorado River via the Colorado River Aqueduct and the Lake Oroville watershed in Northern California through the State Water Project. Storage is also a major component of Metropolitan's dry year resource management strategy. Metropolitan's likelihood of having adequate supply capability to meet projected demands is highly dependent on its storage resources.

The proposed project would develop 34 dwelling units, resulting an estimated 116 new residents. According to the UWMP, the City uses a methodology of 51.1 GPCD for new development. Therefore, the proposed project would generate a water demand of 5,927.6 GPD or approximately 6.6 AFY. The proposed project is expected to be operational by 2025. According to the UWMP, the total water supply for the City is approximately 62,302 AFY. For the same year, the City's total demand is expected to be 58,878 AFY. The proposed project would create an additional demand of approximately 6.6 AFY, which is approximately 0.01 percent of the total demand. Thus, there is water supply available for the City, and the water supply demanded by the proposed project would be negligible.

The UWMP describes the City's plans to meet full service demands under all foreseeable hydrologic conditions, meeting single dry year and multiple dry year reliability. Table 17 shows the comparison between the supply and demand for projected years between 2025 and 2045 for different hydrologic scenarios.

Table 17: City of Anaheim Water Supply and Demand Assessment

Supply and Demand Assessment	2025	2030	2035	2040	2045
Normal Year Supply and Demand Comparison					
Supply totals	62,302	65,436	66,648	67,954	68,418
Demand totals	58,878	62,700	64,178	65,771	66,337
Difference	3,424	2,736	2,470	2,183	2,081
Single Dry Year Supply and Demand Comparison					
Supply totals	**64,952**	**68,258**	**69,537**	**70,915**	**71,404**
Demand totals	**62,110**	**66,142**	**67,701**	**69,382**	**69,979**
Difference	2,842	2,116	1,836	1,533	1,425

Supply and Demand Assessment		2025	2030	2035	2040	2045
Multiple Dry Year Supply and Demand Comparison						
First Year	Supply totals	**63,169**	**66,359**	**67,593**	**68,923**	**69,395**
	Demand totals	**59,936**	**63,826**	**65,331**	**66,953**	**67,529**
	Difference	3,233	2,533	2,262	1,970	1,866
Second Year	Supply totals	**64,036**	**67,283**	**68,539**	**69,892**	**70,373**
	Demand totals	**60,993**	**64,953**	**66,484**	**68,134**	**68,721**
	Difference	3,043	2,330	2,055	1,758	1,652
Third Year	Supply totals	**63,940**	**67,180**	**68,433**	**69,784**	**70,264**
	Demand totals	**60,876**	**64,828**	**66,356**	**68,003**	**68,588**
	Difference	3,064	2,352	2,077	1,781	1,676
Fourth Year	Supply totals	**62,253**	**65,384**	**66,595**	**67,900**	**68,364**
	Demand totals	**58,819**	**62,637**	**64,114**	**65,705**	**66,271**
	Difference	3,434	2,747	2,481	2,195	2,093
Fifth Year	Supply totals	**62,783**	**65,949**	**67,173**	**68,492**	**68,961**
	Demand totals	**59,466**	**63,326**	**64,819**	**66,428**	**66,999**
	Difference	3,317	2,623	2,354	2,064	1,962
Source: City of Anaheim UWMP, 2020.						

City demands are projected to be met with groundwater, imported water, and recycled water supplies with available Metropolitan surplus supplies. The proposed project's water demand would be accommodated in multiple dry year scenarios. Therefore, impacts would be less than significant, and no mitigation is required.

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

Less than significant impact. The City's Sewer and Storm Drain Maintenance Division is responsible for maintenance of the City's sewer and storm drain lines. The proposed project is within the WAMPSS study area, which consists of approximately 7,450 acres in gross area and approximately 870,000 linear feet of sewer pipelines. A majority of the wastewater from the WAMPSS study area drains into one of the OC Sans trunk sewers for further treatment and final discharge. OC Sans trunk sewers within the WAWPSS study area are located on Knott Avenue, Western Avenue, Orange Avenue, Magnolia Avenue and Euclid Avenue. The remainder of the wastewater flows into neighboring cities including Buena Park, Stanton, and Garden Grove. OC Sans would serve the project site.[55] OC Sans has two operating facilities that treat wastewater from residential,

