

**DRAFT
ENVIRONMENTAL IMPACT REPORT**

**2021–2029 CYPRESS HOUSING ELEMENT
IMPLEMENTATION PROJECT
CYPRESS, CALIFORNIA**

MAY 2024



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LIST OF ACRONYMS AND ABBREVIATIONS

°C	degrees Celsius
°F	degrees Fahrenheit
µg/m ³	micrograms per cubic meter
1990 CBPC Specific Plan	Cypress Business and Professional Center Specific Plan
AB	Assembly Bill
ACS	American Community Survey
ADT	average daily traffic
ADU	accessory dwelling unit
afy	acre-feet per year
AHS	American Housing Survey
APN	Assessor's Parcel Number
APS	Alternative Planning Strategy
AQMP	Air Quality Management Plan
AUHSD	Anaheim Union High School District
Basin	South Coast Air Basin
BERD	Built Environment Resources Database
BMPs	Best Management Practices
BTU	British thermal units
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
CalEEMod	California Emissions Estimator Model
CALGreen Code	California Green Building Standards Code
California Register	California Register of Historical Resources
CalRecycle	California Department of Resources Recycling and Recovery
CARB	California Air Resources Board
CAT	Climate Action Team
CBC	California Building Code
CBPC Specific Plan	Cypress Business and Professional Center Specific Plan



CBSC	California Building Standards Commission
CCAA	California Clean Air Act
CCR	California Code of Regulations
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CESD	Centralia Elementary School District
CF ₄	tetrafluoromethane
CFC	California Fire Code
CH ₄	methane
CHRB	California Horse Racing Board
CHRIS	California Historical Resources Information System
City	City of Cypress
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalents
COSR	Conservation/Open Space/Recreation
County	County of Orange
CPD	Cypress Police Department
CPUC	California Public Utilities Commission
CSD	Cypress School District
CTCC Specific Plan	Cypress Town Center and Commons Specific Plan 2.0
dB	decibels
dBA	A-weighted decibels
DOC	California Department of Conservation
DPR	Department of Parks and Recreation
du/ac	dwelling units per acre
EIR	Environmental Impact Report
EMFAC2021	Vehicle Emission Factor Model
EO	Executive Order



FIP	Federal Implementation Plan
ft	foot/feet
FTA	Federal Transit Administration
gpy	gallons per year
GHG	greenhouse gas
GSWC	Golden State Water Company
GWh	gigawatt-hours
GWP	Global Warming Potential
HFCs	hydrofluorocarbons
HRA	Historic Resources Assessment
HRI	California State Historic Resources Inventory
HSC	California Health and Safety Code
I-405	Interstate 405
I-605	Interstate 605
ICU	Intersection Capacity Utilization
inch/sec	inches per second
IS	Initial Study
IS/MND	Initial Study/Mitigated Negative Declaration
IS/ND	Initial Study/Negative Declaration
JFTB	Joint Forces Training Base
kBTU	thousand British thermal units
kWh	kilowatt-hours
LARC	Los Alamitos Race Course
LASP	Lincoln Avenue Specific Plan
LAUSD	Los Alamitos Unified School District
lbs/day	pounds per day
LCFS	low carbon fuel standard
L _{dn}	day-night average noise level
L _{eq}	equivalent continuous sound level
L _{max}	maximum noise level
LOS	level of service



LST	Localized Significance Thresholds
mg/m ³	milligrams per cubic meter
mgd	million gallons per day
MLD	Most Likely Descendant
MMT	million metric tons
MMT CO ₂ e	million metric tons of carbon dioxide equivalents
MPAH	Master Plan of Arterial Highways
mpg	miles per gallon
mph	miles per hour
MPO	Metropolitan Planning Organization
MSA	Metropolitan Statistical Area
MT	metric tons
MT CO ₂ e/yr	metric tons of carbon dioxide equivalents per year
MT CO ₂ e/yr/SP	metric tons of carbon dioxide equivalents per year per service population
MW	megawatts
MWD	Metropolitan Water District of Southern California
MWDOC	Municipal Water District of Orange County
N ₂ O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NAHC	Native American Heritage Commission
National Register	National Register of Historic Places
NEPA	National Environmental Policy Act
NHTSA	National Highway Traffic Safety Administration
NO ₂	nitrogen dioxide
NOP	Notice of Preparation
NO _x	nitrogen oxides
NPS	National Park Service
O ₃	ozone
OCFA	Orange County Fire Authority



OCFCD	Orange County Flood Control District
OCPL	Orange County Public Libraries
OCSD	Orange County Sanitation District
OCTA	Orange County Transportation Authority
OCTAM	Orange County Transportation Analysis Model
OCWR	Orange County Waste and Recycling
OHP	California Office of Historic Preservation
OPR	Governor’s Office of Planning Research
OTB	off track betting
P.A.C.E.	Positive Actions through Character Education
Pb	lead
PEIR	Program Environmental Impact Report
PFCs	perfluorocarbons
PM ₁₀	particulate matter less than 10 microns in diameter
PM _{2.5}	particulate matter less than 2.5 microns in diameter
ppb	parts per billion
ppm	parts per million
PRC	Public Resources Code
project	2021–2029 Cypress Housing Element Implementation Project
QH	Quarter Horse
RCM	Regulatory Compliance Measure
RCP	Regional Comprehensive Plan
RHNA	Regional Housing Needs Assessment
ROGs	reactive organic gases
RPS	Renewables Portfolio Standard
RTIP	Regional Transportation Improvement Program
RTP	Regional Transportation Plans
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District



SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SCH	State Clearinghouse
SCS	Sustainable Communities Strategy
SF ₆	sulfur hexafluoride
SHL	California Historical Landmarks
SIP	State Implementation Plan
SLF	Sacred Lands File
SO ₂	sulfur dioxide
SoCalGas	Southern California Gas Company
SO _x	sulfur oxides
SPHI	California Points of Historical Interest
SR-22	State Route 22
SR-39	State Route 39, also known as Beach Boulevard
SR-91	State Route 91
SWPPP	Storm Water Pollution Prevention Plan
TACs	Toxic Air Contaminants
TAZ	Transportation Analysis Zones
TB	thoroughbred
tpd	tons per day
trotters	standardbreds
USDOT	United States Department of Transportation
USEPA	United States Environmental Protection Agency
UWMP	Urban Water Management Plan
v/c	volume-to-capacity
VdB	vibration velocity decibels
VMT	vehicle miles traveled
VOCs	volatile organic compounds
Working Group	GHG CEQA Significance Threshold Working Group
WQMP	Water Quality Management Plan
ZEVs	zero emission vehicles



1.0 EXECUTIVE SUMMARY

1.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that local government agencies, before taking action on projects over which they have discretionary approval authority, consider the environmental consequences of such projects. An Environmental Impact Report (EIR) is a document designed to provide to the public and to local and State governmental agency decision-makers an analysis of potential environmental consequences of a project to support informed decision-making.

This Draft Program EIR (PEIR) has been prepared by the City of Cypress (City) to evaluate environmental impacts associated with the proposed 2021–2029 Cypress Housing Element Implementation Project (proposed project); to discuss alternatives; and to propose mitigation measures that will minimize, offset, or otherwise reduce or avoid the identified potentially significant environmental impacts.

This PEIR has been prepared pursuant to the requirements of CEQA and the *State CEQA Guidelines*. The City is the Lead Agency, and as such, has reviewed all submitted drafts, technical studies, and reports for consistency with applicable City regulations and policies and has commissioned the preparation of this PEIR to reflect its own independent judgment.

Data for this PEIR were obtained from on-site field observations; discussion with affected agencies; review of adopted plans and policies; review of available studies, reports, and data; and specialized environmental assessments prepared for the project (e.g., air quality, noise, and traffic).

The Executive Summary is intended to highlight the major areas of importance in the environmental analysis for the proposed project as required by *State CEQA Guidelines* Section 15123. The Executive Summary includes a brief description of the proposed project, areas of controversy known to the City, including issues raised by agencies and the public, a summary of the significant unavoidable impacts of the proposed project, and a summary of alternatives evaluated in the EIR. This Executive Summary also provides a table summarizing (1) the potential environmental impacts that would occur as a result of project implementation and operation; (2) the level of significance prior to implementation of mitigation measures; (3) regulatory compliance measures and mitigation measures that avoid or reduce the significant impacts of the proposed project, and (4) the level of significance after mitigation measures are implemented.

1.2 SUMMARY OF PROJECT DESCRIPTION

The proposed project is a programmatic update to the City's General Plan, Lincoln Avenue Specific Plan (LASP), the Cypress Town Center and Commons Specific Plan 2.0 (CTCC Specific Plan), the 2012 Cypress Business and Professional Center Specific Plan (CBPC Specific Plan), and the Zoning Ordinance and would not directly result in physical development. The proposed project includes amendments to the City's Zoning Ordinance and an update of the City's General Plan to reflect the 2021–2029 Housing Element adopted on June 27, 2022. The proposed project would update the City's General Plan and Zoning Ordinance, and the LASP to be "internally consistent," meaning any and all conflicts must be acknowledged and resolved. In order for the 2021–2029 Housing Element



to be internally consistent with the Zoning Ordinance and Specific Plans, the proposed project would rezone sites and/or amend the General Plan to accommodate the City’s housing needs, as set forth in the 2021–2029 Housing Element.

The proposed project divides the City’s Regional Housing Needs Assessment (RHNA) between the CTCC Specific Plan area, the CBPC Specific Plan area, and the LASP area. Under the proposed project, the majority of the zoning in the CTCC Specific Plan would remain unchanged, the allowable residential density within several parcels of the CTCC Specific Plan Area would increase up to 30 dwelling units per acre to accommodate a maximum of 676 units.¹ The existing unit cap of 1,250 units would also be removed to allow development within these districts up to the existing maximum allowable density regardless of the number of units already developed within the CTCC Specific Plan area. With these proposed changes, an estimated 1,791 units could be accommodated within the CTCC Specific Plan area, in addition to the 135-unit Belmont project currently under construction.

The proposed project also includes one opportunity site on Katella Avenue adjacent to the CTCC Specific Plan area (Site #115, 4955 Katella) in the CBPC Specific Plan area. The zoning on this parcel would be amended from a Professional Office/Hotel and Support Commercial zoning designation to allow residential densities of up to 60 dwelling units per acre (du/ac), which would accommodate an estimated 321 units.

The remaining RHNA sites would be accommodated within the LASP. The proposed project would expand the maximum allowable density of 30 du/ac to the majority of the LASP area, increasing development potential by approximately 1,317 units. With these amendments, the LASP could accommodate a total of approximately 1,644 units.

Overall, the proposed rezoning actions under the proposed project would increase the City’s development capacity to 4,260 units, or an increase of 2,314 units compared to the City’s existing planning and zoning documents. Table 1.A provides a summary of the proposed project scenario.

Table 1.A: Proposed Project Summary

Specific Plan	Proposed Increase In Housing Unit Capacity
Lincoln Avenue Specific Plan	1,317
Cypress Town Center and Commons Specific Plan 2.0	676
Cypress Business and Professional Center Specific Plan	321
Total	2,314

Source: City of Cypress Planning Department (2023).

1.3 AREAS OF CONTROVERSY

Pursuant to *State CEQA Guidelines* Section 15123, this PEIR acknowledges the areas of controversy and issues to be resolved that are known to the City or were raised during the scoping process. The City held a public scoping meeting at the Cypress Community Center on May 2, 2023, to present the

¹ Although the revised densities layout could facilitate the development of up to 731 units, the City would impose a unit cap and no more than 676 units would be permitted.



proposed project and to solicit input from interested parties regarding environmental issues that should be addressed in this PEIR.

During the Notice of Preparation (NOP) comment period, the City received one comment letter from the California Department of Transportation (Caltrans) District 12. Caltrans requested that the proposed project's potential short- and long-term traffic impacts through the preparation of a Traffic Impact Study, including analysis of vehicles miles traveled (VMT). In addition, the analysis of the proposed project should include the evaluation of potential impacts on the movement of goods, transportation system, and long-range development planning. Lastly, Caltrans indicated that any project work proposed in the vicinity of the State right-of-way would require an encroachment permit and all associated potential environmental concerns must be adequately addressed.

This PEIR addresses the above area of concern in detail, examines project-related and cumulative environmental impacts, identifies significant adverse environmental impacts, and proposes mitigation measures and/or alternatives designed to reduce or eliminate potentially significant impacts. Appendix A to this PEIR includes the Initial Study and a copy of the written comment received in response to the NOP.

1.4 SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(b) of the *State CEQA Guidelines* requires that an EIR describe significant environmental impacts that cannot be avoided, including those effects that can be mitigated but not reduced to a less than significant level. The following is a summary of the impacts that are considered significant adverse and unavoidable after all mitigation is applied. These impacts are also described in detail in Chapter 4.0, Existing Environmental Setting, Environmental Analysis, Impacts, and Mitigation Measures.

1.4.1 Air Quality

The proposed project would result in significant and unavoidable impacts relating to air quality. Specifically, the proposed project would result in significant and unavoidable long-term operational pollutant emissions, have the potential to conflict or obstruct implementation of applicable air quality plans under Indicator 1 (as detailed in Section 4.1, Air Quality), and expose sensitive receptors to substantial pollutant concentrations.

While Mitigation Measure MM AQ-1 would significantly reduce criteria air pollutant emissions generated during operational activities associated with the proposed project, there is currently not enough information to quantify emissions of specific project development that may occur under the proposed project. Without quantification to guarantee a less than significant finding, future development projects may still exceed the South Coast Air Quality Management District (SCAQMD) regional significance thresholds. Therefore, operation of the proposed project would result in a significant impact related to a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard. In addition, because information regarding operational characteristics of future specific development projects and the associated emissions cannot be determined at the time of this analysis, cumulative growth within the City could result in potential toxic air contaminant (TAC) health risks that could cumulatively contribute to elevated health risks in the City. Therefore, in an



abundance of caution, the proposed project’s potential to expose sensitive receptors to substantial pollutant concentrations impacts would be considered significant and unavoidable.

1.5 ALTERNATIVES

1.5.1 Alternatives Evaluated in this PEIR

Public Resources Code (PRC) Section 21100 and *State CEQA Guidelines* Section 15126 require an EIR to identify and discuss a No Project Alternative and a reasonable range of alternatives to the proposed project that would feasibly attain most of the basic objectives of the project and would avoid or substantially lessen any of the significant environmental impacts. The following three alternatives have been determined to represent a reasonable range of alternatives that have the potential to feasibly attain most of the basic objectives of the proposed project but that may avoid or substantially lessen any of the significant impacts of the proposed project. Therefore, the alternatives considered in this PEIR include the following:

- **Alternative 1 – No Project Alternative:** CEQA requires analysis of a “No Project” Alternative. The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. According to *State CEQA Guidelines* Section 15126.6(e)(3)(C), the lead agency should proceed to analyze the impacts of the no project alternative by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.
- **Reduced Intensity Alternative.** Under the Reduced Intensity Alternative, the existing residential densities permitted in the Cypress Town Center and Commons Specific Plan 2.0 (CTCC Specific Plan) would remain unchanged, and no additional residential units would be proposed in the CTCC Specific Plan area. The Reduced Intensity Alternative divides the proposed housing units between the CBPC Specific Plan area and the LASP area. The Reduced Intensity Alternative proposes to accommodate 321 units in the Cypress Business and Professional Center Specific Plan area and 1,317 units in the LASP area. The Reduced Intensity Alternative also includes an opportunity site located on the southeast corner of Orange Avenue and Grindlay Street which would accommodate 30 moderate/above moderate-income units. In total, the Reduced Intensity Alternative proposes to accommodate an increase of 1,668 units at the opportunity sites. In addition to the 1,946 units already accommodated under existing zoning within the City, implementation of the Reduced Intensity Alternative would increase the residential development capacity in the City to a total of 3,614 housing units.
- **Alternative 2: Lincoln Avenue Specific Plan Mixed Density.** Under Alternative 2, the existing residential densities permitted in the Cypress Town Center and Commons Specific Plan 2.0 (CTCC Specific Plan) would remain unchanged and would be able to accommodate a total of 1,115 units. Alternative 2 also proposes to vary densities within the LASP area between 30 du/ac and 60 du/ac to accommodate the development of approximately 2,378 new units (1,838 lower income units and 540 moderate/above moderate-income units). The Katella Avenue opportunity site in the Planned Business Park (PBP) Zone would be included in Alternative 2 as described under the proposed project. Alternative 2 also includes the opportunity site located



on the southeast corner of Orange Avenue and Grindlay Street which would accommodate 30 moderate/above moderate-income units. Overall, Alternative 2 would accommodate an additional 2,403 housing units at the opportunity sites. In addition to the 1,946 units already accommodated under existing zoning within the City, the proposed project would increase the residential development capacity in the City to a total of 4,349 housing units. If the City proceeds with Alternative 2, amendments to the LASP and the City's Zoning Ordinance would be undertaken through the normal public hearing process.

- **Race Course Avoidance Alternative.** Under the Race Course Avoidance Alternative, opportunity sites within the CTCC Specific Plan would not include development on the areas where the essential features of the Los Alamitos Race Course, including the track, grandstands, and race course entry, are located. All other proposed project elements, including the opportunity sites within the CBPC Specific Plan area, LASP area, and at the Katella Avenue opportunity site, would remain unchanged from the proposed project. Implementation of the Race Course Avoidance Alternative would remove approximately 56.5 acres of CTCC Specific Plan area from future development and would reduce the total number of additional housing units within the CTCC Specific Plan area by approximately 560 units as compared to the proposed project. Overall, the Race Course Avoidance Alternative would accommodate an estimated 1,243 units within the CTCC Specific Plan area and approximately 1,754 housing units at the opportunity sites. With the removal of approximately 560 additional residential units within the CTCC Specific Plan area, implementation of the Race Course Avoidance Alternative would increase the residential development capacity in the City to a total of 3,700 housing units instead of the proposed project's increase of 4,260 housing units.

1.5.2 Identification of the Environmentally Superior Alternative

CEQA requires the identification of an Environmentally Superior Alternative among the proposed project and the alternatives evaluated in an EIR. *State CEQA Guidelines* Section 15126.6(e)(2) provides that, if the No Project Alternative is the Environmentally Superior Alternative, then the EIR shall also identify an Environmentally Superior Alternative among the other alternatives and the proposed project.

The No Project Alternative would have the least impact on the environment as the opportunity sites would remain in their existing conditions and would thereby avoid most of the proposed project's environmental impacts. However, the No Project Alternative would not provide accommodation for the City's RHNA allocation and the City would not be able to meet its housing obligations as defined by the State RHNA allocations. Because local jurisdictions are required by State law (Government Code Section 65580 et seq.) to plan for their fair share of projected housing construction needs in their region and implementation of the No project Alternative would not meet this requirement, a No Project Alternative was considered and rejected by the City of Cypress. In addition, the No Project Alternative cannot be the only Environmentally Superior Alternative. As such, the EIR shall also identify the proposed project or one of the other alternatives as the Environmentally Superior Alternative.

All impacts under the Reduced Intensity Alternative would be similar to or less than the proposed project. The Reduced Intensity Alternative would result in reduced impacts on the environment



because the opportunity sites would be developed at a reduced density, thereby reducing most of the proposed project’s environmental impacts. However, the Reduced Intensity Alternative would either not meet the project objectives or meet them to a lesser extent than the proposed project. Most notably, the Reduced Intensity Alternative would not meet the RHNA requirement of 3,936 as required by State law (Government Code Section 65580 et seq.).

In addition, all impacts under the Race Course Avoidance Alternative would be similar to or less than the proposed project. The Race Course Avoidance Alternative would result in reduced impacts on the environment because the opportunity sites within the CTCC Specific Plan would be developed at a reduced density in order to preserve the essential features of the Los Alamitos Race Course, thereby reducing most of the proposed project’s environmental impacts. However, the Race Course Avoidance Alternative would either not meet the project objectives or meet them to a lesser extent than the proposed project. Most notably, the Race Course Avoidance Alternative would not fulfill the intent of the voter approved Measure A, which approved the CTCC Specific Plan.

As such, the proposed project is the Environmentally Superior Alternative. With the exception of air quality, implementation of the proposed project would result in less than significant impacts on the environmental impact areas analyzed in this PEIR. In contrast, implementation of Alternative 2 would result in similar significant and unavoidable impacts on air quality, and greater environmental impacts associated with energy, greenhouse gas emissions, noise, population and housing, public services, tribal cultural resources, transportation, and utilities and service systems. Further, implementation of the proposed project would meet all of the identified project objectives, including meeting the City’s RHNA requirement of 3,936 as required by State law (Government Code Section 65580 et seq.). Accordingly, it is determined that the proposed project is the Environmentally Superior Alternative because implementation would result in the least environmental impacts while meeting all of the project’s objectives.

1.6 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Table 1.B identifies the potential project environmental impacts, proposed mitigation measures, and level of significance after mitigation is incorporated into the project. Environmental topics addressed in this PEIR include Air Quality, Cultural Resources, Energy, Greenhouse Gas Emissions, Land Use and Planning, Noise, Population and Housing, Public Services, Transportation, Tribal Cultural Resources, and Utilities.

1.6.1 Secondary Effects of Mitigation Measures

In accordance with *State CEQA Guidelines* Section 15126.4(a)(1)(D), if any mitigation measure would cause one or more significant effects in addition to those that would be caused by the proposed project, the effects of the mitigation measure shall be discussed. The mitigation measures proposed (as listed on Table 1.B) require the Applicant/Developer to provide the City with lighting, grading, excavation or other construction plans, or provide evidence that the project would adhere to existing programs, regulations, or recommendations in technical reports. The regulations and policies listed in the mitigation measures have been evaluated during their respective adoptions or approval processes. No secondary effects related to the proposed mitigation measures are expected to occur.



Table 1.B: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Regulatory Compliance Measures, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Regulatory Compliance Measures	Level of Significance After Mitigation
<p>4.1: Air Quality</p> <p>Threshold 4.1.1: Would the project conflict with or obstruct implementation of the applicable air quality plan?</p> <p>Significant and Unavoidable Impact. The proposed project would have the potential to conflict or obstruct implementation of applicable air quality plans under Indicator 1 because the proposed project would result in significant and unavoidable long-term operational pollutant emissions. Although there is no feasible mitigation to reduce operational pollutant emissions to a less than significant level, Mitigation Measure AQ-1 would require the implementation of all feasible measures to reduce operational impacts associated with the proposed project. Impacts would be significant and unavoidable.</p>	<p>Mitigation Measure AQ-1: Prior to issuance of building permits, the City of Cypress shall identify project design details and specifications, where feasible, to document implementation and compliance with the following emission reduction measures. Implementation of the following measures, where applicable, are considered to be applicable, feasible, and effective in reducing criteria pollutant emissions generated by the project:</p> <ul style="list-style-type: none"> • All Project Applicants shall incorporate design features (e.g., pollution prevention, pollution reduction, barriers, landscaping, ventilation systems, or other measures) at the proposed residential uses to minimize the potential impacts of air pollution on sensitive receptors. • All Project Applicants shall incorporate fuel-efficient heating equipment and other appliances, such as water heaters, swimming pool heaters, cooking equipment, refrigerators, furnaces, boiler units, and low or zero-emitting architectural coatings. Utilize only Energy Star heating, cooling, and lighting devices, and appliances. • All Project Applicants shall utilize energy-efficient design features, including appropriate site orientation, use of lighter color roofing and building materials, and use of deciduous shade trees and windbreak trees to reduce fuel consumption for heating and cooling. • All Project Applicants shall provide building access and paths which are physically separated from street parking lot traffic and that eliminate physical barriers such as walls, berms, landscaping and slopes that impede the use of pedestrians, bicycle facilities, or public transportation vehicles. • Where feasible, Project Applicants shall link cul-de-sacs and dead-end streets to encourage pedestrian and bicycle travel. • Where feasible, Project Applicants shall provide traffic reduction modifications to Project roads, such as: narrower streets, speed platforms, bulb-outs, and intersection modifications designed to reduce vehicle speeds and to encourage pedestrian and bicycle travel. • All Project Applicants shall provide a display case or kiosk displaying transportation information in a prominent area accessible to employees, residents, or visitors. • All Project Applicants shall display bike route maps, bus schedules, and any other transportation information such as carpooling and car sharing. • All Project Applicants shall provide preferential parking spaces near the entrance of buildings for those who carpool/vanpool/rideshare and provide signage. • Project Applicants shall install 240-volt electrical outlets or Level 3 chargers in parking lots that would enable charging of neighborhood electric vehicles (NEVs) and/or battery powered vehicles. • Project Applicants shall maximize the planting of trees in landscaping and parking lots. <p>Project Applicants shall use light-colored paving and roofing materials.</p>	<p>Significant and Unavoidable Impact.</p>



Table 1.B: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Regulatory Compliance Measures, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Regulatory Compliance Measures	Level of Significance After Mitigation
<p>Threshold 4.1.2: Would the project 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?</p> <p>Significant and Unavoidable Impact. Construction emissions associated with the proposed project would not exceed the SCAQMD thresholds for VOCs, NOx, CO, SO_x, PM_{2.5}, or PM₁₀ emissions. According to SCAQMD guidance, projects that exceed the significance thresholds are considered by SCAQMD to result in cumulatively considerable air quality impacts. Conversely, projects that do not exceed the significance thresholds are generally not considered to result in cumulatively considerable air quality impacts. Therefore, based on the fact that emissions during construction of the proposed project would not exceed any of the air quality significance thresholds for any criteria pollutants, the proposed project would not have a cumulatively considerable air quality impact. Therefore, with compliance with regulatory requirements (as specified in RCM AQ-1 through RCM AQ-4), construction impacts related to the cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under applicable NAAQS or CAAQS would be less than significant, and no mitigation is required.</p> <p>Vehicular trips associated with the proposed project would contribute to congestion at intersections and along roadway segments in the City. The primary mobile-source pollutant of local concern is CO, a direct function of vehicle idling time and, thus, of traffic flow conditions. Given the extremely low level of CO concentrations in the City, and lack of traffic impacts at any intersections, project-related vehicles are not expected to contribute significantly or result in the CO concentrations exceeding the State or federal CO standards. Impacts related to CO hot spots would be less than significant.</p> <p>While Mitigation Measure AQ-1 would significantly reduce criteria air pollutant emissions generated during operational activities associated with the proposed project, there is currently not enough information to quantify emissions of specific project development that may occur under the proposed project. Without quantification to guarantee a less than significant finding, future development projects may still exceed the SCAQMD regional significance thresholds. Therefore, operation of the proposed project would result in a significant impact related to a cumulatively considerable net increase of any criteria pollutant for which the Basin is in nonattainment under an applicable federal or State ambient air quality standard.</p>	<p>Refer to Mitigation Measure MM AQ-1.</p> <p>Regulatory Compliance Measure RCM AQ-1: During clearing, grading, earth moving, or excavation operations, excessive fugitive dust emissions shall be controlled by regular watering or other dust preventative measures by using the following procedures, in compliance with South Coast Air Quality Management District (SCAQMD) Rule 403 during construction. The applicable Rule 403 measures are as follows:</p> <ul style="list-style-type: none"> • Apply nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more). • Water active sites at least twice daily (locations where grading is to occur shall be thoroughly watered prior to earthmoving). • Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 2 feet (0.6 meter) of freeboard (vertical space between the top of the load and the top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114. • Pave construction access roads at least 100 feet (30 meters) onto the site from the main road. • Reduce traffic speeds on all unpaved roads to 15 miles per hour or less. <p>Regulatory Compliance Measure RCM AQ-2: All trucks that are to haul excavated or graded material shall comply with State Vehicle Code Section 23114, with special attention to Sections 23114(b)(F), (e)(2), and (e)(4) as amended, regarding the prevention of such material spilling onto public streets and roads.</p> <p>Regulatory Compliance Measure RCM AQ-3: Prior to approval of future project plans and specifications, the City of Cypress shall confirm that the construction bid packages specify:</p> <ul style="list-style-type: none"> • Contractors shall use high-volume low-pressure paint applicators with a minimum transfer efficiency of at least 50 percent; • Coatings and solvents that will be utilized have a volatile organic compound content lower than required under SCAQMD Rule 1113; and • To the extent feasible, construction/building materials shall be composed of pre-painted materials. <p>Regulatory Compliance Measure RCM AQ-4: Future projects shall comply with SCAQMD Rule 402. Rule 402 prohibits the discharge of air contaminants or other material from any type of operations, which can cause nuisance or annoyance to any considerable number of people or to the public or which endangers the comfort or repose of any such persons, or the public.</p> <p>Regulatory Compliance Measure RCM AQ-5: All future projects shall comply with the latest Energy Code and Title 24 solar requirements for new residential development.</p>	<p>Significant and Unavoidable Impact.</p>
<p>Threshold 4.1.3: Would the project expose sensitive receptors to substantial pollutant concentrations?</p> <p>Less Than Significant Impact. Construction and operation emissions associated with the proposed project would not exceed the localized significance thresholds established by SCAQMD. In order to further reduce construction impacts, the project would comply with emission reduction measures required by the SCAQMD, including SCAQMD Rule 403. With implementation of RCM AQ-1 through RCM AQ-4, the potential health impacts associated with the construction of the proposed project would be less than significant.</p>	<p>Refer to Regulatory Compliance Measure RCMs AQ-1 through AQ-4.</p>	<p>Less Than Significant Impact.</p>
<p>Threshold 4.1.4: Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?</p> <p>Less Than Significant Impact. Residential land uses could result in generation of odors such as exhaust from landscaping equipment. However, unlike odor-generating land uses such as wastewater treatment plants, compost facilities, landfills, solid-waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities, these are not considered potential generators of odor that could affect a substantial number of people. Therefore, impacts from potential odors generated from future housing development associated with the proposed project are considered less than significant.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant Impact.</p>



Table 1.B: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Regulatory Compliance Measures, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Regulatory Compliance Measures	Level of Significance After Mitigation
<p>During construction activities, construction equipment exhaust and application of asphalt and architectural coatings would temporarily generate odors. Any construction-related odor emissions would be temporary and intermittent. Additionally, noxious odors would be confined to the immediate vicinity of the construction equipment and unlikely to affect a substantial number of people. In addition, by the time such emissions reached any sensitive receptor sites, they would be diluted to well below any level of air quality concern. Furthermore, short-term construction-related odors are expected to cease upon the drying or hardening of the odor-producing materials. Therefore, impacts associated with construction-generated odors are considered to be less than significant. Therefore, impacts associated with other emissions (such as those leading to odors) adversely affecting a substantial number of people would be less than significant.</p>		
<p>Cumulative Air Quality Impacts. Significant and Unavoidable Impact. The cumulative impact area for air quality related to the proposed project is the South Coast Air Basin. Air pollution is inherently a cumulative impact measured across an air basin. Construction emissions associated with the proposed project would not exceed the SCAQMD thresholds for VOCs, NO_x, CO, SO_x, PM_{2.5}, or PM₁₀ emissions. However, even with the with implementation of Mitigation Measure AQ-1 and compliance with regulatory requirements through implementation of RCM AQ-1 through RCM AQ-4, operational impacts from criteria pollutant emissions would exceed SCAQMD thresholds, which could hinder the attainment of air quality standards. Therefore, air quality emissions associated with future development that may occur under the proposed project could result in cumulatively considerable impacts, even with implementation of mitigation.</p>	<p>Refer to Regulatory Compliance Measures RCM AQ-1 through AQ-4 and Mitigation Measure MM AQ-1.</p>	<p>Significant and Unavoidable Impact.</p>
4.2: Cultural Resources		
<p>Threshold 4.2.1: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? Less Than Significant Impact. Several of the opportunity sites for residential development identified in the City of Cypress' (City) General Plan 2021–2029 Housing Element overlap with the Los Alamitos Race Course, the essential features of which qualify as a historical resource for the purposes of CEQA. Additionally, several of the opportunity sites contain structures along Lincoln Avenue that are of historic age or could be of historic age upon redevelopment. The proposed project is a programmatic update to the City's General Plan, Lincoln Avenue Specific Plan, CTCC Specific Plan, CBPC Specific Plan, and Zoning Ordinance and would not directly result in physical development. Further, the specific location and configuration of future development at the LARC and Lincoln Avenue opportunity sites has not yet been determined and is not under consideration as part the programmatic update. As such, impacts to historical resources under the proposed project would be less than significant, and no mitigation is required.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant Impact.</p>
<p>Threshold 4.2.2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? Less Than Significant Impact. The opportunity sites associated with the City's General Plan 2021–2029 Housing Element are either presently developed or heavily disturbed, and according to the City of Cypress General Plan Conservation, Open Space and Recreation Element, there are no known archaeological resources located at the opportunity sites. The project has been previously disturbed to construct various structures as well as material stockpiling and storage purposes. Future development would likely include demolition, site preparation/grading activities, during which there is the potential to encounter unknown cultural resources. In the event that historical or archaeological resources are encountered during grading and construction, operations shall cease and Regulatory Compliance Measure (RCM) CUL-1 will be implemented. With the implementation of RCM CUL-1, project impacts to archaeological resources would be less than significant with mitigation incorporated.</p>	<p>Regulatory Compliance Measure RCM CUL-1: In the event that archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified archaeologist from the Orange County List of Qualified Archaeologists has evaluated the find in accordance with federal, State, and local guidelines to determine whether the find constitutes a "unique archaeological resource," as defined in Section 21083.2(g) of the California Public Resources Code (PRC). The Applicant and its construction contractor shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the project site. Any found deposits shall be treated in accordance with federal, State and local guidelines, including those set forth in PRC Section 21083.2. Prior to commencement of grading activities, the Director of the City of Cypress (City) Community Development Department, or designee, shall verify that all project grading and construction plans include specific requirements regarding California PRC (Section 21083.2[g]) and the treatment of archaeological resources as specified above.</p>	<p>Less Than Significant Impact.</p>
<p>Threshold 4.2.3: Would the project disturb any human remains, including those interred outside of dedicated cemeteries? Less Than Significant Impact. No known human remains are present on the project site, and there are no facts or evidence to support the idea that Native Americans or people of European descent are buried on the project site. However, as described previously, buried and undiscovered archaeological remains, including human remains, may be present below the ground surface in portions of the opportunity sites. Disturbing human remains could violate the State's Health and Safety Code, as well as destroy the resource. In the unlikely event that human remains are encountered during future construction, the proper authorities would be notified, and standard procedures for the respectful handling of human remains during the earthmoving activities would be adhered to. Construction contractors are required to adhere to California Code of Regulations (CCR) Section 15064.5(e), Public Resources Code (PRC) Section 5097, and Section 7050.5 of the State's Health and Safety Code. To ensure proper treatment of burials in the event of an unanticipated discovery of a burial, human bone, or suspected human bone, the</p>	<p>Regulatory Compliance Measure RCM CUL-2: In the event that human remains are encountered on the project site, work within 50 feet of the discovery shall be redirected and the County Coroner notified immediately consistent with the requirements of California Code of Regulations (CCR) Section 15064.5(e). State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be Native American, the County Coroner shall notify the Native American Heritage Commission (NAHC), which shall determine and notify a Most Likely Descendant (MLD). With the permission of the property owner, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD may</p>	<p>Less Than Significant Impact.</p>



Table 1.B: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Regulatory Compliance Measures, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Regulatory Compliance Measures	Level of Significance After Mitigation
<p>law requires that all excavation or grading in the vicinity of the find halt immediately, the area of the find be protected, and the contractor immediately notify the County Coroner of the find. The contractor, the Applicant, and the County Coroner are required to comply with the provisions of CCR Section 15064.5(e), PRC Section 5097.98, and Section 7050.5 of the State’s Health and Safety Code. Compliance with these provisions (specified in RCM CUL-2), would ensure that any potential impacts to unknown buried human remains would be less than significant by ensuring appropriate examination, treatment, and protection of human remains as required by State law.</p>	<p>recommend scientific removal and non-destructive analysis of human remains and items associated with Native American burials. Consistent with CCR Section 15064.5(d), if the remains are determined to be Native American and an MLD is notified, the City of Cypress shall consult with the MLD as identified by the NAHC to develop an agreement for treatment and disposition of the remains. Prior to the issuance of grading permits, the Director of the City of Cypress Community Development Department, or designee, shall verify that all grading plans specify the requirements of CCR Section 15064.5(e), State Health and Safety Code Section 7050.5, and PRC Section 5097.98, as stated above.</p>	
<p>Cumulative Cultural Resources Impacts.</p> <p>Less Than Significant Impact. Under the 2045 General Plan build-out assumptions, 1,742 new households could be developed on and around the site of the Los Alamitos Race Course (LARC), the essential features of which were identified in this section’s analysis as a historically significant cultural resource. Because this development is reasonably foreseeable, the loss of the LARC would have the potential to occur regardless of whether or not the proposed project moves forward. Further, as the proposed project does not include any physical development of the LARC, these potential impacts to the LARC would be evaluated on a project-specific basis as future development projects are proposed. Each development proposal received by the City shall be subject to the requirements of CEQA, including an environmental review, if applicable. If there were any potential for significant impacts to cultural resources as a result of reasonably foreseeable development projects in Cypress, an investigation would be required to determine the nature and extent of the resources and to identify appropriate mitigation measures. As such, the proposed project’s contribution to cumulative impacts would be less than significant.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant Impact.</p>
<p>4.3: Energy</p>		
<p>Threshold 4.3.1: Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?</p> <p>Less Than Significant Impact.</p> <p>Construction. The proposed project is estimated to consume 12,540,998.1 gallons of gasoline and 3,993,660.6 gallons of diesel fuel during construction, which would increase the annual construction generated fuel use in Orange County by approximately 0.1 percent for gasoline fuel usage and 0.1 percent for diesel fuel usage. As such, project construction would have a negligible effect on local and regional energy supplies. Furthermore, impacts related to energy use during construction would be temporary and relatively small in comparison to Orange County’s overall use of the State’s available energy resources. It is not expected that future residential development would include any unusual characteristics that would necessitate the use of construction equipment that would be less energy efficient than at comparable construction sites in the region or the State. In addition, construction activities are not anticipated to result in an inefficient use of energy as gasoline and diesel fuel would be supplied by construction contractors who would conserve the use of their supplies to minimize their costs. The proposed project would not cause or result in the need for additional energy facilities or an additional or expanded delivery system. For these reasons, fuel consumption during construction would not be inefficient, wasteful, or unnecessary.</p> <p>Operation. The estimated potential increase in electricity demand associated with the 2,314 additional housing units that would be allowed under the proposed project is 8,482,740.0 kilowatt-hours (kWh) per year, which would negligibly increase the annual natural gas consumption in Orange County by approximately less than 0.1 percent. Electrical and natural gas demand associated with project operations would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. Furthermore, the proposed project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. All future residential development would be required to adhere to all federal, State, and local requirements for energy efficiency, including the latest Title 24 standards.</p> <p>Fuel use associated with the vehicle trips generated by the proposed project is estimated at approximately 920,640.0 gallons of gasoline and 111,188.8 gallons of diesel fuel per year, which would increase the annual fuel use in Orange County by approximately 0.1 percent for gasoline fuel usage and approximately 0.1 percent for diesel fuel usage. Fuel consumption associated with vehicle trips generated by project operations would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region.</p> <p>As such, the buildout of the 2,314 additional housing units that would be allowed under the proposed project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant Impact.</p>



Table 1.B: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Regulatory Compliance Measures, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Regulatory Compliance Measures	Level of Significance After Mitigation
<p>Threshold 4.3.2: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?</p> <p>Less Than Significant Impact. Energy usage during project-related construction activities would be temporary in nature and would be relatively small in comparison to the overall use in the County. In addition, energy usage associated with operation of the proposed project would be relatively small in comparison to the overall use in Orange County, and the State’s available energy resources. Therefore, energy impacts at the regional level would be negligible. Because California’s energy conservation planning actions are conducted at a regional level, and because the proposed project’s total impact on regional energy supplies would be minor, the proposed project would not conflict with or obstruct California’s energy conservation plans as described in the California Energy Commission’s (CEC) Integrated Energy Policy Report. Additionally, the proposed project would not result in the inefficient, wasteful, and unnecessary consumption of energy. Potential impacts related to conflict with or obstruction of a State or local plan for renewable energy or energy efficiency would be less than significant.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant Impact.</p>
<p>Cumulative Energy Impacts.</p> <p>Less Than Significant Impact. Although the proposed project would result in an increase in demand for electricity, this increase would not require SCE to expand or construct infrastructure that could cause substantial environmental impacts. The proposed project, in combination with cumulative development, is well within SCE’s system-wide net annual increase in electricity supplies over the 2018 to 2030 period, and there are sufficient planned electricity supplies in the region for estimated net increases in energy demands. Similarly, additional natural gas infrastructure is not anticipated due to cumulative development. The proposed project’s share of cumulative consumption of natural gas in the SoCalGas service area would be negligible. It is anticipated that SoCalGas would be able to meet the natural gas demand of cumulative development without additional facilities. In addition, both SCE and SoCalGas demand forecasts include the growth contemplated by the proposed project and the other cumulative development within their respective service areas. Increased energy efficiency to comply with building energy efficiency standards would reduce energy consumption on a per-square-foot basis. Furthermore, utility companies are required to increase their renewable energy sources to meet the Renewable Portfolio Standards mandate of 60 percent renewable supplies by 2030. SCE and SoCalGas plan to continue to provide reliable service to their customers and upgrade their distribution systems as necessary to meet future demand. Transportation energy use would also increase; however, this transportation energy use would not represent a major amount of energy use when compared to the amount of existing development and to the total number of vehicle trips and VMT throughout Orange County and the region. The proposed project and cumulative development are required to comply with various federal and State government legislation to improve energy efficiency in buildings, equipment, and appliances, and reduce VMT. As such, the proposed project would not result in an inefficient, wasteful, and unnecessary consumption of energy. Therefore, the proposed project’s contribution to impacts related to the inefficient, wasteful, and unnecessary consumption of energy would not be cumulatively considerable, and no mitigation is required.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant Impact.</p>
4.4 Greenhouse Gas Emissions		
<p>Threshold 4.4.1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?</p> <p>Less Than Significant Impact. The SCAQMD then requires the construction GHG emissions to be amortized over the life of the project, defined as 30 years, added to the operational emissions, and compared to the applicable interim GHG significance threshold tier. The proposed project would generate 64,871 MT CO₂e during construction. When annualized over the 30-year life of the project, annual emissions would be 2,162.4 MT CO₂e. Including construction emissions, the proposed project would result in 15,016.6 MT CO₂e/yr, which would exceed the SCAQMD threshold of 3,000 MT CO₂e/yr. Therefore, consistent with the SCAQMD’s interim guidance, the proposed project was evaluated based on the efficiency-based threshold.</p> <p>Implementation of the proposed project would result in the facilitation of 2,314 additional housing units within the City with a corresponding population increase of 4,605 residents. The proposed project would result in per service population emissions of 3.3 MT CO₂e/yr/SP, which would be below the SCAQMD’s plan-level screening threshold of 4.1 MT CO₂e/yr/SP. Therefore, operation of the proposed project would not generate significant GHG emissions that would have a significant effect on the environment.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant Impact.</p>



Table 1.B: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Regulatory Compliance Measures, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Regulatory Compliance Measures	Level of Significance After Mitigation
<p>Threshold 4.4.2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?</p> <p>Less Than Significant Impact with Mitigation. Applicable plans adopted for the purpose of reducing greenhouse gas emissions include CARB’s Scoping Plan and SCAG’s 2020–2045 RTP/SCS. The proposed project would comply with existing State regulations adopted to achieve the overall GHG emissions reduction goals identified in AB 32, the AB 32 Scoping Plan, Executive Order B-30-15, SB 32, and AB 197 and would be consistent with applicable State plans and programs designed to reduce GHG emissions. Based on the nature of the proposed project, it is anticipated that implementation of the proposed project would not interfere with SCAG’s ability to implement the regional strategies outlined in the RTP/SCS. With implementation of Mitigation Measure GHG-1, the proposed project would not conflict with an adopted plan, policy, or regulation pertaining to GHG emissions, and impacts are considered less than significant with mitigation.</p>	<p>Mitigation Measure MM GHG-1: Prior to discretionary approval by the City of Cypress for residential development projects subject to CEQA (California Environmental Quality Act) review (i.e., nonexempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project-related greenhouse gas (GHG) impacts to the City of Cypress for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology. If project-related GHG emissions exceed applicable SCAQMD thresholds of significance and/or Statewide GHG reduction targets, the City of Cypress shall require that applicants for new development projects incorporate mitigation measures to reduce GHG emissions. Mitigation measures could include, but are not limited, to energy efficiency measures, water conservation and efficiency measures, solid waste measures, and transportation and motor vehicles measures. The identified measures shall be included as part of the conditions of approval.</p>	<p>Less Than Significant Impact.</p>
<p>Cumulative Greenhouse Gas Emissions Impacts.</p> <p>Less Than Significant Impact. The analysis of impacts related to GHG emissions is inherently cumulative. With implementation of Mitigation Measure GHG-1, the proposed project would have no conflict with applicable statewide and regional climate action measures. In addition, as discussed above, the project’s operational-related GHG emissions would not exceed the SCAQMD’s numeric threshold. GHG emissions impacts associated with the proposed project would be less than significant, and therefore the cumulative impact would also be less than significant with mitigation incorporated.</p>	<p>Refer to Mitigation Measure MM GHG-1.</p>	<p>Less Than Significant Impact.</p>
<p>4.5: Land Use and Planning</p>		
<p>Threshold 4.5.1: Would the project physically divide an established community?</p> <p>Less Than Significant Impact. Implementation of the City of Cypress’ (City) General Plan 2019–2029 Housing Element update and rezoning program would result in changes in land use in some cases, as described in Chapter 3.0 of the Draft EIR, Project Description. These changes would occur on the Lincoln Avenue and Katella Avenue opportunity sites described in the Draft Housing Element. As these areas are currently urbanized, the proposed project would not physically divide an established community. Therefore, project impact is less than significant. No mitigation is necessary.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant Impact.</p>
<p>Threshold 4.5.2: Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect</p> <p>Less Than Significant Impact. As described in Chapter 3.0, Project Description, the proposed project would include rezoning of sites to allow higher densities than are allowed under current designations, and would amend the General Plan, Zoning Ordinances, and the Specific Plans as needed to align with this change and other aspects of the updated 2021–2029 City General Plan Housing Element. Therefore, any existing land use policies that are not already consistent with the proposed project would be amended accordingly, eliminating any possible land use conflicts. With adoption of the Housing Element Update and the necessary conforming changes to land use designations, zoning, and Specific Plans, the project would create consistency between the 2021–2029 General Plan Housing Element Update and applicable City land use and planning policies. Additionally, any future projects implemented in accordance with the proposed zoning changes would be reviewed against applicable land use policies as a part of the future development review process. Therefore, the proposed project would result in less than significant impacts related to potential conflicts with applicable land use plans, policies, and regulations, and no mitigation is required.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant Impact.</p>
<p>Cumulative Land Use and Planning Impacts.</p> <p>Less Than Significant Impact. The proposed project would not physically divide an established community because land use changes proposed within the City are intended to tie into the existing uses and surrounding neighborhoods. Development would occur within existing areas of development, which is not expected to divide an established community. The proposed project would not result in a significant impact with respect to consistency with the General Plan, Zoning Ordinance, or Specific Plans because the project would include necessary document amendments to ensure consistency. These changes would not have cumulative impacts because they are administrative actions to properly reflect existing uses. Any future projects implemented in accordance with the proposed zoning changes and updated land use designations would be required to adhere to all applicable development policies and guidelines. Because the City’s General Plan 2045 buildout assumption is already anticipated and accounted for in the City’s General Plan, implementation of the City of Cypress Housing Element Update would not contribute to a cumulative effect due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Consequently, the cumulative impact would be less than significant.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant Impact.</p>



Table 1.B: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Regulatory Compliance Measures, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Regulatory Compliance Measures	Level of Significance After Mitigation
4.6: Noise		
<p>Threshold 4.6.1: Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?</p> <p>Less Than Significant Impact. Many of the opportunity sites are adjacent to primary noise sources within the City (major roadways). The provision of additional housing units could result in noise-sensitive land uses being located within or adjacent to noise contours above 60 CNEL. However, any new construction would need to be consistent with the General Plan Noise Element. The anticipated change in traffic volumes associated with the proposed project would result in traffic noise increases of up to 0.2 dBA, which is considered less than the threshold of perceptibility for humans (i.e., 3 dBA). Therefore, traffic noise regulated under the proposed project would not be readily perceptible in a suburban outdoor environment. Therefore, implementation of the proposed project would not allow the exposure of persons to noise levels in excess of applicable standards, and impacts would be less than significant.</p>	No mitigation is required.	Less Than Significant Impact.
<p>Threshold 4.6.2: Would the project result in generation of excessive groundborne vibration or groundborne noise levels?</p> <p>Less Than Significant Impact. The proposed project would allow for the development of 1,946 additional housing units (504 of which have already been entitled) on the opportunity sites and would not generate vibration. In addition, vibration levels generated from project-related traffic on the adjacent roadways would be highly unusual for on-road vehicles because the rubber tires and suspension systems of on-road vehicles provide vibration isolation. Therefore, vibration generated by project-related traffic on the adjacent roadways would be less than significant.</p>	No mitigation is required.	Less Than Significant Impact.
<p>Cumulative Noise Impacts.</p> <p>Less Than Significant Impact. The proposed project would not directly result in physical development. Additionally, the updates to these plans are proposed to accurately reflect existing uses and not generate additional traffic or additional noise. Any future projects implemented in accordance with the proposed rezoning and updated land use designations would be required to adhere to the General Plan Noise Element and comply with applicable development regulations. Therefore, the impacts from the proposed project are not considered to be cumulatively considerable.</p>	No mitigation is required.	Less Than Significant Impact.
4.7: Population and Housing		
<p>Threshold 4.7.1: Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?</p> <p>Less Than Significant Impact. Although the proposed project would facilitate the development of new housing in the City, the new housing would not induce substantial unplanned population growth as the proposed project is designed to meet the City's housing need allocation for the planning period between 2021 and 2029 of 3,936 units as determined by the SCAG RHNA. As such, the proposed project is consistent with planned regional housing growth and planned population growth of the City as evaluated in the SCAG RHNA. In addition, the opportunity sites are located in urbanized settings with a full range of public services and utilities. As such, the proposed project would not cause indirect substantial unplanned population growth through the extension of roads and other infrastructure. Impacts associated with unplanned population growth, directly or indirectly, would be less than significant.</p>	No mitigation is required.	Less Than Significant Impact.
<p>Cumulative Population and Housing Impacts.</p> <p>Less Than Significant Impact. Implementation of the proposed project in conjunction with the buildout of the households under the baseline General Plan buildout scenario could result in cumulatively significant population increases. However, future development allowed under the proposed project would accommodate planned regional housing growth included in the SCAG RHNA. In addition, future projects implemented in accordance with the proposed project, as well as the remaining development associated with the City's General Plan 2045 build-out assumptions, would be required to adhere to the General Plan, provide required development impact fees, and comply with applicable development regulations. Therefore, the impacts from the proposed project are not considered to be cumulatively considerable.</p>	No mitigation is required.	Less Than Significant Impact.
4.8: Public Services		
<p>Threshold 4.8.1(i): Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?</p> <p>Less Than Significant Impact. Implementation of the proposed project would increase the population served by the OCFA by 0.2 percent. This increase in population served by OCFA is negligible (less than 1 percent and would not impact OCFA's ability</p>	<p>Regulatory Compliance Measure RCM PS-1: Any future projects implemented in accordance with the proposed project would be required to coordinate with OCFA to determine the appropriate development impact fees required in order to offset potential impact to OCFA staffing and service ability. Prior to the approval of a future project implemented in accordance with the proposed project, the designated site developer shall enter into a Secured Fire Protection Agreement with OCFA that details the agreed-upon development impact fees</p>	Less Than Significant Impact.



Table 1.B: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Regulatory Compliance Measures, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Regulatory Compliance Measures	Level of Significance After Mitigation
<p>to serve the City. Any future housing projects implemented in accordance with the proposed project would be required to adhere to all OCFA requirements, including providing adequate fire flow/structure protection to the opportunity sites, hydrants spaced to meet the minimums identified in the fire code, and providing adequate access for emergency vehicles Any future development projects would be required to obtain City approval of building plans prior to issuance of building permits and would be required to demonstrate during the development review process that fire service providers would be able to provide adequate fire protection through building design requirements and access. Further, all future projects implemented in accordance with the proposed project would be subject to additional CEQA review related to specific development applications. Further, adherence to Standard Condition PS-1 would be required to coordinate with OCFA to determine the appropriate development impact fees required for the project in order to offset potential impact to OCFA staffing and service ability. Therefore, impacts on fire protection services would be less than significant and no mitigation is required.</p>	<p>required for the project.</p>	
<p>Threshold 4.8.1(ii): Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?</p> <p>Less Than Significant Impact. Implementation of the proposed project would result in an officer-to-resident ratio of 1.0 CPD officer per 1,000 residents, which is consistent with the officer-to-resident ratio of the City since 2019. Although the proposed project would likely result in an increase in calls to law enforcement within the City due to the population increase associated with the construction of 2,314 additional housing units, CPD has confirmed that it anticipates hiring additional officers in order to adequately serve future population growth in the City, including the population increase associated with the proposed project. In addition, CPD has confirmed that it has adequate facilities to accommodate additional officers. Any future housing projects implemented in accordance with the proposed project would be required to adhere to all applicable policies and codes related to the provision of police services. Any future development projects would be required to obtain City approval of building plans prior to issuance of building permits and would be required to demonstrate during the development review process that law enforcement providers would be able to provide adequate police protection services. Future housing projects at the opportunity sites would be subject to additional CEQA review related to specific development applications. Therefore, impacts on police protection services would be less than significant</p>	<p>No mitigation is required.</p>	<p>Less Than Significant Impact.</p>
<p>Threshold 4.8.1(iii): Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?</p> <p>Less Than Significant Impact. Implementation of the proposed project would result in approximately 547 additional students in the CSD, 25 in the CESD, 64 students in the LOSAL (46 elementary school students and 18 middle/high school students), and 429 students in the AUHSD. The increase in students as a result of project implementation would increase the demand for school facilities. However, future development allowed under the proposed project would accommodate planned regional housing growth included in the SCAG RHNA, which is based on population estimates, including school-aged children, for the City. Therefore, although implementation of the proposed project would facilitate an increase in demand for school facilities, this increase in demand is consistent with the increase in the City’s population. In addition, pursuant to the provisions of Government Code Section 65996, a project’s impact on school facilities is fully mitigated through payment of the requisite school facility development fees current at the time a building permit is issued. Therefore, with payment of the required fees, as outlined in Regulatory Compliance Measure PS-2, potential impacts to school services and facilities associated with implementation of the proposed project would be less than significant.</p>	<p>Regulatory Compliance Measure RCM PS-2: Payment of School Fees. Prior to issuance of any building permits, the Applicant/Developer of future residential development projects facilitated by the proposed project shall provide proof to the Director of the City of Cypress Community Development Department, or designee, that payment of school fees to the appropriate school districts have been made in compliance with Section 65995 of the California Government Code.</p>	
<p>Cumulative Public Services Impacts.</p> <p>Less Than Significant Impact. Implementation of the proposed project in conjunction with the buildout of the additional households could result in a cumulatively significant impact to public services within the City. However, developers of future residential development projects implemented in accordance with the proposed project, as well as the remaining development associated with the City’s General Plan 2045 build-out assumptions, would be required to analyze potential impacts to public services and pay their fair share of development impact fees. Therefore, the impacts from the proposed project on public services are not considered to be cumulatively considerable.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant Impact.</p>



Table 1.B: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Regulatory Compliance Measures, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Regulatory Compliance Measures	Level of Significance After Mitigation
4.9: Transportation		
<p>Threshold 4.9.1: Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?</p> <p>Less Than Significant Impact. Based on the significance threshold criteria determined by the City of Cypress, no operational deficiencies would occur at any of the studied intersections under the General Plan Buildout (2045) conditions with implementation of the proposed project. All intersections would operate at an acceptable LOS (D or better) and intersections along Valley View Street, Lincoln Avenue, and Katella Avenue would also operate at an acceptable LOS (E or better). In addition, based on VMT analysis results, implementation of the proposed project would not exceed the threshold based on service population. Therefore, LOS and VMT analyses showed that the proposed project would not exceed significance thresholds established by the City of Cypress and County of Orange. Therefore, the proposed project would have a less than significant impact on transportation.</p>	No mitigation is required.	Less Than Significant Impact.
<p>Threshold 4.9.2: Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?</p> <p>Less Than Significant Impact. According to <i>State CEQA Guidelines</i> Section 15064.3(a), project-related transportation impacts are generally best measured by evaluating the project’s VMT, which refers to the amount and distance of automobile travel attributable to a project. The proposed project would result in a significant impact related to VMT if the cumulative citywide VMT per service population is higher than Orange County’s baseline VMT per service population. As shown in Table 4.9.E, under general build-out conditions in the year 2045, the VMT under the proposed project scenario would not exceed Orange County’s threshold. See Threshold 4.9.1 above for a discussion of the proposed project’s VMT impacts. The project would have a less than significant transportation impact.</p>	No mitigation is required.	Less Than Significant Impact.
<p>Cumulative Transportation Impacts.</p> <p>Less Than Significant Impact. Detailed LOS and VMT analyses were conducted for the proposed project based on the OCTAM model, using the County of Orange as the region. Based on the significance threshold criteria determined by the City of Cypress, no operational deficiencies would occur at any of the studied intersections under the General Plan Build-out (2045) conditions with implementation of the proposed project. Based on the significance threshold criteria determined by the County of Orange, the cumulative citywide VMT per service population would be lower than the regional threshold. Therefore, the proposed project would have a less than significant transportation impact. Additionally, compliance with the City’s Municipal Code will address transportation design and emergency access. Impacts from the proposed project would not be considered cumulatively considerable.</p>	No mitigation is required.	Less Than Significant Impact.
4.10: Tribal Cultural Resources		
<p>Threshold 4.10.1: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?</p> <p>Less Than Significant Impact. No tribal archaeological resources have been previously recorded within or in the vicinity of any of the proposed opportunity sites, and none were discovered as a result of the records searches conducted for properties on and adjacent to the sites. Native American consultations were conducted in compliance with SB 18 and AB 52. As part of these consultations, the City asked the NAHC to conduct a record search of the Sacred Lands File (SLF) to identify known tribal cultural resources, which yielded negative results. No information regarding specific known tribal cultural resources on the project site was provided by any of the Native American Tribes contacted as part of the AB 52 and SB 18 process for the proposed project. Therefore, no tribal cultural resources listed or eligible for listing in the California Register of Historical Resources (California Register) or in a local register exist within the project area, and there are no known tribal cultural resources on the project site. The proposed project would have less than significant impacts pertaining to a substantial adverse change in the significance of a tribal cultural resource defined as a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is listed or eligible for listing in the California Register of or in a local register of historical resources as defined in PRC Section 5020.1(k), and no mitigation is required.</p>	No mitigation is required.	Less Than Significant Impact.



Table 1.B: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Regulatory Compliance Measures, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Regulatory Compliance Measures	Level of Significance After Mitigation
<p>Threshold 4.10.2: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p> <p>Less Than Significant Impact. Native American consultation for the proposed project was conducted in compliance with SB 18 and AB 52. As part of these consultations, review of the SLF by the NAHC yielded negative results. Subsequently, Native American representatives were contacted by the City to determine their desire to consult on the proposed project. Because the Tribal outreach process yielded no knowledge of significant Tribal resources, it can reasonably be assumed that the proposed project would not 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.</p> <p>Because future development of the project’s opportunity sites could require excavation and other potentially disturbing aspects of construction into soils, there is a potential to uncover undiscovered tribal cultural resources during excavation, including human remains. Regulatory Compliance Measure CUL-1 sets forth requirements for the treatment of unearthed archaeological resources. Regulatory Compliance Measure CUL-2 requires compliance with the State’s Health and Safety Code for the treatment of human remains. The proposed project would be required to adhere to these Regulatory Compliance Measures. Impacts of the impact of the proposed project to previously unknown deposits with tribal cultural significance or previously undiscovered human remains would be less than significant.</p>	<p>Refer to Regulatory Compliance Measures RCMs CUL-1 and CUL-2.</p>	<p>Less Than Significant Impact.</p>
<p>Cumulative Tribal Cultural Resources Impacts.</p> <p>Less Than Significant Impact. The proposed project would result in less than significant impacts to known and unknown tribal cultural resources listed or eligible for listing in the California Register of Historical Resources, in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or otherwise determined by the lead agency to be significant. Further, each individual development proposal received by the City is required to undergo individual environmental review pursuant to CEQA, including SB 18 and AB 52 outreach. Impacts of other projects on tribal cultural resources are generally site-specific resulting from ground disturbing activities, which would require unique impact analysis to determine the nature and extent of the resources and identify appropriate mitigation measures that would reduce or avoid significant impacts. Additionally, when resources can be assessed and/or protected as they are discovered, impacts to these resources are less than significant. As such, adherence to the regulatory standards in Regulatory Compliance Measure CUL-1 and CUL-2 would ensure that the proposed project, together with the related projects, would result in less than significant cumulative impacts to tribal cultural resources.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant Impact.</p>
4.11: Utilities and Service System		
<p>Threshold 4.11.1: Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?</p> <p>Less Than Significant Impact.</p> <p>Water. Future residential development facilitated by the proposed project would result in approximately 86,834,354 gallons per year (gpy) or 267 af per year (afy) of indoor water use. The proposed project’s anticipated water usage accounts for 1.7 percent of the estimated water demand and 1.1 percent of the total available water supplies in the service area for 2045. This represents a minimal increase in water demand within the GSWC Los Alamitos West Orange Service Area. Additionally, some of the 2,314 units would replace existing urban uses that currently use water. Any future projects implemented in accordance with the proposed project would be required to adhere to the General Plan, provide required development impact fees, and comply with applicable development regulations pertaining to water. As a part of the development review process, all future projects would be required to demonstrate that existing public utilities would be sufficient to serve the future projects’ needs. As such, the proposed project would not require the relocation or construction of new or expanded water facilities or infrastructure and impacts would be less than significant.</p> <p>Wastewater. The proposed project is anticipated to generate approximately 240 af of wastewater annually, or 214,116 gallons of wastewater per day. This accounts for 0.11 percent of OCSD’s daily capacity, 0.10 percent of the current capacity of Reclamation Plant No. 1, and 0.13 percent of the current capacity of Reclamation Plant No. 2. Consequently, anticipated</p>	<p>No mitigation is required.</p>	<p>Less Than Significant Impact.</p>



Table 1.B: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Regulatory Compliance Measures, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Regulatory Compliance Measures	Level of Significance After Mitigation
<p>wastewater generation by the proposed project is negligible (less than 1 percent) compared to the available capacities of OCS&D, Reclamation Plant No. 1, and Treatment Plant No. 2. Additionally, some of the 2,314 units would replace existing urban uses that currently consume water and are assumed in the water use projections. Any future projects implemented in accordance with the proposed project would be required to adhere to the General Plan, provide required development impact fees, and comply with applicable development regulations pertaining to wastewater treatment. As a part of the development review process, all future projects would be required to demonstrate that existing public utilities would be sufficient to serve the future projects' needs. In addition, as requested by OCS&D, future projects implemented in accordance with the proposed project would be required to provide project-specific impact analysis via sewer study to demonstrate the adequacy of existing wastewater facilities to properly transport and treat wastewater flows generated by the future project. As such, the proposed project would not require the relocation or construction of new or expanded wastewater facilities or infrastructure and impacts would be less than significant.</p> <p>Stormwater/Drainage. Any future projects implemented in accordance with the proposed project which disturbs more than 1 acre of soil would comply with the requirements of the Construction General Permit and would include the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP). If a project would disturb less than 1 acre of soil, it would be subject to the requirements of Section 5.106 of the 2019 California Green Building Standards Code (CALGreen Code). The new development allowed under the proposed project would also comply with the Orange County MS4 Permit, which requires the preparation of a Final WQMP and implementation of operational BMPs to target and reduce pollutants of concern in stormwater runoff from project sites. Compliance with the Orange County MS4 Permit would reduce operational impacts related to surface water quality standards, waste discharge requirements, and/or degradation of water quality to a less than significant level, and no mitigation is required. Additionally, some of the 2,314 units would replace existing urban uses that currently contribute to stormwater flows and given that existing urban uses are probably older structures and not built to current stormwater standards there could be a net benefit. Any future projects implemented in accordance with the proposed project would be required to adhere to the General Plan, provide required development impact fees, and comply with applicable development regulations pertaining to stormwater drainage. As a part of the development review process, all future projects would be required to demonstrate that existing public utilities would be sufficient to serve the future projects' needs. As such, the proposed project would not require the relocation or construction of new or expanded stormwater facilities or infrastructure and impacts would be less than significant.</p> <p>Electric Power. The estimated electricity demand associated with the operation of the new residential development allowed under the proposed project is approximately 8,482,740 kilowatt-hours (kWh) per year. Therefore, operation of the future residential development facilitated by the proposed project would increase annual electricity consumption in the SEC service area and Orange County by approximately 0.01 and 0.04 percent, respectively. Consequently, anticipated electricity consumption by the proposed project is negligible (less than 1 percent) compared to the total consumption of the SCE service area and Orange County. Additionally, some of the 2,314 units would replace existing urban uses that are older structures not built to current Title 24 Energy Efficiency Standards, all of which consume electricity, thereby likely decreasing any net gain in electricity consumption. Any future projects implemented in accordance with the proposed project would be required to adhere to the General Plan, provide required development impact fees, and comply with applicable development regulations pertaining to electric power. As a part of the development review process, all future projects would be required to demonstrate that existing public utilities would be sufficient to serve the future projects' needs. As such, the proposed project would not require the relocation or construction of new or expanded electrical facilities or infrastructure and impacts would be less than significant.</p> <p>Natural Gas. The estimated potential increase in natural gas demand at the opportunity sites is anticipated to be approximately 25,701,324 KBTU per year, or approximately 257,075 therms per year. Therefore, operation of the new residential development allowed under the proposed project would increase annual consumption in the SoCalGas service area and Orange County by approximately 0.005 and 0.04 percent, respectively. Consequently, anticipated natural gas consumption by the proposed project is negligible (less than 1 percent) compared to the total consumption of the SoCalGas service area and Orange County. The proposed project would not require the construction of any physical improvements related to the provision of natural gas service that would result in significant environmental impact. Additionally, some of the 2,314 units would replace existing urban uses that are older structures not built to current Title 24 Energy Efficiency Standards, several of which consume natural gas, thereby likely decreasing the net gain in natural gas consumption. Any future projects implemented in accordance with the proposed project would be required to adhere to the General Plan, provide required development impact fees, and comply with applicable development regulations pertaining to natural gas. As a part of the development review process, all future projects would be required to demonstrate that existing public utilities would be sufficient to serve the future projects' needs. As such, the proposed project would not require the relocation or construction of</p>		



Table 1.B: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Regulatory Compliance Measures, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Regulatory Compliance Measures	Level of Significance After Mitigation
<p>new or expanded natural gas facilities or infrastructure and impacts would be less than significant.</p> <p>Telecommunication Facilities. Any future projects that would be developed in accordance with the proposed project would be responsible for constructing adequate tele-communication facility extensions on their respective project sites. The construction and expansion of these facilities would occur on site during the site preparation and earthwork phase and are not expected to impact any telephone, cable, or internet services offsite that serve the surrounding areas. Additionally, telecommunication facilities are generally installed concurrently with utility expansions and impacts associated with the expansion of telecommunications facilities are already considered in the air quality, noise, and construction traffic analysis. Therefore, the project impacts associated with the relocation or construction of new or expanded telecommunication facilities and impacts would be less than significant.</p>		
<p>Threshold 4.11.2: Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?</p> <p>Less Than Significant Impact. The estimated increase in water demand associated with the new development proposed as part of the project would represent approximately 1.7 percent of the GSWC’s anticipated water demand in 2045. Additionally, some of the 2,314 housing units that would be accommodated with implementation of the proposed project would replace existing uses that currently are assumed in the water use projections. The project-generated increase in water demand would be considered less than significant and would fall within existing capacity and available supply. According to the 2020 UWMP, GSWC’s available water supply would meet the future projected demand for normal year demands from 2025 through 2045. Development of the residential units facilitated by the proposed project are anticipated to use 1.1 percent of the total available water supplies in the service area for 2045. This represents a minimal increase in water demand within the GSWC West Orange Service Area. Therefore, the proposed project would not result in insufficient water supplies during normal, dry, and multiple dry years, and adequate water supply would be available to accommodate the future residential development on the opportunity sites facilitated by the proposed project. The proposed project would increase demand for water supplies; however, the GSWC would have sufficient water supplies to serve the proposed project. Therefore, the proposed project would result in less than significant impacts related to water supplies.</p>	No mitigation is required.	Less Than Significant Impact.
<p>Threshold 4.11.3: Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?</p> <p>Less Than Significant Impact. The proposed project is anticipated to generate 214,116 gpd of wastewater. However, the 214,116 gpd of wastewater generated by the proposed project would only represent a small fraction of the primary daily treatment capacity of Reclamation Plant No. 1 and Reclamation Plant No. 2 (0.10 percent and 0.13 percent, respectively). Additionally, through its Capital Improvement Program, the OCSD strives to continue maintaining its facilities at optimal levels by planning, designing, and preparing for future demand by developing Facilities and Biosolids Master Plans that address 20-year planning horizons. Through these long-range planning activities, the OCSD would be able to accommodate the growth in demand for wastewater treatment generated by the proposed project and other projects in its service area. Therefore, the proposed project would not result in a significant contribution to the capacity of Reclamation Plant No. 1 or Treatment Plant No. 2. Additionally, fees required by the OCSD would sufficiently offset potential impacts generated by the proposed project. Furthermore, some the 2,314 units would replace existing urban uses that currently generate wastewater. Therefore, the proposed project would result in less than significant impacts related to the wastewater treatment capacity.</p>	No mitigation is required.	Less Than Significant Impact.
<p>Threshold 4.11.4: Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?</p> <p>Less Than Significant Impact. The additional solid waste generation of 1,711 tons of solid waste per year, or 4.69 tpd, facilitated by the proposed project represents 0.04 percent, 0.06 percent, and 0.1 percent of the daily permitted tonnage of the Frank R. Bowerman Landfill, Olinda Alpha Landfill, and Prima Deshecha Landfill, respectively. Consequently, anticipated solid waste generation by the proposed project is negligible (less than 1 percent) compared to the total amount of solid waste received by the three landfills. The proposed project would not require the construction of any physical improvements related to the provision of solid waste disposal that would result in significant environmental impact and the OCWR solid waste disposal system would have adequate capacity to serve the proposed project. Furthermore, some of the 2,314 housing units would replace existing urban uses, most of which currently generate solid waste. Therefore, impacts related to solid waste generation from any future projects developed in accordance with the proposed project would be less than significant.</p>	No mitigation is required.	Less Than Significant Impact.



Table 1.B: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Regulatory Compliance Measures, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Regulatory Compliance Measures	Level of Significance After Mitigation
<p>Cumulative Utilities and Service Systems Impacts.</p> <p>Less Than Significant Impact. Implementation of the proposed project in conjunction with the buildout of the additional households could result in cumulatively significant impact to utility facilities and capacity. However, developers of future residential development projects implemented in accordance with the proposed project, as well as the remaining projects associated with the City’s General Plan 2045 build-out assumptions, would be required to analyze potential impacts to utilities systems, ensure that utility providers would have adequate capacity and supply to serve the residential projects as well as existing conditions, and would be required to comply with existing and future statutes and regulations, including waste diversion programs mandated by City, State, and federal law. Therefore, the impacts from the proposed project would not be considered cumulatively considerable.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant Impact.</p>



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2.0 INTRODUCTION

This Environmental Impact Report (EIR) has been prepared to evaluate environmental impacts associated with the proposed 2021–2029 Cypress Housing Element Implementation Project (proposed project) in Cypress, California. The City of Cypress (City) is the “public agency which has the principal responsibility for carrying out or approving the project”¹ and, as such, is the “Lead Agency” for the proposed project under the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.). CEQA requires the Lead Agency to consider the information contained in the EIR prior to taking any discretionary action on the proposed project. This EIR is intended to serve as an informational document to be considered by the City and any Responsible Agencies during deliberations on the proposed project. CEQA Section 21069 defines a “Responsible Agency” as a public agency other than the Lead Agency that has responsibility for carrying out or approving a project. The approvals and permits associated with the proposed project are described in Chapter 3.0, Project Description.

The City, as Lead Agency, determined that the proposed project may have a significant effect on the environment and that an EIR would be required to more fully evaluate potential adverse environmental impacts that may result from development of the proposed project. As a result, this EIR has been prepared in accordance with CEQA and the *State CEQA Guidelines* (California Code of Regulations [CCR], Title 14, Section 15000 et seq.). This EIR also complies with the procedures established by the City for the implementation of CEQA.

Questions regarding the preparation of this document and City review of the proposed project should be referred to the following person:

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2.1 PURPOSE AND TYPE OF EIR/USES OF THE EIR

This EIR has been prepared to evaluate potential environmental impacts that could result from implementation of the proposed project. As the Lead Agency, the City has the principal responsibility for approving the proposed project. In that capacity, the City has decided to prepare this EIR and, after the public review process, will decide whether to certify the Final EIR.

The City and any Responsible Agencies have the authority to make decisions on discretionary actions relating to development of the proposed project. As stated previously, this EIR is intended to serve as an informational document to be considered by the City and Responsible Agencies during deliberations on the proposed project. No Responsible Agencies have been identified for this project. This EIR evaluates a reasonable worst-case scenario of potential impacts associated with the

¹ As defined in Public Resources Code Section 21067.



proposed project and identifies feasible mitigation and alternatives for any identified potentially significant impacts.

This EIR will serve as a Program EIR (PEIR) pursuant to *State CEQA Guidelines* Section 15168. According to Section 15168 of the *State CEQA Guidelines*, a Program EIR may be prepared for a series of actions that are related geographically, as logical parts in a chain of contemplated actions, or in connection with the issuance of plans that govern the conduct of a continuing program (per CEQA Guidelines, Section 15168(a)). The advantages of a PEIR include the ability to provide a more exhaustive consideration of alternatives and cumulative effects than might be possible in a single project-specific EIR; to avoid duplication of basic policy considerations; provide the lead agency with the ability to consider broad program-wide policies and mitigation measures that would apply to specific projects or later activities within the overall program (CEQA Guidelines, Section 15168 (b)); and use the PEIR when examining later activities to determine whether an additional environmental document must be prepared (CEQA Guidelines, Section 15168(c)). If a later activity is found to be within the scope of the PEIR, no further environmental documents would be required.

As the Lead Agency for the proposed project under CEQA, the City must consider the information contained in the Final EIR prior to taking any discretionary action with respect to the proposed project. This PEIR provides information to the Lead Agency and other public agencies, the general public, and decision-makers regarding the potential environmental impacts from construction and operation of the proposed project. The purpose of the public review of this PEIR is to evaluate the adequacy of the environmental analysis in terms of compliance with CEQA. *State CEQA Guidelines* Section 15151 states the following regarding the standards from which adequacy is judged:

“An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among experts. The courts have not looked for perfection but for adequacy, completeness, and a good faith effort at full disclosure.”

Public Resources Code Section 21002.1(a) states:

“The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.”

An EIR is the most comprehensive form of environmental documentation identified in CEQA and the *State CEQA Guidelines* and provides the information needed to assess the environmental consequences of a proposed project. EIRs are intended to provide an objective, factually supported, full-disclosure analysis of the environmental consequences associated with a proposed project that has the potential to result in significant, adverse environmental impacts.



2.2 PUBLIC REVIEW PROCESS

In compliance with CEQA and the *State CEQA Guidelines*, the City has taken steps to promote opportunities for the public and other public agencies to participate in the environmental review process. The City conducted the scoping process and held a public scoping meeting, prepared an IS, issued a Notice of Preparation (NOP) for the proposed project, and determined that an EIR was required to evaluate the potentially significant environmental effects of the proposed project and related actions. Further, this Draft PEIR is subject to public review and comment. These topics related to the environmental review process are described in further detail below.

2.2.1 Initial Study and Notice of Preparation

The City, as the Lead Agency, issued an NOP for the EIR on April 21, 2023, which was distributed via the State Clearinghouse (SCH). The SCH issued a project number for the EIR (SCH No.2023040560). The primary purpose of preparing the IS was to scope the environmental analysis and evaluate potential environmental impacts that may result from project approval. The IS was also used to scope out environmental issues that were determined to be “less than significant” or “no impact.” The IS is attached as Appendix A to this PEIR.

In accordance with the *State CEQA Guidelines*, Section 15082, the NOP was circulated to responsible agencies and individuals for a period of 30 days, during which time written comments were solicited pertaining to environmental issues and topics that the EIR should evaluate.

Responses to the NOP were received from the following agency:

- California Department of Transportation (Caltrans) District 12

2.2.2 Scoping Meeting

The City held a public scoping meeting to present the original project and to solicit input from interested individuals regarding environmental issues that should be addressed in the Draft EIR. The in-person scoping meeting was held on May 2, 2023. No environmental issues or concerns were raised at the scoping meeting. Appendix A includes copies of written comments received in response to the NOP.

2.2.3 Areas of Controversy

Issues and concerns raised in response to the NOP or at the scoping meeting included:

- Comments from California Department of Transportation (Caltrans) District 12 regarding: traffic impact study, transportation planning, system planning, active transportation planning, goods movement and encroachment permit.

This is not an exhaustive list of areas of controversy, but rather key issues that were raised during the scoping process. This PEIR addresses each of these areas of concern or controversy in detail, examines project-related and cumulative environmental impacts, identifies significant adverse environmental impacts, and proposes mitigation measures and/or alternatives designed to reduce



or eliminate potentially significant impacts. Appendix A to this PEIR includes the NOP and IS. Appendix A also includes a copy of the written comment letters received in response to the NOP.

2.2.4 EIR Public Review Period

This PEIR is being distributed to numerous public agencies and other interested parties for review and comment. This PEIR is also available at the following locations and on the City’s website for the proposed project (add website location):

City of Cypress Community Development Department 5275 Orange Avenue Cypress, CA 90630	Cypress Branch Library 5331 Orange Avenue Cypress, CA 90630
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All comments received from agencies and individuals on this PEIR will be accepted during the public comment period, which will not be less than 45 days, in compliance with CEQA and the *State CEQA Guidelines*. All comments on this EIR should be sent to the following City contact person:

Alicia Velasco, Planning Director
City of Cypress Community Development Department
5275 Orange Avenue
Cypress, CA 90630
Email: avelasco@cypressca.org

Following the close of the public comment period, the City will prepare written responses to all written comments received during the public comment period and will compile these comments and responses, together with any text changes to this PEIR, into a Final EIR that includes all of the information required pursuant to *State CEQA Guidelines* Section 15132. The Final EIR will be provided to all public agencies that submitted comments on this PEIR at least 10 days prior to certification of the Final EIR. The Final EIR shall consist of the EIR or a revision of the draft; comments and recommendations received on the EIR either verbatim or in summary; a list of persons, organizations, and public agencies commenting on the EIR; the response of the City to significant environmental points raised in the review and consultation process and in comments submitted on the Draft EIR; and any other information added by the City.

The City will make findings regarding the extent and nature of the impacts as presented in the Final EIR. The Final EIR must be certified as complete by the City Council prior to making a decision on the requested entitlements for the proposed project. Public input is encouraged at all public hearings regarding the proposed project.

2.3 SCOPE OF THIS EIR

As required by *State CEQA Guidelines* Section 15128, this PEIR must identify the effects of the proposed project that are determined to be significant. Environmental topics addressed in this EIR include: Air Quality; Cultural Resources; Energy, Greenhouse Gas Emissions; Land Use and Planning; Noise; Population and Housing; Public Services; Transportation; Tribal Cultural Resources; and Utilities and Service Systems.



2.4 FORMAT OF THE EIR

This PEIR contains the information and analysis required by CEQA and the *State CEQA Guidelines*, including Section 15122–15131, and is generally organized as follows:

- **Chapter 1.0: Executive Summary.** Chapter 1.0 contains the Executive Summary of this EIR, which lists all significant project impacts, feasible mitigation measures that have been recommended to reduce any significant impacts of the proposed project, and the level of significance of each impact following feasible mitigation. The summary is presented in a table format.
- **Chapter 2.0: Introduction.** Chapter 2.0 contains a discussion of the purpose and intended use of this EIR.
- **Chapter 3.0: Project Description.** Chapter 3.0 includes a discussion of the proposed project's opportunity sites location and existing environmental setting, overall project relationship to the City's General Plan, background and related planning documents, description of the proposed project and opportunity sites, projects objectives, and discretionary actions, permits, and other approvals.
- **Chapter 4.0: Environmental Impact Analysis.** Chapter 4.0 includes an analysis of the proposed project's environmental impacts. It is organized into the following topical sections: air quality, cultural resources, energy, greenhouse gas emissions, , land use and planning, noise, population and housing, public services, transportation, tribal cultural resources and utilities and service system. The environmental setting discussions describe the "existing conditions" of the environment on the proposed projects opportunity sites as they pertain to the environmental issues being analyzed (CEQA Guidelines §15125).

The impact discussions identify and focus on the potentially significant environmental effects of the proposed project. The direct and indirect effects of the proposed project on the environment are identified and described, giving due consideration to both the short-term and long-term effects, as necessary (CEQA Guidelines §15126.2[a]).

Chapter 4.0 also includes within the analysis of each environmental topic a discussion of the cumulative effects of the proposed project when considered in combination with other projects causing related impacts, as required by *State CEQA Guidelines* Section 15130. For the purposes of the EIR, a summary of build-out projections contained in the adopted General Plan and related planning documents was developed to determine potential cumulative impacts. LSA developed the General Plan build-out assumptions by reviewing the land use assumptions in the City's Transportation Analysis Zones (TAZs) in the Orange County Transportation Analysis Model (OCTAM) and adjusting them to reflect anticipated growth allowed under the General Plan and or approved projects in a related planning document.

The discussions of mitigation measures identify and describe feasible measures that could minimize or lessen potentially significant impacts for each significant environmental effect identified in this EIR (CEQA Guidelines §15126[e]). The levels of significance before and after



mitigation are provided. Significant unavoidable adverse effects are identified where mitigation is not expected to reduce the effects to less than significant levels.

- **Chapter 5.0: Alternatives to the Proposed Project.** In accordance with CEQA, the alternatives discussion in Chapter 5.0 describes a reasonable range of alternatives that could feasibly attain the basic objectives of the proposed project and are capable of eliminating or substantially reducing any of the proposed project’s significant unavoidable adverse environmental effects or reducing them to a less than significant level. The alternatives analyzed in Chapter 5.0 include three alternatives: (1) the No Project Alternative, (2) the Reduced Intensity Alternative, and (3) Alternative 2 Lincoln Avenue Specific Plan Mixed Density.
- **Chapter 6.0: Other CEQA Considerations.** Chapter 6.0 contains discussions on the following topics as required by *State CEQA Guidelines* Section 15126: (1) growth-inducing impacts of the proposed project; and (2) whether there are any significant irreversible environmental changes caused by the proposed project, adverse environmental impacts associated with the proposed project for which either no mitigation or only partial mitigation is feasible.
- **Chapter 7.0: Mitigation Monitoring and Reporting Program.** *State CEQA Guidelines* Section 15091(d) requires that public agencies adopt a mitigation monitoring and reporting program for any changes that it has either required in a project or made a condition of approval to avoid or substantially lessen significant environmental effects. Chapter 7.0 provides a list of all proposed project mitigation measures, defines the parties responsible for implementation and review, and identifies the timing for implementation of each mitigation measure.
- **Chapter 8.0: List of Preparers.** Chapter 8.0 provides the organizations and persons contacted during preparation of this EIR, the EIR preparers and technical report authors, and other experts involved in the preparation of this EIR.
- **Chapter 9.0: References.** Chapter 9.0 provides the references used in this EIR.

2.5 INCORPORATION BY REFERENCE

An EIR may incorporate by reference all or portions of another document that is a matter of public record or is generally available to the public, consistent with *State CEQA Guidelines* Section 15150. Informational details from the documents that have been incorporated by reference are summarized in the appropriate sections of this EIR, along with descriptions regarding how the public may review these documents. All documents are available for review at the City of Cypress, Community Development Department. These documents include:

- City of Cypress General Plan (available online at: <https://www.cypressca.org/departments/community-development/planning-division>)
- City of Cypress Municipal Code (available online at: <https://qcode.us/codes/cypress/>)
- Cypress Business and Professional Center Specific Plan
- Lincoln Avenue Specific Plan
- Cypress Town Center and Commons Specific Plan



3.0 PROJECT DESCRIPTION

3.1 PROJECT LOCATION AND EXISTING ENVIRONMENTAL SETTING

As illustrated by Figure 3-1, Regional Location, the City of Cypress (City) (also referred to as the “planning area”) includes approximately 6.6 square miles, in the northwestern portion of the County of Orange, California. The City is bordered on the north by the cities of La Palma and Buena Park, on the east by the cities of Anaheim and Stanton, on the south and west by the city of Los Alamitos, and on the west by the cities of Long Beach, Hawaiian Gardens, and Lakewood. Regional vehicular access to the City is provided via State Route 22 (SR-22), Beach Boulevard (State Route 39 [SR-39]), State Route 91 (SR-91), and Interstates 405 and 605 (I-405 and I-605, respectively).

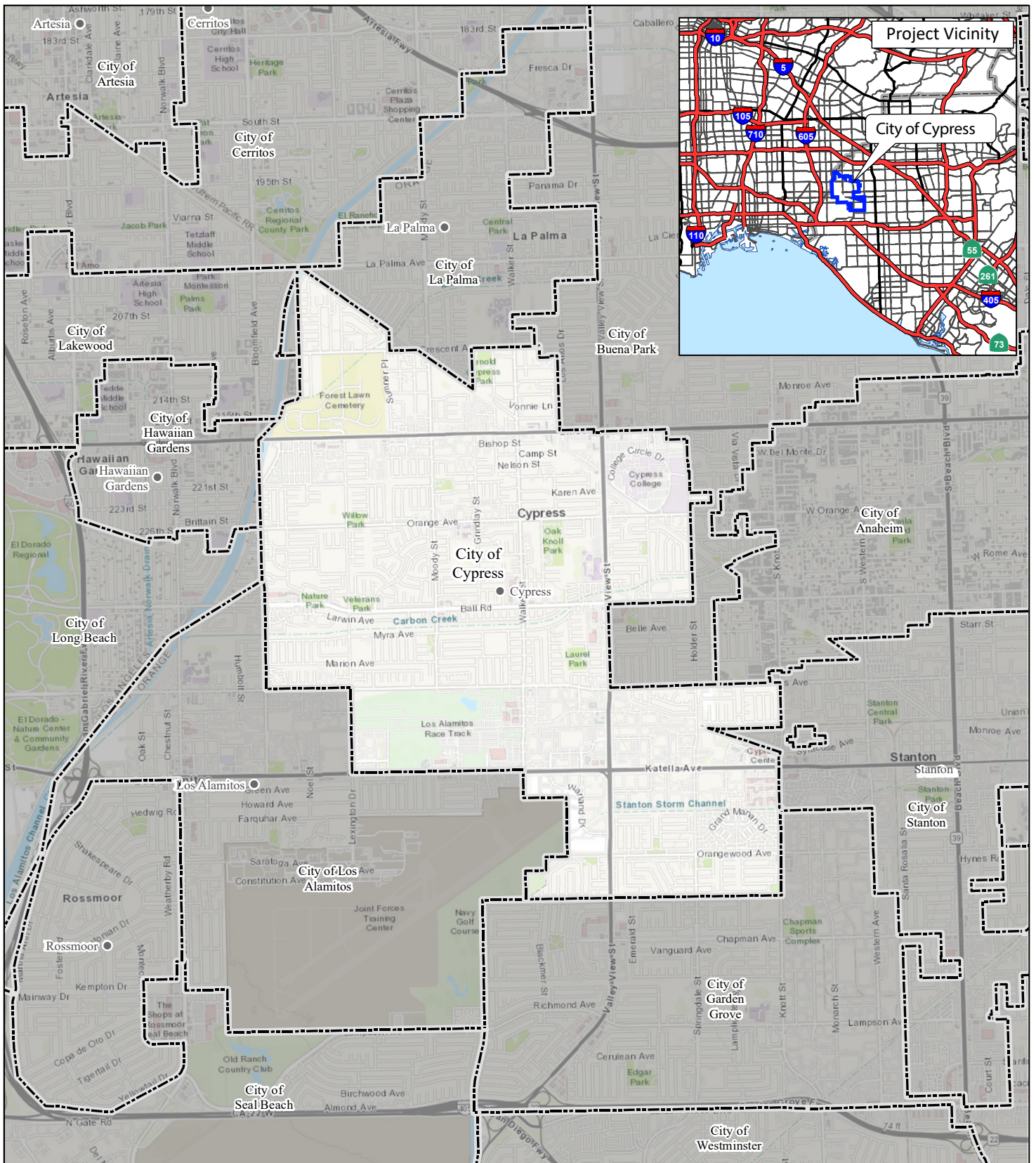
Cypress began as a small dairy community established along Pacific Electric's rail line between Los Angeles and Santa Ana in the early 1900s. The new town began to develop around the rail station at what is now the intersection of Lincoln Avenue and Walker Street. Soon after the City's incorporation in 1956, Cypress began a period of rapid development that primarily included the addition of single-family housing tracts. Lincoln Avenue emerged as the City's primary commercial corridor. The Los Alamitos Race Course was built on a 435-acre ranch in the southern portion of the City. Cypress College opened in 1966 on approximately 110 acres southeast of Valley View Street and Lincoln Avenue. The master-planned Cypress Business Park was developed in the mid-1970s and 1980s, providing employment opportunities for the City's residents as well as residents of neighboring communities in the region. An extensive parks and recreation system has been developed to serve City residents and workers. Since the closure of the Cypress Golf Course in the southern portion of the City in 2004, several areas adjacent to the Los Alamitos Race Course have undergone redevelopment, transforming into a Costco, the Cottonwood Church campus, senior housing, and a new sports park. A mixed-use development with 251 residential units, a hotel, and commercial space, which includes The Square retail center, was approved in May 2020 for a 13-acre property at the northeast corner of Siboney and Katella Avenue. Belmont, a 135-unit residential development was approved in May 2021 for a 7-acre property southwest of Vessels Circle, and Citrus Square, a 98-unit senior housing development was approved in October 2021 for the Cypress School District's former administrative and maintenance facility at the northeast corner of Moody Street and Orange Avenue. All three of these projects are currently under construction. As shown in Figure 3-2, Aerial Imagery, the City is now almost completely built out and contains very limited undeveloped land.

The City is situated within an area typified by a Mediterranean climate, which is characterized by mild winters and dry, warm summers. The interactions of topography and local atmospheric circulation cause this region of California to experience high quantities of photochemical smog.

The City receives its water from two major sources: the Metropolitan Water District (MWD) and the groundwater basin underlying the northern half of Orange County. Imported water comes mainly from the Colorado River, with a smaller amount being acquired from the State Water Project in northern California. Coyote Creek, Carbon Creek, Moody Creek, and the Stanton Storm Channel comprise the regional drainage systems for the area.