[55] Orange County Sanitation District (OC San). 2022. About Us, Service Area web page. Available: https://www.ocsan.gov/about-us/general-information/service-area. Accessed February 16, 2022.

commercial, and industrial sources, including Plant 1, located at 10844 Ellis Avenue in Fountain Valley, and Plant 2 located at 22212 Brookhurst Street in Huntington Beach. Plant 1 has a current capacity of 144 million gallons per day (MGD) and Plant 2 has a current capacity of 108 MGD. These capacities are expected to expand to 204 MGD for Plant 1 and 144 MGD for Plant 2.[56] According to OC Sans, the estimates average daily flow of wastewater received is approximately 118 MGD at Plant No. 1 and 64 MGD at Plant No. 2 for a total of 182 MGD.[57]

The proposed project would connect to the existing sewer lines in Broadway. The proposed project would ultimately result in a land use designation of Mid Density Residential. According to the WAMPSS land use categories and flow factors, the adjusted flow rates for townhouses for buildout condition would be approximately 215 GPD/du.[58] Therefore, the proposed project would generate approximately 7,310 GPD. Using the office use generation factor of 1,650 GPD/acre, the existing site generates approximately 2,558 GPD. Therefore, the proposed project would represent an increase in flow of approximately 4,752 GPD. Table 18 below describes the availability of sewer treatment at the OC Sans plants for the proposed project.

Table 18: Orange County Sanitation District Sewer Treatment Availability

Plant	2020-2021 Average Daily Flow (mgd)	Total Capacity (mgd)	Remaining Capacity (mgd)	Project Average Daily Flow (mgd)	Project's Percentage of Remaining Capacity (mgd)
Plant No. 1	118	144	26	0.009	0.035%
Plant No. 2	64	108	44	0.009	0.02%
Total	**182**	**252**	**70**	**–**	**–**

Source: California Department of Resources Recycling and Recovery (CalRecycle) Solid Waste Information System (SWIS) 2022.

As shown in the table above, there would be adequate treatment capacity for the proposed project's sewer flows. Additionally, as demonstrated in Appendix G, Sewer Capacity, there is adequate sewer capacity available to accommodate the additional sewer flows from the proposed project, and off-site improvements would not be required Therefore, impacts would be less than significant, and no mitigation is required.

[56] City of Anaheim. 2004. Anaheim General Plan/Zoning Code Update EIR. Available: http://www.anaheim.net/DocumentCenter/View/2195/513-Public-Services-and-Facilities?bidId=. Accessed February 17, 2022.
[57] Orange County Sanitation District (OC San). 2022. Regional Sewer Service, Facts and Key Statistics web page. Available: https://www.ocsan.gov/services/regional-sewer-service. Accessed February 17, 2022.
[58] City of Anaheim. 2019. West Anaheim Mater Plan of Sanitary Sewers. Available: https://www.anaheim.net/DocumentCenter/View/27618/West-Anaheim-MPSS-2019. Accessed February 16, 2022.

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

Less than significant impact. Republic Services is a private recycling and nonhazardous solid waste hauler and provides solid waste services to the City. Republic Services collects solid waste for all residential, commercial, and industrial waste and recycling services. Solid waste is disposed of in Orange County landfills. Currently, there are three active landfills that are owned and operated by the County, including Frank R. Bowerman Landfill in Irvine, Olinda Alpha Landfill in Brea, and Prima Deshecha Landfill in San Juan Capistrano. In order to ensure that the maximum permitted daily tonnage at a particular landfill is not exceeded, refuse trucks may have to transport material to one or the other.[59] The majority of this waste is taken to the Olinda Alpha Sanitary Landfill, which is located in the City of Brea. The Olinda Alpha Landfill is the closest facility to the City and would likely be the solid waste facility most often receiving waste from the project site.[60] According to the California Department of Resources Recycling and Recovery (CalRecycle) Solid Waste Information System (SWIS), the landfills that serve the City have the following capacities, as described in Table 19**.**

Table 19: Orange County Landfill Availability

Landfill	Landfill Address	Closure Date	Maximum Daily Permitted Throughput (tons per day)	Maximum Permitted Capacity (cubic yards)	Remaining Capacity (cubic yards)
Frank R. Bowerman	11002 Bee Canyon Access Road, Irvine CA 92618	2053	11,500	266,000,000	205,000,000
Olinda Alpha	1942 N**orth** Valencia Avenue, Brea CA 92823	2036	8,000	148,800.000	17,500,000
Prima Deshecha	32250 Avenida La Pata, San Juan Capistrano, CA 92675	2102	4,000	172,100,000	134,300,000
Source: California Department of Resources Recycling and Recovery (CalRecycle) Solid Waste Information System (SWIS) Facility Search, 2022.					

The proposed project would replace existing uses to develop 34 dwelling units, or households. CalRecycle provides a solid waste generation factor to estimate the amount of solid waste generated by residential projects. Using the generate rate of 12.23 pounds (lbs) per household per day for residential development, the proposed project would generate approximately 416 lbs per day of solid waste, or approximately 0.19 tons per day. Therefore, the proposed project would represent approximately 0.002 percent of the maximum daily permitted throughput for the Olinda Alpha Landfill, which would likely receive the most solid waste from the project site. Therefore, the existing

[59] City of Anaheim. 2004. Anaheim General Plan/Zoning Code Update EIR. Available: http://www.anaheim.net/DocumentCenter/View/2195/513-Public-Services-and-Facilities?bidId=. Accessed February 17, 2022.

[60] California Department of Resources Recycling and Recovery (CalRecycle). 2022. Solid Waste Information System (SWIS). Available: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2750?siteID=2085. Accessed February 17, 2022.

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

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

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

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

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

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

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

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

Mitigation Measures

None required.

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

Environmental Evaluation

Setting

According to the CAL FIRE Hazard Severity Zone Map, the project site is not within a State Responsibility Area (SRA). The project site is in a Non- VHFHSZ zone within a LRA.[61]

Would the project:

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

No impact. As discussed in *Setting*, the proposed project is not located in or near an SRA or land classified as VHFHSZ. Therefore, no impact would occur.

According to the City's Know Your Way Evacuation Zones web page, the project site is located outside of the evacuation zones area and the streets surrounding the proposed project would not be used for this evacuation program.[62] Further, project construction would not require the complete closure of any public or private streets or roadways during construction. Temporary construction

[61] California Department of Forestry and Fire Protection (CAL FIRE). 2022. Fire Hazard Severity Zone online viewer. Available: https://egis.fire.ca.gov/FHSZ/. Accessed February 16, 2022.

[62] City of Anaheim. 2022. Know Your Way Evacuation Zone web page. Available: https://anaheim.net/6063/Know-Your-Way-Evacuation-Zones. Accessed February 16, 2022.

activities would not impede use of the road for emergencies or access for emergency response vehicles. Therefore, the proposed project would not result in inadequate emergency access. No impact would occur, and no mitigation is required.

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. As discussed above and in *Setting*, the project site is not within or near an SRA or land classified as VHFHSZ. Furthermore, the project site does not have features with the potential to exacerbate wildfire. Therefore, the proposed project would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Thus, no impact would occur, and no mitigation is required.

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. As discussed above and in *Setting*, the project site is not within or near an SRA or land classified as VHFHSZ. Furthermore, the project site does include the installation of infrastructure that would exacerbate wildfire risk. The proposed project is in an urbanized area and would connect to the existing infrastructure. Therefore, the proposed project would not exacerbate fire risk. Thus, no impact would occur, and no mitigation is required.

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. As discussed above and in *Setting*, the proposed project is not located in or near an SRA or land classified as VHFHSZ. Therefore, no impact would occur related to loss, injury, or death as a result of exposure to wildfires. The proposed project does not have other features with the potential to exacerbate wildfire, downstream flooding, or landslide risks. Because the proposed project is located in an urbanized area, it would not require the installation of maintenance of associated infrastructure that may exacerbate fire risk or result in ongoing impacts to the environment. Further, as discussed in Section 2.10, the proposed project is not located in an area subject to flood hazards, and the proposed project would not contribute to runoff or flooding. Thus, no impact would occur, and no mitigation is required.