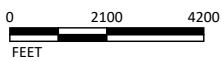
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LSA

LEGEND

--- City Boundary



SOURCE: ArcGIS Online Topographic Map (2020)
 I:\CCP2201.01\G\Regional_Location.ai (7/24/2023)

FIGURE 3-1



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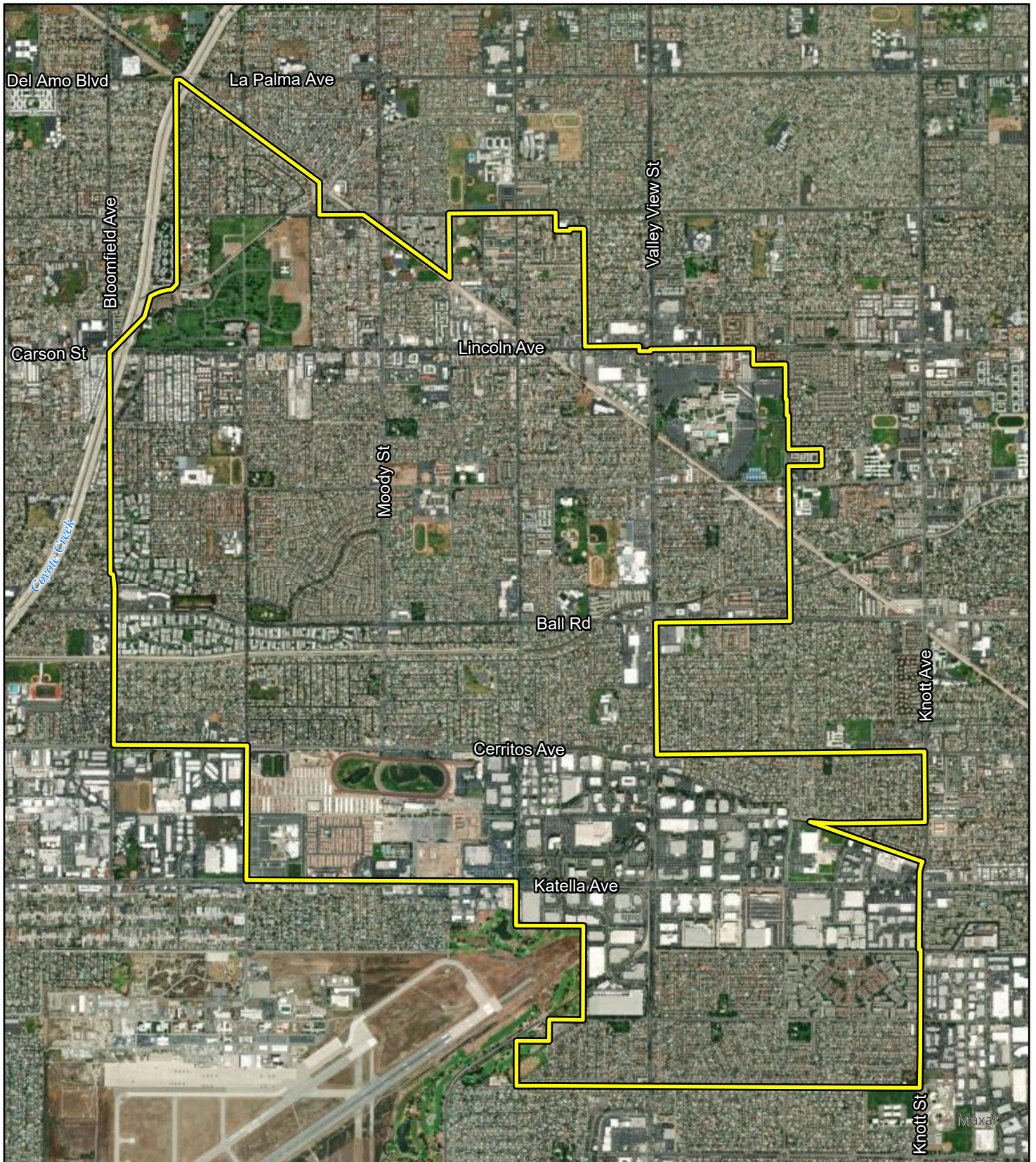


FIGURE 3-2

LSA

 City Boundary



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Miles

SOURCE: Maxar Imagery (8/2021)

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2021–2029 Cypress Housing Element Implementation Project
Aerial Imagery



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Urbanization within the City has eliminated any sizeable expanses of undisturbed native vegetation. The City's terrain is nearly flat, with a gradual downward slope from the northeast to the southwest.

3.2 CYPRESS GENERAL PLAN

The Cypress General Plan represents a comprehensive approach for managing the community's future. The Cypress General Plan also reflects the City's long-term strategy for directing physical, economic, and cultural development. The General Plan is a legally binding policy document intended to serve as a guide by City officials, developers, and the community when making decisions regarding future development and the management of land and natural resources.

In relation to development, the Cypress General Plan serves as a blueprint guiding the type of community the City desires for its future, and also provides the means by which that desired future can be obtained. The General Plan establishes goals, policies, and directions and uses text, maps, and graphic illustrations to express the organization of the physical, environmental, economic, and social environment sought by the community in order to achieve a healthful, functional, and desirable place in which to reside and work.

3.2.1 State General Plan Requirements

Government Code Section 65302 et seq. requires that every city and county in the State of California (State) prepare and adopt a "comprehensive, long-term general plan for the physical development of the county or city, and of any land outside its boundaries which in the planning agency's judgment bears relation to its planning." As further mandated by the State, the General Plan must serve to:

- Identify land use, circulation, environmental, economic, and social goals and policies for the City and its surrounding planning area as they relate to land use and development;
- Provide a framework within which the City Council can make land use decisions;
- Provide citizens the opportunity to participate in the planning and decision-making process affecting the City; and
- Inform citizens, developers, decision-makers, and other agencies, as appropriate, of the City's basic rules that will guide both environmental protection and land development decisions within the City.

State law requires that the General Plan include the following seven mandatory elements: Land Use, Circulation, Housing, Conservation, Open Space, Noise, and Safety. While these seven elements are required, State law also allows flexibility in how each local jurisdiction structures these elements. In addition to these seven elements, the existing Cypress General Plan includes a Growth Management Element and an Air Quality Element which address issues beyond those required by State law. While State law does not mandate discussion of these issues, once adopted, "optional" issues have the same force and effect as policies related to the General Plan elements required by the State.



3.2.2 General Plan Consistency

In addition to providing a comprehensive strategy for directing future growth, State law mandates that the General Plan be internally consistent. Specifically, Government Code Section 65300.5 requires the various components of a General Plan to, “comprise an integrated, internally consistent and compatible statement of policies.” The three primary components required to maintain internal General Plan consistency are as follows:

1. **Equal Status among General Plan Elements.** All elements of a General Plan have equal status and no one General Plan element takes precedence over any other. As such, the General Plan elements must be consistent in order to avoid potential conflicts between or among the elements.
2. **Consistency between Elements and within Individual Elements.** All General Plan elements must be consistent with each other. For example, policies and implementation strategies outlined in one General Plan element must not require or encourage an action that would be prohibited or discouraged by policies and implementation strategies in another General Plan element. This includes consistency between Specific Plans and the jurisdiction’s General Plan.
3. **General Plan Text, Diagram, and Map Consistency.** Text, diagrams, and maps must be consistent with one another and with goals and policies outlined in all elements of the General Plan.

It is also important to note that the General Plan aims to balance competing objectives and community priorities. As such, in interpreting goals, policies, and implementation strategies in the General Plan, care must be given to determine the “best fit” for the action to be taken, aimed towards achieving the City’s short-term and long-term priorities.

3.2.3 Comprehensive Nature of the General Plan

The Cypress General Plan establishes goals, policies, and implementation strategies aimed at guiding the physical, social, environmental, and economic environments. In addition to addressing the State-mandated components of a General Plan, the Cypress General Plan also responds to current and future issues the City faces. In order to fully address these issues, the Cypress General Plan planning area encompasses the current City limits, while also keeping in mind the regional context of its planning efforts. For example, certain issues such as traffic, transit, air quality, and greenhouse gas (GHG) emissions have both a local and regional component. In such cases, the General Plan addresses the degree to which the City’s interests, values, and concerns are congruent or conflict with existing regional policies. Furthermore, it is also the role of the Cypress General Plan to define the extent to which the City can address local issues and those issues that require cooperative actions among several jurisdictions.

3.3 BACKGROUND AND PLANNING DOCUMENTS

The City recently updated its Housing Element for the 6th Cycle Planning Period from 2021 to 2029. To comply with State Housing law, the City’s Housing Element was updated to ensure the City’s policies and programs can accommodate the estimated housing growth needs identified in the



Southern California Association of Governments' (SCAG) Regional Housing Needs Assessment (RHNA) allocation for the Planning Period. Per the RHNA, the City is allocated 3,936 dwelling units to accommodate the estimated growth needed at various income levels. The 2021–2029 Housing Element included a candidate site analysis to accommodate the 3,936-unit RHNA and any estimated “carryover” from the 5th Cycle Housing Element, and an additional analysis of candidate sites to address future “no net loss” provisions of Senate Bill (SB) 166. As required by State Housing law, including Assembly Bill (AB) 1397, the 2021–2029 Housing Element identified land in the City’s ability to accommodate this estimated growth through available sites and appropriate zoning.

Pursuant to State law, the City adopted an update to its Housing Element covering the 6th Cycle Planning Period from October 2021–October 2029. The 2021–2029 Housing Element addresses the needs of all income levels. It contains an analysis and update of housing and population data based on the most current conditions and sources of information. The revisions incorporate current population and housing projections based upon SCAG’s RHNA adopted in March 2021 for the 6th Cycle Planning Period.

The Housing Element calls for the continuation of existing policies and programs to enable the City to meet future housing demands for all economic segments of the community that address housing quality and quantity, housing affordability and access, equal housing opportunities and natural resources, and energy efficiency and conservation, and identifies new programs in conformance with recent housing legislation for implementation during the 2021–2029 Housing Element cycle.

The goals of the Housing Element are to promote housing that helps to create safe, livable, and sustainable neighborhoods, facilitate the construction and provision of quality housing to meet the City’s diverse needs, create opportunities for affordable housing, particularly in vulnerable areas and in areas of opportunity, and promote equitable and accessible housing options and resources.

The 2021–2029 Housing Element does not propose or approve any specific development projects. The 2021–2029 Housing Element acknowledges and addresses recent State legislation regarding requirements for local density bonus programs, surplus lands, accessory dwelling unit (ADU) streamlining, and removing local barriers to housing. It is not possible to predict which properties in the City, if any, may propose and qualify for density bonus programs. The 2021–2029 Housing Element includes a policy that requires that a rezoning program be undertaken during the early portion of the 6th Cycle Planning Period to ensure internal consistency between the various elements of the City’s General Plan and its Zoning Ordinance. In addition, the 2021–2029 Housing Element contains several programs that require amendments to the City’s General Plan and Zoning Ordinance to ensure the provision of adequate and appropriate sites for future housing development to accommodate the City’s unmet housing needs. Future discretionary governmental approval of site-specific housing projects, including those proposing a density bonus component, will require review in accordance with the California Environmental Quality Act (CEQA) and, if applicable, the National Environmental Policy Act (NEPA).

The proposed project would include an update to the City’s General Plan, Specific Plans and Zoning Code and is necessary to provide consistency with the 2021–2029 Housing Element.



3.3.1 Land Use Element

The Land Use Element and the Land Use Policy Map establish the overall policy direction for land use planning decisions in the City. The General Plan Land Use Policy Map displays graphically the location and distribution of land use in Cypress, whereas the text of the Land Use Element describes the form these uses will take, as well as the programs the City will pursue to implement the land use goals.

Goals and policies set forth in the Land Use Element shape and reflect the policies and programs contained in the other General Plan elements. For example, the street system and circulation improvements described in the Circulation Element are designed to accommodate the intensity of uses allowed by land use policy. Housing Element programs focus on alleviating unmet housing needs, neighborhood stabilization, and the rehabilitation of housing units.

The Land Use Element is divided into seven sections: Introduction, Relationship to Other Plans and General Plan Elements, Relationship of Existing Plans and Programs to Citywide Economic Development Efforts, Summary of Existing Conditions, Key Land Uses, Description of the Land Use Plan, and Goals and Policies.

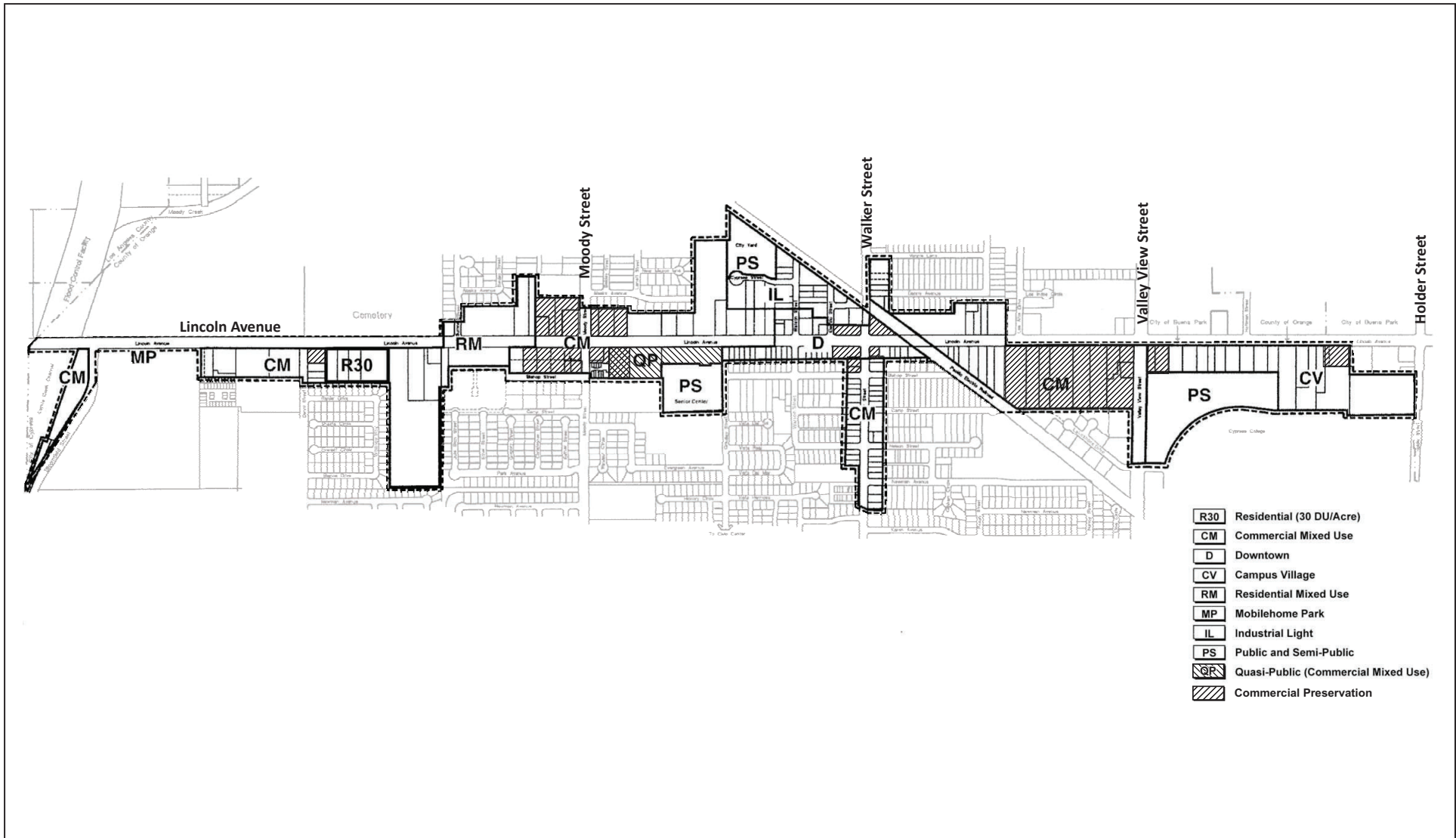
3.3.2 Lincoln Avenue Specific Plan

Specific Plans are designed to implement General Plan goals and policies by designating land uses, densities, development, and design standards in more specific detail. This is accomplished by designating specific locations and intensities for land uses and specific development standards and design guidelines. A specific plan is able to address smaller areas that have unique qualities and require focused planning attention. A specific plan may be designed to implement any of a general plan's elements.

The Lincoln Avenue Specific Plan (LASP) was approved by the Cypress City Council in 1998. Prior to its approval, an Initial Study/Negative Declaration (IS/ND) was prepared and adopted by the City Council in October 1998. The Lincoln Avenue Specific Plan has subsequently been amended numerous times, including in 2006 to eliminate the maximum front building setback within the Campus Village land use district, in 2009 to create a new Residential R30 District and to provide for transitional housing, supportive housing, and emergency shelters in conjunction with the 2009 Housing Element Update, and in 2016 to create a Commercial Preservation Overlay. An IS/ND was prepared for the 2006 amendment, while an Initial Study/Mitigated Negative Declaration (IS/MND) was prepared for the 2009 update. An addendum to the 2009 IS/MND was prepared for the 2016 update.

The Lincoln Avenue Specific Plan area is situated in the northern portion of the City and extends east to west approximately 3.1 miles. Lincoln Avenue is the major east-west commercial corridor for the City. There are a wide variety of land uses within this specific plan, including, low intensity commercial, retail-commercial, service oriented, and residential uses.

The Lincoln Avenue Specific Plan serves as a comprehensive policy and regulatory document to guide the continued development and redevelopment of the Lincoln Avenue Specific Plan area. As shown in Figure 3-3, Lincoln Avenue Specific Plan Planned Land Uses, the Lincoln Avenue Specific Plan is divided into nine different land use districts, which allow a mix of residential, commercial, mobile home park, public and semi-public, quasi-public, and light industrial uses.



LSA

FIGURE 3-3



NO SCALE

SOURCE: Herdman Architecture + Design, Scott Peterson Landscape Design, Inc.
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2021–2029 Cypress Housing Element Implementation Project
 Lincoln Avenue Specific Plan Planned Land Uses



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3.3.3 Cypress Town Center and Commons Specific Plan 2.0

In June 2018, the City's voters approved Measure A, which approved the Cypress Town Center and Commons Specific Plan 2.0 (CTCC Specific Plan). Pursuant to *State CEQA Guidelines* Section 15378, the submittal of a proposal to a vote of the people of a particular community that does not involve a public agency sponsored initiative is not a project under CEQA. Therefore, the preparation of a CEQA compliance document (such as an IS/MND or an EIR) was not required for the CTCC Specific Plan.

The CTCC Specific Plan establishes a comprehensive master plan and regulatory framework for the use and development of approximately 154.4 acres of land in the City. The CTCC Specific Plan area includes the Los Alamitos Race Course property and is generally bounded by Cerritos Avenue to the north, Katella Avenue to the south, and Lexington Drive to the west.

As shown in Figure 3-4, Cypress Town Center and Commons Specific Plan 2.0 Planned Land Uses, the CTCC Specific Plan area is divided into six land use districts. One of the primary features of the CTCC Specific Plan is the town center district, which is intended to be the City's "main street" and a gathering place for the community, and will include a vibrant mix of entertainment, retail, restaurant, commercial and residential uses. The creation of the town center will enable future residents to live within walking distance of stores, restaurants, and recreational areas, while visitors will be able to walk and shop along the concourses and enjoy an assortment of public plazas. Additionally, the CTCC Specific Plan area includes 20 acres of public park space that will be located on multiple sites within the CTCC Specific Plan area.

The CTCC Specific Plan's residential district is intended to accommodate a variety of residential opportunities and lifestyles. Residential units adjacent to Cerritos Avenue will generally match the densities of the existing neighborhood north of Cerritos Avenue. Further south, smaller-lot, single-family homes are permitted, as well as single-family attached units, including townhomes and condominiums. Trails and greenways are envisioned to connect the neighborhoods and provide pedestrian and bike routes to the public parks and town center. The senior housing/medium-density residential district allows age-restricted housing (with a qualified occupant of 55 or older), as well as multi-family housing, at a variety of densities.

3.3.4 Cypress Business and Professional Center Specific Plan

The Cypress Business and Professional Center Specific Plan (1990 CBPC Specific Plan), for which an EIR was prepared and certified, was approved by the Cypress City Council on April 17, 1990. The 1990 CBPC Specific Plan provided guidance and regulations for the development of the 298.2 gross acres within its planning area, which generally consisted of the area bound by Katella Avenue to the south, Cerritos Avenue to the north, Walker Street to the east, and Denni Street/Lexington Avenue to the west. The 1990 CBPC Specific Plan included 11.8 acres of Mixed-Use Business Park, 33.4 acres of Professional Office, 21.2 acres of Professional Office and Hotel and Support Commercial uses, 8.2 acres of Mixed Use Business Park/General Retail Commercial, 93.6 acres of renovated golf course, and 130 acres of race track uses within its planning area by establishing policies and zoning designations.



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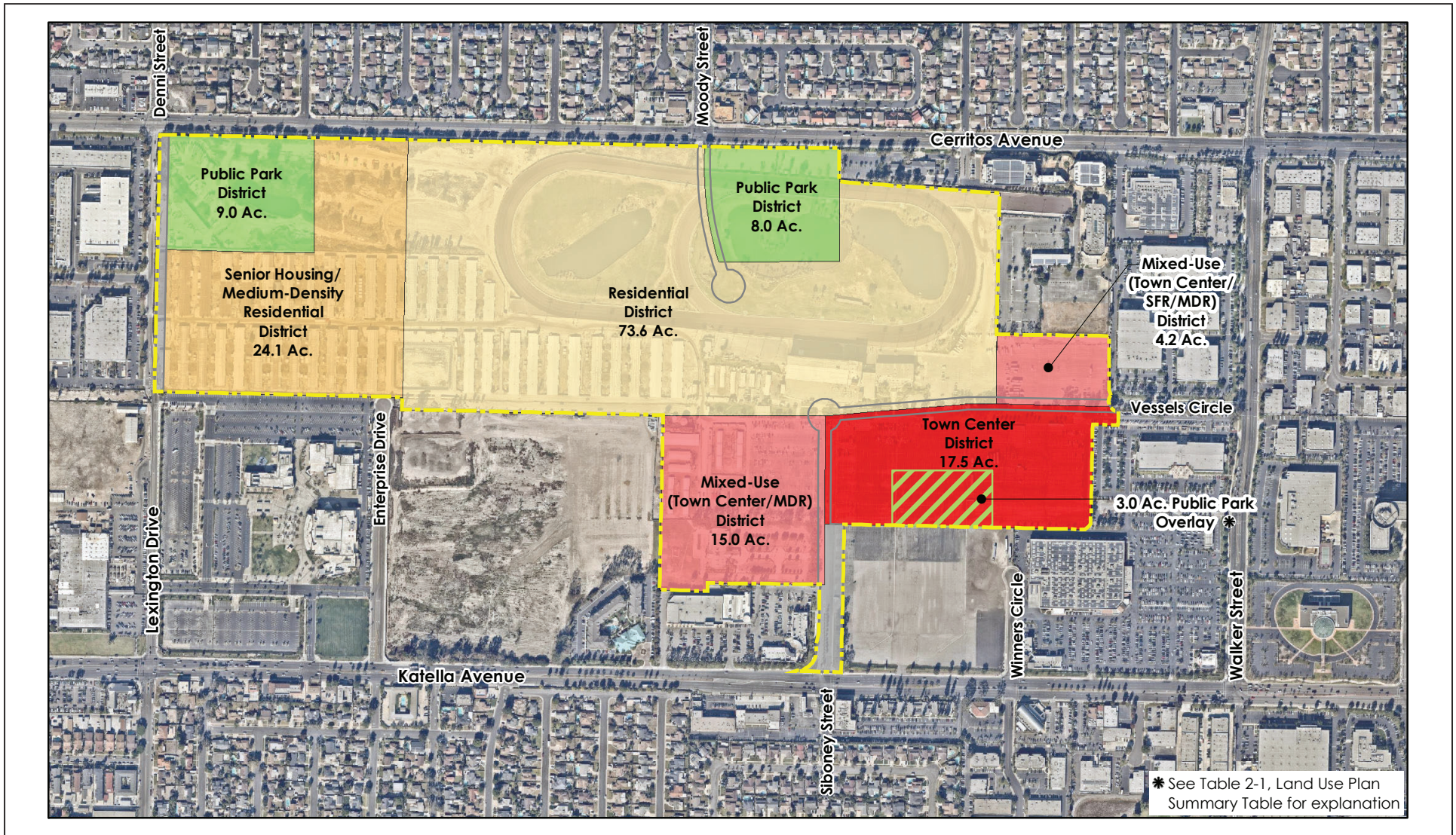
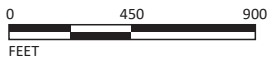


FIGURE 3-4

LSA

LEGEND

- Recreation/Open Space
- Commercial/Mixed Use
- Residential Uses



SOURCE: Forma, 12/2017

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2021–2029 Cypress Housing Element Implementation Project

Cypress Town Center and Commons
Specific Plan 2.0 Planned Land Uses



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In June 2012, the City approved the Amended and Restated Cypress Business and Professional Center Specific Plan (CBPC Specific Plan), which expanded the permitted range of uses within the CBPC Specific Plan area. Figure 3-5, Cypress Business and Professional Center Specific Plan Planned Land Uses, shows the planned land uses within the 2012 CBPC Specific Plan area. As shown in Figure 3-5, a large portion of the CBPC Specific Plan area is now subject to the CTCC Specific Plan.

3.3.5 City of Cypress Zoning Ordinance

The Zoning Ordinance implements the policies of the Cypress General Plan by classifying and regulating the uses of land and structures within the City. The City’s Zoning Ordinance has been adopted to promote and protect the public health, safety, and general welfare of residents while preserving and enhancing the City’s aesthetic quality. The City is divided into zoning districts that directly correspond to the land use designations outlined in the Land Use Element of its General Plan. The City’s Zoning Ordinance classifies, regulates, restricts, and separates the use of land and structures, regulates and limits the bulk, height, and type of structures in the various zoning districts, and regulates areas of yards and other open areas abutting and between structures, and regulates the density of population.

3.4 PROPOSED PROJECT

The proposed project is a programmatic update to the City’s General Plan, Lincoln Avenue Specific Plan (LASP), Cypress Town Center and Commons Specific Plan 2.0 (CTCC Specific Plan), Cypress Business and Professional Center Specific Plan (CBPC Specific Plan), and Zoning Ordinance and would not directly result in physical development. The proposed project includes amendments to the City’s Zoning Ordinance and an update of the City’s General Plan to reflect the 2021–2029 Housing Element adopted on June 27, 2022. The proposed project would update the City’s General Plan and Zoning Ordinance, and the Lincoln Avenue Specific Plan to be “internally consistent,” meaning any and all conflicts must be acknowledged and resolved. In order for the 2021–2029 Housing Element to be internally consistent with the Zoning Ordinance and Specific Plans, the proposed project would rezone sites and/or amend the General Plan to accommodate the City’s housing needs, as set forth in the 2021–2029 Housing Element.

The 2021–2029 Housing Element identifies several adequate sites that are able to accommodate the development of up to 1,946 new housing units (504 of which have already been entitled), but the City has a large unaccommodated housing need of 1,990 units in order to meet its RHNA allocation of 3,936 units. The City has identified several opportunity sites that are candidates for future housing development. The City identified two different potential rezoning scenarios in the 2021–2029 Housing Element, one of which was selected as the preferred scenario and has been identified as the proposed project in this Draft EIR.¹

¹ The second rezoning scenario included in the 2021–2029 Housing Element will be evaluated as a project alternative in the EIR being prepared for the implementation of the 2021–2029 Housing Element.



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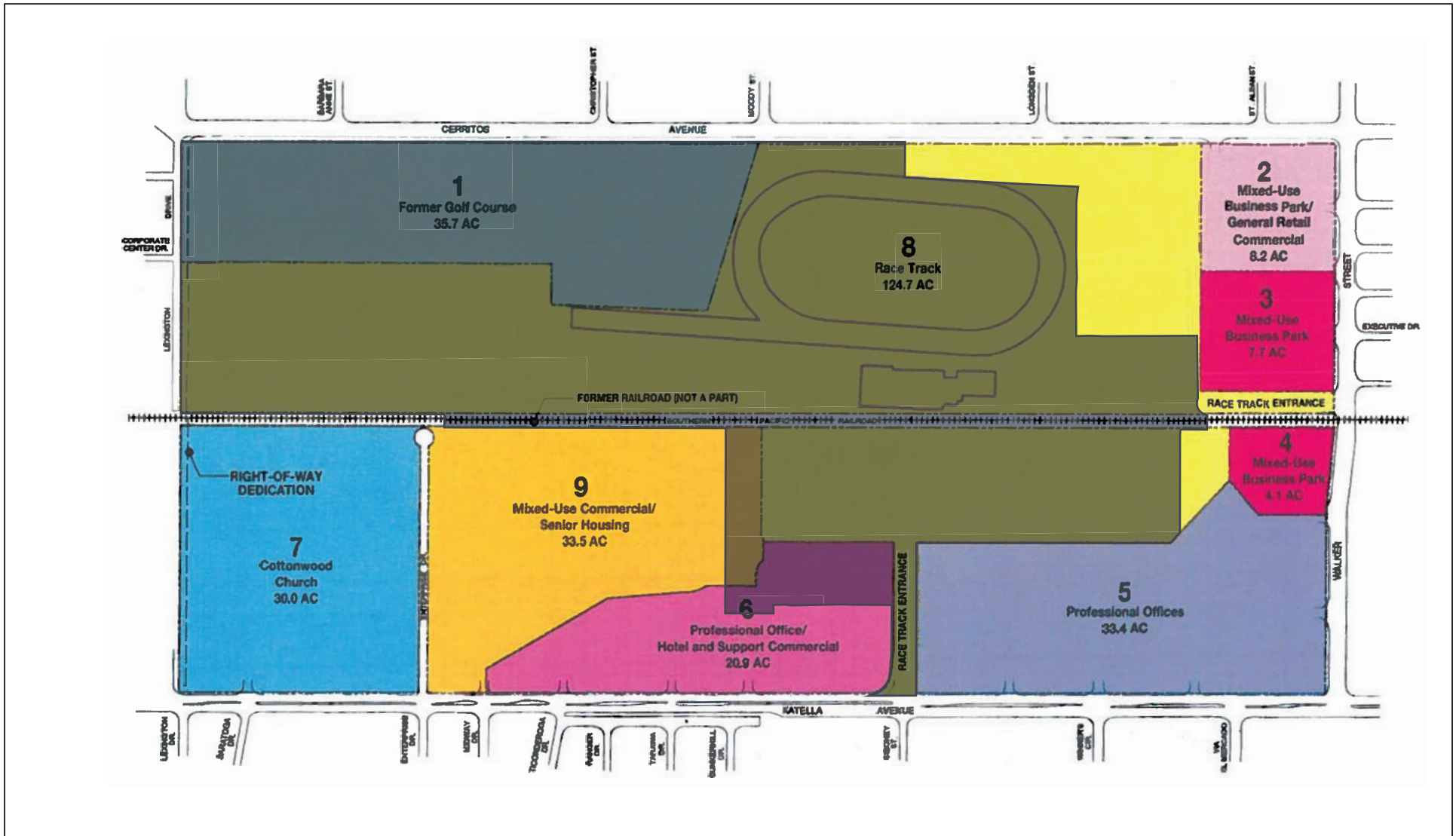
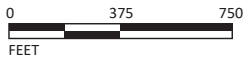


FIGURE 3-5

LSA

LEGEND

Cypress Town Center and Commons Specific Plan 2.0





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Table 3.A, Proposed Project Opportunity Sites Summary, provides a summary of the proposed project and Figure 3-6, Opportunity Sites, shows the locations of the opportunity sites and their proposed densities under the proposed project.

Table 3.A: Proposed Project Summary

Specific Plan	Proposed Increase In Housing Unit Capacity
Lincoln Avenue Specific Plan	1,317
Cypress Town Center and Commons Specific Plan 2.0	676
Cypress Business and Professional Center Specific Plan	321
Total	2,314

Source: City of Cypress Planning Department (2023).

As shown in Table 3.A, the proposed project divides the City’s RHNA between the CTCC Specific Plan, CBPC Specific Plan area and LASP area. Located on the Los Alamitos Race Course site, the CTCC Specific Plan currently allows the development of residential units throughout seven districts which range in density from 8 dwelling units per acre (du/ac) to approximately 20 du/ac. As currently approved, the CTCC Specific Plan utilizes maximum density requirements in various districts as well as a maximum unit cap of 1,250 units in the CTCC Specific Plan area.² Under the proposed project, the allowable residential density within approximately 42 acres of the CTCC Specific Plan area would increase to up to 30 dwelling units per acre to accommodate a maximum of an additional 676 units and the existing unit cap of 1,250 units would be revised to allow development up to 1,791 total residential units. The zoning in the remainder of the CTCC Specific Plan would remain unchanged. With these proposed changes, an estimated 1,791 units could be accommodated within the CTCC Specific Plan area, in addition to the 135-unit Belmont project currently under construction.

The proposed project also includes one opportunity site on Katella Avenue adjacent to the CTCC Specific Plan area (Site #115, 4955 Katella) in the CBPC Specific Plan area. The CBPC Specific Plan area limits residential land uses to Senior Housing. The zoning on this parcel would be amended from a Professional Office/Hotel and Support Commercial zoning designation to allow residential densities of up to 60 du/ac, which would accommodate an estimated 321 units. The primary existing building on the site is a big box type structure which accommodates two tenants. One half of the building is occupied by a gym and the other half of the building is currently vacant (formerly an Office Depot).

Under the proposed project, the remaining RHNA sites would be accommodated within the LASP. The LASP currently allows for residential development at 30 du/ac within the RM-30 and Residential Mixed Use districts. The proposed project would expand the maximum allowable density of 30 du/ac to the majority of the Lincoln Avenue Specific Plan area, increasing development potential by approximately 1,317 units. With these amendments, the Lincoln Avenue Specific Plan could accommodate a total of approximately 1,644 units.

² While the unit cap within the CTCC Specific Plan is 1,250 units, the City has approved the 135-unit Belmont project which has been included as an entitled project. Therefore, there are 1,115 remaining units that may be permitted within the CTCC Specific Plan as currently adopted.



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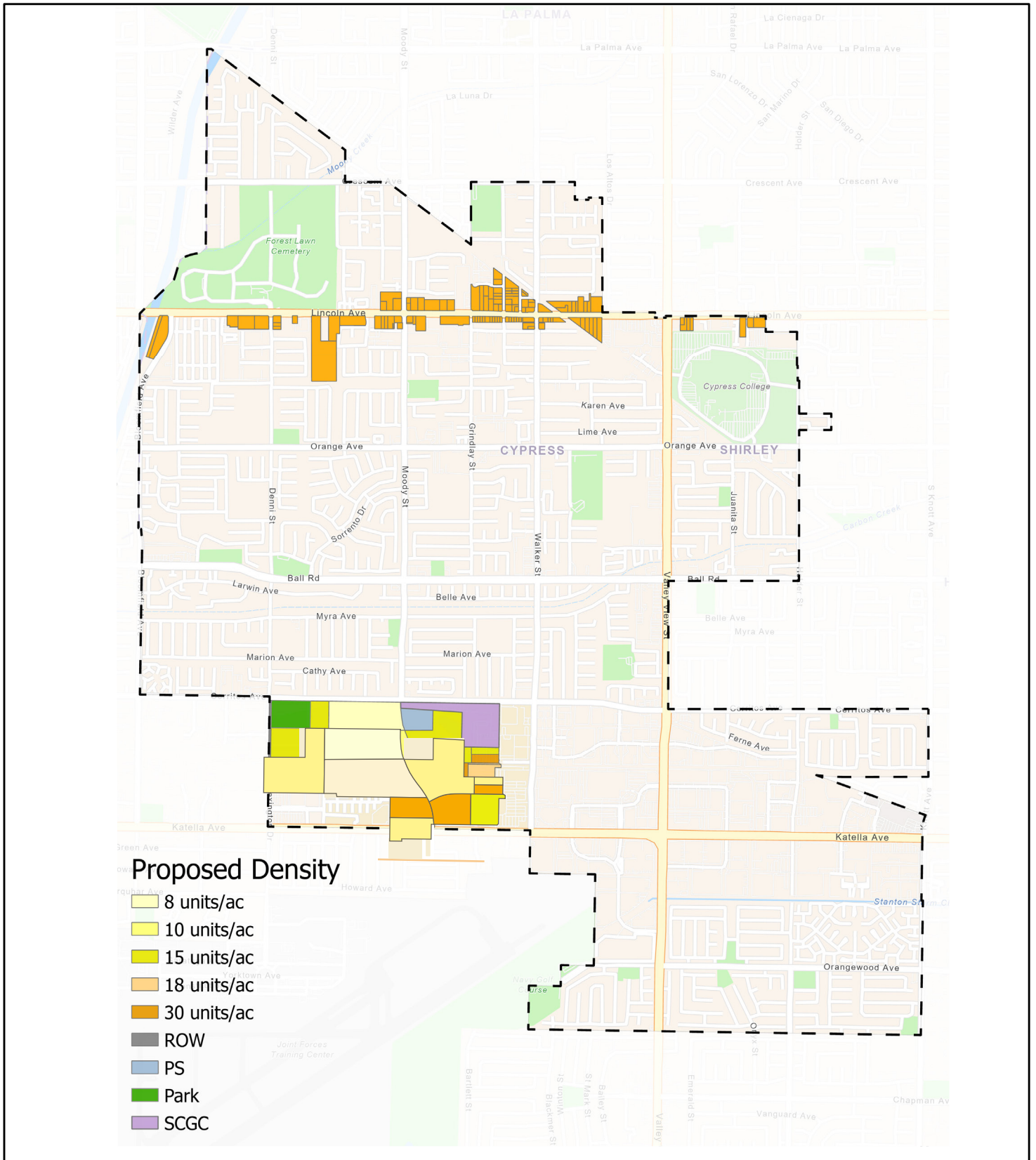


FIGURE 3-6





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Overall, the proposed rezoning actions under the proposed project would increase the City's development capacity to 4,260 units, or an increase of 2,314 units compared to the City's existing planning and zoning documents. Table 3.A provides a summary of the proposed project scenario.

The City would be required to hold an election to implement changes to the CTCC Specific Plan. An in-depth evaluation of Alternative 2 is included in Chapter 5.0, Alternatives, of this Draft EIR. Changes to the Lincoln Avenue Specific Plan and the CBPC Specific Plan would be implemented through the City's typical public hearing process.

The proposed project would update the current General Plan Land Use Element, LASP, CTCC Specific Plan, CBPC Specific Plan, and Zoning Ordinance to bring the General Plan and Zoning Ordinances into conformity with the City's recently adopted 2021–2029 Housing Element. Descriptions of the General Plan elements, Specific Plans, and Zoning Ordinance are provided below.

3.4.1 Project Summary

The proposed project includes the approval of updates to the General Plan Land Use Element, LASP, CTCC Specific Plan, 2012 CBPC Specific Plan, and Zoning Ordinance. Although the project proposes these updates, future project-specific design details facilitated by approval of these updates are unknown at this time. The proposed project involves the adoption of citywide programmatic policy documents; future project-specific actions could be subject to further environmental review and the regulations contained in the adopted General Plan. As such, the following individual development components would be finalized on a project-by-project basis following approval of the proposed project:

- Type of use and number of units/square footage
- Circulation plan and number of parking spaces
- Building design and finalized site plan
- Lighting and landscaping
- Project design features
- Conservation and sustainability features
- Phasing and construction information

Following approval of the proposed project, the future physical improvements associated with changes in the General Plan, LASP, CTCC Specific Plan, CBPC Specific Plan, and Zoning Ordinance would be subject to further review on a project-specific basis. In other words, each future discretionary project would be subject to a project-level CEQA review at the time it is proposed for consideration by the City. Therefore, the impact analysis contained in this document addresses the potential environmental implications associated with the amendment of the City's General Plan, the LASP, the CTCC Specific Plan, the CBPC Specific Plan, and the City's Zoning Ordinance at a programmatic level, not for a project-specific development or for any specific proposal.



3.5 PROJECT OBJECTIVES

The City has established the following intended objectives, which would aid decision-makers in their review of the project and its associated environmental impacts:

1. Provide consistency between the 2021–2029 Housing Element, the City’s General Plan, the Lincoln Avenue Specific Plan, the CTCC Specific Plan, the CBPC Specific Plan, and the City’s Zoning Ordinance.
2. Meet the City’s housing needs as identified in the Regional Housing Needs Assessment Requirement (3,936 new dwelling units).
3. Implement sustainable planning and development practices by creating compact new developments and walkable neighborhoods to minimize the City’s contribution to greenhouse gas emissions (GHGs) and energy usage.
4. Promote changes in land use and development that reflect changes in the regional economy. Promote land uses that transform now-vacant or under-utilized sites.
5. Provide high-quality housing in a variety of forms, sizes, and densities to serve the diverse population of the City.

In addition to these objectives, the City’s Land Use and Circulation Elements contain numerous goals, implementation strategies, and policies to guide the use of land and circulation of the City. These citywide policies aim to provide a holistic and comprehensive guide for the City, whereas future projects facilitated by project approval would provide a refined direction for distinct areas within the City.

3.6 DISCRETIONARY ACTIONS, PERMITS, AND OTHER APPROVALS

This Draft EIR analyzes and documents the environmental impacts of the proposed project and all discretionary actions associated with the project. Refer to Chapter 2.0, Introduction, for further discussion of this document. In accordance with Sections 15050 and 15367 of the *State CEQA Guidelines*, the City is the designated Lead Agency for the proposed project and has principal authority and jurisdiction for CEQA actions and project approval. Responsible Agencies are those agencies that have jurisdiction or authority over one or more aspects associated with the development of a proposed project and/or mitigation. Trustee Agencies are public agencies that have jurisdiction by law over natural resources affected by a proposed project.

The legislative and discretionary actions to be considered by the City as a part of the proposed project include:

- **General Plan Update/Amendment:** The proposed project includes updates to the existing General Plan Land Use Element.
- **Specific Plan Amendments:** The proposed project includes amendments to the Lincoln Avenue Specific Plan, the CTCC Specific Plan, and the 2012 CBPC Specific Plan.



- **Zoning Amendment:** The proposed project includes an amendment to the City’s Zoning Ordinance and Zoning Map to resolve potential zoning inconsistencies resulting from adoption of the 2021–2029 Housing Element.



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4.0 EXISTING SETTING, ENVIRONMENTAL ANALYSIS, IMPACTS, AND MITIGATION MEASURES

OVERVIEW OF ENVIRONMENTAL SETTING

Chapter Format

This chapter contains 11 sections, and each section addresses one environmental topic listed in Appendix G of the Guidelines for the California Environmental Quality Act (*State CEQA Guidelines*) (California Code of Regulations [CCR] Title 14, Chapter 3, Sections 15000–15397).

For each environmental impact issue analyzed, the Environmental Impact Report (EIR) includes a detailed explanation of the existing conditions, thresholds of significance that will be applied to determine whether the project’s impacts are significant or less than significant, analysis of the environmental impacts, and a determination of whether the project would have a significant impact if implemented. A “significant impact” or “significant effect” means “a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, flora fauna, ambient noise, and object of aesthetic significance. An economic or social change by itself shall not be considered to be a significant effect on the environment.” (14 CCR Section 15382). Each environmental topic section in Chapter 4.0 also includes a discussion of the cumulative effects of the project when considered in combination with other projects, causing related impacts, as required by *State CEQA Guidelines* Section 15130.

Each of the sections is organized into eleven subsections, as follows:

- **Introduction** briefly describes the topics and issues covered in the section.
- **Methodology** describes the approach and methods employed to complete the environmental analysis for the issue under investigation.
- **Existing Environmental Setting** describes the relevant physical conditions that exist at the time of the issuance of the Notice of Preparation (NOP) that may influence or affect the issue under investigation. This section focuses on physical site characteristics that are relevant to the environmental topic being analyzed.
- **Regulatory Setting** lists and discusses the laws, ordinances, regulations, plans, and policies that relate to the specific environmental topic and how they apply to the proposed project.
- **Thresholds of Significance** sets forth the thresholds that are the basis of the conclusions regarding significance, which are primarily the criteria in Appendix G to the *State CEQA Guidelines* and the City of Cypress (City) *Initial Study/Environmental Checklist*, General Plan, or Zoning Code.
- **Project Impacts** describes the potential environmental changes to the existing physical conditions that may occur if the proposed project is implemented. Evidence is presented to show the cause-and-effect relationship between the proposed project and potential changes in



the environment. In accordance with *State CEQA Guidelines* Section 15126.2(a), this EIR is required to “identify and focus on the significant environmental effects” of the proposed project. The magnitude, duration, extent, frequency, and range or other parameters of a potential impact are ascertained to the extent feasible to determine whether impacts may be significant. In accordance with CEQA, potential project impacts, if any, are classified as follows for each of the environmental topics discussed in this PEIR.

- **Significant and Unavoidable Impact:** If the proposed project is approved with significant and unavoidable impacts, the decision-making body is required to adopt a statement of overriding considerations pursuant to *State CEQA Guidelines* Section 15093 explaining why the project benefits outweigh the unavoidable adverse environmental effects caused by those significant and unavoidable environmental impacts.
- **Less Than Significant with Mitigation Incorporated:** This classification refers to potentially significant environmental impacts that can be feasibly mitigated to a level of insignificance. If the proposed project is approved, the decision-making body is required to make findings pursuant to *State CEQA Guidelines* Section 15091 that significant impacts have been mitigated to the extent feasible through implementation of mitigation measures.
- **Less Than Significant Impact:** Less than significant impacts are environmental impacts that have been identified but are not potentially significant. No mitigation is required for less than significant impacts.
- **No Impact:** A “no impact” determination is made when the proposed project is found to have no environmental impact.
- **Level of Significance Prior to Mitigation** summarizes the potentially significant impacts of the project, if any, prior to mitigation.
- **Regulatory Compliance Measures and Mitigation Measures** describe relevant and applicable laws or regulations that must be adhered to with respect to the construction and/or operation of the proposed project and would reduce or lessen potential impacts related to a particular issue area and identifies project-specific measures that avoid, minimize, rectify, reduce, eliminate, or compensate for a potentially significant impact.
- **Level of Significance after Mitigation** describes the significance of potential impacts after implementation of mitigation measures. Potential significant unavoidable impacts are clearly stated in this section.
- **Cumulative Impacts** refers to potential environmental changes to the existing physical conditions that may occur as a result of project implementation together with all other reasonably foreseeable, planned, and approved future projects in the vicinity of the project site that produce related impacts. *State CEQA Guidelines* Section 15355 defines cumulative impacts as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” Cumulative impacts may result from individually minor but collectively significant projects taking place over a period of time. Projects that have progressed to the stage where CEQA review has been initiated are normally treated as



foreseeable probable future projects. For each of the environmental topics considered in this PEIR, the geographic scope of the cumulative analysis is defined.

Thresholds of Significance

The threshold questions used in this PEIR are consistent with Appendix G of the *State CEQA Guidelines*.

Effects Evaluated in this PEIR

The discussion of potential effects is presented by environmental resource area in this PEIR. As part of the Initial Study (Appendix A) prepared for the proposed project, the following environmental issues were considered but no adverse impacts were identified. These topics will not be analyzed further in the EIR as no new information identifying any one of them as a potentially significant impact was presented during the scoping process. As a result, there is no further discussion about the following issues in this PEIR.

- Aesthetics
- Agriculture and Forestry Resources
- Biological Resources
- Geology/Soils
- Hazards & Hazardous Materials
- Hydrology/Water Quality
- Mineral Resources
- Recreation

Related Projects

In accordance with *State CEQA Guidelines* Section 15130, cumulative impacts are anticipated impacts of the proposed project along with reasonably foreseeable growth. Reasonably foreseeable growth may be based on either:

- A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or
- A summary of projections contained in the adopted General Plan or related planning document, or in a prior environmental document that has been adopted or certified, and that described or evaluated regional or areawide conditions contributing to the cumulative impact.

For the purposes of this PEIR, a summary of build-out projections contained in the adopted General Plan and related planning documents was developed to determine potential cumulative impacts. As stated above, an analysis of the cumulative impacts associated with the General Plan and related documents and the proposed project is provided in the cumulative impacts discussion under each individual impact category in Chapter 4.0.



It is noted that some of the General Plan projects may never be built, or may be approved and built at reduced densities. However, to provide a conservative forecast, the future baseline forecast assumes that all of the related projects will be fully built out by 2045.

The discussion of cumulative impacts “should be guided by the standards of practicality and reasonableness” (*Environmental Protection Info. Center v. Department of Forestry & Fire Protection* (2008) 44 Cal.4th 459, 524). A proposal that has not crystallized to the point that it would be reasonable and practical to evaluate its cumulative impacts need not be treated as a probable future project (*City of Maywood v. Los Angeles Unified School District* (2012) 208 Cal.App.4th 362, 397). Rather, a potential future project qualifies for inclusion in an analysis of cumulative impacts only to the extent the future project is “both probable and sufficiently certain to allow for meaningful cumulative impact analysis” (*Id.* at 398; see *City of Long Beach v. Los Angeles Unified School Dist.* (2009) 176 Cal.App.4th 889, 902 [when “review[ing] the agency’s decision to include information in the cumulative impacts analysis[,] ... [w]e determine whether inclusion was reasonable and practical”]).

LSA developed the General Plan build-out assumptions by reviewing the land use assumptions in the City’s Transportation Analysis Zones (TAZs) in the Orange County Transportation Analysis Model (OCTAM) and adjusting them to reflect anticipated growth allowed under the General Plan and/or approved projects in a related planning document. The TAZs contained household data for 2016, which was updated to reflect 2045 anticipated build-out conditions. The updates made to the TAZ household data are described in Table 4.A below. As shown in Table 4.A, the number of households in the City is anticipated to grow by approximately 2,687 between 2016 and 2045 under the baseline General Plan build-out scenario.

Table 4.A: General Plan Cumulative Growth Assumptions

TAZ	General Location of City	2016 Households	2045 Households	Anticipated 2016–2045 Household Growth
501	Lincoln Avenue Specific Plan	752	813	61
504	Lincoln Avenue Specific Plan	321	381	60
505	Lincoln Avenue Specific Plan	519	531	12
506	Lincoln Avenue Specific Plan	1,164	1,193	29
507	Lincoln Avenue Specific Plan	737	1,237	500
508	Lincoln Avenue Specific Plan	848	975	127
509	Lincoln Avenue Specific Plan	543	699	156
519	Race Track Super Block	0	1,742	1,742
TOTAL		4,884	7,571	2,687

Source: LSA (2023).



4.1 AIR QUALITY

This section describes the potential air quality impacts for the 2021–2029 Cypress Housing Element Implementation Project (project) using methodologies and assumptions recommended in the air quality impact assessment guidelines of the South Coast Air Quality Management District (SCAQMD) in its *California Environmental Quality Act (CEQA) Air Quality Handbook*¹, and associated updates. In keeping with these guidelines, this section describes existing air quality and evaluates short-term impacts during construction, long-term emissions associated with operation, and how potential impacts correlate to human health. Air quality modeling data are included in Appendix B.

4.1.1 Methodology

The proposed project does not include any specific development projects. Under current zoning, the City of Cypress (City) has the capacity to accommodate the development of up to 1,946 new housing units, which includes 504 housing units that are already entitled and/or under construction. Therefore, the proposed rezoning action that is part of the project would increase the City's development capacity to 4,260 units or an increase of 2,314 units compared to the City's existing planning and zoning documents. As such, future development of the additional 2,314 units associated with the proposed project would result in criteria pollutant emissions associated with construction and operational sources.

Construction activities would generate emissions from off-road construction equipment, and on roadways as a result of construction-related truck hauling, vendor deliveries, and worker commuting. Operational activities would also generate emissions associated with miscellaneous on-site sources, such as natural gas combustion for cooking, heating, and landscaping equipment, and from operational-related traffic. This analysis used the California Emissions Estimator Model (CalEEMod) version 2022.1.1.14 to quantify the criteria pollutant emissions for both construction and operation of the proposed project. The maximum daily emissions are calculated for the criteria pollutants. The CalEEMod output sheets are contained in Appendix B of this Draft Program Environmental Impact Report (PEIR).

CalEEMod provides a platform to calculate both construction emissions and operational emissions from a project. It calculates both the daily maximum and annual average for criteria pollutants as well as total or annual greenhouse gas (GHG) emissions. The model also provides default values for water and energy use. Specifically, the model performs the following calculations:

- Short-term construction emissions associated with demolition, site preparation, grading, building, architectural coating (painting), and paving from off-road construction equipment; on-road mobile equipment associated with workers, vendors, delivery, and hauling; fugitive dust associated with grading, demolition, truck loading, and roads; and emissions of volatile organic compounds (VOC) from architectural coating and paving.

¹ South Coast Air Quality Management District (SCAQMD). 1993. *CEQA Air Quality Handbook*. Website: [http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)), (accessed June 2023).



- Operational emissions, such as on-road mobile vehicle traffic generated by the land uses, fugitive dust associated with roads, volatile emissions of reactive organic gases (ROGs) from architectural coatings, off-road emissions from landscaping equipment, volatile emissions of ROGs from consumer products and cleaning supplies, natural gas usage in the buildings, electricity usage in the buildings, water usage by the land uses, and solid waste disposal by the land uses.

In addition, CalEEMod contains default values and existing regulation methodologies to use in each specific local air quality district region. Appropriate statewide default values can be used if regional default values are not defined. This analysis used project-specific inputs and relevant model default factors for the Orange County area, which is within the SCAQMD jurisdiction for the emissions inventory, consistent with SCAQMD requirements.

4.1.2 Existing Environmental Setting

The City of Cypress is part of the South Coast Air Basin (Basin) and is under the jurisdiction of SCAQMD. Background information about air pollutants and health effects, climate, meteorological conditions, and regional air quality conditions in the Basin and local air quality conditions in the vicinity of the City is provided below.

4.1.2.1 Air Pollutants and Health Effects

Both State and federal governments have established health-based ambient air quality standards for six criteria air pollutants: carbon monoxide (CO), ozone (O₃), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), lead (Pb), and suspended particulate matter. In addition, the State has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety. Two criteria pollutants, O₃ and NO₂, are considered regional pollutants because they (or their precursors) affect air quality on a regional scale. Pollutants such as CO, SO₂, and Pb are considered local pollutants that tend to accumulate in the air locally.

The primary pollutants of concern in the City are O₃, CO, and suspended particulate matter. Significance thresholds established by an air quality district are used to manage total regional and local emissions within an air basin based on the air basin's attainment status for criteria pollutants. These emission thresholds were established for individual development projects that would contribute to regional and local emissions and could adversely affect or delay the air basin's projected attainment target goals for nonattainment criteria pollutants.

Because of the conservative nature of the significance thresholds and the basin-wide context of individual development project emissions, there is no direct correlation between a single project and localized air quality-related health effects. One individual project that generates emissions exceeding a threshold does not necessarily result in adverse health effects for residents in the project vicinity. This condition is especially true when the criteria pollutants exceeding thresholds are those with regional effects, such as ozone precursors like nitrogen oxides (NO_x) and ROGs.

Further, by its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to by itself result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a



project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant. In developing thresholds of significance for air pollutants, the air quality districts have considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions.

Occupants of facilities such as schools, daycare centers, parks and playgrounds, hospitals, and nursing and convalescent homes are considered to be more sensitive than the general public to air pollutants because these population groups have increased susceptibility to respiratory disease. Persons engaged in strenuous work or exercise also have increased sensitivity to poor air quality. Residential areas are considered more sensitive to air quality conditions, compared to commercial and industrial areas, because people generally spend longer periods of time at their residences, with greater associated exposure to ambient air quality conditions. Recreational uses are also considered sensitive compared to commercial and industrial uses due to greater exposure to ambient air quality conditions associated with exercise. These populations are referred to as sensitive receptors.

Air pollutants and their health effects, and other air pollution-related considerations are summarized in Table 4.1.A and are described in more detail below.

Ozone. O₃ is a secondary air pollutant produced in the atmosphere through a complex series of photochemical reactions involving ROG and NO_x. The main sources of ROG and NO_x, often referred to as ozone precursors, are combustion processes (including combustion in motor vehicle engines) and the evaporation of solvents, paints, and fuels. Automobiles are typically the largest source of ozone precursors. Ozone is referred to as a regional air pollutant because its precursors are transported and diffused by wind concurrently with ozone production through the photochemical reaction process. Ozone causes eye irritation, airway constriction, and shortness of breath and can aggravate existing respiratory diseases such as asthma, bronchitis, and emphysema.

Particulate Matter. Particulate matter is a class of air pollutants that consists of heterogeneous solid and liquid airborne particles from humanmade and natural sources. Particulate matter is categorized in two size ranges: PM₁₀, for particles less than 10 microns in diameter, and PM_{2.5}, for particles less than 2.5 microns in diameter. Motor vehicles are the primary generators of particulates, through tailpipe emissions as well as brake pad and tire wear, and entrained road dust. Wood burning in fireplaces and stoves, industrial facilities, and ground-disturbing activities such as construction are other sources of such fine particulates. These fine particulates are small enough to be inhaled into the deepest parts of the human lung and can cause adverse health effects. According to the California Air Resources Board (CARB), studies in the United States and elsewhere have demonstrated a strong link between elevated particulate levels and premature deaths, hospital admissions, emergency room visits, and asthma attacks, and studies of children's health in California have demonstrated that particle pollution may significantly reduce lung function growth in children.²

² California Air Resources Board (CARB). 2020. *Inhalable Particulate Matter and Health (PM_{2.5} and PM₁₀)*. Website: ww2.arb.ca.gov/resources/inhalable-particulate-matter-and-health (accessed June 2023).



Table 4.1.A: Sources and Health Effects of Air Pollutants

Pollutants	Sources	Primary Effects
Ozone (O ₃)	<ul style="list-style-type: none"> Precursor sources:¹ motor vehicles, industrial emissions, and consumer products. 	<ul style="list-style-type: none"> Respiratory symptoms. Worsening of lung disease leading to premature death. Damage to lung tissue. Crop, forest, and ecosystem damage. Damage to a variety of materials, including rubber, plastics, fabrics, paints, and metals.
Particulate Matter Less than 2.5 Microns in Diameter (PM _{2.5})	<ul style="list-style-type: none"> Cars and trucks (especially diesels). Fireplaces, woodstoves. Windblown dust from roadways, agriculture, and construction. 	<ul style="list-style-type: none"> Premature death. Hospitalization for worsening of cardiovascular disease. Hospitalization for respiratory disease. Asthma-related emergency room visits. Increased symptoms, increased inhaler usage.
Particulate Matter Less than 10 Microns in Diameter (PM ₁₀)	<ul style="list-style-type: none"> Cars and trucks (especially diesels). Fireplaces, woodstoves. Windblown dust from roadways, agriculture, and construction. 	<ul style="list-style-type: none"> Premature death and hospitalization, primarily for worsening of respiratory disease. Reduced visibility and material soiling.
Nitrogen Oxides (NO _x)	<ul style="list-style-type: none"> Any source that burns fuels such as cars, trucks, construction and farming equipment, and residential heaters and stoves. 	<ul style="list-style-type: none"> Lung irritation. Enhanced allergic responses.
Carbon Monoxide (CO)	<ul style="list-style-type: none"> Any source that burns fuels such as cars, trucks, construction and farming equipment, and residential heaters and stoves. 	<ul style="list-style-type: none"> Chest pain in patients with heart disease. Headache. Light-headedness. Reduced mental alertness.
Sulfur Oxides (SO _x)	<ul style="list-style-type: none"> Combustion of sulfur-containing fossil fuels. Smelting of sulfur-bearing metal ores. Industrial processes. 	<ul style="list-style-type: none"> Worsening of asthma: increased symptoms, increased medication usage, and emergency room visits.
Lead (Pb)	<ul style="list-style-type: none"> Contaminated soil. 	<ul style="list-style-type: none"> Impaired mental functioning in children. Learning disabilities in children. Brain and kidney damage.
Toxic Air Contaminants (TACs)	<ul style="list-style-type: none"> Cars and trucks (especially diesels). Industrial sources, such as chrome platers. Neighborhood businesses, such as dry cleaners and service stations. Building materials and products. 	<ul style="list-style-type: none"> Cancer. Reproductive and developmental effects. Neurological effects.

Source: California Air Resources Board (2018).

¹ Ozone is not generated directly by these sources. Rather, chemicals emitted by these precursor sources react with sunlight to form ozone in the atmosphere.

Statewide attainment of particulate matter standards could reduce premature deaths, hospital admissions for cardiovascular and respiratory disease, asthma-related emergency room visits, and episodes of respiratory illness in California.

Carbon Monoxide. CO is an odorless, colorless gas usually formed as the result of the incomplete combustion of fuels. The single largest source of CO is motor vehicles. CO transport is limited – it disperses with distance from the source under normal meteorological conditions. However, under certain extreme meteorological conditions, CO concentrations near congested roadways or intersections may reach unhealthful levels that adversely affect local sensitive receptors (e.g., residents,



schoolchildren, the elderly, and hospital patients). Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service or with extremely high traffic volumes. Exposure to high concentrations of CO reduces the oxygen-carrying capacity of the blood and can cause headaches, nausea, dizziness, and fatigue, impair central nervous system function, and induce angina (chest pain) in persons with serious heart disease. Extremely high levels of CO, such as those generated when a vehicle is running in an unventilated garage, can be fatal.

Nitrogen Dioxide. NO₂ is a reddish-brown gas that is a byproduct of combustion processes. Automobiles and industrial operations are the main sources of NO₂. Aside from its contribution to ozone formation, NO₂ also contributes to other pollution problems, including a high concentration of fine particulate matter, poor visibility, and acid deposition. NO₂ may be visible as a coloring component on high pollution days, especially in conjunction with high ozone levels. NO₂ decreases lung function and may reduce resistance to infection.

Sulfur Dioxide. SO₂ is a colorless, acidic gas with a strong odor. It is produced by the combustion of sulfur-containing fuels such as oil, coal, and diesel. SO₂ has the potential to damage materials and can cause health effects at high concentrations. It can irritate lung tissue and increase the risk of acute and chronic respiratory disease. SO₂ also reduces visibility and the level of sunlight at the ground surface.

Lead. Lead is a metal found naturally in the environment as well as in manufactured products. The major sources of lead emissions have historically been mobile and industrial sources. As a result of the phase-out of leaded gasoline, metal processing is currently the primary source of lead emissions. The highest levels of lead in air are generally found near lead smelters. Other stationary sources are waste incinerators, utilities, and lead-acid battery factories. Twenty years ago, mobile sources were the main contributor to ambient lead concentrations in the air. In the early 1970s, the United States Environmental Protection Agency (USEPA) established national regulations to gradually reduce the lead content in gasoline. In 1975, unleaded gasoline was introduced for motor vehicles equipped with catalytic converters. The USEPA banned the use of leaded gasoline in highway vehicles in December 1995. As a result of USEPA regulatory efforts to remove lead from gasoline, emissions of lead from the transportation sector and levels of lead in the air decreased dramatically.

Volatile Organic Compounds. VOCs (also known as ROGs and reactive organic compounds) form from the combustion of fuels and the evaporation of organic solvents. VOCs are not defined as criteria pollutants, however, because VOCs accumulate in the atmosphere more quickly during the winter, when sunlight is limited and photochemical reactions are slower, they are a prime component of the photochemical smog reaction. There are no attainment designations for VOCs.

Toxic Air Contaminants. In addition to the criteria pollutants discussed above, toxic air contaminants (TACs) are another group of pollutants of concern. Some examples of TACs include benzene, butadiene, formaldehyde, and hydrogen sulfide. Potential human health effects of TACs include birth defects, neurological damage, cancer, and death. There are hundreds of different types of TACs with varying degrees of toxicity. Individual TACs vary greatly in the health risk they present; at a given level of exposure, one TAC may pose a hazard that is many times greater than another. TACs do not have ambient air quality standards, but are regulated by the USEPA, the CARB, and the SCAQMD. In 1998, the CARB identified particulate matter from diesel-fueled engines as a TAC. The



CARB has completed a risk management process that identified potential cancer risks for a range of activities and land uses that are characterized by use of diesel-fueled engines.³ High volume freeways, stationary diesel engines, and facilities attracting heavy and constant diesel vehicle traffic (distribution centers, truck stops) were identified as posing the highest risk to adjacent receptors. Other facilities associated with increased risk include warehouse distribution centers, large retail or industrial facilities, high volume transit centers, and schools with a high volume of bus traffic. Health risks from TACs are a function of both concentration and duration of exposure.

Unlike TACs emitted from industrial and other stationary sources noted above, most diesel particulate matter is emitted from mobile sources—primarily “off-road” sources such as construction and mining equipment, agricultural equipment, and truck-mounted refrigeration units, as well as trucks and buses traveling on freeways and local roadways.

The CARB Diesel Risk Reduction Plan is intended to substantially reduce diesel particulate matter emissions and associated health risks through introduction of ultra-low-sulfur diesel fuel—a step already implemented—and cleaner-burning diesel engines.⁴ The technology for reducing diesel particulate matter emissions from heavy-duty trucks is well established, and both State and federal agencies are moving aggressively to regulate engines and emission control systems to reduce and remediate diesel emissions.

4.1.2.2 National and State Ambient Air Quality Standards

Both State and federal governments have established health-based ambient air quality standards for criteria air pollutants. Criteria pollutants are defined as those pollutants for which the federal and State governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health.

Both the USEPA and the CARB have established ambient air quality standards for CO, O₃, NO₂, SO₂, Pb, and suspended particulate matter. In addition, the State has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety. These ambient air quality standards are levels of contaminants that avoid specific adverse health effects associated with each pollutant.

Federal standards include both primary and secondary standards. Primary standards establish limits to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly. Secondary standards set limits to protect public welfare, including protection

³ CARB. 2000a. *Fact Sheet – California’s Plan to Reduce Diesel Particulate Matter Emissions*. October. Website: www.arb.ca.gov/diesel/factsheets/rrpfactsheet.pdf (accessed June 2023).

⁴ CARB. 2000b. *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles*. October. Prepared by the Stationary Source Division and Mobile Source Control Division. Website: www.arb.ca.gov/diesel/documents/rrpFinal.pdf (accessed June 2023).



against decreased visibility, and damage to animals, crops, vegetation, and buildings.⁵ State and federal standards for the criteria air pollutants are listed in Table 4.1.B below.

4.1.2.3 Existing Climate and Air Quality

The following provides a discussion of the local and regional air quality and climate in the City of Cypress.

Climate/Meteorology. Air quality in the City of Cypress is not only affected by various emission sources (e.g., mobile and industry), but also by atmospheric conditions (e.g., wind speed, wind direction, temperature, and rainfall). The combination of topography, low mixing height, abundant sunshine, and emissions from the second-largest urban area in the United States gives the Basin some of the worst air pollution in the nation.

The annual average temperature varies little throughout the Basin, ranging from the low to middle 60s degrees Fahrenheit (°F). With a more pronounced oceanic influence, coastal areas show less variability in annual minimum and maximum temperatures than inland areas. The climatological station closest to the City is the Anaheim Station.⁶ The monthly average maximum temperature recorded at this station ranged from 69.7°F in December to 87.1°F in August, with an annual average maximum of 77.4°F. The monthly average minimum temperature recorded at this station ranged from 46.9°F in December to 64.5°F in August, with an annual average minimum of 55.4°F. These levels are representative of the City.

The majority of annual rainfall in the Basin occurs between November and April. Summer rainfall is minimal and is generally limited to scattered thundershowers in coastal regions and slightly heavier showers in the eastern portion of the Basin and along the coastal side of the mountains. Average monthly rainfall at the Anaheim station varied from 0.01 inch in August to 3.47 inches in February, with an annual total of 14.09 inches. Patterns in monthly and yearly rainfall totals are unpredictable due to fluctuations in the weather.

The Basin experiences a persistent temperature inversion (increasing temperature with increasing altitude) as a result of the Pacific high. This inversion limits the vertical dispersion of air contaminants, holding them relatively near the ground. As the sun warms the ground and the lower air layer, the temperature of the lower air layer approaches the temperature of the base of the inversion (upper) layer until the inversion layer finally breaks, allowing vertical mixing with the lower layer. This phenomenon is observed in mid-afternoon to late afternoon on hot summer days when the air appears to clear up suddenly. Winter inversions frequently break by midmorning.

⁵ United States Environmental Protection Agency (USEPA). 2017. Criteria Air Pollutants. October. Website: www.epa.gov/criteria-air-pollutants (accessed June 2023).

⁶ Western Regional Climate Center. Recent Climate in the West. Website: <http://www.wrcc.dri.edu>, (accessed June 2023).



Table 4.1.B: Federal and State Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards ¹		Federal Standards ²			
		Concentration ³	Method ⁴	Primary ^{3,5}	Secondary ^{3,6}	Method ⁷	
Ozone (O ₃) ⁸	1-Hour	0.09 ppm (180 µg/m ³)	Ultraviolet Photometry	–	Same as Primary Standard	Ultraviolet Photometry	
	8-Hour	0.07 ppm (137 µg/m ³)		0.070 ppm (137 µg/m ³)			
Respirable Particulate Matter (PM ₁₀) ⁹	24-Hour	50 µg/m ³	Gravimetric or Beta Attenuation	150 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis	
	Annual Arithmetic Mean	20 µg/m ³		–			
Fine Particulate Matter (PM _{2.5}) ⁹	24-Hour	–	Gravimetric or Beta Attenuation	35 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis	
	Annual Arithmetic Mean	12 µg/m ³		12.0 µg/m ³			
Carbon Monoxide (CO)	8-Hour	9.0 ppm (10 mg/m ³)	Non-Dispersive Infrared Photometry (NDIR)	9 ppm (10 mg/m ³)	–	Non-Dispersive Infrared Photometry (NDIR)	
	1-Hour	20 ppm (23 mg/m ³)		35 ppm (40 mg/m ³)			
	8-Hour (Lake Tahoe)	6 ppm (7 mg/m ³)		–			
Nitrogen Dioxide (NO ₂) ¹⁰	Annual Arithmetic Mean	0.03 ppm (57 µg/m ³)	Gas Phase Chemiluminescence	53 ppb (100 µg/m ³)	Same as Primary Standard	Gas Phase Chemiluminescence	
	1-Hour	0.18 ppm (339 µg/m ³)		100 ppb (188 µg/m ³)			
Lead (Pb) ^{12,13}	30-Day Average	1.5 µg/m ³	Atomic Absorption	–	Same as Primary Standard	High-Volume Sampler and Atomic Absorption	
	Calendar Quarter	–		1.5 µg/m ³ (for certain areas) ^l			
	Rolling 3-Month Average ⁱ	–		0.15 µg/m ³			
Sulfur Dioxide (SO ₂) ¹¹	24-Hour	0.04 ppm (105 µg/m ³)	Ultraviolet Fluorescence	0.14 ppm (for certain areas)	–	Ultraviolet Fluorescence; Spectrophotometry (Pararosaniline Method)	
	3-Hour	–		–			0.5 ppm (1300 µg/m ³)
	1-Hour	0.25 ppm (655 µg/m ³)		75 ppb (196 µg/m ³) ¹¹			–
	Annual Arithmetic Mean	–		0.030 ppm (for certain areas) ¹¹			–
Visibility-Reducing Particles ¹²	8-Hour	See footnote ¹⁴	Beta Attenuation and Transmittance through Filter Tape	Federal Standards			
Sulfates	24-Hour	25 µg/m ³	Ion Chromatography				
Hydrogen Sulfide	1-Hour	0.03 ppm (42 µg/m ³)	Ultraviolet Fluorescence				
Vinyl Chloride ¹⁰	24-Hour	0.01 ppm (26 µg/m ³)	Gas Chromatography				

Source: Ambient Air Quality Standards (California Air Resources Board 2016).

Table notes continued on the following page



- ¹ California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1- and 24-hour), nitrogen dioxide, and particulate matter (PM₁₀, PM_{2.5}, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
- ² National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM₁₀, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than one. For PM_{2.5}, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact USEPA for further clarification and current national policies.
- ³ Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
- ⁴ Any equivalent measurement method which can be shown to the satisfaction of the CARB to give equivalent results at or near the level of the air quality standard may be used.
- ⁵ National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
- ⁶ National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
- ⁷ Reference method as described by the USEPA. An “equivalent method” of measurement may be used but must have a “consistent relationship to the reference method” and must be approved by the USEPA.
- ⁸ On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
- ⁹ On December 14, 2012, the national annual PM_{2.5} primary standard was lowered from 15 µg/m³ to 12.0 µg/m³. The existing national 24-hour PM_{2.5} standards (primary and secondary) were retained at 35 µg/m³, as was the annual secondary standard of 15 µg/m³. The existing 24-hour PM₁₀ standards (primary and secondary) of 150 µg/m³ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
- ¹⁰ To attain the 1-hour national standard, the three-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
- ¹¹ On June 2, 2010, a new 1-hour SO₂ standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the three-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO₂ national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved. Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
- ¹² The CARB has identified lead and vinyl chloride as ‘toxic air contaminants’ with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
- ¹³ The national standard for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 lead standard (1.5 µg/m³ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
- ¹⁴ In 1989, the CARB converted both the general Statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are “extinction of 0.23 per kilometer” and “extinction of 0.07 per kilometer” for the Statewide and Lake Tahoe Air Basin standards, respectively.

°C = degrees Celsius

µg/m³ = micrograms per cubic meter

CARB = California Air Resources Board

mg/m³ = milligrams per cubic meter

ppb = parts per billion

ppm = parts per million

USEPA = United States Environmental Protection Agency



Winds in the City blow predominantly from the south-southwest, with relatively low velocities. Wind speeds in the City average about 5 miles per hour (mph). Summer wind speeds average slightly higher than winter wind speeds. Low average wind speeds, together with a persistent temperature inversion, limit the vertical dispersion of air pollutants throughout the Basin. Strong, dry, north or northeasterly winds, known as Santa Ana winds, occur during the fall and winter months, dispersing air contaminants. The Santa Ana conditions tend to last for several days at a time.

The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations. On days of no inversion or high wind speeds, ambient air pollutant concentrations are the lowest. During periods of low inversions and low wind speeds, air pollutants generated in urbanized areas are transported predominantly onshore into Riverside and San Bernardino counties. In the winter, the greatest pollution problems are CO and NO_x because of extremely low inversions and air stagnation during the night and early morning hours. In the summer, the longer daylight hours and brighter sunshine combine to cause a reaction between hydrocarbons and NO_x to form photochemical smog. Smog is a general term that is naturally occurring fog that has become mixed with smoke or pollution. In this context it is better described as a form of air pollution produced by the photochemical reaction of sunlight with pollutants that have been released into the atmosphere, especially by automotive emissions.

Attainment Status. CARB is required to designate areas of the State as attainment, nonattainment, or unclassified for all State standards. An attainment designation for an area signifies that pollutant concentrations did not violate the standard for that pollutant in that area. A nonattainment designation indicates that a pollutant concentration violated the standard at least once, excluding those occasions when a violation was caused by an exceptional event, as defined in the criteria. An unclassified designation signifies that data do not support either an attainment or nonattainment status. The California Clean Air Act (CCAA) divides districts into moderate, serious, and severe air pollution categories, with increasingly stringent control requirements mandated for each category.

The USEPA designates areas for O₃, CO, and NO₂ as one of the following: does not meet the primary standards, or cannot be classified, or better than national standards. For SO₂, areas are designated as: does not meet the primary standards, does not meet the secondary standards, cannot be classified, or better than national standards. Table 4.1.C provides a summary of the attainment status for the Basin with respect to both National and California Ambient Air Quality Standards (NAAQS and CAAQS, respectively).

Air Quality Monitoring Results. Air quality monitoring stations are located throughout the nation and are maintained by the local air pollution control district and State air quality regulating agencies. The SCAQMD, together with the CARB, maintains ambient air quality monitoring stations in the Basin. The air quality monitoring station closest to the City is the station at 1630 West Pampas Lane in Anaheim.



Table 4.1.C: South Coast Air Basin Attainment Status

Pollutant	State	Federal
O ₃ 1 hour	Nonattainment	Extreme Nonattainment
O ₃ 8 hour	Nonattainment	Extreme Nonattainment
PM ₁₀	Nonattainment	Attainment/Maintenance
PM _{2.5}	Nonattainment	Serious Nonattainment
CO	Attainment	Attainment/Maintenance
NO ₂	Attainment	Attainment/Maintenance
SO ₂	N/A	Attainment/Unclassified
Lead	Attainment	Partial Nonattainment ¹
All others	Attainment/Unclassified	Attainment/Unclassified

Source: South Coast Air Quality Management District (2016b).

¹ Partial Nonattainment designation – Los Angeles County portion of Basin only for near-source monitors. Expect redesignation to attainment based on current monitoring data.

CO = carbon monoxide

N/A = not applicable

NO₂ = nitrogen dioxide

O₃ = ozone

PM₁₀ = particulate matter less than 10 microns in size

PM_{2.5} = particulate matter less than 2.5 microns in size

SO₂ = sulfur dioxide

Pollutant monitoring results for 2020 to 2022 at the Anaheim monitoring station, shown in Table 4.1.D, indicate that air quality in the vicinity of the City has generally been good. As indicated in the monitoring results, the federal PM₁₀ standard was not exceeded during the 3-year period. The State PM₁₀ standard was exceeded 5 times in 2020, 1 time in 2021, and an unknown number of times in 2022. Similarly, the federal PM_{2.5} standard had 12 exceedances in 2020, 10 exceedances in 2021, and no exceedances in 2022. The State 1-hour ozone standards were exceeded 6 times in 2020, no times in 2021, and an unknown number of times in 2022. The State 8-hour ozone standards were exceeded 16 times in 2020, no times in 2021, and an unknown number of times in 2022. The federal 8-hour standards were exceeded 15 times in 2020, no times in 2021, and 1 time in 2022. The CO and NO₂ standards were not exceeded in this area during the 3-year period. SO₂ data were not available from 2020–2022 at air quality monitoring stations in Orange County.

4.1.3 Regulatory Setting

The USEPA and the CARB regulate direct emissions from motor vehicles. The SCAQMD is the regional agency primarily responsible for regulating air pollution emissions from stationary sources (e.g., factories) and indirect sources (e.g., traffic associated with new development), as well as monitoring ambient pollutant concentrations.

The applicable federal, State, regional, and local regulatory framework is discussed below.

4.1.3.1 Federal Regulations

Federal Clean Air Act. At the federal level, the USEPA has been charged with implementing national air quality programs. The USEPA air quality mandates are drawn primarily from the federal Clean Air Act (CAA), which was enacted in 1963. The federal CAA was amended in 1970, 1977, and 1990.



Table 4.1.D: Ambient Air Quality in the Project Vicinity

Pollutant	Standard	2020	2021	2022
Carbon Monoxide (CO)¹				
Maximum 1-hour concentration (ppm)		2.3	2.1	2.4
Number of days exceeded:	State: > 20 ppm	0	0	0
	Federal: > 35 ppm	0	0	0
Maximum 8-hour concentration (ppm)		1.7	1.5	1.4
Number of days exceeded:	State: > 9 ppm	0	0	0
	Federal: > 9 ppm	0	0	0
Ozone (O₃)¹				
Maximum 1-hour concentration (ppm)		0.142	0.089	0.102
Number of days exceeded:	State: > 0.09 ppm	6	0	ND
Maximum 8-hour concentration (ppm)		0.097	0.068	0.076
Number of days exceeded:	State: > 0.07 ppm	16	0	ND
	Federal: > 0.07 ppm	15	0	1
Coarse Particulates (PM₁₀)¹				
Maximum 24-hour concentration (µg/m ³)		74.8	63.6	67.0
Number of days exceeded:	State: > 50 µg/m ³	5	1	ND
	Federal: > 150 µg/m ³	0	0	0
Annual arithmetic average concentration (µg/m ³)		ND	23.2	ND
Exceeded for the year:	State: > 20 µg/m ³	ND	Yes	ND
	Federal: > 50 µg/m ³	ND	No	ND
Fine Particulates (PM_{2.5})¹				
Maximum 24-hour concentration (µg/m ³)		60.2	54.4	33.1
Number of days exceeded:	Federal: > 35 µg/m ³	12	10	0
Annual arithmetic average concentration (µg/m ³)		12.2	11.5	9.9
Exceeded for the year:	State: > 12 µg/m ³	Yes	No	No
	Federal: > 15 µg/m ³	No	No	No
Nitrogen Dioxide (NO₂)¹				
Maximum 1-hour concentration (ppm)		0.071	0.067	0.053
Number of days exceeded:	State: > 0.250 ppm	0	0	0
Annual arithmetic average concentration (ppm)		0.013	0.012	0.012
Exceeded for the year:	Federal: > 0.053 ppm	No	No	No
Sulfur Dioxide (SO₂)¹				
Maximum 1-hour concentration (ppm)		ND	ND	ND
Number of days exceeded:	State: > 0.25 ppm	ND	ND	ND
Maximum 24-hour concentration (ppm)		ND	ND	ND
Number of days exceeded:	State: > 0.04 ppm	ND	ND	ND
	Federal: > 0.14 ppm	ND	ND	ND
Annual arithmetic average concentration (ppm)		ND	ND	ND
Exceeded for the year:	Federal: > 0.030 ppm	ND	ND	ND

Sources: CARB and USEPA (2021).

¹ Data taken from the Anaheim monitoring station at 1630 West Pampas Lane.

CARB = California Air Resources Board

ND = No data. There were insufficient (or no) data to determine the value.

ppm = parts per million

USEPA = United States Environmental Protection Agency



The federal CAA required the USEPA to establish primary and secondary NAAQS and required each state to prepare an air quality control plan referred to as a State Implementation Plan (SIP). The federal CAA Amendments of 1990 added requirements for states with nonattainment areas to revise their SIPs to incorporate additional control measures to reduce air pollution. The SIP is periodically modified to reflect the latest emissions inventories, planning documents, and rules and regulations of the air basins as reported by their jurisdictional agencies. The USEPA has responsibility to review every state's SIPs to determine conformity with the mandates of the federal CAA and determine if implementation would achieve air quality goals. If the USEPA determines a SIP to be inadequate, a Federal Implementation Plan may be prepared for the nonattainment area, which imposes additional control measures. Failure to submit an approvable SIP or to implement the plan within the mandated timeframe may result in sanctions on transportation funding and stationary air pollution sources in the air basin.

The USEPA is also required to develop National Emission Standards for Hazardous Air Pollutants, which are defined as those which may reasonably be anticipated to result in increased deaths or serious illness, and which are not already regulated. An independent science advisory board reviews the health and exposure analyses conducted by the USEPA on suspected hazardous pollutants prior to regulatory development.

4.1.3.2 State Regulations

California Clean Air Act. In 1988, the CCAA required that all air quality districts in the State endeavor to achieve and maintain CAAQS for CO, ozone, SO₂, and NO₂ by the earliest practical date. The CCAA provides districts with authority to regulate indirect sources and mandates that air quality districts focus particular attention on reducing emissions from transportation and area-wide emission sources. Each nonattainment district is required to adopt a plan to achieve a 5 percent annual reduction, averaged over consecutive 3-year periods, in district-wide emissions of each nonattainment pollutant or its precursors. A Clean Air Plan shows how a district would reduce emissions to achieve air quality standards. Generally, the State standards for these pollutants are more stringent than the national standards.

California Air Resources Board. The CARB is the State's "clean air agency". The CARB's goals are to attain and maintain healthy air quality, protect the public from exposure to toxic air contaminants, and oversee compliance with air pollution rules and regulations.

Assembly Bill 2588 Air Toxics "Hot Spots" Information and Assessment Act. Under Assembly Bill 2588, stationary sources of air pollutants are required to report the types and quantities of certain substances that their facilities routinely released into the air. The goals of the Air Toxics "Hot Spots" Act are to collect emission data, identify facilities having localized impacts, determine health risks, and notify nearby residents of significant risks.

The California Air Resources Board Handbook. CARB has developed an Air Quality and Land Use Handbook⁷ (CARB Handbook), which is intended to serve as a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use

⁷ CARB. 2005. *Air Quality and Land Use Handbook: A Community Health Perspective* (CARB Handbook). April.



decision-making process. According to the CARB Handbook, air pollution studies have shown an association between respiratory and other non-cancer health effects and proximity to high-traffic roadways. Other studies have shown that diesel exhaust and other cancer-causing chemicals emitted from cars and trucks are responsible for much of the overall cancer risk from airborne toxics in California. The CARB Handbook recommends that county and city planning agencies strongly consider proximity to these sources when finding new locations for “sensitive” land uses such as homes, medical facilities, daycare centers, schools, and playgrounds.

Land use designations with air pollution sources of concern include freeways, rail yards, ports, refineries, distribution centers, chrome plating facilities, dry cleaners, and large gasoline service stations. Key recommendations in the CARB Handbook include taking steps to avoid siting new, sensitive land uses:

- Within 500 feet of a freeway, urban roads with 100,000 vehicles/day or rural roads with 50,000 vehicles/day;
- Within 1,000 feet of a major service and maintenance rail yard;
- Immediately downwind of ports (in the most heavily impacted zones) and petroleum refineries;
- Within 300 feet of any dry cleaning operation (for operations with two or more machines, provide 500 feet); and
- Within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater).

The CARB Handbook specifically states that its recommendations are advisory and acknowledges land use agencies have to balance other considerations, including housing and transportation needs, economic development priorities, and other quality-of-life issues.

The recommendations are generalized and do not consider site-specific meteorology, freeway truck percentages, or other factors that influence risk for a particular project site. The purpose of this guidance is to further examine project sites for actual health risk associated with the location of new sensitive land uses.

4.1.3.3 Regional Regulations

South Coast Air Quality Management District. The SCAQMD has jurisdiction over most air quality matters in the Basin. This area includes all of Orange County, Los Angeles County except for the Antelope Valley, the non-desert portion of western San Bernardino County, and the western and Coachella Valley portions of Riverside County. The SCAQMD is the agency principally responsible for comprehensive air pollution control in the Basin and is tasked with implementing certain programs and regulations required by the CAA and the CCAA. The SCAQMD prepares plans to attain CAAQS and NAAQS. SCAQMD is directly responsible for reducing emissions from stationary (area and point) sources. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects



emissions sources, and enforces such measures through educational programs or fines, when necessary.

- **Regulation IV - Prohibitions:** This regulation sets forth the restrictions for visible emissions, odor nuisance, fugitive dust, various air pollutant emissions, fuel contaminants, start-up/shutdown exemptions, and breakdown events.
 - **Rule 402 - Nuisance:** This rule restricts the discharge of any contaminant in quantities that cause or have a natural ability to cause injury, damage, nuisance, or annoyance to businesses, property, or the public. Future development projects that are implemented in accordance with the proposed zoning and updated land use designations will be required to comply with Rule 402.
 - **Rule 403 - Fugitive Dust:** This rule requires the prevention, reduction, or mitigation fugitive dust emissions from a project site. Rule 403 restricts visible fugitive dust to a project property line, restricts the net PM₁₀ emissions to less than 50 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) and restricts the tracking out of bulk materials onto public roads. Additionally, Rule 403 requires an applicant to use one or more of the best available control measures (identified in the tables within the rule). Control measures may include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers, and/or ceasing all activities. Finally, Rule 403 requires that a contingency plan be prepared if so determined by the USEPA. In addition, SCAQMD Rule 403(e), Additional Requirements for Large Operations, includes requirements to provide Large Operation Notification Form 403 N, appropriate signage, additional dust control measures, and employment of a dust control supervisor that has successfully completed the Dust Control training class in the South Coast Air Basin. Future development projects that are implemented in accordance with the proposed zoning and updated land use designations will be required to comply with Rule 403.
- **Regulation XI - Source Specific Standards:** Regulation XI sets emissions standards for different sources.
 - **Rule 1113 - Architectural Coatings:** This rule limits the amount of VOCs from architectural coatings and solvents, which lowers the emissions of odorous compounds. Future development projects that are implemented in accordance with the proposed zoning and updated land use designations will be required to comply with Rule 1113.

The SCAQMD is responsible for demonstrating regional compliance with ambient air quality standards but has limited direct involvement in reducing emissions from fugitive, mobile, and natural sources. To that end, the SCAQMD works cooperatively with CARB, the Southern California Association of Governments (SCAG), county transportation commissions, local governments, and other federal and State government agencies. It has responded to this requirement by preparing a series of Air Quality Management Plans (AQMP) to meet the CAAQS and NAAQS. SCAQMD and SCAG are responsible for formulating and implementing the AQMP for the South Coast Air Basin. The main purpose of an AQMP is to bring the area into compliance with federal and State air quality standards. Every several years, SCAQMD prepares a new AQMP, updating the previous plan and the



20-year horizon.⁸ The Final 2022 Air Quality Management Plan is the currently adopted AQMP. Key elements of the Final 2022 AQMP include:

- Calculating and taking credit for co-benefits from other planning efforts (e.g., climate, energy, and transportation)
- A strategy with fair-share emission reductions at the federal, State, and local levels
- Investment in strategies and technologies meeting multiple air quality objectives
- Seeking new partnerships and significant funding for incentives to accelerate deployment of zero-emission and near-zero emission technologies
- Enhanced socioeconomic assessment, including an expanded environmental justice analysis
- Attainment of the 24-hour PM_{2.5} standard in 2019 with no additional measures
- Attainment of the annual PM_{2.5} standard by 2025 with implementation of a portion of the O₃ strategy
- Attainment of the 1-hour O₃ standard by 2022 with no reliance on “black box” future technology (CAA Section 182(e)(5) measures)

The 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low NO_x technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other CAA measures to achieve the 2015 8-hour ozone standard.

Southern California Association of Governments. SCAG is a council of governments for Los Angeles, Orange, Riverside, San Bernardino, Imperial, and Ventura counties. It is a regional planning agency and serves as a forum for regional issues relating to transportation, the economy and community development, and the environment. SCAG is the federally designated Metropolitan Planning Organization (MPO) for the majority of the Southern California region and is the largest MPO in the nation. With regard to air quality planning, SCAG prepares the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP), which address regional development and growth forecasts and form the basis for the land use and transportation control portions of the AQMP and are used in the preparation of the air quality forecasts and consistency analysis included in the AQMP. The RTP, RTIP, and AQMP are based on projections originating within local jurisdictions.

⁸ South Coast Air Quality Management District (SCAQMD). 2016a. *Final 2016 Air Quality Management Plan*. March.



Although SCAG is not an air quality management agency, it is responsible for developing transportation, land use, and energy conservation measures that affect air quality. SCAG's Regional Comprehensive Plan (RCP) provides growth forecasts that are used in the development of air quality-related land use and transportation control strategies by the SCAQMD. The RCP is a framework for decision-making for local governments, assisting them in meeting federal and State mandates for growth management, mobility, and environmental standards, while maintaining consistency with regional goals regarding growth and changes. Policies within the RCP include consideration of air quality, land use, transportation, and economic relationships by all levels of government.

SCAG adopted the 2020-2045 RTP/Sustainable Communities Strategy (SCS) (collectively called Connect SoCal) on September 3, 2020. Connect SoCal is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. Connect SoCal is an important planning document for the region, allowing project sponsors to qualify for federal funding and takes into account operations and maintenance costs, to ensure reliability, longevity, and cost effectiveness.

Using growth forecasts and economic trends, the RTP provides a vision for transportation throughout the region for the next 20 years. It considers the role of transportation in the broader context of economic, environmental, and quality-of-life goals for the future, identifying regional transportation strategies to address mobility needs. The SCS is a required element of the RTP, which integrates land use and transportation strategies to achieve CARB emissions reduction targets. The inclusion of the SCS is required by Senate Bill (SB) 375, which was enacted to reduce GHG emissions from automobiles and light trucks through integrated transportation, land use, housing, and environmental planning. The RTP/SCS would successfully achieve and exceed the GHG emission-reduction targets set by the CARB by achieving an 8 percent reduction by 2020, an 18 percent reduction by 2035, and a 21 percent reduction by 2040 compared to the 2005 level on a per capita basis. This RTP/SCS also meets criteria pollutant emission budgets set by the USEPA.

4.1.3.4 Local Regulations

City of Cypress General Plan. The City of Cypress addresses air quality in the Air Quality Element of the City's General Plan⁹. The Air Quality Element contains goals, policies, and implementation actions that are intended to protect the public's health and welfare by reducing current pollution emissions and by requiring new development to comply with air quality standards. The following goals, policies, and implementing actions related to air quality are presented in the Air Quality Element and are applicable to the proposed project:

- **AQ-1.3:** Locate multiple family developments close to commercial areas to encourage pedestrian rather than vehicular travel.
- **AQ-1.4:** Develop neighborhood parks near concentrations of residents to encourage pedestrian travel to the recreation facilities.

⁹ City of Cypress. 2001. *City of Cypress General Plan Air Quality Element*. October 5.



- **AQ-3.1:** Adopt incentives, regulations, and/or procedures to minimize particulate emissions from unpaved roads, agricultural uses, and building construction.
- **AQ-4.1:** Promote energy conservation in all sectors of the City including residential, commercial, and industrial.
- **AQ-4.2:** Promote local recycling of wastes and the use of recycled materials.
- **AQ-4.3:** Adopt incentives and regulations to reduce emissions from swimming pool heaters and residential and commercial water heaters.

4.1.4 Thresholds of Significance

The thresholds for air quality impacts used in this analysis are consistent with Appendix G of the *State CEQA Guidelines* and the City's *Initial Study/Environmental Checklist*. The proposed project may be deemed to have a significant impact with respect to air quality if it would:

Threshold 4.1.1: Conflict with or obstruct implementation of the applicable air quality plan?

Threshold 4.1.2: 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?

Threshold 4.1.3: Expose sensitive receptors to substantial pollutant concentrations?

Threshold 4.1.4: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

As stated in Appendix G of the *State CEQA Guidelines*, where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make determinations about a project's impacts. This Draft EIR uses the adopted thresholds of the SCAQMD, the local air quality management district.

It should be noted that according to Section 4.3, Air Quality, of the Initial Study prepared for the proposed project (Appendix A), the proposed project would result in less than significant impacts regarding other emissions (such as odors) that would adversely affect a substantial number of people (Threshold 4.1.4). Therefore, this topic is not further addressed below.

4.1.4.1 Regional Emissions Thresholds

SCAQMD has established daily emissions thresholds for construction and operation of a proposed project in the Basin. The emissions thresholds were established based on the attainment status of the Basin with regard to air quality standards for specific criteria pollutants. Because the concentration standards were set at a level that protects public health with an adequate margin of safety, these emissions thresholds are regarded as conservative and would overstate an individual project's contribution to health risks.



Table 4.1.E lists the CEQA significance thresholds for construction and operational emissions established for the Basin.

Table 4.1.E: Regional Thresholds for Construction and Operational Emissions

Emissions Source	Pollutant Emissions Threshold (lbs/day)					
	VOCs	NO _x	CO	PM ₁₀	PM _{2.5}	SO _x
Construction	75	100	550	150	55	150
Operations	55	55	550	150	55	150

Source: SCAQMD. Air Quality Significance Thresholds. 2023. Revised March 2023. Website: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25> (accessed January 2024).

CO = carbon monoxide

lbs/day = pounds per day

NO_x = nitrogen oxides

PM₁₀ = particulate matter less than 10 microns in size

PM_{2.5} = particulate matter less than 2.5 microns in size

SCAQMD = South Coast Air Quality Management District

SO_x = sulfur oxides

VOCs = volatile organic compounds

Projects in the Basin with construction- or operation-related emissions that exceed any of their respective emission thresholds would be considered significant under SCAQMD guidelines. These thresholds, which SCAQMD developed and that apply throughout the Basin, apply as both project and cumulative thresholds. If a project exceeds these standards, it is considered to have a project-specific and cumulative impact.

4.1.4.2 Local Microscale Concentration Standards

The significance of localized project impacts under CEQA depends on whether ambient CO levels in the vicinity of the project are above or below State and federal CO standards. Because ambient CO levels are below the standards throughout the Basin, a project would be considered to have a significant CO impact if project emissions result in an exceedance of one or more of the 1-hour or 8-hour standards. The following are applicable local emission concentration standards for CO:

- California State 1-hour CO standard of 20 parts per million (ppm)
- California State 8-hour CO standard of 9 ppm

4.1.5 Project Impacts

Threshold 4.1.1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Significant Unavoidable Impact. A consistency determination plays an essential role in local agency project review by linking local planning and unique individual projects to the air quality plans. A consistency determination fulfills the CEQA goal of fully informing local agency decision-makers of the environmental costs of the project under consideration at a stage early enough to ensure that air quality concerns are addressed. Only new or amended General Plan elements, Specific Plans, and significantly unique projects need to undergo a consistency review due to the air quality plan strategies being based on projections from local General Plans.

Consistency with the 2022 AQMP would be achieved if the project is consistent with the goals, objectives, and assumptions in this plan to achieve the federal and State air quality standards. Per



SCAQMD's *CEQA Air Quality Handbook*, there are two main indicators of a project's consistency with the AQMP:

- **Indicator 1:** Whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or emission reductions in the AQMP.
- **Indicator 2:** Whether the project would exceed the assumptions in the AQMP. The AQMP strategy is, in part, based on projections from local general plans.

Indicator 1: As demonstrated under Threshold 4.1.2 below, the proposed project would result in significant and unavoidable long-term operational pollutant emissions. As such, the proposed project would not be consistent with Indicator 1.

Indicator 2: The *CEQA Air Quality Handbook* indicates that consistency with AQMP growth assumptions must be analyzed for new or amended General Plan elements, Specific Plans, and significant projects. Significant projects include airports, electrical generating facilities, petroleum and gas refineries, designation of oil drilling districts, water ports, solid waste disposal sites, and offshore drilling facilities.

The proposed project includes amendments to the City's Zoning Ordinance and an update of the City's General Plan to reflect the 2021–2029 Housing Element adopted on June 27, 2022, and would not directly result in physical development. As such, this analysis evaluates whether the project would exceed the 2022 AQMP's assumptions for 2045 or yearly increments based on the horizon year of 2045 and project construction and phasing. It should be noted that the year 2045 was selected as the horizon year for consistency with the analysis presented in Section 4.9, Transportation, of this Draft PEIR. As stated in Section 4.9, 2045 represents the future year scenario under the Orange County Transportation Analysis Model (OCTAM), which is also consistent with the SCAG 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

With respect to determining the proposed project's consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's RTP/SCS regarding population, housing, and growth trends. According to SCAG's 2020–2045 RTP/SCS, the City's population, households, and employment are forecast to increase by approximately 1,700 residents, 800 households, and 3,100 jobs, respectively, between 2016 and 2045.¹⁰

Although the 2021–2029 Housing Element identifies several adequate sites that are able to accommodate the development of up to 1,946 new housing units, Cypress has an unaccommodated housing need of 1,990 units to meet its estimated housing growth needs identified in the Southern California Association of Governments' Regional Housing Needs Assessment (RHNA) allocation of 3,936 units. Overall, the proposed rezoning actions under the proposed project would increase the

¹⁰ Southern California Association of Governments (SCAG). 2020. *Connect SoCal 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy*. Website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579 (accessed June 2023).



City's development capacity by 2,314 housing units on the opportunity sites compared to the City's existing planning and zoning documents.

The proposed project would divide the City's RHNA between the Lincoln Avenue Specific Plan and the Cypress Town Center and Commons Specific Plan 2.0 (CTCC Specific Plan), with some of the RHNA also falling within the 2012 Cypress Business and Professional Center Specific Plan (CBPC Specific Plan) along Katella Avenue. The CTCC Specific Plan would be amended to allow up to 1,926 dwelling units, which includes the currently maximum of 1,250 dwelling units plus an additional 676 dwelling units. The residential densities in a majority of the land use districts in the CTCC Specific Plan would remain unchanged. Densities within the remaining CTCC Specific Plan area, approximately 42 acres, would increase, creating an additional medium density district (15 dwelling units per acre) and allowing higher density development (30 dwelling units per acre) in other areas. The City would be required to hold an election to implement these changes to the CTCC Specific Plan.

Under current zoning, the City has the capacity to accommodate the development of up to 1,946 new housing units, which includes 504 housing units that are already entitled and/or under construction. Therefore, the proposed rezoning action that is part of the proposed project would increase the City's development capacity to 4,260 units or an increase of 2,314 units compared to the City's existing planning and zoning documents.

As described further in Section 4.7, Population and Housing, the proposed project would accommodate the construction of 2,314 housing units. According to the 2017 American Housing Survey, the average household size in structures that have 50 or more housing units (the largest type of housing structure evaluated in the American Housing Survey) in the Los Angeles-Long Beach-Anaheim Metropolitan Statistical Area was 1.99 persons. Although the specific number of units per structure under the future buildout scenario cannot be known at this time, it is reasonable to assume that future build out would allow for higher density development and would likely facilitate larger multi-family housing projects that would provide more housing units under a single roof than single-family homes or townhomes, which are typically built at lower densities than those allowed under the proposed project. Therefore, it is reasonable to assume that the majority of the future housing units that would be allowed by the project would be in structures that would contain 50 or more units. As such, the 1.99 persons per household metric was deemed appropriate for use in the analysis. Based on this assumption, the additional 2,314 housing units that would potentially be built in the City under the proposed project are estimated to result in an increase in 4,605 residents.

Future development implemented in accordance with the proposed zoning and updated land use designations would accommodate planned regional housing growth included in the SCAG RHNA and would be required to adhere to the General Plan. Therefore, since the purpose of the proposed project is to accommodate planned regional housing growth included in the SCAG RHNA, the proposed project would not exceed the growth assumptions in the SCAG's RTP/SCS or the AQMP.

In addition, since the proposed project would not include airports, electrical generating facilities, petroleum and gas refineries, designation of oil drilling districts, water ports, solid waste disposal sites, and offshore drilling facilities, the proposed project is not a significant project as defined by the SCAQMD *CEQA Air Quality Handbook*. Therefore, it is unlikely that the proposed project would



interfere with SCAQMD’s goals for improving air quality in the region. The proposed project would not conflict with the 2022 AQMP and, as such, would not jeopardize attainment of the CAAQS and NAAQS in the area under the jurisdiction of the SCAQMD. The proposed project is therefore considered consistent with Indicator 2.

Summary: Based on the discussion above, the proposed project would have the potential to conflict or obstruct implementation of applicable air quality plans under Indicator 1 because the proposed project would result in significant and unavoidable long-term operational pollutant emissions. As discussed in Threshold 4.1.2 below, although there is no feasible mitigation to reduce operational pollutant emissions to a less than significant level, Mitigation Measure AQ-1 would require the implementation of all feasible measures to reduce operational impacts associated with the proposed project. In addition, Regulatory Compliance Measure (RCM) AQ-5 would require that all future projects comply with the latest Energy Code and Title 24 requirements for new residential development. Impacts would be significant and unavoidable.

Threshold 4.1.2: Would the project 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?

Significant Unavoidable Impact. The Basin is currently designated as nonattainment for the federal and State standards for O₃ and PM_{2.5}. In addition, the Basin is in nonattainment for the PM₁₀ standard. The Basin’s nonattainment status is attributed to the region’s development history. Past, present, and future development projects contribute to the region’s adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, a project’s individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project’s contribution to the cumulative impact is considerable, then the project’s impact on air quality would be considered significant.

In developing thresholds of significance for air pollutants, the SCAQMD considered the emission levels for which a project’s individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region’s existing air quality conditions. Therefore, additional analysis to assess cumulative impacts is not necessary. The following analysis assesses the potential project-level air quality impacts associated with construction and operation of the proposed project.

Construction. It is important to note that the proposed project would not, in and of itself entitle, propose, or otherwise require the construction of new development. The proposed project would rezone sites and/or amend the General Plan to accommodate the construction of up to 2,314 additional dwelling units on the opportunity sites.

Construction activities associated with the construction of additional housing units that could occur with implementation of the project would be through the horizon year 2045, which would cause short-term emissions of criteria air pollutants. The primary source of emissions is the operation of construction equipment. Before development can take place, each discretionary development



project is required to be analyzed for conformance with the General Plan, zoning requirements, and other applicable local and State requirements; comply with the requirements of CEQA; and obtain all necessary clearances and permits.

Construction activities would include site preparation, grading, building construction, architectural coating, and paving activities. Construction-related effects on air quality are typically greatest during the grading phase due to the disturbance of soils. If not properly controlled, these activities would temporarily generate particulate emissions. Sources of fugitive dust would include disturbed soils at construction sites. Unless properly controlled, vehicles leaving construction sites would deposit dirt and mud on local streets, which could be an additional source of airborne dust after it dries. PM₁₀ emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. PM₁₀ emissions would depend on soil moisture, silt content of soil, wind speed, and the amount of operating equipment. Larger dust particles would settle near the source, whereas fine particles would be dispersed over greater distances from the construction site.

Water or other soil stabilizers can be used to control dust, resulting in emission reductions of 50 percent or more. The SCAQMD has established Rule 403 (Fugitive Dust), which would require the contractor to implement measures that would reduce the amount of particulate matter generated during the construction period.

In addition to dust-related PM₁₀ emissions, heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, SO₂, NO_x, VOCs and some soot particulate (PM_{2.5} and PM₁₀) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles idle in traffic. These emissions would be temporary in nature and limited to the immediate area surrounding the construction site.

Information regarding specific development projects is not yet known; however, due to the scale of development activity associated with the proposed project, this analysis assumes that 2,314 housing units would be constructed over the approximately 22-year planning period. Construction emissions were estimated for the proposed project using CalEEMod. This analysis assumes that construction of the additional housing units allowed under the proposed project would begin in 2023 and end in 2045, which was included in CalEEMod. Site preparation, grading, and building activities would involve the use of standard earthmoving equipment such as large excavators, cranes, and other related equipment.

As specified in Regulatory Compliance Measure (RCM) AQ-1 through RCM AQ-4, detailed below, construction of the proposed project would comply with SCAQMD standard conditions, including Rule 403 (Fugitive Dust) to control fugitive dust and Rule 1113 (Architectural Coatings) to control VOC emissions from paint. Compliance with SCAQMD standard conditions is a regulatory requirement and was considered in the analysis of construction emissions.

The maximum daily emissions of VOCs, NO_x, SO_x, CO, PM₁₀, and PM_{2.5} that would result from construction of the proposed project are shown in Table 4.1.F and compared to the SCAQMD regional significance thresholds. As shown in Table 4.1.F, construction emissions associated with the proposed project would not exceed the significance thresholds established by the SCAQMD for any of the criteria pollutants.



Table 4.1.F: Project Construction Emissions (in Pounds Per Day)

Project Construction	Maximum Pollutant Emissions (lbs/day)					
	VOCs	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Peak Daily Emissions	10.8	48.9	112.0	0.1	29.1	11.2
SCAQMD Thresholds	75.0	100.0	550.0	150	150.0	55.0
Exceeds Thresholds?	No	No	No	No	No	No

Source: Compiled by LSA (August 2023).

CO = carbon monoxide

lbs/day = pounds per day

NO_x = nitrogen oxides

PM_{2.5} = particulate matter less than 2.5 microns in size

PM₁₀ = particulate matter less than 10 microns in size

SCAQMD = South Coast Air Quality Management District

SO_x = sulfur oxides

VOCs = volatile organic compounds

As shown in Table 4.1.F, construction emissions associated with the proposed project would not exceed the SCAQMD thresholds for VOCs, NO_x, CO, SO_x, PM_{2.5}, or PM₁₀ emissions. As discussed above, according to SCAQMD guidance, projects that exceed the significance thresholds are considered by SCAQMD to result in cumulatively considerable air quality impacts. Conversely, projects that do not exceed the significance thresholds are generally not considered to result in cumulatively considerable air quality impacts. Therefore, based on the fact that emissions during construction of the proposed project would not exceed any of the air quality significance thresholds for any criteria pollutants, the proposed project would not have a cumulatively considerable air quality impact. Therefore, with compliance with regulatory requirements (as specified in RCM AQ-1 through RCM AQ-4), construction impacts related to the cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under applicable NAAQS or CAAQS would be less than significant, and no mitigation is required.

Operation. As previously stated, the proposed project would not, in and of itself entitle, propose, or otherwise require the construction of new development. The proposed project would rezone sites and/or amend the General Plan to accommodate the construction of up to 2,314 additional dwelling units on the opportunity sites.

Operational activities associated with the additional housing units would result in long-term air pollutant emissions associated with mobile sources (e.g., vehicle trips), energy sources (e.g., natural gas), and area sources (e.g., architectural coatings and the use of landscape maintenance equipment). Before development can take place, each discretionary development project is required to be analyzed for conformance with the General Plan, zoning requirements, and other applicable local and State requirements; comply with the requirements of CEQA; and obtain all necessary clearances and permits.

PM₁₀ emissions result from running exhaust, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways. Entrainment of PM₁₀ occurs when vehicle tires pulverize small rocks and pavement and the vehicle wakes generate airborne dust. The contribution of tire and brake wear is small compared to the other particulate matter emission processes. Gasoline-powered engines have small rates of particulate matter emissions compared with diesel-powered vehicles. As discussed above, the proposed project would rezone sites and/or amend the General Plan to accommodate the construction of up to 2,314 additional dwelling units on the opportunity sites. As such, the proposed project would generate 10,506 average daily trips.



Energy source emissions result from activities in buildings for which natural gas is used. The quantity of emissions is the product of usage intensity (i.e., the amount of natural gas) and the emission factor of the fuel source.

Typically, area source emissions consist of emissions from the use of architectural coatings, consumer products, and landscaping equipment.

Long-term operation emissions associated with buildout of the 2,314 housing units was calculated using CalEEMod. The proposed project analysis was conducted using land use code *Apartments Mid Rise*. Although the specific design and configuration of future housing projects allowed under the proposed project cannot be known at this time as no plans have been submitted to the City, *Apartments Mid Rise* was determined to best represent the average building type anticipated under buildout of the proposed project over other CalEEMod land use codes such as “high rise” (more than 10 stories), “low rise” (1–2 stories), and “single family housing” based on the proposed densities and the anticipated mix of housing types, which are most likely to be in the 3–5 story range.

Trip generation rates used in CalEEMod for the proposed project were based on the project’s trip generation (as identified in Section 4.9, Transportation), which estimates that the proposed project would generate approximately 10,506 average daily trips. Information regarding specific development is not yet known; therefore, default assumptions (e.g., energy and water usage) from CalEEMod were used.

Model results are shown in Table 4.1.G below. CalEEMod output sheets are included in Appendix B of this EIR.

Table 4.1.G: Project Operational Emissions (in Pounds Per Day)

Source	Pollutant Emissions (lbs/day)					
	VOCs	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Project Mobile Sources	20.9	12.9	178.4	0.5	61.3	15.7
Project Area Sources	62.8	1.2	132.0	<0.1	<0.1	0.1
Project Energy Sources	0.4	6.4	2.8	<0.1	0.5	0.5
Total Project Emissions	84.1	20.5	313.2	0.5	61.8	16.3
SCAQMD Thresholds	55.0	55.0	550.0	150.0	150.0	55.0
Exceeds Thresholds?	Yes	No	No	No	No	No

Source: Compiled by LSA (August 2023).

CO = carbon monoxide

lbs/day = pounds per day

NO_x = nitrogen oxides

PM_{2.5} = particulate matter less than 2.5 microns in size

PM₁₀ = particulate matter less than 10 microns in size

SCAQMD = South Coast Air Quality Management District

SO_x = sulfur oxides

VOCs = volatile organic compounds

As shown in Table 4.1.G, project emissions would not exceed the significance criteria for NO_x, CO, SO_x, PM₁₀, or PM_{2.5} emissions; however, emissions of VOCs would exceed SCAQMD thresholds. Mitigation Measure AQ-1 would require the implementation of all feasible measures to reduce operational impacts associated with the proposed project, and Regulatory Compliance Measure AQ-5 would require all future projects comply with the latest Energy Code and Title 24 solar requirements for new residential development.



While Mitigation Measure AQ-1 and Regulatory Compliance Measure AQ-5 would significantly reduce criteria air pollutant emissions generated during operational activities associated with the proposed project, there is currently not enough information to quantify emissions of specific project development that may take place under the proposed project. Without quantification to guarantee a less than significant finding, future development projects may still exceed the SCAQMD regional significance thresholds. Therefore, operation of the proposed project would result in a significant impact related to a cumulatively considerable net increase of any criteria pollutant for which the Basin is in nonattainment under an applicable federal or State ambient air quality standard. Impacts would be significant and unavoidable.

Long-Term Microscale (CO Hot Spot) Analysis. Vehicular trips associated with the proposed project would contribute to congestion at intersections and along roadway segments in the City. Localized air quality impacts would occur when emissions from vehicular traffic increase as a result of the proposed project. The primary mobile-source pollutant of local concern is CO, a direct function of vehicle idling time and, thus, of traffic flow conditions. CO transport is extremely limited; under normal meteorological conditions, CO disperses rapidly with distance from the source. However, under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels, affecting local sensitive receptors (e.g., residents, schoolchildren, the elderly, and hospital patients). Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service or with extremely high traffic volumes. In areas with high ambient background CO concentrations, modeling is recommended to determine a project's effect on local CO levels.

An assessment of project-related impacts on localized ambient air quality requires that future ambient air quality levels be projected. Ambient CO levels monitored at the Anaheim monitoring station, the closest station to the City of Cypress, showed a highest recorded 1-hour concentration of 2.4 ppm (the State standard is 20 ppm) and a highest 8-hour concentration of 1.7 ppm (the State standard is 9 ppm) during the past 3 years (Table 4.1.D). The highest CO concentrations would normally occur during peak traffic hours; hence, CO impacts calculated under peak traffic conditions represent a worst-case analysis.

The proposed project would rezone sites and/or amend the General Plan to accommodate the construction of up to 2,314 additional dwelling units on the opportunity sites. The proposed project would generate 10,506 average daily trips in the immediate vicinity of the opportunity sites and would result in 856 a.m. peak-hour trips and in 902 p.m. peak-hour trips. However, as described in Section 4.9, Transportation, the proposed project would not result in any operational deficiencies to the surrounding roadway system. The evaluation of the study area intersections shows that the addition of traffic associated with new residential development allowed under the proposed project's rezoning action is not expected to create significant level of service changes under General Plan Build out conditions. Therefore, project traffic would not create any significant adverse impacts to nearby intersections.

Therefore, given the extremely low level of CO concentrations in the City, and lack of traffic impacts at any intersections, project-related vehicles are not expected to contribute significantly or result in the CO concentrations exceeding the State or federal CO standards. Impacts related to CO hot spots would be less than significant.



Threshold 4.1.3: Would the project expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. As discussed previously, the proposed project would not, in and of itself entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The proposed project would rezone sites and/or amend the General Plan to accommodate the construction of up to 2,314 additional dwelling units on the opportunity sites.

The SCAQMD recommends the evaluation of localized air quality impacts to sensitive receptors such as residential land uses in the immediate vicinity of the opportunity sites as a result of construction and operational activities. The thresholds are based on standards established by the SCAQMD in its Localized Significance Thresholds (LST) Methodology¹¹ and are measured against construction and operational emissions that occur on a specific project site. These emissions are primarily generated from heavy-duty construction equipment and demolition, grading, and trenching activities. However, the LSTs are applicable to projects at the project-specific level and are not applicable to programmatic documents, such as the proposed project. Construction and operational emissions associated with future individual projects developed under the proposed project, would however, have the potential to cause or contribute to significant localized air quality impacts to nearby residential land uses. Localized construction impacts of future residential development could potentially exceed the LSTs, particularly for construction of areas larger than 5 acres or areas with more intense construction activities. To address this, regulatory measures (e.g., SCAQMD Rule 201 for a permit to operate, Rule 403 for fugitive dust control, Rule 1113 for architectural coatings, Rule 1403 for new source review, and CARB's Airborne Toxic Control Measures) are currently in place, and mitigation would be imposed at the project level, which may include use of special equipment.

It should be noted that the amount of emissions from a project does not necessarily correspond to the concentrations of air pollutants. A dispersion modeling analysis would be necessary to calculate health risk from project implementation. However, since it is not possible to translate the amount of an unknown future specific project's emissions to a particular concentration, it is not possible to calculate the risk factor for a particular health effect at the time of this analysis.

Known health effects related to ozone include worsening of bronchitis, asthma, and emphysema and a decrease in lung function. Particulate matter can also lead to a variety of health effects in people. These include premature death of people with heart or lung disease, heart attacks, irregular heartbeat, decreased lung function, and increased respiratory symptoms. Regional emissions of criteria pollutants contribute to these known health effects. The SCAQMD is the primary agency responsible for ensuring the health and welfare of sensitive individuals and that they are not exposed to elevated concentrations of criteria pollutants in the Basin. To achieve the health-based standards established by the USEPA, the SCAQMD prepares an AQMP that details regional programs to attain the ambient air quality standards.

Although the analysis for the proposed project identifies that construction emissions associated with the project would not exceed the SCAQMD's thresholds for VOCs, NO_x, CO, SO_x, PM_{2.5}, or PM₁₀

¹¹ SCAQMD. 2021. Localized Significance Thresholds. Website: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds> (accessed June 2023).



emissions, it should be noted that not exceeding the SCAQMD's numeric regional mass daily thresholds does not necessarily correspond to less than significant health risk impacts to sensitive receptors. This is because the mass daily thresholds are in pounds per day emitted into the air, whereas health effects are determined based on the concentration of emissions in the air at a particular receptor (e.g., ppm by volume of air, or $\mu\text{g}/\text{m}^3$ of air). State and federal ambient air quality standards were developed to protect the most susceptible population groups from adverse health effects and were established in terms of parts per million or micrograms per cubic meter for the applicable emissions.

For this reason, the SCAQMD developed the LST Methodology. The LST methodology is based on the amount of emissions that could be generated from a project for a project to not cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standard, and are based on the ambient concentrations of the pollutant and the relative distance to the nearest sensitive receptor. However, as noted above, the LSTs are applicable to projects at the project-specific level and are not applicable to this programmatic planning level document. Localized construction impacts of future residential development projects could potentially exceed the LSTs, particularly for construction of areas larger than 5 acres or areas with more intense construction activities. Therefore, without mitigation, exceedances of the LSTs could have the potential to cause or exacerbate an exceedance of the CAAQS or NAAQS. It should be noted that the ambient air quality standards are developed and represent levels at which the most susceptible persons (children and the elderly) are protected. Therefore, the ambient air quality standards are purposefully set low to protect children, the elderly, and those with existing respiratory problems.

However, the SCAQMD acknowledges that they have only been able to correlate potential health outcomes for very large emissions sources; specifically, 6,620 pounds per day (lbs/day) of NO_x and 89,180 lbs/day of VOCs were expected to result in approximately 20 premature deaths per year and 89,947 school absences due to ozone.¹² As identified in Table 4.1.F above, based on the scale of development associated with the anticipated 2,314 dwelling units, construction of the proposed project would generate a maximum of 48.9 lbs/day of NO_x and 10.8 lbs/day of VOCs. Therefore, it is not expected that any future residential development associated with the proposed project would generate 6,620 lbs/day of NO_x or 89,180 lbs/day of VOC emissions.

Therefore, emissions associated with future projects are not sufficiently high enough to correlate health effects on a Basin-wide level.

Current scientific, technological, and modeling limitations prevent the relation of expected adverse air quality impacts to likely health consequences. For this reason, this discussion explains why it is not feasible to provide such an analysis. However, individual projects would still be required to conduct a site-specific localized impact analysis that evaluates potential project health impacts at a project level to immediately adjacent land uses.

The proposed project would rezone sites and/or amend the General Plan to accommodate the construction of up to 2,314 additional dwelling units on the opportunity sites. Localized construction

¹² Supreme Court of California. 2015. *Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno, Plaintiffs and Appellants, v. County of Fresno, Defendant and Despondent, and Friant Ranch, L.P., Real Part in Interest and Despondent*. April.



and operational impacts associated future housing development could potentially exceed the LSTs. However, as discussed above, all future discretionary projects would be reviewed in accordance with CEQA and would require further evaluation at the project level to demonstrate whether emissions would exceed SCAQMD's LSTs and require project-specific mitigation. In addition, RCM AQ-1 through RCM AQ-4 would be required for construction of future projects to ensure compliance with SCAQMD standard conditions, including Rule 403 (Fugitive Dust) to control fugitive dust and Rule 1113 (Architectural Coatings) to control VOC emissions from paint. Furthermore, any necessary mitigation would be imposed at the project level once such future projects are proposed.

Additionally, refer to the analysis provided under Threshold 4.1.2 for a discussion of potential construction and operational impacts relating to criteria air pollutants. With implementation of RCM AQ-1 through RCM AQ-4, the potential health impacts associated with the construction of the proposed project would be less than significant.

4.1.6 Level of Significance Prior to Mitigation

The proposed project would result in a potentially significant operational air quality impact. In addition, the following compliance measures are existing SCAQMD regulations that are applicable to the proposed project and are considered in the analysis of potential impacts related to air quality. These requirements are considered to be mandatory compliance measures; therefore, they are not mitigation measures.

4.1.7 Regulatory Compliance Measures and Mitigation Measures

4.1.7.1 Regulatory Compliance Measures

Regulatory Compliance Measure AQ-1

During clearing, grading, earth moving, or excavation operations, excessive fugitive dust emissions shall be controlled by regular watering or other dust preventative measures by using the following procedures, in compliance with South Coast Air Quality Management District (SCAQMD) Rule 403 during construction. The applicable Rule 403 measures are as follows:

- Apply nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).
- Water active sites at least twice daily (locations where grading is to occur shall be thoroughly watered prior to earthmoving).
- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 2 feet (0.6 meter) of freeboard (vertical space between the top of the load and the top of the trailer) in accordance



with the requirements of California Vehicle Code Section 23114.

- Pave construction access roads at least 100 feet (30 meters) onto the site from the main road.
- Reduce traffic speeds on all unpaved roads to 15 miles per hour or less.

Regulatory Compliance Measure AQ-2

All trucks that are to haul excavated or graded material shall comply with State Vehicle Code Section 23114, with special attention to Sections 23114(b)(F), (e)(2), and (e)(4) as amended, regarding the prevention of such material spilling onto public streets and roads.

Regulatory Compliance Measure AQ-3

Prior to approval of future project plans and specifications, the City of Cypress shall confirm that the construction bid packages specify:

- Contractors shall use high-volume low-pressure paint applicators with a minimum transfer efficiency of at least 50 percent;
- Coatings and solvents that will be utilized have a volatile organic compound content lower than required under SCAQMD Rule 1113; and
- To the extent feasible, construction/building materials shall be composed of pre-painted materials.

Regulatory Compliance Measure AQ-4

Future projects shall comply with SCAQMD Rule 402. Rule 402 prohibits the discharge of air contaminants or other material from any type of operations, which can cause nuisance or annoyance to any considerable number of people or to the public or which endangers the comfort or repose of any such persons, or the public.

Regulatory Compliance Measure AQ-5

All future projects shall comply with the latest Energy Code and Title 24 solar requirements for new residential development.



4.1.7.2 Mitigation Measures

Mitigation Measure AQ-1

Prior to issuance of building permits, the City of Cypress shall identify project design details and specifications, where feasible, to document implementation and compliance with the following emission reduction measures. Implementation of the following measures, where applicable, are considered to be applicable, feasible, and effective in reducing criteria pollutant emissions generated by the project:

- All Project Applicants shall incorporate design features (e.g., pollution prevention, pollution reduction, barriers, landscaping, ventilation systems, or other measures) at the proposed residential uses to minimize the potential impacts of air pollution on sensitive receptors.
- All Project Applicants shall incorporate fuel-efficient heating equipment and other appliances, such as water heaters, swimming pool heaters, cooking equipment, refrigerators, furnaces, boiler units, and low or zero-emitting architectural coatings. Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- All Project Applicants shall utilize energy-efficient design features, including appropriate site orientation, use of lighter color roofing and building materials, and use of deciduous shade trees and windbreak trees to reduce fuel consumption for heating and cooling.
- All Project Applicants shall provide Class I and Class II bicycle parking/storage facilities on site. Bicycle parking facilities should be near destination points and easy to find. At least one bicycle parking space for every 20 vehicle parking spaces should be provided.
- All Project Applicants shall provide building access and paths which are physically separated from street parking lot traffic and that eliminate physical barriers such as walls, berms, landscaping and slopes that impede the use of pedestrians, bicycle facilities, or public transportation vehicles.



- Where feasible, Project Applicants shall link culs-de-sac and dead-end streets to encourage pedestrian and bicycle travel.
- Where feasible, Project Applicants shall provide traffic reduction modifications to Project roads, such as: narrower streets, speed platforms, bulb-outs, and intersection modifications designed to reduce vehicle speeds and to encourage pedestrian and bicycle travel.
- All Project Applicants shall provide a display case or kiosk displaying transportation information in a prominent area accessible to employees, residents, or visitors.
- All Project Applicants shall display bike route maps, bus schedules, and any other transportation information such as carpooling and car sharing.
- All Project Applicants shall provide preferential parking spaces near the entrance of buildings for those who carpool/vanpool/rideshare and provide signage.
- Project Applicants shall install 240-volt electrical outlets or Level 3 chargers in parking lots that would enable charging of neighborhood electric vehicles (NEVs) and/or battery powered vehicles.
- Project Applicants shall maximize the planting of trees in landscaping and parking lots.
- Project Applicants shall use light-colored paving and roofing materials.

4.1.8 Level of Significance after Mitigation

Even with the implementation of Mitigation Measure AQ-1, operational air quality impacts would remain significant and unavoidable.

4.1.9 Cumulative Impacts

As defined in the *State CEQA Guidelines*, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for air quality. The cumulative impact area for air quality related to the proposed project is the South Coast Air Basin. Each project in the Basin is required to comply with SCAQMD rules and regulations and is subject to independent review.



The Basin is currently designated as a nonattainment area for the federal O₃ standard and PM_{2.5} standard and as a nonattainment area for the State O₃, PM₁₀, and PM_{2.5} standard. Thus, the Basin has not met the federal and State standards for these air pollutants. Future development that may take place with implementation of the project would contribute criteria pollutants to the area during project construction and operation.

Air pollution is inherently a cumulative type of impact measured across an air basin. The discussion under Threshold 4.1.2, above, includes an analysis of the proposed project's contribution to cumulative air impacts. As discussed above, construction emissions associated with the proposed project would not exceed the SCAQMD thresholds for VOCs, NO_x, CO, SO_x, PM_{2.5}, or PM₁₀ emissions. However, even with the with implementation of Mitigation Measure AQ-1, operational impacts from criteria pollutant emissions would exceed SCAQMD thresholds, which could hinder the attainment of air quality standards. Therefore, air quality emissions associated with future development that may occur under the proposed project could result in cumulatively considerable impacts, even with implementation of mitigation. Impacts would be significant and unavoidable.



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4.2 CULTURAL RESOURCES

This section provides a discussion of the existing cultural resource environment and an analysis of potential impacts from implementation of the 2021–2029 Cypress Housing Element Implementation project (proposed project). Cultural resources are sites, buildings, structures, objects, and districts over 50 years old that may have traditional or cultural value for the historical significance they possess. This section focuses on two particular sites within the boundaries of the proposed project’s opportunity sites, the Los Alamitos Race Course and the Lincoln Avenue Corridor, as sites where historically significant structures could potentially be located. This section summarizes the information obtained from conducting a Historic Resources Assessment and a Historic Resources Sensitivity Study for the Los Alamitos Race Course and the Lincoln Avenue Corridor, respectively. These studies are then used to inform the determination of whether impacts to historic resources under the proposed project would be significant.

The proposed project’s impacts on tribal cultural resources are evaluated separately and can be found in Section 4.10, Tribal Cultural Resources, of this Draft Program Environmental Impact Report (PEIR).

The Historic Resources Assessment and Historic Resources Sensitivity Study are included as Appendix C to this Draft PEIR.

4.2.1 Methodology

4.2.1.1 Los Alamitos Race Course

The proposed project would involve updates to the Cypress Town Center and Commons Specific Plan 2.0 (CTCC Specific Plan), ultimately reflecting new, denser residential zoning within the CTCC Specific Plan area to help meet the City’s Regional Housing Needs Assessment (RHNA) allocation of housing units. The CTCC Specific Plan area boundaries contain the Los Alamitos Race Course, for which a Historic Resources Assessment was conducted as part of the CEQA environmental review process. Two main components of this assessment were archival research and an intensive-level field study.

Race Course Archival Research. Archival research was conducted during the months of May, June, October, and November 2022. Research methods focused on the review of a variety of primary and secondary source materials relating to the history and development of the Los Alamitos Race Course property. Sources included, but were not limited to, information provided by and on file at the Los Alamitos Race Course, online sources, published literature in local and regional history, news articles, historic aerial photographs, and historic maps. Historical themes included horse racing, Quarter Horses, Frank Vessels, Sr., and pari-mutuel betting in California. A complete list of all references consulted in the preparation of the Historic Resources Assessment is provided in Appendix C.

Field Survey. On June 10, 2022, an LSA architectural historian and an LSA photographer conducted the intensive-level architectural survey of the Los Alamitos Race Course facility. The pair was escorted by the Los Alamitos Race Course Facilities Manager, who provided information about the buildings and features, as well as historical information about the facility. The trio began with the



clubhouse/grandstand building including, but not limited to, Burgart’s bar, the Cypress Room, Vessels Club restaurant, the Finish Line room, the betting area, box seating, and the jockey room. They then toured the barns and other features. During the survey, numerous photographs of the buildings and track and overview shots were taken. LSA’s architectural historian made notations regarding the structural and architectural characteristics and current conditions of the buildings and features. The architectural historian also made notes regarding the historical information provided by the Facilities Manager.

The field survey included numerous buildings, structures, and features, which are described below. Construction and alteration information that was gleaned about the buildings, structures, and features during the survey is included. The focus of the survey was the 0.25-mile track used for horse racing, which provides the main architectural and historical significance to the Los Alamitos Race Course.

California Department of Parks and Recreation (DPR) 523 Series Forms. In August of 2023, California Department of Parks and Recreation (DPR) 523 series forms were submitted on behalf of the Los Alamitos Race Course. DPR 523 series forms are used for recording and evaluating resources and for nominating properties to the California Register. The forms included a description of the Los Alamitos Race Course as well as an evaluation of its historical significance under State and federal criteria, which will be discussed further within Section 4.2.5, Project Impacts.

4.2.1.2 Lincoln Avenue Corridor

The proposed project would involve updates to the Lincoln Avenue Specific Plan, ultimately reflecting new, denser residential zoning within the Lincoln Avenue Specific Plan area to help meet the City’s RHNA allocation of housing units. A Historic Resources Sensitivity Study (Sensitivity Study) was prepared to identify potential historic-period resources. LSA conducted a limited amount of property-specific research, completed a cursory reconnaissance-level field survey of the buildings using Google Street View, and reviewed various databases to determine whether any of the historic-period properties have been previously evaluated.

A total of 117 properties within the Lincoln Avenue Specific Plan Area were identified as opportunity sites with the potential to be directly impacted by future development (Potential Impact Areas). Using a worst-case approach, 143 adjacent properties were recognized as potentially impacted properties based on their proximity to the opportunity sites within the Lincoln Avenue Specific Plan Area. Therefore, a total of 260 properties were considered for the Sensitivity Study.

Research. In order to identify potential impacts related to historic-period resources, LSA identified properties that may be directly and indirectly impacted by new development on the opportunity sites. Historic-period resources are those elements of the built environment that are 50 years of age or older (i.e., built prior to 1973). However, in order to extend the reach of the study through the end of the new Housing Element, historic-period resources were defined as those built prior to 1980 (i.e., those that will be 50 years of age in 2029).

Using Orange County parcel data, a spreadsheet was created listing all of the Lincoln Avenue opportunity sites and the Potential Impact Areas, along with their dates of construction (if included



in the County data). Using historic aerial photographs, real estate websites, and Google Earth Street View, dates of construction for each of the 260 properties were verified, revised, or approximated. As a result of these efforts, 186 properties were identified as having buildings that were constructed prior to 1980. Eighty-two (82) of the opportunity sites are developed with historic-period buildings, while 104 of the Potential Impact Areas have historic-period buildings. Currently, there are 50 opportunity sites that are vacant land or have no structures (13) or that have not yet reached the 50-year age threshold (37), making them historically insignificant.

This was followed by reviews of the National Register of Historic Places (National Register; current through 2020), the National Register weekly lists (through July 15, 2022), and the California Office of Historic Preservation's (OHP) Built Environment Resources Database (BERD, March 2020)¹ to determine whether any of the historic-period buildings in the Historic Resource Impact Area were included in any of those databases. This research found only one property in the Historic Resource Impact Area that has been previously evaluated: 5162 Alaska Avenue (Assessor's Parcel Number [APN] 262-361-40). This property, which is within a Potential Impact Area, was deemed ineligible for listing in the National Register in 2010. It was not evaluated for listing in the California Register of Historical Resources (California Register) or for local designation.

Virtual Field Survey. Following the research stage, a virtual reconnaissance-level field survey was conducted using Google Street View. The Google Street View photographs were taken from 2020 to 2022. The reasons for conducting this survey were to: verify the type of development on each property; confirm the general dates of construction; and identify any historic-period properties in the Historic Resource Impact Area that appear potentially significant for their architecture, as a property type, or for an association with an important event or pattern of development.

Based on the results of the virtual field survey conducted above, certain properties were identified to have a greater potential for historical significance than other historic-period resources in the Historic Resource Impact Area. Most of the properties have sustained alterations and, therefore, are not likely to be significant as exceptional examples of architectural styles, but they may represent an important property type or contribute to an important pattern of development. Resources associated with patterns of development would most likely be part of a collection of similar, geographically linked resources that would form a historic district. Examples might be a collection of commercial resources that illustrate the importance of Lincoln Avenue as a commercial corridor during a specific period in history or a group of residences that exemplify the characteristics of residential development during a particular time-period (e.g., post-World War II residential development).

4.2.2 Existing Environmental Setting

4.2.2.1 Pre-Settlement

The area that is now Cypress (including all opportunity sites analyzed under the proposed project) was prehistorically occupied by the Gabrielino Native American people.

¹ California Office of Historic Preservation (OHP). 2020. Built Environment Resources Database (BERD). March 2020.



4.2.2.2 Settlement and Development

The historic period in California is divided into three periods: Spanish/Mission Period (1769–1821), Mexican/Rancho Period (1821–1848), and the American Period (1848–Present). Spanish exploration of southern California began in the late 1700s as expeditions began seeking routes from San Diego to the Los Angeles basin and further regions of “Alta California.” One of the logical, geographic passages between the Pacific Coast and the Los Angeles Basin was what is now known as Santa Ana Canyon. Some of the more notable and documented explorers to use this route, which went through what would become Orange County, were Don Gaspar Portolá, Juan Bautista de Anza, and Don Pedro Fages. In 1784, General Pedro Fages received a petition from three of his soldiers who wanted land to build homes and graze the cattle they had acquired.² Fages agreed and that same year (1784) Manuel Perez Nieto was granted 300,000 acres, which became known as Los Nietos and included the area that would become Cypress.³ After Manuel’s death in 1804, the land was divided among his four surviving children and Juan Jose Nieto received the acres called Los Alamitos (approximately 28,000 acres) and Los Coyotes (approximately 49,000 acres), which include Cypress.⁴ In 1806, Nieto built an adobe house in the southwest corner of Rancho Los Alamitos.⁵

In 1821, Mexico won independence from Spain and took over Alta California. In 1834, Juan Jose Nieto was formally granted Los Alamitos by Governor Juan Figueroa and a few months later sold it to the governor for just \$500.⁶ Figueroa later sold it to Abel Stearns in 1842.⁷ Eventually Stearns owned both ranchos (Los Alamitos and Los Coyotes) and “built up the largest land and cattle empire in the area”.⁸

In 1848, Alta California came under control of the United States, and in 1850, it was admitted to the Union. In 1861, Stearns borrowed on the Rancho from money lender Michael Reese to finance a business venture in Los Angeles.⁹ By 1865, Stearns was in jeopardy of losing his land to Reese so a group of his friends formed the Robinson Trust to save him from bankruptcy.¹⁰ In 1866, Reese foreclosed on a portion of the Rancho and began leasing it to the Bixbys, who were sheep farmers from Maine.¹¹ Meanwhile, in 1868, the Trust began to sell 120- to 160-acre tracts and by the time Stearns died in 1871, he was on his way to another fortune.¹²

² Carpenter, Virginia. 2003. *Ranchos of Orange County: Chronologies of Early California*. Produced in cooperation with Jane Mueller. California: The Paragon Agency Publishers.

³ Ibid.

⁴ Ibid.

⁵ Ibid.

⁶ Ibid.

⁷ Ibid.

⁸ Wheeler, Eileen, and Dr. Warren Beck. *City of Cypress History*. News-Enterprise Archives. Website: <http://www.cypressca.org/home/showdocument?id=6> (accessed January 10, 2023).

⁹ Carpenter, Virginia. 2003. *Ranchos of Orange County: Chronologies of Early California*. Produced in cooperation with Jane Mueller. California: The Paragon Agency Publishers.

¹⁰ Ibid.

¹¹ Ibid.

¹² Ibid.



The 1880s was a boom period in southern California that helped complete “the transition from range land to agricultural economy”.¹³ Between 1866 and 1884 the population of Los Angeles increased from approximately 12,000 to around 100,000 and other cities also were expanding rapidly.¹⁴ Orange County was formed in 1889, putting half of Rancho Los Alamitos in Los Angeles County and half in Orange County.¹⁵ In 1881, John and Jotham Bixby and Isaac Hellman (a banker) bought Rancho Los Alamitos and joined it to Los Cerritos.¹⁶ They formed the Alamitos Land Company to subdivide part of the Rancho into farm lands.¹⁷ This represents the beginnings of what would become Cypress.

By the late 1880s, white and sweet potatoes, as well as sugar beets were the main crops.¹⁸ However, dairy farming, which was supported by the beet farming, was a major industry with nearby Buena Park at its center.¹⁹ In the Cypress area almost everyone had cows, but sorghum was what the area was really known for.²⁰ In 1889, the McWilliams family moved to the area, planted sorghum, and established a makeshift processing plant for it.²¹ In its first year, it processed 100 gallons of syrup.²² Soon other farmers planted sorghum and the industry steadily expanded.²³ In 1907, a regular mill was built that processed 15,000 gallons of syrup its first year.²⁴

As more people moved into the area, the demand grew for schools. In the early 1890s, there were two schools, Centralia and Bloomfield.²⁵ In 1895, the Cypress School District was formed and a building was constructed on an acre of land donated by Charles Lee Damron.²⁶ The new school was named Cypress School because of the cypress trees planted around the school yard as a windbreak. For many years, it was the only school in the district.²⁷ “In 1906, Pacific Electric built a line to the area to connect Los Angeles to Santa Ana” and development began to cluster around the rail station “at what is now the intersection of Lincoln Avenue and Walker Street” within the Lincoln Avenue Specific Plan area.²⁸ At that time, the community was nicknamed Waterville due to the

¹³ Wheeler, Eileen, and Dr. Warren Beck. *City of Cypress History*. News-Enterprise Archives. Website: <http://www.cypressca.org/home/showdocument?id=6> (accessed January 10, 2023).

¹⁴ Ibid.

¹⁵ Carpenter, Virginia. 2003. *Ranchos of Orange County: Chronologies of Early California*. Produced in cooperation with Jane Mueller. California: The Paragon Agency Publishers.

¹⁶ Ibid.

¹⁷ Ibid.

¹⁸ Wheeler, Eileen, and Dr. Warren Beck. *City of Cypress History*. News-Enterprise Archives. Website: <http://www.cypressca.org/home/showdocument?id=6> (accessed January 10, 2023).

¹⁹ Ibid.

²⁰ Ibid.

²¹ Ibid.

²² Ibid.

²³ Ibid.

²⁴ Ibid.

²⁵ Ibid.

²⁶ Ibid.

²⁷ Epting, Charles. 2014. *The New Deal in Orange County California*. South Carolina: The History Press.

²⁸ Wheeler, Eileen, and Dr. Warren Beck. *City of Cypress History*. News-Enterprise Archives. Website: <http://www.cypressca.org/home/showdocument?id=6> (accessed January 10, 2023).



preponderance of artesian wells in the area, but the train station was named Cypress reportedly to be consistent with the school.²⁹ In 1924, the school was replaced with a larger building that became the center of the community’s social life.³⁰

During the Depression era, the area was hard hit by the 1933 Long Beach earthquake, which damaged Cypress School, and the 1938 flood, which left most of Waterville under two to three feet of water.³¹ The school was rebuilt in 1936 using Public Works Administration (PWA) funds and was still the only school in the Cypress School District.³² Although rural communities like Waterville suffered less from the Depression, people still struggled. The needy were assisted by a variety of federal relief programs and many school children received free hot lunches.³³

“In 1910, a local farmer named George Miller formed the Southern California Dairy Association, and by the 1940s, dairies emerged as the community’s leading industry”.³⁴ However, the World War II years brought many changes to the area as several military facilities moved nearby. These included the United States Naval Station in Los Alamitos (next to Cypress), the Seal Beach Ammunition Depot, the United States Naval Air Station in Santa Ana, the Santa Ana Army Air Base, and Irvine Park which was used as an Army training camp.³⁵ Aircraft plants and ship yards created jobs in nearby communities such as Long Beach and Santa Monica. The combination of new employment opportunities and men joining the armed services created a shortage of labor in the fields.³⁶ To alleviate the shortage, workers from Mexico were brought in through treaty arrangements and later German prisoners of war were used to harvest crops.³⁷

After the war, returning GIs created such a big demand for housing in surrounding areas that many farmers relocated to Waterville.³⁸ By the late 1940s, Waterville was the third largest dairy district in the country.³⁹ When it incorporated in 1956, it took the name Dairy City.⁴⁰ In the 1950s, Dairy City (now Cypress), Dairyland (now La Palma), and Dairy Valley (now Cerritos) were collectively known as

²⁹ Carpenter, Virginia. 2003. *Ranchos of Orange County: Chronologies of Early California*. Produced in cooperation with Jane Mueller. California: The Paragon Agency Publishers.

³⁰ Ibid.

³¹ Wheeler, Eileen, and Dr. Warren Beck. *City of Cypress History*. News-Enterprise Archives. Website: <http://www.cypressca.org/home/showdocument?id=6> (accessed January 10, 2023).

³² Epting, Charles. 2014. *The New Deal in Orange County California*. South Carolina: The History Press.

³³ Wheeler, Eileen, and Dr. Warren Beck. *City of Cypress History*. News-Enterprise Archives. Website: <http://www.cypressca.org/home/showdocument?id=6> (accessed January 10, 2023).

³⁴ Ibid.

³⁵ Ibid.

³⁶ Ibid.

³⁷ Ibid.

³⁸ Ibid.

³⁹ Ibid.

⁴⁰ Epting, Charles. 2014. *The New Deal in Orange County California*. South Carolina: The History Press.



“Moo-Valley”.⁴¹ In 1957, the city’s name was changed to Cypress.⁴² In the 1960s, skyrocketing real estate prices in Moo Valley resulted in an exodus of dairy farmers to Riverside County.⁴³

4.2.2.3 Los Alamitos Race Course

In 1947, Frank Vessels, Sr., built a race track on his 435-acre ranch and stallion farm in present-day Cypress.⁴⁴ It was initially used for training and match racing the Quarter Horses (QH) he bred there, but by the Spring, Vessels’ new race track “located two miles west of Stanton on Katella Road near the Los Alamitos Air Station” began to host motorcycle races sanctioned by the American Motorcycle Association.⁴⁵ In August 1947, a crowd variously estimated at between one and two thousand showed up to watch the first full card of QH racing, six non-pari-mutuel races (fans could not bet on the horses). Soon the QH races became a weekly event.⁴⁶ At that time, the track was located a little southwest of where it is today in an area between Vessels’ home and the railroad tracks. The area is now developed with Ovation at Flora Park, a 55+ residential community.

Attendance at the QH races was so high that Vessels had to scale back the races to once a month. During this time, it was only legal to bet on thoroughbred (TB) horse races and standardbreds (trotters), because the sport generated State tax revenues, which were used, among other things, to improve the breeds. In 1948, the State Attorney General ruled that Quarter Horse racing was legal based on current law, because by then registered Quarter Horses were a recognized breed. Despite this ruling, the California Horse Racing Board (CHRB), which was controlled by the breeders of thoroughbreds, refused to allow betting on QH races.⁴⁷ This prompted the QH breeders to organize. Vessels founded and became president of the Pacific Coast Quarter Horse Association, an affiliate of the national association, and began lobbying Sacramento for pari-mutuel wagering on Quarter Horses.⁴⁸ The State Legislature passed a bill allowing the State’s six major tracks to include one Quarter Horse race per day. Bay Meadows at San Mateo was the first, carding 25 sprints.⁴⁹ Finally, the CHRB agreed to pari-mutuel betting on QH races. This had a profound impact on the sport of horse racing and the industry of horse breeding in California.

In December 1951, the first pari-mutuel all-Quarter Horse meet was held at Vessels’ track, with more than 400 sprinters from various states and over 4,100 spectators the first day.⁵⁰ On closing

⁴¹ Wheeler, Eileen, and Dr. Warren Beck. *City of Cypress History*. News-Enterprise Archives. Website: <http://www.cypressca.org/home/showdocument?id=6> (accessed January 10, 2023).

⁴² Ibid.

⁴³ Whiting, David. 2015. *Cypress Evolves from Cow Town to Community Town*. The Orange County Register. Website: <https://www.ocregister.com/2015/08/04/whiting-cypress-evolves-from-cow-town-to-community-town/> (accessed January 10, 2024).

⁴⁴ Long Beach Press-Telegram. 1947. *Cycle Club Bills Races on New Vessels Track*. page 16.

⁴⁵ Ibid.

⁴⁶ Chamberlain, Richard. 2000. *Los Alamitos Race Course 50 Years of Racing 1951-2000*. Brochure provided by Facilities Manager, Frank Sherran, June 2022.

⁴⁷ Ibid.

⁴⁸ Ibid.

⁴⁹ Ibid.

⁵⁰ Ibid.



day, more than 7,000 fans showed up, indicating that Quarter Horse racing would maintain its popularity.⁵¹ In 1952, *Monita* and *Black Easter Bunny* won “divisions of the first Los Alamitos Invitational Championship, then called the California Championship”.⁵²

By 1953, a new track was under construction northwest of the original track (Historicaerials.com var.⁵³). The new track (in the current location) opened in 1954 in time for the Fall meet and soon became the “premier Quarter Horse track in the country”.⁵⁴ By 1959, Los Alamitos Race Course was the second largest revenue generator in the City of Cypress. Frank Vessels, Sr., was inducted into the American Quarter Horse Association Hall of Fame (1989). Los Alamitos Race Course is the premiere Quarter Horse (QH) race track in California, hosting the Champion of Champion stakes race since 1972 (\$750,000 purse, 440 yards distance.) The golden age of horse racing came to an end around 1970, when attendance declined due to off track betting (OTB) and competition from other forms of entertainment. The track stayed in the Vessels family until 1984, when it was sold to Hollywood Park.⁵⁵ By 1989, it was under a new ownership group, including Edward Allred, that soon began a series of renovations to the buildings and the track’s interior.⁵⁶ Although Los Alamitos Race Course has sustained alterations to most, if not all, of its buildings and features, including the oval, it retains enough integrity to convey an association with the historic period. All major features remain including the grandstand, barns, clubhouse, and, of course, the race track itself. The period of significance for Los Alamitos Race Course is 1954, when the track was built at the current location, to 1970, which is the end of the golden age of horse racing.

4.2.2.4 Lincoln Avenue

Lincoln Avenue runs east to west across Cypress and is the City’s major commercial corridor. Rather than characteristic groupings of activity along Lincoln Avenue, the corridor contains a dispersion of low intensity commercial uses. Current land uses include commercial retail, service oriented, office, and residential uses.⁵⁷ In order to rectify Lincoln Avenue’s fragmented land use pattern, the City adopted a Redevelopment Plan in 1990 that was intended to enhance the visual character and economic vitality of the Lincoln Avenue area. A Specific Plan was enacted in 1993, which heavily valued citizen input. In order to enhance the attractiveness of the corridor, structures located along Lincoln Avenue are subject to strict development guidelines as laid out in the Specific Plan.

⁵¹ Chamberlain, Richard. 2000. *Los Alamitos Race Course 50 Years of Racing 1951-2000*. Brochure provided by Facilities Manager, Frank Sherran, June 2022.

⁵² Ibid.

⁵³ Historicaerials.com. var. Historic aerial photographs of the Los Alamitos Race Course property. Website: <https://www.historicaerials.com/viewer> (accessed January 10, 2024).

⁵⁴ Chamberlain, Richard. 2000. *Los Alamitos Race Course 50 Years of Racing 1951-2000*. Brochure provided by Facilities Manager, Frank Sherran, June 2022.

⁵⁵ Ibid.

⁵⁶ Los Angeles Times. 1991. Los Alamitos: Track Celebrates 40th Anniversary. Website: <https://www.latimes.com/archives/la-xpm-1991-12-04-sp-244-story.html> (accessed November 2022).

⁵⁷ City of Cypress. 1998. Lincoln Avenue Specific Plan. Website: <https://www.cypressca.org/home/showpublisheddocument/9679/637363678383730000> (accessed May 2023).



Most of the properties along the Lincoln Avenue corridor have sustained alterations and are therefore unlikely to be significant as exceptional examples of architectural styles. However, they may represent an important property type or contribute to an important pattern of development. Resources associated with patterns of development would most likely be part of a collection of similar, geographically linked resources that would form a historic district. Examples might be a collection of commercial resources that illustrate the importance of Lincoln Avenue as a commercial corridor during a specific period in history or a group of residences that exemplify the characteristics of residential development during a particular time-period. As described earlier in this section, the post- World War II era would be an example of a period of rapid residential development in the City.

4.2.3 Regulatory Setting

4.2.3.1 Federal Regulations

The National Historic Preservation Act of 1966 (NHPA). The NHPA requires that the federal government list significant historic resources on the National Register of Historic Places (National Register). Federal agencies must consult the National Register when planning to undertake or grant approval through permits for a project. Prior to the issuance of any license or implementation of any project, the federal agency must consider the effects of a project or license on any historical buildings, sites, structures, or objects that are included on, or eligible for inclusion on, the National Register (16 United States Code [USC] Section 470(f)). This typically includes consultation with the federal agency responsible for the undertaking; the State Historic Preservation Officer (SHPO); local Native American groups and individuals; local and State historical societies and organizations; and relevant archival sources, including the appropriate facility of the California Historical Resources Information System (CHRIS). A cultural resource is evaluated for eligibility for listing in the National Register according to four criteria. These criteria generally require that the resource be 50 years of age or older and significant at the local, State, or national level according to one or more of the following:

- A. It is associated with events that have made a significant contribution to the broad patterns of our history;
- B. It is associated with the lives of persons significant in our past;
- C. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values, or that represent a significant and distinguishable entity whose components lack individual distinction; and/or
- D. It has yielded, or may be likely to yield, information important to prehistory or history.

Properties that are not 50 years of age or older must have “exceptional significance” in accordance with National Register Criteria Considerations. The National Register also requires that a resource possess integrity, which is defined as “the ability of a property to convey its significance.” The aspects of integrity are location, design, setting, materials, workmanship, feeling, and association. To determine which of these factors are most important will depend on the particular National Register criterion under which the resource is considered eligible for listing.



The Native American Graves Protection and Repatriation Act (NAGPRA). The NAGPRA (Public Law 101-601; 25 USC 3001-3013) describes the rights of Native American lineal descendants, Indian tribes, and Native Hawaiian organizations with respect to the treatment, repatriation, and disposition of Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony, referred to collectively in the statute as cultural items, with which they can show a relationship of lineal descent or cultural affiliation. It requires that federal agencies and museums receiving federal funds inventory holdings of Native American human remains and funerary objects and provide written summaries of other cultural items.⁵⁸

4.2.3.2 State Regulations

California Health and Safety Code (HSC) Section 7050.5. California HSC Section 7050.5 states that, in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the Coroner of the county in which the remains are discovered has determined whether or not the remains are subject to the Coroner's authority. If the human remains are of Native American origin, the Coroner must notify the Native American Heritage Commission (NAHC) within 24 hours of this identification. The NAHC will identify a Native American Most Likely Descendant (MLD) to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods.

Public Resources Code Section 5097.5. PRC Section 5097.5 provides for the protection of cultural resources and prohibits the removal, destruction, injury, or defacement of archaeological features on any lands under the jurisdiction of State or local authorities.

California Register of Historical Resources (PRC Section 5020 et seq.). State law also protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources in CEQA documents. A cultural resource is an important historical resource if it meets any of the criteria found in *State CEQA Guidelines* Section 15064.5(a). These criteria are nearly identical to those for the National Register, which are listed above under Section 4.2.3.1, Federal Regulations.

The SHPO maintains the California Register. Properties listed, or formally designated eligible for listing, on the National Register are nominated to the California Register and then selected to be listed on the California Register, as are State Landmarks and Points of Interest.

The California Register criteria are based on National Register criteria. For a property to be eligible for inclusion in the California Register, one or more of the following criteria must be met:

1. It is associated with the events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;
2. It is associated with the lives of persons important to local, California, or national history;

⁵⁸ National Park Service (NPS). The Native American Graves Protection and Repatriation Act (NAGPRA). Website: <https://www.nps.gov/archeology/tools/laws/nagpra.htm> (accessed January 10, 2024).



3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values; and/or
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

In addition to meeting one or more of the above criteria, the California Register requires that sufficient time has passed since a resource's period of significance to "obtain a scholarly perspective on the events or individuals associated with the resource." Fifty years is used as a general estimate of time needed to develop the perspective to understand the resource's significance (California Code of Regulations [CCR] 4852[d][2]).

The California Register also requires that a resource possess integrity, which is defined as "the authenticity of an historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance" (California Office of Historic Preservation [OHP] 1999:2)⁵⁹. To retain integrity, a resource should have its original location, design, setting, materials, workmanship, feeling, and association. Which of these factors is most important depends on the particular criterion under which the resource is considered eligible for listing.⁶⁰

4.2.3.3 Regional Regulations

There are no regional regulations that are applicable to cultural resources relevant to the proposed project.

4.2.3.4 Local Regulations

Cypress General Plan. The Conservation/Open Space/Recreation (COSR) Element of the Cypress General Plan identifies goals and policies related to cultural resources (and includes references to paleontological resources). Goal COSR-5 is to "preserve Cypress' archaeologic and palaeontologic resources".⁶¹ COSR-5.1 and COSR-5.2 were identified as policies in order to achieve Goal COSR-5. Policy COSR-5.1 is "to update records of resource finds and locations when required"⁶² and COSR-5.2 states that "[p]rior to development in previously undeveloped areas, [the City will] require strict adherence to the CEQA guidelines for environmental documentation and mitigation measures where development will affect archaeological or paleontological resources."⁶³

However, the City's General Plan does not identify any historic resources and does not contain any specific policies to protect historic resources. In fact, the City's General Plan states that a record search was conducted by the Regional Information Center at UCLA on November 1, 1991, and

⁵⁹ California Office of Historic Preservation (OHP). 1999. California Register and National Register: A Comparison (for purposes of determining eligibility for the California Register), OHP Technical Assistance Series #6.

⁶⁰ Ibid.

⁶¹ City of Cypress. 2001. Conservation/Open Space/Recreation Element. Website: <https://www.cypress.ca.org/home/showpublisheddocument/686/636123123792970000> (accessed January 10, 2024).

⁶² Ibid.

⁶³ Ibid.



yielded negative results for any recorded prehistoric or historic sites. This search also involved a review of maps from the years 1896–1942, which showed a high volume of development between 1942 and 1996. The City contains no National Register listed or eligible properties, or any State Landmarks.

4.2.4 Thresholds of Significance

The thresholds for cultural resources impacts used in this analysis are consistent with Appendix G of the *State CEQA Guidelines* and the City's *Initial Study/Environmental Checklist*. The proposed project may be deemed to have a significant impact with respect to cultural resources if it would:

- Threshold 4.2.1:** Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?
- Threshold 4.2.2:** Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?
- Threshold 4.2.3:** Disturb any human remains, including those interred outside of dedicated cemeteries?

As discussed in Section 4.5 of the Initial Study prepared for the proposed project (Appendix A), the proposed project would result in less than significant impacts to archaeological resources (Threshold 4.2.2) and human remains (Threshold 4.2.3) with the incorporation of Regulatory Compliance Measures (RCM) CUL-1 and RCM CUL-2, respectively. Therefore, these topics are not further addressed below.

4.2.5 Project Impacts

- Threshold 4.2.1:** **Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?**

Less Than Significant Impact. Several of the opportunity sites for residential development identified in the City of Cypress' General Plan 2021–2029 Housing Element overlap with the Los Alamitos Race Course, the essential features of which qualify as a historical resource for the purposes of CEQA, as discussed in detail below. Additionally, several of the opportunity sites contain structures along Lincoln Avenue that are of historic age or could be of historic age upon redevelopment.

Los Alamitos Race Course. The approximately 125-acre Los Alamitos Race Course (LARC) property is located within the CTCC Specific Plan, which would be rezoned under the proposed project in order to accommodate additional residential development consistent with the City's RHNA allocation as described in the updated 2021–2029 Housing Element.

For the purposes of this assessment, the area considered to be part of LARC includes the track itself (including the 1954 quarter-mile chute, the pre-1970 smaller track, and the post-1970 expanded track), grandstands, barns/stables, offices, parking lots, and other built environment features associated with the course. To determine the potential effects of the project on historic resources, a Historic Resources Assessment (HRA) was prepared in October 2023. The HRA included archival research, an intensive-level field survey, and an evaluation of the LARC under the criteria for listing



in the National Register of Historic Places (National Register) and California Register of Historical Resources (California Register). Upon these evaluations, the LARC was determined to be eligible for both the National Register and the California Register. These eligibilities stem from the LARC's association with the establishment and success of organized Quarter House racing in California (National Register Criterion A/California Register Criterion 1) and with Frank Vessels, Sr., who had a profound impact on quarter horse racing and breeding in California (National Register Criterion B and California Register Criterion 2). California Department of Parks and Recreation (DPR) 523 series forms recording and evaluating the site as a historic resource were prepared and are attached as an appendix to the HRA (Appendix C of this PEIR).

Based on the Historic Resources Assessment's findings, the essential features of Los Alamitos Race Course are considered a "historical resource" for the purposes of CEQA. The HRA identified those features as (1) the grandstand, (2) the 1954 quarter-mile chute and (3) the pre-1970 track. Based on the boundaries of the opportunity sites within the CTCC Specific Plan area (see Figure 3-3, Opportunity Sites, as provided in Chapter 3.0, Project Description), several areas bordering and overlapping with those essential features (see Figure 3-4, Cypress Town Center and Commons Specific Plan 2.0 Planned Land Uses, also in Chapter 3.0) would allow for increased residential densities. These parcels' close proximity and/or overlap with the essential features of Los Alamitos Race Course would potentially adversely affect them with the implementation of the proposed project.

This PEIR evaluates a programmatic update to the City's General Plan, the Lincoln Avenue Specific Plan, the CTCC Specific Plan, the CBPC Specific Plan, and Zoning Ordinance that represents a policy action and does not propose any physical development at this time. Further, the specific location and configuration of future development within the LARC opportunity sites has not yet been determined and is not under consideration as part of this programmatic update. As such, the proposed project would have less than significant impacts to the LARC as a historical resource.

Lincoln Avenue. Lincoln Avenue is of particular interest due to the presence of historic-age structures (built in 1980 or earlier; 50 years of age as of 2029) along the corridor. Lincoln Avenue is located within the Lincoln Avenue Specific Plan, which would be rezoned under the proposed project in order to accommodate residential development consistent with the City's RHNA allocation as described in the updated 2021–2029 Housing Element.

To determine the potential effects of the project on historic resources, a Sensitivity Study was prepared on November 22, 2022. As noted in the Sensitivity Study, 117 properties were designated as potentially directly impacted as they are located on an opportunity site and 143 properties were designated as potentially indirectly impacted as they are located within close proximity to an opportunity site.

Reviews of the National Register of Historic Places (National Register; current through 2020), the National Register weekly lists (through July 15, 2022), and the California Office of Historic



Preservation’s (OHP) Built Environment Resources Database⁶⁴ found that none of the properties were listed or eligible for listing in the databases. A structure at 5162 Alaska Avenue, a potentially indirectly affected site, was evaluated and found ineligible for listing in the California Register or for local designation.

The virtual field survey identified certain structures with greater potential for historical significance than others based on factors such as property type, architecture, and grouping. Properties listed in Tables 4.2.A and 4.2.B have been identified as properties that appear to have a greater potential for historical significance than other historic-period resources in the Historic Resource Impact Area.

Table 4.2.A: Opportunity Sites – Potentially Significant

APN	Address	Year Built	Property	Potential Significance
244-361-04	4656 Lincoln Avenue	1952	Hyatt Die Cast (COM)	Post-WWII commercial development; association with local economy
244-051-09	4872 Lincoln Avenue	1929	SFR	Inter-war pattern of development
244-071-09	5200 Lincoln Avenue	1936	Calvary Old Path Church	Architecture
244-461-06	5302 Lincoln Avenue	1924	American Rental (SFR converted to COM)	Inter-war pattern of development; architecture
244-461-07	5312 Lincoln Avenue	1926	J.D. Coulter Company (SFR converted to COM)	Inter-war pattern of development
244-461-09	5332 Lincoln Avenue	1923	SFR	Inter-war pattern of development.
244-461-10	5342 Lincoln Avenue	1952	Made in the Shade (COM)	Post-WWII pattern of development
262-424-10	5381 Lincoln Avenue	1970	Sound Avenue and sign (COM)	Post-WWII pattern of development
262-424-11	5391 Lincoln Avenue	1965	Lincoln Animal Hospital (COM)	Post-WWII commercial development
244-471-06	5500 Lincoln Avenue	1968	Juanito’s Mexican Food (COM)	Post-WWII commercial development; property type
262-472-33	5591 Lincoln Avenue	1968	Dalton’s Café (COM)	Post-WWII commercial development
262-472-35	5641 Lincoln Avenue	1971	Family Dentist (COM)	Architecture
262-472-37	5661 Lincoln Avenue	1948	Driving School (COM)	Post-WWII pattern of development
244-472-05	5662 Lincoln Avenue	1961	Peacock Motel and sign	Tourism; property type
244-472-06	5682 Lincoln Avenue	1963	Cloud 99 motel and sign	Tourism; property type
134-011-55	6046 Lincoln Avenue	1961	Paw House Pet Grooming and sign (COM)	Post-WWII commercial development
262-473-02	8972 Walker Street	1928	COM	Inter-war pattern of development

Source = Compiled by LSA (2023).
APN = Assessor’s Parcel Number
COM = Commercial
SFR = Single-family residential

⁶⁴ California Office of Historic Preservation (OHP). 2020. Built Environment Resources Database (BERD). March 2020.



Table 4.2.B: Potential Impact Areas - Potentially Significant

APN	Address	Year Built	Property	Potential Significance
262-361-39	5172 Alaska Avenue	1960	SFR	Post-WWII residential development
244-042-21	9302 Alderbury Street	1965	SFR	Post-WWII residential development
244-461-17	5301 Bishop Street	1927	SFR	Architecture
244-461-16	5311 Bishop Street	1927	SFR/MFR	Architecture
244-061-22 through 244-061-25 and 244-061-55 through 244-061-59	9141-9221 Julie Beth Street	1965–1966	SFR	Post-WWII residential development
244-481-01	5762 Lincoln Avenue	1971	Post Office	Architecture
244-042-15 through 244-042-020	4681-4751 Newman Avenue	1965	SFR	Post-WWII residential development
244-361-08 through 244-361-021	9100-9230 Whitney Way	1968	SFR	Post-WWII residential development

Source = Compiled by LSA (2023).
APN = Assessor’s Parcel Number
MFR = Multi-family residential
SFR = Single-family residential

Typically, historic-period resources are those elements of the built environment that are 50 years of age or older (i.e., built prior to 1973). However, in order to extend the life of the historic resources analysis, historic-period resources have been defined for the proposed project as those built prior to 1980 (i.e., those that will be 50 years of age in 2029). Ultimately, findings from the research and virtual field survey reveal that a total of 186 properties in the Historic Resource Impact Area that are currently developed with historic-period (pre-1980) buildings. Further, some of the residences included in the Historic Resource Impact Area may contribute to important patterns of residential development. Therefore, the sensitivity for historic resources along Lincoln Avenue was categorized as high in the Sensitivity Study.

Under the proposed project, several opportunity sites along the Lincoln Avenue Corridor would be rezoned for residential use, allowing for up to 30 dwelling units per acre. Therefore, it is reasonable to assume that some existing structures would be demolished or repurposed in order to construct the higher density dwelling units planned by the City to meet its RHNA allocation under the 2021–2029 General Plan Housing Element Update. Because the structures are the potential source of their historical significance, demolition could potentially adversely affect their historical value.

The specifications of future residential build out along Lincoln Avenue are not yet known and no physical development is proposed at this time as part of the project. However, at such time that future development proposals at the opportunity sites are considered, those development projects would be subject to adopted development guidelines/standards. This development would include mandatory CEQA review for any development requiring discretionary approval. As such, the proposed project would have less than significant impacts to the Lincoln Avenue opportunity sites as potential historical resources.



The proposed project is a programmatic update to the City’s General Plan, the Lincoln Avenue Specific Plan, the CTCC Specific Plan, the CBPC Specific Plan, and Zoning Ordinance and would not directly result in physical development. Further, the specific location and configuration of future development at the LARC and Lincoln Avenue opportunity sites have not yet been determined and are not under consideration as part the programmatic update. As such, impacts to historical resources under the proposed project would be less than significant, and no mitigation is required.

4.2.6 Level of Significance Prior to Mitigation

The proposed project would result in less than significant impacts related to cultural resources.

4.2.6.1 Regulatory Compliance Measures

As stated above under Section 4.2.4, Thresholds of Significance, the proposed project would result in less than significant impacts to archaeological resources (Threshold 4.2.2) and human remains (Threshold 4.2.3) with the incorporation of Regulatory Compliance Measures RCM CUL-1 and RCM CUL-2, respectively. These Regulatory Compliance Measures were identified in the Initial Study and would not apply to the discussion of Threshold 4.2.1 discussed in this section. However, they are listed below, as they pertain to the Cultural Resources topic.

Regulatory Compliance Measure CUL-1

Unknown Archaeological Resources. In the event that archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified archaeologist from the Orange County List of Qualified Archaeologists has evaluated the find in accordance with federal, State, and local guidelines to determine whether the find constitutes a “unique archaeological resource,” as defined in Section 21083.2(g) of the California Public Resources Code (PRC). The Applicant and its construction contractor shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the project site. Any found deposits shall be treated in accordance with federal, State and local guidelines, including those set forth in PRC Section 21083.2. Prior to commencement of grading activities, the Director of the City of Cypress (City) Community Development Department, or designee, shall verify that all project grading and construction plans include specific requirements regarding California PRC (Section 21083.2[g]) and the treatment of archaeological resources as specified above.

Regulatory Compliance Measure CUL-2

Human Remains. In the event that human remains are encountered on the project site, work within 50 feet of the discovery shall be redirected and the County



Coroner notified immediately consistent with the requirements of California Code of Regulations (CCR) Section 15064.5(e). State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be Native American, the County Coroner shall notify the Native American Heritage Commission (NAHC), which shall determine and notify a Most Likely Descendant (MLD). With the permission of the property owner, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD may recommend scientific removal and non-destructive analysis of human remains and items associated with Native American burials. Consistent with CCR Section 15064.5(d), if the remains are determined to be Native American and an MLD is notified, the City of Cypress shall consult with the MLD as identified by the NAHC to develop an agreement for treatment and disposition of the remains. Prior to the issuance of grading permits, the Director of the City of Cypress Community Development Department, or designee, shall verify that all grading plans specify the requirements of CCR Section 15064.5(e), State Health and Safety Code Section 7050.5, and PRC Section 5097.98, as stated above.

4.2.7 Level of Significance after Mitigation

No mitigation is required. The proposed project would not result in potentially significant impacts related to cultural resources.

4.2.8 Cumulative Impacts

Defined in Section 15130 of the *State CEQA Guidelines*, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and reasonably foreseeable projects in an area of interest.

According to the CTCC Specific Plan, 1,115 residential units could potentially be developed within the CTCC Specific Plan's Residential District, Senior Housing/Medium-Density Residential District, Mixed-Use Districts and Town Center District.⁶⁵ Because the Residential District encompasses the

⁶⁵ City of Cypress. 2017. Cypress Town Center and Commons Specific Plan 2.0. Website: <https://www.cypressca.org/home/showpublisheddocument/9683/637363679477400000> (accessed May 2023).



essential features of the Los Alamitos Race Course, residential development of this scale, if it occurred, would potentially impact the identified essential features. Further, as discussed in Chapter 4.0, Existing Setting, Environmental Analysis, Impacts, and Mitigation Measures, the 2045 General Plan build-out assumptions used for the proposed project’s cumulative impact analysis are based upon anticipated growth allowed under the City’s General Plan in conjunction with the City’s Transportation Analysis Zones (TAZs) land use assumptions. Under these assumptions, 1,742 new households could be developed on and around the site of the Los Alamitos Race Course, a portion of which was identified in this section’s analysis as a historical resource. Because this development is reasonably foreseeable, the loss of the essential features of the LARC would have the potential to occur regardless of whether or not the additional density on portions of the LARC site that is part of the proposed project occurs. Though certain areas subject to the CTCC Specific Plan could potentially be developed with minimal impacts to the essential features of Los Alamitos Race Course, the full anticipated 2045 General Plan build-out could result in potentially significant impacts to that historical resource. As such, it is speculative as to whether the additional density contemplated in the eastern portion of the Residential District as part of the proposed project would have any further impact on the essential features of Los Alamitos Race Course than would the development already allowed in that area pursuant to the CTCC Specific Plan.

Each development proposal received by the City that requires discretionary approval shall be subject to the requirements of CEQA, including an environmental review, if applicable. If there were any potential for significant impacts to cultural resources as a result of reasonably foreseeable development projects in Cypress, an investigation would be required to determine the nature and extent of the resources and to identify appropriate mitigation measures. As such, the proposed project’s contribution to cumulative impacts would be less than significant.



4.3 ENERGY

This section discusses energy use resulting from implementation of the 2021–2029 Cypress Housing Element Implementation Project (project) and evaluates whether the proposed project would result in the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with any applicable plans for renewable energy and energy efficiency.

4.3.1 Methodology

The proposed project does not propose or approve any specific development projects. Under current zoning, the City has the capacity to accommodate the development of up to 1,946 new housing units, which includes 504 housing units that are already entitled and/or under construction. Therefore, the proposed rezoning action that is part of the project would increase the City's development capacity to 4,260 units or an increase of 2,314 units compared to the City's existing planning and zoning documents. As such, future development of the additional 2,314 units associated with the proposed project would result in energy demand associated with construction and operational sources.

The energy use analysis in this section is based on information from the California Emissions Estimator Model (CalEEMod) version 2022.1.1.14 modeling results in Appendix D of this Draft Program Environmental Impact Report (PEIR). Operational fuel consumption (diesel fuel and gasoline) from vehicle trips was estimated for the horizon year (2045) of the proposed project based on trip estimates from CalEEMod and fuel efficiencies from the California Air Resources Board's (CARB) Emission FACTor Model (EMFAC2021) model. Estimates of fuel consumption (diesel fuel and gasoline) from construction trucks and construction worker vehicles were based on trip estimates from CalEEMod and fuel efficiencies from the CARB EMFAC2021 model.

The analysis focuses on the four sources of energy that are relevant to the proposed project: electricity, natural gas, the equipment fuel necessary for project construction, and vehicle fuel necessary for project operations. For the purposes of this analysis, the amount of electricity, natural gas, construction fuel, and fuel use from operations are quantified and compared to that consumed in Orange County. The electricity/natural gas use of the proposed project is analyzed as a whole on an annual basis.

4.3.2 Existing Environmental Setting

4.3.2.1 Electricity

Electricity 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. Electricity is used for a variety of purposes (e.g., lighting, heating, cooling, and refrigeration, and for operating appliances, computers, electronics, machinery, and public transportation systems).

According to the most recent data available, in 2020, California's electricity was generated primarily by natural gas (37.06 percent), renewable sources (33.09 percent), large hydroelectric (12.21 percent), nuclear (9.33 percent), coal (2.74 percent), and other and unspecified sources. Total



electric generation in California in 2020 was 272,576 gigawatt-hours (GWh), down 2 percent from the 2019 total generation of 277,704 GWh.¹

The City is within the service territory of Southern California Edison (SCE). SCE provides electricity to more than 15 million people in a 50,000-square-mile (sq mi) area of Central, coastal, and Southern California.² According to the California Energy Commission (CEC), total electricity consumption in the SCE service area in 2021 was 103,045 GWh (36,375 GWh for the residential sector and 51,057 GWh for the non-residential sector). Total electricity consumption in Orange County in 2021 was 18,931.8 GWh (18,931,838,624 kilowatt-hours (kWh)).³

4.3.2.2 Natural Gas

Natural gas is a non-renewable fossil fuel. Fossil fuels form when layers of decomposing plant and animal matter are exposed to intense heat and pressure under the surface of the Earth over millions of years. Natural gas is a combustible mixture of hydrocarbon compounds (primarily methane) that is used as a fuel source. Natural gas is found in naturally occurring reservoirs in deep underground rock formations. Natural gas is used for a variety of uses (e.g., heating buildings, generating electricity, and powering appliances such as stoves, washing machines and dryers, gas fireplaces, and gas grills).

Natural gas consumed in California is used for electricity generation (45 percent), residential uses (21 percent), industrial uses (25 percent), and commercial uses (9 percent). California continues to depend on out-of-state imports for nearly 90 percent of its natural gas supply.⁴

The Southern California Gas Company (SoCalGas) is the natural gas service provider for the project site. SoCalGas provides natural gas to approximately 21.8 million people in a 24,000 sq mi service area throughout Central and Southern California, from Visalia to the Mexican border.⁵ According to the CEC, total natural gas consumption in the SoCalGas service area in 2021 was 6,755 million therms (2,308 million therms for the residential sector). Total natural gas consumption in Orange County in 2021 was 580 million therms (580,187,556 therms).⁶

¹ California Energy Commission (CEC). 2021a. *2020 Total System Electric Generation*. Website: <https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2020-total-system-electric-generation> (accessed June 2023).

² Southern California Edison (SCE). 2020. About Us. Website: <https://www.sce.com/about-us/who-we-are> (accessed June 2023).

³ California Energy Commission (CEC). 2020a. Electricity Consumption by County and Entity. Website: <http://www.ecdms.energy.ca.gov/elecbycounty.aspx> and <http://www.ecdms.energy.ca.gov/elecbyutil.aspx> (accessed June 2023).

⁴ CEC. 2021b. Supply and Demand of Natural Gas in California. Website: <https://www.energy.ca.gov/data-reports/energy-almanac/californias-natural-gas-market/supply-and-demand-natural-gas-california> (accessed June 2023).

⁵ Southern California Gas Company (SoCalGas). 2020. About SoCalGas. Website: <https://www3.socalgas.com/about-us/company-profile> (accessed June 2023).

⁶ CEC. 2020b. Gas Consumption by County and Entity. Website: <http://www.ecdms.energy.ca.gov/gasbycounty.aspx> and <http://www.ecdms.energy.ca.gov/gasbyutil.aspx> (accessed June 2023).



4.3.2.3 Petroleum/Transportation Energy

Petroleum is also a non-renewable fossil fuel. Petroleum is a thick, flammable, yellow-to-black mixture of gaseous, liquid, and solid hydrocarbons that occurs naturally beneath the earth's surface. Petroleum is primarily recovered by oil drilling. It is refined into a large number of consumer products, primarily fuel oil, gasoline, and diesel.

The average fuel economy for light-duty vehicles (autos, pickups, vans, and sport utility vehicles) in the United States has steadily increased from about 14.9 miles per gallon (mpg) in 1980 to 22.9 mpg in 2020.⁷ Federal fuel economy standards have changed substantially since the Energy Independence and Security Act was passed in 2007. The Act, which originally mandated a national fuel economy standard of 35 mpg by year 2020,⁸ applies to cars and light trucks of Model Years 2011 through 2020. In March 2020, the United States Environmental Protection Agency and National Highway Traffic Safety Administration (NHTSA) finalized the Corporate Average Fuel Economy (CAFE) standards for Model Years 2024–2026 Passenger Cars and Light Trucks, further detailed below.

Gasoline is the most used transportation fuel in California, with 97 percent of all gasoline consumed by light-duty cars, pickup trucks, and sport utility vehicles. According to the most recent data available, total gasoline consumption in California was 289,918 thousand barrels or 1,464.7 trillion British thermal units (BTU) in 2020.⁹ Of the total gasoline consumption, 273,289 thousand barrels or 1,380.7 trillion BTU were consumed for transportation.¹⁰ Based on fuel consumption obtained from CARB's EMFAC2021, approximately 1.230 billion gallons of gasoline and approximately 156 million gallons of diesel will be consumed from vehicle trips in Orange County in 2023.

4.3.3 Regulatory Setting

4.3.3.1 Federal Regulations

Energy Policy Act of 2005. The Energy Policy Act of 2005 seeks to reduce reliance on non-renewable energy resources and provide incentives to reduce current demand on these resources. For example, under this Act, consumers and businesses can obtain federal tax credits for purchasing fuel-efficient appliances and products (including hybrid vehicles), building energy-efficient buildings, and improving the energy efficiency of commercial buildings. Additionally, tax credits are available for the installation of qualified fuel cells, stationary microturbine power plants, and solar power equipment.

⁷ United States Department of Transportation (USDOT). n.d. "Table 4-23: Average Fuel Efficiency of U.S. Light Duty Vehicles." Website: <https://www.bts.dot.gov/bts/bts/content/average-fuel-efficiency-us-light-duty-vehicles> (accessed June 2023).

⁸ United States Department of Energy. 2007. "Energy Independence & Security Act of 2007." Website: <https://www.afdc.energy.gov/laws/eisa> (accessed June 2023).

⁹ A British Thermal Unit is defined as the amount of heat required to raise the temperature of 1 pound of water by 1 degree Fahrenheit.

¹⁰ United States Department of Energy, Energy Information Administration (EIA). 2021a. California State Profile and Energy Estimates. Table F3: Motor gasoline consumption, price, and expenditure estimates, 2020. Website: eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_mg.html&sid=CA (accessed June 2023).



Corporate Average Fuel Economy Standards. On March 31, 2022, the National Highway Traffic Safety Administration finalized the CAFE standards for Model Years 2024–2026 Passenger Cars and Light Trucks. The amended CAFE standards would require an industry-wide fleet average of approximately 49 mpg for passenger cars and light trucks in model year 2026 by increasing fuel efficiency by 8 percent annually for model years 2024–2025, and 10 percent annually for model year 2026. The final standards are estimated to save about 234 billion gallons of gas between model years 2030 to 2050.

4.3.3.2 State Regulations

Assembly Bill 1575, Warren-Alquist Act. In 1975, largely in response to the oil crisis of the 1970s, the State Legislature adopted Assembly Bill (AB) 1575 (also known as the Warren-Alquist Act), which created the CEC. The statutory mission of the CEC is to forecast future energy needs; license power plants of 50 megawatts or larger; develop energy technologies and renewable energy resources; plan for and direct State responses to energy emergencies; and, perhaps most importantly, promote energy efficiency through the adoption and enforcement of appliance and building energy efficiency standards. AB 1575 also amended Public Resources Code Section 21100(b)(3) and *State CEQA Guidelines* Section 15126.4 to require EIRs to include, where relevant, mitigation measures proposed to minimize the wasteful, inefficient, and unnecessary consumption of energy caused by a project. Thereafter, the State Resources Agency created Appendix F to the *State CEQA Guidelines*. Appendix F assists EIR preparers in determining whether a project will result in the inefficient, wasteful, and unnecessary consumption of energy. Appendix F of the *State CEQA Guidelines* also states that the goal of conserving energy implies the wise and efficient use of energy and the means of achieving this goal, including (1) decreasing overall per capita energy consumption; (2) decreasing reliance on fossil fuels such as coal, natural gas, and oil; and (3) increasing reliance on renewable energy sources.

Senate Bill 1389, Energy: Planning and Forecasting. In 2002, the State Legislature passed Senate Bill (SB) 1389, which required the CEC to develop an integrated energy plan every 2 years for electricity, natural gas, and transportation fuels for the California Energy Policy Report. The plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero-emission vehicles (ZEVs) and their infrastructure needs, and encouragement of urban designs that reduce vehicle miles traveled (VMT) and accommodate pedestrian and bicycle access.

In compliance with the requirements of SB 1389, the CEC adopts an Integrated Energy Policy Report every 2 years and an update every other year. The most recently adopted report includes the *2021 Integrated Energy Policy Report*¹¹ and the *2022 Integrated Energy Policy Report Update*.¹² The *Integrated Energy Policy Report* covers a broad range of topics, including decarbonizing buildings,

¹¹ CEC. 2022a. *2021 Integrated Energy Policy Report*. California Energy Commission. Docket Number 21-IEPR-01.

¹² CEC. 2022b. *2022 Integrated Energy Policy Report Update*. California Energy Commission. Docket Number 22-IEPR-01.



integrating renewables, energy efficiency, energy equity, integrating renewable energy, updates on Southern California electricity reliability, climate adaptation activities for the energy sector, natural gas assessment, transportation energy demand forecast, and the California Energy Demand Forecast. The *Integrated Energy Policy Report* provides the results of the CEC’s assessments of a variety of energy issues facing California. Many of these issues will require action if the State is to meet its climate, energy, air quality, and other environmental goals while maintaining energy reliability and controlling costs.

Renewable Portfolio Standards. SB 1078 established the California Renewable Portfolio Standards program in 2002. SB 1078 initially required that 20 percent of electricity retail sales be served by renewable resources by 2017; however, this standard has become more stringent over time. In 2006, SB 107 accelerated the standard by requiring that the 20 percent mandate be met by 2010. In April 2011, SB 2 required that 33 percent of electricity retail sales be served by renewable resources by 2020. In 2015, SB 350 established tiered increases to the Renewable Portfolio Standards of 40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. In 2018, SB 100 increased the requirement to 60 percent by 2030 and required that all State's electricity to come from carbon-free resources by 2045. SB 100 took effect on January 1, 2019.¹³

Title 24, California Building Code. Energy consumption by new buildings in California is regulated by the Building Energy Efficiency Standards, embodied in Title 24 of the California Code of Regulations (CCR), known as the California Building Code (CBC). The CEC first adopted the Building Energy Efficiency Standards for Residential and Nonresidential Buildings in 1978 in response to a legislative mandate to reduce energy consumption in the State. The CBC is updated every 3 years, and the current 2022 CBC went into effect on January 1, 2023. The efficiency standards apply to both new construction and rehabilitation of both residential and non-residential buildings, and regulate energy consumed for heating, cooling, ventilation, water heating, and lighting. The building efficiency standards are enforced through the local building permit process. Local government agencies may adopt and enforce energy standards for new buildings, provided these standards meet or exceed those provided in CCR Title 24.

California Green Building Standards Code. In 2010, the California Building Standards Commission adopted Part 11 of the Title 24 Building Energy Efficiency Standards, referred to as the California Green Building Standards Code (CALGreen Code). The CALGreen Code took effect on January 1, 2011. The CALGreen Code is updated on a regular basis, with the most recent update consisting of the 2022 CALGreen Code standards that became effective January 1, 2023. The CALGreen Code established mandatory measures for residential and non-residential building construction and encouraged sustainable construction practices in the following five categories: (1) planning and design, (2) energy efficiency, (3) water efficiency and conservation, (4) material conservation and resource efficiency, and (5) indoor environmental quality. Although the CALGreen Code was adopted as part of the State’s efforts to reduce greenhouse gas (GHG) emissions, the CALGreen Code standards have co-benefits of reducing energy consumption from residential and non-residential buildings subject to the standard.

¹³ California Public Utilities Commission (CPUC). 2020. Renewables Portfolio Standard (RPS) Program. Website: <https://www.cpuc.ca.gov/rps/> (accessed June 2023).



California Energy Efficiency Strategic Plan. On September 18, 2008, the California Public Utilities Commission (CPUC) adopted California’s first Long-Term Energy Efficiency Strategic Plan, presenting a roadmap for energy efficiency in California. The Plan articulates a long-term vision and goals for each economic sector and identifies specific near-term, mid-term, and long-term strategies to assist in achieving those goals. The Plan also reiterates the following four specific programmatic goals known as the “Big Bold Energy Efficiency Strategies” that the CPUC established in Decisions D.07-10-032 and D.07-12-051:

- All new residential construction will be zero net energy (ZNE) by 2020.
- All new commercial construction will be ZNE by 2030.
- 50 percent of commercial buildings will be retrofitted to ZNE by 2030.
- 50 percent of new major renovations of State buildings will be ZNE by 2025.

4.3.3.3 Regional Regulations

There are no regional energy regulations that apply to the proposed project.

4.3.3.4 Local Regulations

Cypress Municipal Code. The City of Cypress has adopted the 2022 CALGreen Code and incorporated the CALGreen Code by reference into the City Municipal Code (Chapter 5, Buildings, Article 1, Building Code, Section 5-1 California Building Codes – Adopted).

Cypress General Plan Conservation/Open Space/Recreation Element. The following goals and policies are applicable to the proposed project:

- COSR-3:** Conserve energy resources through the use of available technology and conservation practices.
- COSR-3.1:** Encourage innovative site planning and building designs that minimize energy consumption by taking advantage of sun/shade patterns, prevailing winds, landscaping, and building materials.
- COSR-3.2:** Encourage new development and existing structures to install energy saving features.

4.3.4 Thresholds of Significance

The thresholds for energy impacts used in this analysis are consistent with Appendix G of the *State CEQA Guidelines* and the City’s *Initial Study/Environmental Checklist*. The proposed project may be deemed to have a significant impact with respect to energy if it would:

- Threshold 4.3.1:** Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
- Threshold 4.3.2:** Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?



4.3.5 Project Impacts

Threshold 4.3.1: Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. Implementation of the proposed project would increase the demand for energy through day-to-day operations and fuel consumption associated with construction activities. This section discusses energy use resulting from implementation of the proposed project and evaluates whether the proposed project would result in the wasteful, inefficient, or unnecessary consumption of energy resources.