Mitigation Measures

None required.

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

Environmental Evaluation

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

Less than significant impact with mitigation incorporated. Based on the analysis provided in Section 2.4, Biological Resources, the proposed project's impacts related to special-status species would be less than significant with mitigation incorporated. Because there is a potential for protected bird's nests to occur on the project site, MM BIO-1 would be implemented. Implementation of MM BIO-1, which would require pre-construction surveys and avoidance measures, would reduce impacts to special-status species. With implementation of MM BIO-1, the proposed project would not substantially degrade the quality of the environment, reduce fish or wildlife habitat, reduce fish or wildlife populations below self-sustaining levels, eliminate a plant or animal community, or reduce the number or range of a rare or endangered plant or animal.

Based on the analysis provided in Section 2.5, Cultural Resources, the proposed project's impacts related to California history or prehistory would be less than significant with mitigation incorporated. While there are no known historic resources on the project site, it is possible that earthmoving

activities associated with construction could encounter previously undiscovered historic resources. Implementation of MM CUL-1 would establish a procedure for handling historical resources that may be discovered prior to and during project construction and ensure that potential impacts on historic resources are reduced to a less than significant level. Additionally, there are no known archaeological resources on the project site, but there is always a possibility that earthmoving activities associated with construction could encounter previously undiscovered archaeological resources. Implementation of MM CUL-1 would ensure that potential impacts on archaeological resources are reduced to a less than significant level. Additionally, there is a low potential that earthmoving activities associated with project construction could potentially damage or destroy previously undiscovered human remains. MM CUL-2 specifies the procedures to follow in the event human remains are uncovered. In addition to compliance with required guidelines and statutes, implementation of MM CUL-2 would reduce potential impacts on human remains to a less than significant level. MM TCR-1, MM TCR-2, MM TCR-3, and MM TCR-4 In addition to reducing impacts on historic and prehistoric resources, implementation of MM CUL-1, MM CUL-2, MM TCR-1, MM TCR-2, MM TCR-3, and MM TCR-4 would also reduce any impacts on TCRs.

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

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

Less than significant impact. The analysis presented in this Draft IS/MND includes a review of proposed project's potential impacts related to air quality, biological resources, cultural resources, noise, and transportation, among other environmental issue areas. Past, present, and reasonably foreseeable future projects would comply with federal, State, and local regulations, including building codes and planning documents, to avoid adverse effects to resources or mitigate for significant impacts to these resources. No cumulative impacts were identified in any topical area. Moreover, as presented throughout this Draft IS/MND, the proposed project's incremental contribution to cumulative impacts would either be less than significant with mitigation incorporated, less than significant, or there would be no impacts.

Section 2.3, Air Quality, analyzed cumulative impacts related to pollutants and determined that regional daily construction emissions would not exceed any of SCAQMD's thresholds of significance, and that net daily operational emissions and net long-term operational emissions would not exceed any of SCAQMD's thresholds of significance. Therefore, proposed project would not result in a cumulatively considerable net increase of operational emissions, and there would be no cumulative

impacts related to air quality. As demonstrated throughout this Draft IS/MND, the proposed project would not result in other cumulative impacts. Therefore, the proposed project would cause less than significant cumulative impacts, and no mitigation is required.

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

Less than significant impact with mitigation incorporated. Based on the discussion provided in the Project Description and the analysis presented in Sections 2.1 through 2.19 of this Draft IS/MND, the proposed project would not cause substantial adverse effects on human beings, either directly or indirectly, because the project's potential impacts would be mitigated to a less than significant level. Therefore, with implementation of MM BIO-1, MM CUL-1, MM CUL-2, MM TCR-1, MM TCR-2, MM TCR-3, MM TCR-4, MM GEO-1, MM GEO-2, and MM HAZ-1, the proposed project would not result in substantial adverse effects on human beings. Impacts would be less than significant with mitigation incorporated.

Mitigation Measures

Implementation of MM BIO-1, MM CUL-1, MM CUL-2, MM TCR-1, MM TCR-2, MM TCR-3, MM TCR-4, MM GEO-1, MM GEO-2, and MM HAZ-1.

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