Construction. It is important to note that the proposed project would not, in and of itself entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The proposed project would rezone sites and/or amend the General Plan to accommodate the construction of up to 2,314 additional dwelling units on the opportunity sites.

Construction activities associated with the construction of additional housing units that could occur with implementation of the project would occur through the horizon year 2045, which would cause fuel consumption associated with construction activities. Before development can take place, each discretionary development project is required to be analyzed for conformance with the General Plan, zoning requirements, and other applicable local and State requirements; comply with the requirements of CEQA; and obtain all necessary clearances and permits.

Construction activities would include grading, site preparation, building construction, architectural coating, and paving activities. Construction activities require energy associated with the manufacture and transportation of building materials, grading activities, and building construction. Construction activities also typically require electricity to power construction-related equipment and do not involve the consumption of natural gas.

Transportation energy represents the largest energy use during construction and would be from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction worker vehicles that would use petroleum fuels (e.g., diesel fuel and/or gasoline). Therefore, the analysis of energy use during construction focuses on fuel consumption. Construction trucks and vendor trucks hauling materials to and from a site would be anticipated to use diesel fuel, whereas construction workers traveling to and from a site would be anticipated to use gasoline-powered vehicles. Fuel consumption from transportation uses depends on the type and number of trips, VMT, the fuel efficiency of the vehicles, and the travel mode.

Information regarding specific development projects is not yet known; however, due to the scale of development activity associated with the proposed project, this analysis assumes that up to 2,314 additional housing units would be constructed over the approximately 22-year planning period. Construction emissions were estimated for the project using CalEEMod. This analysis assumes that construction of the additional housing units allowed under the proposed project would begin in 2023 and end in 2045, which was included in CalEEMod. Grading, site preparation, and building activities would involve the use of standard earthmoving equipment such as large excavators, cranes, and other related equipment.



Estimates of fuel consumption (diesel fuel and gasoline) from construction equipment, construction trucks, and construction worker vehicles were based on default construction equipment assumptions and trip estimates from CalEEMod and fuel efficiencies from EMFAC2021. Fuel consumption estimates are presented in Table 4.3.A. CalEEMod output sheets and detailed energy calculations are included in Appendix D of this PEIR.

Table 4.3.A: Construction Energy Consumption Estimates

Energy Type	Total Energy Consumption (gallons)
Gasoline	12,540,998.1
Diesel Fuel	3,993,660.6

Source: Compiled by LSA (June 2023).

As indicated in Table 4.3.A, the proposed project is estimated to consume 12,540,998.1 gallons of gasoline and 3,993,660.6 gallons of diesel fuel during construction. As discussed above, the proposed project would be constructed over an approximately 22-year planning period; therefore, when averaged over a 22-year period, the proposed project would consume 570,045.4 gallons of gasoline per year and 181,530.0 gallons of diesel fuel per year during construction. Based on fuel consumption obtained from EMFAC2021, 1.230 billion gallons of gasoline and approximately 156 million gallons of diesel will be consumed from vehicle trips in Orange County in 2023. Therefore, construction of the proposed project would increase the annual construction generated fuel use in Orange County by 0.1 percent for gasoline fuel usage and 0.1 percent for diesel fuel usage.

As such, project construction would have a negligible effect on local and regional energy supplies. Furthermore, impacts related to energy use during construction would be temporary and relatively small in comparison to Orange County’s overall use of the State’s available energy resources. It is not expected that future residential development would include any unusual characteristics that would necessitate the use of construction equipment that would be less energy efficient than at comparable construction sites in the region or the State. In addition, construction activities are not anticipated to result in an inefficient use of energy, as gasoline and diesel fuel would be supplied by construction contractors who would conserve the use of their supplies to minimize their costs. The proposed project would not cause or result in the need for additional energy facilities or an additional or expanded delivery system. For these reasons, fuel consumption during construction would not be inefficient, wasteful, or unnecessary.

Operation. As previously stated, the proposed project would not, in and of itself, entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The proposed project would rezone sites and/or amend the General Plan to accommodate the construction of up to 2,314 additional dwelling units on the opportunity sites.

Operational activities associated with the additional housing units would result in energy demand associated with natural gas use, electricity consumption, and fuel used for vehicle trips. Before development can take place, each discretionary development project is required to be analyzed for conformance with the General Plan, zoning requirements, and other applicable local and State requirements; comply with the requirements of CEQA; and obtain all necessary clearances and permits.



Long-term operation-related energy consumption associated with the 2,314 additional housing units that would be allowed under the proposed project was calculated using CalEEMod. Energy and natural gas consumption was estimated for the project using default energy intensities in CalEEMod. In addition, the proposed project would also result in energy usage associated with gasoline and diesel fuel consumed by project-related vehicle trips. Trip generation rates for the proposed project were based on the project’s trip generation estimates. The proposed project would generate 10,506 average daily trips. The amount of operational fuel use was estimated using CARB’s EMFAC2021 model, which provided projections for typical daily fuel usage in Orange County.

Electricity, natural gas, and fuel usage estimates associated with the proposed project are shown in Table 4.3.B.

Table 4.3.B: Project Operational Energy Consumption Estimates

Energy Type	Annual Energy Consumption
Electricity Consumption (kWh/year)	8,482,740.0
Natural Gas Consumption (therms/year)	257,064.0
Automotive Fuel Consumption	
Gasoline (gallons/year)	920,640.0
Diesel Fuel (gallons/year)	111,188.8

Source: Compiled by LSA (June 2023).

kWh = kilowatt-hours

As shown in Table 4.3.B, the estimated potential increase in electricity demand associated with the 2,314 additional housing units that would be allowed under the proposed project is 8,482,740.0 kilowatt-hours per year. Total electricity consumption in Orange County in 2021 was 18,931.8 GWh (18,931,838,624 kilowatt-hours). Therefore, operation of the proposed project would increase the annual electricity consumption in Orange County by less than 0.1 percent.

As shown in Table 4.3.B, the estimated potential increase in natural gas demand associated with the 2,314 additional housing units is 257,064.0 therms per year. Total natural gas consumption in Orange County in 2021 was 580 million therms (580,187,556 therms). Therefore, operation of the proposed project would negligibly increase the annual natural gas consumption in Orange County by less than 0.1 percent.

Electrical and natural gas demand associated with project operations would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. Furthermore, the proposed project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. All future residential development would be required to adhere to all federal, State, and local requirements for energy efficiency, including the latest Title 24 standards. Title 24 building energy efficiency standards establish minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting, which would reduce energy usage. Impacts are considered less than significant, and no mitigation is required.



Construction of the 2,314 additional housing units that would be allowed under the proposed project would also result in energy usage associated with gasoline and diesel fuel consumed by project-related vehicle trips. As shown in Table 4.3.B, fuel use associated with the vehicle trips generated by the proposed project is estimated at approximately 920,640.0 gallons of gasoline and 111,188.8 gallons of diesel fuel per year. Based on fuel consumption obtained from EMFAC2021, approximately 1,230 million gallons of gasoline and approximately 156 million gallons of diesel will be consumed from vehicle trips in Orange County in 2023. Therefore, vehicle trips associated with the proposed project would increase the annual fuel use in Orange County by approximately 0.1 percent for gasoline fuel usage and approximately 0.1 percent for diesel fuel usage. Fuel consumption associated with vehicle trips generated by project operations would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region.

Although the proposed project would result in an increase in demand for electricity, this increase would not require SCE to expand or construct infrastructure that could cause substantial environmental impacts because each of the opportunity sites are already served by utilities or directly adjacent to existing urban development. Similarly, natural gas infrastructure is not anticipated due to cumulative development. Transportation energy use would also increase; however, this transportation energy use would not represent a major amount of energy use when compared to the amount of existing development and to the total number of vehicle trips and VMT throughout Orange County and the region. As such, the build out of the 2,314 additional housing units that would be allowed under the proposed project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. Impacts would be less than significant, and no mitigation is required.

Threshold 4.3.2: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. In 2002, the State Legislature passed SB 1389, which required the CEC to develop an integrated energy plan every 2 years for electricity, natural gas, and transportation fuels for the Integrated Energy Policy Report. The plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators, in implementing incentive programs for ZEVs and their infrastructure needs, and encouragement of urban designs that reduce VMT and accommodate pedestrian and bicycle access.

The most recently adopted report includes the *2021 Integrated Energy Policy Report*¹⁴ and the *2022 Integrated Energy Policy Report Update*.¹⁵ The City of Cypress relies on the State integrated energy plan and does not have its own local plan to address renewable energy or energy efficiency.

¹⁴ CEC. 2022a. *2021 Integrated Energy Policy Report*. California Energy Commission. Docket Number 21-IEPR-01.

¹⁵ CEC. 2022b. *2020 Integrated Energy Policy Report Update*. California Energy Commission. Docket Number 22-IEPR-01.



As indicated above under Threshold 4.3.1, energy usage during project-related construction activities would be temporary in nature and would be relatively small in comparison to the overall use in Orange County. In addition, energy usage associated with operation of the proposed project would be relatively small in comparison to the overall use in Orange County and the State's available energy resources. Therefore, energy impacts at the regional level would be negligible. Because California's energy conservation planning actions are conducted at a regional level, and because the proposed project's total impact on regional energy supplies would be minor, the proposed project would not conflict with or obstruct California's energy conservation plans as described in the CEC's Integrated Energy Policy Report. Additionally, as demonstrated above under Threshold 4.3.1, the proposed project would not result in the inefficient, wasteful, and unnecessary consumption of energy. Potential impacts related to conflict with or obstruction of a State or local plan for renewable energy or energy efficiency would be less than significant, and no mitigation is required.

4.3.6 Level of Significance Prior to Mitigation

The proposed project would result in less than significant impacts related to energy, and no mitigation is required.

4.3.7 Regulatory Compliance Measures and Mitigation Measures

No regulatory compliance measures or mitigation measures are applicable to the proposed project pertaining to energy.

4.3.8 Level of Significance after Mitigation

No mitigation is required. The proposed project would not result in potentially significant impacts related to energy.

4.3.9 Cumulative Impacts

The geographic area for cumulative analysis of electricity is that of the SCE service area, while the geographic area for cumulative analysis of natural gas service is that of the SoCalGas service area. Construction of the additional 2,314 housing units associated with the proposed project would result in an increased services demand in electricity and natural gas. Although the proposed project would result in an increase in demand for electricity, this increase would not require SCE to expand or construct infrastructure that could cause substantial environmental impacts. As discussed previously, total electricity consumption in the SCE service area in 2021 was 103,045 GWh. By 2030, consumption is anticipated to increase by 12,000 GWh for the low-demand scenario and by 22,000 GWh for the high-demand scenario.¹⁶ While this forecast represents a large increase in electricity consumption, the proposed project's share of cumulative consumption would be negligible. The proposed project, in combination with cumulative development, is well within SCE's system-wide net annual increase in electricity supplies over the 2018 to 2030 period, and there are sufficient planned electricity supplies in the region for estimated net increases in energy demands.

¹⁶ CEC. 2018. *California Energy Demand, 2018–2030 Revised Forecast*. Publication Number: CEC-200-2018-002-CMF. February. Website: <https://efiling.energy.ca.gov/getdocument.aspx?tn=223244> (accessed June 2023).



Similarly, additional natural gas infrastructure is not anticipated due to cumulative development. Total natural gas consumption in the SoCalGas service area in 2021 was 6,755 million therms. Between 2018 and 2030, total natural gas consumption in the SoCalGas service area is forecast to remain steady for the low- and mid-demand scenarios and to increase by approximately 650 million therms in the high-demand scenario due to intense energy efficiency efforts.¹⁷ The proposed project's share of cumulative consumption of natural gas in the SoCalGas service area would be negligible. It is anticipated that SoCalGas would be able to meet the natural gas demand of cumulative development without additional facilities. In addition, both SCE and SoCalGas demand forecasts include the growth contemplated by the proposed project and the other cumulative development within their respective service areas. Increased energy efficiency to comply with building energy efficiency standards would reduce energy consumption on a per-square-foot basis. Furthermore, utility companies are required to increase their renewable energy sources to meet the Renewable Portfolio Standards mandate of 60 percent renewable supplies by 2030. SCE and SoCalGas plan to continue to provide reliable service to their customers and upgrade their distribution systems as necessary to meet future demand.

Transportation energy use would also increase; however, this transportation energy use would not represent a major amount of energy use compared to the amount of existing development and to the total number of vehicle trips and VMT throughout Orange County and the region. The proposed project and cumulative development are required to comply with various federal and State government legislation to improve energy efficiency in buildings, equipment, and appliances, and reduce VMT.

As such, the proposed project would not result in an inefficient, wasteful, and unnecessary consumption of energy. Therefore, the proposed project's contribution to impacts related to the inefficient, wasteful, and unnecessary consumption of energy would not be cumulatively considerable, and no mitigation is required.

¹⁷ CEC. 2018. *California Energy Demand, 2018–2030 Revised Forecast*. Publication Number: CEC-200-2018-002-CMF. February. Website: <https://efiling.energy.ca.gov/getdocument.aspx?tn=223244> (accessed June 2023).



4.4 GREENHOUSE GAS EMISSIONS

This section has been prepared for the proposed 2021–2029 Cypress Housing Element Implementation Project (project) using methodologies and assumptions recommended in the air quality impact assessment guidelines of the South Coast Air Quality Management District (SCAQMD). This section summarizes existing greenhouse gas (GHG) emissions and discusses global climate change, its causes, and the contribution of human activities. This section also estimates the likely GHG emissions that would result from construction and operational activities associated with build out of the proposed project, including vehicular traffic, energy consumption and other emission sources.

4.4.1 Methodology

The proposed project does not propose or approve any specific development projects. Under current zoning, the City of Cypress (City) has the capacity to accommodate the development of up to 1,946 new housing units, which includes 504 housing units that are already entitled and/or under construction. Therefore, the proposed rezoning action that is part of the project would increase the City's development capacity to 4,260 units or an increase of 2,314 units compared to the City's existing planning and zoning documents. As such, future development of the additional 2,314 units associated with the proposed project would result in GHG emissions from construction and operational sources.

Construction activities would generate emissions from off-road construction equipment, and on roadways as a result of construction-related truck hauling, vendor deliveries, and worker commutes. Operational GHG emissions are typically associated with mobile sources (e.g., vehicle trips), area sources (e.g., maintenance activities and landscaping), indirect emissions from sources associated with energy consumption, waste sources (land filling and waste disposal), and water sources (water supply and conveyance, treatment, and distribution). This analysis uses the California Emissions Estimator Model (CalEEMod) version 2022.1.1.14 to quantify GHG emissions for both construction and operation associated with the proposed project. CalEEMod output is contained in Appendix B of this Draft Program Environmental Impact Report (PEIR).

4.4.2 Existing Environmental Setting

Global climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans in recent decades. The Earth's average near-surface atmospheric temperature rose $0.6 \pm 0.2^\circ$ Celsius or $1.1 \pm 0.4^\circ$ Fahrenheit in the 20th century. The prevailing scientific opinion on climate change is that most of the warming observed over the last 50 years is attributable to human activities. The increased amounts of carbon dioxide (CO₂) and other GHGs are the primary causes of the human-induced component of warming. GHGs are released by the burning



of fossil fuels, land clearing, agriculture, and other activities, and lead to an increase in the greenhouse effect.¹

GHGs are present in the atmosphere naturally, are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. The gases that are widely seen as the principal contributors to human-induced global climate change are:

- CO₂
- Methane (CH₄)
- Nitrous oxide (N₂O)
- Hydrofluorocarbons (HFCs)
- Perfluorocarbons (PFCs)
- Sulfur hexafluoride (SF₆)

Over the last 200 years, humans have caused substantial quantities of GHGs to be released into the atmosphere. These extra emissions are increasing GHG concentrations in the atmosphere, and enhancing the natural greenhouse effect, which is believed to be causing global warming. While manmade GHGs include naturally occurring GHGs such as CO₂, methane, and N₂O, some gases, like HFCs, PFCs, and SF₆ are completely new to the atmosphere.

Certain gases, such as water vapor, are short-lived in the atmosphere. Others remain in the atmosphere for significant periods of time, contributing to climate change in the long term. Water vapor is excluded from the list of GHGs above because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation. For the purposes of this air quality analysis, the term “GHGs” will refer collectively to the six gases listed above.

These gases vary considerably in terms of Global Warming Potential (GWP), which is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The global warming potential is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and length of time that the gas remains in the atmosphere (“atmospheric lifetime”). The GWP of each gas is measured relative to CO₂, the most abundant GHG; the definition of GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to the ratio of heat trapped by one unit mass of CO₂ over a specified time period. GHG emissions are typically measured in terms of pounds or tons of “CO₂ equivalents” (CO₂e). Table 4.4.A shows the GWP for each type of GHG. For example, SF₆ is 23,900 times more potent at contributing to global warming than CO₂.

¹ The temperature on Earth is regulated by a system commonly known as the “greenhouse effect.” Just as the glass in a greenhouse lets heat from sunlight in and reduces the heat escaping, greenhouse gases like carbon dioxide, methane, and nitrous oxide in the atmosphere keep the Earth at a relatively even temperature. Without the greenhouse effect, the Earth would be a frozen globe; thus, although an excess of greenhouse gas results in global warming, the naturally occurring greenhouse effect is necessary to keep our planet at a comfortable temperature.



Table 4.4.A: Global Warming Potential of Greenhouse Gases

Gas	Atmospheric Lifetime (Years)	Global Warming Potential (100-Year Time Horizon)
Carbon Dioxide	50-200	1
Methane	12	25
Nitrous Oxide	114	310
HFC-23	270	11,700
HFC-134a	14	140
HFC-152a	1.4	140
PFC: Tetrafluoromethane (CF ₄)	50,000	6,500
PFC: Hexafluoromethane (C ₂ F ₆)	10,000	9,200
Sulfur Hexafluoride (SF ₆)	3,200	23,900

Source: California Air Resources Board (2017).

The following discussion summarizes the characteristics of the six GHGs and black carbon.

4.4.2.1 Carbon Dioxide

In the atmosphere, carbon generally exists in its oxidized form, as CO₂. Natural sources of CO₂ include the respiration (breathing) of humans, animals and plants, volcanic outgassing, decomposition of organic matter and evaporation from the oceans. Human-caused sources of CO₂ include the combustion of fossil fuels and wood, waste incineration, mineral production, and deforestation. Natural sources release approximately 150 billion tons of CO₂ each year, far outweighing the 7 billion tons of man-made emissions of CO₂ each year. Nevertheless, natural removal processes, such as photosynthesis by land- and ocean-dwelling plant species, cannot keep pace with this extra input of man-made CO₂; consequently, the gas is building up in the atmosphere.

In 2020, total annual CO₂ accounted for 80.2 percent of California's overall GHG emissions.² Transportation is the single largest source of CO₂ in California, which is primarily composed of on-road travel. Electricity production and industrial and residential sources also make important contributions to CO₂ emissions in California.

4.4.2.2 Methane

CH₄ is produced when organic matter decomposes in environments lacking sufficient oxygen. Natural sources include wetlands, termites, and oceans. Decomposition occurring in landfills accounts for the majority of human-generated CH₄ emissions in California and in the United States as a whole. Agricultural processes such as intestinal fermentation, manure management, and rice

² California Air Resources Board (CARB). 2022b. GHGs Descriptions and Sources in California. Website: ww2.arb.ca.gov/ghg-descriptions-sources (accessed June 2023).



cultivation are also significant sources of CH₄ in California. Total annual emissions of CH₄ accounted for 10.5 percent of GHG emissions in California in 2020.³

4.4.2.3 Nitrous Oxide

Nitrous oxide (N₂O) is produced naturally by a wide variety of biological sources, particularly microbial action in soils and water. Tropical soils and oceans account for the majority of natural source emissions. Nitrous oxide is a product of the reaction that occurs between nitrogen and oxygen during fuel combustion. Both mobile and stationary combustion emit N₂O, and the quantity emitted varies according to the type of fuel, technology, and pollution control device used, as well as maintenance and operating practices. Agricultural soil management and fossil fuel combustion are the primary sources of human-generated N₂O emissions in California. Nitrous oxide emissions accounted for 3.5 percent of GHG emissions in California in 2020.⁴

4.4.2.4 Hydrofluorocarbons, Perfluorocarbons, and Sulfur Hexafluoride

HFCs are primarily used as substitutes for ozone-depleting substances regulated under the Montreal Protocol.⁵ PFCs and SF₆ are emitted from various industrial processes, including aluminum smelting, semiconductor manufacturing, electric power transmission and distribution, and magnesium casting. There is no aluminum or magnesium production in California; however, the rapid growth in the semiconductor industry leads to greater use of PFCs. HFCs, PFCs, and SF₆ accounted for about 5.5 percent of GHG emissions in California in 2020.⁶

4.4.3 Emissions Sources and Inventories

4.4.3.1 Global Emissions

Worldwide emissions of GHGs in 2020 totaled 22.9 billion metric tons (MT) of CO₂e. Global estimates are based on country inventories developed as part of the programs of the United Nations Framework Convention on Climate Change.⁷

4.4.3.2 United States Emissions

In 2021, the year for which the most recent data are available, the United States emitted about 6,340.2 million metric tons of CO₂e (MMT CO₂e). Overall, emissions in 2021 increased by 6 percent relative to the 2020 total GHG emissions. This increase in total GHG emissions was driven by fossil

³ United States Environmental Protection Agency (USEPA). 2023. Inventory of U.S. Greenhouse Gas Emissions and Sinks. Website: <https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks#:~:text=In%202021%2C%20U.S.%20greenhouse%20gas,sequestration%20from%20the%20land%20sector> (accessed July 2023).

⁴ Ibid.

⁵ The Montreal Protocol is an international treaty that was approved on January 1, 1989, and was designated to protect the ozone layer by phasing out the production of several groups of halogenated hydrocarbons believed to be responsible for ozone depletion.

⁶ CARB. 2021. *2022 Scoping Plan Update*. May 10. Website: <https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp.pdf> (accessed June 2023).

⁷ United Nations Framework Convention on Climate Change. 2022. GHG Data from UNFCCC. Website: https://di.unfccc.int/time_series (accessed June 2023).



fuel combustion due primarily to economic activity rebounding after the height of the COVID-19 pandemic. However, GHG emissions in 2021 were 17 percent below those of 2005 levels. Of the five major sectors—residential and commercial, agricultural, industry, transportation, and electricity generation—transportation accounted for the highest amount of GHG emissions in 2021 (approximately 28 percent), with electricity generation second at 25 percent and emissions from industry third at 23 percent.⁸

4.4.3.3 State of California Emissions

The State emitted 369.2 MMT CO₂e emissions in 2020, 35.3 MMT CO₂e lower than 2019 levels and 61.8 MMT CO₂e below the 2020 GHG limit of 431 MMT CO₂e.⁹ The California Air Resources Board (CARB) estimates that transportation was the source of 37 percent of the State’s GHG emissions in 2020, which is a smaller share than recent years, as the transportation sector saw a significant decrease of 26.6 MMT CO₂e in 2020, likely due in large part to the impact of the COVID-19 pandemic. The next largest sources included industrial sources at approximately 20 percent and electricity generation at 16 percent. The remaining sources of GHG emissions were commercial and residential activities at 10 percent, agriculture at 9 percent, high GWP at 6 percent, and waste at 2 percent.¹⁰ It is expected that emissions have increased again since 2020, primarily due to economic activity rebounding after the height of the COVID-19 pandemic.

4.4.4 Regulatory Setting

4.4.4.1 Federal Regulations

The United States has historically had a voluntary approach to reducing GHG emissions. However, on April 2, 2007, the United States Supreme Court ruled that the United States Environmental Protection Agency (USEPA) has the authority to regulate CO₂ emissions under the Clean Air Act. While there currently are no adopted federal regulations for the control or reduction of GHG emissions, the USEPA commenced several actions in 2009 to implement a regulatory approach to global climate change.

This includes the 2009 USEPA final rule for mandatory reporting of GHGs from large GHG emission sources in the United States. Additionally, the USEPA Administrator signed an endangerment finding action in 2009 under the Clean Air Act, finding that six GHGs (CO₂, CH₄, N₂O, HFCs, PFCs, SF₆) constitute a threat to public health and welfare, and that the combined emissions from motor vehicles cause and contribute to global climate change, leading to national GHG emission standards.

In October 2012, the USEPA and the National Highway Traffic Safety Administration (NHTSA), on behalf of the United States Department of Transportation, issued final rules to further reduce GHG emissions and improve CAFE standards for light-duty vehicles for model years 2017 and beyond (77

⁸ USEPA. 2021. Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2019. Website: <https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks-1990-2019> (accessed June 2023).

⁹ CARB. 2022a. *California Greenhouse Gas Emissions for 2000 to 2020, Trends of Emissions and Other Indicators Report*. Website: https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020_ghg_inventory_trends.pdf (accessed June 2023).

¹⁰ Ibid.



Federal Register 62624). The NHTSA’s Corporate Average Fuel Economy (CAFE) standards have been enacted under the Energy Policy and Conservation Act since 1978. This national program requires automobile manufacturers to build a single light-duty national fleet that meets all requirements under both federal programs and the standards of California and other states. This program would increase fuel economy to the equivalent of 54.5 miles per gallon, limiting vehicle emissions to 163 grams of CO₂ per mile for the fleet of cars and light-duty trucks by model year 2025 (77 *Federal Register* 62630).

On March 31, 2022, the NHTSA finalized the CAFE standards for Model Years 2024–2026 Passenger Cars and Light Trucks. The amended CAFE standards would require an industry-wide fleet average of approximately 49 mpg for passenger cars and light trucks in model year 2026, by increasing fuel efficiency by 8 percent annually for model years 2024–2025, and 10 percent annually for model year 2026. The final standards are estimated to save about 234 billion gallons of gas between model years 2030 to 2050.

4.4.4.2 State Regulations

The CARB is the lead agency for implementing climate change regulations in the State. Since its formation, the CARB has worked with the public, the business sector, and local governments to find solutions to California’s air pollution problems. Key efforts by the State are described below.

Assembly Bill 1493 (2002). In a response to the transportation sector’s significant contribution to California’s CO₂ emissions, Assembly Bill (AB) 1493 was enacted on July 22, 2002. AB 1493 required the CARB to set GHG emission standards for passenger vehicles and light duty trucks (and other vehicles whose primary use is noncommercial personal transportation in the State) manufactured in 2009 and all subsequent model years. These standards (starting in model years 2009 to 2016) were approved by the CARB in 2004, but the needed waiver of California Clean Air Act Preemption was not granted by the USEPA until June 30, 2009. The CARB responded by amending its original regulation, now referred to as Low Emission Vehicle III, to take effect for model years starting in 2017 to 2025. The Trump administration revoked California’s preemption waiver in 2019; however, the Biden administration restored it in 2021.

Executive Order S-3-05 (2005). Governor Arnold Schwarzenegger signed Executive Order (EO) S-3-05 on June 1, 2005, which proclaimed that California is vulnerable to the impacts of climate change. To combat those concerns, the executive order established California’s GHG emissions reduction targets, which established the following goals:

- GHG emissions should be reduced to 2000 levels by 2010.
- GHG emissions should be reduced to 1990 levels by 2020.
- GHG emissions should be reduced to 80 percent below 1990 levels by 2050.

The Secretary of the California Environmental Protection Agency is required to coordinate efforts of various State agencies to collectively and efficiently reduce GHGs. A biannual progress report must be submitted to the Governor and the State Legislature disclosing the progress made toward GHG emission reduction targets. In addition, another biannual report must be submitted illustrating the



impacts of global warming on California’s water supply, public health, agriculture, the coastline, and forestry, and report possible mitigation and adaptation plans to address these impacts.

The Secretary of the California Environmental Protection Agency leads this Climate Action Team (CAT) made up of representatives from State agencies as well as numerous other boards and departments. The CAT members work to coordinate statewide efforts to implement global warming emission reduction programs and the State’s Climate Adaptation Strategy. The CAT is also responsible for reporting on the progress made toward meeting the statewide GHG targets that were established in the executive order and further defined under AB 32, the “Global Warming Solutions Act of 2006.” The first CAT Report to the Governor and the State Legislature, which was released in March 2006, laid out 46 specific emission-reduction strategies for reducing GHG emissions and reaching the targets established in the executive order. The most recent report was released in December 2020.

Assembly Bill 32 (2006), California Global Warming Solutions Act. California’s major initiative for reducing GHG emissions is AB 32, passed by the State Legislature on August 31, 2006. This legislation aimed at reducing GHG emissions to 1990 levels by 2020. The CARB has established the level of GHG emissions in 1990 at 427 million metric tons (MMT) of CO₂e. The emissions target of 427 MMT requires the reduction of 169 MMT from the State’s projected business-as-usual 2020 emissions of 596 MMT. AB 32 required the CARB to prepare a Scoping Plan outlining the main State strategies for meeting the 2020 deadline and reducing GHGs that contribute to global climate change. The Scoping Plan was approved by the CARB on December 11, 2008, and contains the main strategies California will implement to achieve the reduction of approximately 169 MMT CO₂e, or approximately 30 percent, from the State’s projected 2020 emissions level of 596 MMT CO₂e under a business-as-usual scenario (this was a reduction of 42 MMT CO₂e, or almost 10 percent from 2002–2004 average emissions). The Scoping Plan also includes CARB-recommended GHG reductions for each emissions sector of the State’s GHG inventory. The Scoping Plan calls for the largest reductions in GHG emissions to be achieved by implementing the following measures and standards:

- Improved emissions standards for light-duty vehicles (estimated reductions of 31.7 MMT CO₂e)
- The Low-Carbon Fuel Standard (15.0 MMT CO₂e)
- Energy efficiency measures in buildings and appliances and the widespread development of combined heat and power systems (26.3 MMT CO₂e)
- A renewable portfolio standard for electricity production (21.3 MMT CO₂e)

The Scoping Plan identifies 18 emission-reduction measures that address cap-and-trade programs, vehicle gas standards, energy efficiency, low carbon fuel standards, renewable energy, regional transportation-related GHG targets, vehicle efficiency measures, goods movement, solar roof programs, industrial emissions, high-speed rail, green building strategies, recycling, sustainable forests, water, and air. The measures were estimated to result in a total reduction of 174 MMT CO₂e by 2020.



On August 24, 2011, the CARB unanimously approved both the new supplemental assessment and reaproved its Scoping Plan, which provides the overall roadmap and rule measures to carry out AB 32. The CARB also approved a more robust CEQA equivalent document supporting the supplemental analysis of the cap-and-trade program. The cap-and-trade program took effect on January 1, 2012, with an enforceable compliance obligation that began January 1, 2013.

The CARB approved the First Update to the Climate Change Scoping Plan on May 22, 2014. The First Update identifies opportunities to leverage existing and new funds to further drive GHG emission reductions through strategic planning and targeted low carbon investments. The First Update defined CARB climate change priorities until 2020, and also set the groundwork to reach long-term goals set forth in EOs S-3-05 and B-16-2012. In addition, the First Update highlighted California's progress toward meeting the "near-term" 2020 GHG emission reduction goals as defined in the initial Scoping Plan. It also evaluated how to align the State's "longer-term" GHG reduction strategies with other State policy priorities for water, waste, natural resources, clean energy, transportation, and land use. CARB released a second update to the Scoping Plan, the 2017 Scoping Plan,¹¹ to reflect the 2030 target set by EO B-30-15 and codified by Senate Bill (SB) 32.

The 2022 Scoping Plan¹² was approved in December 2022. It assesses progress towards achieving the SB 32 2030 target and lays out a path to achieve carbon neutrality no later than 2045. The 2022 Scoping Plan focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

Senate Bill 97 (2007). SB 97, signed by Governor Schwarzenegger in August 2007 (Chapter 185, Statutes of 2007; Public Resources Code, Sections 21083.05 and 21097), acknowledges climate change is a prominent environmental issue that requires analysis under the California Environmental Quality Act (CEQA). This bill directed the Governor's Office of Planning and Research to prepare, develop, and transmit to the California Resources Agency guidelines for mitigating GHG emissions or the effects of GHG emissions, as required by CEQA.

The California Natural Resources Agency adopted the amendments to the *State CEQA Guidelines* in November 2018, which went into effect in December 2018. The amendments do not identify a threshold of significance for GHG emissions, nor do they prescribe assessment methodologies or specific mitigation measures. The amendments encourage lead agencies to consider many factors in performing a CEQA analysis, but preserve the discretion granted by CEQA to lead agencies in making their own determinations based on substantial evidence. The amendments also encourage public agencies to make use of programmatic mitigation plans and programs when they perform individual project analyses.

Senate Bill 375 (2008). SB 375, the Sustainable Communities and Climate Protection Act, which establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG

¹¹ CARB. 2017. *California's 2017 Climate Change Scoping Plan*. November.

¹² CARB. 2021. *2022 Scoping Plan Update*. May 10. Website: <https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp.pdf> (accessed June 2023).



emissions, was adopted by the State on September 30, 2008. On September 23, 2010, the CARB adopted the vehicular GHG emissions reduction targets that had been developed in consultation with the Metropolitan Planning Organization (MPO); the targets required a 6 to 15 percent reduction by 2020 and between 13 to 19 percent reduction by 2035 for each MPO. SB 375 recognizes the importance of achieving significant GHG reductions by working with cities and counties to change land use patterns and improve transportation alternatives. Through the SB 375 process, MPOs such as the Southern California Association of Governments (SCAG) will work with local jurisdictions in the development of a Sustainable Communities Strategy (SCS) designed to integrate development patterns and the transportation network in a way that reduces GHG emissions while meeting housing needs and other regional planning objectives. Pursuant to SB 375, the Los Angeles/Southern California reduction targets for per capita vehicular emissions were 8 percent by 2020 and are 19 percent by 2035, as shown in Table 4.4.B.

Table 4.4.B: Senate Bill 375 Regional Greenhouse Gas Emissions Reduction Targets

Metropolitan Planning Organization	By 2020 (percentage)	By 2035 (percentage)
San Francisco Bay Area	10	19
San Diego	15	19
Sacramento	7	19
Central Valley/San Joaquin	6-13	13-16
Los Angeles/Southern California	8	19

Source: California Air Resources Board (2018).

Executive Order B-30-15 (2015). Governor Jerry Brown signed EO B-30-15 on April 29, 2015, which added the immediate target of:

- GHG emissions should be reduced to 40 percent below 1990 levels by 2030.

All State agencies with jurisdiction over sources of GHG emissions were directed to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 targets. CARB was directed to update the AB 32 Scoping Plan to reflect the 2030 target. The mid-term target is critical to help frame the suite of policy measures, regulations, planning efforts, and investments in clean technologies and infrastructure needed to continue reducing emissions.

Senate Bill 350 (2015) Clean Energy and Pollution Reduction Act. SB 350, signed by Governor Brown on October 7, 2015, updates and enhances AB 32 by introducing the following set of objectives in clean energy, clean air, and pollution reduction for 2030:

- Raise California’s renewable portfolio standard from 33 percent to 50 percent; and
- Increasing energy efficiency in buildings by 50 percent by the year 2030.

The 50 percent renewable energy standard will be implemented by the California Public Utilities Commission for the private utilities and by the California Energy Commission for municipal utilities. Each utility must submit a procurement plan showing it will purchase clean energy to displace other



non-renewable resources. The 50 percent increase in energy efficiency in buildings must be achieved through the use of existing energy efficiency retrofit funding and regulatory tools already available to State energy agencies under existing law. The addition made by this legislation requires State energy agencies to plan for, and implement those programs in a manner that achieves the energy efficiency target.

Senate Bill 32, California Global Warming Solutions Act of 2016, and Assembly Bill 197. In summer 2016, the State Legislature passed, and the Governor signed, SB 32 and AB 197. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reductions target of at least 40 percent below 1990 levels by 2030 contained in Governor Brown’s April 2015 EO B-30-15. SB 32 builds on AB 32 and keeps the State on the path toward achieving its 2050 objective of reducing emissions to 80 percent below 1990 levels, consistent with an Intergovernmental Panel on Climate Change analysis of the emissions trajectory that would stabilize atmospheric GHG concentrations at 450 parts per million CO₂e and reduce the likelihood of catastrophic impacts from climate change.

The companion bill to SB 32, AB 197, provides additional direction to CARB related to the adoption of strategies to reduce GHG emissions. Additional direction in AB 197 meant to provide easier public access to air emissions data that are collected by CARB was posted in December 2016.

Senate Bill 100. On September 10, 2018, Governor Brown signed SB 100, which raises California’s Renewables Portfolio Standard requirements to 60 percent by 2030, with interim targets, and 100 percent by 2045. The bill also establishes a State policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies by December 31, 2045. Under the bill, the State cannot increase carbon emissions elsewhere in the Western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Executive Order B-55-18. EO B-55-18, signed September 10, 2018, set a goal “to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter.” EO B-55-18 directs CARB to work with relevant State agencies to ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. The goal of carbon neutrality by 2045 is in addition to other statewide goals, meaning not only should emissions be reduced to 80 percent below 1990 levels by 2050, but that, by no later than 2045, the remaining emissions be offset by equivalent net removals of CO₂e from the atmosphere, including through sequestration in forests, soils, and other natural landscapes.

Title 24, Part 11, Building Standards Code and CALGreen Code. In November 2008, the California Building Standards Commission established the California Green Building Standards Code (CALGreen Code), which sets performance standards for residential and non-residential development to reduce environmental impacts and encourage sustainable construction practices. The CALGreen Code addresses energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality. The CALGreen Code is updated every 3 years and was most recently updated in 2022 to include new mandatory measures for residential as well as non-residential uses; the new measures took effect on January 1, 2023.



California Building Efficiency Standards (Title 24, Part 6). The California Building Standards Code, or Title 24 of the California Code of Regulations contains the regulations that govern the construction of buildings in California. Within the Building Standards Code, two parts pertain to the incorporation of both energy efficient and green building elements into land use development. Part 6 is California’s Energy Efficiency Standards for Residential and Non-Residential Buildings. These standards were first adopted in 1978 in response to a legislative mandate to reduce California’s energy consumption and are updated on an approximately 3-year cycle to allow consideration and possible incorporation of new energy efficient technologies and methods. All buildings for which an application for a building permit is submitted on or after January 1, 2023, must follow the 2022 standards. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions.

Cap and Trade. The development of a cap-and-trade program was included as a key reduction measure of the CARB AB 32 Climate Change Scoping Plan. The cap-and-trade program will help put California on the path to meet its goal of achieving an 80 percent reduction of GHG emissions from 1990 levels by 2050. The cap-and-trade emissions trading program developed by the CARB took effect on January 1, 2012, with enforceable compliance obligations beginning January 1, 2013. The cap-and-trade program aims to regulate GHG emissions from the largest producers in the State by setting a statewide firm limit, or cap, on allowable annual GHG emissions. The cap was set in 2013 at approximately 2 percent below the emissions forecast for 2020. In 2014, the cap declined approximately 2 percent. Beginning in 2015 and continuing through 2020, the cap has been declining approximately 3 percent annually. The CARB administered the first auction on November 14, 2012, with many of the qualified bidders representing corporations or organizations that produce large amounts of GHG emissions, including energy companies, agriculture and food industries, steel mills, cement companies, and universities. On January 1, 2015, compliance obligation began for distributors of transportation fuels, natural gas, and other fuels. The cap-and-trade program was initially slated to sunset in 2020, but the passage of SB 398 in 2017 extended the program through 2030.

Executive Order N-79-20. EO N-79-20, which was signed by Governor Gavin Newsom on September 23, 2020, sets the following goals for the State: 100 percent of in-State sales of new passenger cars and trucks shall be zero-emission by 2035; 100 percent of medium- and heavy-duty vehicles in the State shall be zero-emission by 2045 for all operations where feasible and by 2035 for drayage trucks; and 100 percent of off-road vehicles and equipment in the State shall be zero-emission by 2035, where feasible.

California Integrated Waste Management Act. To minimize the amount of solid waste that must be disposed of in landfills, the State Legislature passed the California Integrated Waste Management Act of 1989 (AB 939), effective January 1990. According to AB 939, all cities and counties were required to divert 25 percent of all solid waste from landfill facilities by January 1, 1995, and 50 percent by January 1, 2000. Through other statutes and regulations, this 50 percent diversion rate also applies to State agencies. In order of priority, waste reduction efforts must promote source reduction, recycling and composting, and environmentally safe transformation and land disposal. In 2011, AB 341 modified the California Integrated Waste Management Act and directed the California Department of Resources Recycling and Recovery (CalRecycle) to develop and adopt regulations for



mandatory commercial recycling. AB 341 also established a statewide recycling goal of 75 percent; the 50 percent disposal reduction mandate still applies for cities and counties under AB 939, the Integrated Waste Management Act. In April 2016, AB 1826 further modified the California Integrated Waste Management Act, requiring businesses that generate a specified amount of organic waste per week to arrange for recycling services for that organic waste in a specified manner. Diverting organic waste from landfills reduces emissions of CH₄. This is equivalent to reducing anaerobic decomposition of organic waste that would have otherwise occurred in landfills where organic waste is often buried with other inorganic waste.

Low Carbon Fuel Standard. In January 2007, EO S-01-07 established a low carbon fuel standard (LCFS). This executive order calls for a statewide goal to be established to reduce the carbon intensity of California’s transportation fuels by at least 10 percent by 2020, and that an LCFS for transportation fuels be established for California. The LCFS applies to all refiners, blenders, producers, or importers (“Providers”) of transportation fuels in California, including fuels used by off-road construction equipment. In June 2007, CARB adopted the LCFS under AB 32 pursuant to Health and Safety Code Section 38560.5, and, in April 2009, CARB approved the new rules and carbon intensity reference values with new regulatory requirements taking effect in January 2011. The standards require providers of transportation fuels to report on the mix of fuels they provide and demonstrate they meet the LCFS intensity standards annually. This is accomplished by ensuring that the number of “credits” earned by providing fuels with a lower carbon intensity than the established baseline (or obtained from another party) is equal to or greater than the “deficits” earned from selling higher-intensity fuels. In response to certain court rulings, CARB re-adopted the LCFS regulation in September 2015, and the LCFS went into effect on January 1, 2016. In 2018, CARB approved amendments to the regulation to readjust carbon intensity benchmarks to meet California’s 2030 GHG reductions targets under SB 32. These amendments include opportunities to promote zero-emission vehicle (ZEV) adoption, carbon capture and sequestration, and advanced technologies for decarbonization of the transportation sector.

Advanced Clean Cars Program. In January 2012, CARB approved the Advanced Clean Cars program, which combines the control of GHG emissions and criteria air pollutants, as well as requirements for greater numbers of ZEVs, into a single package of regulatory standards for vehicle model years 2017 through 2025. The new regulations strengthen the GHG standard for 2017 models and beyond. This will be achieved through existing technologies, the use of stronger and lighter materials, and more efficient drivetrains and engines. The program’s ZEVs regulation requires battery, fuel cell, and/or plug-in hybrid electric vehicles to account for up to 15 percent of California’s new vehicle sales by 2025. The program also includes a clean fuel outlet regulation designed to support the commercialization of zero-emission hydrogen fuel cell vehicles planned by vehicle manufacturers by 2015 by requiring increased numbers of hydrogen fueling stations throughout the State. The number of stations will grow as vehicle manufacturers sell more fuel cell vehicles. By 2025, when the rules will be fully implemented, the statewide fleet of new cars and light trucks will emit 40 percent fewer GHGs and 75 percent fewer smog-forming emissions than 2012 model year vehicles.

Executive Order B-48-18. In January 2018, Governor Brown signed EO B-48-18 requiring all State entities to work with the private sector to have at least 5 million ZEVs on the road by 2030, as well as install 200 hydrogen fueling stations and 250,000 electric vehicle charging stations by 2025. It



specifies that 10,000 of the electric vehicle charging stations should be direct current fast chargers. This order also requires all State entities to continue to partner with local and regional governments to streamline the installation of ZEV infrastructure. The Governor’s Office of Business and Economic Development is required to publish a Plug-in Charging Station Design Guidebook and update the 2015 Hydrogen Station Permitting Guidebook to aid in these efforts. All State entities are required to participate in updating the 2016 Zero-Emissions Vehicle Action Plan to help expand private investment in ZEV infrastructure with a focus on serving low-income and disadvantaged communities. Additionally, all State entities are to support and recommend policies and actions to expand ZEV infrastructure at residential land uses, through the LCFS Program, and recommend how to ensure affordability and accessibility for all drivers.

4.4.4.3 Regional Regulations

South Coast Air Quality Management District. In 2008, the SCAQMD formed a Working Group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the Basin. The Working Group developed several different options that are contained in the SCAQMD 2008 draft guidance document titled Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans¹³ that could be applied by lead agencies. On September 28, 2010, SCAQMD Working Group Meeting No. 15 provided further guidance, including a tiered approach for evaluating GHG emissions for development projects where the SCAQMD is not the lead agency. The SCAQMD has not presented a finalized version of these thresholds to the governing board.

The SCAQMD identifies the emissions level for which a project would not be expected to substantially conflict with any State legislation adopted to reduce statewide GHG emissions. As such, the utilization of a service population represents the rates of emissions needed to achieve a fair share of the State’s mandated emissions reductions. Overall, the SCAQMD identifies a GHG efficiency level that, when applied statewide or to a defined geographic area, would meet the 2020 and post-2020 emissions targets as required by AB 32 and SB 32. If projects are able to achieve targeted rates of emissions per the service population, the State will be able to accommodate expected population growth and achieve economic development objectives, while also abiding by AB 32’s emissions target and future post-2020 targets.

Southern California Association of Governments. On September 3, 2020, SCAG adopted Connect SoCal—the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS) for the SCAG region.¹⁴ In general, the SCS outlines a development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce vehicle miles traveled from automobiles and light-duty trucks and thereby reduce GHG emissions from these sources. For the SCAG region, CARB has set GHG reduction targets at 19 percent below 2005 per capita emissions levels by 2035. The RTP/SCS lays out a strategy for

¹³ SCAQMD. 2008b. *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans*.

¹⁴ Southern California Association of Governments (SCAG). 2020. *Connect SoCal: The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments*. Website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176 (accessed June 2023).



the region to meet these targets. Overall, the SCS is meant to provide growth strategies that will achieve the regional GHG emissions reduction targets. Land use strategies to achieve the region's targets include planning for new growth around high-quality transit areas and livable corridors, and creating neighborhood mobility areas to integrate land use and transportation and plan for more active lifestyles.¹⁵ However, the SCS does not require that local General Plans, Specific Plans, or zoning be consistent with the SCS; SCAG is required to consider local land use controls when drafting the SCS.

South Coast Air Quality Management District. In 2008, the SCAQMD formed a Working Group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the Basin. The Working Group developed several different options that are contained in the SCAQMD 2008 draft guidance document titled *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans*¹⁶ that could be applied by lead agencies. On September 28, 2010, SCAQMD Working Group Meeting #15 provided further guidance, including a tiered approach for evaluating GHG emissions for development projects where the SCAQMD is not the lead agency. The SCAQMD has not presented a finalized version of these thresholds to the governing board.

The SCAQMD identifies the emissions level for which a project would not be expected to substantially conflict with any State legislation adopted to reduce statewide GHG emissions. As such, the utilization of a service population represents the rates of emissions needed to achieve a fair share of the State's mandated emissions reductions. Overall, the SCAQMD identifies a GHG efficiency level that, when applied statewide or to a defined geographic area, would meet the post-2020 emissions targets as required by AB 32 and SB 32. If projects are able to achieve targeted rates of emissions per the service population, the State will be able to accommodate expected population growth and achieve economic development objectives, while also abiding by AB 32's emissions target and future post-2020 targets.

4.4.4.4 Local Regulations

The City of Cypress does not currently have an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

4.4.5 Thresholds of Significance

The thresholds for greenhouse gas emissions impacts used in this analysis are consistent with Appendix G of the *State CEQA Guidelines* and the City's *Initial Study/Environmental Checklist*. The proposed project may be deemed to have a significant impact with respect to greenhouse gas emissions if it would:

¹⁵ Southern California Association of Governments (SCAG). 2020. *Connect SoCal: The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments*. Website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176 (accessed June 2023).

¹⁶ SCAQMD. 2008b. *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans*. December 5. Website: [http://www.aqmd.gov/docs/default-source/ceqa/handbook/green-house-gases-\(ghg\)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/green-house-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2) (accessed June 2023).



Threshold 4.4.1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Threshold 4.4.2: Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

4.4.5.1 Regional Emissions Thresholds

To provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents, SCAQMD convened a GHG CEQA Significance Threshold Working Group (Working Group). Based on the last Working Group meeting held in September 2010 (Meeting No. 15), SCAQMD proposed to adopt a tiered approach for evaluating GHG emissions for development projects where SCAQMD is not the lead agency:

- **Tier 1. Exemptions:** If a project is exempt from CEQA, project-level and cumulative GHG emissions are less than significant.
- **Tier 2. Consistency with a locally adopted GHG Reduction Plan:** If the project complies with a GHG emissions reduction plan or mitigation program that avoids or substantially reduces GHG emissions in the project's geographic area (i.e., city or county), project-level and cumulative GHG emissions are less than significant.
- **Tier 3. Numerical Screening Threshold:** If GHG emissions are less than the numerical screening-level threshold, project-level and cumulative GHG emissions are less than significant.

For projects that are not exempt or where no qualifying GHG reduction plans are directly applicable, SCAQMD requires an assessment of GHG emissions. SCAQMD, under Option 1, is proposing a "bright-line" screening-level threshold of 3,000 metric tons of CO₂e per year (MT CO₂e/yr) for all land use types or, under Option 2, the following land-use-specific thresholds: 1,400 MT CO₂e for commercial projects, 3,500 MT CO₂e for residential projects, or 3,000 MT CO₂e for mixed-use projects. This bright-line threshold is based on a review of the Governor's Office of Planning and Research database of CEQA projects. Based on their review of 711 CEQA projects, 90 percent of CEQA projects would exceed the bright-line thresholds identified above. Therefore, projects that do not exceed the bright-line threshold would have a nominal and therefore less than cumulatively considerable impact on GHG emissions.

- **Tier 4. Performance Standards:** If emissions exceed the numerical screening threshold, a more detailed review of the project's GHG emissions is warranted. SCAQMD has proposed an efficiency target for projects that exceed the bright-line threshold. The current recommended approach is per capita efficiency targets. SCAQMD is not recommending use of a percentage emissions reduction target. Instead, SCAQMD proposes a 2020 efficiency target of 4.8 MT CO₂e/yr per service population (MT CO₂e/yr/SP) for project-level analyses and 6.6 MT CO₂e/yr/SP for plan-level projects (e.g., program-level projects such as general plans). In addition, GHG reductions by the SB 375 target date of 2035 would be approximately 40 percent. This 40 percent reduction was applied to the 2020 targets, resulting in an efficiency threshold for plans of 4.1 MT CO₂e/yr/SP and an efficiency threshold at the project level of 3.0 MT



CO₂e/yr/SP. The GHG efficiency metric divides annualized GHG emissions by the service population, which is the sum of residents and employees, per the following equation:

$$\text{Rate of Emission: GHG Emissions (MT CO}_2\text{e/yr)} \div \text{Service Population}$$

The efficiency evaluation consists of comparing the project's efficiency metric to efficiency targets. Efficiency targets represent the maximum quantity of emissions each resident and employee in the State of California could emit in various years based on emission levels necessary to achieve the statewide GHG emissions reduction goals. A project that results in a lower rate of emissions would be more efficient than a project with a higher rate of emissions, based on the same service population. The metric considers GHG reduction measures integrated into a project's design and operation (or through mitigation).

The 3,000 MT CO₂e/yr threshold is based on a 90 percent emission “capture” rate methodology. Prior to its use by the SCAQMD, the 90 percent emissions capture approach was one of the options suggested by the California Air Pollution Control Officers Association in its CEQA & Climate Change white paper.¹⁷ A 90 percent emission capture rate means that unmitigated GHG emissions from the top 90 percent of all GHG-producing projects within a geographic area—the South Coast Air Basin (Basin) in this instance—would be subject to a detailed analysis of potential environmental impacts from GHG emissions, while the bottom 10 percent of all GHG-producing projects would be excluded from detailed analysis. A GHG significance threshold based on a 90 percent emission capture rate is appropriate to address the long-term adverse impacts associated with global climate change, because medium and large projects will be required to implement measures to reduce GHG emissions, while small projects, which are generally infill development projects that are not the focus of the State's GHG reduction targets, are allowed to proceed. Further, a 90 percent emission capture rate sets the emission threshold low enough to capture a substantial proportion of future development projects and demonstrate that cumulative emissions reductions are being achieved while setting the emission threshold high enough to exclude small projects that will, in aggregate, contribute approximate 1 percent of projected statewide GHG emissions in the Year 2050.¹⁸

In setting the threshold at 3,000 MT CO₂e per year, SCAQMD researched a database of projects kept by the Governor's Office of Planning and Research. That database contained 798 projects, 87 of which were removed because they were very large projects and/or outliers that would skew emissions values too high, leaving 711 as the sample population to use in determining the 90th percentile capture rate.¹⁹ The SCAQMD analysis of the 711 projects within the sample population combined commercial, residential, and mixed-use projects. Emissions from each of these projects were calculated by SCAQMD to provide a consistent method of emissions calculations across the

¹⁷ SCAQMD. 2008b. *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans*. December 5. Website: [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2) (accessed June 2023).

¹⁸ Ibid.

¹⁹ SCAQMD. 2009. *Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13*. August 26. Website: [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-13/ghg-meeting-13-minutes.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-13/ghg-meeting-13-minutes.pdf?sfvrsn=2) (accessed June 2023).



sample population and from projects within the sample population. In calculating the emissions, the SCAQMD analysis determined that the 90th percentile ranged between 2,983 to 3,143 MT CO₂e per year.²⁰ The SCAQMD set its significance threshold at the low-end value of the range when rounded to the nearest hundred tons of emissions (i.e., 3,000 MT CO₂e per year) to define small projects that are considered less than significant and do not need to provide further analysis.

The City understands that the 3,000 MT CO₂e per year threshold for residential/commercial uses was proposed by SCAQMD a decade ago and was adopted as an interim policy; however, no permanent, superseding policy or threshold has since been adopted. The 3,000 MT CO₂e per year threshold was developed and recommended by SCAQMD, an expert agency, based on substantial evidence as provided in the Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold²¹ document and subsequent Working Group meetings (the latest of which took place in 2010). SCAQMD has not withdrawn its support of the interim threshold and all documentation supporting the interim threshold remains on the SCAQMD website on a page that provides guidance to CEQA practitioners for air quality analysis (and where all SCAQMD significance thresholds for regional and local criteria pollutants and toxic air contaminants also are listed). Further, as stated by SCAQMD, this threshold “uses the Executive Order S-3-05 goal [80 percent below 1990 levels by 2050] as the basis for deriving the screening level” and, thus, remains valid for use in 2023.²² Lastly, this threshold has been used for hundreds, if not thousands, of GHG analyses performed for projects within the Basin. Although the threshold was never formally adopted by SCAQMD and is therefore not considered legally binding, it has been included in the discussion below in order to provide full disclosure and consistency with other CEQA documents produced by the City and other jurisdictions within the Basin. This inclusion complements the analysis of compliance with applicable air quality documents, such as the 2022 Scoping Plan and the 2020–2045 RTP/SCS presented under Threshold 4.4.2 below.

For the purpose of this analysis, the proposed project will first be compared to the SCAQMD screening-level Tier 3 Numerical Screening Threshold of 3,000 MT CO₂e/yr for all land use type projects. If it is determined that the proposed project is estimated to exceed this numerical threshold, it will then be compared to the SCAQMD-recommended 2035 efficiency-based threshold of 4.1 MT CO₂e/yr per service population for plan-level projects. As previously stated, the proposed project is also evaluated for compliance with the 2022 Scoping Plan and the 2020–2045 RTP/SCS.

4.4.6 Project Impacts

Threshold 4.4.1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

²⁰ SCAQMD. 2009. *Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13*. August 26. Website: [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-13/ghg-meeting-13-minutes.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-13/ghg-meeting-13-minutes.pdf?sfvrsn=2) (accessed June 2023).

²¹ SCAQMD. 2008a. *Draft Guidance Document – 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?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf?sfvrsn=2) (accessed June 2023).

²² Ibid.



Less Than Significant Impact. This section describes the potential construction- and operational-related GHG emissions associated with the proposed project. SCAQMD has not addressed emission thresholds for construction in its *CEQA Air Quality Handbook*; however, SCAQMD requires quantification and disclosure. Thus, this section discusses construction emissions.

Construction. It is important to note that the proposed project would not, in and of itself entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The proposed project would rezone sites and/or amend the General Plan to accommodate the construction of up to 2,314 additional dwelling units on the opportunity sites.

Construction activities associated with the construction of additional housing units that could take place during implementation of the project through the horizon year 2045 would cause short-term GHG emissions. The primary source of emissions is the operation of construction equipment. Before development can take place, each discretionary development project is required to be analyzed for conformance with the General Plan, zoning requirements, and other applicable local and State requirements; to comply with the requirements of CEQA; and to obtain all necessary clearances and permits.

Construction activities associated with the proposed project would produce combustion emissions from various sources. Construction would emit GHGs through the operation of construction equipment and from worker and builder supply vendor vehicles for the duration of the construction period. The combustion of fossil-based fuels creates GHGs such as CO₂, CH₄, and N₂O. Furthermore, the fueling of heavy equipment emits CH₄. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

As indicated above, SCAQMD does not have an adopted threshold of significance for construction-related GHG emissions. However, lead agencies are required to quantify and disclose GHG emissions that would occur during construction. The SCAQMD then requires the construction GHG emissions to be amortized over the life of the project, defined as 30 years, added to the operational emissions, and compared to the applicable interim GHG significance threshold tier. Since the new housing development allowed under the proposed rezoning actions that are part of the project would be built over a 22-year planning period, the life of the project would likely be longer than 30 years; however, to be conservative, this analysis still assumes a 30-year life.

Information regarding specific development projects is not yet known; however, due to the scale of development activity associated with the proposed project, this analysis assumes that 2,314 housing units would be constructed over the approximately 22-year planning period. Construction emissions were estimated for the project using CalEEMod. This analysis assumes that construction of the proposed project would begin in 2023 and end in 2045, which was included in CalEEMod. Site preparation, grading, and building activities would involve the use of standard earthmoving equipment such as large excavators, cranes, and other related equipment.

Using CalEEMod, it is estimated that the proposed project would generate 64,871 MT CO₂e during construction. When annualized over the 30-year life of the project, annual emissions would be 2,162.4 MT CO₂e.



Operation. As previously stated, the proposed project would not, in and of itself, entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The proposed project would rezone sites and/or amend the General Plan to accommodate the construction of up to 2,314 additional dwelling units on the opportunity sites. Before development can take place, each discretionary development project is required to be analyzed for conformance with the General Plan, zoning requirements, and other applicable local and State requirements; to comply with the requirements of CEQA; and to obtain all necessary clearances and permits.

Operational activities associated with the additional housing units would result in long-term GHG emissions associated with mobile, area, waste, water, and stationary sources as well as indirect emissions from sources associated with energy consumption. Before development can take place, each discretionary development project is required to be analyzed for conformance with the General Plan, zoning requirements, and other applicable local and State requirements; to comply with the requirements of CEQA; and to obtain all necessary clearances and permits.

Mobile source GHG emissions include project-generated vehicle trips. As discussed above, the proposed project includes the proposed rezoning actions that would allow for residential development on the opportunity sites. As identified in Section 4.9, Transportation, the proposed project would generate 10,506 average daily trips.

Energy source emissions would be generated at off-site utility providers as a result of increased electricity demand generated by the additional housing units allowed under the proposed project. The new housing units allowed under the proposed project would be designed to comply with the water efficiency and energy conservation requirements included in the California Building Standards Code (California Code of Regulations, Title 24).

Area-source emissions would be associated with architectural coatings, consumer products, and landscaping equipment. Waste source emissions generated by the proposed project include energy generated by landfilling and other methods of disposal related to transporting and managing project-generated waste. In addition, water source emissions associated with the proposed project are generated by water supply and conveyance, water treatment, water distribution, and wastewater treatment.

Following guidance from the SCAQMD, GHG emissions were estimated using CalEEMod. Table 4.4.C shows the calculated GHG emissions for the proposed project. Mobile source emissions would be the largest source of GHG emissions for the project at 67 percent of the total. Energy source emissions would be the next largest category at approximately 27 percent, and waste sources would be about 4 percent of the total emissions, respectively. In addition, water source emissions would be approximately 2 percent of the total emissions. Area sources would be less than 1 percent of the total emissions. Appendix D provides additional calculation details.

As discussed above, according to SCAQMD, a project would have less than significant GHG emissions if it would result in operational-related GHG emissions of less than 3,000 MT CO₂e/yr. Based on the analysis results, the proposed project would result in 15,016.6 MT CO₂e/yr, which would exceed the SCAQMD threshold of 3,000 MT CO₂e/yr. Therefore, consistent with the SCAQMD's interim guidance, the following discussion compares the proposed project to the efficiency-based threshold.



Table 4.4.C: Greenhouse Gas Emissions (Metric Tons Per Year)

Emission Type	Operational Emissions				
	CO ₂	CH ₄	N ₂ O	CO ₂ e	Percentage of Total
Mobile Source	8,491.8	0.3	0.3	8,596.5	67
Area Source	39.8	<0.1	<0.1	39.9	<1
Energy Source	3,410.6	0.2	<0.1	3,422.2	27
Water Source	170.1	2.8	0.1	261.4	2
Waste Source	152.7	15.3	0.0	534.2	4
Total Operational Emissions				12,854.2	100.0
Amortized Construction Emissions				2,162.4	-
Total Annual Emissions				15,016.6	-
SCAQMD Threshold				3,000.0	-
Exceeds Threshold?				Yes	-
Service Population Emissions				3.3	
SCAQMD Plan-Level Service Population Threshold				4.1	-
Exceeds Threshold?				No	-

Source: LSA (August 2023).

CH₄ = methane

N₂O = nitrous oxide

CO₂ = carbon dioxide

SCAQMD = South Coast Air Quality Management District

CO₂e = carbon dioxide equivalent

As described further in Section 4.7, Population and Housing, according to the 2017 American Housing Survey (AHS), the average household size in structures that have 50 or more housing units (the highest housing density type evaluated in the AHS) in the Los Angeles-Long Beach-Anaheim Metropolitan Statistical Area was 1.99 persons. Therefore, the additional 2,314 housing units that would potentially be built in the City would result in an increase in 4,605 residents. The proposed project would result in per service population emissions of 3.3 MT CO₂e/yr/SP, which would be below the SCAQMD’s plan-level screening threshold of 4.1 MT CO₂e/yr/SP. Therefore, operation of the proposed project would not generate significant GHG emissions that would have a significant effect on the environment. Impacts would be considered less than significant, and no mitigation is required.

Threshold 4.4.2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. An evaluation of the proposed project’s consistency with the 2022 Scoping Plan and the 2020–2045 RTP/SCS is provided below.

2022 Scoping Plan. The CARB Scoping Plan is applicable to State agencies and is not directly applicable to cities/counties and individual projects (i.e., the Scoping Plan does not require the City to adopt policies, programs, or regulations to reduce GHG emissions). However, new regulations adopted by the State agencies outlined in the Scoping Plan result in GHG emissions reductions at the local level. As a result, local jurisdictions benefit from reductions from the Scoping Plan, such as transportation emissions, increases in water efficiency in the building and landscape codes, and other Statewide actions that would affect a local jurisdiction’s emissions inventory from the top down. Statewide strategies to reduce GHG emissions include the LCFS and changes in the CAFE standards (e.g., Pavley I and Pavley California Advanced Clean Cars program). Although measures in



the Scoping Plan apply to State agencies and not the proposed project, the project's GHG emissions would be reduced by compliance with Statewide measures that have been adopted since AB 32 and SB 32 were adopted. Therefore, the proposed project was analyzed for consistency with the goals of the 2022 Scoping Plan, EO B-30-15, SB 32, and AB 197.

EO B-30-15 added the immediate target of reducing GHG emissions to 40 percent below 1990 levels by 2030. CARB released a second update to the Scoping Plan, the 2017 Scoping Plan,²³ to reflect the 2030 target set by EO B-30-15 and codified by SB 32. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reductions target of at least 40 percent below 1990 levels by 2030 contained in EO B-30-15. SB 32 builds on AB 32 and keeps us on the path toward achieving the State's 2050 objective of reducing emissions to 80 percent below 1990 levels. The companion bill to SB 32, AB 197, provides additional direction to the CARB related to the adoption of strategies to reduce GHG emissions. Additional direction in AB 197 intended to provide easier public access to air emissions data that are collected by CARB was posted in December 2016.

The 2022 Scoping Plan assesses progress toward the statutory 2030 target, while laying out a path to achieving carbon neutrality no later than 2045. The 2022 Scoping Plan focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

The 2022 Scoping Plan focuses on building clean energy production and distribution infrastructure for a carbon-neutral future, including transitioning existing energy production and transmission infrastructure to produce zero-carbon electricity and hydrogen, and utilizing biogas resulting from wildfire management or landfill and dairy operations, among other substitutes. The 2022 Scoping Plan states that in almost all sectors, electrification will play an important role. The 2022 Scoping Plan evaluates clean energy and technology options and the transition away from fossil fuels, including adding four times the solar and wind capacity by 2045 and about 1,700 times the amount of current hydrogen supply. As discussed in the 2022 Scoping Plan, EO N-79-20 requires that all new passenger vehicles sold in California will be zero-emission by 2035, and all other fleets will have transitioned to zero-emission as fully possible by 2045, which will reduce the percentage of fossil fuel combustion vehicles.

Energy measures are intended to maximize energy efficiency building and appliance standards, pursue additional efficiency efforts including new technologies and new policy and implementation mechanisms, and pursue comparable investment in energy efficiency from all retail providers of electricity in California. In addition, these measures are designed to expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings. As identified above, future projects would be required to comply with the latest Title 24 and CALGreen Code standards regarding water efficiency and energy conservation requirements. Therefore, the proposed project would comply with applicable energy measures.

²³ CARB. 2017. *California's 2017 Climate Change Scoping Plan*. November.



Water conservation and efficiency measures are intended to continue efficiency programs and use cleaner energy sources to move and treat water. Increasing the efficiency of water transport and reducing water use would reduce GHG emissions. As noted above, future projects would be required to comply with the latest Title 24 and CALGreen Code standards, which include a variety of different measures, including reduction of wastewater and water use. In addition, the future projects would be required to comply with the California Model Water Efficient Landscape Ordinance. Therefore, the proposed project would not conflict with any of the water conservation and efficiency measures.

The goal of transportation and motor vehicle measures is to develop regional GHG emissions reduction targets for passenger vehicles. Specific regional emissions targets for transportation emissions would not directly apply to the proposed project. However, vehicles traveling to the project site would comply with the Pavley II (LEV III) Advanced Clean Cars Program. The second phase of Pavley standards will reduce GHG emissions from new cars by 34 percent from 2016 levels by 2025. Therefore, the proposed project would not conflict with the identified transportation and motor vehicle measures.

SCAG’s Regional Transportation Plan/Sustainable Communities Strategy. SCAG’s 2020–2045 RTP/SCS was adopted September 3, 2020. SCAG’s RTP/SCS identifies land use strategies that focus on new housing and job growth in areas served by high quality transit and other opportunity areas would be consistent with a land use development pattern that supports and complements the proposed transportation network. The core vision in the 2020–2045 RTP/SCS is to better manage the existing transportation system by implementing transportation demand management strategies, integrating land use decisions and technological advancements, creating complete streets that are safe to all roadway users, preserving the transportation system, and expanding transit and fostering development in transit oriented communities. The 2020–2045 RTP/SCS contains transportation projects to help more efficiently distribute population, housing, and employment growth, as well as a development forecast that is generally consistent with regional-level general plan data. The forecast development pattern, when integrated with the financially constrained transportation investments identified in the 2020–2045 RTP/SCS, would reach the regional target of reducing GHG emissions from automobiles and light-duty trucks by 19 percent by 2035 (compared to 2005 levels). The 2020–2045 RTP/SCS does not require that local general plans, specific plans, or zoning be consistent with the 2020–2045 RTP/SCS, but provides incentives for consistency for governments and developers.

According to SCAG’s 2020–2045 RTP/SCS, the City’s population, households, and employment are forecast to increase by approximately 1,700 residents, 800 households, and 3,100 jobs, respectively, between 2016 and 2045.²⁴ It is important to note that the Regional Growth Forecast prepared for the 2020–2045 RTP/SCS was developed prior to the establishment of the City’s Regional Housing Needs Assessment (RHNA) allocation of 3,936 units for the 2021–2029 planning period.

²⁴ Southern California Association of Governments (SCAG). 2020. *Connect SoCal 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy*. Website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176 (accessed June 2023).



With respect to determining the proposed project’s consistency with Air Quality Management Plan growth assumptions, the projections in the Air Quality Management Plan for achieving air quality goals are based on assumptions in SCAG’s RTP/SCS regarding the City’s population, housing, and growth trends.

Although the 2021–2029 Housing Element identifies several adequate sites that are able to accommodate the development of up to 1,946 new housing units, Cypress has an unaccommodated housing need of 1,990 units to meet its estimated housing growth needs identified in the SCAG RHNA allocation of 3,936 units. As such, the proposed project would accommodate the construction of a total of 2,314 housing units on the potential housing sites.

Future development implemented in accordance with the proposed rezoning and updated land use designations would accommodate planned regional housing growth included in the SCAG RHNA. Any future projects implemented in accordance with the proposed zoning overlays and updated land use designations would be required to adhere to the City’s General Plan. Therefore, since the purpose of the proposed project is to accommodate planned regional housing growth included in the SCAG RHNA, the proposed project would not exceed the growth assumptions in the SCAG’s RTP/SCS.

Implementing SCAG’s RTP/SCS will greatly reduce the regional GHG emissions from transportation, helping to achieve statewide emissions reduction targets. Before development can take place, each discretionary development project is required to be analyzed for conformance with the General Plan, zoning requirements, and other applicable local and State requirements; to comply with the requirements of CEQA; and to obtain all necessary clearances and permits. As such, future additional housing development allowed under the proposed project would be evaluated for its potential to interfere with SCAG’s ability to achieve the region’s GHG reduction target of 19 percent below 2005 per capita emissions levels by 2035, and whether regional mobile emissions would decrease in line with the goals of the RTP/SCS.

Based on the nature of the proposed project, it is anticipated that implementation of the proposed project would not interfere with SCAG’s ability to implement the regional strategies outlined in the RTP/SCS. With implementation of Mitigation Measure GHG-1, the proposed project would not conflict with an adopted plan, policy, or regulation pertaining to GHG emissions, and impacts are considered less than significant with mitigation.

4.4.7 Level of Significance Prior to Mitigation

The proposed project would result in potentially significant impact related to GHG emissions.

4.4.8 Mitigation Measures

Mitigation Measure GHG-1 Prior to discretionary approval by the City of Cypress for residential development projects subject to CEQA (California Environmental Quality Act) review (i.e., nonexempt projects), Project Applicants shall prepare and submit a technical assessment evaluating potential project-related greenhouse gas (GHG) impacts to the City of Cypress for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management



District (SCAQMD) methodology. If project-related GHG emissions exceed applicable SCAQMD thresholds of significance and/or Statewide GHG reduction targets, the City of Cypress shall require that applicants for new development projects incorporate mitigation measures to reduce GHG emissions. Mitigation measures could include, but are not limited to, energy efficiency measures, water conservation and efficiency measures, solid waste measures, and transportation and motor vehicle measures. The identified measures shall be included as part of the conditions of approval.

4.4.9 Level of Significance after Mitigation

GHG emissions associated with the build out under the proposed project would not exceed the SCAQMD threshold of 3,000 MT CO₂e/yr or 4.1 MT CO₂e/yr/SP. Therefore, the proposed project would result in less than significant impacts related to GHG emissions.

4.4.10 Cumulative Impacts

Cumulative impacts are the collective impacts of one or more past, present, or future projects, that when combined, result in adverse changes to the environment. Climate change is a global environmental problem in which: (1) any given development project contributes only a small portion of any net increase in GHGs, and (2) global growth is continuing to contribute large amounts of GHGs across the world. Land use projects may contribute to the phenomenon of global climate change in ways that would be experienced worldwide, and with some specific effects felt in California. However, no scientific study has established a direct causal link between individual land use project impacts and global warming.

The analysis of impacts related to GHG emissions is inherently cumulative. With implementation of Mitigation Measure GHG-1, the proposed project would have no conflict with applicable statewide and regional climate action measures. In addition, as discussed above, the project's operational-related GHG emissions would not exceed the SCAQMD's numeric threshold. GHG emissions impacts associated with the proposed project would be less than significant, and therefore the cumulative impact would also be less than significant with mitigation incorporated.



4.5 LAND USE AND PLANNING

This section describes the existing land uses on the opportunity sites and in their vicinity, and evaluates the compatibility of the proposed 2021–2029 Cypress Housing Element Implementation Project (proposed project) with surrounding land uses and relevant policy and planning documents. The consistency analysis presented in this section was prepared in compliance with *State CEQA Guidelines* Section 15125(d). Information presented in this section is based on information provided in the City of Cypress (City) General Plan, the City Zoning Ordinance, the 2012 Cypress Business and Professional Center Specific Plan (CBPC Specific Plan; last amended in 2012), the Cypress Town Center and Commons Specific Plan 2.0 (CTCC Specific Plan; last amended in 2018), and the Lincoln Avenue Specific Plan (LASP; last amended in 2016). In addition, pursuant to *State CEQA Guidelines* Section 15125(d), this Draft Program Environmental Impact Report (PEIR) evaluates the proposed project’s consistency with other applicable planning documents as they relate to specific topical sections within Chapter 4.0, Existing Environmental Setting, Environmental Analysis, Impacts, and Mitigation Measures.

4.5.1 Methodology

The impact analysis presented in this Land Use and Planning section evaluates potential physical impacts of the proposed project on land use compatibility and considers whether the proposed project would result in potential inconsistencies with relevant plans or policies contained in applicable planning documents adopted by the City and other agencies. Neither CEQA nor the *State CEQA Guidelines* set forth standards for determining whether or not a project is consistent with an applicable plan; rather, the final determination that a project is consistent or inconsistent with an applicable plan is made by the Lead Agency when it acts on the project. The analysis in this PEIR discusses the findings of policy review and is meant to provide a guide for decision-makers during policy interpretation.

A project’s inconsistency with a plan or policy is only considered significant if such inconsistency would result in a significant physical environmental impact (per *State CEQA Guidelines* Section 15382). This PEIR section determines whether or not the proposed project would conflict with any adopted land use policies or programs and whether mitigation is feasible. Under this approach, a policy or program conflict is not in and of itself considered a significant environmental impact. An inconsistency between the proposed project and an applicable plan is a legal determination that may or may not indicate the likelihood of an environmental impact. In some cases, an inconsistency may be evidence that an underlying physical impact is significant and adverse.

4.5.2 Existing Environmental Setting

4.5.2.1 Geographical Setting

The City of Cypress includes approximately 6.6 square miles and is located in the northwestern portion of the County of Orange, California. The City is bordered on the north by the cities of La Palma and Buena Park, on the east by the cities of Anaheim and Stanton, on the south and west by the city of Los Alamitos, and on the west by the cities of Long Beach, Hawaiian Gardens, and Lakewood. Regional vehicular access to the City is provided via State Route 22 (SR-22), Beach



Boulevard (State Route 39 [SR-39]), State Route 91 (SR-91), and Interstates 405 and 605 (I-405 and I-605, respectively).

4.5.2.2 Existing Land Uses

Incorporated in 1956, the City of Cypress is predominantly developed with residential and commercial land uses as well as community facilities.¹ A period of rapid development followed Cypress' incorporation, which consisted mainly of single-family residential subdivisions. An extensive parks and recreation system and a large employment center in the southern section of the City have since been developed.

Cypress currently has adopted sixteen Specific Plans, which provide development guidelines for "smaller areas that have unique qualities and require focused planning attention."² Each Specific Plan is delineated in the City's General Plan Land Use Map (City of Cypress 2021). The proposed project's opportunity sites fall within three Specific Plan groupings based on the boundaries presented in the Land Use Map. The opportunity sites fall within the boundaries of the Lincoln Avenue Specific Plan (LASP), the Cypress Town Center and Commons (CTCC) Specific Plan 2.0, and the Cypress Business and Professional Center (CBPC) Specific Plan. Accordingly, the opportunity sites are considered as three separate groupings for the purpose of this analysis. These opportunity site groupings are illustrated in Figure 3-3, Opportunity Sites.

The opportunity sites, as identified in Chapter 3.0, are currently developed with a variety of uses, including but not limited to Recreation/Open Space, Commercial/Mixed Use, and Residential Uses. These uses generally correspond with the character of the Specific Plan in which they are located, which will be discussed further in Sections 4.5.3.4 and 4.5.5.

The proposed zoning and land use designation changes at the opportunity sites are intended to establish consistency between the updated 2021–2029 Housing Element and other General Plan components, including the Land Use Element as well as the three affected Specific Plans, which will be described in detail in the following sections.

4.5.3 Regulatory Setting

4.5.3.1 Federal Regulations

There are no federal regulations applicable to land use and planning.

4.5.3.2 State Regulations

California State Planning and Zoning Law. This law, which is codified in California Government Code sections 65000-66037, delegates most of the State's local land use and development decisions to cities and counties. The California Government Code establishes specific requirements pertaining to the regulation of land uses by local governments, including general plan requirements, specific

¹ City of Cypress. 2001b. Introduction to the General Plan. Website: <https://www.cypressca.org/home/showpublisheddocument/662/636123113549170000> (accessed January 16, 2024).

² City of Cypress. 2001a. *City of Cypress General Plan Land Use Element*. Website: <https://www.cypressca.org/home/showpublisheddocument/668/636123114412030000c> (accessed January 16, 2024).



plans, subdivisions, and zoning. California Government Code Section 65302 requires that all California cities and counties include the following seven elements in their general plan:

- Land Use
- Circulation
- Housing
- Conservation
- Open Space
- Noise
- Safety

Cities and counties in the San Joaquin Air Pollution Control District must also address air quality in their general plans. Cities and counties that have identified disadvantaged communities must also address environmental justice in their general plans, including air quality.³

Sustainable Communities and Climate Protection Act of 2008 (Senate Bill 375). This statute requires California’s regional planning agencies to include a Sustainable Communities Strategy (SCS) or Alternative Planning Strategy in their Regional Transportation Plans (RTP). Senate Bill 375 (SB 375) was enacted to reduce greenhouse gas emissions from automobiles and light trucks through integrated transportation, land use, housing, and environmental planning. Under the law, California’s regional planning agencies are required to include a Sustainable Communities Strategy (SCS) in their Regional Transportation Plans (RTP). The SCS provides a plan for meeting the regional emissions reduction targets established by the California Air Resources Board (CARB). If the emissions reduction targets cannot be met through the SCS, an Alternative Planning Strategy (APS) may be developed that shows how the targets would be achieved through alternative development patterns, infrastructure, or additional transportation measures of policies. SB 375 also offers local governments regulatory and other incentives to encourage more compact new development and transportation alternatives.

The requirements of SB 375 are reflected in the 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) adopted by the Southern California Association of Governments (SCAG), which serves as the regional planning agency in the six-county metropolitan region composed of Orange, Los Angeles, Ventura, Riverside, San Bernardino, and Imperial Counties. The 2020–2045 RTP/SCS is discussed in further detail below in Section 4.5.3.3.

4.5.3.3 Regional Regulations

The City of Cypress is covered by several planning documents and programs that have varying degrees of regulation over use in the City. The following paragraphs explain regional regulations, plans, and policies applicable to the opportunity sites that are analyzed in this section of the PEIR.

Southern California Association of Governments (SCAG). As discussed above, regional planning in Orange, Los Angeles, Ventura, Riverside, San Bernardino, and Imperial Counties is conducted by

³ Senate Bill (SB) 1000, adopted in 2016, requires both cities and counties that have disadvantaged communities to incorporate environmental justice (EJ) policies into their general plans, either in a separate EJ element or by integrating related goals, policies, and objectives throughout the other elements. This update, or revision if the local government already has EJ goals, policies, and objectives, must happen “upon the adoption or next revision of two or more elements concurrently on or after January 1, 2018.”



SCAG. SCAG is also the federally designated Metropolitan Planning Organization (MPO) for these six counties. As the designated MPO, SCAG is mandated by the federal government to research and prepare plans for transportation, a growth forecast, hazardous waste, and air quality. The growth forecast serves as the foundation of these plans. Of the various plans adopted by SCAG, the Regional Comprehensive Plan and the 2020–2045 RTP/SCS are relevant to the project.

Regional Transportation Plan/Sustainable Communities Strategy. On September 3, 2020, SCAG adopted the 2020–2045 Connect SoCal RTP/SCS. The 2020–2045 Connect SoCal RTP/SCS is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The overall vision for the 2020–2045 RTP/SCS is to chart a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks, planning strategies, and the people whose collaboration can improve the quality of life for Southern Californians.

The goals of Connect SoCal fall into four core categories: economy, mobility, environment, and healthy/complete communities. The plan explicitly lays out goals related to housing, transportation technologies, equity, and resilience in order to adequately reflect the increasing importance of these topics in the region, and where possible the goals have been developed to link to potential performance measures and targets. The plan’s guiding policies take these goals and focus them, creating a specific direction for plan investments.

The following goals in the 2020–2045 RTP/SCS are applicable to the proposed project:

Goal 6: Support healthy and equitable communities.

Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options.

4.5.3.4 Local Regulations

The City has preeminent decision-making authority regarding allowable land uses on the opportunity sites. As discussed in greater detail below, the City’s General Plan and Zoning Code both apply to the project; however, the three relevant Specific Plans largely govern the permitted uses on, and development standards for, the opportunity sites.

City of Cypress General Plan. The City of Cypress General Plan contains goals, policies, and plans that are intended to guide land use and development decisions. The General Plan consists of a Land Use Map and the following eight elements, or chapters, which together fulfill the State requirements for a General Plan:

- Land Use Element
- Housing Element
- Circulation Element



- Conservation/Open Space/Recreation Element (satisfies the State’s Conservation and Open Space Element requirements)
- Safety Element
- Noise Element
- Air Quality Element (optional element not required by State law)
- Growth Management Element (optional element not required by State law)

The City of Cypress General Plan was last comprehensively updated by the City Council in September 2001.

At the heart of the General Plan is the Land Use Element (2001). This element presents the City’s goals and policies directing the long-term growth, development, and revitalization of the City. The Land Use Element serves as a guide to the allocation of land use in the City and has major impacts on key issues and subject areas examined in the other elements of the General Plan. The Land Use Map, which illustrates land uses within the City, is a primary feature of the Land Use Element. Land use designations indicate the type and nature of development that is allowed in a given location. The City’s General Plan Land Use Element contains the following land use categories:

- Low Density Residential
- Medium Density Residential
- High Density Residential
- Mobile Home Park
- General and Neighborhood Commercial
- Specific Plan
- Light Industrial
- Business Park
- Community Facilities and Services

Each of these categories establishes allowed land uses and corresponding standards of compliant intensity and density. Intensity is typically more concerned with non-residential uses while density, within the context of land use, measures the residential capacity of land in terms of dwelling units per gross acre.

In addition to standards of development within the City, the General Plan Land Use Element also states various goals, along with policies designed to facilitate the achievement of each goal. The following goals and policies included in the General Plan are relevant to the proposed project:

- **Land Use Element**
 - **Goal LU-1:** Create a well balanced land use pattern that accommodates existing and future needs for housing, commercial, industrial and open space/recreation uses, while providing adequate community services to City residents.



- **Policy LU-1.2:** Allow for multi-family infill in designated areas to satisfy regional housing needs.
- **Policy LU-1.3:** Encourage mixed use development within the Lincoln Avenue Specific Plan area by providing incentives for senior citizen and multi-family housing.
- **Policy LU-1.4:** Locate residential uses within close proximity of commercial centers to encourage pedestrian access, and to provide a consumer base for commercial uses.
- **Goal LU-2:** Ensure that new development is compatible with surrounding land uses, the circulation network, availability of public facilities, and existing development constraints.
 - **Policy LU-2.1:** Ensure a sensitive transition between commercial or business park uses and residential uses by implementing precise development standards with such techniques as buffering, landscaping, and setbacks.
 - **Policy LU-2.2:** Where residential/commercial mixed use is permitted, ensure compatible integration of adjacent uses to minimize conflicts.
 - **Policy LU-2.7:** Encourage the provision of pedestrian linkages between adjacent commercial uses and commercial and residential uses to encourage pedestrian activity and reduce vehicle trips.
- **Goal LU-3:** Revitalize older commercial and residential uses and properties.
 - **Policy LU-3.1:** Encourage and continue the use of redevelopment activities in the Civic Center project area, on Lincoln Avenue, and on the Los Alamitos Race Track and Cypress Golf Club.
 - **Policy LU-3.3:** Provide incentives to encourage lot consolidation and parcel assemblage to provide expanded opportunities for coordinated development.
- **Goal LU-4:** Improve urban design in Cypress to ensure that development is both architecturally and functionally compatible and to create identifiable neighborhoods, commercial, and business park districts.
 - **Policy LU-4.2:** Encourage development projects to utilize high quality design for architecture and site planning through the City’s design review process.
 - **Policy LU-4.3:** Implement the design guidelines of the Lincoln Avenue Specific Plan to improve the overall appearance of existing buildings, streets, and parking areas consistent with the Lincoln Avenue streetscape.
 - **Policy LU-4.4:** Preserve Cypress' low density residential neighborhoods through enforcement of land use and property development standards to create a harmonious blending of buildings and landscape.
- **Goal LU-6:** Enhance the visual image and economic vitality of the Lincoln Avenue corridor.
 - **Policy LU-6.4:** Encourage mixed use development on Lincoln Avenue by providing incentives for senior citizens and multi-family housing.
 - **Policy LU-6.5:** Continue to maintain a “pedestrian scale and orientation” and improve pedestrian circulation and amenities.



- **Circulation Element**

- **Goal CIR-1:** Maintain a safe, efficient, economical, and aesthetically pleasing transportation system providing for the movement of people, goods, and services to serve the existing and future needs of the City of Cypress.
 - **Policy CIR-1.3:** Encourage development which contributes to a balanced land use, which in turn serves to reduce overall trip lengths (i.e., jobs/housing balance, locate retail in closer proximity to resident/patrons).
 - **Policy CIR-1.4:** Require new development to conform to the standards and criteria of the City of Cypress and other mandated programs. This includes mitigation of traffic impacts to the surrounding street system.
 - **Policy CIR-1.5:** The City of Cypress will continue involvement in plans and programs related to the Circulation Element. This involvement is anticipated to result in traffic studies to be undertaken by City staff, to identify specific circulation programs and improvements to be implemented, in order to satisfy the various related programs.

- **Housing Element**

- **Goal HOU-3:** Encourage the provision of a wide range of housing by location, type of unit, and price to meet the existing and future needs of Cypress residents. Establish a balanced approach to meeting housing needs of both renter and owner households.
- **Goal HOU-4:** Provide adequate housing sites through appropriate land use, zoning, and specific plan designations to accommodate the City's share of regional housing needs.
 - **Policy HOU-4.2:** Facilitate development of mixed-use projects within the Lincoln Avenue Specific Plan, including stand-alone residential development (horizontal mixed-use) and housing above ground-floor commercial uses (vertical mixed-use).
 - **Policy HOU-4.4:** Ensure compatibility of new residential development with existing development to enhance the City's residential neighborhoods.

- **Noise Element**

- **Goal N-2:** Incorporate noise considerations into land use planning decisions.

- **Air Quality Element**

- **Goal AQ-1:** Reduce air pollution through proper land use and transportation planning.

- **Growth Management Element**

- **Goal GM-1:** Reduce traffic congestion.
 - **Policy GM-4.1:** To the extent feasible, utilize information on the jobs/housing balance in the City and region as a factor in land use decision-making.



City of Cypress Zoning Ordinance. The City of Cypress Zoning Ordinance implements the policies of the Cypress General Plan by classifying and regulating the uses of land and structures within the City. The City’s Zoning Ordinance has been adopted to promote and protect the public health, safety, and general welfare of residents while preserving and enhancing the City’s aesthetic quality. The City is divided into zoning districts that directly correspond to the land use designations outlined in the Land Use Element of its General Plan. The City’s Zoning Ordinance classifies, regulates, restricts, and separates the use of land and structures, regulates and limits the bulk, height, and type of structures in the various zoning districts, and regulates areas of yards and other open areas abutting and between structures, and regulates the density of population.

The proposed project includes an amendment to the City’s Zoning Ordinance and Zoning Map to resolve potential zoning inconsistencies resulting from adoption of the 2021–2029 Housing Element, particularly concerning the opportunity sites pursuant to the City’s RHNA allocation. Specifically, potential inconsistencies could arise from proposed changes to zoning designations that would allow for residential development, and in some cases, more dense residential development, within the opportunity sites. Under the proposed project, the density of these sites would range from 8 dwelling units per acre (du/ac) to 60 du/ac.

Cypress Business and Professional Center (CBPC) Specific Plan. As set forth in the Land Use Element of the City’s General Plan, Specific Plans implement General Plan goals and policies by designating land uses, densities, development, and design standards in more specific detail. On April 17, 1990, the Cypress City Council adopted the CBPC Specific Plan, which established comprehensive guidance and regulations for the development of approximately 298 acres of land within the City. In 2012, the CBPC Specific Plan was amended. As shown in Figure 3-6, a large portion of what was previously considered the CBPC Specific Plan area is now subject to the CTCC Specific Plan. As shown in Figure 3-6, the CBPC Specific Plan is divided into nine different planning areas; however, all of Planning Area 1, most of Planning Area 8, and small portions of Planning Areas 6 and 9 are now subject to the CTCC Specific Plan.

The Specific Plan largely governs the permitted uses on, and development standards for, the opportunity sites within the CBPC Specific Plan’s boundaries.

The Professional Office designation is intended to accommodate the development of professional and administrative offices that complement the adjacent hotel center within the CBPC Specific Plan area. Permitted uses within this land use designation include a variety of office, studio, financial institutions, governmental, corporate, employment, and health service uses. Uses permitted subject to a conditional use permit include commercial, trade or vocational schools, restaurant, service stations, post offices, and other similar uses that the Community Development Director finds to be compatible with these uses, subject to review or approval by the City Council.

Other land use designations within the CBPC Specific Plan include Mixed-Use Commercial/Senior Housing, Mixed Use Business Park, Hotel and Support Commercial, and Mixed-Use Business Park/General Retail Commercial.



The following policies in the CBPC Specific Plan are relevant to the proposed project:

- **Development Plan**

- **Overall Concept**

- **Policy 1:** Encourage primarily employment generating business park and other commercial uses in the Specific Plan area, while expanding the diversity of housing by providing multifamily housing in Planning Area 5B, and senior housing and related “continuum of care” facilities in Planning Area 9.
 - **Policy 3:** Utilize site plan review as a means of authorizing the maximum and best use of each parcel of land allowed by this Specific Plan.

It should be noted that CBPC Specific Plan policies regarding the Los Alamitos Race Course are not considered in the consistency analysis in this section because the Los Alamitos Race Course currently falls within the boundaries of the CTCC Specific Plan.

Cypress Town Center and Commons (CTCC) Specific Plan 2.0. As set forth in the Land Use Element of the City’s General Plan, Specific Plans implement General Plan goals and policies by designating land uses, densities, development, and design standards in more specific detail. In June 2018, the City’s voters approved Measure A, which approved the Cypress Town Center and Commons Specific Plan 2.0 (CTCC Specific Plan).

The CTCC Specific Plan establishes a comprehensive master plan and regulatory framework for the use and development of approximately 154.4 acres of land in the City, which were formerly included in the CBPC Specific Plan area. The CTCC Specific Plan area includes the Los Alamitos Race Course property and is generally bounded by Cerritos Avenue to the north, Katella Avenue to the south, and Lexington Drive to the west.

As shown in Figure 3-4, Cypress Town Center and Commons Specific Plan 2.0 Planned Land Uses, the CTCC Specific Plan area is divided into six land use districts. One of the primary features of the CTCC Specific Plan is the town center district, which is intended to be the City's "main street" and a gathering place for the community, and will include a vibrant mix of entertainment, retail, restaurant, commercial and residential uses.

The CTCC Specific Plan’s residential district is intended to accommodate a variety of residential opportunities and lifestyles. Residential units adjacent to Cerritos Avenue will generally match the densities of the existing neighborhood north of Cerritos Avenue. Further south, smaller-lot, single-family homes are permitted, as well as single-family attached units, including townhomes and condominiums. Trails and greenways are envisioned to connect the neighborhoods and provide pedestrian and bike routes to the public parks and town center. The Senior Housing/Medium-Density Residential district allows age-restricted housing (with a qualified occupant of 55 or older), as well as multi-family housing, at a variety of densities.



Unlike the CBPC Specific Plan and the Lincoln Avenue Specific Plan, the CTCC Specific Plan does not list any unique goals or policies. Instead, it relies upon goals and policies from various City General Plan sections.⁴

Lincoln Avenue Specific Plan (LASP). As set forth in the Land Use Element of the City’s General Plan, Specific Plans implement General Plan goals and policies by designating land uses, densities, development, and design standards in more specific detail.

The Lincoln Avenue Specific Plan (LASP) was approved by the Cypress City Council in 1998. The LASP has subsequently been amended numerous times, including in 2006 to eliminate the maximum front building setback within the Campus Village land use district, in 2009 to create a new Residential R30 District and to provide for transitional housing, supportive housing, and emergency shelters in conjunction with the 2009 Housing Element Update, and in 2016 to create a Commercial Preservation Overlay.

The LASP area is situated in the northern portion of the City and extends east to west approximately 3.1 miles. Lincoln Avenue is the major east-west commercial corridor for the City. There are a wide variety of land uses within this specific plan, including, low intensity commercial, retail-commercial, service oriented, and residential uses.

As shown in Figure 3-4, Lincoln Avenue Specific Plan Planned Land Uses, the LASP is divided into nine different land use districts, which allow a mix of residential, commercial, mobile home park, public and semi-public, quasi-public, and light industrial uses.

The following goals and policies included in the LASP are relevant to the proposed project:

- **Goal 1:** Enhance the economic vitality of the Lincoln Avenue Corridor.
 - **Policy 1.5:** Locate residential uses within close proximity of commercial centers to encourage pedestrian traffic, and to provide a consumer base for commercial uses.

4.5.4 Thresholds of Significance

The thresholds for land use and planning impacts used in this analysis are consistent with Appendix G of the *State CEQA Guidelines* and the City’s *Initial Study/Environmental Checklist*. The proposed project may be deemed to have a significant impact with respect to land use and planning if it would:

Threshold 4.5.1: Physically divide an established community?

Threshold 4.5.2: Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

⁴ City of Cypress. 2017b. Cypress Town Center and Commons Specific Plan 2.0. Website: <https://www.cypressca.org/home/showpublisheddocument/9683/637363679477400000> (accessed May 2023).



Section 4.11, Land Use and Planning, of the Initial Study (Appendix A) prepared for the proposed opportunity sites occur within an urbanized area and would not physically divide an established community. Therefore, impacts related to the physical division of an established community would be less than significant, and Threshold 4.5.1 is not further addressed below.

4.5.5 Project Impacts

Threshold 4.5.2: Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. Implementation of the proposed project would result in land use changes within the City. These changes would occur exclusively within existing specific plans and would require rezoning to accommodate residential development, or higher density residential development than currently allowable, consistent with the City's RHNA allocation.

As discussed earlier in this section, a project's inconsistency with a plan or policy is only considered significant if such inconsistency would result in a significant physical environmental impact (per *State CEQA Guidelines* Section 15382). The project's consistency with relevant land use plans, policies and regulations adopted for the purpose of avoiding adverse environmental impact is discussed below. This section includes an analysis of the project's consistency with the SCAG 2020–2045 RTP/SCS, the City of Cypress (City) General Plan, the City Zoning Ordinance, the CTCC Specific Plan, the CBPC Specific Plan, and the LASP. Please note that this PEIR does not include a CTCC Specific Plan consistency analysis because the CTCC Specific Plan does not contain any unique goals or policies.

SCAG Regional Transportation Plan/Sustainable Communities Strategy. Table 4.5.A provides a consistency analysis of goals from the 2020–2045 RTP/SCS that are relevant to the proposed project. In order to eliminate repetitive policies and focus on key issues, goals that are not relevant to the proposed project are not included in Table 4.5.A. As described in Table 4.5.A, the proposed project would be consistent with applicable goals of the 2020–2045 RTP/SCS, and no mitigation is required. Furthermore, the proposed project reinforces goals contained in the 2020–2045 RTP/SCS by providing additional housing opportunities within locations near amenities and already used by the public for commercial, recreational, and/or professional uses.

City of Cypress General Plan. The proposed project's changes to land use designations would allow for residential development within the opportunity sites and provide consistency between the General Plan Land Use and Zoning Code and the updated 2021–2029 City General Plan Housing Element. Table 4.5.B provides a consistency analysis of the goals and policies from the City's General Plan that are relevant to the proposed project. In order to eliminate repetitive policies and focus on key issues, policies that are not relevant to the proposed project are not included. As highlighted in the analysis presented in Table 4.5.B, the proposed project's updates to the General Plan would ensure consistency between the project and all applicable General Plan goals and policies.



Table 4.5.A: RTP/SCS Consistency Analysis

Relevant RTP/SCS Goals	Consistency Analysis
<p>RTP/SCS Goal 6: Support healthy and equitable communities.</p>	<p>Consistent. The proposed project would support equitable communities by accommodating a variety of housing types to meet the needs of all Cypress residents, creating opportunities for attainably-priced housing for all income groups. The Regional Housing Needs Assessment (RHNA) allocation within the 2021–2029 Housing Element Update specifies various income levels for future residential developments to ensure economic diversity and inclusivity within the City’s communities. The proposed updates to the City’s zoning and specific plans would result in higher density residential areas that would create a greater sense of community and aim to preserve the character of established neighborhoods. The opportunity sites’ proximity to existing community amenities would provide residents with community spaces within walking distance. Therefore, the proposed project would be consistent with Goal 6 in the 2020–2045 RTP/SCS.</p>
<p>RTP/SCS Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options.</p>	<p>Consistent. The proposed project would amend the City’s Zoning Ordinance and specific plans to provide adequate potential housing sites with corresponding density to provide the needed units to meet the City’s RHNA allocation as stated in the 2021–2029 Housing Element. The project would accommodate the appropriate distribution of new housing throughout the City. The opportunity sites are located within previously developed areas of the City and are accessible by walking, biking, or driving via existing streets. Additionally, Orange County Transportation Authority (OCTA) operates bus service in the City along Lincoln Avenue and Katella Avenue, which include many of the opportunity sites.¹ Therefore, another transportation option available at the proposed project’s opportunity sites would be public transit. As such, the proposed project would be consistent with Goal 9 in the 2020–2045 RTP/SCS.</p>

Source: Southern California Association of Governments. 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

¹ Orange County Transportation Authority. West/Central County System Map. Website: <https://www.octa.net/ebusbook/routePdf/County.pdf?n=2023> (accessed May 2023).



Table 4.5.B: General Plan Consistency Analysis

Relevant General Plan Goals/Policies	Consistency Analysis
<p>Goal LU-1: Create a well balanced land use pattern that accommodates existing and future needs for housing, commercial, industrial and open space/recreation uses, while providing adequate community services to City residents.</p>	<p>Consistent. The opportunity sites were selected because of their potential ability to accommodate the housing needs allocated to the City by the SCAG Regional Housing Needs Assessment (RHNA) adopted in the City’s 2021–2029 Housing Element update. The proposed project seeks to establish consistency across the City’s land use documents to ensure that planning decisions are informed and balanced. Therefore, the proposed project would be consistent with Goal LU-1 of the City’s General Plan.</p>
<p>Policy LU-1.2: Allow for multi-family infill in designated areas to satisfy regional housing needs.</p>	<p>Consistent. Though the proposed project does not involve development itself, it provides a framework for future development within the opportunity site areas. Objective 4 of the proposed project, which can be found in Section 3.5 of Chapter 3.0, Project Description, seeks to “promote land uses that transform now-vacant or under-utilized sites.” Therefore, infill development is a priority consideration for future development within the opportunity sites under the proposed project. The project will provide infill housing opportunities to satisfy the City’s RHNA requirements. Therefore, the proposed project would be consistent with Policy LU-1.2 of the City’s General Plan.</p>
<p>Policy LU-1.3: Encourage mixed use development within the Lincoln Avenue Specific Plan area by providing incentives for senior citizen and multi-family housing.</p>	<p>Consistent. Though the proposed project does not involve development itself, it provides a framework for future development within the opportunity sites. As illustrated by Figure 3-3, Opportunity Sites, many of the proposed opportunity sites are within the Lincoln Avenue corridor, and therefore the LASP. Because the corridor is already developed with various commercial uses, it is reasonable to assume that a portion of future residential developments would fall under the mixed-use category. While the proposed project does not necessarily contain provisions for senior housing, the land use designations could accommodate senior housing. Further, many of the opportunity sites along Lincoln Avenue would likely need to be multi-family housing developments in order to accommodate the proposed density of 30 dwelling units per acre (du/ac). Therefore, the proposed project would be consistent with Policy LU-1.3 of the City’s General Plan.</p>
<p>Policy LU-1.4: Locate residential uses within close proximity of commercial centers to encourage pedestrian access, and to provide a consumer base for commercial uses.</p>	<p>Consistent. Some of the future developments enabled by the proposed project would be located at the opportunity sites along Lincoln Avenue (see Figure 3-3, Opportunity Sites). The Lincoln Avenue corridor is already a commercial hub, so the increased residential densities under the proposed project could potentially increase the existing consumer base and improve the walkability of the area. As far as the opportunity sites along Katella Avenue within the CTCC and CBPC Specific Plans, pedestrian access to the commercial and business uses for residents would also allow for a potentially increased consumer base. Therefore, the proposed project would be consistent with Policy LU-1.4 of the City’s General Plan.</p>



Table 4.5.B: General Plan Consistency Analysis

Relevant General Plan Goals/Policies	Consistency Analysis
<p>Goal LU-2: Ensure that new development is compatible with surrounding land uses, the circulation network, availability of public facilities, and existing development constraints.</p>	<p>Consistent. The opportunity sites are within areas of existing development. Therefore, during site plan review, the City would consider the compatibility of any new residential dwelling units with the site’s surroundings. Additionally, each opportunity site is within an area that is already designated for residential or commercial development.¹ Thus, the opportunity sites would not mark a substantial departure from existing uses and are not subject to any relevant development constraints. As discussed in Section 4.7, Population and Housing, of this PEIR, the opportunity sites are already served by existing roads and would not involve the extension of roads or other infrastructure. Therefore, the development would be compatible with the existing circulation network. The proposed project’s relationship to the availability of public facilities is discussed in Section 4.8, Public Services, of this PEIR. As described in that section, all impacts of the proposed project on public services would be either less than significant prior to mitigation or reduced to a less than significant level by Regulatory Compliance Measures RCM PS-1 and RCM PS-2 in Section 4.8, Public Services, of this PEIR. This would make the proposed project consistent with the availability of public facilities. Therefore, the proposed project would be consistent with all aspects of Goal LU-2 of the City’s General Plan.</p>
<p>Policy LU-2.1: Ensure a sensitive transition between commercial or business park uses and residential uses by implementing precise development standards with such techniques as buffering, landscaping, and setbacks.</p>	<p>Consistent. Though the proposed project does not involve development itself, it would provide a framework for future development within the opportunity sites. Any future development proposals within these areas would be required to comply with applicable buffering, landscaping, and buffering standards of the City or relevant Specific Plan. Therefore, future residential uses made possible by the proposed project would be designed in a way that ensures a sensitive transition between commercial, business, and residential uses. As such, the proposed project would be consistent with all aspects of Policy LU-2.1 of the City’s General Plan.</p>
<p>Policy LU-2.2: Where residential/commercial mixed use is permitted, ensure compatible integration of adjacent uses to minimize conflicts.</p>	<p>Consistent. All new residential development allowed under the proposed project is planned for areas that are already designated for residential or commercial development. Additional housing units under the proposed project would contribute to this mixed use without adding any inconsistent uses or interfering with either use. Future development proposals would be reviewed by the City for compatibility with surrounding land uses consistent with the City’s Zoning and Specific Plan requirements. Therefore, the proposed project would be consistent with Policy LU-2.2 of the City’s General Plan.</p>
<p>Policy LU-2.7: Encourage the provision of pedestrian linkages between adjacent commercial uses and commercial and residential uses to encourage pedestrian activity and reduce vehicle trips.</p>	<p>Consistent. Given that the opportunity sites are within areas of the City that already attract patrons for commercial uses, the increased residential development capacity under the proposed project could reduce vehicle trips by providing residents with the ability to walk between residences and commercial centers. The proximity itself would serve to encourage pedestrian activity and decreased vehicle trips. Therefore, the proposed project would be consistent with Policy LU-2.7 of the City’s General Plan.</p>



Table 4.5.B: General Plan Consistency Analysis

Relevant General Plan Goals/Policies	Consistency Analysis
<p>Goal LU-3: Revitalize older commercial and residential uses and properties.</p>	<p>Consistent. Though the proposed project does not involve development itself, it would provide a framework for future development within the opportunity sites. Objective 4 of the proposed project, which can be found in Section 3.5 of Chapter 3.0, Project Description, seeks to “promote land uses that transform now-vacant or under-utilized sites.” Many of the existing buildings at the opportunity sites are currently used for commercial and/or residential purposes. The proposed project would seek to revitalize some of the properties within these Specific Plan boundaries that are older and not necessarily reaching their full use potential. Therefore, the proposed project would be consistent with Goal LU-3 of the City’s General Plan.</p>
<p>Policy LU-3.1: Encourage and continue the use of redevelopment activities in the Civic Center project area, on Lincoln Avenue, and on the Los Alamitos Race Track and Cypress Golf Club.</p>	<p>Consistent. Though the proposed project does not involve development itself, it would provide a framework for future development within the opportunity sites. The rezoning that would take place under the proposed project would involve redevelopment within the opportunity sites and encourage residential uses. As shown in Figure 3-3, Opportunity Sites, many of the opportunity sites are located on or adjacent to the Los Alamitos Race Course and the Lincoln Avenue corridor. Therefore, the proposed project would not only encourage, but would directly facilitate the redevelopment of the areas mentioned in this policy. As such, Therefore, the proposed project would be consistent with Policy LU-3.1 of the City’s General Plan.</p>
<p>Policy LU-3.3: Provide incentives to encourage lot consolidation and parcel assemblage to provide expanded opportunities for coordinated development.</p>	<p>Consistent. Though the proposed project does not involve development itself, it would provide a framework for future development within the opportunity sites. The project does not contain any incentives, financial or otherwise, for the encouragement of any particular coordinated development strategies. However, it does enable coordinated residential development along a series of parcels based on allowable densities under rezoning plans. Within this residential development, lot consolidation and parcel assemblage could potentially occur, dependent upon future proposal plans enabled by the project. Therefore, the proposed project would be consistent with Policy LU-3.3 of the City’s General Plan.</p>
<p>Policy LU-4.2: Encourage development projects to utilize high quality design for architecture and site planning through the City’s design review process.</p>	<p>Consistent. Though the proposed project does not involve development itself, it would provide a framework for future development within the opportunity sites. Any future residential development proposals would be subject to City or applicable Specific Plan guidelines, which reflect strict standards of architecture and other design aspects. These developments would also be subject to the City’s design review process, as with any development. Therefore, the proposed project would be consistent with Policy LU-4.2 of the City’s General Plan.</p>
<p>Policy LU-4.3: Implement the design guidelines of the Lincoln Avenue Specific Plan to improve the overall appearance of existing buildings, streets, and parking areas consistent with the Lincoln Avenue streetscape.</p>	<p>Any reasonably foreseeable development proposals within the opportunity sites inside the LASP boundaries would be subject to the LASP design guidelines and standards, which would ensure that such developments would be visually compatible with the existing visual character of the area. Such development could even bring about potential improvements to the visual character</p>



Table 4.5.B: General Plan Consistency Analysis

Relevant General Plan Goals/Policies	Consistency Analysis
	of the area through new landscaping, lighting, or other design features. Therefore, the proposed project would be consistent with Policy LU-4.3 of the City’s General Plan.
<p>Policy LU-4.4: Preserve Cypress’ low density residential neighborhoods through enforcement of land use and property development standards to create a harmonious blending of buildings and landscape.</p>	<p>Consistent. The zoning and land use designation changes proposed by the project reflect a shift from commercial/lower density zoning in favor of medium to high residential zoning, in some cases up to 60 du/ac. The higher density is intended to accommodate the City’s RHNA allocation of dwelling units. Future projects would be reviewed for buffering and design considerations when higher density development is located adjacent to lower density land uses. The CTCC and CBPC Specific Plans are located in areas characterized by office and commercial uses and medium density housing. Therefore, the proposed project would be consistent with Policy LU-4.4 of the City’s General Plan.</p>
<p>Goal LU-6: Enhance the visual image and economic vitality of the Lincoln Avenue corridor.</p>	<p>Consistent. The proposed project would allow higher density residential areas along Lincoln Avenue, which could improve the economic vitality of the Lincoln Avenue corridor by increasing the existing consumer base with new residents in close proximity. Given the proximity of the proposed Lincoln Avenue opportunity sites to existing retail locations, residents would be able to walk to many businesses. Additionally, as they fall within the boundaries of the LASP, any future developments within the Lincoln Avenue opportunity sites would be subject to the LASP design guidelines and standards, which would function to maintain the visual image of the area. Therefore, the proposed project would be consistent with Goal LU-6 of the City’s General Plan.</p>
<p>Policy LU-6.4: Encourage mixed use development on Lincoln Avenue by providing incentives for senior citizens and multi-family housing.</p>	<p>Consistent. Though the proposed project does not involve development itself, it would provide a framework for future development within the opportunity sites. As illustrated by Figure 3-3, Opportunity Sites, many of the opportunity sites are located within the Lincoln Avenue corridor. Because the corridor is already developed with various commercial uses, it is reasonable to assume that a portion of future residential developments would fall under the mixed-use category. While the proposed project does not necessarily contain provisions for senior housing, future projects could incorporate or provide senior housing when actual plans are proposed. Further, many opportunity sites along Lincoln Avenue would likely need to be multi-family housing developments in order to provide housing types at the densities over 15 du/ac. Therefore, the proposed project would be consistent with Policy LU-6.4 of the City’s General Plan.</p>
<p>Policy LU-6.5: Continue to maintain a “pedestrian scale and orientation” and improve pedestrian circulation and amenities.</p>	<p>Consistent. Design specifications of future residential developments would be made available at the time such development is proposed. However, it is reasonable to assume that future development made possible by the proposed project would continue to maintain a pedestrian scale and orientation for the sake of consistency with the General Plan. Under the proposed project’s opportunity sites along Lincoln Avenue, residential areas of up to 30 du/ac would be located directly</p>



Table 4.5.B: General Plan Consistency Analysis

Relevant General Plan Goals/Policies	Consistency Analysis
	adjacent to commercial uses. Similarly, the opportunity sites within the CTCC and CBPC Specific Plans would locate residential uses of varying densities adjacent to commercial, professional, and mixed-use developments. These proximities would encourage pedestrian circulation between residential and commercial uses. Therefore, the proposed project would be consistent with Policy LU-6.5 of the City’s General Plan.
Goal CIR-1: Maintain a safe, efficient, economical, and aesthetically pleasing transportation system providing for the movement of people, goods, and services to serve the existing and future needs of the City of Cypress.	Consistent. As part of this PEIR’s impact analysis on transportation, a Level of Service (LOS) analysis was completed for 26 signalized intersections with the potential to be affected by the proposed project. The analysis compared the proposed project and found that it would not be expected to create significant LOS impacts under General Plan Build out conditions. Therefore, the proposed project would not interfere with the maintenance of the City’s transportation system and would be consistent with Goal CIR-1 of the City’s General Plan.
Policy CIR-1.3: Encourage development which contributes to a balanced land use, which in turn serves to reduce overall trip lengths (i.e., jobs/housing balance, locate retail in closer proximity to resident/patrons).	Consistent. Because the proposed project would enable particular areas of higher density residential development within close proximity to existing retail locations, it can be reasonably assumed that overall trip lengths may be shortened. Objective 3 of the proposed project, which can be found in Section 3.5 of Chapter 3.0, Project Description, seeks to implement sustainable planning and development practices by creating compact new developments and walkable neighborhoods to minimize the City’s contribution to greenhouse gas emissions (GHGs) and energy usage. This development would also potentially provide residents with employment opportunities within walking distance. Therefore, the proposed project would be consistent with Policy CIR-1.3 of the City’s General Plan.
Policy CIR-1.4: Require new development to conform to the standards and criteria of the City of Cypress and other mandated programs. This includes mitigation of traffic impacts to the surrounding street system.	Consistent. As part of the environmental review process for the proposed project, a Level of Service (LOS) analysis pertaining to the project was conducted in May 2023. The analysis evaluated the potential circulation changes resulting from the implementation of the proposed project as required by the California Environmental Quality Act (CEQA). The assessment found that the proposed project would not result in any significant changes to LOS under General Plan build-out conditions. Had any impacts to LOS been discovered in this assessment, CEQA would have required the mitigation of these impacts. Therefore, the proposed project would be consistent with Policy CIR-1.4 of the City’s General Plan.
Policy CIR-1.5: The City of Cypress will continue involvement in plans and programs related to the Circulation Element. This involvement is anticipated to result in traffic studies to be undertaken by City staff, to identify specific circulation programs and improvements to be implemented, in order to satisfy the various related programs.	Consistent. As part of the environmental review process for the proposed project, a Level of Service analysis pertaining to the project was conducted in May 2023 (Appendix G of this PEIR). The analysis evaluated the potential circulation changes resulting from the implementation of the proposed project as required by CEQA. Future traffic studies may be performed as part of the environmental review process of future residential development proposals made possible by the proposed project. Therefore, the proposed project would be consistent with Policy CIR-1.5 of the City’s General Plan.



Table 4.5.B: General Plan Consistency Analysis

Relevant General Plan Goals/Policies	Consistency Analysis
<p>Goal HOU-3: Encourage the provision of a wide range of housing by location, type of unit, and price to meet the existing and future needs of Cypress residents. Establish a balanced approach to meeting housing needs of both renter and owner households.</p>	<p>Consistent. The proposed project seeks to update various City planning documents in order to establish consistency with its 2021–2029 Housing Element Update, which addresses the City’s RHNA allocation for the 6th Housing Element Cycle. The project’s opportunity sites have been specifically selected for their ability to accommodate this magnitude of new housing so that the community’s housing needs can be met. Objective 5 of the proposed project, which can be found in Section 3.5 of Chapter 3.0, Project Description, of this PEIR, seeks to provide high-quality housing in a variety of forms, sizes, and densities to serve the City’s diverse population. Therefore, the range of housing opportunities that would be allowed under the proposed project’s rezoning is intended to be diverse. Furthermore, the RHNA housing allocation accounts for income level, with different unit amounts based upon affordability. Under the proposed project, the proposed residential densities on the opportunity sites would range from 8 du/ac to 60 du/ac (see Figure 3-3, Opportunity Sites). Therefore, the proposed project would provide the City with a range of housing types. The proposed project would also provide for new housing options in several different areas of the City. More specifically, the Lincoln Avenue opportunity sites are located in the northern part of the City, while the opportunity sites along Katella Avenue are in the City’s southwest corner (see Figure 3-3, Opportunity Sites). Each opportunity site is located within a Specific Plan, which each has its own sense of character. As such, the housing opportunities under the proposed project would provide a range of location options. Therefore, the proposed project would be consistent with Goal HOU-3 of the City’s General Plan.</p>
<p>Goal HOU-4: Provide adequate housing sites through appropriate land use, zoning, and specific plan designations to accommodate the City’s share of regional housing needs.</p>	<p>Consistent. In order to meet the need for additional housing in accordance with the City’s RHNA allocation, the proposed project would rezone/redesignate several opportunity sites to allow for low to high density residential development. The opportunity sites within the CTCC Specific Plan would be rezoned to allow for a density of up to 30 du/ac. The opportunity site within the CBPC Specific Plan would be rezoned from a Senior Housing/ Professional Office/Hotel and Support Commercial zone to a High Density Residential area of up to 60 du/ac. The LASP opportunity sites would be rezoned to allow for up to 30 du/ac in districts in which this density had previously not been allowed. All aforementioned updates are designed with the intent to meet the City’s RHNA allocation; Objective 2 of the proposed project, which can be found in Section 3.5 of Chapter 3.0, Project Description, of this PEIR, seeks to meet the City’s housing needs as identified in the RHNA. Furthermore, the project would increase the number of housing choices for residents that are lower income as per RHNA allocations. Therefore, the proposed project would be consistent with Goal HOU-4 of the City’s General Plan.</p>



Table 4.5.B: General Plan Consistency Analysis

Relevant General Plan Goals/Policies	Consistency Analysis
<p>Policy HOU-4.2: Facilitate development of mixed-use projects within the Lincoln Avenue Specific Plan, including stand-alone residential development (horizontal mixed-use) and housing above ground-floor commercial uses (vertical mixed-use)</p>	<p>Consistent. Though the proposed project does not involve development itself, it would provide a framework for future development within the opportunity site. As illustrated by Figure 3-3, Opportunity Sites, many of the opportunity sites are located along the Lincoln Avenue corridor, and therefore within the LASP area. Because the corridor is already developed with various commercial uses, it is reasonable to assume that a portion of future residential developments would feature mixed-use development. Therefore, the proposed project would be consistent with Policy HOU-4.2 of the City’s General Plan.</p>
<p>Policy HOU-4.4: Ensure compatibility of new residential development with existing development to enhance the City’s residential neighborhoods.</p>	<p>Consistent. New residential development made possible by rezoning and changes to land use designations under the proposed project is unlikely to be incompatible with existing uses, as all new development is planned for areas already designated for residential or commercial development.¹ Additionally, Objective 4 of the proposed project, which can be found in Section 3.5 of Chapter 3.0, Project Description, of this PEIR, seeks to promote land uses that transform vacant or underutilized spaces. Therefore, the project aims to focus new residential development in infill projects that are adjacent to existing development. Future development on each of the opportunity sites would be subject to the architectural and design standards that are applicable to that part of the City, which would ensure aesthetic compatibility. Therefore, the proposed project would be consistent with Policy HOU-4.4 of the City’s General Plan.</p>
<p>Goal N-2: Incorporate noise considerations into land use planning decisions.</p>	<p>Consistent. Consistent with California Environmental Quality Act (CEQA) requirements, Section 4.6, Noise, of this PEIR, evaluates the potential short-term and long-term noise impacts associated with construction and operation of the proposed project. The proposed project was found to have less than significant environmental impacts, which may factor into planning decisions pertaining to the proposed project. Therefore, the proposed project would be consistent with Goal N-2 of the City’s General Plan.</p>
<p>Goal AQ-1: Reduce air pollution through proper land use and transportation planning.</p>	<p>Consistent. Objective 3 of the proposed project, which can be found in Section 3.5 of this PEIR, aims to implement sustainable planning and development practices by creating compact new developments and walkable neighborhoods to minimize the City’s contribution to greenhouse gas emissions (GHGs) and energy usage. The planning of potential residential sites directly adjacent to business and retail sites would eliminate the need for automobile travel in some cases. The walkable nature of many of the opportunity sites would contribute to the reduction of air pollution from automobile travel and would therefore make the project consistent with Goal AQ-1 of the City’s General Plan.</p>
<p>Goal GM-1: Reduce traffic congestion.</p>	<p>Consistent. As part of the environmental review process for the proposed project, a Level of Service (LOS) assessment pertaining to the project was conducted in May 2023. This assessment evaluated the potential circulation changes resulting from the implementation of the proposed project as required by the California Environmental Quality Act (CEQA). The assessment found that the proposed project would not result in any</p>



Table 4.5.B: General Plan Consistency Analysis

Relevant General Plan Goals/Policies	Consistency Analysis
	significant changes to LOS under General Plan build-out conditions. This, combined with the increased pedestrian accessibility that would result from the opportunity sites' proximity to existing land uses, could potentially function to reduce traffic congestion. Therefore, the proposed project would be consistent with Goal GM-1 of the City's General Plan.
<p>Policy GM-4.1: To the extent feasible, utilize information on the jobs/housing balance in the City and region as a factor in land use decision-making.</p>	<p>Consistent. As discussed in Section 4.7, Population and Housing, of this PEIR, SCAG's RHNA was developed using various data, including the City's projected population, household, and employment growth. Thus, the balance of jobs and housing is a built-in factor of the RHNA housing unit allocation provided by SCAG. Because the proposed project has been designed to accommodate the amount of housing units allocated to the City under its RHNA, the implementation of this update is inherently utilizing information on the jobs/housing balance in the City. Therefore, the proposed project would be consistent with Policy GM-4.1 of the City's General Plan.</p>

Source: City of Cypress General Plan (2000).

¹ City of Cypress. 2017a. 2021–2029 Cypress Housing Element Initial Study/Negative Declaration, Draft, SCH # 2021070352. July 2021.

² LSA. 2023. *Traffic Impact Analysis: City of Cypress Housing Element Implementation.*

CBPC Specific Plan = Cypress Business and Professional Center Specific Plan

City = City of Cypress

CTCC Specific Plan = Cypress Town Center and Commons Specific Plan

du/ac = dwelling units per acre

LOS = Level of Service

PEIR = Program Environmental Impact Report

RHNA = Regional Housing Needs Assessment

SCAG = Southern California Association of Governments

City of Cypress Zoning Ordinance. The proposed project includes amendments to the City's Zoning Ordinance that would allow for residential development, or in some cases denser residential development than was previously allowed, at the opportunity sites. The City's approval and implementation of amendments to the Zoning Code would ensure that the project would be consistent with the adopted 2021–2029 Housing Element. These updates would be codified in the City of Cypress Zoning Ordinance and Zoning Map. Future projects implemented in accordance with the updated zoning would be reviewed against provisions of the Zoning Ordinance, as well as in accordance with the CEQA guidelines, as part of the future development review process. Based on the foregoing, the project would have a less than significant impact with respect to a conflict with the City of Cypress' Zoning Ordinance.

Cypress Business and Professional Center (CBPC) Specific Plan. The proposed project divides the City's RHNA between the LASP area, the CTCC Specific Plan area, and the CBPC Specific Plan area.

The CBPC Specific Plan area currently restricts residential uses to Senior Housing. Under the proposed project, the Professional Office/Hotel and Support Commercial designation would be amended to allow residential densities of up to 60 du/ac, which would accommodate an estimated 321 units.



Table 4.5.C provides a consistency analysis of the policy from the CBPC Specific Plan that is relevant to the proposed project.

Table 4.5.C: CBPC Specific Plan Consistency Analysis

Relevant Specific Plan Policies	Consistency Analysis
Development Plan	
Overall Concept Policy 1: Encourage primarily employment generating business park and other commercial uses in the Specific Plan area, while expanding the diversity of housing by providing multifamily housing in Planning Area 5B, and senior housing and related “continuum of care” facilities in Planning Area 9.	Consistent. While the proposed project encourages residential development rather than business park or commercial uses, the provision of additional housing at a variety of income levels could encourage the development of business and commercial uses by locating potential workforce and consumer base concentrations near commercial centers. Therefore, the proposed project would be consistent with Overall Concept Policy 1 of the CBPC Specific Plan.

Source: Amended and Restated Cypress Business and Professional Center Specific Plan (City of Cypress 2012).
CBPC Specific Plan = Cypress Business and Professional Center Specific Plan

Table 4.5.D provides a consistency analysis of the policies from the LASP that are relevant to the proposed project.

Table 4.5.D: Lincoln Avenue Specific Plan Consistency Analysis

Relevant Specific Plan Policies	Consistency Analysis
Development Plan	
Goal 1: Enhance the economic vitality of the Lincoln Avenue Corridor.	Consistent. By amending the LASP to allow higher density residential uses along Lincoln Avenue, the proposed project could potentially improve the economic vitality of the Lincoln Avenue Corridor by increasing the existing consumer base with new residents in close proximity. Given the proximity of the proposed Lincoln Avenue opportunity sites to existing retail locations, residents would be able to walk to many businesses. Therefore, the proposed project would be consistent with Goal 1 of the LASP.
Policy 1.5: Locate residential uses within close proximity of commercial centers to encourage pedestrian traffic, and to provide a consumer base for commercial uses.	Consistent. Under the proposed project, residential areas of up to 30 du/ac would be located directly adjacent to commercial uses. This proximity would encourage pedestrian traffic between residential and commercial uses. Additionally, the new residential developments would potentially provide a new consumer base with convenient access to commercial uses. Therefore, the proposed project would be consistent with Policy 1.5 of the LASP.

Source: Lincoln Avenue Specific Plan (City of Cypress 1998).
CBPC Specific Plan = Cypress Business and Professional Center Specific Plan
CTCC Specific Plan = Cypress Town Center and Commons Specific Plan
du/ac = dwelling units per acre

Cypress Town Center and Commons (CTCC) Specific Plan. The allowable residential densities within the (1) the eastern portion of the Residential District; (2) the southern half of the Mixed-Use (Town-Center/SFR/MDR) District; (3) Town-Center District; and (4) the northern half of the Mixed-Use (Town Center/MDR) District of the CTCC Specific Plan opportunity sites would be



rezoned through an amendment to the CTCC Specific Plan to allow for the development of up to 30 dwelling units per acre (du/ac), which would allow the accommodation of a maximum of 676 additional residential units.

Additionally, the existing unit cap would be revised to allow development within these districts up to a total of 1,791 residential units within the CTCC Specific Plan area.

The City would be required to hold an election to implement changes to the CTCC Specific Plan. Because no specific goals or policies are laid out in the CTCC Specific Plan, this section does not contain a consistency table for the CTCC Specific Plan.

Lincoln Avenue Specific Plan (LASP). The current LASP allows for residential development at 30 du/ac within its R-30 and Residential Mixed Use districts. Under the proposed project, this maximum allowable density of 30 du/ac would be expanded beyond these districts to the majority of the LASP area. This change would increase development potential by approximately 1,317 units, allowing the LASP area to accommodate a total of approximately 1,644 units.

Summary. As described in Chapter 3.0, Project Description, the proposed project would include rezoning of sites to allow higher densities than are allowed under current designations, and would amend the General Plan, Zoning Ordinances, and the Specific Plans as needed to align with this change and other aspects of the updated 2021–2029 City General Plan Housing Element. Therefore, as described in Tables 4.5.A through 4.5.D, existing land use policies that are not already consistent with the proposed project would be amended accordingly, eliminating any possible land use conflicts.

With adoption of the Housing Element Update and the necessary conforming changes to land use designations, zoning, and Specific Plans, the project would create consistency between the 2021–2029 General Plan Housing Element Update and applicable City land use and planning policies. Additionally, any future projects implemented in accordance with the proposed zoning changes would be reviewed against applicable land use policies as a part of the future development review process. Therefore, the proposed project would result in less than significant impacts related to potential conflicts with applicable land use plans, policies, and regulations, and no mitigation is required.

4.5.6 Level of Significance Prior to Mitigation

The proposed project would result in less than significant impacts related to land use and planning.

4.5.7 Regulatory Compliance Measures and Mitigation Measures

No regulatory compliance measures or mitigation measures are applicable to the proposed project pertaining to land use and planning.

4.5.8 Level of Significance after Mitigation

No mitigation is required. The proposed project would not result in potentially significant impacts related to land use and planning.



4.5.9 Cumulative Impacts

As defined in the *State CEQA Guidelines*, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and reasonably foreseeable projects within the cumulative impact area for land use and planning. The geographic scope of the cumulative land use and planning analysis is the City of Cypress because the proposed project would affect land use and planning throughout the City. This cumulative impact analysis considers development of the proposed project in conjunction with other development projects and planned development within the City.

As discussed under Threshold 4.5.1, the project would not physically divide an established community because land use changes proposed within the City are intended to tie into the existing uses and surrounding neighborhoods. Development would occur within existing areas of development, which is not expected to divide an established community. Therefore, the project would have a less than cumulatively considerable impact with respect to the physical division of an established community.

As discussed under Threshold 4.5.2, the proposed project would not result in a significant impact with respect to consistency with the City's General Plan, Zoning Ordinance, or Specific Plans because the project would include necessary document amendments to ensure consistency. These changes would not have cumulative impacts because they are administrative actions to properly reflect existing uses. Any future projects implemented in accordance with the proposed zoning changes and updated land use designations would be required to adhere to all applicable development policies and guidelines.

As discussed in Chapter 4.0, Existing Setting, Environmental Analysis, Impacts, and Mitigation Measures, the list of projects considered for cumulative impacts is based upon the City's General Plan 2045 build-out assumptions. Because this build out is already anticipated and accounted for in the City's General Plan, no land use and planning conflicts would occur. As such, implementation of the City of Cypress Housing Element Update would not contribute to a cumulative effect due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Consequently, the cumulative impact would be less than significant.



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4.6 NOISE

This section evaluates the potential short-term and long-term noise impacts associated with the construction and operation of the 2021–2029 Cypress Housing Element Implementation Project (proposed project). This section is based in part on information provided in the Noise Element of the City of Cypress’ (City) General Plan. The assumptions used in the noise analysis and the noise modeling results are provided in Appendix E of this Draft Program Environmental Impact Report (PEIR).

4.6.1 Methodology

4.6.1.1 Characteristics of Sound

Noise is usually defined as “unwanted sound.” Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm, or when it has adverse effects on health.

To the human ear, sound has two important characteristics: pitch and loudness. Pitch is generally an annoyance, while loudness can affect the ability to hear. Pitch is the number of complete vibrations, or cycles per second, of a wave resulting in the tone’s range from high to low. Loudness is the strength of a sound that describes a noisy or quiet environment and is measured by the amplitude of the sound wave. Loudness is determined by the intensity of the sound waves combined with the reception characteristics of the human ear. Sound intensity is the average rate of sound energy transmitted through a unit area perpendicular to the direction in which the sound waves are traveling. This characteristic of sound can be precisely measured with instruments. In analyzing the potential noise impacts of a proposed project, the existing noise environment in the vicinity of the project site is identified and the potential noise effects of the project are evaluated in terms of sound intensity and the effect on adjacent sensitive land uses.

4.6.1.2 Measurement of Sound

Sound intensity is measured through the A-weighted decibel (dBA) scale to correct for the relative frequency response of the human ear. That is, an A-weighted noise level de-emphasizes low and very high frequencies of sound similar to the human ear’s de-emphasis of these frequencies. Decibels (dB), unlike the linear scale (e.g., inches or pounds), is a scale based on powers of 10.

Each interval of 10 dB indicates a sound energy 10 times greater than before. For example, 10 dB is 10 times more intense than 0 dB, 20 dB is 100 times more intense than 0 dB, and 30 dB is 1,000 times more intense than 0 dB. Thirty (30 dB) dB represents 1,000 times as much acoustic energy as 0 dB. The decibel scale increases as the square of the change, representing the sound pressure energy. A sound as soft as human breathing is about 10 times greater than 0 dB. The decibel system of measuring sound gives a rough connection between the physical intensity of sound and its perceived loudness to the human ear. A 10 dB increase in sound level is perceived by the human ear as a doubling of the loudness of the sound. Ambient sounds generally range from 30 dB (very quiet) to 100 dB (very loud).

Sound levels are generated from a source, and their decibel level decreases as the distance from that source increases. Sound dissipates exponentially with distance from the noise source. For a single point source, sound levels decrease approximately 6 dB for each doubling of distance from



the source. This drop-off rate is applicable to noise generated by stationary equipment. If noise is produced by a line source (which approximates the effect of several point sources), such as highway traffic or railroad operations, the sound decreases 3 dB for each doubling of distance in a hard site environment. Line source sound levels decrease 4.5 dB for each doubling of distance in a relatively flat environment with absorptive vegetation.

There are many ways to rate noise for various time periods, but an appropriate rating of ambient noise affecting humans also account for the annoying effects of sound. The equivalent continuous sound level (L_{eq}) is the total sound energy of time-varying noise over a sample period. However, the predominant rating scales for communities in the State of California are the L_{eq} and Community Noise Equivalent Level (CNEL) or the day-night average noise level (L_{dn}) based on A-weighted decibels. CNEL is the time-weighted average noise over a 24-hour period, with a 5 dBA weighting factor applied to the hourly L_{eq} for noises occurring from 7:00 p.m. to 10:00 p.m. (defined as relaxation hours) and a 10 dBA weighting factor applied to noises occurring from 10:00 p.m. to 7:00 a.m. (defined as sleeping hours). L_{dn} is similar to the CNEL scale but without the adjustment for events occurring during the relaxation. CNEL and L_{dn} are within 1 dBA of each other and are normally interchangeable.

Other noise rating scales used when assessing the annoyance factor of noise include the maximum noise level (L_{max}), which is the highest exponential time-averaged sound level that occurs during a stated time period. Short-term noise impacts are specified in terms of maximum levels denoted by L_{max} . L_{max} reflects peak operating conditions and addresses the annoying aspects of intermittent noise. For enforcement purposes, it is often used with another noise scale (or noise standards in terms of percentile noise levels) in noise ordinances. For example, the L_{10} noise level represents the noise level exceeded 10 percent of the time during a stated period. The L_{50} noise level represents the median noise level. Half the time the noise level exceeds this level, and half the time it is less than this level. The L_{90} noise level represents the noise level exceeded 90 percent of the time and is considered the background noise level during a monitoring period.

4.6.1.3 Vibration

According to the United States Department of Transportation (USDOT) FTA's 2018 *Transit Noise and Vibration Impact Assessment Manual*¹, vibration is the periodic oscillation of a medium or object. The rumbling sound caused by the vibration of room surfaces is called structure-borne noise. Sources of ground-borne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or anthropogenic causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous, such as factory machinery, or transient, such as explosions. As is the case with airborne sound, ground-borne vibrations may be described by amplitude and frequency. Vibration is often described in units of velocity (inches per second) and discussed in decibel units in order to compress the range of numbers required to describe vibration. Vibration impacts are generally associated with activities such as train operations, construction, and heavy truck movements.

¹ Federal Transit Administration (FTA). 2018. *Transit Noise and Vibration Impact Assessment Manual*. Website: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf (accessed July 24, 2023).



The background vibration velocity level in residential areas is generally 50 vibration velocity decibels (VdB). Ground-borne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration is rarely perceptible. The relevant range of vibration for the purposes of this analysis is from approximately 50 VdB, the typical background vibration velocity level, to 100 VdB, the general threshold where minor damage can occur in buildings.

4.6.2 Existing Environmental Setting

4.6.2.1 Overview of the Existing Noise Environment

The City of Cypress is located in the northwestern portion of the County of Orange, California. The City is bordered on the north by the cities of La Palma and Buena Park, on the east by the cities of Anaheim and Stanton, on the south and west by the city of Los Alamitos, and on the west by the cities of Long Beach, Hawaiian Gardens, and Lakewood. The City is predominantly developed with residential and commercial uses and community facilities and has little opportunity for additional development.

The existing noise environment can be characterized by major and minor arterial roadways, aircraft overflights (from the Joint Forces Training Base (JFTB) Los Alamitos), and industrial and commercial centers. Traffic noise on surface streets is a significant source of noise within the community. The major roadways in the City include Crescent Avenue, Lincoln Avenue, Orange Avenue, Ball Road, Cerritos Avenue, Katella Avenue, Orangetown Avenue, Bloomfield Street, Denni Street, Moody Street, Walker Street, Valley View Street, Holder Street, and Knott Street. JFTB Los Alamitos is situated along the southern boundary of the City and is the only airport in the vicinity of Cypress. Commercial and industrial land uses located near residential areas currently generate occasional noise impacts. The primary noise sources associated with these facilities is caused by delivery trucks, air compressors, generators, outdoor loudspeakers, and gas venting. Other significant stationary noise sources in the City include noise from construction activity, street sweepers, and gas powered leaf blowers.

4.6.2.2 Existing Sensitive Land Uses in the Project Vicinity

Certain land uses are considered more sensitive to noise than others. Examples of these land uses include residential areas, places of worship, educational facilities, childcare facilities, and recreational facilities. These land uses occur throughout various locations in the City and, in many cases, adjacent to the major roadways which comprise the primary circulation network.

Housing is the most predominant and noise-sensitive land use in Cypress. This land use is considered especially noise-sensitive because (1) considerable time is spent by individuals at home, (2) significant activities occur outdoors, and (3) sleep disturbance is most likely to occur in a residential area. Mixed use developments which include residential uses along major arterials are particularly sensitive uses since they are located in areas where higher noise levels are generated. Additionally, the City of Cypress has a number of educational facilities, churches, a library, senior housing, and park and recreation facilities that are considered noise-sensitive.



4.6.2.3 Existing Noise Levels

The major noise sources in the City of Cypress include freeways, major and minor arterial roadways, and noise-generating stationary sources. The most significant and common source of noise in urban areas is transportation related. Motor vehicle noise is of concern because of the traffic volume and roadway proximity to noise sensitive areas. Existing traffic noise levels were modeled at 50 feet from the centerline of the nearest lane. The lowest existing noise level recorded was 61 dBA on Holder Street between Orange Avenue and Katella Avenue and the highest was 70.3 dBA on Valley View Street between Katella Avenue and Oranewood Avenue.

4.6.3 Regulatory Setting

4.6.3.1 Federal Regulations

United States Noise Control Act. In 1972, Congress enacted the United States Noise Control Act. This act authorized the United States Environmental Protection Agency (USEPA) to publish descriptive data on the effects of noise and establish levels of sound “requisite to protect the public welfare with an adequate margin of safety.” These levels are separated into health (hearing loss levels) and welfare (annoyance levels). For protection against hearing loss, 96 percent of the population would be protected if sound levels are less than or equal to 70 dBA during a 24-hour period of time. At 55 dBA L_{dn} , 95 percent sentence clarity (intelligibility) may be expected at 11 feet (ft), with no community reaction. However, 1 percent of the population may complain about noise at this level and 17 percent may indicate annoyance. The USEPA cautions that these identified levels are guidelines, not standards.

4.6.3.2 State Regulations

Noise Insulation Standard. The State of California’s noise insulation standards are codified in the California Code of Regulations, Title 24, Building Standards Administrative Code, Part 2, and the California Building Code. These noise standards are applied to new construction in California for the purpose of controlling interior noise levels resulting from exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residential buildings, schools, or hospitals, are developed near major transportation noise sources, and where such noise sources create an exterior noise level of 60 dBA CNEL or higher. Acoustical studies that accompany building plans for noise-sensitive land uses must demonstrate that the structure has been designed to limit interior noise in habitable rooms to acceptable noise levels. For new residential buildings, schools, and hospitals, the acceptable interior noise limit for new construction is 45 dBA CNEL.

California Health and Safety Code, Division 28, Noise Control Act. The California Noise Control Act states that excessive noise is a serious hazard to public health and welfare and that it is the policy of the State to provide an environment for all Californians that is free from noise that jeopardizes their health or welfare. The goal is to minimize the number of people that would be exposed to excessive noise but not create an environment completely free from any noise.

State of California General Plan Guidelines. The State of California regulates vehicular and freeway noise affecting classrooms, sets standards for sound transmission and occupational noise control, and identifies noise insulation standards and airport noise/land-use compatibility criteria. The State



of California Governor’s Office of Planning and Research (OPR) 2017 *General Plan Guidelines* (OPR 2017), also provide guidance for the acceptability of projects within specific CNEL/L_{dn} contours. The General Plan Guidelines present adjustment factors that may be used in order to arrive at noise acceptability standards that reflect the noise control goals of the community, the particular community’s sensitivity to noise, and the community’s assessment of the relative importance of noise pollution.

4.6.3.3 Regional Regulations

There are no regional regulations related to noise that are applicable to the proposed project.

4.6.3.4 Local Regulations

City of Cypress General Plan. The development of effective strategies to reduce impacts of excessive noise is an essential part of the land use planning process. Since 1971, the Noise Element has been one of the seven mandatory elements of a General Plan. The Noise Element requires that noise sources be considered in establishing land use patterns so as to minimize exposure of residents to excessive noise. The Noise Element of the City’s General Plan² works to achieve and maintain environmental noise levels compatible with land use by establishing goals, policies, and programs to ensure that Cypress residents will be protected from excessive noise. The City’s Noise Element serves as a guideline for compliance with the State’s noise insulation standards. Applicable Noise Element objectives and policies include the following:

- **N-1:** Reduce noise impacts from transportation sources.
- **N-2:** Incorporate noise considerations into land use planning decisions.
- **N-3:** Minimize noise spillover from commercial uses into nearby residential neighborhoods.
- **N-4:** Minimize the noise impacts associated with the development of residential units above ground floor commercial uses in mixed use developments.

Additionally, the City’s General Plan Noise Element has established interior and exterior noise standards for various land use categories shown in Table 4.6.A. As shown in Table 4.6.A, the City’s exterior and interior noise standards are 50–60 dBA CNEL and 45–55 dBA CNEL, respectively, for single- and multifamily residences. It should be noted that the City’s exterior noise standard only applies to private yards of single-family residences, private patios, or balconies of multifamily residences which are served by a means of exit from inside the dwelling, mobile home parks, park picnic areas, and school playgrounds. Multifamily residences with balconies that are 6 feet deep or less are exempt from the City’s exterior noise standard. Although the City’s interior noise standard is 45–55 dBA CNEL, the interior noise standard of 45 dBA CNEL was used for a conservative noise analysis.

² City of Cypress. 2001. *City of Cypress General Plan Noise Element*. Website: <https://www.cypressca.org/home/showpublisheddocument/718/636123119313270000> (accessed June 3, 2023).



Table 4.6.A: City of Cypress Interior and Exterior Noise Standards

Categories	Land Use Categories	dBA CNEL	
	Uses	Interior ¹	Exterior ²
Residential	Single Family Duplex, Multiple Family	45 ³ –55	50–60
	Mobile Home	45	65 ⁴
Commercial Industrial	Hotel, Motel, Transient Lodging	45	--
	Commercial Retail, Bank, Restaurant	55	--
	Office Building, Research and Development, Professional Offices, City Office Building	50	--
	Amphitheater, Concert Hall Auditorium, Meeting Hall	45	--
	Gymnasium (Multipurpose)	50	--
	Sports Club	55	--
	Manufacturing, Warehousing, Wholesale, Utilities	65	--
	Movie Theaters	45	--
Institutional	Hospital, Schools' Classrooms	45	65
	Church, Library	45	--
Open Space	Parks	--	65

Source: City of Cypress General Plan Noise Element, Table N-3.

¹ Indoor environmental including: bedrooms, living areas, bathrooms, toilets, closets, corridors.

² Outdoor environments limited to: private yards of single-family residences, private patios, or balconies of multifamily residences which are served by a means of exit from inside the dwelling (balconies 6 ft deep or less are exempt), mobile home parks, park picnic areas, and school playgrounds.

³ Noise level requirement with closed windows. Mechanical ventilation system or other means of natural ventilation shall be provided as of Chapter 12, Section 1205 of the Uniform Building Code.

⁴ Exterior noise levels should be such that interior noise levels will not exceed 45 dBA CNEL.

Although the City has not adopted exterior noise standards for hotels, movie theaters, and commercial uses, the City has established an interior noise standard of 45 dBA CNEL for hotels and movie theaters and an interior noise standard of 55 dBA CNEL for commercial retail and restaurant uses.

4.6.4 Thresholds of Significance

The thresholds for noise impacts used in this analysis are consistent with Appendix G of the *State CEQA Guidelines* and the City's *Initial Study/Environmental Checklist*. The proposed project may be deemed to have a significant impact with respect to noise if it would:

Threshold 4.6.1: 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.

Threshold 4.6.2: Generation of excessive ground-borne vibration or ground-borne noise levels.

Threshold 4.6.3: For a project located within the vicinity of a private airstrip or on airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public airport, would the project expose people residing or working in the project area to excessive noise levels?



Section 4.13, Noise, of the Initial Study (Appendix A) prepared for the proposed project concluded that the project site is not within the 60 A-weighted decibel community noise equivalent level (dBA CNEL) or 65 dBA CNEL noise contours for JFTB Los Alamitos and therefore would result in less than significant impact related to airport and airstrip operational noise levels. Therefore, Threshold 4.6.3 is not further addressed below.

4.6.5 Project Impacts

Threshold 4.6.1: **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.**

Less Than Significant Impact. Implementation of the City of Cypress' 2021–2029 Housing Element update and rezoning program would alter existing development patterns and increase residential density. These activities could result in the potential demolition of structures, construction, and site grading, the location of residential uses near stationary noise sources, as well as increased traffic generation. All these activities have the potential to increase ambient noise and vibration levels within the City of Cypress and to exceed acceptable noise standards.

Many of the opportunity sites are adjacent to primary noise sources within the City (major roadways). The provision of additional housing units could result in noise-sensitive land uses being located within or adjacent to noise contours above 60 CNEL. However, any new construction would need to be consistent with the General Plan Noise Element.

Long-Term Traffic Noise Impacts. Future year average daily trips (ADT) were calculated by LSA for future year 2045 with and without the project for roadways within the City that were identified as major noise sources in Section 4.6.2.1. The potential change in ADT with and without the project ranged from a decrease of 530 ADT to an increase of 1,000 ADT. The largest increases (1,000 ADT) are predicted on Lincoln Avenue between Moody Street and Walker Street. Table 4.6.B provides a comparison of the future year 2045 ADT with and without the project and the resultant noise level change.

A 3 dBA increase is considered to be perceptible by the human ear in an outdoor environment. Therefore, the significance criteria define a significant impact to occur if the project would result in a substantial (3 dBA or greater) permanent increase in ambient noise levels in the project vicinity above levels existing without the project.

Potential sources causing a permanent increase in ambient noise include noise resulting from increased traffic on roadways within the City. It is projected that traffic volumes on some streets within the City would increase and some would decrease due to the proposed land use changes. The significance criteria define a significant impact to occur if the project would result in a substantial (3 dBA or greater) permanent increase in ambient noise levels in the project vicinity above levels without the project. For traffic noise to increase by 3 dBA, traffic volumes would have to double. It is assumed that the vehicle mix would remain the same. As shown in Tables 4.6.B, the anticipated change in traffic volumes associated with the proposed project would result in traffic noise increases



Table 4.6.B: Traffic Noise Levels Without and With Proposed Project

Roadway	Segment	Existing		Future Year (2045) Without Project		Future Year (2045) With Project		
		ADT	CNEL (dBA) 50 feet from Centerline of Nearest Lane	ADT	CNEL (dBA) 50 feet from Centerline of Nearest Lane	ADT	CNEL (dBA) 50 feet from Centerline of Nearest Lane	Increase from Existing Conditions
Lincoln Avenue	Bloomfield Street to Denni Street	18,660	66.2	26,480	67.7	26,920	67.7	0.0
	Denni Street to Moody Street	16,890	65.7	25,400	67.5	25,960	67.6	0.1
	Moody Street to Walker Street	16,240	65.5	25,180	67.5	26,180	67.6	0.1
	Walker Street to Valley View Street	18,310	66.1	26,370	67.7	27,300	67.8	0.1
	Valley View Street to Knott Avenue	17,310	65.8	25,660	67.5	26,310	67.6	0.1
Orange Avenue	Bloomfield Street to Moody Street	7,480	62.5	8,570	63.1	8,790	63.2	0.1
	Moody Street to Walker Street	10,500	63.9	11,420	64.3	11,810	64.5	0.2
	Walker Street to Valley View Street	11,880	64.5	13,350	65.0	13,750	65.1	0.1
	Valley View Street to Holder Street	11,920	64.5	12,910	64.8	13,060	64.9	0.1
	Holder Street to Knott Avenue	8,680	63.1	10,360	63.9	10,390	63.9	0.0
Ball Road	Bloomfield Street to Moody Street	17,300	66.8	19,330	67.3	19,380	67.3	0.0
	Moody Street to Walker Street	17,010	66.8	18,620	67.2	18,730	67.2	0.0
	Walker Street to Valley View Street	19,130	67.3	20,930	67.7	21,300	67.7	0.0
	Valley View Street to Knott Avenue	17,000	66.8	18,390	67.1	18,690	67.2	0.1
Cerritos Avenue	Bloomfield Street to Denni Street	19,640	66.1	21,760	66.6	21,660	66.5	-0.1
	Denni Street to Moody Street	20,170	66.2	21,970	66.6	21,960	66.6	0.0
	Moody Street to Walker Street	22,250	66.7	23,620	66.9	23,770	66.9	0.0
	Walker Street to Valley View Street	21,060	66.4	22,660	66.7	22,760	66.8	0.1
	Valley View Street to Knott Avenue	15,640	65.1	16,350	65.3	16,480	65.3	0.0
Katella Avenue	Bloomfield Street to Valley View Street	35,510	68.4	43,410	69.3	44,180	69.4	0.1
	Valley View Street to Knott Avenue	25,180	66.9	33,760	68.2	33,810	68.2	0.0
Orangewood Avenue	Valley View Street to Knott Avenue	7,930	62.7	8,440	63.0	8,470	63.0	0.0



Table 4.6.B: Traffic Noise Levels Without and With Proposed Project

Roadway	Segment	Existing		Future Year (2045) Without Project		Future Year (2045) With Project		
		ADT	CNEL (dBA) 50 feet from Centerline of Nearest Lane	ADT	CNEL (dBA) 50 feet from Centerline of Nearest Lane	ADT	CNEL (dBA) 50 feet from Centerline of Nearest Lane	Increase from Existing Conditions
Bloomfield Street	Lincoln Avenue to Ball Road	18,880	66.5	20,790	66.9	20,650	66.9	0.0
	Ball Road to Cerritos Avenue	17,210	66.1	18,480	66.4	18,530	66.4	0.0
	Cerritos Avenue to Katella Avenue	10,790	64.1	11,740	64.4	11,670	64.4	0.0
Denni Street	Lincoln Avenue to Cerritos Avenue	5,520	61.1	7,030	62.2	7,080	62.2	0.0
Moody Street	Lincoln Avenue to Orange Avenue	15,170	65.5	17,520	66.2	17,960	66.3	0.1
	Orange Avenue to Ball Road	12,290	64.6	13,840	65.1	14,060	65.2	0.1
	Ball Road to Cerritos Avenue	9,470	63.5	10,660	64.0	10,130	63.8	-0.2
Walker Street	Lincoln Avenue to Orange Avenue	15,690	67.0	16,610	67.2	16,630	67.2	0.0
	Orange Avenue to Ball Road	17,000	67.3	18,110	67.6	18,340	67.6	0.0
	Ball Road to Cerritos Avenue	15,090	66.8	15,900	67.0	16,290	67.1	0.1
	Cerritos Avenue to Katella Avenue	17,210	67.4	18,230	67.6	18,560	67.7	0.1
Valley View Street	Lincoln Avenue to Orange Avenue	33,520	69.2	35,270	69.5	35,510	69.5	0.0
	Orange Avenue to Ball Road	34,220	69.3	36,320	69.6	36,610	69.6	0.0
	Ball Road to Cerritos Avenue	34,780	69.4	37,120	69.7	37,210	69.7	0.0
	Cerritos Avenue to Katella Avenue	35,270	69.5	38,970	69.9	39,230	69.9	0.0
	Katella Avenue to Orangetown Avenue	42,870	70.3	44,570	70.5	44,810	70.5	0.0
Holder Street	Lincoln Avenue to Orange Avenue	6,030	62.2	10,430	64.6	10,550	64.6	0.0
	Orange Avenue to Katella Avenue	4,570	61.0	12,170	65.2	12,370	65.3	0.1
Knott Avenue	Lincoln Avenue to Katella Avenue	20,840	66.6	23,590	67.2	23,700	67.2	0.0
	Katella Avenue to Orangetown Avenue	22,290	66.9	22,990	67.1	23,060	67.1	0.0

Source: Compiled by LSA (June 2023).

Note: Traffic noise within 50 feet of the roadway centerline should be evaluated with site-specific information.

ADT = average daily traffic

CNEL= Community Noise Equivalent Level

dBA = A-weighted decibels



of up to 0.2 dBA, which is considered less than the threshold of perceptibility for humans (i.e., 3 dBA). Therefore, traffic noise regulated under the proposed project would not be readily perceptible in a suburban outdoor environment. Therefore, implementation of the proposed project would not allow the exposure of persons to noise levels in excess of applicable standards, and impacts would be less than significant. No mitigation would be required.

Threshold 4.6.2: Generation of excessive ground-borne vibration or ground-borne noise levels.

Less Than Significant Impact. The proposed project would allow for the development of 1,946 additional housing units (504 of which have already been entitled) on the opportunity sites and would not generate vibration. In addition, vibration levels generated from project-related traffic on the adjacent roadways would be highly unusual for on-road vehicles because the rubber tires and suspension systems of on-road vehicles provide vibration isolation. Therefore, vibration generated by project-related traffic on the adjacent roadways would be less than significant. No mitigation measures are required.

4.6.6 Level of Significance Prior to Mitigation

The proposed project would not result in potentially significant impacts related to noise. The proposed project would not directly result in physical development, and through compliance with the City's General Plan, noise impacts related to future residential dwelling units would be less than significant.

4.6.7 Regulatory Compliance Measures and Mitigation Measures

No regulatory compliance measures or mitigation measures are applicable to the proposed project pertaining to noise.

4.6.8 Level of Significance after Mitigation

The proposed project would not result in potentially significant impacts related to noise, and mitigation measures are not required.

4.6.9 Cumulative Impacts

As defined in the *State CEQA Guidelines*, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and reasonably foreseeable projects within the cumulative impact area for noise. The impact area used to assess potential cumulative impacts is Cypress because the proposed project would affect sensitive receptors within Cypress.

The proposed project would not directly result in physical development. Additionally, the updates to these plans are proposed to accurately reflect existing uses and not generate additional traffic nor additional noise. Any future projects implemented in accordance with the proposed rezoning and updated land use designations would be required to adhere to the General Plan Noise Element and comply with applicable development regulations. Therefore, the impacts from the proposed project are not considered to be cumulatively considerable.



4.7 POPULATION AND HOUSING

This section describes the existing population and housing characteristics in both the City of Cypress (City) and Orange County (County) and evaluates the potential impacts of the Cypress Housing Element Implementation Project (proposed project) on population and housing growth. This section is based on sources of demographic information provided by various agencies, including the Southern California Association of Governments (SCAG), the Cypress General Plan’s Housing Element (2021–2029), the California Department of Finance, and the United States Census Bureau.

4.7.1 Methodology

City and County demographic information was used to describe the existing population and housing characteristics in the City and County. SCAG projections for these topics were identified for the existing conditions and project build-out. City goals and policies regarding population and housing were used to evaluate potential impacts that could result from implementation of the proposed project.

4.7.2 Existing Environmental Setting

4.7.2.1 Population and Housing Trends in the City and County

The City of Cypress is characterized by urban areas, including single-family and multi-family residential uses and concentrations of retail, office, and industrial uses.

SCAG, the regional planning agency for the six-county Southern California region that includes Los Angeles, Orange, Riverside, San Bernardino, Ventura, and Imperial Counties, is responsible for preparing a regional growth forecast in conjunction with its efforts to prepare a Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) for its regional planning area. In September 2020, SCAG adopted the 2020–2045 RTP/SCS (Connect SoCal). This update included population projections for the cities and counties within the planning area. As such, the Demographics and Growth Forecast from Connect SoCal¹ was used to understand the population growth expected for the City of Cypress and Orange County. The Connect SoCal Demographics and Growth Forecast was meant to provide a common foundation for regional and local planning, policymaking, and infrastructure provision within the SCAG region. These projections are used as a reference point for discussing population and housing growth throughout this section.

The growth forecast for the City and County in the Connect SoCal Demographics and Growth Forecast is provided below in Table 4.7.A.

4.7.2.2 Population

As shown in Table 4.7.A, according to the Connect SoCal Demographics and Growth Forecast, the City’s population is estimated to grow by 3.4 percent between 2016 and 2045. The County was estimated to experience a higher population growth rate, increasing 11.2 percent between 2016 and 2045.

¹ Southern California Association of Governments (SCAG). 2020. *SCAG Connect SoCal Current Context, Demographics and Growth Forecast Technical Report*. September 3.



Table 4.7.A: Connect SoCal Population and Housing Forecasts (2016–2045)

	2016 (Actual)	2045 (Estimate)	2016–2045 Increase	% Change 2016–2045
Total Population				
City of Cypress	49,600	51,300	1,700	3.4%
Orange County	3,180,000	3,535,000	355,000	11.2%
Total Households				
City of Cypress	15,800	16,600	800	5.1%
Orange County	1,025,000	1,154,000	129,000	12.6%

Source: Southern California Association of Governments (2020).

The total number of households in the City is anticipated to increase by 5.1 percent between 2016 and 2045, while the total number of households in the County is expected to grow by 12.6 percent between 2016 and 2045.

4.7.2.3 Age Characteristics

A city’s age distribution often shapes its housing demand, because different age groups prefer different types of housing. Table 4.7.B, below, provides a comparison of the City’s and County’s populations by age group using data from the 2021 American Community Survey (ACS) 5-year estimate. According to the ACS data, the City’s median age is 41.2 years, which is slightly higher than the County’s median age (38.5 years) based on the same data set.²

Table 4.7.B: City of Cypress and Orange County Age Characteristics (2021)

Age Group	City of Cypress		Orange County	
	Persons	Percentage	Persons	Percentage
Under 18 Years	12,161	24.2%	699,691	22.0%
18 to 24 Years	3,879	7.7%	286,042	9.0%
25 to 44 Years	11,984	23.8%	870,620	27.4%
45 to 64 Years	14,699	29.2%	854,155	26.8%
65 and Over	7,565	15.0%	472,415	14.8%
TOTAL	50,297	100%	3,182,923	100%
Median Age	41.2		38.5	

Source: American Community Survey 2021 5-Year Estimate Table S0101. United States Census Bureau (n.d.)

As shown in Table 4.7.B, the City has a higher percentage of residents under the age of 18 (24.2 percent, compared to 22.0 percent for the County), and a lower percentage of residents between 18 and 24 years (7.7 percent, compared to 9.0 percent for the County), than the County. The City also has a lower percentage of residents between 25 and 44 years (23.8 percent, compared to 27.4 percent for the County), and a higher percentage of residents between 45 and 64 years

² United States Census Bureau. 2023. American Community Survey 2012-2017 5-Year Estimate Table S0101. Website: <https://data.census.gov/table?t=Age+and+Sex&g=160XX00US0617750&tid=ACST5Y2021.S0101> (accessed May 11, 2023).



(29.2 percent, compared to 26.8 percent for the County), than the County. The City and County have similar proportions of residents over the age of 65 (15.0 percent and 14.8 percent, respectively).

Households. As shown in Table 4.7.A, the total number of households in the City is anticipated to increase by 5.1 percent between 2016 and 2045, while the total number of households in the County is expected to grow by approximately 12.6 percent between 2016 and 2045. By forecasting a greater percentage of household growth than population growth, the Connect SoCal Demographics and Growth Forecast³ projects a decrease in the average household size in both the City and the County in coming years.

4.7.3 Regulatory Setting

4.7.3.1 Federal Regulations

There are no federal regulations related to population and housing that are applicable to the proposed project.

4.7.3.2 State Regulations

There are no State regulations related to population and housing that are applicable to the proposed project.

4.7.3.3 Regional Regulations

Southern California Association of Governments. As the designated metropolitan planning organization (MPO)⁴ for the six-county subregion that includes Orange County, SCAG prepares several plans to address regional growth, including the RTP/SCS. The regional growth forecasts undertaken by SCAG are developed for three planning horizons: 2030, 2035, and 2045. SCAG is mandated by federal and State law to research and draw up plans for transportation, growth management, hazardous waste management, and a regional growth forecast that form the foundation for these plans and regional air quality plans developed by the South Coast Air Quality Management District (SCAQMD). SCAG prepares several plans to address regional growth, including the Regional Comprehensive Plan and Guide, Regional Housing Needs Assessment (RHNA), the RTP, the Regional Transportation Improvement Program, and the annual State of the Region reports to measure progress toward achieving regional planning goals and policies.

Regional Transportation Plan/Sustainable Communities Strategy. In September 2020, SCAG's Regional Council adopted the 2020–2045 RTP/SCS. The 2020–2045 RTP/SCS takes into account demographic and economic changes that have occurred since the adoption of the 2016–2040 RTP/SCS, including a declining birth rate, an aging population, and domestic outmigration. The RTP/SCS charts a course for closely integrating land use and transportation so that the region can

³ The Southern California Association of Governments forecasts “households” rather than housing units. As defined by the United States Census Bureau, “households” are equivalent to occupied housing units.

⁴ An MPO is a federally mandated and federally funded transportation policymaking organization that is made up of representatives from local government and governmental transportation authorities. In 1962, the United States Congress passed legislation that required the formation of an MPO for any urbanized area with a population greater than 50,000.



grow smartly and sustainably. The long-term vision will address regional transportation and land use challenges and opportunities.

The RTP/SCS includes:

- Visions, policies, and performance measures;
- Initiatives at the intersection of land use, transportation, and technology to close the gap and reach greenhouse gas reduction goals;
- A financial plan including available funding;
- Economic impact of the plan; and
- Benefits of the plan.

Regional Growth Forecast. The regional growth forecasts undertaken by SCAG are developed to project growth in employment, population, and households at the regional, county, jurisdictional, and sub-jurisdictional levels. SCAG adopted the Connect SoCal Demographics and Growth Forecasts in conjunction with its efforts to prepare and adopt the 2020–2045 RTP/SCS. The projected growth in population, household, and employment is the data relied upon during development of SCAG’s RTP, SCS, and the RHNA. Consistency with the growth forecast at the subregional level is one criterion that SCAG uses in exercising its federal mandate to review “regionally significant” development projects for conformity with regional plans.

Regional Housing Needs Assessment. State law (Government Code Section 65580 et seq.) requires cities and counties to plan for their fair share of projected housing construction needs in their region. Housing unit construction goals are set by the State Department of Housing and Community Development and allocated to cities through regional planning agencies such as SCAG. This is called the RHNA. Future housing need refers to the proportion of the region’s future housing needs allocated to a community. Each jurisdiction’s future housing need is calculated in terms of four factors: (1) the number of units needed to accommodate forecast global household growth; (2) the number of units needed to replace demolition due to attrition in the housing stock (i.e., fire damage, obsolescence, redevelopment, and conversion to non-housing uses); (3) maintenance of an ideal vacancy rate for a well-functioning housing market; and (4) an adjustment to avoid an overconcentration of lower-income households in any one jurisdiction.

The RHNA prepared by SCAG defines the housing unit construction goals for the region. The City’s fair share for the planning period between 2021 and 2029 (the last adopted RHNA period) was established by SCAG at 3,936 units. The RHNA target number was based on projected household growth and the resulting need for construction of additional housing units allocated over the 6th Cycle planning period from 2021–2029. This 3,936-unit target was divided into the following income groups according to median family income as shown in Table 4.7.C, below.



Table 4.7.C: City of Cypress Regional Housing Need Allocation (2021–2029)

Income Level	Percentage of Area MFI	No. of Units
Very Low	0–50%	1,150
Low	51–80%	657
Moderate	81–120%	623
Above Moderate	>120%	1,506
TOTAL		3,936

Source: City of Cypress 2021–2029 Housing Element, Table HOU-3. City of Cypress (2022).
MFI = median family income

4.7.3.4 Local Regulations

City of Cypress Housing Element. The Housing Element is required by California State law to be a component of every city’s General Plan because housing needs are recognized as a statewide concern. As such, the Housing Element of a jurisdiction’s General Plan is the only element that is subject to approval by the State. Pursuant to State law, the Housing Element must identify the City’s housing needs, the sites that can accommodate these needs, and the policies and programs to assure that the housing units necessary to meet these needs can be provided. The primary goal of the Housing Element is to provide a range of housing opportunities for all income groups.

The 2021–2029 Housing Element was adopted as a guide for housing within the City of Cypress. The Housing Element provides an indication of the need for housing in the community in terms of housing affordability, availability, adequacy, and accessibility. The Housing Element also provides a strategy to address housing needs and identifies a series of specific housing programs to meet community needs.

The Housing Element calls for the continuation of existing policies and programs to enable the City to meet future housing demands for all economic segments of the community that address housing quality and quantity, housing affordability and access, equal housing opportunities and natural resources, and energy efficiency and conservation, and identifies new programs in conformance with recent housing legislation for implementation during the 2021–2029 Housing Element cycle.

The goals of the Housing Element are to promote housing that helps to create safe, livable, and sustainable neighborhoods, facilitate the construction and provision of quality housing to meet the City’s diverse needs, create opportunities for affordable housing, particularly in vulnerable areas and in areas of opportunity, and promote equitable and accessible housing options and resources.

The 2021–2029 Housing Element does not propose or approve any specific development projects. The 2021–2029 Housing Element acknowledges and addresses recent State legislation regarding requirements for local density bonus programs, surplus lands, accessory dwelling unit streamlining, and removing local barriers to housing. It is not possible to predict which project in the City, if any, would qualify for density bonus programs. The 2021–2029 Housing Element includes a policy that requires that a rezoning program be undertaken during the early portion of the 6th Cycle Planning Period to ensure internal consistency between the various elements of the City’s General Plan and its Zoning Ordinance. In addition, the 2021–2029 Housing Element contains several programs that



require amendments to the City’s General Plan and Zoning Ordinance to ensure the provision of adequate and appropriate sites for future housing development to accommodate the City’s unmet housing needs. Future discretionary governmental approval of site-specific housing projects, including those proposing a density bonus component, will require review in accordance with the California Environmental Quality Act (CEQA) and, if applicable, the National Environmental Policy Act.

The proposed project would include an update to the City’s General Plan, Specific Plans and Zoning Code and is necessary to provide consistency with the 2021–2029 Housing Element.

4.7.4 Thresholds of Significance

The thresholds for population and housing impacts used in this analysis are consistent with Appendix G of the *State CEQA Guidelines* and the City’s *Initial Study/Environmental Checklist*. The proposed project may be deemed to have a significant impact with respect to population and housing if it would:

Threshold 4.7.1: 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)?

Threshold 4.7.2: Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

As discussed in Section 4.14 of the Initial Study prepared for the proposed project (Appendix A), the proposed project would result in less than significant impacts regarding the displacement of substantial numbers of existing people or housing (Threshold 4.7.2). Therefore, this topic is not further addressed below.

4.7.5 Project Impacts

Threshold 4.7.1: **Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

Less Than Significant Impact. As discussed above, the City’s housing need allocation for the planning period between 2021 and 2029 is 3,936 units.

The 2021–2029 Housing Element identifies several adequate sites that able to accommodate the development of up to 1,946 new housing units (504 of which have already been entitled), but the City has a large unaccommodated housing need of 1,990 units to meet its RHNA allocation of 3,936 units. The City identified a potential rezoning scenario in the 2021–2029 Housing Element which divides the City’s RHNA between the Cypress Town Center and Commons Specific Plan 2.0 (CTCC Specific Plan), the Cypress Business and Professional Center Specific Plan (CBPC Specific Plan) area, and the Lincoln Avenue Specific Plan area.



Under the proposed project, an estimated 676 additional residential units could be accommodated within the CTCC Specific Plan area. The proposed project also includes one opportunity site on Katella Avenue adjacent to the CTCC Specific Plan area (Site #115, 4955 Katella) in the CBPC Specific Plan area, which would accommodate an estimated 321 residential units. The remaining RHNA sites would be accommodated within the Lincoln Avenue Specific Plan, which would accommodate approximately 1,317 residential units.

Overall, the proposed project would accommodate an additional 2,314 housing units at the opportunity sites. In addition to the 1,946 units already accommodated under existing zoning within the City, the proposed project would increase the residential development capacity in the City to a total of 4,260 housing units.

According to the 2017 American Housing Survey, the average household size in structures that have 50 or more housing units (the highest housing density type evaluated in the American Housing Survey) in the Los Angeles-Long Beach-Anaheim Metropolitan Statistical Area was 1.99 persons. As previously discussed, although the specific number of units per structure under the future buildout scenario cannot be known at this time, the project would allow for higher density housing and would likely facilitate larger multi-family housing projects that would provide more housing units under a single roof than single-family homes or townhomes, which are typically built at lower densities than those allowed under the proposed project. Therefore, it is reasonable to assume that the majority of the future housing units that would be allowed by the proposed project would be in structures that would contain 50 or more units. As such, the 1.99 persons per household metric was deemed appropriate for use in the analysis.

As summarized in Chapter 3.0, Project Description, the implementation of the proposed project would allow for the development of up to 2,314 additional dwelling units under the 2021–2029 Housing Element with a corresponding net increase of approximately 4,605 persons.⁵

According to the 2020–2045 RTP/SCS population projections for the City, the population of the City in 2045 is expected to be 51,300 persons, increasing by 1,700 persons from the actual 2016 population of 49,600 persons. Implementation of the proposed project could result in population growth that would exceed the 2020 to 2045 growth forecast for the City. However, as discussed previously, the projected growth in population, household, and employment rates detailed in the 2020–2045 RTP/SCS comprise the data relied upon during development of SCAG’s RTP/SCS and the RHNA. The Growth Forecast prepared for the 2020–2045 RTP/SCS was developed prior to the establishment of the City’s RHNA allocation of 3,936 units for the 2021–2029 planning period and the projected population increase in the City was relied upon for development of the City’s RHNA allocation. Therefore, implementation of the proposed project would not increase the City’s population greater than that estimated in the 2020–2045 RTP/SCS population projections. Further, implementation of the proposed project would help meet the housing needs of the City as the region’s population increases.

Any future projects implemented in accordance with the proposed rezoning and updated land use designations would be required to adhere to the City’s General Plan, provide required development

⁵ 2,314 households x 1.99 persons per household = 4,605 persons



impact fees, and comply with applicable development regulations. Ultimately, as part of the development review process, all future projects would be required to demonstrate during the development review process that service providers would ensure adequate public services and utilities are available. Additionally, each of the opportunity sites is in urbanized settings with a full range of public services and utilities. Located on the Los Alamitos Race Course site, the majority of the CTCC Specific Plan area is currently occupied by the race course, a portion of the former Cypress Golf Course, and surface parking. In May 2021, the City approved the Cypress Town Center Project, which developed one of the former race course parking lots with a 135-unit multi-family residential community. The CTCC Specific Plan area also contains a 9-acre park, Lexington Park, in the northwest corner of the race course property. The Lincoln Avenue Specific Plan area is also fully developed, consisting of commercial and residential land uses, and the Katella Avenue opportunity site is developed with commercial uses. The primary building on the Katella Avenue site is a big-box type structure that accommodates two tenants. One half of the building is occupied by a gym and the other half of the building is currently vacant (formerly an Office Depot). Future residential uses would replace existing land uses and not induce additional growth or require the extension of roads or other infrastructure, because the roads and infrastructure are already in place with adequate capacity to serve the new development on the opportunity sites.

Although the proposed project would facilitate the development of new housing in the City, the new housing would not induce substantial unplanned population growth, as the proposed project is designed to meet the City’s housing need allocation for the planning period between 2021 and 2029 of 3,936 units as determined by the SCAG RHNA. As such, the proposed project is consistent with planned regional housing growth and planned population growth of the City as evaluated in the SCAG RHNA. In addition, the opportunity sites are in urbanized settings with a full range of public services and utilities. As such, the proposed project would not cause indirect substantial unplanned population growth through the extension of roads and other infrastructure. Impacts associated with unplanned population growth, directly or indirectly, would be less than significant, and no mitigation would be necessary.

4.7.6 Level of Significance Prior to Mitigation

The proposed project would result in less than significant impacts related to population and housing.

4.7.7 Regulatory Compliance Measures and Mitigation Measures

No regulatory compliance measures or mitigation measures are required.

4.7.8 Level of Significance after Mitigation

The proposed project would result in less than significant impacts related to population and housing.

4.7.9 Cumulative Impacts

The purpose of this section is to evaluate any additional incremental impact that the proposed project is likely to cause above and beyond the combined impacts of recently approved and proposed projects in the City of Cypress. The impact area used to assess potential cumulative



population and housing impacts is the City because the proposed project would affect population and housing within the City. As discussed in Chapter 4.0, Existing Setting, Environmental Analysis, Impacts, and Mitigation Measures, the cumulative impacts analysis is based upon the City's 2045 General Plan build-out assumptions.

The proposed project includes the approval of updates to the General Plan Land Use Element, the Lincoln Avenue Specific Plan, the CTCC Specific Plan, the CBPC Specific Plan, and the Zoning Ordinance to bring the General Plan and Zoning Ordinances into conformity with the City's recently adopted 2021–2029 Housing Element, thereby increasing the residential development capacity in the City to a total of 4,260 housing units. Future development allowed under the proposed project would accommodate planned regional housing growth included in the SCAG RHNA.

LSA developed the General Plan build-out assumptions by reviewing the land use assumptions in the eight Transportation Analysis Zones (TAZs) in the City where growth was anticipated due to potential growth as provided in the General Plan and or approved projects in a related planning document. The Orange County Transportation Analysis Model TAZs contained household data for 2016, which were updated to reflect the 2045 anticipated build out. Table 4.A, General Plan Cumulative Growth Assumptions, in Chapter 4.0, Existing Setting, Environmental Analysis, Impacts, and Mitigation Measures, indicates that the City expects build out of approximately 2,687 additional households within the Lincoln Avenue Specific Plan and the Race Track Super Block between 2016 and 2045 under the baseline General Plan build-out scenario. As such, implementation of the proposed project in conjunction with the build out of the households under the baseline General Plan build-out scenario could result in cumulatively significant population increases. However, future development allowed under the proposed project would accommodate planned regional housing growth included in the SCAG RHNA. In addition, future projects implemented in accordance with the proposed project, as well as the remaining development associated with the City's General Plan 2045 build-out assumptions, would be required to adhere to the General Plan, provide required development impact fees, and comply with applicable development regulations. Therefore, the impacts from the proposed project are not considered to be cumulatively considerable.



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4.8 PUBLIC SERVICES

This section describes the public services providers within whose jurisdiction the 2021-2029 Cypress Housing Element Implementation Project (proposed project) opportunity sites are located and evaluates the potential impacts of the proposed project on public services. This section is based on multiple data sources, including written correspondence and coordination with public service providers included as Appendix F of this Draft Program Environmental Impact Report (PEIR). This section addresses the following public services (service providers are noted in parentheses):

- Fire Protection—Orange County Fire Authority (OCFA)
- Police Protection—Cypress Police Department (CPD)
- Parks—City of Cypress Recreation and Community Services Department
- Public Libraries—Orange County Public Libraries (OCPL)
- Schools—Cypress School District (CSD) and Anaheim Union High School District (AUHSD)

4.8.1 Methodology

The CPD and OCFA were sent questionnaires requesting information on current police and fire protection service provided to the opportunity sites and possible constraints or impacts to this service associated with project build out (which is anticipated to occur in 2045). The impact analyses for police and fire protection services are based on responses to the questionnaires, data obtained through websites, and adopted planning documents of the service providers. Correspondence with public service providers is included in Appendix F.

Information on current parks, public library, and school services provided to the opportunity sites and possible constraints or impacts to this service associated with project build out was obtained through websites and adopted planning documents of service providers.

4.8.2 Existing Environmental Setting

4.8.2.1 Fire Protection

The OCFA is a joint powers authority responsible for reducing loss of life and property from fire, medical, and environmental emergencies. The OCFA is a regional fire service agency that serves 23 cities in Orange County (County) and all unincorporated areas in the County. Based in 77 fire stations throughout the County, OCFA protects more than 1,984,758 residents. In addition, OCFA Reserve Firefighters work 10 stations throughout the County.¹

In addition to providing fire suppression, emergency medical services, hazardous materials response, wildland firefighting, technical rescue, and airport rescue firefighting services, the OCFA provides a variety of public services, including the following:

- Receiving and dispatching emergency calls

¹ Orange County Fire Authority (OCFA). 2019a. *Member Cities*. Website: <https://www.ocfa.org/aboutus/PartnerCities.aspx> (accessed May 10, 2023).



- Providing public education programs to schools, businesses, community associations, childcare providers and other members of the community
- Administering a Reserve Firefighter Program
- Adopting and enforcing codes and ordinances relative to fire and life safety issues associated with commercial, industrial, and residential development
- Maintaining a firefighting helicopter used for emergency responses throughout the year
- Coordinating the inspection of all commercial buildings, investigating all fires, and enforcing hazardous materials regulations
- Working with developers and jurisdictional planning departments on development projects impacting fire protection services, from conception through planning process approval
- Conducting new construction inspections, fire safety inspections, and State Fire Marshal-required inspections (including high rise, jail, board and care, and day care inspections), and enforcing applicable fire codes and ordinances
- Interacting with developers, architects, and engineers to meet the fire protection requirements for buildings and developments by reviewing all architectural blue prints, development plans, and proposals submitted in OCFA's jurisdiction
- Conducting an inventory program of hazardous materials stored, handled, and used within OCFA's jurisdiction, and maintaining related information on a data base accessible to all emergency response agencies in the event of a major emergency
- Conducting California Fire Code inspections, assists in reducing risks associated with the use of hazardous materials in the community, and administering the State-mandated Risk Management and Prevention program
- Investigating fires to determine their cause, preparing arson and hazardous materials cases for the district attorney, and initiating actions to recover costs for negligently caused fires
- Developing and maintaining a fire-safe corridor between the wildland and community developments through fuel modifications and inspections

The City of Cypress is in Operations Division 7, which serves the cities of Buena Park, Cypress, La Palma, and Stanton along with portions of several unincorporated communities.²

² OCFA. 2019b. *Operations Directory*. Website: <https://www.ocfa.org/aboutus/Departments/OperationsDirectory/Division7.aspx> (accessed May 10, 2023).



There is one OCFA fire station in the City, Fire Station No. 17, at 4991 Cerritos Avenue. Fire Station No. 17 is in the southwest area of the City and would be the first to answer calls from the opportunity sites in the event of an emergency and would thus be designated as the “first-in” station. Fire Station No. 17 is staffed daily by 2 captains, 2 engineers, and 4 firefighter/paramedics, and has a total staffing of 6 captains, 6 engineers, and 12 firefighters. The station is also equipped with a fire truck, fire engine, and paramedic engine. Fire Station No. 17 was substantially rebuilt and expanded in 2012 with added capacity to accommodate the existing and future fire protection and paramedic needs in the service area and has the equipment to handle fires in five-story buildings. In 2022, the City generated 3,734 calls for service.³

“Second call” stations are fire stations that support the “first-in” station. Fire Station Nos. 46 and 84 would be designated as the “second call” stations to support Fire Station No. 17. Fire Station No. 46, located at 7871 Pacific Street in Stanton, is 3.1 miles east of the nearest opportunity site and is staffed daily by one captain, one fire apparatus engineer, and two firefighters, and has a total staffing of three captains, three engineers, and six firefighters. Fire Station No. 46 is equipped with a paramedic assessment unit engine and a medic engine. Fire Station No. 84, located at 12191 Valley View Street in Garden Grove, is approximately 2 miles southeast of the nearest opportunity site and is staffed daily by one captain, one fire apparatus engineer, two firefighters, and has a total staffing of three captains, three engineers, and six firefighters. Fire Station No. 84 is equipped with a medic engine and an engine.

Incident information for Fire Station Nos. 17, 46, and 84 from 2022 is provided in Table 4.8.A below.

Table 4.8.A: Incident Information for Fire Station Nos. 17, 46, and 84 (2022)

Call Type	Fire Station No. 17	Fire Station No. 46	Fire Station No. 84
Fires	26	105	16
EMS	1,617	3,000	1,407
Ruptures	0	6	2
Hazardous Conditions	12	24	12
Service Call	116	173	169
Good Intent	231	423	142
False Alarms	122	73	43
Miscellaneous	0	2	0
TOTAL	2,178	3,806	1,791

Source: Personal communication with OCFA (June 2023).

EMS = emergency medical services

OCFA = Orange County Fire Authority

According to the City’s General Plan Safety Element, it is the OCFA’s goal to have the first responding company for a fire call to reach emergency scene within 8 minutes and paramedics to reach the scene within 5 minutes at least 90 percent of the time. Over the last 9 years, the average response time for emergency calls remained relatively constant until Fiscal Year 2020–2021, in which average response time decreased due to reduced traffic from the COVID-19 pandemic. From Fiscal Year 2020–2021 to Fiscal Year 2021–2022, the average response time increased from 5 minutes and

³ OCFA. 2022b. *OCFA 2022 Statistical Annual Report*.



53 seconds to 6 minutes and 29 seconds as normal traffic patterns resumed. However, the average response time for Fiscal Year 2021–2022 has improved compared to Fiscal Year 2019–2020.⁴ For Fiscal Year 2021–2022, 80 percent of emergency calls were responded to within 8 minutes and 16 seconds and 90 percent of calls were responded to within 9 minutes and 54 seconds.⁵ The number of firefighters per 10,000 residents has remained steady over the last three fiscal years, ranging from 5.86 to 5.94 firefighters.⁶

4.8.2.2 Police Protection

The CPD would serve the opportunity sites. Management and supervision of the CPD is provided by 1 chief, 2 captains, 2 lieutenants, 10 sergeants, and a civilian supervisor. Of the CPD's 55 sworn personnel, 41 are dedicated to the delivery of patrol services. In addition to the 55 officers, the department is supported by 23 civilian employees and numerous volunteers.⁷ The officer-to-resident ratio in 2022 was 1.1 CPD officer per 1,000 residents.

The services provided by the department include a detective bureau, canine teams, a narcotics team, vice and intelligence, motorcycle officers, Personnel & Training, Positive Actions through Character Education (P.A.C.E.) program, S.W.A.T. and a Lead Patrol Officer program. In addition, the CPD has established Community Policing, or Cypress Policing, as the philosophy for providing public safety services.⁸

Police dispatch services for the City of Cypress are provided by the West Cities Police Communications Center, also known as West-Comm. West-Comm is a consolidated police dispatch center, formed by a joint powers authority between the cities of Cypress, Los Alamitos, and Seal Beach. Located at the Seal Beach Police Department, West-Comm serves a combined population of approximately 90,000 and handles approximately 100,000 calls for service each year.⁹

4.8.2.3 Parks

There are currently a total of 21 developed public parks within the City.¹⁰ The City's Municipal Code states a goal of providing 3.0 acres of land per 1,000 residents for park and recreational purposes, and an additional 1.5 acres of land per 1,000 residents for purposes that are made available at K–12 schools through a cooperative arrangement between the City, local school districts, and local park and recreation districts. As of July 2021, the City's population was 49,926.¹¹ According to the Conservation/Open Space/Recreation Element of the City's General Plan (2001), the City currently has 82 acres of parkland available for its 49,926 residents, providing approximately 1.6 acres of

⁴ OCFA. 2022a. *OCFA 2022-2023 Adopted Budget*.

⁵ Ibid.

⁶ Ibid.

⁷ City of Cypress. 2017. *Cypress Police Department Overview*. Website: <https://www.cypressca.org/departments/police/the-community-we-serve> (accessed May 11, 2023).

⁸ Ibid.

⁹ Ibid.

¹⁰ City of Cypress. 2023a. *Recreation and Community Services, Facility and Park Locations*. Website: <https://www.cypressca.org/activities/facility-park-locations> (accessed May 11, 2023).

¹¹ United States Census Bureau. 2023. *QuickFacts: Cypress City, California*. Website: <https://www.census.gov/quickfacts/fact/table/cypresscitycalifornia/PST045221#PST045221> (accessed May 11, 2023).



parkland per 1,000 residents. Since the adoption of the City’s General Plan, the City completed construction of the 2.9-acre Mackay Park at the former Mackay School site¹² and added 9 acres of park space at the corner of Lexington Drive and Cerritos Avenue with the development of Lexington Park.¹³ These recent additions increased park space in the City to 93.9 acres and changed the parkland-to-resident ratio to 1.9 acres of parkland per 1,000 residents.

4.8.2.4 Public Libraries

The OCPL system provides library services to the County, including the City. OCPL operates 32 library branches across the County, including an outlet in the Orangewood Children’s Home.¹⁴ OCPL’s Mobile Library also provides library services to County residents who are unable to visit libraries due to transportation issues, lack of childcare, disabilities, and language or cultural barriers. In addition, OCPL offers free Books-by-Mail service.¹⁵ The Cypress Library is at 5331 Orange Avenue. The Cypress Branch Library consists of a 15,000-square-foot facility with numerous resources and services available to the public including an AWE station¹⁶, book clubs, bookstore, internet hotspots, laptop and charger kiosk, children’s play area, computers, wi-fi, wireless printing, volunteer opportunities, world language collections, and special collections of sheet music, local history, and board games.¹⁷ The branch is open Saturday through Thursday and is closed on Fridays.

According to the Public Services and Facilities Element of the Orange County General Plan (2012), the County’s standard for library service is 0.2 square feet of library space per capita. According to that service standard, the Cypress Branch Library has the capacity to accommodate a population of 75,000 persons. The Cypress Branch Library currently exceeds the County’s standards for size since the City’s population estimate as of July 2021 is 49,926. It should also be noted that, according to the Public Services and Facilities Element of the Orange County General Plan, the 0.2 square feet of library space per capita standard has been accepted by the Orange County Board of Supervisors as a planning guide for the purpose of projecting the number and location of new libraries needed.

According to OCPL’s annual report for 2022–2023, OCPL has been working to improve library branches across the County through upgrades to heating, ventilation, and air conditioning systems; roofs; alarm systems; building automation systems; accessibility; electrical and cabling infrastructure updates; and lighting to meet Title 24 requirements. These upgrades would work to increase efficiencies and contribute to a positive patron experience; however, it should be noted that the completed and proposed upgrades do not include the expansion of any library facilities.

¹² City of Cypress. 2023c. *Recreation and Community Services, MacKay Park*. Website: <https://www.cypressca.org/Home/Components/FacilityDirectory/FacilityDirectory/66/240> (accessed July 27, 2023).

¹³ City of Cypress. 2023b. *Recreation and Community Services, Lexington Park*. Website: <https://www.cypressca.org/activities/lexington-park-rental> (accessed May 11, 2023).

¹⁴ Orange County Public Libraries (OCPL). 2023a. About OCPL. Website: <https://www.ocpl.org/services/about-ocpl> (accessed July 27, 2023).

¹⁵ OCPL. 2023b. *OC Public Libraries Annual Report 2023*.

¹⁶ The AWE station provides a computer for children ages 2–8 years that is equipped with a variety of education games in English and Spanish.

¹⁷ OCPL. n.d. *Cypress Library, Resources and Services*. Website: <https://www.ocpl.org/libraries/cypress> (accessed July 27, 2023).



4.8.2.5 Public Schools

The City is served by several public school districts. Although the City is within the boundaries of three elementary school districts, which serve kindergarten through sixth grade students (the Cypress, Centralia, and Savanna Elementary School Districts), most of the City is in the Cypress School District. The southeast portion of the City is also in the Garden Grove Unified School District. The provision of education and school facilities in the City is primarily the responsibility of the CSD, which serves the City’s kindergarten through sixth-grade students, and AUHSD, which serves the City’s junior high and high school districts (grades 7 through 12).

The CSD currently operates six elementary schools; five are in Cypress and one is in La Palma. The CSD’s 2022–2023 enrollment was 3,389. In addition, all of the CSD’s schools offer on-site privately owned and operated childcare and preschool services. The AUHSD encompasses 46 square miles and has schools in Anaheim, Cypress, Buena Park, La Palma, and Stanton. The AUHSD currently operates 8 junior high schools, 9 high schools, Cambridge Virtual Academy, Hope School, and Oxford Academy. The AUHSD’s 2022–2023 enrollment was 27,748.

The majority of the opportunity sites along Lincoln Avenue are within the CSD; however, a few of the opportunity sites east of Valley View Street are within the Centralia Elementary School District (CESD). The CESD is composed of eight elementary schools and the district’s 2022–2023 enrollment was 4,129 students. The Lincoln Avenue opportunity sites within the CESD are within the San Marino Elementary school attendance area, located at 6215 San Rolando Way in Buena Park.

The majority of the opportunity sites are also within the AUHSD, with a small portion of the Cypress Town Center and Commons Specific Plan 2.0 (CTCC Specific Plan) opportunity sites located within the Los Alamitos Unified School District (LAUSD), which serves kindergarten through twelfth-grade students. LAUSD currently operates six elementary schools, one middle school, and one high school, and the 2022–2023 enrollment was 8,934 students.

None of the opportunity sites are within the boundaries of the Savanna Elementary School District or the Garden Grove Unified School District. Figure 4.8-1, School Districts, illustrates the boundaries of the aforementioned school districts and the locations of the opportunity sites.

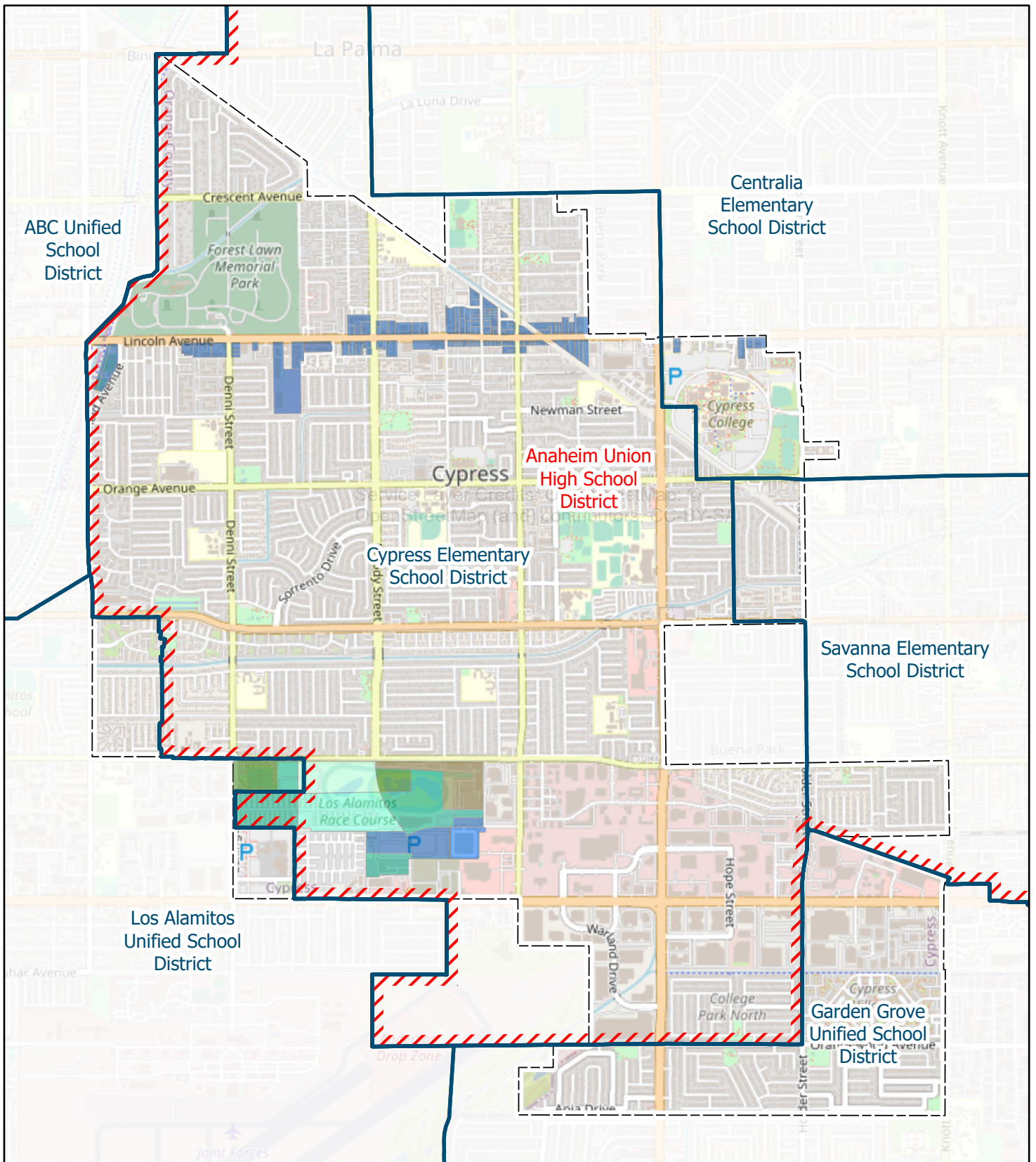
4.8.3 Regulatory Setting

4.8.3.1 Federal Regulations

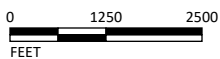
There are no federal policies related to public services applicable to the proposed project.

4.8.3.2 State Regulations

Assembly Bills 2926, 1600, and 2751. To assist in providing facilities to serve students generated from new development projects, the State enacted Assembly Bill (AB) 2926 in 1986, which allows school districts to collect impact fees from developers of new residential, commercial, and industrial developments. Development impact fees are also referenced in the 1987 Leroy Greene Lease-Purchase Act, which requires school districts to contribute a matching share of the costs for the



LSA



SOURCE: Esri Basemap (2022)

City Boundary

Proposed Density

- 8 units/acre
- 10 units/acre
- 15 units/acre
- 18 units/acre
- 30 units/acre

Public Park

SCGC

School District Boundaries

- Anaheim Union High School District
- Other Districts

2021–2029 Cypress Housing Element Implementation Project
School Districts

FIGURE 4.8-1



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construction, modernization, or reconstruction of school facilities. Subsequent legislation has modified the fee structure and general guidelines. In 1987, the provisions of AB 2926 have been expanded and revised by AB 1600, which limits the ability of a school district to levy school fees unless (i) there is a need for the school fee revenues generated, and (ii) there is a nexus or relationship between the need for school fee revenues and the type of development project on which the school fee is imposed. (The requirements of AB 1600 were clarified with the passage in 2006 of AB 2751, which codifies the findings of *Shapell Industries vs. Milpitas Unified School District*.)

Senate Bill 50 and California Education Code Section 17620. Senate Bill 50 and California Education Code Section 17620. Senate Bill (SB) 50, the Leroy F. Greene School Facilities Act of 1998, was signed into law on August 27, 1998. It is a program for funding school facilities largely based on matching funds. The approval of Proposition 1A authorized funds for SB 50 in the amount of \$9.2 billion, including grants for construction of new schools and modernization of existing schools. The new construction grant provides funding on a 50/50 State and local match basis. The modernization grant provides funding on a 60/40 State and local match basis. Districts that are unable to provide some or all of the local match requirements and are able to meet financial hardship provisions may be eligible for additional State funding.¹⁸ SB 50 (codified as California Education Code Section 17620) allows school districts to levy a fee, charge, dedication, or other requirement against any development project within its boundaries for the purpose of funding the construction or reconstruction of school facilities. The maximum fee amount that school districts can assess is limited by statutes provided in California Government Code Section 65995. The fees are collected by the AUHSD and shared equally with the appropriate elementary school district. In addition, LAUSD also levies a school facility/developer fee.¹⁹

The payment of these fees by a developer serves to mitigate all potential impacts on school facilities that may result from implementation of a project to levels that are less than significant (see California Government Code Section 65996). Stated another way, the provisions of SB 50 provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in the California Environmental Quality Act (CEQA) or other State or local laws. The California Department of Education permits local school districts to increase facility fees subject to Department of Education review and with approval of a nexus study from the school district that demonstrates that costs incurred by the school district for the provision of school facilities and services are higher than Level 1 funding provides. In such an instance, a nexus must be demonstrated in the study between the increase proposed by the local school district and the actual cost of provision of school facilities and services.

California Fire Code. The California Fire Code (CFC) includes regulations for emergency planning, fire service features, fire protection systems, hazardous materials, fire flow requirements, and fire hydrant locations and distribution. Several fire safety requirements include installation of sprinklers

¹⁸ State of California. 2007. *Office of Public School Construction, School Facility Program Handbook*. State Allocation Board. April.

¹⁹ Los Alamitos Unified School District. 2022. *School Facility/Developer Fees*. Website: <https://www.losal.org/departments/business-services/school-facilitydeveloper-fee-handbook#:~:text=Fees%20as%20of%20November%2021%2C%202022%3A%20Residential%3A%20%244.79,cad.%20Checks%20can%20be%20made%20payable%20to%20%22LAUSD%22> (accessed July 28, 2023).



in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildlife hazard areas.

Office of Emergency Services. The State of California passed legislation authorizing the Office of Emergency Services to prepare a Standard Emergency Management System program, which sets forth measures by which a jurisdiction should handle emergency disasters. Non-compliance with the Standard Emergency Management System could result in the State withholding disaster relief from the non-complying jurisdiction in the event of an emergency disaster.

4.8.3.3 Regional Regulations

There are no regional policies or regulations related to public services applicable to the proposed project.

4.8.3.4 Local Regulations

City of Cypress Municipal Code. The Cypress Municipal Code includes the following requirement that would apply to the proposed project related to the provision of public services:

- **Section 5-3 (California Fire Code, adoption, amendments)** adopts the 2019 CFC, with some amendments and modifications. Generally, the intent of the CFC is to prescribe regulations for the safeguarding of life and property from the hazard of fire and explosion.

4.8.4 Thresholds of Significance

The thresholds for public services impacts used in this analysis are consistent with Appendix G of the *State CEQA Guidelines* and the City's *Initial Study/Environmental Checklist*. The proposed project may be deemed to have a significant impact with respect to public services if it would:

Threshold 4.8.1(i): Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?

Threshold 4.8.1(ii): Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?

Threshold 4.8.1(iii): Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of



which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?

Threshold 4.8.1(iv): Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?

Threshold 4.8.1(v): Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?

As discussed in Section 4.15 of the Initial Study prepared for the proposed project (provided in Appendix A), the proposed project would result in less than significant impacts to park facilities (Threshold 4.8.1(iv)) and other public facilities (Threshold 4.8.1(v)). Therefore, these topics are not further addressed below.

4.8.5 Project Impacts

Threshold 4.8.1(i): **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?**

Less Than Significant Impact. The proposed project includes a programmatic update to the City's General Plan, the Lincoln Avenue Specific Plan (LASP), the Cypress Town Center and Commons Specific Plan 2.0 (CTCC Specific Plan), the Cypress Business and Professional Center Specific Plan (CBPC Specific Plan), and Zoning Ordinance to bring the General Plan and Zoning Ordinances into conformity with the City's recently adopted 2021–2029 Housing Element and would not directly result in physical development. Future housing projects at the opportunity sites would be subject to additional CEQA review related to specific development applications.

The City's housing needs allocation for the planning period between 2021 and 2029 was established by the Southern California Association of Governments (SCAG) at 3,936 units. The City identified a potential rezoning scenario in the 2021–2029 Housing Element which divides the City's Regional Housing Needs Assessment (RHNA) between the Cypress Town Center and Commons Specific Plan 2.0 (CTCC Specific Plan), the Cypress Business and Professional Center Specific Plan (CBPC Specific Plan) area, and the Lincoln Avenue Specific Plan (LASP) area. The proposed project would



accommodate an additional 2,314 housing units at the opportunity sites. In addition to the 1,946 units already accommodated under existing zoning within the City, the proposed project would increase the residential development capacity in the City to a total of 4,260 housing units. According to the 2017 American Housing Survey, the average household size in structures that have 50 or more housing units (the highest housing density type evaluated in the American Housing Survey) in the Los Angeles-Long Beach-Anaheim Metropolitan Statistical Area was 1.99 persons. As such, the construction of up to 2,314 additional housing units under the proposed project would result in a net increase of approximately 4,605 persons. This increase in the City's population could result in an increase in fire protection calls within the City; however, such calls would be generally consistent with the types of calls the OFCA responds to at similar residential developments in the City. Additionally, each of the opportunity sites are either currently developed or surrounded by existing development and are in areas of the City already served by OCFA.

As discussed above, the OCFA currently serves more than 1,984,758 residents from its 77 fire stations throughout the County, including Fire Station No. 17 within the City and Fire Station Nos. 2 and 84 nearby. The addition of 4,605 residents would increase the population served by 0.2 percent. This increase in population served by OFCA is negligible (less than 1 percent and would not impact OCFA's ability to serve the City).

Any future housing projects implemented in accordance with the proposed project would be required to adhere to all OCFA requirements, including providing adequate fire flow/structure protection to the opportunity sites, hydrants spaced to meet the minimums identified in the fire code, and providing adequate access for emergency vehicles. Any future development projects would be required to obtain City approval of building plans prior to issuance of building permits and would be required to demonstrate during the development review process that fire service providers would be able to provide adequate fire protection through building design requirements and access. Further, all future projects implemented in accordance with the proposed project would be subject to additional CEQA review related to specific development applications. As detailed in Regulatory Compliance Measure (RCM) PS-1, below, during the development and CEQA review process, future projects would be required to coordinate with OCFA to determine the appropriate development impact fees required for the project to offset potential impact to OCFA staffing and service ability. Therefore, impacts on fire protection services would be less than significant, and no mitigation is required.

Threshold 4.8.1(ii): **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for *police protection*?**

Less Than Significant Impact. As discussed previously, implementation of the proposed project would facilitate the construction of 2,314 housing units, which is estimated to result in a net increase of 4,605 persons to the City's population. This increase in the City's population could result in an increase in calls to law enforcement within the City; however, such calls would be generally consistent with the types of calls the CPD responds to at similar residential developments in the City.



Additionally, each of the opportunity sites are surrounded by existing development and are in areas of the City already served by CPD.

CPD currently has 55 sworn personnel and in 2019, had an officer-to-resident ratio of 1 CPD officer per 1,000 residents. Since 2019, the officer-to-resident ratio has fluctuated around 1 CPD officer per 1,000 residents. In 2021, the City had a population of 49,926, increasing the officer-to-resident ratio to 1.1 CPD officer per 1,000 residents. The increase of 4,605 persons in the City as facilitated by the proposed project would result in an officer-to-resident ratio of 1 CPD officer per 1,000 residents, which is consistent with the officer-to-resident ratio of the City since 2019. Although the proposed project would likely result in an increase in calls to law enforcement within the City due to the population increase associated with the construction of 2,314 additional housing units, CPD has confirmed that it anticipates hiring additional officers to adequately serve future population growth in the City, including the population increase associated with the proposed project. In addition, CPD has confirmed that it has adequate facilities to accommodate additional officers.²⁰

Any future housing projects implemented in accordance with the proposed project would be required to adhere to all applicable policies and codes related to the provision of police services. Any future development projects would be required to obtain City approval of building plans prior to issuance of building permits and would be required to demonstrate during the development review process that law enforcement providers would be able to provide adequate police protection services. Future housing projects at the opportunity sites would be subject to additional CEQA review related to specific development applications. Therefore, impacts on police protection services would be less than significant, and no mitigation is required.

Threshold 4.8.1(iii): **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?**

Less Than Significant Impact. The California Office of Public-School Construction has published general student yield factors for elementary, secondary (middle/high school), and unified school districts in California (May 2009). The student generation rate for elementary schools is 0.5 student per dwelling unit and the student generation rate for middle/high school students is 0.2 student per dwelling unit. These student generation rates were used to estimate the number of students that could be generated within the boundaries of the LAUSD and AUHSD as a result of project implementation. According to the Residential and Commercial/Industrial Development School Fee Justification Study performed for the CSD by Cooperative Strategies and dated April 30, 2020, the elementary student generation rate for multi-family units (high density units) in the CSD is 0.255 student per unit.²¹ According to the Developer Fee Justification Study performed for the CESD by Cooperative Strategies and dated November 9, 2022, the elementary student generation rate for

²⁰ Personal communication with CPD Captain Chris Revere on July 6, 2023.

²¹ Cooperative Strategies. 2020. *Residential and Commercial/Industrial Development School Fee Justification Study, Cypress School District, Table 5: Adjusted Student Generation Factors*. April 30.



multi-family units (high density units) in the CESD is 0.32 student per unit.²² These student generation rates were used to estimate the number of students that could be generated within the boundaries of the CSD and the CESD as a result of project implementation. Implementation of the proposed project would result in 2,144 units in the CSD, 79 units in the CESD, 91 units in the LAUSD, and 2,144 units in the AUHSD. Based on the above generation factors, it is estimated that the 2,314 additional residential units allowed under the proposed project would result in 547 additional students in the CSD, 25 in the CESD, 64 students in the LAUSD (46 elementary school students and 18 middle/high school students), and 429 students in the AUHSD. (refer to Table 4.8.B).

Table 4.8.B: Projected School Enrollment

Grade Levels	Student Generation Factor	Projected Enrollment
Cypress School District (CSD)	0.255 student/unit	547 students
Centralia Elementary School District (CESD)	0.32 student/unit	25 students
Los Alamitos Unified School District (LAUSD) (Elementary School)	0.5 student/unit	46 students
Los Alamitos Unified School District (LAUSD) (Middle/High School)	0.2 student/unit	18 students
Anaheim Union High School District (AUHSD) (Middle/High School)	0.2 student/unit	429 students
Total	--	1,065 students

Sources: State of California, Office of Public School Construction (2019); Cooperative Strategies (2020, 2022).

The increase in students as a result of project implementation would increase the demand for school facilities. However, future development allowed under the proposed project would accommodate planned regional housing growth included in the SCAG RHNA, which is based on population estimates, including school-aged children, for the City. Therefore, although implementation of the proposed project would facilitate an increase in demand for school facilities, this increase in demand is consistent with the increase in the City’s population.

As previously discussed, AUHSD’s enrollment was 27,748 students in the 2022–2023 school year. As shown in Table 4.8.B above, development of residential units allowed under the proposed project would generate 429 new middle and high school level students. This represents a 1.5 percent increase to AUHSD’s student enrollment population. According to the AUHSD Facilities Master Plan Update, the AUHSD is experiencing an overall decline in enrollment of approximately 3,200 students through the 2025–2026 school year in the cities of Anaheim, Buena Park, Cypress, La Palma, and Stanton.²³ Pursuant to California Education Code Section 17620(a)(1), the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district for the purpose of funding the construction or reconstruction of school facilities. The Applicant/Developer of future residential development projects allowed under the proposed project would be required to pay such fees to reduce any

²² Cooperative Strategies. 2022. *Developer Fee Justification Study, Centralia Elementary School District*. November 9.

²³ Anaheim Union High School District (AUHSD). 2022. *Facilities Master Plan Update, 3.2 Planning Considerations; Enrollment Projections and Demographics*. February 16.



impacts of new residential development on school services as provided in Section 65995 of the California Government Code (refer to Regulatory Compliance Measure RCM PS-2 below). With the AUHSD's projected decline in enrollment, and with payment of development impact fees on a project-by-project basis, it is expected that AUHSD would have sufficient capacity to accommodate new middle and high school level students generated with implementation of the proposed project.

According to the Residential and Commercial/Industrial Development School Fee Justification Study completed for the CSD by Cooperative Strategies and dated April 30, 2020, the CSD had a facilities capacity of 4,400 students in the 2019–2020 school year.²⁴ As previously discussed, CSD's enrollment was 3,389 students in the 2022–2023 school year. As such, the CSD is operating under capacity and has an additional 1,011 seats available for new students. As shown in Table 4.8.B, above, the additional residential units allowed under the proposed project within the CSD boundary would generate 547 new elementary-level students. This increase in elementary level students can be accommodated by the CSD's available capacity. In addition, with implementation of RCM PS-1 as described above, it is expected that CSD would have sufficient capacity to accommodate new elementary level students generated by the additional housing units allowed under the proposed project. The fees would be collected by the AUHSD and shared equally with the CSD.

The CESD had been experiencing a decline in enrollment between the 2016–2017 school year and the 2020–2021 school year; however, since the 2020–2021 school year, the school district has registered a small increase in enrollment.²⁵ As shown in Table 4.8.B, above, the additional residential units allowed under the proposed project within the CESD boundary would generate approximately 25 new elementary level students. The Applicant/Developer of future residential development projects allowed under the proposed project would be required to pay such fees to reduce any impacts of new residential development on school services as provided in Regulatory Compliance Measure RCM PS-2). Although in recent years the CESD has experienced a slight increase in enrollment, because of the district's historic decline in enrollment, and with payment of development impact fees on a project-by-project basis, it is expected that CESD would have sufficient capacity to accommodate elementary school level students generated with implementation of the proposed project.

The LAUSD has been experiencing a decline in enrollment since the 2016–2017 school year.²⁶ As shown in Table 4.8.B above, the additional residential units allowed under the proposed project within the LAUSD boundary would generate 46 new elementary level students and 18 new middle/high school level students, for a total of 64 new students. This increase in students can be accommodated by the LAUSD. In addition, the Applicant/Developer of future residential development projects allowed under the proposed project would be required to pay such fees to

²⁴ Cooperative Strategies. 2020. *Residential and Commercial/Industrial Development School Fee Justification Study, Cypress School District*. April 30.

²⁵ California Department of Education. 2023a. *DataQuest, Enrollment Multi-Year Summary by Grade, Centralia Elementary Report (30-66472)*. Website: <https://dq.cde.ca.gov/dataquest/dqcensus/EnrGrdYears.aspx?cds=3066472&agglevel=district&year=2022-23&ro=y> (accessed July 28, 2023).

²⁶ California Department of Education. 2023b. *DataQuest, Enrollment Multi-Year Summary by Grade, Los Alamitos Unified Report (30-73924)*. Website: <https://dq.cde.ca.gov/dataquest/dqcensus/EnrGrdYears.aspx?cds=3073924&agglevel=district&year=2022-23&ro=y> (accessed July 28, 2023).



reduce any impacts of new residential development on school services as provided in Regulatory Compliance Measure RCM PS-2). With the LAUSD’s continued pattern of decline in enrollment, and with payment of development impact fees on a project-by-project basis, it is expected that LAUSD would have sufficient capacity to accommodate new students generated with implementation of the proposed project.

Pursuant to the provisions of Government Code Section 65996, a project’s impact on school facilities is fully mitigated through payment of the requisite school facility development fees current at the time a building permit is issued. Therefore, with payment of the required fees, as outlined in Regulatory Compliance Measure PS-2, potential impacts to school services and facilities associated with implementation of the proposed project would be less than significant. No mitigation is required.

4.8.6 Level of Significance Prior to Mitigation

Impacts related to police services, schools, parks, and libraries would be less than significant prior to mitigation. The proposed project would result in potentially significant impacts to fire protection services, and mitigation is required.

4.8.7 Regulatory Compliance Measures and Mitigation Measures

4.8.7.1 Regulatory Compliance Measures

The proposed project would comply with the following standards, the implementation of which is intended to reduce impacts related to public services.

Regulatory Compliance Measure PS-1

Any future projects implemented in accordance with the proposed project would be required to coordinate with the Orange County Fire Authority (OCFA) to determine the appropriate development impact fees required to offset potential impact to OCFA staffing and service ability. Prior to the approval of a future project implemented in accordance with the proposed project, the designated site developer shall enter into a Secured Fire Protection Agreement with OCFA that details the agreed-upon development impact fees required for the project.

Regulatory Compliance Measure PS-2

Payment of School Fees. Prior to issuance of any building permits, the Applicant/Developer of future residential development projects facilitated by the proposed project shall provide proof to the Director of the City of Cypress Community Development Department, or designee, that payment of school fees to the appropriate school districts have been made in compliance with Section 65995 of the California Government Code.



4.8.8 Level of Significance after Mitigation

With the implementation of Regulatory Compliance Measure RCM PS-1 and RCM PS-2, potentially significant impacts would be reduced below a level of significance.

4.8.9 Cumulative Impacts

The purpose of this section is to evaluate any additional incremental impact that the proposed project is likely to cause above and beyond the combined impacts of recently approved and proposed projects in the City of Cypress. The impact area used to assess potential cumulative population and housing impacts is the City because the proposed project would affect population and housing within the City. As discussed in Chapter 4.0, Existing Setting, Environmental Analysis, Impacts, and Mitigation Measures, the list of projects considered for cumulative impacts is based upon the City's General Plan 2045 build-out assumptions.

The proposed project would result in a negligible increase in population served by OFCA from the existing conditions, would not propose any new development that would require a substantial increase in police presence, and would also adhere to all applicable policies and codes related to the provision of firefighting and police services including OCFA requirements related to providing adequate fire flow/structure protection to the opportunity sites and providing adequate access for emergency vehicles. Future development allowed under the proposed project would accommodate planned regional housing growth included in the SCAG RHNA, which is based on population estimates including school-aged children, for the City. Therefore, although implementation of the proposed project would facilitate an increase in demand for school facilities, this increase in demand is consistent with the increase in the City's population. In addition, developers of future residential development projects allowed under the proposed project would be required to pay their fair share of school impact fees. Any population growth associated with the project that would lead to potential strains on public services would not be substantial because it would be located within an area capable of supporting it.

LSA developed the General Plan build-out assumptions by reviewing the land use assumptions in the eight Transportation Analysis Zones (TAZ) where growth was anticipated due to potential growth as provided in the General Plan and or approved projects in a related planning document. The Orange County Transportation Analysis Model TAZ contained household data for 2016, which was updated to reflect 2045 anticipated build out. Table 4.A, General Plan Cumulative Growth Assumptions, in Chapter 4.0, Existing Setting, Environmental Analysis, Impacts, and Mitigation Measures, indicates that the City expects build out of 2,687 additional households within the Lincoln Avenue Specific Plan and the Race Track Super Block between 2016 and 2045 under the baseline General Plan build-out scenario. As such, implementation of the proposed project in conjunction with the build out of the additional households could result in a cumulatively significant impact to public services within the City. However, developers of future residential development projects implemented in accordance with the proposed project, as well as the remaining development associated with the City's General Plan 2045 build-out assumptions, would be required to analyze potential impacts to public services and pay their fair share of development impact fees. Therefore, the impacts from the proposed project on public services are not considered to be cumulatively considerable.



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4.9 TRANSPORTATION

This section analyzes the existing and planned transportation and circulation conditions for the proposed Cypress Housing Element Implementation Project (proposed project) and the surrounding area, and identifies circulation impacts that may result subsequent to the development of the proposed project. The analysis contained in this section is based on the *Level of Service and Vehicle Miles Traveled Assessments for the City of Cypress Housing Element Implementation, Cypress, California* (LSA, May 2023), which is provided in Appendix G to this Environmental Impact Report (EIR).

4.9.1 Methodology

4.9.1.1 Level of Service

As discussed below in Section 4.9.3, Regulatory Setting, recent changes to the California Environmental Quality Act (CEQA) Guidelines eliminated the requirement for Level of Service (LOS) analysis in EIRs and other CEQA documents in favor of the Vehicle Miles Traveled (VMT) metric. However, the City of Cypress' General Plan Circulation Element includes a detailed LOS analysis of the City's existing operating conditions, and sets LOS capacity/operational standards for each class of roadway within the City. Therefore, an analysis of LOS is included in this section in order to achieve consistency with the City's General Plan.

The Orange County Transportation Analysis Model (OCTAM) was used in the development of forecasted traffic volumes for the LOS assessment. OCTAM socioeconomic data were consistent with the City's existing planning and zoning regulations. The City conducted a detailed housing development analysis to identify the potential dwelling unit capacities for each parcel identified as an opportunity site. Detailed parcel level capacities for the proposed project were included in "Appendix A – Sites Inventory" of the City's 2021–2029 Housing Element. Housing development capacities at the parcel level were used to develop and distribute household growth at a Traffic Analysis Zone (TAZ) for the OCTAM socioeconomic datasets.

Existing OCTAM assumptions regarding forecasted (2045) household growth in Cypress were reviewed to confirm that they reflect the City's existing planning and zoning regulations. Given that OCTAM assumed that the entire City would experience a total household growth of 930 units from 2016–2045, which is substantially lower than the City's 2021–2029 Regional Housing Needs Assessment (RHNA) goal of 3,936 dwelling units. The following steps were used to develop cumulative datasets for the model:

- The City provided detailed data about recent and ongoing housing developments, which were used to refine the forecasted household growth. Entitled dwelling units are those dwelling units that were approved from June 2020 through June 2021. The 2021–2029 Housing Element included information about the number of dwelling units by location, which was used to add the entitled units to OCTAM TAZs.
- Similarly, the City has identified control totals on the number of dwelling units for each of the areas of the City/Specific Plans to meet the RHNA requirements. Parcel-specific housing



development capacities were used to proportionally distribute the household growth by area to OCTAM TAZs.

- Given the evaluation was conducted at the City level, no TAZ splits were made. Household characteristics from OCTAM TAZs were applied to the anticipated dwelling unit growth under the proposed project to develop OCTAM inputs.
- No, roadway/transit network modifications were made to the 2045 OCTAM network.

Development of Year 2045 Traffic Volumes. The following details the methodology employed for passenger vehicles to determine the a.m. and p.m. peak hour intersection turn movements for General Plan Build out (2045) conditions. Volume development sheets are included in Appendix G, Level of Service and Vehicle Miles Traveled Assessment, of this Draft Program EIR (PEIR).¹ OCTAM was used in this process. The base year for the passenger vehicle model is 2016 and the future year, as established by OCTAM, is 2045. It should be noted that OCTAM’s use of 2045 as the future year buildout scenario is consistent with the end year used in the Southern California Association of Governments’ (SCAG) 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (collectively called Connect SoCal).

1. The difference between the modeled base year 2016 and future year 2045 peak-period directional arterial traffic volumes (for each intersection approach and departure) was identified from loaded network model plots. This difference defines the growth in traffic from 2016 base conditions to future year 2045 conditions.
2. The incremental growth in peak period approach and departure volumes was factored to develop the incremental change in peak-hour volumes. OCTAM uses a 3-hour a.m. peak period and a four-hour p.m. peak period. The Orange County Transportation Authority has established that the a.m. peak hour comprises 35.66 percent of the peak period and that the p.m. peak hour comprises 26.62 percent of the peak period. Therefore, the incremental changes in peak period volumes were multiplied by the appropriate factors to develop incremental changes in peak-hour volumes.
3. The incremental growth in approach and departure volumes between 2016 and 2045 was factored to reflect the forecasted growth between the year of the ground counts (2022) and the analysis year of 2045. For this purpose, linear growth between the 2016 base condition and the 2045 future condition was assumed. Since the increment between 2022 and 2045 is 23 years of the 29-year time span, a factor of 0.79 (i.e., 23/29) was used.
4. The forecasted growth in approach and departure volumes through year 2045 conditions was added to the 2022 ground counts, resulting in “post-processed” forecasted year 2045 link volumes.
5. Forecast year 2045 turn volumes were developed using existing turn volumes and the forecasted growth in approach and departure link volumes.

¹ LSA. 2023. *Level of Service and Vehicle Miles Traveled Assessments*.



Study Area Intersection Locations. The following 26 signalized intersections were selected for LOS assessment in consultation with City staff. Figure 4.9-1, Study Area Intersections, depicts the intersections (20 intersections in Cypress and 6 intersections in both Cypress and Los Alamitos).

1. Lincoln Avenue and Bloomfield Street (Cypress)
2. Lincoln Avenue and Lexington Drive-Denni Street (Cypress)
3. Lincoln Avenue and Moody Street (Cypress)
4. Lincoln Avenue and Walker Street (Cypress)
5. Lincoln Avenue and Valley View Street (Cypress)
6. Orange Avenue and Moody Street (Cypress)
7. Orange Avenue and Walker Street (Cypress)
8. Orange Avenue and Valley View Street (Cypress)
9. Orange Avenue and Holder Street (Cypress)
10. Ball Road and Bloomfield Street (Cypress/Los Alamitos)
11. Ball Road and Moody Street (Cypress)
12. Ball Road and Walker Street (Cypress)
13. Ball Road and Valley View Street (Cypress)
14. Cerritos Avenue and Bloomfield Street (Cypress/Los Alamitos)
15. Cerritos Avenue and Lexington Drive-Denni Street (Cypress/Los Alamitos)
16. Cerritos Avenue and Moody Street (Cypress)
17. Cerritos Avenue and Walker Street (Cypress)
18. Cerritos Avenue and Valley View Street (Cypress)
19. Katella Avenue and Lexington Drive (Cypress/Los Alamitos)
20. Katella Avenue and Siboney Street-Race Course (Cypress/Los Alamitos)
21. Katella Avenue and Walker Street (Cypress/Los Alamitos)
22. Katella Avenue and Valley View Street (Cypress)
23. Katella Avenue and Holder Street (Cypress)
24. Katella Avenue and Knott Avenue (Cypress)
25. Oranewood Avenue and Valley View Street (Cypress)
26. Oranewood Avenue and Knott Avenue (Cypress)

Intersection Level of Service Methodologies. In accordance with the City's Circulation Element, signalized intersection operation was analyzed using the Intersection Capacity Utilization (ICU) methodology. The ICU methodology compares the volume-to-capacity (v/c) ratios of conflicting turn movements at an intersection, sums up these critical conflicting v/c ratios for each intersection approach, and determines the overall ICU. The ICU calculations assume a per-lane capacity of 1,700 vehicles per hour with a clearance interval of 0.05.



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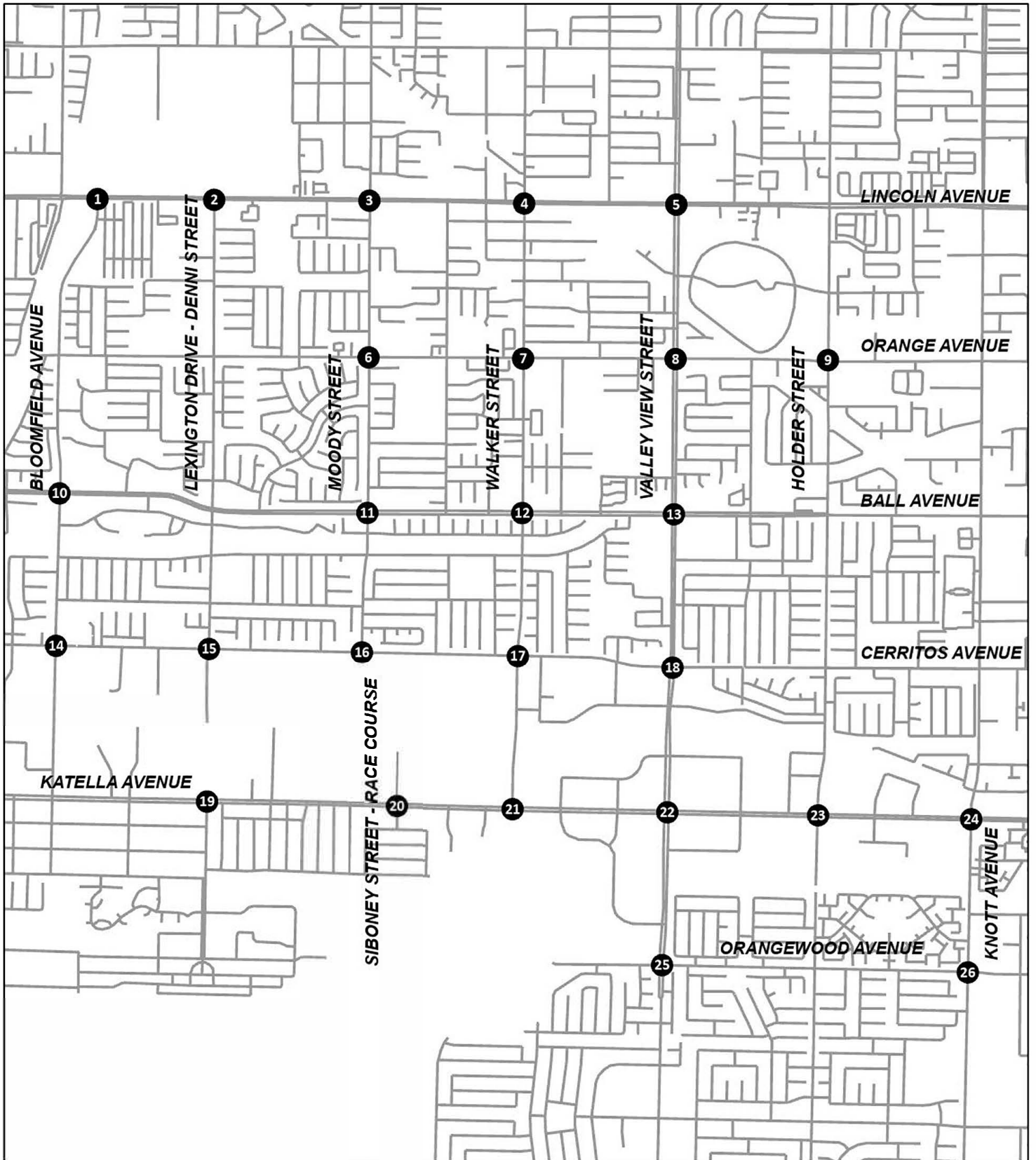
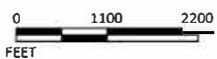


FIGURE 4.9-1

LSA

LEGEND

● Study Intersections



SOURCE: Google Imagery (2020)

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The resulting ICU is expressed in terms of level of service (LOS), where LOS A represents free-flow operation and LOS F represents overcapacity operation. The relationship between LOS and the ICU value (i.e., v/c ratio) is shown in Table 4.9.A.

Table 4.9.A: Relationship Between LOS and ICU Values

Level of Service	Volume-to-Capacity (ICU Methodology)
A	≤ 0.60
B	> 0.60 and ≤ 0.70
C	> 0.70 and ≤ 0.80
D	> 0.80 and ≤ 0.90
E	> 0.90 and ≤ 1.00
F	> 1.00

ICU = Intersection Capacity Utilization
LOS = level of service

Thresholds of Significance. Though not required, this PEIR evaluates LOS for the sake of consistency with the City’s General Plan. According to the General Plan, the City considers LOS D as the upper limit of satisfactory operations for intersections, except at intersections along Valley View Street, Lincoln Avenue, and Katella Avenue. The City has adopted LOS E or better as the standard for intersections along these three arterials, as they carry a significant amount of traffic. Also, Valley View Street and Katella Avenue are designated in the Orange County Congestion Management Program (CMP) as CMP facilities, and intersections along these roadways have an operational standard of LOS E or better.

The City of Los Alamitos considers LOS D as the upper limit of satisfactory operations for intersections, except at intersections along Katella Avenue, where LOS E is acceptable.

Based on City of Cypress and City of Los Alamitos standards, an operational deficiency occurs at an intersection if a project causes an intersection operating at an acceptable LOS to deteriorate to an unacceptable LOS, or if an intersection is already operating at an unacceptable LOS and the project would add 0.01 or more to the peak-hour ICU.

4.9.1.2 Vehicle Miles Traveled

On December 28, 2018, the California Office of Administrative Law cleared the revised CEQA Guidelines for use. Among the changes to the *State CEQA Guidelines* was the removal of vehicle delay and LOS from consideration under CEQA. With the adopted guidelines, transportation impacts are to be evaluated based on a project’s effect on VMT.

The City has yet to adopt the Senate Bill 743 guidelines; therefore, the VMT analysis has been based upon the methodology and significance threshold criteria identified in the *Final Draft Guidelines For Evaluating Vehicle Miles Traveled Under CEQA for the County of Orange*, dated September 17, 2020 (Guidelines).²

² County of Orange. 2020. *Final Draft Guidelines For Evaluating Vehicle Miles Traveled Under CEQA for the County of Orange*, dated September 17, 2020.



The project is an update to the City’s General Plan and Zoning, which can be considered as a land use plan. The Guidelines recommend use of VMT per service population (population plus employment) as the VMT metric as VMT per service population is based on total VMT, which is comprehensive and accounts for all trip purposes. According to the Guidelines,³ a land use plan would have a significant impact if the VMT per service population of the land use plan is higher than the regional baseline VMT per service population.

Additionally, a region should be defined based on where the majority of the project trips are contained. Typically, it is the county boundary within which a majority of those trips take place. As such, the Guidelines recommend use of Orange County as the region for VMT analysis of projects and land use plans. Therefore, if the cumulative citywide VMT per service population is higher than Orange County’s baseline VMT per service population, the land use plan would have a significant VMT impact.

The Guidelines provide multiple screening criteria for land use projects. However, the proposed project involves an update to the City’s planning and zoning documents; therefore, none of the screening criteria are applicable to the project, which is a change to a land use plan. A detailed VMT analysis was conducted to evaluate the VMT impacts under the proposed project. The regional travel model, OCTAM, was used for the VMT assessment.

As indicated before, the VMT per service population was used to evaluate the proposed project’s VMT impacts. The proposed project would result in a significant impact if the cumulative VMT metric is greater than the regional baseline VMT metric. Hence, the proposed project would result in a significant impact if the citywide cumulative VMT per service population with the project would be greater than the Orange County baseline VMT per service population (threshold).

4.9.2 Existing Environmental Setting

4.9.2.1 Existing Circulation System

The City’s existing circulation system includes the following key roadways:

Holder Street is a north-south, two-to-four-lane, undivided roadway. According to the City of Cypress General Plan Circulation Element (2001), Holder Street is classified as a Secondary Arterial. The posted speed limit is 35 to 40 miles per hour (mph). Sidewalks are provided on both sides of the street and on-street parking is permitted in select locations.

Valley View Street is a north-south, six-lane, divided roadway. According to the City of Cypress General Plan Circulation Element (2001), Valley View Street is classified as a Major Arterial. Valley View Street is designated in the Orange County CMP as a CMP facility. The posted speed limit is 45 mph. Sidewalks are provided on both sides of the street and on-street parking is not permitted.

Walker Street is a north-south, four-to-five-lane, undivided roadway. According to the City of Cypress General Plan Circulation Element (2001), Walker Street is classified as a Secondary Arterial.

³ Ibid.



The average posted speed limit is 40 mph. Sidewalks are provided on both sides of the street. On-street parking is not permitted.

Moody Street is a north-south, four-lane, divided roadway. According to the City's General Plan Circulation Element (2001), Moody Street is classified as a Primary Arterial. The posted speed limit is 40 mph. On-street bicycle lanes (Class II) and sidewalks are provided on both sides of the street. On-street parking is generally not permitted.

Denni Street–Lexington Drive is a north-south, undivided roadway. Lexington Drive is a two-lane roadway south of Cerritos Avenue, and Denni Street is a four-lane roadway north of Cerritos Avenue. According to the City of Cypress General Plan Circulation Element (2001), Denni Street is classified as a Secondary Arterial. The posted speed limit of the segment between Lincoln Avenue to Ball Road is 40 mph and others have the speed limit of 35 mph. Sidewalks are provided on both sides of Denni Street and on some parts of Lexington Drive. On-street parking is not permitted.

Bloomfield Street is a north-south, four-lane, divided roadway. According to the City of Cypress General Plan (2001), Bloomfield Street is classified as a Secondary Arterial. The posted speed limit is 40 mph. On-street bicycle lanes (Class II) and sidewalks are provided on both sides of the street. On-street parking is permitted in select locations.

Katella Avenue is a six-lane divided roadway. Katella Avenue is designated as a Major Arterial in the City of Cypress General Plan (2001). Katella Avenue is designated in the Orange County CMP as a CMP facility. The posted speed limit is 45 mph. Sidewalks are provided on both sides of the street. On-street parking is permitted in select locations.

Cerritos Avenue is a four-to-five-lane, divided roadway. According to the City of Cypress General Plan (2001), Cerritos Avenue is a Primary Arterial. The posted speed limit is 45 mph. Sidewalks are provided on both sides of the street, and on-street (Class II) bicycle lanes are provided on both sides between Walker Street and Denni Street. On-street parking is permitted in select locations.

Orangewood Avenue is a four-lane, undivided roadway. According to the City of Cypress General Plan (2001), Orangewood Avenue is a Secondary Arterial. The posted speed limit is 35 to 40 mph. Sidewalks are provided on both sides of the street. On-street parking is not permitted.

Ball Road is a four-lane, divided roadway and it is classified as a Primary Arterial according to the City of Cypress General Plan (2001). The posted speed limit is 45 mph. On-street (Class II) bicycle lanes and sidewalks are provided on both sides of the street. On-street parking is not permitted.

Orange Avenue is a four-lane, undivided roadway, identified as Secondary Arterial in the City of Cypress General Plan (2001). The posted speed limit is 40 mph. Sidewalks are provided on both sides of the street. On-street bicycle lanes and on-street parking are provided in select locations.

Lincoln Avenue is a four-lane, divided roadway. According to the City of Cypress General Plan (2001), Lincoln Avenue is a Major Arterial. The posted speed limit is 40 mph. Sidewalks are provided on both sides of the street. On-street parking is provided in select locations.



4.9.2.2 Existing Traffic Volumes and LOS Analysis

Existing traffic volumes at study area intersections were collected in March 2022 and are provided in Appendix G. Additionally, Table 4.9.B summarizes the results of the existing peak-hour LOS analysis for the study area intersections. As shown in Table 4.9.B, all study area intersections currently operate at satisfactory LOS during both peak hours.

Table 4.9.B Existing Intersection Level of Service Summary

Study Area Intersection No.	Intersection	Jurisdiction	Existing			
			AM Peak Hour		PM Peak Hour	
			ICU	LOS	ICU	LOS
1	Bloomfield Street/Lincoln Avenue	City of Cypress	0.41	A	0.48	A
2	Lexington Drive-Denni Street/Lincoln Avenue	City of Cypress	0.51	A	0.52	A
3	Moody Street/Lincoln Avenue	City of Cypress	0.64	B	0.60	A
4	Walker Street/Lincoln Avenue	City of Cypress	0.55	A	0.60	A
5	Valley View Street/Lincoln Avenue	City of Cypress	0.55	A	0.59	A
6	Moody Street/Orange Avenue	City of Cypress	0.49	A	0.43	A
7	Walker Street/Orange Avenue	City of Cypress	0.57	A	0.54	A
8	Valley View Street/Orange Avenue	City of Cypress	0.61	B	0.62	B
9	Holder Street/Orange Avenue	City of Cypress	0.35	A	0.32	A
10	Bloomfield Street/Ball Road	City of Cypress/Los Alamitos	0.53	A	0.54	A
11	Moody Street/Ball Road	City of Cypress	0.53	A	0.49	A
12	Walker Street/Ball Road	City of Cypress	0.58	A	0.61	B
13	Valley View Street/Ball Road	City of Cypress	0.63	B	0.63	B
14	Bloomfield Street/Cerritos Avenue	City of Cypress/Los Alamitos	0.65	B	0.55	A
15	Lexington Drive-Denni Street/Cerritos Avenue	City of Cypress/Los Alamitos	0.42	A	0.45	A
16	Moody Street/Cerritos Avenue	City of Cypress	0.42	A	0.46	A
17	Walker Street/Cerritos Avenue	City of Cypress	0.50	A	0.56	A
18	Valley View Street/Cerritos Avenue	City of Cypress	0.63	B	0.69	B
19	Lexington Drive/Katella Avenue	City of Cypress/Los Alamitos	0.44	A	0.49	A
20	Siboney Street-Race Course/Katella Avenue	City of Cypress/Los Alamitos	0.37	A	0.43	A
21	Walker Street/Katella Avenue	City of Cypress/Los Alamitos	0.46	A	0.53	A
22	Valley View Street/Katella Avenue	City of Cypress	0.58	A	0.62	B
23	Holder Street/Katella Avenue	City of Cypress	0.30	A	0.36	A
24	Knott Avenue/Katella Avenue	City of Cypress	0.56	A	0.70	B
25	Valley View Street/Orangewood Avenue	City of Cypress	0.57	A	0.59	A
26	Knott Avenue/Orangewood Avenue	City of Cypress	0.42	A	0.49	A

Source: Compiled by LSA (2023).
ICU = Intersection Capacity Utilization
LOS = level of service



4.9.3 Regulatory Setting

4.9.3.1 Federal Regulations

No federal policies or regulations pertaining to transportation are applicable to the proposed project.

4.9.3.2 State Regulations

Senate Bill 743. On September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743 into law and started a process that changes the methodology of a transportation impact analysis as part of CEQA requirements. SB 743 directed the California Office of Planning and Research (OPR) to establish new CEQA guidance for jurisdictions that removes the LOS method, which focuses on automobile vehicle delay and other similar measures of vehicular capacity or traffic congestion, from CEQA transportation analysis. Rather, VMT, or other measures that promote “the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses,” are now be used as the basis for determining significant transportation impacts in the State.

State CEQA Guidelines Section 15064.3, Subdivision (b). In January 2018, the State of California Office of Planning and Research (OPR) submitted a proposal for comprehensive updates to the *State CEQA Guidelines* to the California Natural Resources Agency. The submittal included proposed updates related to the analysis of greenhouse gas (GHG) emissions, energy, transportation impacts pursuant to SB 743, and wildfires, as well as revisions to Section 15126.2(a) in response to the California Supreme Court’s decision in *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal. 4th 369. On December 28, 2018, the updated *State CEQA Guidelines* went into effect.

As part of the update to the *State CEQA Guidelines*, Section 15064.3 was added and codifies that project-related transportation impacts are typically best measured by evaluating the project’s VMT. Specifically, subdivision (b) focuses on specific criteria related to transportation analysis and is divided into four subdivisions: (1) land use projects, (2) transportation projects, (3), qualitative analysis, and (4) methodology. Subdivision (b)(1) provides guidance on determining the significance of transportation impacts of land use projects using VMT; projects located within 0.5 mile of high quality transit should be considered to have a less than significant impact. Subdivision (b)(2) addresses VMT associated with transportation projects and states that projects that reduce VMT, such as pedestrian, bicycle, and transit projects, should be presumed to have a less than significant impact. Subdivision (b)(3) acknowledges that Lead Agencies may not be able to quantitatively estimate VMT for every project type; in these cases, a qualitative analysis may be used. Subdivision (b)(4) stipulates that Lead Agencies have the discretion to formulate a methodology that would appropriately analyze a project’s VMT.

At this time, the City has not adopted a methodology to analyze VMT impacts within its jurisdiction. In addition, the City does not currently have thresholds or standards in place for assessing potential VMT impacts. Therefore, traffic impacts in this PEIR are based on the City’s LOS thresholds.



4.9.3.3 Regional Regulations

Orange County Congestion Management Program. The Orange County Transportation Authority (OCTA) is a multimodal transportation agency that began in 1991 with the consolidation of seven separate agencies. OCTA serves Orange County residents and travelers by providing the following: countywide bus and paratransit service; Metrolink rail service; the 91 Express Lanes; freeway, street, and road improvement projects; individual and company commuting solutions; motorist aid services; and regulation of taxi operations. State law requires that a Congestion Management Program (CMP) be developed, adopted, and updated biennially for every county that includes an urbanized area, and requires that it include every city and the county government within that county. As the Congestion Management Agency for Orange County, OCTA is responsible for implementing the Orange County CMP.

OCTA adopted the CMP in 1991 to reduce traffic congestion and to provide a mechanism for coordinating land use and development decisions in Orange County. Compliance with the CMP requirements ensures a city's eligibility to compete for State gas tax funds for local transportation projects.

County of Orange Master Plan of Arterial Highways (MPAH). The MPAH defines the arterial system in the Circulation Element of the Orange County General Plan. This system, which is the planned future roadway system in the County, incorporates several specific arterial roadway classifications. The Circulation Elements of cities within the County are expected to be consistent with the MPAH in order to be eligible for funding improvements on MPAH roadways.

County of Orange Measure M Growth Management Program. Measure M, approved in 1990 by the voters in the County, authorized the collection of a one-half percent sales tax to fund needed transportation improvements in the County. In order to be eligible to receive funds, cities must satisfy a number of requirements, including adopting a Circulation Element that is consistent with the County's MPAH, adopting a Growth Management Plan, and adopting a seven-year capital improvement program to include transportation projects funded by Measure M.

4.9.3.4 Local Regulations

City of Cypress General Plan. The Cypress General Plan⁴ is the primary source of long-range planning and policy direction that guides growth and preserves the quality of life within the community. The General Plan contains goals, policies, and plans that are intended to guide land use and development decisions. The General Plan, last comprehensively updated by the City Council in September 2001, includes a Land Use Map and the following eight elements, or chapters, which together fulfill the State requirements for a General Plan:

- Land Use Element
- Housing Element
- Circulation Element

⁴ City of Cypress. 2001a. *City of Cypress General Plan*.



- Conservation/Open Space/Recreation Element (satisfies the State’s Conservation and Open Space Element requirements)
- Safety Element
- Noise Element
- Air Quality Element (optional element not required by State law)
- Growth Management Element (optional element not required by State law)

Circulation Element. The Circulation Element⁵ is a general guide for the planning, development, and enhancement of the City’s public roadways, based on existing and anticipated land uses. Most transportation-related plans and programs are established with the goal of maintaining acceptable operating LOS on the City’s transportation system. The City of Cypress has adopted LOS D or better as the desired citywide operating standard for most City streets. However, given the influence of regional traffic on Valley View Street, Lincoln Avenue, and Katella Avenue, which are beyond the control of the City of Cypress, LOS E or better has been adopted as the minimum operating Level of Service for street segments and intersections on these arterials. The Circulation Element goals and policies define the City’s vision for a balanced, efficient circulation system which incorporate many modes of travel and which allows for the safe movement of people and goods in and around Cypress. Based on the Circulation Element, the local and regional street network is built out in Cypress. Similarly, the City’s bikeway system is generally built out, with the exception of a planned bike lane on Walker Street south of Cerritos Avenue. This proposed bike lane would connect to the existing bike lane on Walker Street north of Cerritos Avenue.

4.9.4 Thresholds of Significance

The thresholds for transportation impacts used in this analysis are consistent with Appendix G of the *State CEQA Guidelines* and the City’s *Initial Study/Environmental Checklist*. The proposed project may be deemed to have a significant impact with respect to transportation if it would:

- Threshold 4.9.1:** Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?
- Threshold 4.9.2:** Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?
- Threshold 4.9.3:** Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- Threshold 4.9.4:** Result in inadequate emergency access?

It should be noted that according to Section 4.17, Transportation, of the Initial Study prepared for the proposed project (Appendix A), the proposed project would result in less than significant

⁵ City of Cypress. 2001b. *City of Cypress General Plan* Circulation Element.



impacts regarding hazards due to a geometric design feature and inadequate emergency access (Thresholds 4.9.3 and 4.9.4). Therefore, these topics are not further addressed below.

4.9.5 Project Impacts

Threshold 4.9.1: Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less Than Significant Impact. A detailed LOS analysis was conducted for the proposed project based on the OCTAM model, using the County of Orange as the region. Based on the significance threshold criteria determined by the City of Cypress, no operational deficiencies would occur at any of the studied intersections under the General Plan Buildout (2045) conditions with implementation of the proposed project. Table 4.9.C shows the LOS analysis for the year 2045 with and without implementation of the proposed project. As shown below, in 2045, all intersections would operate at an acceptable LOS (D or better) and intersections along Valley View Street, Lincoln Avenue, and Katella Avenue would also operate at an acceptable LOS (E or better). Based on the LOS analysis, implementation of the proposed project would not create significant LOS changes under General Plan Build out conditions. See Table 4.9.D.

In addition, a VMT analysis was conducted for the proposed project based on the OCTAM model, using the County of Orange as the region. Based on the significance threshold criteria determined by the County of Orange, the cumulative citywide VMT per service population, under the proposed project rezoning scenario, would be lower than the regional threshold. Table 4.9.E compares the cumulative City and regional VMT per service population. Based on VMT analysis results, implementation of the proposed project would not exceed the threshold based on service population.

LOS and VMT analyses showed that the proposed project would not exceed significance thresholds established by the City of Cypress and County of Orange. Therefore, the proposed project would have a less than significant impact on transportation. No mitigation is required.

Additionally, compliance with the City’s Municipal Code will address transportation design and emergency access. The City’s Circulation Element includes numerous policies and implementation measures that are aligned with the objectives and priorities identified in the comment letter from Caltrans District 12. Objectives and policies provided in the Circulation Element include:

- **CIR-1:** Maintain a safe, efficient, economical, and aesthetically pleasing transportation system providing for the movement of people, goods, and services to serve the existing and future needs of the City of Cypress.
 - **CIR-1.1:** Respond to transportation problem areas with efforts to implement both interim and long-term solutions.



- **CIR-1.2:** Participate in transportation planning efforts which involve other governmental agencies, mandated programs, and regulations in order to minimize environmental impacts related to transportation and to enhance transportation systems.

Table 4.9.C: Year 2045 Without Project Intersection Level of Service Summary

Study Area Intersection No.	Intersection	Jurisdiction	2045 No Project			
			AM Peak Hour		PM Peak Hour	
			ICU	LOS	ICU	LOS
1	Bloomfield Street/Lincoln Avenue	City of Cypress	0.64	B	0.58	A
2	Lexington Drive-Denni Street/Lincoln Avenue	City of Cypress	0.72	C	0.63	B
3	Moody Street/Lincoln Avenue	City of Cypress	0.85	D	0.82	D
4	Walker Street/Lincoln Avenue	City of Cypress	0.79	C	0.78	C
5	Valley View Street/Lincoln Avenue	City of Cypress	0.71	C	0.76	C
6	Moody Street/Orange Avenue	City of Cypress	0.58	A	0.48	A
7	Walker Street/Orange Avenue	City of Cypress	0.64	B	0.60	A
8	Valley View Street/Orange Avenue	City of Cypress	0.67	B	0.70	B
9	Holder Street/Orange Avenue	City of Cypress	0.63	B	0.53	A
10	Bloomfield Street/Ball Road	City of Cypress/Los Alamitos	0.59	A	0.59	A
11	Moody Street/Ball Road	City of Cypress	0.59	A	0.54	A
12	Walker Street/Ball Road	City of Cypress	0.65	B	0.65	B
13	Valley View Street/Ball Road	City of Cypress	0.70	B	0.67	B
14	Bloomfield Street/Cerritos Avenue	City of Cypress/Los Alamitos	0.73	C	0.61	B
15	Lexington Drive-Denni Street/Cerritos Avenue	City of Cypress/Los Alamitos	0.52	A	0.56	A
16	Moody Street/Cerritos Avenue	City of Cypress	0.45	A	0.51	A
17	Walker Street/Cerritos Avenue	City of Cypress	0.52	A	0.60	A
18	Valley View Street/Cerritos Avenue	City of Cypress	0.76	C	0.76	C
19	Lexington Drive/Katella Avenue	City of Cypress/Los Alamitos	0.58	A	0.62	B
20	Siboney Street-Race Course/Katella Avenue	City of Cypress/Los Alamitos	0.48	A	0.56	A
21	Walker Street/Katella Avenue	City of Cypress/Los Alamitos	0.52	A	0.67	B
22	Valley View Street/Katella Avenue	City of Cypress	0.71	C	0.77	C
23	Holder Street/Katella Avenue	City of Cypress	0.59	A	0.71	C
24	Knott Avenue/Katella Avenue	City of Cypress	0.69	B	0.86	D
25	Valley View Street/Orangewood Avenue	City of Cypress	0.61	B	0.61	B
26	Knott Avenue/Orangewood Avenue	City of Cypress	0.69	B	0.62	B

Source: Compiled by LSA (2023).
ICU = Intersection Capacity Utilization
LOS = level of service



Table 4.9.D: Year 2045 With Project Intersection Level of Service Summary

Study Area Intersection No.	Intersection	Jurisdiction	2045 W/Project			
			AM Peak Hour		PM Peak Hour	
			ICU	LOS	ICU	LOS
1	Bloomfield Street/Lincoln Avenue	City of Cypress	0.64	B	0.60	A
2	Lexington Drive-Denni Street/Lincoln Avenue	City of Cypress	0.72	C	0.64	B
3	Moody Street/Lincoln Avenue	City of Cypress	0.86	D	0.83	D
4	Walker Street/Lincoln Avenue	City of Cypress	0.82	D	0.81	D
5	Valley View Street/Lincoln Avenue	City of Cypress	0.74	C	0.78	C
6	Moody Street /Orange Avenue	City of Cypress	0.59	A	0.49	A
7	Walker Street /Orange Avenue	City of Cypress	0.64	B	0.60	A
8	Valley View Street/Orange Avenue	City of Cypress	0.68	B	0.71	C
9	Holder Street/Orange Avenue	City of Cypress	0.64	B	0.53	A
10	Bloomfield Street/Ball Road	City of Cypress/Los Alamitos	0.58	A	0.58	A
11	Moody Street/Ball Road	City of Cypress	0.59	A	0.54	A
12	Walker Street /Ball Road	City of Cypress	0.66	B	0.66	B
13	Valley View Street/Ball Road	City of Cypress	0.70	B	0.68	B
14	Bloomfield Street/Cerritos Avenue	City of Cypress/Los Alamitos	0.74	C	0.61	B
15	Lexington Drive-Denni Street/Cerritos Avenue	City of Cypress/Los Alamitos	0.52	A	0.57	A
16	Moody Street/Cerritos Avenue	City of Cypress	0.44	A	0.50	A
17	Walker Street/Cerritos Avenue	City of Cypress	0.54	A	0.60	A
18	Valley View Street/Cerritos Avenue	City of Cypress	0.77	C	0.78	C
19	Lexington Drive/Katella Avenue	City of Cypress/Los Alamitos	0.57	A	0.63	B
20	Siboney Street-Race Course/Katella Avenue	City of Cypress/Los Alamitos	0.51	A	0.58	A
21	Walker Street /Katella Avenue	City of Cypress/Los Alamitos	0.54	A	0.68	B
22	Valley View Street/Katella Avenue	City of Cypress	0.71	C	0.77	C
23	Holder Street/Katella Avenue	City of Cypress	0.61	B	0.70	B
24	Knott Avenue/Katella Avenue	City of Cypress	0.69	B	0.86	D
25	Valley View Street/Orangewood Avenue	City of Cypress	0.61	B	0.62	B
26	Knott Avenue/Orangewood Avenue	City of Cypress	0.68	B	0.63	B

Source: Compiled by LSA (2023).

ICU = Intersection Capacity Utilization

LOS = level of service

Table 4.9.E: Cumulative City of Cypress and Regional VMT per Service Population Comparison

Scenario	City of Cypress VMT per Service Population (with Plan)	Orange County Threshold ¹	Difference	% Difference	Significant Impact?
2045 Proposed Project	27.4	30.3	-2.8	-9.4%	No

Source: Orange County Transportation Analysis Model (2023).

¹ Orange County threshold was estimated using an LSA baseline no plan model run.

VMT = vehicle miles traveled



- **CIR-1.3:** Encourage development which contributes to a balanced land use, which in turn serves to reduce overall trip lengths (i.e., jobs/housing balance, locate retail in closer proximity to resident/patrons).
- **CIR-1.4:** Require new development to conform to the standards and criteria of the City of Cypress and other mandated programs. This includes mitigation of traffic impacts to the surrounding street system.
- **CIR-1.5:** The City of Cypress will continue involvement in plans and programs related to the Circulation Element. This involvement is anticipated to result in traffic studies to be undertaken by City staff, to identify specific circulation programs and improvements to be implemented, in order to satisfy the various related programs.
- **CIR-1.6:** Encourage the development of aesthetic streetscapes to promote a positive City image and provide visual relief.
- **CIR-1.7:** Maintain consistency between the City Circulation Element and the Orange County Master Plan of Arterial Highways (MPAH).
- **CIR-2:** To facilitate alternative modes of transportation, including public transportation, bicycles, ridesharing, and pedestrians, to support the land use plans and related transportation needs.
 - **CIR-2.1:** Encourage development and improvements which incorporate innovative methods of accommodating transportation demands.
 - **CIR-2.2:** Give high priority to the establishment of a high-quality public transit system that minimizes dependency on the automobile.
 - **CIR-2.3:** Ensure that effective Transportation Demand Management (TDM) measures and programs are being implemented.
 - **CIR-2.4:** Encourage development and site design which facilitate implementation of high quality, desirable bicycle routes which meet or exceed established standards.
 - **CIR-2.5:** Implement adequate sidewalks to meet the required uses and needs, which serves to encourage alternative modes of transportation. Bicycle routes which utilize sidewalks require establishment of a City ordinance, per the Vehicle Code.
 - **CIR-2.6:** Respond to increases in demand for additional bus service through interaction with OCTA and other available resources.
 - **CIR-2.7:** Implement plan to install handicap access ramps to improve disabled access to transportation facilities.
 - **CIR-2.8:** Enhance the sidewalk environment to encourage pedestrian activities through streetscape and transit enhancement programs.
 - **CIR-2.9:** Enhance transit environment by improving passenger loading sites by providing bus benches, safety lighting and other projects to enhance bus stops.



Threshold 4.9.2: Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less Than Significant Impact. According to *State CEQA Guidelines* Section 15064.3(a), project-related transportation impacts are generally best measured by evaluating the project’s VMT, which refers to the amount and distance of automobile travel attributable to a project. The proposed project would result in a significant impact related to VMT if the cumulative citywide VMT per service population is higher than Orange County’s baseline VMT per service population. As shown in Table 4.9.E, under general build-out conditions in the year 2045, the VMT under the proposed project scenario would not exceed Orange County’s threshold. See Threshold 4.9.1 above for a discussion of the proposed project’s VMT impacts. The project would have a less than significant transportation impact. No mitigation is required.

4.9.6 Level of Significance Prior to Mitigation

The proposed project would not result in potentially significant impacts related to transportation. Through compliance with the City’s Municipal Code, the existing circulation network would not be adversely impacted or substantially degraded by the project’s population, VMT thresholds would not be exceeded, and the project’s impacts would be less than significant.

4.9.7 Regulatory Compliance Measures and Mitigation Measures

No regulatory compliance measures or mitigation measures are applicable to the proposed project pertaining to transportation.

4.9.8 Level of Significance after Mitigation

The proposed project would not result in potentially significant impacts related to transportation, and mitigation measures are not required.

4.9.9 Cumulative Impacts

The purpose of this section is to evaluate any additional incremental impact that the proposed project is likely to cause over and above the combined impacts of recently approved and proposed projects in Cypress. The impact area used to assess potential cumulative recreational impacts is Cypress because the proposed project would affect transportation facilities within Cypress.

Detailed LOS and VMT analyses were conducted for the proposed project based on the OCTAM model, using the County of Orange as the region. Based on the significance threshold criteria determined by the City of Cypress, no operational deficiencies would occur at any of the studied intersections under the General Plan Build-out (2045) conditions with implementation of the proposed project. Based on the significance threshold criteria determined by the County of Orange, the cumulative citywide VMT per service population would be lower than the regional threshold. Therefore, the proposed project would have a less than significant transportation impact.

Additionally, compliance with the City’s Municipal Code will address transportation design and emergency access. Impacts from the proposed project would not be considered cumulatively considerable.



4.10 TRIBAL CULTURAL RESOURCES

This section provides a discussion of the existing tribal cultural resource environment and an analysis of potential impacts to tribal cultural resources from the 2021–2029 Cypress Housing Element Implementation Project (proposed project). According to California Public Resources Code (PRC) Section 21080.3.1 and Chapter 532, Statutes 2014 (i.e., Assembly Bill 52), “tribal cultural resources” are defined as the following:

1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either: (A) included or determined to be eligible for inclusion in the California Register of Historical Resources; or (B) included in a local register of historical resources as defined in subdivision (k) of Section 5020.1
2. 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 Section 5024.1

This section summarizes information obtained from Senate Bill (SB) 18 and Assembly Bill (AB) 52 Native American consultation efforts completed in support of the proposed project. The record of these consultation efforts is contained in Appendix H of this Program Environmental Impact Report (PEIR).

4.10.1 Methodology

4.10.1.1 Senate Bill 18

California Government Code Section 65352.3 (adopted pursuant to the requirements of SB 18) requires local governments to contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or amend a General or Specific Plan. The tribal organizations eligible to consult have traditional lands in a local government’s jurisdiction and are identified, upon request, by the Native American Heritage Commission (NAHC). As noted in the Governor’s Office of Planning and Research’s *Tribal Consultation Guidelines, Supplement to General Plan Guidelines* (2005)¹, “The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places.”

The NAHC was contacted to conduct a Sacred Lands File (SLF) search and to provide a list of Native American contacts for the project pursuant to SB 18. The NAHC responded on September 6, 2022, stating that an SLF search was completed for the opportunity sites with negative results. The NAHC recommended that 19 Native American individuals representing the Diegueno, Gabrielino, Juaneño, Cupeño Luiseño, and Cahuilla Luiseño groups be contacted for information regarding tribal cultural resources that could potentially be affected by the project. These 19 individuals were contacted via letter by certified mail on November 8, 2022. The letters, which concurrently fulfilled both SB 18 and AB 52 requirements, provided each tribe with an opportunity to request consultation with the City

¹ Governor’s Office of Planning and Research (OPR). 2005. *Tribal Consultation Guidelines, Supplement to General Plan Guidelines*. Website: https://www.parks.ca.gov/pages/22491/files/tribal_consultation_guidelines_vol-4.pdf (accessed May 2023).



regarding the proposed project. In compliance with SB 18, the tribes had 90 days from the date of receipt of notification to request consultation on the proposed project. A response was received from Chairman Andrew Salas on behalf of the Gabrieleno Band of Mission Indians – Kizh Nation. This response did not request consultation on the project but did request consultation on future projects within the area.

4.10.1.2 Assembly Bill 52

Chapter 532, Statutes of 2014 (i.e., AB 52), requires that Lead Agencies evaluate a project’s potential to impact “tribal cultural resources.” Such resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources (Public Resources Code [PRC] Section 21074). AB 52 also gives Lead Agencies the discretion to determine, supported by substantial evidence, whether a resource falling outside the definition stated above nonetheless qualifies as a “tribal cultural resource.”

Also, per AB 52 (specifically PRC Section 21080.3.1), as Lead Agency, the City of Cypress (City) must consult California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project site and have previously requested that the Lead Agency provide the tribe with notice of such projects. Letters were sent to three individuals who had previously requested to be notified of projects during AB 52 consultation, representing the Juaneño, Gabrielino, and Luiseño groups. These individuals were contacted via letter by certified mail on November 8, 2022, with the exception of Isaiah Vivanco, Chairperson of the Soboba Band of Luiseño Indians, who was contacted on September 15, 2022. Apart from the Gabrieleno Band of Mission Indians – Kizh Nation, no responses were received.

Letters have also been sent to Native American tribal contacts provided by the NAHC, as previously described. The letters, simultaneously compliant with both SB 18 and AB 52 guidelines, provided each tribe with an opportunity to request consultation with the City regarding the proposed project. In compliance with AB 52, tribes had 30 days from the date of receipt of notification to request consultation on the proposed project. No requests for consultation on the project were received in response to the transmitted SB 18-AB 52 combination letters.

4.10.2 Existing Environmental Setting

The area that is now the City of Cypress was prehistorically occupied by several different Native American tribes with unique oral histories, societal structures, and ways of life. This area is within the traditional boundaries of the Gabrielino. To date, no federally recognized tribes claim to have occupied the land that is now considered the City of Cypress.

4.10.3 Regulatory Setting

4.10.3.1 Federal Regulations

Archaeological Resources Protection Act. The Archaeological Resources Protection Act was enacted in 1979 with the purpose of securing the protection of archaeological resources and sites on public lands and Native American lands, and to foster increased cooperation and exchange of information



between governmental authorities, the professional archaeological community, and private individuals.

Native American Graves Protection and Repatriation Act. The Native American Graves Protection and Repatriation Act (NAGPRA) was passed in 1990 with the purpose of outlining a process for museums and federal agencies to return certain Native American cultural items (e.g., human remains, funerary objects, sacred objects, or objects of cultural patrimony) to lineal descendants, and culturally affiliated Indian tribes. NAGPRA also establishes procedures for the inadvertent discovery or planned excavation of Native American cultural items on federal or tribal lands. While these provisions do not apply to discovery or excavations on private or State lands, the collection portions of NAGPRA may apply to cultural items if they are under the control of an institution that receives federal funding. NAGPRA also makes it a criminal offense to traffic in Native American human remains without right of possession or in cultural items obtained in violation of NAGPRA.

4.10.3.2 State Regulations

Native American Heritage Commission. In 1976, the California State Government passed AB 4239, creating the NAHC. The NAHC is responsible for identifying and categorizing Native American cultural resources as well as preventing damage to designated sacred sites and associated artifacts and remains. Legislation passed in 1982 authorized the NAHC to identify a Most Likely Descendant (MLD) when Native American remains are found outside the boundaries of a designated cemetery. An MLD has the authority to make recommendations in regard to the treatment and disposition of the discovered remains.

California Public Resources Code Sections 5097.9–5097.991. California Public Resources Code (PRC) Sections 5097.9–5097.991 provide protection to Native American historical and cultural resources (including sanctified cemeteries, places of worship, religious sites, or sacred shrines) and sacred sites, and gives the NAHC enforcement authority.

Specifically, California PRC Section 5097.98 outlines procedures that must be followed in the event that human remains are discovered. The County Coroner shall make a determination within 2 working days from the time the person responsible for the excavation, or designee, notifies the County Coroner of the discovery or recognition of the human remains. If the County Coroner identifies the remains to be of Native American origin or has reason to believe that the remains are those of Native American origin, the County Coroner must contact the California NAHC within 24 hours. The NAHC representative will then alert a Native American MLD to conduct an inspection of the site and to determine the following course of treatment and action. Additionally, *State CEQA Guidelines* Section 15064.5 sets forth a procedure if human remains are found on land outside of federal jurisdiction.

Health and Safety Code Section 7050.5. Section 7050.5 of the California Health and Safety Code protects Native American burials, remains, and associated grave artifacts in the event they are discovered in any location other than a designated cemetery. The Health and Safety Code mandates the immediate stop of excavation on the site as well as any adjacent or overlying area where the remains or associated items are found and provides for the sensitive disposition of those remains. Should remains be discovered, the County Coroner must determine that the remains are not subject



to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or designee, in the manner provided in PRC Section 5097.98.

Senate Bill 18 (SB 18) Tribal Consultation. California Government Code Section 65352.3 (adopted pursuant to the requirements of SB 18) requires local governments to contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or amend a General or Specific Plan. The tribal organizations eligible to consult have traditional lands in a local government’s jurisdiction and are identified, upon request, by the NAHC. As noted in the Governor’s Office of Planning and Research’s *Tribal Consultation Guidelines, Supplement to General Plan Guidelines* (2005)¹, “the intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places.”

Assembly Bill 52 (AB 52) Tribal Consultation. California PRC Section 21080.3.1 and Chapter 532, Statutes 2014 (i.e., AB 52), require that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource, as defined, is a project that may have a significant effect on the environment. The bill requires a lead agency to begin consultation with each California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project, if the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area and the tribe requests consultation, prior to determining whether a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report is required for a project. The bill specifies examples of mitigation measures that may be considered to avoid or minimize impacts on tribal cultural resources. The bill makes the above provisions applicable to projects that have a Notice of Preparation or a notice of Negative Declaration or Mitigated Negative Declaration filed on or after July 1, 2015. By requiring the lead agency to consider these effects relative to tribal cultural resources and to conduct consultation with California Native American tribes, this bill imposes a State-mandated local program.

4.10.3.3 Regional Regulations

There are no regional regulations that are applicable to tribal cultural resources relevant to the proposed project.

4.10.3.4 Local Regulations

There are no local regulations that are applicable to tribal cultural resources relevant to the proposed project.

4.10.4 Thresholds of Significance

The thresholds for tribal cultural resources impacts used in this analysis are consistent with Appendix G of the *State of California Environmental Quality Act (CEQA) Guidelines* and the City’s *Initial Study/Environmental Checklist*. The proposed project may be deemed to have a significant impact with respect to tribal cultural resources if it would:



Threshold 4.10.1: Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).

Threshold 4.10.2: Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

4.10.5 Project Impacts

Threshold 4.10.1: **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?**

Less Than Significant Impact. In January 2020, a cultural resource record search was completed as part of the environmental review process for the proposed mixed-use Cypress City Center project, located directly across Katella Avenue to the south of the Cypress Business and Professional Center Specific Plan (CBPC Specific Plan) opportunity site. A record search was conducted at the South Central Coastal Information Center (SCCIC) of the California Historical Resources Information System (CHRIS) at California State University, Fullerton. It included a review of all prehistoric and historic archaeological sites within a 0.25-mile radius of the Cypress City Center site, as well as a review of known cultural resource survey and excavation reports in that area. The California State Historic Resources Inventory (HRI), National Register of Historic Places (National Register), California Historical Landmarks (SHL), California Points of Historical Interest (SPHI), and various local historical registers were examined. The SCCIC record search included the project site and the areas within 0.25 mile of the Cypress City Center site. No tribal archaeological resources had been previously recorded within the Cypress City Center site, and none were discovered as a result of the record



search¹. Because the Cypress City Center site is located within the CBPC Specific Plan Area, this record search can be reasonably applied to the proposed project's opportunity sites within the Cypress Town Center and Commons Specific Plan 2.0 (CTCC Specific Plan) and CBPC Specific Plan. Numerous previous searches have concluded that the Lincoln Avenue Specific Plan (LASP) Area contains no archaeological sites with the potential to yield tribal cultural resources. An IS/MND prepared for the City's 2009 Housing Element Update, which included an amendment to the LASP, found that no historic and/or cultural resources were located on or adjacent to the LASP area.² This has been upheld by other reports in the following years. As a result of the conditions discussed above, a new tribal cultural resource records search under the proposed project was determined to be unnecessary by the City.

Native American consultations were conducted in compliance with SB 18 and AB 52. As part of these consultations, the City asked the NAHC to conduct a record search of the Sacred Lands File (SLF) to identify known tribal cultural resources, which yielded negative results. However, it is important to note that records maintained by the NAHC and CHRIS are not exhaustive, and a negative response to these searches does not preclude the existence of a tribal cultural resource. The City also asked the NAHC to provide a list of recommended tribal contacts applicable to the project, which were contacted on November 8, 2022, and formally invited to consult with the City on the proposed project, as well as to provide information on known tribal cultural resources not contained within NAHC or CHRIS records.

At the time of this document's preparation, one response has been received. Chairman Andrew Salas responded on behalf of the Gabrieleno Band of Mission Indians – Kizh Nation that consultation regarding the project was not necessary. Chairman Salas stated that the tribal government would like consultation for all future projects within the project's location. Therefore, no further action or consultation with the above NAHC-listed tribes is required at this time; however, consultation is requested by the Gabrieleno Band of Mission Indians – Kizh Nation for future City projects on a case-by-case basis.

No information regarding specific known tribal cultural resources on the opportunity sites was provided by the tribe. Therefore, no tribal cultural resources listed or eligible for listing in the California Register of Historical Resources (California Register) or in a local register exist within the opportunity sites, and there are no known tribal cultural resources on the opportunity sites. The proposed project would have less than significant impacts pertaining to a substantial adverse change in the significance of a tribal cultural resource defined as a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register or in a local register of historical resources as defined in PRC Section 5020.1(k), and no mitigation is required.

¹ City of Cypress. 2020. *Cypress City Center Project Environmental Report, Draft, SCH #2019110458*. Section 4.16-4. Website: https://files.ceqanet.opr.ca.gov/257330-3/attachment/pPtqudn4yD91UlsUP_CKNqJ72MJ0kYIHFzJsGzBHYFnlGwkhITD33EKMOE--4IQodoGX3ne3ABNyI6Km0 (accessed May 2023).

² City of Cypress. 2016. *City of Cypress Initial Study/Mitigated Negative Declaration Addendum, 2016 Lincoln Avenue Specific Plan Amendment*.



Threshold 4.10.2: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public 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. Native American consultation for the proposed project was conducted in compliance with SB 18 and AB 52. As part of these consultations, review of the SLF by the NAHC yielded negative results. Subsequently, Native American representatives were contacted by the City to determine their desire to consult on the proposed project. Throughout the process, the City received one response from Chairman Andrew Salas on behalf of the Gabrieleno Band of Mission Indians – Kizh Nation. This response did not request to initiate the formal consultation process and no other requests for consultation on the project were received during SB 18 and AB 52 outreach.

Because the tribal outreach process yielded no knowledge of significant tribal resources, it can reasonably be assumed that the proposed project would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC 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.

Because future development of the opportunity sites could require excavation and other potentially disturbing aspects of construction into soils, there is a potential to uncover undiscovered tribal cultural resources during excavation, including human remains. Therefore, while unlikely, the presence of undiscovered subsurface tribal cultural resources within the project site is possible, and these resources could potentially be affected by construction activities.

Regulatory Compliance Measure (RCM) CUL-1, as detailed in Section 4.2, Cultural Resources, requires compliance with California PRC Section 21083.2(g) for the treatment of unearthed archaeological resources. Adherence to regulatory standards included in Regulatory Compliance Measure RCM CUL-1 would reduce the impact of the proposed project on unknown unique archaeological resources to less than significant, in the event that previously unknown deposits with tribal cultural significance are discovered during construction activities within any of the opportunity sites.

As also discussed in Section 4.2, Cultural Resources, Regulatory Compliance Measure RCM CUL-2 requires compliance with the State’s Health and Safety Code for the treatment of human remains. Adherence to regulatory standards included in Regulatory Compliance Measure RCM CUL-2 would reduce the impact of the proposed project on human remains to less than significant, in the event that previously unknown remains are discovered during construction activities within any of the opportunity sites.



Based on the discussion above, the proposed project’s potential impacts to known and unknown tribal cultural resources would be less than significant.

4.10.6 Level of Significance Prior to Mitigation

Impacts to known or unknown tribal cultural resources would be less than significant. No mitigation is required.

4.10.7 Regulatory Compliance Measures and Mitigation Measures

4.10.7.1 Regulatory Compliance Measures

Refer to Regulatory Compliance Measures RCMs CUL-1 and CUL-2 in Section 4.2, Cultural Resources.

4.10.7.2 Mitigation Measures

No mitigation measures are required.

4.10.8 Level of Significance after Mitigation

Impacts to known and unknown tribal cultural resources would be less than significant. No mitigation is required.

4.10.9 Cumulative Impacts

Defined in Section 15130 of the *State CEQA Guidelines*, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and reasonably foreseeable projects in an area of interest.

The proposed project would result in less than significant impacts to known and unknown tribal cultural resources listed or eligible for listing in the California Register of Historical Resources, in a local register of historical resources as defined in PRC Section 5020.1(k), or otherwise determined by the lead agency to be significant. Further, each individual development proposal received by the City that requires discretionary approval is required to undergo individual environmental review pursuant to CEQA. AB 52 outreach would be required for those discretionary projects for which a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact is prepared. Furthermore, impacts of other projects on tribal cultural resources are generally site-specific resulting from ground-disturbing activities, which would require unique impact analysis to determine the nature and extent of the resources and identify appropriate mitigation measures that would reduce or avoid significant impacts. Thus, there is no potential for the project to contribute towards a significant cumulative impact associated with the significance of a tribal cultural resource pursuant to California Code of Regulations Section 15064.5.

Additionally, when resources can be assessed and/or protected as they are discovered, impacts to these resources are less than significant. As such, adherence to the regulatory standards in Regulatory Compliance Measures RCMs CUL-1 and CUL-2 would ensure that the proposed project, together with the related projects, would result in less than significant cumulative impacts to tribal cultural resources.



4.11 UTILITIES AND SERVICE SYSTEMS

This section describes the utility providers within whose jurisdiction the project site is located and evaluates the potential impacts of the 2021–2029 Cypress Housing Element Implementation Project (proposed project) on utilities and service systems. This section is based on multiple data sources, including written correspondence and coordination with utility providers, attached in Appendix F of this Draft Program Environmental Impact Report (PEIR) and the California Emissions Estimator Model (CalEEMod) outputs generated for the proposed project (Appendix B). This section addresses the following utilities and service systems (service providers are noted in parentheses).

- Electricity—Southern California Edison (SCE)
- Natural Gas—Southern California Gas Company (SoCalGas)
- Solid Waste—Valley Vista Services; Orange County Waste and Recycling (OCWR)
- Wastewater—Orange County Sanitation District (OCSD)
- Potable Domestic Water—Golden State Water Company (GSWC)
- Storm Drainage—Orange County Flood Control District (OCFCD)

4.11.1 Methodology

For information on current water and wastewater service provided to the opportunity sites and possible constraints or impacts to this service associated with project build out (which is anticipated to occur in 2029), the OCSD and GSWC were sent a questionnaire. The impact analyses for water demand and wastewater generation are based on information obtained through subsequent conversations with utility provider representatives, data obtained through websites, and adopted planning documents of the service and utility providers. This analysis also includes CalEEMod outputs generated for the proposed project, which are included in Appendix B of this EIR. Correspondence with utility providers is included in Appendix F.

Information on current electricity, natural gas, solid waste, and storm drainage service provided to the opportunity sites and possible constraints or impacts to this service associated with project build out was obtained through websites, adopted planning documents of service and utility providers, and CalEEMod outputs generated for the proposed project, which are included in Appendix B of this PEIR).

4.11.2 Existing Environmental Setting

4.11.2.1 Electricity

In 2021, California’s electricity was generated primarily by natural gas (37.9 percent), coal (3.0 percent), large hydroelectric (9.2 percent), nuclear (9.3 percent), and renewable sources



(33.6 percent). Total electric generation in California in 2021 was 277,764 gigawatt-hours (GWh), up 1.9 percent from the 2020 total generation of 272,576 GWh.¹

The City is within the service territory of Southern California Edison (SCE), which provides services through a grid of transmission lines and related facilities. SCE provides electricity to more than 15 million people in a 50,000-square-mile (sq mi) area of Central, Coastal, and Southern California.² According to the California Energy Commission (CEC), total electricity consumption in the SCE service area in 2021 was 81,129 GWh³ and total electricity consumption in Orange County in 2021 was 18,932 GWh (7,272 GWh for the residential sector and 11,660 GWh for the non-residential sector).⁴

4.11.2.2 Natural Gas

Natural gas consumed in California is used for electricity generation (45 percent), residential uses (21 percent), industrial uses (25 percent), and commercial uses (9 percent). California continues to depend upon out-of-state imports for nearly 90 percent of its natural gas supply.⁵ Southern California Gas Company (SoCalGas), the service provider for the City, serves approximately 21.1 million customers in a 24,000 sq mi service territory.⁶ SoCalGas has four storage fields—Aliso Canyon, Honor Rancho, La Goleta, and Playa del Rey—and has a combined storage capacity of 74 billion cubic feet.⁷

According to the CEC, total natural gas consumption in the SoCalGas service area in 2021 was 5,101 million therms (2,261 million therms for the residential sector and 937 million therms for the commercial sector)⁸ and total natural gas consumption in Orange County in 2021 was 580 million therms (362 million therms for the residential sector and 218 million therms for the non-residential sector).⁹

¹ California Energy Commission (CEC). 2021. *2021 Total System Electric Generation*. Website: <https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2021-total-system-electric-generation> (accessed May 11, 2023).

² Southern California Edison (SCE). n.d. *About Us*. Website: <https://www.sce.com/about-us/who-we-are> (accessed May 11, 2023).

³ CEC. n.d.-b. *Electricity Consumption by Entity*. Website: <http://www.ecdms.energy.ca.gov/elecbyutil.aspx> (accessed May 11, 2023).

⁴ CEC. n.d.-a. *Electricity Consumption by County*. Website: <http://www.ecdmsenergy.ca.gov/elecbycounty.aspx> (accessed May 11, 2023).

⁵ CEC. n.d.-e. *Supply and Demand of Natural Gas in California*. Website: <https://www.energy.ca.gov/data-reports/energy-almanac/californias-natural-gas-market/supply-and-demand-natural-gas-california> (accessed May 11, 2023).

⁶ Southern California Gas Company (SoCalGas). n.d. *Company Profile: About SoCalGas*. Website: <https://www.socalgas.com/about-us/company-profile> (accessed May 11, 2023).

⁷ U.S. Energy Information Administration (EIA). 2019. *Today in Energy* Webpage. Website: <https://www.eia.gov/todayinenergy/detail.php?id=36416> (accessed May 11, 2023).

⁸ CEC. n.d.-d. *Gas Consumption by Entity*. Website: <https://ecdms.energy.ca.gov/gasbyutil.aspx> (accessed May 11, 2023).

⁹ CEC. n.d.-c. *Gas Consumption by County*. Website: <http://www.ecdms.energy.ca.gov/gasbycounty.aspx> (accessed May 11, 2023).



4.11.2.3 Solid Waste

The City currently contracts with Valley Vista Services of Orange County, a private solid waste hauler, to collect and dispose of the solid waste/refuse generated in the City. Solid waste/refuse collected in the City by Valley Vista is transported to one of the Class III landfills operated and maintained by Orange County Waste and Recycling (OCWR). Class III landfills only accept non-hazardous municipal solid waste for disposal; no hazardous or liquid waste is accepted. County residents are able to dispose of their household hazardous waste items at any of OCWR’s four household hazardous waste collection centers. Currently, OCWR maintains and operates three Class III sanitary landfills, identified below in Table 4.11.A.

Table 4.11.A: Orange County Class III Landfills

Landfill	Location	Service
Frank R. Bowerman	11002 Bee Canyon Access Road Irvine, CA 92602	Commercial dumping No public dumping
Olinda Alpha	1942 North Valencia Avenue Brea, CA 92823	Commercial dumping Public dumping allowed
Prima Deshecha	32250 La Pata Avenue San Juan Capistrano, CA 92675	Commercial dumping Public dumping allowed

Source: Orange County Waste and Recycling. n.d. Landfill Information.

The Frank R. Bowerman Landfill is projected to serve residents and businesses until approximately 2053. The landfill is currently permitted by the California Department of Resources, Recycling, and Recovery (CalRecycle) to receive a maximum of 11,500 tons per day (tpd) of waste, with a currently annual average of 8,500 tpd.¹⁰ Therefore, the Frank R. Bowerman Landfill currently operates at approximately 73.0 percent of its daily capacity. As of February 2008, the Frank R. Bowerman Landfill had an estimated remaining disposal capacity of 205,000,000 cubic yards.¹¹

The Olinda Alpha Landfill is scheduled to close in approximately 2030, at which time it will be landscaped to become a County Regional Park.¹² The Olinda Alpha Landfill is currently permitted by CalRecycle to receive a maximum of 8,000 tpd of waste, but currently receives an average of approximately 7,000 tpd.¹³ Therefore, the Olinda Alpha Landfill currently operates at approximately 87.5 percent of its daily capacity. As of October 2020, the Olinda Alpha Landfill had an estimated remaining disposal capacity of 17,500,000 cubic yards.¹⁴

¹⁰ Orange County Waste & Recycling. n.d. *Landfill Information*. Website: <http://www.oilandfills.com/landfill> (accessed May 11, 2023).

¹¹ California Department of Resources, Recycling, and Recovery (CalRecycle). n.d.-a. *SWIS Facility Detail, Frank R. Bowerman Sanitary LF (30-AB-0360)*. Website: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2767?siteID=2103> (accessed May 11, 2023).

¹² Orange County Waste & Recycling. n.d. *Landfill Information*. Website: <http://www.oilandfills.com/landfill> (accessed May 11, 2023).

¹³ Ibid.

¹⁴ CalRecycle. n.d.-b. *SWIS Facility Detail, Olinda Alpha Landfill (30-AB-0035)*. Website: <https://www2.calrecycle.ca.gov/swfacilities/Directory/30-AB-0035> (accessed May 11, 2023).



The Prima Deshecha Landfill is projected to serve residents and business until approximately 2102 and features several environmental protection measures, including odor control systems, 5.7 acres of wetland, 175 acres of coastal sage scrub, and 11 acres of riparian mitigation.¹⁵ The landfill is currently permitted by CalRecycle to receive 4,000 tpd and as of November 2018, had a remaining capacity of 134,300,000 cubic yards.¹⁶

4.11.2.4 Wastewater

The Orange County Sanitation District (OCSD) is responsible for safely collecting, treating, and disposing the wastewater in central and northwest Orange County, including in the City of Cypress. The OCSD provides wastewater collection, treatment, and recycling for approximately 2.6 million people living within its 479 square-mile service area.¹⁷ The OCSD's facilities include 396 miles of sewer pipes and 15 pump stations located throughout the county. The OCSD treats approximately 188 million gallons of wastewater from residential, commercial, and industrial sources per day that is sent to two treatment plants: Reclamation Plant No. 1, located at 10844 Ellis Avenue in Fountain Valley on an approximately 109-acre site owned by the Sanitation District, and Treatment Plant No. 2, located at 22212 Brookhurst Street in Huntington Beach on an approximately 111-acre site owned by the Sanitation District.¹⁸

The OCSD is responsible for the provision of wastewater treatment facilities that serve the City. Sewage from the City of Cypress is diverted to either Reclamation Plant No. 1 or Treatment Plant No. 2. Excess wastewater from any of six trunk sewers tributary to Reclamation Plant No. 1 is diverted to Treatment Plant No. 2 to not overload the capacity of Reclamation Plant No. 1 and to provide for maintenance or construction activities.¹⁹ Reclamation Plant No. 1 has a primary treatment capacity of 208 million gallons per day (mgd),²⁰ and is running under capacity at approximately 120 mgd.²¹ Treatment Plant No. 2 has a primary treatment capacity of 168²² mgd and currently receives 59 mgd.²³ Additionally, through its Capital Improvement Program, the OCSD strives to continue maintaining its facilities at optimal levels by planning, designing, and preparing

¹⁵ Orange County Waste & Recycling. n.d. *Landfill Information*. Website: <http://www.oclandfills.com/landfill> (accessed May 11, 2023).

¹⁶ CalRecycle. n.d.-c. *SWIS Facility Detail, Prima Deshecha Landfill (30-AB-0019)*. Website: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2750?siteID=2085> (accessed May 11, 2023).

¹⁷ Orange County Sanitation District (OCSD). n.d.-a. *About Us, General Information, Service Area*. Website: <https://www.ocsan.gov/about-us/general-information/service-area> (accessed May 12, 2023).

¹⁸ Orange County Sanitation District (OCSD). 2020. *Draft 2020 Program Environmental Impact Report for the 2017 Facilities Master Plan, SCH# 2019070998*. September 2020.

¹⁹ Orange County Sanitation District (OCSD). 2019a. *2018–2019 Annual Report Resource Protection Division Pretreatment Program*. Website: <https://www.ocsd.com/Home/ShowDocument?id=29255> (accessed May 12, 2023).

²⁰ Orange County Sanitation District (OCSD). 2019b. *Budget Update Fiscal Year 2019-2020*. Website: <https://www.ocsd.com/Home/ShowDocument?id=28411> (accessed May 12, 2023).

²¹ Ibid.

²² Ibid.

²³ Orange County Sanitation District (OCSD). n.d.-b. *Facts and Key Statistics*. Website: <https://www.ocsd.com/services/regional-sewer-service> (accessed May 12, 2023).



for future demand by developing Facilities and Biosolids Master Plans that address 20-year planning horizons.²⁴

4.11.2.5 Potable Domestic Water Service

Domestic water service to the City is provided by Golden State Water Company (GSWC). The City is within the Los Alamitos West Orange Service Area. GSWC’s Los Alamitos West Orange Service Area includes Cypress, Los Alamitos, and Stanton; additionally, small portions of Buena Park, Garden Grove, La Palma, Seal Beach, and the unincorporated community of Rossmoor are included. There are approximately 27,200 customers within GSWC’s Los Alamitos West Orange Service Area.²⁵

The Los Alamitos West Orange Service Area 2020 Urban Water Management Plan (UWMP) demonstrates that GSWC has adequate domestic water supply for future water demands in normal, single dry years, and five consecutive dry year conditions through 2045. The entire GSWC West Orange system is considered potable and is supplied from two primary sources: local groundwater and imported water purchased from the Metropolitan Water District of Southern California (MWD) through Municipal Water District of Orange County (MWDOC). A small portion of water is also supplied by recycled water from the City of Cerritos and through a contract with the City of Seal Beach. GSWC owns and operates 14 active wells with a combined capacity of 11,850 gallons per minute, which pump local groundwater from the Coastal Plain of Orange County Groundwater Basin. The UWMP includes a water supply and demand assessment that demonstrates that adequate water supply, including both imported groundwater and groundwater from GSWC-owned wells, will be available to GSWC through 2045.²⁶ The projected water demands for customers served by GSWC in the Los Alamitos West Orange Service Area is shown in Table 4.11.B.

Table 4.11.B: Projected Water Demands by Use Through 2045 (AFY)

Category	Water Demand				
	2025	2030	2035	2040	2045
Single Family	6,493	6,671	6,855	7,044	7,237
Multi Family	2,667	2,740	2,816	2,893	2,973
Commercial/Institutional	3,283	3,374	3,467	3,562	3,660
Industrial	59	61	62	64	66
Landscape	810	833	856	879	903
Water Loss	825	848	871	895	920
Total	14,137	14,527	14,926	15,337	15,759

Source: *West Orange Service Area 2020 Urban Water Management Plan, Table 4-5: Projected Water Demands* (GSWC, July 15, 2021).

AFY = acre-feet per year

GSWC = Golden State Water Company

²⁴ OCSD. 2019c. *Capital Improvement Program Fiscal Year 2021–22*. Website: <https://online.fliphtml5.com/zecoq/ajho/> (accessed May 12, 2023).

²⁵ Golden State Water Company (GSWC). n.d. *Los Alamitos West Orange County*. Website: <https://www.gswater.com/los-alamitos> (accessed May 12, 2023).

²⁶ GSWC. 2020. *2020 Urban Water Management Plan, West Orange*.



The total water supply available to the GSWC Los Alamitos West Orange Service Area is shown in Table 4.11.C.

Table 4.11.C: Total Water Supplies Available to GSWC West Orange Through 2045 (AFY)

Water Supply	2025	2030	2035	2040	2045
Groundwater	19,800	20,210	20,630	21,062	21,505
MWD of Orange County	2,100	2,100	2,100	2,100	2,100
City of Seal Beach Contract	40	40	40	40	40
Recycled Water	250	250	250	250	250
Total	21,940	22,350	22,770	23,202	23,645

Source: *West Orange Service Area 2020 Urban Water management Plan, Chapter 3 – Water Supply*. (GSWC, July 15, 2021).

AFY = acre-feet per year

MWD = Metropolitan Water District

GSWC = Golden State Water Company

The GSWC Los Alamitos West Orange Service Area only accesses enough water to meet its need in any given year. Accordingly, although some of the supplies available to GSWC Los Alamitos West Orange Service Area are shared among three GSWC service areas, GSWC Los Alamitos West Orange Service Area would not acquire the additional supplies unless they are needed as part of GSWC’s regional water management among the three service areas. As such, the GSWC Los Alamitos West Orange Service Area would acquire the total projected supplies as shown in Table 4.11.A, above.

4.11.2.6 Storm Drain

Orange County Flood Control District (OCFCD) owns and operates the stormwater control systems in the City. OCFCD has mapped out the City’s as well as the rest of the County’s stormwater facilities. The stormwater facilities carry runoff away from impermeable surfaces in the City to designated drainage areas.

4.11.2.7 Telecommunications Facilities

Telephone, television, and internet services are offered by a variety of providers in the City of Cypress, including AT&T, Frontier Communications, Spectrum, HughesNet, and ViaSat. Non-satellite providers include Frontier, DirectTV, Spectrum Cable, and DishTV. Satellite internet providers include ViaSat. These services are privately operated and offered to each location in the City for a fee defined by the provider.

4.11.3 Regulatory Setting

4.11.3.1 Federal Regulations

There are no federal policies or regulation applicable to the proposed project.



4.11.3.2 State Regulations

Water Supply Assessment. California Public Resources Code (PRC) Section 21151.9 requires that any proposed “project,” as defined in Section 10912 of the Water Code, prepare a Water Supply Assessment in compliance with Water Code Section 10910, et seq. Water Code Section 10910 et seq. outlines the necessary information and analysis that must be included in an EIR to ensure that a proposed land development has a sufficient water supply to meet existing and planned water demand over a 20-year horizon.

According to Water Supply Assessment requirements, a “project” is defined as any of the following:

- A residential development of more than 500 dwelling units;
- A shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet (sf) of floor space;
- A commercial office building employing more than 1,000 persons or having more than 250,000 sf of floor space;
- A hotel or motel, or both, having more than 500 rooms;
- An industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 sf of floor area;
- A mixed-use project that includes one or more of the projects specified above; and
- A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling-unit project.

If a public water system has fewer than 5,000 service connections, a “project” means any proposed residential, business, commercial, hotel or motel, or industrial development that would account for an increase of 10 percent or more in the number of the public water system’s existing service connections, or a mixed-use project that would demand an amount of water equivalent to, or greater than, the amount of water required by residential development that would represent an increase of 10 percent or more in the number of the public water system’s existing service connections.

Although the proposed project would facilitate future residential development of more than 500 dwelling units, the proposed project itself does not involve any development. The proposed project is a programmatic update to the City’s General Plan, Lincoln Avenue Specific Plan (LASP), Cypress Town Center and Commons Specific Plan 2.0 (CCTC Specific Plan), Cypress Business and Professional Center Specific Plan (CBPC Specific Plan), and Zoning Ordinance that would not directly result in physical development. As such, the proposed project does not meet the definition of a “project” pursuant to Water Code Section 10912, and a Water Supply Assessment is not required for the proposed project.



Assembly Bill 341. Assembly Bill (AB) 341 extends the waste diversion requirements established under the California Integrated Waste Management Act of 1989 to the year 2020. In 1989, the California Legislature adopted the California Integrated Waste Management Act of 1989, which is administered by CalRecycle (formerly known as the California Integrated Waste Management Board) and requires each city, county, and regional agency to develop a source reduction and recycling element of an integrated waste management plan. Each adopted source reduction and recycling element was required to demonstrate the diversion of 50 percent of all solid waste from landfill disposal or transformation by January 1, 2000. Annual progress reports were required to be filed with the State Legislature that included specified information regarding the act. AB 341 further establishes the policy goal of the State that not less than 75 percent of solid waste generated be source-reduced, recycled, or composted by the year 2020. AB 341 requires CalRecycle, by January 1, 2014, to provide a report to the Legislature that provides strategies to achieve that policy goal and also includes other specified information and recommendations in addition to the annual progress report.

Title 24, California Building Code. Energy consumption by new buildings in California is regulated by the Building Energy Efficiency Standards, embodied in Title 24 of the California Code of Regulations (CCR), known as the California Building Code (CBC). The CEC first adopted the Building Energy Efficiency Standards for Residential and Nonresidential Buildings in 1978 in response to a legislative mandate to reduce energy consumption in the State. The CBC is updated every 3 years. The 2022 Building Energy Efficiency Standards became effective on January 1, 2023. The efficiency standards apply to both new construction and rehabilitation of both residential and non-residential buildings, and regulate energy consumed for heating, cooling, ventilation, water heating, and lighting. The building efficiency standards are enforced through the local building permit process. Local government agencies may adopt and enforce energy standards for new buildings, provided these standards meet or exceed those provided in CCR Title 24.

4.11.3.3 Regional Regulations

Metropolitan Water District of Southern California 2020 Urban Water Management Plan. Metropolitan Water District of Southern California's (MWD) 2020 Urban Water Management Plan (UWMP) lists and describes the various uses, demand, supplies, target reductions, and compliance measures for 26 member agencies. These include 14 cities, 11 municipal water districts, and one county water authority serving approximately 5,200 square miles including portions of Los Angeles, Orange, Riverside, San Bernardino, San Diego, and Ventura Counties. The 2020 Regional UWMP found that under the current supply demands for a multiple-dry-year scenario (i.e., drought conditions), MWD would have sufficient supply to meet the projected growing demand for water from 2025 to 2045. MWD is currently working to develop programs to increase its water supply and create a large surplus during multiple-dry-year scenarios to ensure that water demands will still be addressed during emergency drought situations.



Municipal Water District of Orange County 2020 Urban Water Management Plan. The region served by the Municipal Water District of Orange County (MWDOC) is located in Orange County, California, and includes 28 cities (including the City of Cypress) and water districts, referred to as MWDOC member agencies. MWDOC’s 2020 UWMP documents information on all sources of water supplies for the region—imported water, groundwater, surface water, recycled water, and wastewater—as a summary of information for regional planning. The plan concludes that the MWDOC service area will have sufficient existing and planned supplies to meet full service demands under every water-year hydrologic scenario from 2020 through 2025. The plan also evaluates each source of water in the region. The resource mix for meeting total demand includes local groundwater, recycled water, surface water, and imported water from MWD. The plan documents MWDOC’s cooperative efforts with its member agencies in developing local supplies and finds that in the region the percentage of its supply from each source will remain approximately the same for the next 25 years, with 30 percent of its supplies from imported water and 70 percent of its supplies from local sources in 2040, even with projected growth occurring.

4.11.3.4 Local Regulations

Golden State Water Company 2020 Urban Water Management Plan (West Orange). GSWC published its 2020 UWMP for the GSWC Los Alamitos West Orange Service Area, which outlines how GSWC will provide customers with a reliable supply of drinking water for the next 30 years. The 2020 UWMP provides the California Department of Water Resources with information regarding present and future water resources and demands and provides an assessment of GSWC’s water resource needs. The 2020 UWMP utilizes factors that were evaluated in ensuring supply reliability in the MWDOC’s 2020 UWMP and the MWD’s 2020 UWMP.

The UWMP conducts a supply assessment to meet the projected growing demand in its Los Alamitos West Orange Service Area. The UWMP analyzes water supply during multiple-dry-year scenarios to ensure that water demands will still be addressed during emergency drought situations. The UWMP includes these multiple-dry-year scenarios in its analysis of future water demand.

City of Cypress Municipal Code. The Cypress Municipal Code includes the following requirements that would apply to the proposed project related to the provision of utilities:

- **Section 12-31 (Required Diversion Rates)** of the City’s Municipal Code requires that the applicant for a covered project shall divert, at a minimum, the percentage of construction and demolition debris as specified by the California Green Building Standards.
- **Section 5-1 (California Building Codes—Adopted)** adopts the 2022 California Green Building Standards Code, 2022 Edition (Title 24). Generally, the intent of Title 24 is to provide efficiency standards for new construction and the rehabilitation of both residential and nonresidential buildings, including building energy consumption, water conservation, and operational efficiencies. Title 24 regulates building energy consumption for heating, cooling, ventilation, water heating, and lighting with regard to both electricity and natural gas, while also regulating water consumption through the installation of efficient plumbing fixtures.



4.11.4 Thresholds of Significance

The thresholds for utilities and service system impacts used in this analysis are consistent with Appendix G of the *State CEQA Guidelines* and the City's *Initial Study/Environmental Checklist*. In determining whether the proposed project may have a significant impact with respect to utilities and service systems, it is necessary to consider whether it would:

- Threshold 4.11.1:** 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?
- Threshold 4.11.2:** Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?
- Threshold 4.11.3:** 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?
- Threshold 4.11.4:** 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?
- Threshold 4.11.5:** Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

As discussed in Section 4.19 of the Initial Study prepared for the proposed project (Appendix A), the proposed project would result in less than significant impacts regarding compliance with federal, State, and local management and reduction statutes and regulations related to solid waste (Threshold 4.11.5). Therefore, this topic is not further addressed below.

4.11.5 Project Impacts

- Threshold 4.11.1:** **Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

Less Than Significant Impact. The proposed project includes a programmatic update to the City's General Plan, the LASP, CTCC Specific Plan, CBPC Specific Plan, and Zoning Ordinance to bring the General Plan and Zoning Ordinance into conformity with the City's recently adopted 2021–2029 Housing Element and would not directly result in physical development.

The City's housing needs allocation for the planning period between 2021 and 2029 was established by SCAG at 3,936 housing units. The City identified a potential rezoning scenario in the 2021–2029 Housing Element which divides the City's RHNA between the CTCC Specific Plan, CBPC Specific Plan area and LASP area. The proposed project would accommodate an additional 2,314 housing units at



the opportunity sites. In addition to the 1,946 housing units already accommodated under existing zoning within the City, the proposed project would increase the residential development capacity in the City to a total of 4,260 housing units. According to the 2017 American Housing Survey (AHS), the average household size in structures that have 50 or more housing units (the highest housing density type evaluated in the AHS) in the Los Angeles-Long Beach-Anaheim Metropolitan Statistical Area (MSA) was 1.99 persons. As such, the construction of the 2,314 housing units that would be facilitated under the proposed project would result in a net increase of approximately 4,605 persons.

4.11.5.1 Water

The GSWC Los Alamitos West Orange Service Area 2020 UWMP states that annual water use in its service area is expected to be 15,759 acre-feet by 2045. In addition, the 2020 UWMP states that total water supplies available for the service area in 2045 would be 23,645 acre-feet. According to CalEEMod projections, future residential development facilitated by the proposed project would result in approximately 86,834,354 gallons per year (gpy) or 267 acre-feet per year (afy) of indoor water use. The proposed project's anticipated water usage accounts for 1.7 percent of the estimated water demand and 1.1 percent of the total available water supplies in the service area for 2045. This represents a minimal increase in water demand within the GSWC Los Alamitos West Orange Service Area.

Additionally, some of the 2,314 housing units that would be facilitated under the proposed project would replace existing urban uses that currently use water. Any future projects implemented in accordance with the proposed project would be required to adhere to the General Plan, provide required development impact fees, and comply with applicable development regulations pertaining to water. As a part of the development review process, all future projects would be required to demonstrate that existing public utilities would be sufficient to serve the future projects' needs.

As such, the proposed project would not require the relocation or construction of new or expanded water facilities or infrastructure and impacts would be less than significant. No mitigation is required.

4.11.5.2 Wastewater

The Orange County Sanitation District (OCS D) is responsible for the provision of wastewater treatment facilities that serve the opportunity sites. As indicated above, the OCS D has a capacity to treat 188 million gallons of wastewater per day from residential, commercial, and industrial sources at two plants: Reclamation Plant No. 1 in Fountain Valley and Treatment Plant No. 2 in Huntington Beach. Reclamation Plant No. 1 has a primary treatment capacity of 208 mgd,²⁷ and is running under capacity at approximately 120 mgd.²⁸ Treatment Plant No. 2 has a primary treatment capacity of 168 mgd and currently receives 59 mgd.²⁹ The future residential development facilitated by the

²⁷ OCS D. 2019b. *Budget Update Fiscal Year 2019-2020*. Website: <https://www.ocsd.com/Home/ShowDocument?id=28411> (accessed May 12, 2023).

²⁸ Ibid.

²⁹ OCS D. n.d.-b. *Facts and Key Statistics Webpage*. Website: <https://www.ocsd.com/services/regional-sewer-service> (accessed May 12, 2023).



proposed project is anticipated to generate approximately 240 acre-feet of wastewater annually, or 214,116 gallons of wastewater per day.³⁰ This accounts for 0.11 percent of OCSD’s daily capacity, 0.10 percent of the current capacity of Reclamation Plant No. 1, and 0.13 percent of the current capacity of Reclamation Plant No. 2. Consequently, anticipated wastewater generation by the proposed project is negligible (less than 1 percent) compared to the available capacities of OCSD, Reclamation Plant No. 1, and Treatment Plant No. 2.

Additionally, some of the 2,314 housing units that would be facilitated under the proposed project would replace existing urban uses that currently generate wastewater and are assumed in OCSD’s wastewater generation projections. Any future projects implemented in accordance with the proposed project would be required to adhere to the General Plan, provide required development impact fees, and comply with applicable development regulations pertaining to wastewater treatment. As a part of the development review process, all future projects would be required to demonstrate that existing public utilities would be sufficient to serve the future projects’ needs. In addition, as requested by OCSD, future projects implemented in accordance with the proposed project would be required to provide project-specific impact analysis via sewer study to demonstrate the adequacy of existing wastewater facilities to properly transport and treat wastewater flows generated by the future project.³¹

As such, the proposed project would not require the relocation or construction of new or expanded wastewater facilities or infrastructure and impacts would be less than significant. No mitigation is required.

4.11.5.3 Stormwater/Drainage

Any future projects implemented in accordance with the proposed project which disturb more than 1 acre of soil would comply with the requirements of the Construction General Permit and would include the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would include construction Best Management Practices (BMPs) to control and direct on-site surface runoff and would include detention facilities, if required, to ensure that stormwater runoff from the construction site would not exceed the capacity of the stormwater drainage systems. If applicable, a SWPPP would also detail Erosion Control and Sediment Control BMPs to be implemented during project construction to minimize erosion and retain sediment on site. If a future project would disturb less than 1 acre of soil, it would be subject to the requirements of Section 5.106 of the 2022 California Green Building Standards Code (CALGreen Code). The CALGreen Code requires projects that disturb less than 1 acre of soil and that are not part of a larger common plan to comply with the local municipal code and/or implement a combination of erosion and sediment control and good housekeeping BMPs to prevent pollution of stormwater runoff during construction activities.

The new development allowed under the proposed project would also comply with the Orange County MS4 Permit, which requires the preparation of a Final Water Quality Management Plan

³⁰ In the absence of an official wastewater generate rate, wastewater can be reasonably assumed to be 90 percent of the water use.

³¹ Personal communication with L Kevin Hadden, Principal Staff Analyst at OCSD on June 30, 2023.



(WQMP) and implementation of operational BMPs to target and reduce pollutants of concern in stormwater runoff from project sites. Compliance with the Orange County MS4 Permit would reduce operational impacts related to surface water quality standards, waste discharge requirements, and/or degradation of water quality to a less than significant level, and no mitigation is required.

Additionally, some of the 2,314 housing units that would be facilitated under the proposed project would replace existing urban uses that currently contribute to stormwater flows and given that existing urban uses are probably older structures and not built to current stormwater standards there could be a net benefit. Any future projects implemented in accordance with the proposed project would be required to adhere to the General Plan, provide required development impact fees, and comply with applicable development regulations pertaining to stormwater drainage. As a part of the development review process, all future projects would be required to demonstrate that existing public utilities would be sufficient to serve the future projects' needs.

As such, the proposed project would not require the relocation or construction of new or expanded stormwater facilities or infrastructure and impacts would be less than significant. No mitigation is required.

4.11.5.4 Electric Power

The City is within the service territory of Southern California Edison (SCE), which provides services through a grid of transmission lines and related facilities. As discussed previously, according to the California Energy Commission (CEC), total electricity consumption in the SCE service area in 2021 was 81,129 GWh³² and total electricity consumption in Orange County in 2021 was 18,932 GWh (7,272 GWh for the residential sector and 11,660 GWh for the non-residential sector).³³ Based on the CalEEMod outputs for the proposed project, the estimated electricity demand associated with the operation of the new residential development allowed under the proposed project is approximately 8,482,740 kilowatt-hours (kWh) per year. Therefore, operation of the future residential development facilitated by the proposed project would increase annual electricity consumption in the SEC service area and Orange County by approximately 0.01 and 0.04 percent, respectively. Consequently, anticipated electricity consumption by the proposed project is negligible (less than 1 percent) compared to the total consumption of the SCE service area and Orange County.

Additionally, some of the 2,314 housing units that would be facilitated under the proposed project would replace existing urban uses that are older structures not built to current Title 24 Energy Efficiency Standards, all of which consume electricity, thereby likely decreasing any net gain in electricity consumption. Any future projects implemented in accordance with the proposed project would be required to adhere to the General Plan, provide required development impact fees, and comply with applicable development regulations pertaining to electric power. As a part of the

³² CEC. n.d.-b. *Electricity Consumption by Entity*. Website: <http://www.ecdms.energy.ca.gov/elecbyutil.aspx> (accessed May 11, 2023)

³³ CEC. n.d.-a. *Electricity Consumption by County*. Website: <http://www.ecdmsenergy.ca.gov/elecbycounty.aspx> (accessed May 11, 2023).



development review process, all future projects would be required to demonstrate that existing public utilities would be sufficient to serve the future projects' needs.

As such, the proposed project would not require the relocation or construction of new or expanded electrical facilities or infrastructure and impacts would be less than significant. No mitigation is required.

4.11.5.5 Natural Gas

Southern California Gas Company (SoCalGas), the service provider for the City, serves approximately 21.1 million customers in a 24,000 sq mi service territory.³⁴ According to the CEC, total natural gas consumption in the SoCalGas service area in 2021 was 5,101 million therms (2,261 million therms for the residential sector and 937 million therms for the commercial sector)³⁵ and total natural gas consumption in Orange County in 2021 was 580 million therms (362 million therms for the residential sector and 218 therms for the non-residential sector).³⁶ CalEEMod was used to calculate the approximate annual natural gas associated with future housing development under the proposed project. Based on the CalEEMod outputs for the proposed project, the estimated potential increase in natural gas demand at the opportunity sites is anticipated to be approximately 25,701,324 thousand British thermal units (kBtu) per year, or approximately 257,075 therms per year. Therefore, operation of the new residential development allowed under the proposed project would increase annual consumption in the SoCalGas service area and Orange County by approximately 0.005 and 0.04 percent, respectively. Consequently, the anticipated natural gas consumption by the proposed project would be negligible (less than 1 percent) compared to the total consumption of the SoCalGas service area and Orange County. The proposed project would not require the construction of any physical improvements related to the provision of natural gas service that would result in significant environmental impact.

Additionally, some of the 2,314 housing units that would be facilitated under the proposed project would replace existing urban uses that are older structures not built to current Title 24 Energy Efficiency Standards, several of which consume natural gas, thereby likely decreasing the net gain in natural gas consumption. Any future projects implemented in accordance with the proposed project would be required to adhere to the General Plan, provide required development impact fees, and comply with applicable development regulations pertaining to natural gas. As a part of the development review process, all future projects would be required to demonstrate that existing public utilities would be sufficient to serve the future projects' needs.

As such, the proposed project would not require the relocation or construction of new or expanded natural gas facilities or infrastructure and impacts would be less than significant. No mitigation is required.

³⁴ SoCalGas. n.d. Company Profile: About SoCalGas. Website: <https://www.socalgas.com/about-us/company-profile> (accessed May 11, 2023)

³⁵ CEC. n.d.-d. *Gas Consumption by Entity*. Website: <https://ecdms.energy.ca.gov/gasbyutil.aspx> (accessed May 11, 2023).

³⁶ CEC. n.d.-c. *Gas Consumption by County*. Website: <http://www.ecdms.energy.ca.gov/gasbycounty.aspx> (accessed May 11, 2023).



4.11.5.6 Telecommunication Facilities

Telephone, television, and internet services are offered by a variety of providers in the City. Any future projects that would be developed in accordance with the proposed project would be responsible for constructing adequate tele-communication facility extensions on their respective project sites. The construction and expansion of these facilities would occur on site during the site preparation and earthwork phase and are not expected to impact any telephone, cable, or internet services offsite that serve the surrounding areas. Additionally, telecommunication facilities are generally installed concurrently with utility expansions and impacts associated with the expansion of telecommunications facilities are already considered in the air quality, noise, and construction traffic analysis. Therefore, the project impacts associated with the relocation or construction of new or expanded telecommunication facilities and impacts would be less than significant. No mitigation is required.

Threshold 4.11.2: Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. As indicated above, the proposed project consists of a programmatic update to the City's General Plan, LASP, CTCC Specific Plan, CBPC Specific Plan, and Zoning Ordinance to bring the General Plan and Zoning Ordinances into conformity with the City's recently adopted 2021–2029 Housing Element and would not directly result in physical development. The City's housing needs allocation for the planning period between 2021 and 2029 was established by SCAG at 3,936 housing units. The City identified a potential rezoning scenario in the 2021–2029 Housing Element which divides the City's RHNA between the CTCC Specific Plan, CBPC Specific Plan area and Lincoln Avenue Specific Plan area. The proposed project would accommodate an additional 2,314 housing units at the opportunity sites. In addition to the 1,946 housing units already accommodated under existing zoning within the City, the proposed project would increase the residential development capacity in the City to a total of 4,260 housing units.

According to water demand factors included in the CalEEMod emissions model, future development allowed under the proposed project is estimated to demand approximately 86,834,354 gallons per year (gpy) or 267 afy of indoor water use. Therefore, the estimated increase in water demand associated with the new development proposed as part of the project would represent approximately 1.7 percent of the GSWC's anticipated water demand in 2045. Additionally, some of the 2,314 housing units that would be accommodated with implementation of the proposed project would replace existing uses that currently are assumed in the water use projections. The project-generated increase in water demand would be considered less than significant and would fall within existing capacity and available supply.

According to the 2020 UWMP, GSWC's available water supply would meet the future projected demand for normal year demands from 2025 through 2045. GSWC's Los Alamitos West Orange Service Area has a diverse water supply portfolio that allows GSWC to conjunctively use surface and groundwater assets. Water supply reliability is a result of the projected reliability of MWDOC, a member agency of MWD, which expects to provide reliable imported water supplies, OCWD management of the Orange County Groundwater Basin to ensure reliability, and conservation



derived supply. Groundwater imported water from MWDOC, and the small amount of recycled water delivered within the service area by the City of Cerritos and the City of Seal Beach are all resilient during dry conditions and GSWC Los Alamitos West Orange Service Area is therefore not faced with shortages during normal or dry years. In addition, as previously discussed, the residential units facilitated by the proposed project are anticipated to use 1.1 percent of the total available water supplies in the service area for 2045. This represents a minimal increase in water demand within the GSWC Los Alamitos West Orange Service Area.

Therefore, the proposed project would not result in insufficient water supplies during normal, dry, and multiple dry years, and adequate water supply would be available to accommodate the future residential development on the opportunity sites facilitated by the proposed project. The proposed project would increase demand for water supplies; however, the GSWC would have sufficient water supplies to serve the proposed project. Therefore, the proposed project would result in **less than significant** impacts related to water supplies. No mitigation is required.

Threshold 4.11.3: Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?

Less Than Significant Impact. As discussed above, sewage from the City is diverted to either Reclamation Plant No. 1 in Fountain Valley or Treatment Plant No. 2 in Huntington Beach. Reclamation Plant No. 1 has a primary treatment capacity of 208 mgd,³⁷ and is running under capacity at approximately 120 mgd.³⁸ Treatment Plant No. 2 has a primary treatment capacity of 168³⁹ mgd and currently receives 59 mgd.⁴⁰ The proposed project is anticipated to generate 214,116 gpd of wastewater. However, the 214,116 gpd of wastewater generated by the proposed project would only represent a small fraction of the primary daily treatment capacity of Reclamation Plant No. 1 and Reclamation Plant No. 2 (0.10 percent and 0.13 percent, respectively). Additionally, through its Capital Improvement Program, the OCSD strives to continue maintaining its facilities at optimal levels by planning, designing, and preparing for future demand by developing Facilities and Biosolids Master Plans that address 20-year planning horizons.⁴¹ Through these long-range planning activities, the OCSD would be able to accommodate the growth in demand for wastewater treatment generated by the proposed project and other projects in its service area. Therefore, the proposed project would not result in a significant contribution to demands on the treatment capacity of Reclamation Plant No. 1 or Treatment Plant No. 2. Additionally, fees required by the OCSD would sufficiently offset potential impacts generated by the proposed project. Furthermore,

³⁷ OCSD. 2019b. *Budget Update Fiscal Year 2019-2020*. Website: <https://www.ocsd.com/Home/ShowDocument?id=28411> (accessed May 12, 2023).

³⁸ Ibid.

³⁹ Ibid.

⁴⁰ OCSD. n.d.-b. *Facts and Key Statistics Webpage*. Website: <https://www.ocsd.com/services/regional-sewer-service> (accessed May 12, 2023).

⁴¹ OCSD. 2019c. *Capital Improvement Program Fiscal Year 2017/2018*. Website: <https://www.ocsd.com/Home/ShowDocument?id=26170> (accessed January 2024).



some of the 2,314 housing units that would be facilitated under the proposed project would replace existing urban uses that currently generate wastewater.

Therefore, the proposed project would result in less than significant impacts related to the wastewater treatment capacity and no mitigation is required.

Threshold 4.11.4: Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. Solid waste from future residential development allowed under the proposed project would be required to comply with State and local solid waste reduction, diversion, and recycling policies and regulations. According to CalEEMod calculations, the future residential development facilitated by the proposed project would generate approximately 1,711 tons of solid waste per year. Currently, OCWR maintains and operates three Class III sanitary landfills including the Frank R. Bowerman Landfill, Olinda Alpha Landfill, and Prima Deshecha Landfill. The Frank R. Bowerman Landfill is currently permitted by the California Department of Resources, Recycling, and Recovery (CalRecycle) to receive a maximum of 11,500 tons per day (tpd) of waste, with a currently annual average of 8,500 tpd. The Olinda Alpha Landfill is currently permitted by the CalRecycle to receive a maximum of 8,000 tpd of waste, but currently receives an average of approximately 7,000 tpd. The Prima Deshecha Landfill is currently permitted by CalRecycle to receive 4,000 tpd. The additional solid waste generation of 1,711 tons of solid waste per year, or 4.69 tpd, facilitated by the proposed project represents 0.04 percent, 0.06 percent, and 0.1 percent of the daily permitted tonnage of the Frank R. Bowerman Landfill, Olinda Alpha Landfill, and Prima Deshecha Landfill, respectively. Consequently, anticipated solid waste generation by the proposed project is negligible (substantially less than 1 percent) compared to the total amount of solid waste received by the three landfills. The proposed project would not require the construction of any physical improvements related to the provision of solid waste disposal that would result in significant environmental impacts and the OCWR solid waste disposal system would have adequate capacity to serve the proposed project. Furthermore, some of the 2,314 housing units that would be facilitated under the proposed project would replace existing urban uses, most of which currently generate solid waste. Therefore, impacts related to solid waste generation from any future projects developed in accordance with the proposed project would be less than significant. No mitigation is required.

4.11.6 Level of Significance Prior to Mitigation

The proposed project would result in less than significant impacts related to utilities and service systems.

4.11.7 Regulatory Compliance Measures and Mitigation Measures

4.11.7.1 Regulatory Compliance Measures

No regulatory compliance measures or mitigation measures are required.



4.11.7.2 Mitigation Measures

No mitigation measures are applicable to the proposed project.

4.11.8 Level of Significance after Mitigation

The proposed project would not result in any significant impacts to utilities or service systems. No mitigation is required.

4.11.9 Cumulative Impacts

The purpose of this section is to evaluate any additional incremental impact that the proposed project is likely to cause over and above the combined impacts of recently approved and proposed projects in the City. The impact area used to assess potential cumulative utilities and service systems impacts is the City of Cypress because the proposed project would affect utilities and service systems within the City. As discussed in Chapter 4.0, Existing Setting, Environmental Analysis, Impacts, and Mitigation Measures, the list of projects considered for cumulative impacts is based upon the City's General Plan 2045 build-out assumptions.

As stated above, the proposed project includes a programmatic update to the City's General Plan, Lincoln Avenue Specific Plan, CTCC Specific Plan, CBPC Specific Plan, and Zoning Ordinance to bring the General Plan and Zoning Ordinances into conformity with the City's recently adopted 2021–2029 Housing Element and would not directly result in physical development. Any future projects implemented in accordance with the proposed project would be required to adhere to the General Plan, provide required development impact fees, and comply with applicable development regulations pertaining to water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. Additionally, adequate water supply is available to accommodate the additional housing units allowed under the proposed project. Solid waste and wastewater generated by the new housing development allowed under the proposed project could be accommodated with existing infrastructure and would not lead to a significant increase that would alter the capacity of the existing solid waste and wastewater infrastructure set in place. Any future projects would be required to comply with existing and future statutes and regulations, including waste diversion programs mandated by City, State, and federal law.

LSA developed the General Plan build-out assumptions by reviewing the land use assumptions in the eight Transportation Analysis Zones (TAZs) where growth was anticipated to occur due to potential growth as provided in the General Plan and or approved projects in a related planning document. The Orange County Transportation Analysis Model (OCTAM) TAZs contained household data for 2016. The eight TAZs were updated to reflect the City's 2045 anticipated build out. Table 4.A, General Plan Cumulative Growth Assumptions, indicates that the City expects build-out of approximately 2,687 additional households (or housing units) within the Lincoln Avenue Specific Plan and the Los Alamitos Race Course Super Block between 2016 and 2045 under the baseline General Plan build-out scenario. As such, implementation of the proposed project in conjunction with the build out of the additional households could result in a cumulatively significant impact to utility facilities and capacity. However, developers of future residential development projects implemented in accordance with the proposed project, as well as the remaining projects associated with the City's General Plan 2045 build-out assumptions, would be required to analyze potential



impacts to utilities systems, ensure that utility providers would have adequate capacity and supply to serve the residential projects as well as existing conditions, and would be required to comply with existing and future statutes and regulations, including waste diversion programs mandated by City, State, and federal law. Therefore, the impacts from the proposed project would not be considered cumulatively considerable.



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5.0 ALTERNATIVES

5.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that an Environmental Impact Report (EIR) include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant impacts of the project, and evaluate the comparative merits of the alternatives” (*State CEQA Guidelines*, Section 15126.6). This chapter identifies potential alternatives to the 2021–2029 Cypress Housing Element Implementation Project (proposed project), evaluates the potential impacts of each alternative, and compares the potential impacts of each alternative against the proposed project’s impacts, as required by CEQA.

Key provisions of the *State CEQA Guidelines* on alternatives (Section 15126.6[b] through [f]) are summarized below to explain the foundation and legal requirements for the alternatives analysis in the EIR:

- The discussion of alternatives shall focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly (15126.6[b]).
- The specific alternative of ‘no project’ shall also be evaluated along with its impact (15126.6[e][1]). The ‘no project’ analysis shall discuss the existing conditions at the time the Notice of Preparation is published, and at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (15126.6[e][2]).
- The range of alternatives required in an EIR is governed by the ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent) (15126.6[f]).
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (15126.6[f][2][A]).



- If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR. For example, in some cases there may be no feasible alternative locations for a geothermal plant or mining project which must be in close proximity to natural resources at a given location (15126.6[f][2][B]).
- An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative (15126.6[f][3]).

Pursuant to the guidelines stated above, a range of alternatives to the proposed project is considered and evaluated in this Draft Program EIR (PEIR). These alternatives were developed in the course of project planning and environmental review. The discussion in this section provides:

1. A description and analysis of impacts for each of the alternatives considered;
2. Comparative analysis of each alternative that focuses on the potentially significant unavoidable environmental impacts of the proposed project (the purpose of this analysis is to determine whether alternatives are capable of eliminating or reducing the significant environmental impacts of the project to a less than significant level); and
3. Conclusions regarding the alternative's: (1) ability to avoid or substantially lessen the significant unavoidable impacts of the project; (2) ability to attain the project objectives (as stated below); and (3) merits compared to the merits of the proposed project.

5.2 PROPOSED PROJECT

5.2.1 Project Characteristics

The proposed project is a programmatic update to the City's General Plan, the Lincoln Avenue Specific Plan (LASP), the Cypress Town Center and Commons Specific Plan 2.0 (CTCC Specific Plan), the Cypress Business and Professional Center Specific Plan (CBPC Specific Plan), and the Zoning Ordinance and would not directly result in physical development. The proposed project includes amendments to the City's Zoning Ordinance and an update of the City's General Plan to reflect the 2021–2029 Housing Element adopted on June 27, 2022. The proposed project would update the City's General Plan and Zoning Ordinance, and the LASP to be "internally consistent," meaning any and all conflicts must be acknowledged and resolved. In order for the 2021–2029 Housing Element to be internally consistent with the Zoning Ordinance and Specific Plans, the proposed project would rezone the opportunity sites and/or amend the General Plan to accommodate the City's housing needs, as set forth in the 2021–2029 Housing Element.

The 2021–2029 Housing Element identifies several adequate sites that are able to accommodate the development of up to 1,946 new housing units (504 of which have already been entitled), but the City has a large unaccommodated housing need of 1,990 units in order to meet its Regional Housing Needs Assessment (RHNA) allocation of 3,936 units. The City has identified several opportunity sites that are candidates for future housing development. The City identified two different potential rezoning scenarios in the 2021–2029 Housing Element, one of which was selected as the preferred scenario and has been identified as the proposed project in this Draft PEIR. The second rezoning scenario included in the 2021–2029 Housing Element will be evaluated as Alternative 2, below.



The proposed project divides the City’s RHNA between the CTCC Specific Plan, the CBPC Specific Plan area, and the LASP area. Located on the Los Alamitos Race Course site, the CTCC Specific Plan currently allows the development of residential units throughout seven land use districts which range in density from 8 dwelling units per acre (du/ac) to approximately 20 du/ac. As currently approved, the CTCC Specific Plan utilizes maximum density requirements in various districts as well as a maximum unit cap of 1,250 units in the CTCC Specific Plan area.¹ Under the proposed project, the majority of the maximum permissible residential densities in the CTCC Specific Plan would remain unchanged. However, the allowable residential density within several land use districts in the CTCC Specific Plan area would increase to up to 30 dwelling units per acre to accommodate an additional 676 additional units and the existing unit cap of 1,250 units would be removed. With these proposed changes, an estimated 1,791 units could be accommodated within the CTCC Specific Plan area, in addition to the 135-unit Belmont project currently under construction.

The proposed project also includes one opportunity site on Katella Avenue adjacent to the CTCC Specific Plan area (Site #115, 4955 Katella) in the CBPC Specific Plan. The CBPC Specific Plan area limits residential land uses to Senior Housing. The zoning on this parcel would be amended from a Professional Office/Hotel and Support Commercial zoning designation to allow residential densities of up to 60 du/ac, which would accommodate an estimated 321 units. The primary building on the site is a big box type structure which accommodates two tenants. One half of the building is occupied by a gym and the other half of the building is currently vacant (formerly an Office Depot).

Under the proposed project, the remaining RHNA sites would be accommodated within the LASP. The LASP currently allows for residential development at 30 du/ac within the RM-30 and Residential Mixed-Use districts. The proposed project would expand the maximum allowable density of 30 du/ac to the majority of the LASP area, increasing development potential by approximately 1,317 units. With these amendments, the LASP could accommodate a total of approximately 1,644 units.

Table 5.A, below, provides a summary of the proposed increases in residential development capacities on the opportunity sites under the proposed project.

Table 5.A: Proposed Project Summary

Specific Plan	Proposed Increase In Housing Unit Capacity
Lincoln Avenue Specific Plan (LASP)	1,317
Cypress Town Center and Commons Specific Plan 2.0 (CTCC Specific Plan)	676
Cypress Business and Professional Center Specific Plan (CBPC Specific Plan)	321
Total	2,314

Source: City of Cypress Planning Department (2023).

¹ While the existing residential unit cap within the CTCC Specific Plan is 1,250 units, the City has previously approved the 135-unit Belmont project, which has therefore been included as an entitled project. As a result, there are 1,115 remaining units that are permitted within the CTCC Specific Plan as currently adopted.



Overall, the proposed project would accommodate an additional 2,314 housing units at the opportunity sites. In addition to the 1,946 units already accommodated under existing zoning within the City, the proposed project would increase the residential development capacity in the City to a total of 4,260 housing units.

5.2.2 Project Objectives

The City has established the following intended objectives, which would aid decision-makers in their review of the project and its associated environmental impacts:

1. Provide consistency between the 2021–2029 Housing Element, the City’s General Plan, the LASP, the CTCC Specific Plan, the CBPC Specific Plan, and the City’s Zoning Ordinance.
2. Meet the City’s housing needs as identified in the Regional Housing Needs Assessment Requirement (3,936 new housing units).
3. Implement sustainable planning and development practices by creating compact new developments and walkable neighborhoods to minimize the City’s contribution to greenhouse gas emissions (GHGs) and energy usage.
4. Promote changes in land use and development that reflect changes in the regional economy. Promote land uses that transform now-vacant or under-utilized sites.
5. Provide high-quality housing in a variety of forms, sizes, and densities to serve the diverse population of the City.
6. Fulfill the intent of the voter approved Measure A, which approved the Cypress Town Center and Commons Specific Plan 2.0 (CTCC Specific Plan)

In addition to these objectives, the City’s Land Use and Circulation Elements contain numerous goals, implementation strategies, and policies to guide the use of land and circulation of the City. These citywide policies aim to provide a holistic and comprehensive guide for the City, whereas future projects facilitated by project approval would provide a refined direction for distinct areas within the City.

5.2.3 Significant Adverse Unavoidable Impacts of the Proposed Project

5.2.3.1 Air Quality

The proposed project would result in significant and unavoidable impacts relating to air quality. Specifically, the proposed project would result in significant and unavoidable long-term operational pollutant emissions, have the potential to conflict or obstruct implementation of applicable air quality plans under Indicator 1 (as detailed in Section 4.1, Air Quality, of this Draft PEIR), and expose sensitive receptors to substantial pollutant concentrations. Indicator 1 refers to whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or emission reductions in the Air Quality Management Plan (AQMP).



While Mitigation Measure MM AQ-1 would significantly reduce criteria air pollutant emissions generated during operational activities associated with the proposed project, there is currently not enough information to quantify emissions of specific project development that may occur under the proposed project. Without quantification to guarantee a less than significant finding, future development projects on the opportunity sites may still exceed the South Coast Air Quality Management District's (SCAQMD) regional significance thresholds. Therefore, operation of the proposed project would result in a significant impact related to a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard. In addition, because information regarding operational characteristics of future specific development projects and the associated emissions cannot be determined at the time of this analysis, cumulative growth within the City could result in potential toxic air contaminant (TAC) health risks that could cumulatively contribute to elevated health risks in the City. Therefore, in an abundance of caution, the proposed project's potential to expose sensitive receptors to substantial pollutant concentrations impacts would be considered significant and unavoidable.

5.3 ALTERNATIVES INITIALLY CONSIDERED BUT REJECTED FROM FURTHER CONSIDERATION

Section 15126.6(c) of the *State CEQA Guidelines* suggests that EIRs identify any alternatives that were considered by the Lead Agency but were rejected during the scoping process and briefly explain the reasons underlying the Lead Agency's determination. In evaluating an appropriate range of alternatives to the proposed project, a No Project Alternative was considered and rejected by the City of Cypress (City).

The following is a discussion of the No Project Alternative considered during the environmental review process and the reasons it was not selected for detailed analysis in this Draft PEIR.

5.3.1 No Project Alternative

In accordance with *State CEQA Guidelines* Section 15126.6, the purpose of describing and analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The No Project Alternative would not provide accommodation for the City's RHNA allocation, and the population would generally remain at existing levels due to the City's relatively built out nature. Other than future build out consistent with the existing General Plan, no alterations to the City would occur. None of the impacts of the proposed project, adverse or beneficial, would occur. Most notably, the City would not be able to meet its housing obligations as defined by the State RHNA allocations. The No Project Alternative would be the same as existing conditions, which were described in the environmental setting section for each environmental topic.

Local jurisdictions are required by State law (Government Code Section 65580 et seq.) to plan for their fair share of projected housing construction needs in their region. Housing unit construction goals are set by the State Department of Housing and Community Development and allocated to cities through regional planning agencies such as the Southern California Association of Governments (SCAG). This is called the RHNA. Future housing need refers to the proportion of the



region’s future housing needs allocated to a community. Since 1969, California has required that all local governments (cities and counties) adequately plan to meet the housing needs of everyone in the community. California’s local governments meet this requirement by adopting housing plans as part of their “general plan” (also required by the State). General plans serve as the local government’s “blueprint” for how the city and/or county will grow and develop. In order to create a housing plan (aka Housing Element) showing that it could meet the local housing needs, a jurisdiction must first know how much housing for which it must plan. This is determined by a process called the RHNA.

The RHNA prepared by SCAG defines the housing unit goals for the region. The City’s fair share for the planning period between 2021, and 2029, (the current adopted RHNA period) was established by SCAG at 3,936 units. The RHNA target number was based on projected household growth and the resulting need for construction of additional housing units allocated over an 8-year planning period (2021–2029). Housing Element law mandates that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community. The law recognizes that in order for the private market to adequately address housing needs and demand, local governments must adopt land use plans and regulatory systems that provide opportunities for housing production. California’s housing element law requires that each city and county develop local housing programs to meet its “fair share” of existing and future housing needs. If the City fails to implement its housing element or adopts one that is inadequate, a court can order the City to halt all development until an adequate element is adopted or order approval of specific affordable housing developments. Therefore, this alternative may result in the State taking over control of the City’s Housing Element and implementing minimum zoning requirements to accommodate housing for a diversity of housing to meet the needs of multiple income categories. RHNA compliance by each jurisdiction has received significant oversight by the State Department of Housing and Community Development due to the ongoing housing crisis facing California. Therefore, a No Project Alternative is not possible.

5.4 ALTERNATIVES UNDER CONSIDERATION

Section 21100 of the Public Resources Code (PRC) and Section 15126 of the *State CEQA Guidelines* require an EIR to identify and discuss a No Project Alternative and a reasonable range of alternatives to the proposed project that would feasibly attain most of the basic objectives of the project and would avoid or substantially lessen any of the significant environmental impacts. Based on the criteria listed above, the following three alternatives have been determined to represent a reasonable range of alternatives that have the potential to feasibly attain most of the basic objectives of the proposed project but that may avoid or substantially lessen any of the significant impacts of the proposed project. Therefore, the alternatives considered in this PEIR include the following:

- **Reduced Intensity Alternative.** Under the Reduced Intensity Alternative, the existing residential density permitted in the CTCC Specific Plan would remain unchanged, and no additional units would be proposed in the CTCC Specific Plan area. The Reduced Intensity Alternative divides the proposed housing units between the CBPC Specific Plan area and LASP area. The Reduced Intensity Alternative proposes to accommodate 321 units in the CBPC Specific Plan area and 1,317 units in the LASP area. The Reduced Intensity Alternative also includes an Opportunity Site



located on the southeast corner of Orange Avenue and Grindlay Street, which would accommodate 30 moderate/above moderate-income units. In total, the Reduced Intensity Alternative proposes to accommodate an increase of 1,668 units at the opportunity sites (approximately 646 units less than the proposed project). In addition to the 1,946 units already accommodated under existing zoning within the City, implementation of the Reduced Intensity Alternative would increase the residential development capacity in the City to a total of 3,614 housing units.

- **Alternative 2: Lincoln Avenue Specific Plan Mixed Density.** Under Alternative 2, the existing residential densities permitted in the Cypress Town Center and Commons Specific Plan 2.0 (CTCC Specific Plan) would remain unchanged and would therefore be limited to the current maximum of 1,115 residential units. Alternative 2 instead proposes to vary densities within the LASP area between 30 du/ac and 60 du/ac to accommodate the development of approximately 2,378 new units (1,838 lower income units and 540 moderate/above moderate-income units). The Katella Avenue opportunity site in the PBP zone would be included in Alternative 2 as described under the proposed project. Alternative 2 also includes the opportunity site located on the southeast corner of Orange Avenue and Grindlay Street, which would accommodate 30 moderate/above moderate-income units. Overall, Alternative 2 would accommodate an additional 2,403 housing units at the opportunity sites. In addition to the 1,946 units already accommodated under existing zoning within the City, Alternative 2 would increase the residential development capacity in the City to a total of 4,349 housing units. If the City proceeds with Alternative 2, amendments to the LASP and the City's Zoning Ordinance would be undertaken through the normal public hearing process.
- **Race Course Avoidance Alternative.** Under the Race Course Avoidance Alternative, opportunity sites within the Cypress Town Center and Commons Specific Plan 2.0 (CTCC Specific Plan) would not include development on the areas where the essential features of the Los Alamitos Race Course, including the track, grandstand, and race course entry, are located. All other proposed project elements, including the opportunity sites within the CBPC Specific Plan area, LASP area, and at the Katella Avenue opportunity site, would remain unchanged. Implementation of the Race Course Avoidance Alternative would remove approximately 39.2 acres of CTCC Specific Plan area from future development under the proposed project and would reduce the total number of additional housing units within the CTCC Specific Plan area by approximately 153 additional units as compared to the proposed project. Overall, the Race Course Avoidance Alternative would accommodate an estimated 1,638 units within the CTCC Specific Plan area and approximately 2,161 housing units at the opportunity sites. With the removal of approximately 153 units within the CTCC Specific Plan area, implementation of the Race Course Avoidance Alternative would increase the residential development capacity in the City to a total of 4,107 housing units instead of the proposed project's increase of 4,260 housing units.

For the purpose of this analysis, it is assumed that all of the alternatives would comply with applicable federal, State, and local regulations, policies, and ordinances. The alternatives are further described below, and their potential impacts compared to those of the proposed project.



5.5 ALTERNATIVES ANALYSIS

5.5.1 Reduced Intensity Alternative

5.5.1.1 Description

As described previously, under the Reduced Intensity Alternative, the existing residential densities in the CTCC Specific Plan would remain unchanged, and no additional units would be proposed in the CTCC Specific Plan area. The Reduced Intensity Alternative divides the proposed housing units between the CBPC Specific Plan area and LASP area. The Reduced Intensity Alternative proposes to accommodate 321 units in the CBPC Specific Plan area and 1,317 units in the LASP area. The Reduced Intensity Alternative also includes an opportunity site located on the southeast corner of Orange Avenue and Grindlay Street, which would accommodate 30 moderate/above moderate-income units. In total, the Reduced Intensity Alternative proposes to accommodate 1,668 units and would result in a 646-unit reduction in housing units as compared to the proposed project.

5.5.1.2 Environmental Analysis

The Reduced Intensity Alternative would facilitate the development of 1,668 housing units under the 2021–2029 Housing Element at opportunity sites identified within the CBPC Specific Plan area, LASP area, and at Orange Avenue/Grindlay Street. According to the 2017 American Housing Survey (AHS), the average household size in structures that have 50 or more housing units (the highest housing density type evaluated in the AHS) in the Los Angeles-Long Beach-Anaheim Metropolitan Statistical Area (MSA) was 1.99 persons. The Reduced Intensity Alternative would facilitate the development of 1,668 housing units with a corresponding net increase of approximately 3,319 persons. As previously discussed, the Reduced Intensity Alternative would result in a 646-unit reduction in housing units as compared to the proposed project.

The proposed project would result in less than significant impacts relating to cultural resources, energy, greenhouse gas emissions, land use and planning, noise, population and housing, public services, transportation, tribal cultural resources, and utilities and service systems. The proposed project would also result in significant and unavoidable impacts relating to air quality as described above.

Because the Reduced Intensity Alternative would result in the accommodation of fewer residential units as compared to the proposed project, the Reduced Intensity Alternative would result in environmental impacts on energy, greenhouse gas emissions, population and housing, public services, and utilities and service systems that would be less than the proposed project. As the proposed project's impacts on these resource areas are less than significant, the Reduced Intensity Alternative's impacts on these resource areas would also be less than significant. In addition, impacts associated with land use and planning and tribal cultural resources would be less than significant and similar to the proposed project.

Impacts associated with air quality, noise, and transportation would also be less than the proposed project due to the accommodation of fewer residential units with the Reduced Intensity Alternative. However, the Reduced Intensity Alternative would still result in significant and unavoidable impacts on air quality, similar to the proposed project, due to the unavailability of information to quantify emissions of specific project development that may occur under the alternative.



Because the Reduced Intensity Alternative does not include the amendment of the CTCC Specific Plan to facilitate increased residential development, no substantial adverse change in the significance of the Los Alamitos Race Course with implementation of the Reduced Intensity Alternative as compared to existing conditions would occur. This impact would be similar to implementation of the proposed project, as both the Reduced Intensity Alternative and the proposed project would not have a significant impact on historic resources.

Implementation of the Reduced Intensity Alternative would still allow the development of residential uses within the LASP area, which would result in less than significant impacts on historic age structures located along the Lincoln Avenue corridor with implementation of in-depth historical analysis when future development is proposed at specific sites with potentially historical resources. Similar to the proposed project, the Reduced Intensity Alternative is a programmatic update to the City's General Plan, LASP, CBPC Specific Plan, and Zoning Ordinance and would not directly result in physical development. Consequently, the specific location and configuration of future development along Lincoln Avenue has not yet been determined and is not under consideration as part the programmatic update. Overall, impacts to cultural resources would be less than significant and slightly less than the proposed project.

As such, implementation of the Reduced Intensity Alternative would result in overall impacts that would be less than or similar to the proposed project.

5.5.1.3 Attainment of Project Objectives

The Reduced Intensity Alternative would either not meet project objectives or be inferior to the proposed project in meeting project objectives. The attainment of project objectives is discussed further below.

1. Provide consistency between the 2021–2029 Housing Element, the City's General Plan, the LASP, the CTCC Specific Plan, the CBPC Specific Plan, and the City's Zoning Ordinance.

The Reduced Intensity Alternative would not provide consistency between the 2021–2029 Housing Element, the City's General Plan, the LASP, the CTCC Specific Plan, the CBPC Specific Plan, and the City's Zoning Ordinance as the alternative would not implement either of the alternatives identified in the 2021–2029 Housing Element to the full extent. In addition, the Reduced Intensity Alternative would not meet the RHNA requirement to accommodate the development of up to 3,936 new housing units. As such, the Reduced Intensity Alternative would not meet Project Objective 1.

2. Meet the City's housing needs as identified in the Regional Housing Needs Assessment Requirement (3,936 new housing units).

As discussed above, the Reduced Intensity Alternative would not meet the City's housing needs as identified in the RHNA requirement (3,936 new housing units) as the alternative would facilitate the development of only 1,688 housing units. In addition to the 1,946 units already accommodated under existing zoning within the City, implementation of the Reduced Intensity Alternative would increase the residential development capacity in the City to a total of



3,614 housing units. This would be 349 units less than the RHNA requirement of 3,936 new housing units. As such, the Reduced Intensity Alternative would not meet Project Objective 2.

3. Implement sustainable planning and development practices by creating compact new developments and walkable neighborhoods to minimize the City’s contribution to greenhouse gas emissions (GHGs) and energy usage.

The Reduced Intensity Alternative would facilitate compact new development and walkable neighborhoods in the City; however, at a reduced scale compared to the proposed project. The reduction in housing units would decrease the extent of the compact new developments and walkable neighborhoods. As such, the Reduced Intensity Alternative would be inferior to the proposed project in meeting Project Objective 3.

4. Promote changes in land use and development that reflect changes in the regional economy. Promote land uses that transform now-vacant or under-utilized sites.

The Reduced Intensity Alternative would facilitate changes in land use and development that reflect changes in the regional economy and promote land uses that transform now vacant or under-utilized sites; however, at a reduced scale compared to the proposed project. The reduction in housing units would decrease the extent of the land use changes. As such, the Reduced Intensity Alternative would be inferior to the proposed project in meeting Project Objective 4.

5. Provide high-quality housing in a variety of forms, sizes, and densities to serve the diverse population of the City.

The Reduced Intensity Alternative would facilitate the provision of high-quality housing in a variety of forms, sizes, and densities to serve the diverse population of the City; however, at a reduced scale compared to the proposed project. The reduction in housing units would decrease the accommodation of a variety of housing types to meet the needs of all City residents. As such, the Reduced Intensity Alternative would be inferior to the proposed project in meeting Project Objective 5.

6. Fulfill the intent of the voter approved Measure A, which approved the Cypress Town Center and Comments Specific Plan 2.0 (CTCC Specific Plan)

Measure A, which approved the CTCC Specific Plan in June 2018, allowed for development of a town center, single-family, senior and multi-family housing, and public park space of portions of the Los Alamitos Race Course, the former Cypress Golf Club, and an adjacent property. Under the Reduced Intensity Alternative, the existing CTCC Specific Plan would remain unchanged, and no additional units would be proposed in the CTCC Specific Plan area. By avoiding any amendments to the CTCC Specific Plan, the Reduced Intensity Alternative would meet Project Objective 6.



5.5.2 Alternative 2: Lincoln Avenue Specific Plan Mixed Density

5.5.2.1 Description

As described previously, under Alternative 2, the existing residential densities in the CTCC Specific Plan would remain unchanged and would be able to accommodate a total of 1,115 residential units.

Rather than applying a density of 30 du/ac to the majority of the LASP area, Alternative 2 proposes to vary densities within the Specific Plan area between 30 du/ac and 60 du/ac. The highest density areas would be located on the east end of the Lincoln Avenue corridor, closest to Cypress College. With these changes, the LASP could accommodate the development of approximately 2,052 new units.

The Katella Avenue opportunity site in the CPPC Specific Plan area would also be included in Alternative 2 as described under the proposed project. Alternative 2 also includes an opportunity site located on the southeast corner of Orange Avenue and Grindlay Street. This 2.06-acre site currently includes an older office building and would be rezoned to RM-20 to accommodate 30 moderate/above moderate-income units. If the City proceeds with Alternative 2, amendments to the LASP and the City’s Zoning Ordinance would be undertaken through the normal public hearing process. Implementation of Alternative 2 would increase the City’s residential development capacity by up to approximately 4,348 housing units.

Table 5.B, below, provides a summary of the proposed opportunity sites under Alternative 2 and Figure 5-1, below, illustrates the location and proposed residential density of the opportunity sites.

Table 5.B: Alternative 2 Project Summary

Specific Plan	Proposed Increase In Housing Unit Capacity
Lincoln Avenue Specific Plan (LASP)	2,052
RM-20 (southeast corner of Orange Avenue and Grindlay Street)	30
Cypress Business and Professional Center Specific Plan (CBPC Specific Plan)	321
Total	2,403

Source: City of Cypress Planning Department (2023).

Overall, Alternative 2 would accommodate an additional 2,403 housing units at the opportunity sites. In addition to the 1,946 units already accommodated under existing zoning within the City, the proposed project would increase the residential development capacity in the City to a total of 4,349 housing units.

Alternative 2 would update the current General Plan Land Use Element, LASP, CBPC Specific Plan, and Zoning Ordinance to bring the General Plan and Zoning Ordinances into conformity with the City’s recently adopted 2021–2029 Housing Element.



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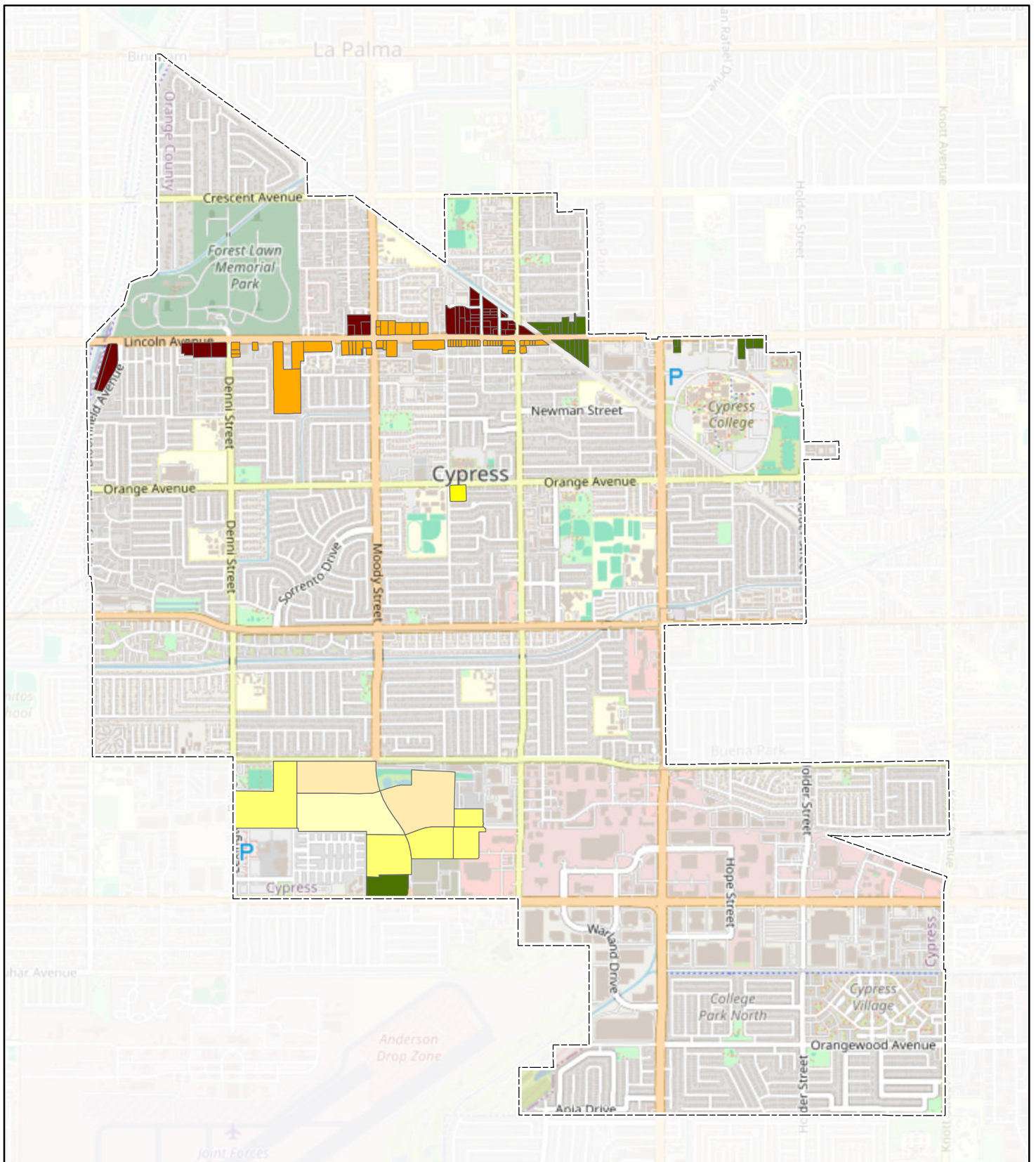
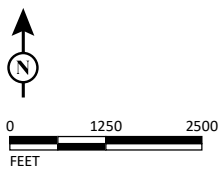


FIGURE 5-1

LSA

LEGEND

- City Boundary
- 8 units/acre
- 10 units/acre
- 15 units/acre
- 20 units/acre
- 18 units/acre
- 30 units/acre
- 45 units/acre
- 50 units/acre
- 60 units/acre



SOURCE: Esri Basemap (2022)
 I:\CCP2201.01\GIS\MXD\Alt_2.mxd (1/25/2024)

2021–2029 Cypress Housing Element Implementation Project
 Alternative 2



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5.5.2.2 Environmental Analysis

Air Quality. Alternative 2 would facilitate the development of up to 2,403 housing units on the opportunity sites within the CTCC Specific Plan and LASP areas and at Katella Avenue and Orange Avenue/Grindlay Street. Similar to the proposed project, construction activities associated with the construction of additional housing units facilitated by Alternative 2 that could occur with implementation of the project would occur through the horizon year 2045, which would cause short-term emissions of criteria air pollutants, primarily through the operation of construction equipment. Similar to the proposed project, with compliance with regulatory requirements (as specified in Regulatory Compliance Measures RCM AQ-1 through RCM AQ-4), construction impacts related to the cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under applicable National Ambient Air Quality Standards (NAAQS) or California Ambient Air Quality Standards (CAAQS) would be less than significant, and similar to the proposed project.

Please refer to Appendix B of this PEIR for the California Emissions Estimator Model (CalEEMod) version 2022.1.1.14 output sheets prepared for the proposed project and Alternative 2 to quantify the criteria pollutant emissions for construction and operational emissions of each project scenario. Similar to the proposed project, operational activities associated with the additional housing units facilitated by Alternative 2 would result in long-term air pollutant emissions associated with mobile sources (e.g., vehicle trips), energy sources (e.g., natural gas), and area sources (e.g., architectural coatings and the use of landscape maintenance equipment). While Mitigation Measure MM AQ-1 would significantly reduce criteria air pollutant emissions generated during operational activities associated with the proposed project and Alternative 2, there is currently not enough information to quantify emissions of specific project development that may occur under the proposed project or Alternative 2. Without quantification to guarantee a less than significant finding, future development projects may still exceed the South Coast Air Quality Management District (SCAQMD) regional significance thresholds. Therefore, similar to the proposed project, operation of Alternative 2 would result in a significant impact related to a cumulatively considerable net increase of any criteria pollutant for which the region is in nonattainment under an applicable federal or State ambient air quality standard. Further, implementation of Alternative 2 would have the potential to conflict or obstruct implementation of applicable air quality plans under Indicator 1², similar to the proposed project, because Alternative 2 would result in significant and unavoidable long-term operational pollutant emissions.

Alternative 2 would facilitate the development of 2,403 housing units under the 2021–2029 Housing Element, 89 more units as compared to the proposed project. As such, the operational air quality impacts associated with implementation of Alternative 2 are anticipated to be greater than the proposed project. As such, impacts associated with air quality would be significant and unavoidable, and greater than the proposed project.

² Indicator 1 refers to whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or emission reductions in the AQMP.



Cultural Resources. Alternative 2 would allocate residential units between the LASP area, the CBPC Specific Plan area, the CTCC Specific Plan area, and the southeast corner of Orange Avenue and Grindlay Street. Similar to the proposed project, Alternative 2 is a programmatic update to the City's General Plan, the LASP, the CTCC Specific Plan, the CBPC Specific Plan, and the Zoning Ordinance and would not directly result in physical development. Consequently, the specific location and configuration of future development along Lincoln Avenue has not yet been determined and is not under consideration as part the programmatic update.

Similar to the proposed project, future development within the CTCC opportunity sites and along Lincoln Avenue would evaluate each development's treatment of the historically significant resources and reduce any potentially significant impacts to the extent feasible. Therefore, impacts associated with cultural resources would be less than significant, and similar to the proposed project.

Energy. Alternative 2 would facilitate the development of up to 2,403 housing units on the opportunity sites identified within the CTCC and LASP areas and at Katella Avenue and Orange Avenue/Grindlay Street. Similar to the proposed project, construction activities associated with the construction of additional housing units facilitated by Alternative 2 would cause fuel consumption associated with construction activities, primarily through the transport and use of construction equipment, delivery vehicles and haul trucks, and construction worker vehicles that would use petroleum fuels (e.g., diesel fuel and/or gasoline).

Alternative 2 would facilitate the development of 89 more housing units as compared to the proposed project. As such, the construction of Alternative 2 would require more fuel use as compared to the proposed project. Construction of the proposed project would increase the annual construction generated fuel use in Orange County by approximately 0.1 percent for gasoline fuel usage and 0.1 percent for diesel fuel usage. As such, project construction would have a negligible effect on local and regional energy supplies. Furthermore, impacts related to energy use during construction would be temporary and relatively small in comparison to Orange County's overall use of the State's available energy resources. Although Alternative 2 would result in the facilitation of 89 more housing units as compared to the project, because the proposed project would result in a negligible increase in fuel consumption during construction (less than 1 percent), it is reasonable to assume that construction of Alternative 2 would also result in less than significant impacts on fuel use in the County.

Please refer to Appendix D for the energy calculations utilized to determine the construction and operational energy impacts of both the proposed project and Alternative 2. Similar to the proposed project, operational activities associated with the additional housing units facilitated by Alternative 2 would result in energy demand associated with natural gas use, electricity consumption, and fuel used for vehicle trips. Alternative 2 would facilitate the development of 89 more units as compared to the proposed project. As such, operational activities associated with the housing units facilitated by Alternative 2 would be greater than the proposed project. Operation of the proposed project would increase both the annual electricity and natural gas consumption in Orange County by approximately 0.1 percent. Although Alternative 2 would result in the facilitation of 89 more housing units as compared to the project, because the proposed project would result in a negligible increase in electricity and natural gas consumption during operation (less than 1 percent), it is



reasonable to assume that construction of Alternative 2 would also result in less than significant impacts on electricity and natural gas consumption in the County. Additionally, similar to the proposed project, implementation of Alternative 2 would not result in the inefficient, wasteful, and unnecessary consumption of energy.

Overall, impacts associated with energy would be less than significant, and slightly greater than the proposed project.

Greenhouse Gas Emissions. Alternative 2 would facilitate the development of up to 2,403 housing units on the opportunity sites identified within the CTCC Specific Plan and LASP areas and at Katella Avenue and Orange Avenue/Grindlay Street. Similar to the proposed project, construction activities associated with the construction of additional housing units facilitated by Alternative 2 would cause short-term GHG emissions, primarily through the operation of construction equipment.

Alternative 2 would facilitate the development of 89 more units as compared to the proposed project. As such, the construction of Alternative 2 would result in greater short-term GHG emissions as compared to the proposed project. Although Alternative 2 would result in the facilitation of 89 more housing units as compared to the project, because the proposed project would result in less than significant impacts relating to greenhouse gas emissions during construction, it is reasonable to assume that construction of Alternative 2 would also result in less than significant impacts on fuel use in the County.

Similar to the proposed project, operational activities associated with the additional housing units would result in long-term GHG emissions associated with mobile (project generated vehicle trips), area, waste, water, and stationary sources as well as indirect emissions from sources associated with energy consumption. Although Alternative 2 would result in the facilitation of 89 more housing units as compared to the project, because the proposed project would result in per service population emissions of 2.8 metric tons of carbon dioxide equivalents per year per service population (MT CO₂e/yr/SP) (which would be below the SCAQMD's plan-level screening threshold of 4.1 MT CO₂e/yr/SP), it is reasonable to assume that construction of Alternative 2 would also result in less than significant impacts on operational greenhouse gas emissions.

In addition, similar to the proposed project, Alternative 2 would be consistent with all project attributes in the 2022 Scoping Plan, including residential and mixed-use project attributes related to EV charging requirements, parking minimization requirements, and building electrification, and would not interfere with SCAG's ability to implement the regional strategies outlined in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), with implementation of Mitigation Measure MM GHG-1. Overall, impacts associated with greenhouse gas emissions would be less than significant, and slightly greater than the proposed project.

Land Use and Planning. Similar to the proposed project, implementation of Alternative 2 would not physically divide an established community. Implementation of Alternative 2 would facilitate the development of residential units in the City, creating neighborhoods and establishing connections between residential areas. Similar to the proposed project, Alternative 2 would result in less than significant impacts associated with the division of an established community.



As described previously, under Alternative 2, the CTCC Specific Plan would remain unchanged and would be able to accommodate a total of 1,115 units affordable to moderate and above moderate-income households. Rather than applying a density of 30 du/ac to the majority of the LASP area, Alternative 2 proposes to vary densities within the Specific Plan area between 30 du/ac and 60 du/ac. With these changes, the LASP could accommodate the development of approximately 2,052 new units. The Katella Avenue opportunity site in the CBPC Specific Plan area would also be included in Alternative 2 as described under the proposed project. Alternative 2 also includes an opportunity site located on the southeast corner of Orange Avenue and Grindlay Street. This 2.06-acre site currently includes an older office building and would be rezoned to RM-20 to accommodate 30 moderate/above moderate-income units. If the City proceeds with Alternative 2, amendments to the LASP and the City's Zoning Ordinance would be undertaken through the normal public hearing process.

With the necessary amendments to the LASP and the City's Zoning Ordinance, Alternative 2 would be consistent with the City's General Plan, the City's Zoning Ordinance, the LASP, and the CTCC Specific Plan. In addition, Alternative 2 would be consistent with the 2020–2045 RTP/SCS, similar to the proposed project.

Overall, impacts to land use and planning would be less than significant and similar to the proposed project.

Noise. Alternative 2 would facilitate the development of up to 2,403 housing units under the 2021–2029 Housing Element at opportunity sites identified within the CTCC and LASP areas and at Katella Avenue and Orange Avenue/Grindlay Street. Implementation of Alternative 2 would alter existing development patterns and increase residential density. Similar to the proposed project, these activities could result in the potential demolition of structures, construction, and site grading, the location of residential uses near stationary noise sources, as well as increased traffic generation. All these activities have the potential to increase ambient noise and vibration levels within the City of Cypress and to exceed acceptable noise standards.

Alternative 2 would facilitate the development of 89 more units as compared to the proposed project. As such, the construction of Alternative 2 would result in greater short-term and long-term noise impacts as compared to the proposed project. Although Alternative 2 would result in the facilitation of 89 more housing units as compared to the project, because the proposed project would result in less than significant impacts relating to noise during construction and operation, it is reasonable to assume that construction of Alternative 2 would also result in less than significant impacts on ambient noise levels in the City. In addition, similar to the proposed project, implementation of Alternative 2 would not generate excessive vibration as vibration levels generated from associated traffic on the adjacent roadways are unusual for on-road vehicles due to the rubber tires and suspension systems of on-road vehicles which provide vibration isolation. Please refer to Appendix E to compare the Year 2045 Noise Volume Summaries prepared for both the proposed project and Alternative 2.

Similar to the proposed project, according to the Land Use Plan for Joint Forces Training Base Los Alamitos (Orange County Airport Land Use Commission 2017), the opportunity sites are not within the 60 A-weighted decibel community noise equivalent level (dBA CNEL) or 65 dBA CNEL noise



contours for JFTB Los Alamitos and therefore, impacts related to noise would be less than significant.

Overall, impacts associated with noise would be less than significant, and slightly greater than the proposed project.

Population and Housing. According to the 2017 American Housing Survey (AHS), the average household size in structures that have 50 or more housing units (the highest housing density type evaluated in the AHS) in the Los Angeles-Long Beach-Anaheim Metropolitan Statistical Area (MSA) was 1.99 persons. Alternative 2 would facilitate the development of up to 2,403 housing units on the opportunity sites with a corresponding net increase of approximately 4,782 persons. Due to the additional 89 units proposed under Alternative 2 as compared to the proposed project, this increase in population would be approximately 177 persons greater than the anticipated population increase of 4,605 persons with implementation of the proposed project.

Similar to the proposed project, although Alternative 2 would facilitate the development of new homes in the City, the proposed new homes would not induce substantial unplanned population growth as the alternative is designed to meet the City's housing need allocation of 3,936 units as determined by the SCAG RHNA. As such, the proposed project would be consistent with planned regional housing growth and planned population growth of the City as evaluated in the SCAG RHNA. In addition, similar to the proposed project, the opportunity sites proposed under Alternative 2 are located in urbanized settings with a full range of public services and utilities. As such, Alternative 2 would not cause indirect substantial unplanned population growth through the extension of roads and other infrastructure. Impacts associated with unplanned population growth, would be less than significant and similar to the proposed project. No mitigation would be necessary.

Public Services. Alternative 2 would facilitate the development of up to 2,403 housing units at opportunity sites identified within the CTCC and LASP areas and at Katella Avenue and Orange Avenue/Grindlay Street. Alternative 2 would result in a net increase of approximately 4,782 persons. Due to the additional 89 units proposed under Alternative 2 as compared to the proposed project, this increase in population would be approximately 177 persons greater than the anticipated population increase of 4,605 with implementation of the proposed project. As described further below, impacts to public services with implementation of Alternative 2 would be less than significant, and slightly greater than or similar to the proposed project.

Fire Protection Services. Each of the opportunity sites are surrounded by existing development and are located in areas of the City already served by the Orange County Fire Authority (OCFA). The OCFA currently serves over 1,984,758 residents from its 77 fire stations located throughout the County, including Fire Station No. 17 located within the City and Fire Station Nos. 2, 63, and 84 located nearby. The addition of 4,782 residents would increase the population served by 0.2 percent, similar to the proposed project. This increase in population served by OFCA would be negligible and would not impact OCFA's ability to serve the City.

Similar to the proposed project, any future projects implemented in accordance with Alternative 2 would be required to adhere to all OCFA requirements, including providing adequate fire flow/structure protection to the future development sites and providing adequate



access for emergency vehicles. In addition, any future development projects would be required to obtain City approval of building plans prior to issuance of building permits and would be required to demonstrate during the development review process that fire service providers would be able to provide adequate fire protection through building design requirements and access. Further, similar to the proposed project, all future projects implemented in accordance with Alternative 2 would be subject to additional CEQA review related to specific development applications. Alternative 2 would also be required to comply with Regulatory Compliance Measure RCM PS-1, which requires coordination with OCFA during the development and CEQA review process to determine the appropriate development impact fees required in order to offset potential impact to OCFA staffing and service ability. However, implementation of Alternative 2 would facilitate the development of more homes compared to the proposed project, resulting in a greater increase in population served by OFCA. Therefore, impacts on fire protection services would be less than significant and similar to the proposed project. No mitigation is required.

Police Protection Services. The Cypress Police Department (CPD) currently has 55 sworn personnel and in 2019, had an officer-to-resident ratio of 1.0 CPD officer per 1,000 residents. Since 2019, the officer-to-resident ratio has fluctuated around 1.0 CPD officer per 1,000 residents. In 2021, the City had a population of 49,926, increasing the officer-to-resident ratio to 1.1 CPD officer per 1,000 residents. The increase of 4,782 persons in the City as facilitated by Alternative 2 would result in an officer-to-resident ratio of 1 CPD officer per 1,000 residents, which is consistent with the officer-to-resident ratio of the City since 2019 and the proposed project. Although Alternative 2 would likely result in a greater increase in the number of calls to law enforcement within the City as compared to the proposed project due to the additional population increase associated with the construction of 89 more housing units, CPD has confirmed that it anticipates hiring additional officers in order to adequately serve future population growth in the City, including the population increase associated with implementation of the housing element. In addition, CPD has confirmed that it has adequate facilities to accommodate additional officers.

Similar to the proposed project, any future projects implemented in accordance with Alternative 2 would be required to adhere to all applicable policies and codes related to the provision of police services. In addition, any future development projects would be required to obtain City approval of building plans prior to issuance of building permits and would be required to demonstrate during the development review process that law enforcement providers would be able to provide adequate police protection services. Further, the officer-to-resident ratio of the City with implementation of Alternative 2 would be the same as with implementation of the proposed project. Therefore, impacts on police protection services would be less than significant and similar to the proposed project. No mitigation is required.

Schools. The California Office of Public-School Construction has published general student yield factors for elementary, secondary (middle/high school), and unified school districts in California (May 2009). The student generation rate for elementary schools is 0.5 student per dwelling unit and the student generation rate for middle/high school students is 0.2 student per dwelling unit. These student generation rates were used to estimate the number of students that could be



generated within the boundaries of the Los Alamitos Unified School District (LAUSD) and the Anaheim Union High School District (AUHSD) as a result of project implementation. According to the Residential and Commercial/Industrial Development School Fee Justification Study performed for the Cypress School District (CSD) by Cooperative Strategies and dated April 30, 2020, the elementary student generation rate for multi-family units (high density units) in the CSD is 0.255 student per unit. According to the Developer Fee Justification Study performed for the Centralia Elementary School District (CESD) by Cooperative Strategies and dated November 9, 2022, the elementary student generation rate for multi-family units (high density units) in the CESD is 0.32 student per unit. These student generation rates were used to estimate the number of students that could be generated within the boundaries of the CSD and CESD as a result of project implementation. Implementation of Alternative 2 would result in approximately 2,142 units in the CSD, 170 units in the CESD, 91 units in the LAUSD, and 2,142 units in the AUHSD.

Based on these generation factors, it is estimated that Alternative 2’s 2,403 residential units could generate approximately 613 elementary school students and 481 middle/high school students (refer to Table 5.C), resulting in an additional 41 students as compared to the proposed project.

Table 5.C: Projected School Enrollment for Alternative 2

Grade Levels	Student Generation Factor	Projected Enrollment
Cypress School District (CSD)	0.255 student/unit	546 students
Centralia Elementary School District (CESD)	0.32 student/unit	54 students
Los Alamitos Unified School District (LAUSD) (Elementary School)	0.5 student/unit	46 students
Los Alamitos Unified School District (LAUSD) (Middle/High School)	0.2 student/unit	18 students
Anaheim Union High School District (AUHSD) (Middle/High School)	0.2 student/unit	428 students
Total	--	1,065 students

Source: State of California, Office of Public School Construction (2019). School Facility Program Handbook. January. Website: https://www.dgs.ca.gov/-/media/Divisions/OPSC/Services/Guides-and-Resources/SFP_Hdbk_ADA.ashx?la=en&hash=14D0F03EABD3AF437F3F4E2FDE1A602AFDFEE6C2 (accessed May 23, 2023).

Cooperative Strategies. *Residential and Commercial/Industrial Development School Fee Justification Study, Cypress School District Table 5: Adjusted Student Generation Factors*. April 30, 2020.

Cooperative Strategies. *Developer Fee Justification Study, Centralia Elementary School District*. November 9, 2022.

Implementation of Alternative 2 would facilitate the development of more residential units compared to the proposed project, resulting in a greater increase in the population of school-aged children. Implementation of Alternative 2 is expected to generate approximately the same number of students within the boundaries of the CSD, LAUSD, and AUHSD as the proposed project. However, implementation of Alternative 2 would result in approximately 29 more students within the boundary of the CESD as compared to the proposed project due to the higher proposed density of the opportunity sites east of Valley View Street.



Similar to the proposed project, the increase in students projected as a result of project implementation would increase the demand for school facilities. However, future development allowed under Alternative 2 would accommodate planned regional housing growth included in the SCAG RHNA, which is based on populations estimates for the City, including school-aged children. Therefore, although implementation of Alternative 2 would facilitate an increase in demand for school facilities, this increase in demand is consistent with the increase in the City's population.

In addition, according to the AUHSD Facilities Master Plan Update, the AUHSD is experiencing an overall decline in enrollment of approximately 3,200 students through the 2025–2026 school year in the Cities of Anaheim, Buena Park, Cypress, La Palma, and Stanton.³ Further, pursuant to California Education Code Section 17620(a)(1), the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district for the purpose of funding the construction or reconstruction of school facilities. Similar to the proposed project, Regulatory Compliance Measure RCM PS-1 requiring the Applicant/Developer to pay such fees to reduce any impacts of new residential development on school services as provided in Section 65995 of the California Government Code would be applicable to Alternative 2. With the AUHSD's projected decline in enrollment, and with payment of development impact fees on a project-by-project basis, it is expected that AUHSD would have sufficient capacity to accommodate new middle and high school level students generated with implementation of Alternative 2.

According to the Residential and Commercial/Industrial Development School Fee Justification Study performed for the CSD by Cooperative Strategies and dated April 30, 2020, the CSD is operating under capacity and has an additional 1,011 seats available for new students. The increase of 546 elementary level students can be accommodated by the CSD's available capacity. In addition, with implementation of Regulatory Compliance Measure (RCM) PS-1 as described above, it is expected that CSD would have sufficient capacity to accommodate new elementary level students generated with implementation of Alternative 2. The fees would be collected by the AUHSD and shared equally with the CSD.

The CESD had been experiencing a decline in enrollment between the 2016–2017 school year and the 2020–2021 school year; however, since the 2020–2021 school year, the school district has been experiencing a small increase in enrollment. The additional residential units allowed under Alternative 2 within the CESD boundary would generate approximately 54 new elementary level students. The Applicant/Developer of future residential development projects allowed under Alternative 2 would be required to pay such fees to reduce any impacts of new residential development on school services as provided in Section 65995 of the California Government Code (refer to Regulatory Compliance Measure RCM PS-1). Although in recent years the CESD has experience as slight increase in enrollment, because of the district's historic decline in enrollment, and with payment of development impact fees on a project-by-project basis, it is expected that CESD would have sufficient capacity to accommodate elementary school level students generated with implementation of Alternative 2.

³ Anaheim Union High School District (AUHSD). *Facilities Master Plan Update, 3.2 Planning Considerations; Enrollment Projections and Demographics*. 2022.



The LAUSD has also been experiencing a decline in enrollment since the 2016–2017 school year. The additional residential units allowed under Alternative 2 within the LAUSD boundary would generate approximately 46 new elementary level students and approximately 18 new middle/high school level students, for a total of 64 new students. This increase in students can be accommodated by the LAUSD. In addition, the Applicant/Developer of future residential development projects allowed under Alternative 2 would be required to pay such fees to reduce any impacts of new residential development on school services as provided in Section 65995 of the California Government Code (refer to Regulatory Compliance Measure PS-1). With the LAUSD’s continued pattern of decline in enrollment, and with payment of development impact fees on a project-by-project basis, it is expected that LAUSD would have sufficient capacity to accommodate new students generated with implementation of Alternative 2.

Pursuant to the provisions of Government Code Section 65996, a project’s impact on school facilities is fully mitigated through payment of the requisite school facility development fees current at the time a building permit is issued. Therefore, with payment of the required fees, as outlined in Regulatory Compliance Measure RCM PS-1, potential impacts to schools would be less than significant and slightly greater than the proposed project. No mitigation is required.

Transportation. Alternative 2 would facilitate the development of up to 2,403 housing units on opportunity sites identified within the CTCC and LASP areas and at Katella Avenue and Orange Avenue/Grindlay Street. Similar to the proposed project, implementation of Alternative 2 would increase trips to and from the opportunity sites, potentially impacting the surrounding circulation system. Alternative 2 would facilitate the development of 89 more units as compared to the proposed project. As such, the construction of Alternative 2 would result in greater transportation impacts as compared to the proposed project. Level of service (LOS) and Vehicle Miles Traveled (VMT) analyses performed for the proposed project indicated that the proposed project would not exceed significance thresholds established by the City of Cypress and County of Orange. Although Alternative 2 would result in the facilitation of 89 more housing units as compared to the project, because the proposed project would result in less than significant impacts relating to transportation, it is reasonable to assume that construction of Alternative 2 would also result in less than significant impacts on transportation in the City. In addition, similar to the proposed project, compliance with the City’s Municipal Code would address transportation design and emergency access associated with Alternative 2. In addition, similar to the proposed project, Alternative 2 would not alter the existing circulation system in the City as any improvements needed to accommodate future residential units would be analyzed during site plan review and any circulation improvements such as driveway access and intersection controls would be implemented consistent with the City’s Municipal Code.

Overall, impacts associated with transportation would be less than significant, and slightly greater than the proposed project.

Tribal Cultural Resources. Alternative 2 would allocate residential units between the LASP area, the CBPC Specific Plan area, the CTCC Specific Plan area, and the southeast corner of Orange Avenue and Grindlay Street. During the CEQA environmental review process, Native American consultation was conducted in compliance with Senate Bill (SB) 18 and Assembly Bill (AB) 52 for the proposed project. Because the tribal outreach process for the proposed project yielded no knowledge of



significant tribal resources, it can reasonably be assumed that the proposed project, as well as Alternative 2, would not cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074.

Similar to the proposed project, because future development of Alternative 2's opportunity sites could require excavation and other potentially disturbing aspects of construction into soils, there is a potential to uncover undiscovered tribal cultural resources during excavation, including human remains. Therefore, while unlikely, the presence of undiscovered subsurface tribal cultural resources is possible, and these resources could potentially be affected by construction activities. As a result, similar to the proposed project, impacts to tribal cultural resources with implementation of Alternative 2 are potentially significant without mitigation. Similar to the proposed project, Alternative 2 would be required to comply with Regulatory Compliance Measures RCMs CUL-1 and CUL-2 in order to reduce potential impacts to previously undiscovered archaeological resources and human remains.

With the incorporation of Regulatory Compliance Measures RCMs CUL-1 and CUL-2, potential impacts to unknown tribal cultural resources with implementation of Alternative 2 would be less than significant, and similar to the proposed project.

Utilities and Service Systems. Alternative 2 would facilitate the development of up to 2,403 housing units on the opportunity sites identified within the CTCC and LASP areas and at Katella Avenue and Orange Avenue/Grindlay Street. Alternative 2 would result in a net increase of approximately 4,782 persons. Due to the additional 89 units proposed under Alternative 2 as compared to the proposed project, this increase in population would be approximately 177 persons greater than the anticipated population increase of 4,605 with implementation of the proposed project.

Water. Similar to the proposed project, any future projects implemented in accordance with Alternative 2 would result in an increase in water demand at the opportunity sites. The Golden State Water Company (GSWC) West Orange Service Area *2020 Urban Water Management Plan* (UWMP) states that in 2045, annual water use in its service area is expected to be 15,759 acre-feet and total water supplies available would be 23,645 acre-feet. According to CalEEMod projections, Alternative 2 would result in approximately 90,174,137 gallons per year (gpy) or 277 acre-feet per year (afy) of indoor water use, and account for 1.8 percent of the estimated water demand and 1.2 percent of the total available water supplies in the service area for 2045. This represents a minimal increase in water demand within the GSWC West Orange Service Area. The construction of additional or expanded water infrastructure would not be necessary. According to CalEEMod projections, the proposed project would result in approximately 86,834,354 gallons per year (gpy) or 267 afy of indoor water use and account for 1.7 percent of the estimated water demand and 1.1 percent of the total available water supplies in the service area for 2045.

Additionally, similar to the proposed project, some of the 2,403 units facilitated by Alternative 2 would replace existing urban uses that currently use water, and all future projects would be required to demonstrate that existing public utilities would be sufficient to serve the future projects' needs as part of their specific environmental review process. Although the increase in water demand with implementation of Alternative 2 would be minimal, the water demand



would be slightly greater than that of the proposed project. As such, impacts would be less than significant and slightly greater than the proposed project. No mitigation is required.

Wastewater. Similar to the proposed project, any future projects implemented in accordance with Alternative 2 would result in an increase in wastewater generation at the opportunity sites. The OCSD, which is responsible for the provision of wastewater treatment facilities at the opportunity sites, has a capacity of treating 180 million gallons of wastewater per day from residential, commercial, and industrial sources at two plants: Reclamation Plant No. 1 in Fountain Valley and Treatment Plant No. 2 in Huntington Beach. Reclamation Plant No. 1 has a primary treatment capacity of 208 mgd, and is running under capacity at approximately 120 mgd. Reclamation Plant No. 2 has a primary treatment capacity of 168 mgd and currently receives 59 mgd. Alternative 2 is anticipated to generate approximately 249 af of wastewater annually, or 222,146 gallons of wastewater per day.⁴ This accounts for 0.12 percent of OCSD's daily capacity, 0.11 percent of the current capacity of Reclamation Plant No. 1, and 0.13 percent of the current capacity of Reclamation Plant No. 2. Consequently, anticipated wastewater generation by Alternative 2 would be negligible (less than 1 percent) compared to the available capacities of OCSD, Reclamation Plant No. 1, and Reclamation Plant No. 2. The construction of additional or expanded wastewater facilities or infrastructure would not be necessary. By comparison, the proposed project is anticipated to generate approximately 240 af of wastewater annually, or 214,116 gallons of wastewater per day. This accounts for 0.11 percent of OCSD's daily capacity, 0.10 percent of the current capacity of Reclamation Plant No. 1, and 0.13 percent of the current capacity of Reclamation Plant No. 2.

Additionally, similar to the proposed project, some of the 2,403 housing units facilitated by Alternative 2 would replace existing urban uses that currently generate wastewater and all future projects would be required to demonstrate that existing public utilities would be sufficient to serve the future projects' needs as part of their specific environmental review process. Although the increase in wastewater generation with implementation of Alternative 2 would be negligible, the amount of wastewater generated would be slightly greater than that of the proposed project. As such, impacts would be less than significant and slightly greater than the proposed project. No mitigation is required.

Stormwater/Drainage. Similar to the proposed project, any future projects implemented in accordance with Alternative 2 which disturb more than 1 acre of soil would comply with the requirements of the Construction General Permit and would include the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would include construction Best Management Practices (BMPs) to control and direct on-site surface runoff and would include detention facilities, if required, to ensure that stormwater runoff from the construction site would not exceed the capacity of the stormwater drainage systems. If applicable, a SWPPP would also detail Erosion Control and Sediment Control BMPs to be implemented during project construction to minimize erosion and retain sediment on site. If a project would disturb less than 1 acre of soil, it would be subject to the requirements of Section 5.106 of the 2022 California Green Building Standards Code (CALGreen Code), which requires

⁴ In the absence of an official wastewater generate rate, wastewater can be reasonably assumed to be 90 percent of the water use.



projects that disturb less than 1 acre of soil and that are not part of a larger common plan to comply with the local municipal code and/or implement a combination of erosion and sediment control and good housekeeping BMPs to prevent pollution of stormwater runoff during construction activities.

Similar to the proposed project, the new development allowed under Alternative 2 would also comply with the Orange County MS4 Permit, which requires the preparation of a Final WQMP and implementation of operational BMPs to target and reduce pollutants of concern in stormwater runoff from project sites. Compliance with the Orange County MS4 Permit would reduce operational impacts related to surface water quality standards, waste discharge requirements, and/or degradation of water quality to a less than significant level, and no mitigation is required.

Additionally, some of the 2,403 housing units would replace existing urban uses that currently contribute to stormwater flows, similar to the proposed project. Any future projects implemented in accordance with Alternative 2 would be required to adhere to the General Plan, provide required development impact fees, and comply with applicable development regulations pertaining to stormwater drainage. As a part of the development review process, all future projects would also be required to demonstrate that existing public utilities would be sufficient to serve the future projects' needs. As such, Alternative 2 would not require the relocation or construction of new or expanded stormwater facilities or infrastructure. Impacts would be less than significant and similar to the proposed project. No mitigation is required.

Electric Power. Similar to the proposed project, any future projects implemented in accordance with Alternative 2 would result in an increase in electricity use at the opportunity sites. The City is within the service territory of Southern California Edison (SCE), which provides services through a grid of transmission lines and related facilities. According to the California Energy Commission (CEC), total electricity consumption in the SCE service area in 2021 was 81,129 gigawatt-hours (GWh). Total electricity consumption in Orange County in 2021 was 18,932 GWh (7,272 GWh for the residential sector and 11,660 GWh for the non-residential sector). Based on the CalEEMod outputs for Alternative 2, the estimated electricity demand associated with the residential development allowed under Alternative 2 is approximately 8,808,999 kilowatt-hours (kWh) per year. Therefore, implementation of Alternative 2 would increase annual electricity consumption in the SCE service area and Orange County by approximately 0.01 and 0.05 percent, respectively. Consequently, anticipated electricity consumption by Alternative 2 would be negligible (less than 1 percent) compared to the total consumption of the SCE service area and Orange County. No additional or expanded electricity facilities or infrastructure would be required. Based on the CalEEMod outputs for the proposed project, the estimated electricity demand associated with the operation of the new residential development allowed under the proposed project would be approximately 8,482,740 kWh per year, and approximately 0.01 and 0.04 percent of the annual electricity consumption in the SEC service area and Orange County, respectively.

Additionally, similar to the proposed project, some of the 2,403 housing units facilitated by Alternative 2 would replace existing urban uses that currently use electricity, and all future projects would be required to demonstrate that existing public utilities would be sufficient to



serve the future projects' needs as part of their specific environmental review process. Although the increase in electricity use with implementation of Alternative 2 would be negligible, the electricity demand would be slightly greater than that of the proposed project. As such, impacts would be less than significant and slightly greater than the proposed project. No mitigation is required.

Natural Gas. Similar to the proposed project, any future projects implemented in accordance with Alternative 2 would result in an increase in natural gas use at the opportunity sites. The City is within the service territory of Southern California Gas Company (SoCalGas). According to the CEC, total natural gas consumption in the SoCalGas service area in 2021 was 5,101 million therms (2,261 million therms for the residential sector and 937 million therms for the commercial sector) and total natural gas consumption in Orange County in 2021 was 580 million therms (362 million therms for the residential sector and 218 therms for the non-residential sector). Based on the CalEEMod outputs for Alternative 2, the estimated potential increase in natural gas demand at the opportunity sites is anticipated to be approximately 26,689,743 thousand British thermal units (kBtu) per year, or approximately 266,961 therms per year. Therefore, the development of new residential development allowed under the Alternative 2 would increase annual natural gas consumption in the SoCalGas service area and Orange County by approximately 0.005 and 0.05 percent, respectively. Consequently, anticipated natural gas consumption facilitated by Alternative 2 would be negligible (less than 1 percent) compared to the total consumption of the SoCalGas service area and Orange County. Alternative 2 would not require the construction of any physical improvements related to the provision of natural gas service that would result in significant environmental impact. Based on the CalEEMod outputs for the proposed project, the estimated potential increase in natural gas demand at the opportunity sites is anticipated to be approximately 25,701,324 kBtu per year, approximately 257,075 therms per year, and approximately 0.005 and 0.04 percent of the annual natural gas consumption in the SoCalGas service area and Orange County, respectively.

Additionally, similar to the proposed project, some of the 2,403 housing units facilitated by Alternative 2 would replace existing urban uses that currently use natural gas, and all future projects would be required to demonstrate that existing public utilities would be sufficient to serve the future projects' needs as part of their specific environmental review process. Although the increase in natural gas usage with implementation of Alternative 2 would be negligible, the natural gas demand would be slightly greater than that of the proposed project. As such, impacts would be less than significant and slightly greater than the proposed project. No mitigation is required.

Telecommunication Facilities. Telephone, television, and internet services are offered by a variety of providers in the City. Similar to the proposed project, any future projects that would be developed in accordance with Alternative 2 would be responsible for constructing adequate tele-communication facility extensions on their respective project sites. The construction and expansion of these facilities would occur on site during the site preparation and earthwork phase and are not expected to impact any telephone, cable, or internet services offsite that serve the surrounding areas. Additionally, telecommunication facilities are generally installed concurrently with utility expansions and impacts associated with the expansion of



telecommunications facilities are already considered in the air quality, noise, and construction traffic analysis. Therefore, the impacts associated with the relocation or construction of new or expanded telecommunication facilities and impacts would be less than significant and similar to the proposed project. No mitigation is required.

Solid Waste. Similar to the proposed project, any future projects implemented in accordance with Alternative 2 would result in an increase in solid waste generation at the opportunity sites. Currently, OC Waste & Recycling (OCWR), which provides solid waste disposal at the opportunity sites, maintains and operates three Class III sanitary landfills including the Frank R. Bowerman Landfill, the Olinda Alpha Landfill, and the Prima Deshecha Landfill. According to CalEEMod calculations, the future residential development facilitated by Alternative 2 would generate approximately 1,777 tons of solid waste per year. The additional solid waste generation of 1,777 tons of solid waste per year, or 4.87 tons per day (tpd), facilitated by Alternative 2 represents 0.04 percent, 0.06 percent, and 0.1 percent of the daily permitted tonnage of the Frank R. Bowerman Landfill, Olinda Alpha Landfill, and Prima Deshecha Landfill, respectively. Consequently, anticipated solid waste generation facilitated by Alternative 2 would be negligible (less than 1 percent) compared to the total amount of solid waste received by the three landfills. Alternative 2 would not require the construction of any physical improvements related to the provision of solid waste disposal that would result in significant environmental impact and the OCWR solid waste disposal system would have adequate capacity to serve the residential developments facilitated by Alternative 2. According to CalEEMod calculations, the future residential developments facilitated by the proposed project would generate approximately 1,711 tons of solid waste per year and represents 0.04 percent, 0.06 percent, and 0.1 percent of the daily permitted tonnage of the Frank R. Bowerman Landfill, the Olinda Alpha Landfill, and the Prima Deshecha Landfill, respectively.

Additionally, similar to the proposed project, some of the 2,403 housing units facilitated by Alternative 2 would replace existing urban uses that currently generate solid waste, and all future projects would be required to demonstrate that existing public utilities would be sufficient to serve the future projects' needs as part of their specific environmental review process. The increase in solid waste generation with implementation of Alternative 2 would be negligible and similar to the proposed project. As such, impacts would be less than significant and similar to the proposed project. No mitigation is required.

5.5.2.3 Overview of Potential Impact/Comparison to Proposed Project

Alternative 2 would result in the accommodation of an additional 89 housing units as compared to the proposed project. Environmental impacts associated with implementation of Alternative 2 on air quality, cultural resources, energy, greenhouse gas emissions, land use and planning, noise, population and housing, public services, transportation, and utilities and service systems would be similar to or slightly greater than the proposed project. In addition, the significant and unavoidable impacts on air quality would still occur.

5.5.2.4 Attainment of Project Objectives

Alternative 2 would meet all of the project objectives. The attainment of project objectives is discussed further below.



1. Provide consistency between the 2021–2029 Housing Element, the City’s General Plan, the LASP, the CTCC Specific Plan, the CBPC Specific Plan, and the City’s Zoning Ordinance.

Alternative 2 would provide consistency between the 2021–2029 Housing Element, the City’s General Plan, the LASP, the CTCC Specific Plan, the CBPC Specific Plan, and the City’s Zoning Ordinance as the alternative would implement one of the two alternatives identified in the 2021–2029 Housing Element to the full extent. As such, Alternative 2 would be similar to the proposed project in meeting Project Objective 1.

2. Meet the City’s housing needs as identified in the Regional Housing Needs Assessment Requirement (3,936 new housing units).

Alternative 2 would meet the City’s housing needs as identified in the Regional Housing Needs Assessment Requirement (3,936 new housing units) as the alternative would facilitate the development of up to 2,403 residential units. In addition to the 1,946 units already accommodated under existing zoning within the City, implementation of Alternative 2 would increase the residential development capacity in the City to a total of 4,349 residential units. As such, Alternative 2 would be similar to the proposed project in meeting Project Objective 2.

3. Implement sustainable planning and development practices by creating compact new developments and walkable neighborhoods to minimize the City’s contribution to greenhouse gas emissions (GHGs) and energy usage.

Alternative 2 would facilitate compact new development and walkable neighborhoods in the City; however, at a similar scale compared to the proposed project. As such, Alternative 2 would be similar to the proposed project in meeting Project Objective 3.

4. Promote changes in land use and development that reflect changes in the regional economy. Promote land uses that transform now-vacant or under-utilized sites.

Alternative 2 would facilitate changes in land use and development that reflect changes in the regional economy and promote land uses that transform now vacant or under-utilized sites at a similar scale compared to the proposed project. As such, the Alternative 2 would be similar to the proposed project in meeting Project Objective 4.

5. Provide high-quality housing in a variety of forms, sizes, and densities to serve the diverse population of the City.

Alternative 2 would facilitate the provision of high-quality housing in a variety of forms, sizes, and densities to serve the diverse population of the City at an increased scale compared to the proposed project due to the additional 89 housing units that are proposed. The increase in proposed housing units would increase the accommodation of a variety of housing types to meet the needs of all City residents. As such, Alternative 2 would be superior to the proposed project in meeting Project Objective 5.

6. Fulfill the intent of the voter approved Measure A, which approved the Cypress Town Center and Comments Specific Plan 2.0 (CTCC Specific Plan)



Measure A, which approved the CTCC Specific Plan in June 2018, allowed for development of a town center, single-family, senior and multi-family housing, and public park space of portions of the Los Alamitos Race Course, the former Cypress Golf Club, and an adjacent property. Under Alternative 2, the residential densities permitted in the CTCC Specific Plan would remain unchanged and would be able to accommodate a total of 1,115 units, which is less than the total number of units that could be accommodated within the CTCC Specific Plan area with implementation of the proposed project. As such, the CTCC Specific Plan area would be developed with a town center and housing pursuant to Measure A. As such, Alternative 2 would be superior to the proposed project in meeting Project Objective 6.

5.5.3 Race Course Avoidance Alternative

5.5.3.1 Description

Under the Race Course Avoidance Alternative, opportunity sites within the Cypress Town Center and Commons Specific Plan 2.0 (CTCC Specific Plan) would not include development on the areas where the essential features of the Los Alamitos Race Course, including the track, grandstand, and race course entry, are located. All other proposed project elements, including the opportunity sites within the CBPC Specific Plan area, LASP area, and at the Katella Avenue opportunity site, would be included in the Race Course Avoidance Alternative as described under the proposed project.

Implementation of the Race Course Avoidance Alternative would remove approximately 39.2 acres of CTCC Specific Plan area from future development and would reduce the total number of proposed additional housing units within the CTCC Specific Plan by approximately 153 units. Figure 5-2, below, illustrates the location and density of the opportunity sites within the CTCC Specific Plan area.

Overall, the Race Course Avoidance Alternative would accommodate an estimated 1,638 units within the CTCC Specific Plan area and approximately 2,161 housing units under the 2021–2029 Housing Element, approximately 153 units less than the proposed project. In addition to the 1,946 units already accommodated under existing zoning within the City, the proposed project would increase the residential development capacity in the City to a total of 4,107 housing units.

The Race Course Avoidance Alternative would update the current General Plan Land Use Element, LASP, CTCC Specific Plan, CBPC Specific Plan, and Zoning Ordinance to bring the General Plan and Zoning Ordinances into conformity with the City's recently adopted 2021–2029 Housing Element.

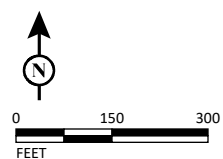
5.5.3.2 Environmental Analysis

Air Quality. The Race Course Avoidance Alternative would facilitate the development of up to 2,161 housing units on the opportunity sites identified within the CTCC Specific Plan, CBPC Specific Plan, and LASP areas while avoiding key elements of the historic Los Alamitos Race Course within the CTCC Specific Plan area. Similar to the proposed project, construction activities associated with the construction of additional housing units facilitated by the Race Course Avoidance Alternative that could occur with implementation of the project would occur through the horizon year 2045, which would cause short-term emissions of criteria air pollutants, primarily through the operation of



LSA

- CTCC Specific Plan
- City Boundaries
- Race Course Avoidance Area (39.17 acres)
- CTCC Opportunity Sites
- Essential Features



SOURCE: Google (2023), City of Cypress (2021)

I:\CCP2201.01\GIS\Pro\Cypress Housing Element Implementation.aprx (3/21/2024)

FIGURE 5-2



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construction equipment. Similar to the proposed project, with compliance with regulatory requirements (as specified in Regulatory Compliance Measures RCM AQ-1 through RCM AQ-4), operation of the Race Course Avoidance Alternative would result in a significant impact related to a cumulatively considerable net increase of any criteria pollutant for which the region is in nonattainment under an applicable federal or State ambient air quality standard. Further, implementation of the Race Course Avoidance Alternative would have the potential to conflict or obstruct implementation of applicable air quality plans under Indicator 1, similar to the proposed project, because the Race Course Avoidance Alternative would result in significant and unavoidable long-term operational pollutant emissions.

The Race Course Avoidance Alternative would facilitate the development of up to 2,161 housing units on the opportunity sites, 153 fewer housing units as compared to the proposed project. As such, the operational air quality impacts associated with implementation of the Race Course Avoidance Alternative are anticipated to be less than the proposed project. As such, the Race Course Avoidance Alternative's impacts associated with air quality would be significant and unavoidable, and less than the proposed project.

Cultural Resources. Under the Race Course Avoidance Alternative, opportunity sites within the Cypress Town Center and Commons Specific Plan 2.0 (CTCC Specific Plan) would not include development on the areas where the essential features of the Los Alamitos Race Course, including the track, grandstand, and race course entry, are located. All other proposed project elements, including the opportunity sites within the CBPC Specific Plan area and LASP area, and the Katella Avenue opportunity site, would be included in the Race Course Avoidance Alternative as described under the proposed project.

Similar to the proposed project, the Race Course Avoidance Alternative is a programmatic update to the City's General Plan, LASP, CTCC Specific Plan, CBPC Specific Plan, and Zoning Ordinance and would not directly result in physical development. Consequently, the specific location and configuration of future development along Lincoln Avenue has not yet been determined and is not under consideration as part of the programmatic update. Further, because the Race Course Avoidance Alternative would avoid key historic elements of the Los Alamitos Race Course, implementation of the alternative is not anticipated to impact any key historical resources within the CTCC Specific Plan area. Therefore, the Race Course Avoidance Alternative's impacts associated with cultural resources would be less than significant, and less than the proposed project.

Energy. The Race Course Avoidance Alternative would facilitate the development of up to 2,161 housing units on the opportunity sites identified within the CTCC Specific Plan, CBPC Specific Plan, and LASP areas while avoiding key elements of the historic Los Alamitos Race Course within the CTCC Specific Plan area. Similar to the proposed project, construction activities associated with the construction of additional housing units facilitated by the Race Course Avoidance Alternative would cause fuel consumption associated with construction activities, primarily through the transport and use of construction equipment, delivery vehicles and haul trucks, and construction worker vehicles that would use petroleum fuels (e.g., diesel fuel and/or gasoline).

The Race Course Avoidance Alternative would facilitate the development of up to 2,161 housing units on the opportunity sites, 153 fewer units than the proposed project. As such, the construction



of the Race Course Avoidance Alternative would require less fuel use as compared to the proposed project. Construction of the proposed project would increase the annual construction generated fuel use in Orange County by approximately 0.1 percent for gasoline fuel usage and 0.1 percent for diesel fuel usage. As such, project construction would have a negligible effect on local and regional energy supplies. Furthermore, impacts related to energy use during construction would be temporary and relatively small in comparison to Orange County's overall use of the State's available energy resources. As the Race Course Avoidance Alternative would result in the facilitation of 153 fewer housing units than the proposed project and the proposed project would result in a negligible increase in fuel consumption during construction (less than 1 percent), it is reasonable to assume that construction of the Race Course Avoidance Alternative would also result in less than significant impacts on fuel use in the County.

Similar to the proposed project, operational activities associated with the additional housing units facilitated by the Race Course Avoidance Alternative would result in energy demand associated with natural gas use, electricity consumption, and fuel used for vehicle trips. The Race Course Avoidance Alternative would facilitate the development of 153 fewer housing units than the proposed project. As such, operational activities associated with the housing units facilitated by the Race Course Avoidance Alternative would be less than the proposed project. Operation of the proposed project would increase both the annual electricity and natural gas consumption in Orange County by approximately 0.1 percent. As the Race Course Avoidance Alternative would result in the facilitation of 153 fewer housing units than the project and the proposed project would result in a negligible increase (less than 1 percent) in electricity and natural gas consumption during operation as compared to the total consumption of Orange County, it is reasonable to assume that construction of the Race Course Avoidance Alternative would also result in less than significant impacts on electricity and natural gas consumption in the County. Additionally, similar to the proposed project, implementation of the Race Course Avoidance Alternative would not result in the inefficient, wasteful, and unnecessary consumption of energy.

Overall, impacts associated with energy would be less than significant, and slightly less than the proposed project.

Greenhouse Gas Emissions. The Race Course Avoidance Alternative would facilitate the development of up to 2,161 housing units at the opportunity sites identified within the CTCC Specific Plan and CBPC Specific Plan areas and the LASP areas while avoiding key elements of the historic Los Alamitos Race Course within the CTCC Specific Plan area. Similar to the proposed project, construction activities associated with the construction of additional housing units facilitated by the Race Course Avoidance Alternative would cause short-term GHG emissions, primarily through the operation of construction equipment.

The Race Course Avoidance Alternative would facilitate the development of 153 fewer housing units as compared to the proposed project. As such, the construction of the Race Course Avoidance Alternative would result in less short-term GHG emissions as compared to the proposed project. As the Race Course Avoidance Alternative would facilitate the development of 153 fewer housing units than the project and the proposed project would result in less than significant impacts relating to greenhouse gas emissions during construction, it is reasonable to assume that construction of the



Race Course Avoidance Alternative would also result in less than significant impacts on fuel use in the County.

Similar to the proposed project, operational activities associated with the additional housing units would result in long-term GHG emissions associated with mobile (project generated vehicle trips), area, waste, water, and stationary sources as well as indirect emissions from sources associated with energy consumption. As the Race Course Avoidance Alternative would facilitate the development of 153 fewer housing units than the project and because the proposed project would result in per service population emissions of 2.8 MT CO₂e/yr/SP (which would be below the SCAQMD's plan-level screening threshold of 4.1 MT CO₂e/yr/SP), it is reasonable to assume that construction of the Race Course Avoidance Alternative would also result in less than significant impacts on operational greenhouse gas emissions.

In addition, similar to the proposed project, the Race Course Avoidance Alternative would be consistent with all project attributes in the 2022 Scoping Plan, including residential and mixed-use project attributes related to EV charging requirements, parking minimization requirements, and building electrification, and would not interfere with SCAG's ability to implement the regional strategies outlined in the RTP/SCS, with implementation of Mitigation Measure MM GHG-1. Overall, the Race Course Avoidance Alternative's impacts associated with greenhouse gas emissions would be less than significant, and slightly less than the proposed project.

Land Use and Planning. Similar to the proposed project, implementation of the Race Course Avoidance Alternative would not physically divide an established community. Implementation of the Race Course Avoidance Alternative would facilitate the development of residential units in the City, creating neighborhoods and establishing connections between residential areas. Similar to the proposed project, the Race Course Avoidance Alternative would result in less than significant impacts associated with the division of an established community.

As described previously, under the Race Course Avoidance Alternative, opportunity sites within the CTCC Specific Plan area would be modified to avoid and preserve in place the essential features of the Los Alamitos Race Course, including the track, grandstands, and race course entry. Implementation of the Race Course Avoidance Alternative would remove approximately 56.5 acres of CTCC Specific Plan area from future development and would reduce the total number of housing units within the CTCC Specific Plan area by 153 units. All other proposed project elements, including the opportunity sites within the CBPC Specific Plan area, LASP area, and at the Katella Avenue opportunity site, would be included in the Race Course Avoidance Alternative as described under the proposed project.

With the necessary amendments to the LASP and the City's Zoning Ordinance, the Race Course Avoidance Alternative would be consistent with the City's General Plan, the City's Zoning Ordinance, the LASP, and the CTCC Specific Plan. In addition, the Race Course Avoidance Alternative would be consistent with the 2020–2045 RTP/SCS, similar to the proposed project.

Overall, the Race Course Avoidance Alternative's impacts to land use and planning would be less than significant and similar to the proposed project.



Noise. The Race Course Avoidance Alternative would facilitate the development of up to 2,161 housing units at the opportunity sites within the CTCC Specific Plan and CBPC Specific Plan areas and the LASP area while avoiding the essential features of the historic Los Alamitos Race Course within the CTCC Specific Plan area. Implementation of the Race Course Avoidance Alternative would alter existing development patterns and increase residential density. Similar to the proposed project, these activities could result in the potential demolition of structures, construction, and site grading, the location of residential uses near stationary noise sources, as well as increased traffic generation. All these activities have the potential to increase ambient noise and vibration levels within the City of Cypress and to exceed acceptable noise standards.

The Race Course Avoidance Alternative would facilitate the development of 153 fewer housing units than the proposed project. As such, the construction of the Race Course Avoidance Alternative would result in less short-term and long-term noise impacts as compared to the proposed project. As the Race Course Avoidance Alternative would facilitate 153 fewer housing units than the proposed project and because the proposed project would result in less than significant impacts relating to noise during construction and operation, it is reasonable to assume that construction of the Race Course Avoidance Alternative would also result in less than significant impacts on ambient noise levels in the City. In addition, similar to the proposed project, implementation of the Race Course Avoidance Alternative would not generate excessive vibration as elevated vibration levels generated from associated traffic on the adjacent roadways would be unusual for on-road vehicles due to the rubber tires and suspension systems of on-road vehicles which provide vibration isolation.

Similar to the proposed project, according to the Land Use Plan for Joint Forces Training Base Los Alamitos (JFTB Los Alamitos) (Orange County Airport Land Use Commission 2017), the opportunity sites are not within the 60 A-weighted decibel community noise equivalent level (dBA CNEL) or 65 dBA CNEL noise contours for JFTB Los Alamitos and therefore, impacts related to noise would be less than significant.

Overall, the Race Course Avoidance Alternative's impacts associated with noise would be less than significant, and slightly less than the proposed project.

Population and Housing. According to the 2017 American Housing Survey (AHS), the average household size in structures that have 50 or more housing units (the highest housing density type evaluated in the AHS) in the Los Angeles-Long Beach-Anaheim Metropolitan Statistical Area (MSA) was 1.99 persons. The Race Course Avoidance Alternative would facilitate the development of up to 2,161 housing units with a corresponding net increase of approximately 4,300 persons. Due to the decrease in the total number of housing units proposed under the Race Course Avoidance Alternative as compared to the proposed project (the Race Course Avoidance Alternative would facilitate the development of 153 fewer housing units), the Race Course Avoidance Alternative would increase the City's population by approximately 305 fewer persons than the anticipated population increase of 4,605 persons with implementation of the proposed project.

Similar to the proposed project, although the Race Course Avoidance Alternative would facilitate the development of new housing units in the City, this new residential development would not induce substantial unplanned population growth as the alternative is designed to meet the City's housing



need allocation of 3,936 units as determined by the SCAG RHNA. As such, the proposed project is consistent with planned regional housing growth and planned population growth of the City as evaluated in the SCAG RHNA. In addition, similar to the proposed project, the opportunity sites proposed under the Race Course Avoidance Alternative are located in urbanized settings with a full range of public services and utilities. As such, the Race Course Avoidance Alternative would not cause indirect substantial unplanned population growth through the extension of roads and other infrastructure. Therefore, the Race Course Avoidance Alternative's impacts associated with unplanned population growth would be less than significant and similar to the proposed project. No mitigation would be necessary.

Public Services. The Race Course Avoidance Alternative would facilitate the development of up to 2,161 housing units at the opportunity sites identified within the CTCC and CBPC Specific Plan areas and the LASP area while avoiding the essential features of the historic Los Alamitos Race Course within the CTCC Specific Plan area. The Race Course Avoidance Alternative would result in a net increase of approximately 4,300 persons. Due to the decrease in the total number of housing units proposed under the Race Course Avoidance Alternative as compared to the proposed project (the Race Course Avoidance Alternative would facilitate the development of 153 fewer housing units), the Race Course Avoidance Alternative would increase the City's population by approximately 305 fewer persons than the anticipated population increase of 4,605 with implementation of the proposed project. As described further below, impacts to public services with implementation of the Race Course Avoidance Alternative would be less than significant, and slightly less than or similar to the proposed project.

Fire Protection Services. Each of the opportunity sites are surrounded by existing development and are located in areas of the City already served by OCFA. As discussed above, the OCFA currently serves over 1,984,758 residents from its 77 fire stations located throughout the County, including Fire Station No. 17 located within the City and Fire Station Nos. 2, 63, and 84 located nearby. The addition of 4,300 residents would increase the population served by 0.2 percent, similar to the proposed project. This increase in population served by OFCA is negligible and would not impact OCFA's ability to serve the City.

Similar to the proposed project, any future projects implemented in accordance with the Race Course Avoidance Alternative would be required to adhere to all OCFA requirements, including providing adequate fire flow/structure protection to the future development sites and providing adequate access for emergency vehicles. In addition, any future development projects would be required to obtain City approval of building plans prior to issuance of building permits and would be required to demonstrate during the development review process that fire service providers would be able to provide adequate fire protection through building design requirements and access. Further, similar to the proposed project, all future projects implemented in accordance with the Race Course Avoidance Alternative would be subject to additional CEQA review related to specific development applications. The Race Course Avoidance Alternative would also be required to comply with Regulatory Compliance Measure RCM PS-1, which requires coordination with OCFA during the developmental and CEQA review process to determine the appropriate development impact fees required in order to offset potential impact to OCFA staffing and service ability. However, implementation of the Race



Course Avoidance Alternative would facilitate the development of fewer homes compared to the proposed project, resulting in a smaller increase in population served by OFCA. Therefore, impacts on fire protection services would be less than significant and less than the proposed project.

Police Protection Services. CPD currently has 55 sworn personnel and in 2019, had an officer-to-resident ratio of 1.0 CPD officer per 1,000 residents. Since 2019, the officer-to-resident ratio has fluctuated around 1.0 CPD officer per 1,000 residents. In 2021, the City had a population of 49,926, increasing the officer-to-resident ratio to 1.1 CPD officer per 1,000 residents. The increase of 4,300 persons in the City as facilitated by the Race Course Avoidance Alternative would result in an officer-to-resident ratio of 1 CPD officer per 1,000 residents, which is consistent with the City's officer-to-resident ratio since 2019 and the proposed project. In addition, the Race Course Avoidance Alternative would likely result in a smaller increase in the number of calls to law enforcement within the City as compared to the proposed project due to the construction of 153 fewer housing units and CPD has confirmed that it anticipates hiring additional officers in order to adequately serve future population growth in the City, including the population increase associated with implementation of the housing element. Further, CPD has confirmed that it has adequate facilities to accommodate additional officers.

Similar to the proposed project, any future projects implemented in accordance with the Race Course Avoidance Alternative would be required to adhere to all applicable policies and codes related to the provision of police services. In addition, any future development projects would be required to obtain City approval of building plans prior to issuance of building permits and would be required to demonstrate during the development review process that law enforcement providers would be able to provide adequate police protection services. Further, the City's officer-to-resident ratio with implementation of the Race Course Avoidance Alternative would be the same as with implementation of the proposed project. Therefore, impacts on police protection services would be less than significant and less than the proposed project. No mitigation is required.

Schools. As discussed in Section 4.8, Public Services, the following student generation rates were used to evaluate potential impact on school capacity with implementation of the Race Course Avoidance Alternative:

- LAUSD and AUHSD
 - Elementary Schools: 0.5 elementary student per dwelling unit
 - Middle/High Schools: 0.2 student per dwelling unit
- CSD
 - 0.255 student per dwelling unit
- CESD
 - 0.32 student per dwelling unit



Implementation of the Race Course Avoidance Alternative would result in approximately 1,991 units in the CSD, 79 units in the CESD, 91 units in the LAUSD, and 1,991 units in the AUHSD. As compared to the proposed project, the number of housing units and corresponding increase in school aged children would remain the same within the CESD and LAUSD, while the number of housing units within the CSD and AUHSD would decrease by approximately 153 units.

Based on these generation factors, it is estimated that implementation of the Race Course Avoidance Alternative could generate approximately 579 elementary school students and 416 middle/high school students (refer to Table 5.D, Projected School Enrollment for the Race Course Avoidance Alternative), resulting in approximately 70 fewer students as compared to the proposed project.

Table 5.D: Projected School Enrollment for the Race Course Avoidance Alternative

Grade Levels	Student Generation Factor	Projected Enrollment
Cypress School District (CSD)	0.255 student/unit	508 students
Centralia Elementary School District (CESD)	0.32 student/unit	25 students
Los Alamitos Unified School District (LAUSD) (Elementary School)	0.5 student/unit	46 students
Los Alamitos Unified School District (LAUSD) (Middle/High School)	0.2 student/unit	18 students
Anaheim Union High School District (AUHSD) (Middle/High School)	0.2 student/unit	398 students
Total	--	995 students

Sources: State of California, Office of Public School Construction. 2019. School Facility Program Handbook. January. Website: https://www.dgs.ca.gov/-/media/Divisions/OPSC/Services/Guides-and-Resources/SFP_Hdbk_ADA.ashx?la=en&hash=14D0F03EABD3AF437F3F4E2FDE1A602AFDFEE6C2 (accessed May 23, 2023); Cooperative Strategies. *Residential and Commercial/Industrial Development School Fee Justification Study, Cypress School District Table 5: Adjusted Student Generation Factors*. April 30, 2020; Cooperative Strategies. *Developer Fee Justification Study, Centralia Elementary School District*. November 9, 2022.

Implementation of the Race Course Avoidance Alternative would facilitate the development of fewer residential units compared to the proposed project, resulting in a smaller increase in the population of school-aged children. Implementation of the Race Course Avoidance Alternative is expected to generate approximately the same number of students within the boundaries of the CESD and LAUSD as the proposed project. However, implementation of Race Course Avoidance Alternative would generate approximately 70 fewer students within the boundary of the CESD and AUHSD as compared to the proposed project due to the reduction of approximately 153 housing units within the CTCC Specific Plan area.

Similar to the proposed project, the increase in students projected as a result of project implementation would increase the demand for school facilities. However, future development allowed under the Race Course Avoidance Alternative would accommodate planned regional housing growth included in the SCAG RHNA, which is based on populations estimates for the City, including school-aged children. Therefore, although implementation of the Race Course Avoidance Alternative would facilitate an increase in demand for school facilities, this increase in demand is consistent with the increase in population of the City.



In addition, according to the AUHSD Facilities Master Plan Update, the AUHSD is experiencing an overall decline in enrollment of approximately 3,200 students through the 2025-2026 school year in the Cities of Anaheim, Buena Park, Cypress, La Palma, and Stanton.⁵ Further, pursuant to California Education Code Section 17620(a)(1), the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district for the purpose of funding the construction or reconstruction of school facilities. Similar to the proposed project, Regulatory Compliance Measure PS-1 requiring the Applicant/Developer to pay such fees to reduce any impacts of new residential development on school services as provided in Section 65995 of the California Government Code would be applicable to the Race Course Avoidance Alternative. With the AUHSD's projected decline in enrollment, and with payment of development impact fees on a project-by-project basis, it is expected that AUHSD would have sufficient capacity to accommodate new middle and high school level students generated with implementation of the Race Course Avoidance Alternative.

According to the Residential and Commercial/Industrial Development School Fee Justification Study performed for the CSD by Cooperative Strategies and dated April 30, 2020, the CSD is operating under capacity and has an additional 1,011 seats available for new students. The increase of 474 elementary level students under the Race Course Avoidance Alternative can be accommodated by the CSD's available capacity. In addition, with implementation of RCM PS-1 as described above, it is expected that CSD would have sufficient capacity to accommodate new elementary level students generated with implementation of the Race Course Avoidance Alternative. The fees would be collected by the AUHSD and shared equally with the CSD.

The CESD had been experiencing a decline in enrollment between the 2016–2017 school year and the 2020–2021 school year; however, since the 2020–2021 school year, the school district has been experiencing a small increase in enrollment. The number of residential units allowed under the Race Course Avoidance Alternative within the CESD boundary would be the same as under the proposed project. The Applicant/Developer of future residential development projects allowed under the Race Course Avoidance Alternative would be required to pay such fees to reduce any impacts of new residential development on school services as provided in Section 65995 of the California Government Code (refer to Regulatory Compliance Measure RCM PS-1). Although in recent years the CESD has experience as slight increase in enrollment, because of the district's historic decline in enrollment, and with payment of development impact fees on a project-by-project basis, it is expected that CESD would have sufficient capacity to accommodate elementary school level students generated with implementation of the Race Course Avoidance Alternative, similar to the proposed project.

The LAUSD has also been experiencing a decline in enrollment since the 2016–2017 school year. The residential units allowed under the Race Course Avoidance Alternative within the LAUSD boundary would generate approximately 46 new elementary level students and approximately 18 new middle/high school level students, for a total of 64 new students, the same as the proposed project. This increase in students can be accommodated by the LAUSD. In addition,

⁵ Anaheim Union High School District (AUHSD). *Facilities Master Plan Update, 3.2 Planning Considerations; Enrollment Projections and Demographics*. 2022.



the Applicant/Developer of future residential development projects allowed under Race Course Avoidance Alternative would be required to pay such fees to reduce any impacts of new residential development on school services as provided in Section 65995 of the California Government Code (refer to Regulatory Compliance Measure RCM PS-1). With the LAUSD's continued pattern of decline in enrollment, and with payment of development impact fees on a project-by-project basis, it is expected that LAUSD would have sufficient capacity to accommodate new students generated with implementation of the Race Course Avoidance Alternative.

Pursuant to the provisions of Government Code Section 65996, a project's impact on school facilities is fully mitigated through payment of the requisite school facility development fees current at the time a building permit is issued. Therefore, with payment of the required fees, as outlined in Regulatory Compliance Measure PS-1, potential impacts to schools would be less than significant and slightly less than the proposed project.

Transportation. The Race Course Avoidance Alternative would facilitate the development of up to 2,161 housing units at the opportunity sites identified within the CTCC Specific Plan and CBPC Specific Plan areas and the LASP area while avoiding the essential features of the historic Los Alamitos Race Course within the CTCC Specific Plan area. Similar to the proposed project, implementation of the Race Course Avoidance Alternative would increase the number of vehicle trips to and from the opportunity sites, potentially impacting the surrounding circulation system. Given that the Race Course Avoidance Alternative would facilitate the development of 153 fewer housing units than the proposed project, the construction of the Race Course Avoidance Alternative would result in less transportation impacts than the proposed project. LOS and VMT analyses performed for the proposed project indicated that the proposed project would not exceed significance thresholds established by the City of Cypress and County of Orange. As the Race Course Avoidance Alternative would facilitate the development of 153 fewer housing units than the project and the proposed project would result in less than significant impacts relating to transportation, it is reasonable to assume that construction of the Race Course Avoidance Alternative would also result in less than significant impacts on transportation in the City. In addition, similar to the proposed project, compliance with the City's Municipal Code would address transportation design and emergency access associated with the Race Course Avoidance Alternative. In addition, similar to the proposed project, the Race Course Avoidance Alternative would not alter the existing circulation system in the City as any improvements needed to accommodate future residential units would be analyzed during site plan review and any circulation improvements such as driveway access and intersection controls would be implemented consistent with the City's Municipal Code.

Overall, the Race Course Avoidance Alternative's impacts associated with transportation would be less than significant, and slightly less than the proposed project.

Tribal Cultural Resources. The Race Course Avoidance Alternative would facilitate the development of up to 2,161 housing units at the opportunity sites identified within the CTCC Specific Plan and CBPC Specific Plan areas and the LASP area while avoiding the essential features of the historic Los Alamitos Race Course within the CTCC Specific Plan area. During the CEQA environmental review process, Native American consultation was conducted in compliance with SB 18 and AB 52 for the proposed project. Because the Tribal outreach process for the proposed project yielded no



knowledge of significant Tribal resources, it can reasonably be assumed that the proposed project, as well as the Race Course Avoidance Alternative, would not cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074.

Similar to the proposed project, because future development of the Race Course Avoidance Alternative's opportunity sites could require excavation and other potentially disturbing aspects of construction into soils, there is a potential to uncover undiscovered tribal cultural resources during excavation, including human remains. Therefore, while unlikely, the presence of undiscovered subsurface tribal cultural resources is possible, and these resources could potentially be affected by construction activities. As a result, similar to the proposed project, impacts to tribal cultural resources with implementation of the Race Course Avoidance Alternative are potentially significant without mitigation. Similar to the proposed project, the Race Course Avoidance Alternative would be required to comply with Regulatory Compliance Measures RCMs CUL-1 and CUL-2 in order to reduce potential impacts to previously undiscovered archaeological resources and human remains.

With the incorporation of Regulatory Compliance Measures RCMs CUL-1 and CUL-2, potential impacts to unknown tribal cultural resources with implementation of the Race Course Avoidance Alternative would be less than significant, and similar to the proposed project.

Utilities and Service Systems. The Race Course Avoidance Alternative would facilitate the development of up to 2,161 housing units at the opportunity sites identified within the CTCC and CBPC Specific Plan areas and the LASP area while avoiding the essential features of the historic Los Alamitos Race Course within the CTCC Specific Plan area. The Race Course Avoidance Alternative would result in a net increase of approximately 4,300 persons. Due to the decrease in the total number of housing units proposed under the Race Course Avoidance Alternative as compared to the proposed project (the Race Course Avoidance Alternative would facilitate the development of 153 fewer housing units), the Race Course Avoidance Alternative would increase the City's population by approximately 305 fewer persons than the anticipated population increase of 4,605 with implementation of the proposed project.

Water. Similar to the proposed project, any future projects implemented in accordance with the Race Course Avoidance Alternative would result in an increase in water demand at the opportunity sites. The GSWC West Orange Service Area 2020 UWMP states that in 2045, annual water use in its service area is expected to be 15,759 acre-feet and total water supplies available would be 23,645 acre-feet. According to CalEEMod projections, the proposed project would result in approximately 86,834,354 gallons per year (gpy) or 267 afy of indoor water use and account for 1.7 percent of the estimated water demand and 1.1 percent of the total available water supplies in the service area for 2045. As the Race Course Avoidance Alternative would facilitate the development of 153 fewer housing units than the project and the proposed project would result in less than significant impacts relating to water usage, it is reasonable to assume that construction of the Race Course Avoidance Alternative would also result in less than significant impacts on water usage in the City.

Additionally, similar to the proposed project, some of the units facilitated by the Race Course Avoidance Alternative would replace existing urban uses that currently use water, and all future projects would be required to demonstrate that existing public utilities would be sufficient to



serve the future projects' needs as part of their specific environmental review process. As such, the Race Course Avoidance Alternative's impacts would be less than significant and slightly less than the proposed project.

Wastewater. Similar to the proposed project, any future projects implemented in accordance with the Race Course Avoidance Alternative would result in an increase in wastewater generation at the opportunity sites. The OCSD, which is responsible for the provision of wastewater treatment facilities at the opportunity sites, has a capacity of treating 180 million gallons of wastewater per day from residential, commercial, and industrial sources at two plants: Reclamation Plant No. 1 in Fountain Valley and Treatment Plant No. 2 in Huntington Beach. Reclamation Plant No. 1 has a primary treatment capacity of 208 mgd, and is running under capacity at approximately 120 mgd. Reclamation Plant No. 2 has a primary treatment capacity of 168 mgd and currently receives 59 mgd. The proposed project is anticipated to generate approximately 240 acre-feet of wastewater annually, or 214,116 gallons of wastewater per day. This accounts for 0.11 percent of OCSD's daily capacity, 0.10 percent of the current capacity of Reclamation Plant No. 1, and 0.13 percent of the current capacity of Reclamation Plant No. 2. As the Race Course Avoidance Alternative would facilitate the development of 153 fewer housing units than the project and the proposed project would result in less than significant impacts relating to wastewater generation, it is reasonable to assume that construction of the Race Course Avoidance Alternative would also result in less than significant impacts on wastewater collection in the City.

Additionally, similar to the proposed project, some of the units facilitated by the Race Course Avoidance Alternative would replace existing urban uses that currently generate wastewater and all future projects would be required to demonstrate that existing public utilities would be sufficient to serve the future projects' needs as part of their specific environmental review process. As such, impacts would be less than significant and slightly less than the proposed project. No mitigation is required.

Stormwater/Drainage. Similar to the proposed project, any future projects implemented in accordance with the Race Course Avoidance Alternative which would disturb more than 1 acre of soil would comply with the requirements of the Construction General Permit and would include the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would include construction BMPs to control and direct on-site surface runoff and would include detention facilities, if required, to ensure that stormwater runoff from the construction site would not exceed the capacity of the stormwater drainage systems. If applicable, a SWPPP would also detail Erosion Control and Sediment Control BMPs to be implemented during project construction to minimize erosion and retain sediment on site. If a project would disturb less than 1 acre of soil, it would be subject to the requirements of Section 5.106 of the 2022 California Green Building Standards Code (CALGreen Code) requires projects that disturb less than 1 acre of soil and that are not part of a larger common plan to comply with the local municipal code and/or implement a combination of erosion and sediment control and good housekeeping BMPs to prevent pollution of stormwater runoff during construction activities.



Similar to the proposed project, the new development allowed under the Race Course Avoidance Alternative would also comply with the Orange County MS4 Permit, which requires the preparation of a Final WQMP and implementation of operational BMPs to target and reduce pollutants of concern in stormwater runoff from project sites. Compliance with the Orange County MS4 Permit would reduce operational impacts related to surface water quality standards, waste discharge requirements, and/or degradation of water quality to a less than significant level, and no mitigation is required.

Additionally, some of the units would replace existing urban uses that currently contribute to stormwater flows, similar to the proposed project. Any future projects implemented in accordance with the Race Course Avoidance Alternative would be required to adhere to the General Plan, provide required development impact fees, and comply with applicable development regulations pertaining to stormwater drainage. As a part of the development review process, all future projects would also be required to demonstrate that existing public utilities would be sufficient to serve the future projects' needs. As such, the Race Course Avoidance Alternative would not require the relocation or construction of new or expanded stormwater facilities or infrastructure. The Race Course Avoidance Alternative's impacts would be less than significant and similar to the proposed project. No mitigation is required.

Electric Power. Similar to the proposed project, any future projects implemented in accordance with the Race Course Avoidance Alternative would result in an increase in electricity use at the opportunity sites. The City is within the service territory of Southern California Edison (SCE), which provides services through a grid of transmission lines and related facilities. According to the California Energy Commission (CEC), total electricity consumption in the SCE service area in 2021 was 81,129 GWh. Total electricity consumption in Orange County in 2021 was 18,932 GWh (7,272 GWh for the residential sector and 11,660 GWh for the non-residential sector). Based on the CalEEMod outputs for the proposed project, the estimated electricity demand associated with the operation of the new residential development allowed under the proposed project is approximately 8,482,740 kilowatt-hours (kWh) per year, and approximately 0.01 and 0.04 percent of the annual electricity consumption in the SEC service area and Orange County, respectively. As the Race Course Avoidance Alternative would result in the facilitation of 153 less housing units as compared to the project and the proposed project would result in less than significant impacts relating to electricity consumption, it is reasonable to assume that construction of the Race Course Avoidance Alternative would also result in less than significant impacts on electricity consumption in the City.

Additionally, similar to the proposed project, some of the housing units facilitated by the Race Course Avoidance Alternative would replace existing urban uses that currently use electricity, and all future projects would be required to demonstrate that existing public utilities would be sufficient to serve the future projects' needs as part of their specific environmental review process. As such, the Race Course Avoidance Alternative's impacts would be less than significant and slightly less than the proposed project. No mitigation is required.

Natural Gas. Similar to the proposed project, any future projects implemented in accordance with the Race Course Avoidance Alternative would result in an increase in natural gas use at the opportunity sites. The City is within the service territory of Southern California Gas Company



(SoCalGas). According to the CEC, total natural gas consumption in the SoCalGas service area in 2021 was 5,101 million therms (2,261 million therms for the residential sector and 937 million therms for the commercial sector) and total natural gas consumption in Orange County in 2021 was 580 million therms (362 million therms for the residential sector and 218 therms for the non-residential sector). Based on the CalEEMod outputs for the proposed project, the estimated potential increase in natural gas demand at the opportunity sites is anticipated to be approximately 25,701,324 kBtu per year, approximately 257,075 therms per year, and approximately 0.005 and 0.04 percent of the annual natural gas consumption in the SoCalGas service area and Orange County, respectively. As the Race Course Avoidance Alternative would facilitate the development of 153 fewer housing units than the project and the proposed project would result in less than significant impacts relating to natural gas consumption, it is reasonable to assume that construction of the Race Course Avoidance Alternative would also result in less than significant impacts on natural gas consumption in the City.

Additionally, similar to the proposed project, some of the housing units facilitated by the Race Course Avoidance Alternative would replace existing urban uses that currently use natural gas, and all future projects would be required to demonstrate that existing public utilities would be sufficient to serve the future projects' needs as part of their specific environmental review process. As such, the Race Course Avoidance Alternative's impacts would be less than significant and slightly less than the proposed project. No mitigation is required.

Telecommunication Facilities. Telephone, television, and internet services are offered by a variety of providers in the City. Similar to the proposed project, any future projects that would be developed in accordance with the Race Course Avoidance Alternative would be responsible for constructing adequate tele-communication facility extensions on their respective project sites. The construction and expansion of these facilities would occur on site during the site preparation and earthwork phase and are not expected to impact any telephone, cable, or internet services offsite that serve the surrounding areas. Additionally, telecommunication facilities are generally installed concurrently with utility expansions and impacts associated with the expansion of telecommunications facilities are already considered in the air quality, noise, and construction traffic analysis. Therefore, the Race Course Avoidance Alternative's impacts associated with the relocation or construction of new or expanded telecommunication facilities and impacts would be less than significant and similar to the proposed project. No mitigation is required.

Solid Waste. Similar to the proposed project, any future projects implemented in accordance with the Race Course Avoidance Alternative would result in an increase in solid waste generation at the opportunity sites. Currently, OCWR, which provides solid waste disposal at the opportunity sites, maintains and operates three Class III sanitary landfills including the Frank R. Bowerman Landfill, Olinda Alpha Landfill, and Prima Deshecha Landfill. According to CalEEMod calculations, the future residential developments facilitated by the proposed project would generate approximately 1,711 tons of solid waste per year and represents 0.04 percent, 0.06 percent, and 0.1 percent of the daily permitted tonnage of the Frank R. Bowerman Landfill, Olinda Alpha Landfill, and Prima Deshecha Landfill, respectively. As the Race Course Avoidance Alternative would facilitate the development of 153 fewer housing units than the project and



the proposed project would result in less than significant impacts relating to solid waste generation, it is reasonable to assume that construction of the Race Course Avoidance Alternative would also result in less than significant impacts on solid waste collection in the City.

Additionally, similar to the proposed project, some of the housing units facilitated by the Race Course Avoidance Alternative would replace existing urban uses that currently generate solid waste, and all future projects would be required to demonstrate that existing public utilities would be sufficient to serve the future projects' needs as part of their specific environmental review process. As such, the Race Course Avoidance Alternative's impacts would be less than significant and less than the proposed project.

5.5.3.3 Overview of Potential Impact/Comparison to Proposed Project

The Race Course Avoidance Alternative would accommodate up to 2,161 housing units at the opportunity sites, 153 less than the proposed project. Environmental impacts associated with implementation of the Race Course Avoidance Alternative on air quality, cultural resources, energy, greenhouse gas emissions, land use and planning, noise, population and housing, public services, transportation, and utilities and service systems would be similar or slightly less than the proposed project. In addition, the significant and unavoidable impacts on air quality would still occur.

5.5.3.4 Attainment of Project Objectives

The Race Course Avoidance Alternative would either not meet project objectives or be inferior to the proposed project in meeting the project objectives. The attainment of project objectives is discussed further below.

1. Provide consistency between the 2021–2029 Housing Element, the City's General Plan, the LASP, the CTCC Specific Plan, the CBPC Specific Plan, and the City's Zoning Ordinance.

The Race Course Avoidance Alternative would not provide consistency between the 2021–2029 Housing Element, the City's General Plan, the LASP, the CTCC Specific Plan, the CBPC Specific Plan, and the City's Zoning Ordinance as the alternative would not implement either of the alternatives identified in the 2021–2029 Housing Element to the full extent. As such, the Reduced Intensity Alternative would not meet Project Objective 1.

2. Meet the City's housing needs as identified in the Regional Housing Needs Assessment Requirement (3,936 new housing units).

Although the Race Course Avoidance Alternative would technically meet the City's housing needs as identified in the RHNA requirement (3,936 new housing units) as the alternative would facilitate the development of up to 2,161 residential units at the opportunity sites. In addition to the 1,946 units already accommodated under existing zoning within the City, implementation of the Race Course Avoidance Alternative would increase the residential development capacity in the City to a total of 4,107 housing units. As such, the Race Course Avoidance Alternative would meet Project Objective 2; however, because the Race Course Avoidance Alternative would allow for fewer housing units, it would not provide the same buffer of additional housing units to ensure compliance with the State's "no net loss" housing law, which requires that cities and counties maintain a sufficient supply of adequate potential housing sites to accommodate its



remaining unmet RHNA by each income category at all times throughout the entire 2021–2029 Housing Element planning period. Consequently, the Race Course Avoidance Alternative would be inferior to the proposed project in meeting Project Objective 2.

3. Implement sustainable planning and development practices by creating compact new developments and walkable neighborhoods to minimize the City’s contribution to greenhouse gas emissions (GHGs) and energy usage.

The Race Course Avoidance Alternative would facilitate compact new development and walkable neighborhoods in the City; however, it would do so at a reduced scale compared to the proposed project. The reduction in housing units would decrease the extent of the compact new developments and walkable neighborhoods. As such, the Race Course Avoidance Alternative would be inferior to the proposed project in meeting Project Objective 3.

4. Promote changes in land use and development that reflect changes in the regional economy. Promote land uses that transform now-vacant or under-utilized sites.

The Race Course Avoidance Alternative would facilitate changes in land use and development that reflect changes in the regional economy and promote land uses that transform now vacant or under-utilized sites; however, it would do so at a reduced scale compared to the proposed project because some of the opportunity sites would not be redeveloped. The reduction in housing units would decrease the extent of the land use changes. As such, the Race Course Avoidance Alternative would be inferior to the proposed project in meeting Project Objective 4.

5. Provide high-quality housing in a variety of forms, sizes, and densities to serve the diverse population of the City.

The Race Course Avoidance Alternative would facilitate the provision of high-quality housing in a variety of forms, sizes, and densities to serve the diverse population of the City; however, it would do so at a reduced scale compared to the proposed project. The reduction in housing units would decrease the accommodation of a variety of housing types to meet the needs of all City residents. As such, the Race Course Avoidance Alternative would be inferior to the proposed project in meeting Project Objective 5.

6. Fulfill the intent of the voter approved Measure A, which approved the Cypress Town Center and Commons Specific Plan 2.0 (CTCC Specific Plan)

Measure A, which approved the CTCC Specific Plan in June 2018, allowed for development of a town center, single-family, senior and multi-family housing, and public park space of portions of the Los Alamitos Race Course, the former Cypress Golf Club, and an adjacent property. Under the Race Course Avoidance Alternative, opportunity sites within the Cypress Town Center and Commons (CTCC) Specific Plan 2.0 would not include development on the areas where the essential features of the Los Alamitos Race Course, including the track, grandstand, and race course entry, are located. Implementation of the Race Course Avoidance Alternative would remove approximately 39.2 acres of CTCC Specific Plan area from future development and would reduce the total number of housing units within the CTCC Specific Plan area by approximately 153 units. As such, although the CTCC Specific Plan area would be developed with a town center and housing pursuant to Measure A, it would be at a reduced scale as



compared to the proposed project. As such, the Race Course Avoidance Alternative would not meet Project Objective 6 because the CTCC Specific Plan as approved by the voters would not be implemented.

5.6 IDENTIFICATION OF ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the identification of an Environmentally Superior Alternative among the proposed project and the alternatives evaluated in an EIR. *State CEQA Guidelines* Section 15126.6(e)(2) provides that, if the No Project Alternative is the Environmentally Superior Alternative, then the EIR shall also identify an Environmentally Superior Alternative among the other alternatives and the proposed project. Table 5.E provides, in summary format, a comparison of the level of impacts of each alternative to the proposed project.

The No Project Alternative would have the least impact on the environment as the opportunity sites would remain in their existing conditions and would thereby avoid most of the proposed project's environmental impacts. However, the No Project Alternative would not provide accommodation for the City's RHNA allocation and the City would not be able to meet its housing obligations as defined by the State RHNA allocations. Because local jurisdictions are required by State law (Government Code Section 65580 et seq.) to plan for their fair share of projected housing construction needs in their region and implementation of the No Project Alternative would not meet this requirement, a No Project Alternative was considered and rejected by the City of Cypress. In addition, the No Project Alternative cannot be the only Environmentally Superior Alternative. As such, the EIR shall also identify the proposed project or one of the other alternatives as the Environmentally Superior Alternative.

As shown in Table 5.E, below, all impacts under the Reduced Intensity Alternative would be similar to or less than the proposed project. The Reduced Intensity Alternative would result in reduced impacts on the environment because the opportunity sites would be developed at a reduced density, thereby reducing most of the proposed project's environmental impacts. However, the Reduced Intensity Alternative would either not meet the project objectives or meet them to a lesser extent than the proposed project. Most notably, the Reduced Intensity Alternative would not meet the RHNA requirement of 3,936 housing units as required by State law (Government Code Section 65580 et seq.).

In addition, as shown in Table 5.E, below, all impacts under the Race Course Avoidance Alternative would be similar to or less than the proposed project. The Race Course Avoidance Alternative would result in reduced impacts on the environment because the opportunity sites within the CTCC would be developed at a reduced density in order to preserve the essential features of the Los Alamitos Race Course, thereby reducing most of the proposed project's environmental impacts. However, the Race Course Avoidance Alternative would either not meet the project objectives or meet them to a lesser extent than the proposed project. Most notably, the Race Course Avoidance Alternative would not fulfill the intent of the voter approved Measure A, which approved the CTCC Specific Plan.



Table 5.E: Comparison of the Environmental Impacts of the Proposed Project and Project Alternatives

Impact Area	Proposed Project Impact with Mitigation (if any)	Reduced Intensity Alternative	Alternative 2: Lincoln Avenue Specific Plan Mixed Density	Race Course Avoidance Alternative
Air Quality	Significant and Unavoidable	Less ²	Similar ²	Less ²
Cultural Resources	Less Than Significant	Less	Similar	Less
Energy	Less Than Significant	Less	Greater	Less
Greenhouse Gas Emissions	Less Than Significant ¹	Less ¹	Greater ¹	Less ¹
Land Use and Planning	Less Than Significant	Similar	Similar	Similar
Noise	Less Than Significant	Less	Greater	Less
Population and Housing	Less than Significant	Less	Greater	Less
Public Services	Less than Significant	Less	Similar/Greater	Less
Tribal Cultural Resources	Less than Significant	Similar	Similar	Similar
Transportation	Less Than Significant	Less	Greater	Less
Utilities and Service Systems	Less than Significant	Less	Similar/Greater	Less

Source: LSA (2024).

¹ Mitigation identified.

² Impacts would continue to be significant and unavoidable, however overall impacts would be less than the proposed project.



As such, the proposed project is the Environmentally Superior Alternative. With the exception of air quality, implementation of the proposed project would result in less than significant impacts on the environmental impact areas analyzed in this PEIR. In contrast, implementation of Alternative 2 would result in similar significant and unavoidable impacts on air quality, and greater environmental impacts associated with energy, greenhouse gas emissions, noise, population and housing, public services, tribal cultural resources, transportation, and utilities and service systems.

Further, implementation of the proposed project would meet all of the identified project objectives, including meeting the City's RHNA requirement of 3,936 housing units as required by State law (Government Code Section 65580 et seq.). Accordingly, it is determined that the proposed project is the Environmentally Superior Alternative because implementation would result in the least environmental impacts while meeting all of the project's objectives.



6.0 OTHER CEQA CONSIDERATIONS

Section 15126.2(c) of the *State CEQA Guidelines* requires that an Environmental Impact Report (EIR) describe any significant impacts that cannot be avoided in all phases of a project, including: planning, acquisition, development, and operation. This chapter discusses these CEQA considerations associated with the implementation of the proposed 2021–2029 Cypress Housing Element Implementation Project (proposed project). Specifically, Section 15126.2(c) states that an EIR shall:

“Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.”

According to Section 15126 of the *State CEQA Guidelines*, an EIR must include the following as part of its analysis, as addressed in this chapter:

1. Significant short- and long-term environmental effects associated with project implementation (Section 6.1, Short-and Long-Term Implications);
2. Significant environmental effects due to wasteful, inefficient, or unnecessary consumption use of energy, or wasteful use of energy resources (Section 6.2, Energy Impacts);
3. Significant environmental effects that cannot be avoided if the proposed project is implemented (Section 6.3, Summary of Significant Unavoidable Impacts);
4. Significant irreversible environmental changes that would result from implementation of the proposed project (Section 6.4, Significant Irreversible Environmental Changes); and
5. Growth-inducing impacts resulting from implementation of the proposed project (Section 6.5, Growth-Inducing Impacts).

6.1 SHORT-AND LONG-TERM IMPLICATIONS

Section 15126.2(a) of the *State CEQA Guidelines* requires that an EIR identify and focus on the significant effects of the proposed project on the environment. Specifically, Section 15126.2(a) states that an EIR shall:

Direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short-term and long-term effects. The discussion should include relevant specifics of the area, the resources involved, physical changes, alterations to ecological systems, and changes induced in population distribution, population concentration, the human use of the land (including commercial and residential development), health and safety problems caused by the physical changes, and other aspects of the resource base such as water, historical resources, scenic quality, and public services. The EIR shall also analyze any



significant environmental effects the project might cause or risk exacerbating by bringing development and people into the area affected.

The proposed project involves the approval of updates to the City of Cypress' (City) General Plan Land Use Element, the Lincoln Avenue Specific Plan (LASP), the Cypress Town Center and Commons Specific Plan 2.0 (CTCC Specific Plan), the Cypress Business and Professional Center Specific Plan (CBPC Specific Plan), and the Zoning Ordinance. The updates to each document would function to ensure consistency with the 2021–2029 City of Cypress General Plan Housing Element Update and establish the necessary zoning and land use designations in order to accommodate all 3,936 housing units allocated by the Southern California Association of Governments' (SCAG) Regional Housing Needs Assessment (RHNA) to the City for its 6th Cycle Planning Period.

Although the project proposes these updates, future project-specific design details facilitated by approval of these updates are unknown at this time. The proposed project involves the adoption of citywide programmatic policy documents; future project-specific actions would be subject to further environmental review and the regulations contained in the adopted General Plan.

The proposed project would not include any physical changes or alterations to ecological systems. The proposed project would induce changes in population distribution, population concentration, and the human use of land due to the residential zoning overlays that would allow for denser housing on the opportunity sites. However, the proposed project itself would not result in any new or expanded development. Although the proposed project would indirectly bring potential development or population into the City, the proposed project would not result in any significant environmental impacts because future development allowed under the proposed zoning and land use changes would accommodate planned regional housing growth included in the SCAG RHNA. The proposed project would not include or facilitate any new physical improvements or development. Therefore, implementation of the proposed project would not create potential short-term or long-term direct or indirect significant effects.

6.2 ENERGY IMPACTS

According to Section 15126.2(b) of the *State CEQA Guidelines*, “[i]f analysis of the project’s energy use reveals that the project may result in significant environmental effects due to wasteful, inefficient, or unnecessary consumption use of energy, or wasteful use of energy resources, the EIR shall mitigate that energy use.”

As described in Section 4.3, Energy, the proposed project would result in less than significant impacts related to energy use.

The proposed project would not, in and of itself entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Construction activities associated with the development of additional housing units could occur through the horizon year 2045, which would cause short-term emissions of criteria air pollutants. Transportation energy represents the largest energy use during construction and would occur from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction worker vehicles that would use petroleum fuels (e.g., diesel fuel and/or gasoline). Project construction would have a



negligible effect on local and regional energy supplies. Furthermore, impacts related to energy use during construction would be temporary and relatively small in comparison to Orange County's overall use of the State's available energy resources. In addition, compliance with State regulations would reduce the inefficient, wasteful, or unnecessary consumption of energy.

Operational activities associated with the additional housing units would result in energy demand associated with natural gas use, electricity consumption, and fuel used for vehicle trips. Operation of the proposed project would negligibly increase the annual natural gas consumption in Orange County by approximately 0.1 percent. Further, operation of the proposed project would negligibly increase the annual electricity consumption in Orange County by 0.1 percent. Electrical and natural gas demand associated with project operations would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. Vehicle trips associated with the proposed project would increase the annual fuel use in Orange County by approximately 0.1 percent for gasoline fuel usage and approximately 0.1 percent for diesel fuel usage. Fuel consumption associated with vehicle trips generated by project operations would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region.

The text changes in the General Plan Land Use Element would not facilitate or entitle any physical development that would result in energy impacts. The text changes to the Zoning Ordinance would ensure compliance with new state laws and resolve potential inconsistencies resulting from adoption of the 2021–2029 Housing Element. The text changes to the three relevant Specific Plans (the LASP, the CBPC Specific Plan, and the CTCC Specific Plan) also represent a planning action intended to ensure consistency with the changes to other relevant City planning documents. The aforementioned changes would not facilitate or entitle any physical development that would result in energy impacts. Therefore, impacts to energy would be less than significant, and no mitigation is required.

6.3 SUMMARY OF SIGNIFICANT UNAVOIDABLE IMPACTS

The Executive Summary of this document (Chapter 1.0) contains a detailed summary that identifies the proposed project's environmental impacts as compared to existing conditions, proposed mitigation measures, and the level of significance of any impacts after mitigation. The following is a summary of impacts considered significant, adverse, and unavoidable after all mitigation is applied. These impacts are also described in detail in Chapter 4.0, Existing Environmental Setting, Environmental Analysis, Impacts, and Mitigation Measures.

6.3.1 Conflict with Applicable Air Quality Plan

Given that the proposed project would result in long-term operational pollutant emissions that would violate Indicator 1 of consistency with the 2022 Air Quality Management Plan (AQMP), the project would result in a significant and unavoidable impact by conflicting with or obstructing implementation of an applicable air quality plan. Mitigation is proposed to require the implementation of all feasible measures to reduce operational impacts associated with the proposed project, but there is no feasible mitigation to reduce operational pollutant emissions to a less than significant level. Therefore, impacts to air quality would remain significant and unavoidable.



6.3.2 Criteria Pollutant Net Increase in Nonattainment Region

Given that the proposed project would enable future development projects that may exceed South Coast Air Quality Management District (SCAQMD) thresholds, the project would result in a significant and unavoidable impact by causing a cumulatively considerable net increase of a criteria pollutant or which the project region is nonattainment under an applicable federal or state ambient air quality standard. Mitigation is proposed to reduce criteria air pollutant emissions generated during operational activities associated with the proposed project. However, there is currently not enough information to quantify emissions of specific project development that may occur under the proposed project. Without quantification to guarantee a less than significant finding, future development projects may still exceed the SCAQMD regional significance thresholds, and project impacts would remain significant and unavoidable.

6.4 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2 (d) of the *State CEQA Guidelines* requires that an EIR consider and discuss significant irreversible changes that would be caused by implementation of the proposed project. Specifically, Section 15126.2 (d) states:

“Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irrecoverable commitments of resources should be evaluated to assure that such current consumption is justified.”

Generally, a project would result in significant irreversible environmental changes if the proposed consumption of resources is not justified, if the project would involve a large commitment of nonrenewable resources, or if the project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project.

The proposed Specific Plan, General Plan, and Zoning Ordinance amendments are considered planning/policy actions and do not include or facilitate any physical improvements or development. The commitment of limited, slowly renewable, and nonrenewable resources required for construction and operation of future development would limit the availability of these resources for future generations or for other uses during the life of the project. However, the proposed project would not result in an irreversible commitment of these resources, as the proposed project would not, in itself, result in any direct physical improvements or development. Therefore, the proposed project would not result in a commitment of limited, slowly renewable, and nonrenewable resources, and thus, would not result in significant irreversible changes.

6.5 GROWTH-INDUCING IMPACTS

Sections 15126(d) and 15126.2(e) of the *State CEQA Guidelines* require that an EIR analyze growth-inducing impacts and discuss the ways in which a proposed project could foster economic or



population growth or construction of additional housing, either directly or indirectly, in the surrounding environment. This section examines ways in which the proposed project could foster economic or population growth, or the construction of additional housing either directly or indirectly in the surrounding environment. *State CEQA Guidelines* Section 15126.2(d) also requires a discussion of the characteristics of projects that may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. To address these issues, potential growth-inducing effects were examined through analysis of the following questions:

- Would the project remove obstacles to, or otherwise foster, population growth (e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development)?
- Would the project foster economic growth?
- Would approval of the project involve some characteristic that may encourage and facilitate other activities that could significantly affect the environment?

Growth-inducing effects are not to be construed as necessarily beneficial, detrimental, or of little significance to the environment (*State CEQA Guidelines*, Section 15126.2(e)). This issue is presented to provide additional information on ways in which the proposed project could contribute to significant changes in the environment beyond the direct consequences of developing the proposed land uses as described in earlier sections of this Draft Program EIR (PEIR).

6.5.1 Removal of Obstacles to, or Otherwise Foster, Population Growth

Approval of the amendments to the City's General Plan Land Use Element, relevant Specific Plans, and Zoning Ordinance/Zoning Map are considered policy/planning actions and do not include or facilitate any physical improvements or development. The proposed zoning changes would allow for the development of residential uses on the opportunity sites. Future development that would be built in accordance with these amendments would be designed to meet the City's housing need allocation for the planning period between 2021 and 2029 of 3,936 housing units as determined by the SCAG RHNA. As such, the proposed project is consistent with planned regional housing growth and planned population growth of the City. Future residential uses would replace existing land uses and not would not induce additional growth or require the extension of roads or other infrastructure because the roads and infrastructure are already in place with adequate capacity to serve the opportunity sites. Therefore, the proposed project would not cause indirect substantial unplanned population growth through the extension of roads and other infrastructure. Impacts associated with unplanned population growth, directly or indirectly, would be less than significant and no mitigation would be necessary.

6.5.2 Foster Economic Growth

The proposed project seeks to establish consistency between the City's 2021–2029 General Plan Housing Element Update and other applicable land use documents. Under this new Housing Element, the City identifies opportunity sites with the potential to accommodate the City's unaccommodated housing need of 1,990 housing units in order to meet its RHNA allocation of 3,936



housing units. As discussed in Section 4.7.3.3, Regional Regulations, in Section 4.7, Population and Housing, of this Draft PEIR, the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), from which the RHNA is derived, takes into account demographic and economic changes that have occurred since the adoption of the 2016–2040 RTP/SCS. As a result, at least some degree of economic growth has already been accounted for by the 2020–2045 RTP/SCS and RHNA. Therefore, the land use changes included under the proposed project would represent a response to the City’s economic growth rather than a source of it.

Modest economic growth could be expected from the proposed project’s updated high-density residential zoning along the Lincoln Avenue Corridor because it would allow for residential occupation within walking distance of existing commercial retail establishments. As discussed in Table 4.5.D, Lincoln Avenue Specific Plan Consistency Analysis, in Section 4.5, Land Use and Planning, this close proximity would encourage walkability within the area and could therefore provide the retail establishments with an expanded consumer base and potentially increase commercial activity along the corridor. However, this increased commercial activity would not be substantial enough to warrant a significant change in economic growth. As a result, the proposed project is not considered to foster economic growth, and therefore, the proposed project would not result in any economic growth-inducing impacts.

6.5.3 Other Characteristics

Approval of the proposed project would not involve any characteristics that may encourage and facilitate other activities that could significantly affect the environment.



7.0 MITIGATION MONITORING AND REPORTING PROGRAM

7.1 MITIGATION MONITORING REQUIREMENTS

California Public Resources Code (PRC) Section 21081.6, which is part of the California Environmental Quality Act (CEQA) statute, mandates that the following requirements shall apply to all reporting or mitigation monitoring programs:

- The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes that have been required or incorporated into the project at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so requested by the lead agency or a responsible agency, prepare and submit a proposed reporting or monitoring program.
- The lead agency shall specify the location and custodian of the documents or other materials that constitute the record of proceedings upon which its decision is based.
- The lead agency shall provide measures to mitigate or avoid potentially significant effects on the environment that are fully enforceable through permit conditions, agreements, or other measures. Conditions of project approval may be set forth in referenced documents that address required mitigation measures or, in the case of the adoption of a plan, policy, regulation, or other project, by incorporating the mitigation measures into the plan, policy, regulation, or project design.
- Prior to the close of the public review period for a draft environmental impact report, a responsible agency, or a public agency having jurisdiction over natural resources affected by the project, shall either (1) submit to the lead agency complete and detailed performance objectives for mitigation measures that would address the significant effects on the environment identified by the responsible agency or agency having jurisdiction over natural resources affected by the project, or (2) refer the lead agency to appropriate, readily available guidelines or reference documents. Any mitigation measures submitted to a lead agency by a responsible agency or an agency having jurisdiction over natural resources affected by the project shall be limited to measures that mitigate impacts to resources that are subject to the statutory authority of, and definitions applicable to, that agency. Compliance or noncompliance with that requirement by a responsible agency or agency having jurisdiction over natural resources affected by a project shall not limit the authority of the responsible agency or agency having jurisdiction over natural resources affected by a project, or the authority of the lead agency, to approve, condition, or deny projects as provided by this division or any other provision of law.



7.2 MITIGATION MONITORING PROCEDURES

The mitigation monitoring and reporting program for the proposed 2021–2029 Cypress Housing Element Implementation Project (proposed project) has been prepared in compliance with PRC Section 21081.6. It describes the requirements and procedures to be followed by the City of Cypress (City), as the Lead Agency, to ensure that all mitigation measures adopted as part of the proposed project will be carried out as described in the Final Program Environmental Impact Report (PEIR).

Table 7.A sets forth the proposed mitigation monitoring and reporting program. It lists each of the mitigation measures specified in this Draft PEIR and identifies the party or parties responsible for implementation and monitoring of each measure.

7.3 REGULATORY COMPLIANCE MONITORING PROCEDURES

Table 7.B lists all regulatory compliance measures associated with the proposed project as specified in the Initial Study (provided in Appendix A of this Draft PEIR) and describes the requirements and procedures to be followed by the City to ensure that all standard conditions will be carried out as described in this Draft PEIR.



Table 7.A: Mitigation Monitoring and Reporting Program

Mitigation Measures	Monitoring Milestone	Responsible Party	Verification of Compliance		
			Initials	Date	Remarks
4.1: Air Quality					
<p>MM AQ-1: Prior to issuance of building permits, the City of Cypress shall identify project design details and specifications, where feasible, to document implementation and compliance with the following emission reduction measures. Implementation of the following measures, where applicable, are considered to be applicable, feasible, and effective in reducing criteria pollutant emissions generated by the project:</p> <ul style="list-style-type: none"> All Project Applicants shall incorporate design features (e.g., pollution prevention, pollution reduction, barriers, landscaping, ventilation systems, or other measures) at the proposed residential uses to minimize the potential impacts of air pollution on sensitive receptors. All Project Applicants shall incorporate fuel-efficient heating equipment and other appliances, such as water heaters, swimming pool heaters, cooking equipment, refrigerators, furnaces, boiler units, and low or zero-emitting architectural coatings. Utilize only Energy Star heating, cooling, and lighting devices, and appliances. All Project Applicants shall utilize energy-efficient design features, including appropriate site orientation, use of lighter color roofing and building materials, and use of deciduous shade trees and windbreak trees to reduce fuel consumption for heating and cooling. All Project Applicants shall provide Class I and Class II bicycle parking/storage facilities on site. Bicycle parking facilities should be near destination points and easy to find. At least one bicycle parking space for every 20 vehicle parking spaces should be provided. All Project Applicants shall provide building access and paths which are physically separated from street parking lot traffic and that eliminate physical barriers such as walls, berms, landscaping and slopes that impede the use of pedestrians, bicycle facilities, or public transportation vehicles. 	Prior to issuance of building permits	City of Cypress / Project Applicant			



Table 7.A: Mitigation Monitoring and Reporting Program

Mitigation Measures	Monitoring Milestone	Responsible Party	Verification of Compliance		
			Initials	Date	Remarks
<ul style="list-style-type: none"> Where feasible, Project Applicants shall link cul-de-sacs and dead-end streets to encourage pedestrian and bicycle travel. Where feasible, Project Applicants shall provide traffic reduction modifications to Project roads, such as: narrower streets, speed platforms, bulb-outs, and intersection modifications designed to reduce vehicle speeds and to encourage pedestrian and bicycle travel. All Project Applicants shall provide a display case or kiosk displaying transportation information in a prominent area accessible to employees, residents, or visitors. All Project Applicants shall display bike route maps, bus schedules, and any other transportation information such as carpooling and car sharing. All Project Applicants shall provide preferential parking spaces near the entrance of buildings for those who carpool/vanpool/rideshare and provide signage. Project Applicants shall install 240-volt electrical outlets or Level 3 chargers in parking lots that would enable charging of neighborhood electric vehicles (NEVs) and/or battery powered vehicles. Project Applicants shall maximize the planting of trees in landscaping and parking lots. Project Applicants shall use light-colored paving and roofing materials. 					
4.4: Greenhouse Gas Emissions					
<p>MM GHG-1: Prior to discretionary approval by the City of Cypress for residential development projects subject to CEQA (California Environmental Quality Act) review (i.e., nonexempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project-related greenhouse gas (GHG) impacts to the City of Cypress for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology. If project-related GHG emissions exceed applicable SCAQMD thresholds of</p>	<p>Prior to discretionary approval by the City</p>	<p>Project Applicant</p>			



Table 7.A: Mitigation Monitoring and Reporting Program

Mitigation Measures	Monitoring Milestone	Responsible Party	Verification of Compliance		
			Initials	Date	Remarks
significance and/or Statewide GHG reduction targets, the City of Cypress shall require that applicants for new development projects incorporate mitigation measures to reduce GHG emissions. Mitigation measures could include, but are not limited, to energy efficiency measures, water conservation and efficiency measures, solid waste measures, and transportation and motor vehicles measures. The identified measures shall be included as part of the conditions of approval.					



Table 7.B: Regulatory Compliance Measures as Specified in the Initial Study

Regulatory Compliance Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance			
			Initials	Date	Remarks	
4.1: Air Quality						
RCM AQ-1	Emission Reduction Measures. During clearing, grading, earth moving, or excavation operations, excessive fugitive dust emissions shall be controlled by regular watering or other dust preventative measures by using the following procedures, in compliance with South Coast Air Quality Management District (SCAQMD) Rule 403 during construction. The applicable Rule 403 measures are as follows: <ul style="list-style-type: none"> • Apply nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more). • Water active sites at least twice daily (locations where grading is to occur shall be thoroughly watered prior to earthmoving). • Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 2 feet (0.6 meter) of freeboard (vertical space between the top of the load and the top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114. • Pave construction access roads at least 100 feet (30 meters) onto the site from the main road. • Reduce traffic speeds on all unpaved roads to 15 miles per hour or less. 	During clearing, grading, earth moving, or excavation operations	Project Applicant			
RCM AQ-2	Material Hauling. All trucks that are to haul excavated or graded material shall comply with State Vehicle Code Section 23114, with special attention to Sections 23114(b)(F), (e)(2), and (e)(4) as amended, regarding the prevention of such material spilling onto public streets and roads.	During construction	Project Applicant			



Table 7.B: Regulatory Compliance Measures as Specified in the Initial Study

Regulatory Compliance Measures		Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
RCM AQ-3	<p>Construction Painting. Prior to approval of future project plans and specifications, the City of Cypress shall confirm that the construction bid packages specify:</p> <ul style="list-style-type: none"> Contractors shall use high-volume low-pressure paint applicators with a minimum transfer efficiency of at least 50 percent; Coatings and solvents that will be utilized have a volatile organic compound content lower than required under SCAQMD Rule 1113; and To the extent feasible, construction/building materials shall be composed of pre-painted materials. 	Prior to approval of future project plans and specifications	Project Applicant			
RCM AQ-4	<p>Air Contaminant Discharge. Future projects shall comply with SCAQMD Rule 402. Rule 402 prohibits the discharge of air contaminants or other material from any type of operations, which can cause nuisance or annoyance to any considerable number of people or to the public or which endangers the comfort or repose of any such persons, or the public.</p>	During operation of future projects	Project Applicant			
RCM AQ-5	<p>All future projects shall comply with the latest Energy Code and Title 24 solar requirements for new residential development.</p>	During operation of future projects	Project Applicant			
4.4: Biological Resources						
RCM BIO-1	<p>Nesting Bird Survey and Avoidance. If vegetation removal, construction, or grading activities are planned to occur within the active nesting bird season (February 1 through August 31), the City of Cypress, or designee, shall confirm that the future Applicant has retained a qualified biologist who shall conduct a preconstruction nesting bird survey no more than 3 days prior to the start of such activities. The nesting bird survey shall include the work area and areas adjacent to the site (within 500 feet, as</p>	Prior to vegetation removal, construction, or grading activities during the active nesting bird season (February 1 through August 31)	Project Applicant			



Table 7.B: Regulatory Compliance Measures as Specified in the Initial Study

Regulatory Compliance Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
feasible) that could potentially be affected by project-related activities such as noise, vibration, increased human activity, and dust, etc. For any active nest(s) identified, the qualified biologist shall establish an appropriate buffer zone around the active nest(s). The appropriate buffer shall be determined by the qualified biologist based on species, location, and the nature of the proposed activities. Project activities shall be avoided within the buffer zone until the nest is deemed no longer active, as determined by the qualified biologist.					
RCM BIO-2	Landmark Tree Removal. The Director of the City of Cypress (City) Community Development Department, or designee, shall review and approve the removal of any trees required by future development associated with the Draft Housing Element implementation and rezoning program. As specified in the City Municipal Code Section 17-19, the property owner of a landmark tree shall submit a written request for review and consideration of the landmark tree removal and replacement plan at least 30 days prior to said removal. Public notice of a proposed landmark tree removal shall be posted next to or on the subject landmark tree, at the local public library, and at the Cypress City Hall during the entire 30-day application-processing period. No trees on the proposed project site shall be removed prior to the approval of a landmark tree removal permit by the Director of the City of Cypress Community Development Department, or designee.	Prior to removal of any trees	Project Applicant		



Table 7.B: Regulatory Compliance Measures as Specified in the Initial Study

Regulatory Compliance Measures		Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
4.5: Cultural Resources						
RCM CUL-1	Unknown Archaeological Resources. In the event that archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified archaeologist from the Orange County List of Qualified Archaeologists has evaluated the find in accordance with federal, State, and local guidelines to determine whether the find constitutes a “unique archaeological resource,” as defined in Section 21083.2(g) of the California Public Resources Code (PRC). The Applicant and its construction contractor shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the project site. Any found deposits shall be treated in accordance with federal, State and local guidelines, including those set forth in PRC Section 21083.2. Prior to commencement of grading activities, the Director of the City of Cypress (City) Community Development Department, or designee, shall verify that all project grading and construction plans include specific requirements regarding California PRC (Section 21083.2[g]) and the treatment of archaeological resources as specified above.	During excavation, grading, or construction activities	Project Applicant			
RCM CUL-2	Human Remains. In the event that human remains are encountered on the project site, work within 50 feet of the discovery shall be redirected and the County Coroner notified immediately consistent with the requirements of California Code of Regulations (CCR) Section 15064.5(e). State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. If the remains are	During construction activities	Project Applicant			



Table 7.B: Regulatory Compliance Measures as Specified in the Initial Study

Regulatory Compliance Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
determined to be Native American, the County Coroner shall notify the Native American Heritage Commission (NAHC), which shall determine and notify a Most Likely Descendant (MLD). With the permission of the property owner, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD may recommend scientific removal and non-destructive analysis of human remains and items associated with Native American burials. Consistent with CCR Section 15064.5(d), if the remains are determined to be Native American and an MLD is notified, the City of Cypress shall consult with the MLD as identified by the NAHC to develop an agreement for treatment and disposition of the remains. Prior to the issuance of grading permits, the Director of the City of Cypress Community Development Department, or designee, shall verify that all grading plans specify the requirements of CCR Section 15064.5(e), State Health and Safety Code Section 7050.5, and PRC Section 5097.98, as stated above.					
4.6: Energy					
The proposed project would not require any regulatory compliance measures related to energy.					
4.7: Geology and Soils					
The proposed project would not require any regulatory compliance measures related to geology and soils.					
4.8: Greenhouse Gas Emissions					
The proposed project would not require any regulatory compliance measures related to greenhouse gas emissions.					
4.9: Hazards and Hazardous Materials					
The proposed project would not require any regulatory compliance measures related to hazards and hazardous materials.					
4.10: Hydrology and Water Quality					
The proposed project would not require any regulatory compliance measures related to hydrology and water quality.					
4.11: Land Use and Planning					
The proposed project would not require any regulatory compliance measures related to land use and planning.					



Table 7.B: Regulatory Compliance Measures as Specified in the Initial Study

Regulatory Compliance Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance			
			Initials	Date	Remarks	
4.12: Mineral Resources						
The proposed project would not require any regulatory compliance measures related to mineral resources.						
4.13: Noise						
The proposed project would not require any regulatory compliance measures related to noise.						
4.14: Population and Housing						
The proposed project would not require any regulatory compliance measures related to population and housing.						
4.15: Public Services						
RCM PS-1	Any future projects implemented in accordance with the proposed project would be required to coordinate with OCFA to determine the appropriate development impact fees required in order to offset potential impact to OCFA staffing and service ability. Prior to the approval of a future project implemented in accordance with the proposed project, the designated site developer shall enter into a Secured Fire Protection Agreement with OCFA that details the agreed-upon development impact fees required for the project.	Prior to the approval of any future project	Project Applicant			
RCM PS-2	Payment of School Fees. Prior to issuance of any building permits, the Applicant/Developer of future residential development projects facilitated by the proposed project shall provide proof to the Director of the City of Cypress Community Development Department, or designee, that payment of school fees to the appropriate school districts have been made in compliance with Section 65995 of the California Government Code.	Prior to issuance of any building permits	Project Applicant			



Table 7.B: Regulatory Compliance Measures as Specified in the Initial Study

Regulatory Compliance Measures		Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
4.16: Recreation						
RCM REC-1	Dedication of Parkland and/or Payment of Park Fees. Prior to issuance of any building permits, the Applicant shall provide proof of compliance with the applicable provisions of Chapter 25 (Subdivisions), Article 6, Park and Recreational Facilities, of the City of Cypress (City) Municipal Code, or other fees as determined by the City, to the Director of the City Community Development Department, or designee.	Prior to issuance of any building permits	Project Applicant			
4.17: Transportation						
The proposed project would not require any regulatory compliance measures related to transportation.						
4.18: Tribal Cultural Resources						
The proposed project would not require regulatory compliance measures unique to tribal cultural resources. Please see RCMs CUL-1 and CUL-2 for relevant measures in Section 4.5 above.						
4.19: Utilities and Service Systems						
RCM UTIL-1	Construction and Demolition Ordinance. The construction contractor shall comply with the provisions of City of Cypress Ordinance No. 1166 and the 2019 California Green Building Standards Code, which would reduce construction and demolition waste. Ordinance No. 1166 is codified in Article VIII, Materials Questionnaire for Certain Construction and Demolition Projects within the City of Cypress in the Cypress Municipal Code.	During construction activities	Project Applicant			
4.20: Wildfire						
The proposed project would not require any regulatory compliance measures related to wildfire.						



8.0 LIST OF PREPARERS AND PERSONS CONSULTED

8.1 CITY OF CYPRESS

The following individuals from the City of Cypress (City) were involved in the preparation of this Draft Program Environmental Impact Report (PEIR):

- Alicia Velasco, Planning Director
- Laura Vander Neut, Contract Planner

8.2 DRAFT PEIR PREPARERS

The following individuals were involved in the preparation of this Draft PEIR. The nature of their involvement is summarized below.

8.2.1 LSA Associates, Inc.

The following individuals were involved in the preparation of this Draft PEIR:

- Ryan Bensley, AICP, Principal in Charge
- Steve Letterly, Senior Environmental Planner/Project Manager
- Matthew Wiswell, Senior Environmental Planner
- Lauren Peachey, Environmental Planner
- Olivia Mattair, Assistant Environmental Planner
- Pam Reading, Principal Environmental Planner
- JT Stephens, Principal
- Mohammed Abushanab, Mechanical Noise Engineer
- Giana Gurrera, Assistant Environmental Planner (formerly LSA)
- Jason Thomas, Graphics and GIS Specialist
- Amy Fischer, President/COO
- Cara Cunningham, Associate/Senior Air Quality Specialist
- Bianca Martinez, Air Quality Specialist
- Lauren Johnson, Technical Editor
- Chantik Virgil, Senior Word Processor

8.3 TECHNICAL REPORT PREPARERS

The following individuals were involved in the preparation of the technical reports in support of this Draft PEIR. The nature of their involvement is summarized below.

The following individuals were involved in the preparation of the *Historic Resources Assessment* (November 2023) and *Historic Resources Sensitivity Study* (August 9, 2023):

- Casey Tibbet, Cultural Resources Associate
- Eugene Heck, Architectural Historian/Cultural Resources Manager



The following individuals were involved in the preparation of the *Level of Service and Vehicle Miles Traveled Assessments* (May 2023):

- Ken Wilhelm, Principal
- Ambarish Mukherjee, Principal
- Ravikumar Palakurthy, Senior Transportation Engineer
- Kenneth Tan, Senior Transportation Engineer
- Debmalya Sinha, Senior Transportation Planner
- Shuqi Hao, Transportation Engineer

8.4 PERSONS CONSULTED

The following individuals were consulted during the preparation of this Draft PEIR:

- Cypress Police Department (CPD)
 - Chris Revere, Captain, Support Services Division
- Orange County Sanitation District (OCSAN)
 - Kevin Hadden, Principal Staff Analyst
- Orange County Fire Authority (OCFA)
 - Tamera Rivers, Management Analyst



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APPENDIX A

NOP, INITIAL STUDY, AND NOP COMMENT LETTER



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APPENDIX B

CALEEMOD OUTPUT



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APPENDIX C

HISTORIC RESOURCES ASSESSMENT AND SENSITIVITY STUDY



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APPENDIX D

ENERGY CALCULATIONS



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APPENDIX E

NOISE YEAR 2045 VOLUME SUMMARY



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APPENDIX F

PUBLIC SERVICES AND UTILITIES SERVICE PROVIDER COMMUNICATION



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APPENDIX G

LEVEL OF SERVICE AND VEHICLE MILES TRAVELED ASSESSMENT



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APPENDIX H

RECORD OF TRIBAL CONSULTATION



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